

modern slavery statement

Financial Year 2020/21

Contents

1. Organisational overview	3
1.1 Introduction	
1.2 cohealth's history	
1.3 cohealth today	
1.4 Governance structure	
2. Assessment of modern slavery risks	6
3. Our actions and approach to managing modern slavery risks	8
4. How are we assessing the effectiveness of our actions and approach	9
5. Consultation	10

The reporting entity

cohealth Limited, ACN 167 212 302, is a not-for-profit, unlisted public company limited by guarantee, based in Melbourne, Victoria.

cohealth is a charity, registered with the Australian Charities and Not-for Profit Commission.

1. Organisational overview

1.1 Introduction

cohealth is a not-for-profit community health organisation based in Melbourne, Victoria.

cohealth provides high quality health and support services, community programs and groups, as well as outreach services in Melbourne's CBD, and northern and western suburbs, across over 30 locations.

cohealth's work aims to improve the health and wellbeing of communities and address health and social inequity in partnership with people and the communities where they live.

cohealth does this by providing community health services, advocating for health and social equity, undertaking research, developing health promotion initiatives and through partnerships.

Community health aims to improve health and wellbeing for everyone in a community. cohealth are committed to providing responsive services that respect the human rights of all people, celebrates their diversity, enables their access, and promotes their participation in all aspects of their health and wellbeing.

We integrate human rights norms and principles in the design, delivery and evaluation of our services, programs and advocacy.

The idea behind community health is to help people live healthy lives by considering the whole person. A person's mental health, physical health, social connections and environmental circumstances are all interconnected. This means the approach to improving their health and wellbeing needs to be interconnected as well. Community health means that many different health and support services all work together as an integrated whole.

Community health providers like cohealth offer affordable health care, in particular for people who have low income. Health Care Card holders are also offered a discounted fee or can access some services for free.

cohealth's values are inquiry and innovation, respect, courage, social equity and trust.

1.2 cohealth's history

cohealth was formed in 2014 with the merging of Doutta Galla Community Health, North Yarra Community Health and Western Region Health Centre. Each organisation had a long and distinguished record of providing care for people in their local communities.

The dynamic and diverse histories of each of the three original organisations reflects the rise and evolution of community health in Australia. Their origins were in inner city localities which were home to working class, heavily industrialised communities with successive waves of immigrants and frequently high levels of disadvantage.

cohealth has continued to build on this people-focused history by expanding its services to all members of the community, reflected in the vision of our 2019-2023 strategy for 'healthy communities, healthy people'.

For cohealth, 'care' is about providing high quality healthcare, as well as caring for the social conditions that people need for productive and healthy lives. We continue to advocate and campaign in partnership with people with lived experience. We work at individual, community and societal levels and our efforts are proportionate to need.

1.3 cohealth today

cohealth has a unique model, focused on sustainable and impactful ways to address social and environmental challenges and make a real difference.



Through the cohealth model we:

Care for individuals

We design and deliver high quality healthcare services in partnership with our clients. It enables individuals to have a say in how their services are delivered. By engaging clients in codesign they become active participants in their own health management. This in turn improves the services, programs and products we provide for the whole community.

Care for community

We understand the needs of communities, their highest priorities and provide tailored healthcare and support services based on their needs.

Care for society

We work towards health and social equity for all through our advocacy efforts and campaigns, focusing particularly on the people most in need. We are committed to fairness and equality and to making sure no-one is left behind. Everyone has a right to access high quality, relevant healthcare services.

To learn more about cohealth, please visit cohealth.org.au.

1.4 Governance structure

cohealth's corporate governance is established in the company constitution, through Board and Board sub-committee governance charters, and enacted through organisational frameworks, policies and procedures. The Board is assisted by Board sub-committees, comprised of members of the Board, and delegates operational decision-making to the Executive Team.

cohealth's policy frameworks cover:

- Human Rights
- Best Care Quality
- Risk Management
- Service Access & Service Delivery
- Financial Management
- Asset Management
- Health & Wellbeing
- People & Culture
- Knowledge Management, and
- Document Management.



2. Assessment of modern slavery risks

cohealth is a large, multifaceted and diverse health care provider, delivering a wide range of health and community services to diverse communities. We want people of all gender identities, sexualities, cultural backgrounds and abilities to feel safe to bring their whole selves to cohealth.

