

# MODERN SLAVERY

2022 – 2023 financial year

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*Healthdirect Australia acknowledges the Traditional Owners of Country throughout Australia and their continuing connection to land, sea and community. We pay our respects to the Traditional Owners and to Elders both past and present.*

## Introduction

As a Commonwealth company, Healthdirect Australia Limited (**Healthdirect**) has a responsibility to combat the risks of modern slavery in our business and supply chain. We expect our suppliers to demonstrate the same commitment.

In respect of financial year 1 July 2022 to 30 June 2023 (FY2023), Healthdirect continued developing its processes to address modern slavery in its organisation and supply chain. This included:

- (a) ensuring that any new contractual arrangements entered into include mandatory obligations on suppliers to comply with modern slavery laws; and
- (b) developing an awareness of best practice in industry with regard to modern slavery and considering the appropriate measures needed to be adopted by Healthdirect as a government-owned entity.

This statement has been prepared in accordance with the *Modern Slavery Act 2018 (Cth) (Act)* in respect of FY2023. This statement has been prepared in consultation with senior executives within our business.

## Our business, structure & operations

Healthdirect is a national, government-owned organisation that supports Australians in managing their own health and wellbeing. We offer an online portal of health information, additional telehealth helplines (e.g. after-hours GPs, parenting advice), aged care services, a website-based symptom checker, health services directories and other related services.

We are based at our office in Sydney, New South Wales. For FY2023, Healthdirect had annual consolidated revenue of \$206 million. We do not have any subsidiaries. Healthdirect is funded by its shareholders: the respective health departments of the Commonwealth Government, the Australian Capital Territory, New South Wales, the Northern Territory, South Australia, Tasmania, Victoria, Queensland and Western Australia.

The principal activities of the Company during FY2023 were:

- providing publicly-funded health and related virtual care services, as well as designing and implementing innovative digital health services on behalf of all Australian governments; and
- providing the Australian public with access to the right health advice and the most appropriate health services for their needs, when and where they need it.

Here is an overview of our portfolio:

- **healthdirect** - a government-funded service that provides 24 hours a day, 7 days a week access to health advice and information via a telephone helpline and a range of digital channels to help people make more informed health decisions;
- **National Health Services Directory (NHSD)** – a national directory of health services and the practitioners who

provide them. It supports the Australian Digital Health Agency's national strategy for improving digital health integration across the health system.

- **National Coronavirus Helpline (NCH)** - established as one of the first tools in the Australian Government's response to COVID-19, the National Coronavirus Helpline (1800 020 080) provided general information and symptom assessment to callers, 24 hours a day, seven days a week. While most calls were from concerned members of the public seeking up-to-date public health information for their symptoms or situation, the helpline also provided a wide variety of clinically useful information for health workers such as COVID-19 testing criteria, personal protective equipment, vaccine status and what to do if a patient tests positive. This service was fully integrated into the healthdirect helpline from 7 December 2023.
- **After hours GP Helpline** – a safety-net health service which helps people in rural and remote areas obtain the services of a GP and provides an alternative to visiting a hospital emergency department. It operates as an extension of the healthdirect helpline.
- **My Aged Care** - funded by the Commonwealth Department of Health and Aged Care, My Aged Care was created to help people navigate the aged care system, find information and connect with aged care services. It comprises a national telephone line, managed by Healthdirect, and a website, managed by a third-party provider.
- **healthdirect Video Call** - a telehealth consultation platform available for clinicians and patients to use. It connects people to healthcare services by overcoming the barriers of distance,

time and cost. We work with the Commonwealth Government and Primary Health Networks (PHNs) to integrate Video Call programs into primary healthcare services, utilising telehealth as a whole-of-population model of care where appropriate to protect the health and wellbeing of practitioners and patients.

- **Pregnancy, Birth and Baby** - a national helpline, video and website service that supports expecting parents, parents, families and carers of children aged up to five years. Healthdirect delivers the service on behalf of the Commonwealth Government.
- **Ambulance Secondary Triage** – a 24-hour ambulance secondary triage service on behalf of the NSW Health and WA Health departments, the service assists NSW Ambulance and St John Ambulance in WA to manage Triple Zero (000) calls requesting an ambulance.

We also operate a number of smaller-scale health services, both temporary and ongoing, using a variety of delivery channels, including helplines.

As a public company regulated under the *Corporations Act 2001* (Cth) and limited by shares, Healthdirect Australia has a Board of Directors (**Board**) appointed by a shareholder committee. The Board oversees two internal committees which assist in carrying out its responsibilities: the Clinical Governance Advisory Group, and the Finance, Risk Management and Audit Committee.

The Board appoints a Chief Executive Officer. The business has six divisions (*Health Services, Clinical Governance, Industry Infrastructure and New Services, Finance, Platform, and the Chief Executive Division*), with the executive managers of each division comprising the Executive Team.

## Our operations and supply chain

We operate a single site in Sydney, Australia, which is also our head office. We outsource our call handling and some other operations to third-party service providers. All call handlers in our outsourced call centres are based in Australia.

Our shareholders are exclusively Australian governments, namely: the Australian Commonwealth Government, the Australian Capital Territory, New South Wales, the Northern Territory, Queensland, South Australia, Tasmania, Victoria and Western Australia.

We focus on consistent arrangements with suppliers that maintain a high standard of compliance throughout their operations. The majority of our 250 active suppliers are based within Australia. We do not manufacture any goods ourselves.

During the reporting period our top 20 Suppliers accounted for over 90% of our total spend. We have a good understanding of these top suppliers and continually work with our direct suppliers to further understand their own supply chains and associated risks.

We work with both trade and non-trade suppliers directly:

- (a) **trade suppliers** provide the key services we provide to consumers, including contact centre services, digital platforms and telephony; and
- (b) **non-trade suppliers** provide goods and services to support our effective operations and administrative functions. Our biggest non-trade categories include:
  - corporate IT;
  - professional services;
  - marketing;
  - audit and compliance;
  - security services; and
  - facilities and office management.

## Modern slavery management program FY2023

During FY2023 Healthdirect, as part of our Modern Slavery Management Program, engaged a third party to conduct an ESG Assessment and benchmarking exercise, which included a Modern Slavery questionnaire. The program included the top 20 suppliers based on a risk assessment. The suppliers were evaluated based on their completed ESG and Modern Slavery self-assessment and due diligence questionnaires to determine their level of ESG maturity. An ESG Index was provided for each supplier which included supplier diversity, working conditions, regulatory compliance, and included a full assessment and validation of child labour, forced labour and modern slavery risks and relevant controls.

Our third-party partner benchmarked these suppliers using applicable global standards, such as the GRI (