The nature of community services is that they are located & delivered in the places where the need arises. As such, cohealth uses a range of suppliers to support operational and service delivery requirements.

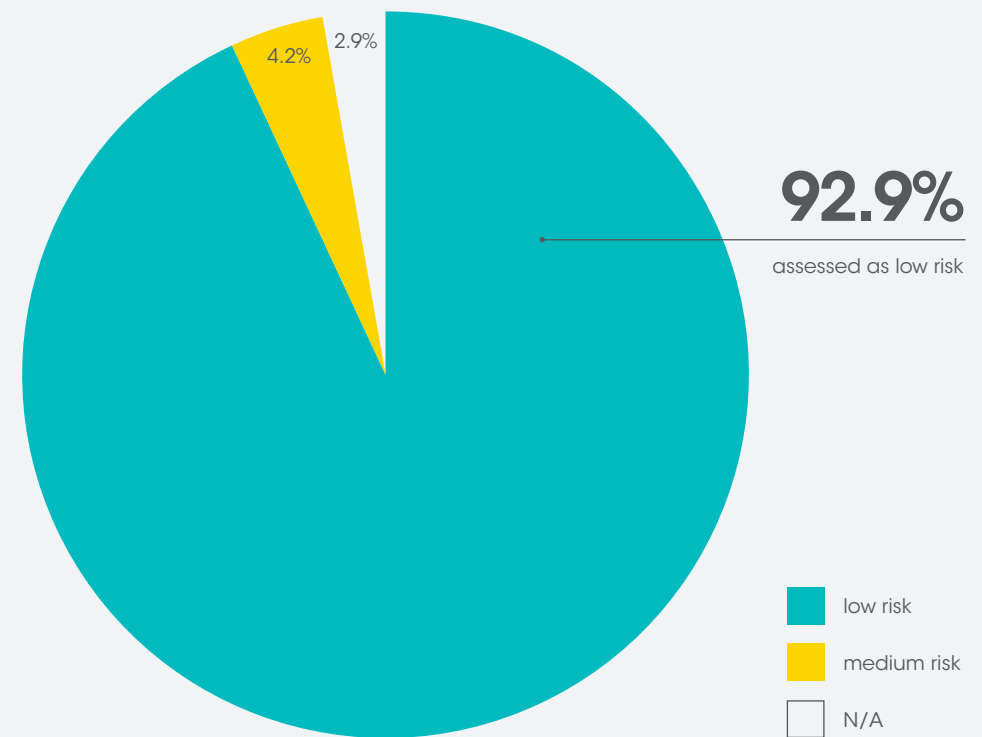
The 2020/21 financial year is the first year cohealth has provided a Modern Slavery Statement. The risk assessment process has encompassed a review our operations and supply chains to better understand the areas of potential risk.

By centralising and establishing strict procurement processes we work hard to ensure that the risks of modern slavery in the supply chain are eliminated or minimised.

Our procurement process is centralised, and we source services and products from well-established and reputable suppliers. Our process requires that the procurement of all goods and services is conducted in an honest, competitive, fair, transparent and ethical manner that aligns with cohealth values and delivers the best value for money while ensuring cohealth's reputation as a supporter of human rights is maintained.

Our procurement process includes a supplier review, to be conducted where appropriate, that identifies any actions or positions, regarding the Modern Slavery Act, that are not considered ethically sound or are in conflict with cohealth's values.

92.9% of cohealth's total expenses from the FY2020/21 have been assessed as **low risk**.



Assessment of Modern Slavery Risk by total % of 2020/21 expenses.
Refer to page 7 (right) for further detail and breakdown by Expense Category.

The table below provides an assessment of modern slavery risks

Expense Category	2020/21 % of total expenses	Assessment of Modern Slavery Risk	Assessment Basis
Employee benefits expense	76.8%	Low	92% of this expense relates to employees employed in Australia under various Fair Work approved industrial Agreements. The remaining 8% relates to skilled & qualified workers engaged via reputable employment agencies to support service delivery or corporate service functions.
Client related expenses	5.6%	Low	47% of this expense relates to payments to Victorian based health and community service providers and consultants with whom cohealth works in partnership to deliver and develop services. The remainder of the expenses relate to medical/clinical consumables procured under contract arrangements with reputable suppliers; interpreting services, and payments made directly to or on behalf of clients, for example, food, meals, brokerage, emergency relief.
Occupancy expenses	4.2%	Medium	37% of this expense relates to cleaning services, an industry that is at higher risk of modern slavery. cohealth employs a number of cleaning contracts across its different service locations. cohealth is working with these suppliers to ensure they comply with the Modern Slavery Act provisions. 26% relates to provision of security services, an industry also at higher risk of modern slavery. cohealth will undertake the same process with these suppliers. The remainder of the expenses relate to council rates, utility costs, building repairs & maintenance.
Administration and other expenses	4.1%	Low	Expenses relate to a range of administration expenses covering training & development, printing, stationery, photocopying, audit fees, insurance, subscriptions, and general administration expenses.
Information technology and communication expenses	2.3%	Low	The vast majority of these expenses are paid to large technology corporations for either software as a service or hardware. cohealth relies on the publicly available statements provided by these companies in relation to their compliance with internationally recognised codes of conduct in relation to modern slavery and human trafficking.
Service delivery expenses	2.1%	Low	Expense related to the engagement of providers to deliver specialist services, for example, oral prosthetics and dental services, supported residential services.
Consultancy and legal expenses	1.4%	Low	Expense related to the engagement of professional consultancy and legal services.
Motor vehicle and finance costs	0.6%	Low	Immaterial expenses related to motor vehicle running costs and general finance expenses.
Depreciation	2.9%	N/A	Depreciation of property, plant and equipment, and right of use assets (land & buildings, motor vehicles)
Total expenses	100%		

3. Our actions and approach to managing modern slavery risks

Our procurement process is centralised and strictly managed to ensure the procurement of goods and services is conducted in an honest, competitive, fair, transparent and ethical manner that aligns with cohealth values and delivers the best value for money while ensuring cohealth's reputation is maintained.

We give preference to contractors and suppliers who align with our values and the values expressed in the Modern Slavery Act. We have recently included a requirement in contracts and tenders that suppliers sign a Modern Slavery Clause agreeing to uphold the values, spirit, principles and requirements of the Act.

Some indicative excerpts from cohealth's Procurement Policy are:

This policy supports the aims of the Modern Slavery Act and by doing so supports the human rights of people affected by modern slavery.

cohealth will give preference to contractors and suppliers who:

- *align with cohealth values and the values expressed in the Modern Slavery Act*
- *sign the Modern Slavery Clause in Schedule 1 of this policy.*

Prior to entering any long-term contract, cohealth will consider the supplier's values and demonstrated behaviours, including compliance with the Modern Slavery Act.

During the procurement process a supplier review will be conducted identifying any actions or positions, regarding the Modern Slavery Act, that are not considered ethically sound or in conflict with cohealth values.

cohealth will continue to develop its capability throughout 2021/22 to build on and continuously improve compliance with the Modern Slavery Act.



4. How are we assessing the effectiveness of our actions and approach?

cohealth's strategy to formally assess the effectiveness of its actions and approach will be further developed in 2021/22.

To measure the effectiveness of our approach, the following assessments and actions will be undertaken:



Further analysis of our operations and supply chains and targeted engagement with our suppliers where modern slavery risks have been identified.



Monitoring the number of suppliers who have signed a Modern Slavery Clause agreeing to uphold the values, spirit, principles and requirements of the Act.



Monitoring the number of existing suppliers that have been reviewed, including numbers of open and closed findings where risks were identified.



Updating the Whistle Blower policy and procedures to encompass the requirements of the Modern Slavery Act.



Providing staff training and awareness of the risks of modern slavery and guidelines on how staff can support cohealth's actions to minimise the risk in our operations and supply chains.

5. Consultation

cohealth has consulted with the in-house procurement team to understand the supply chains used in our operations. The risk and compliance team have been consulted to undertake risk assessments of suppliers and supplier categories.

cohealth has undertaken benchmarking against modern slavery statements published by similar organisations. These insights will support our own appropriate and effective approach.

This statement was approved by the cohealth Limited Board, which is its principle governing body, on 8 December 2021 and duly signed by the Chair of the cohealth Limited Board on 10 March 2022.

Signed on behalf of cohealth Limited by:



Kerry Thompson
cohealth Limited Board Chair

Melbourne





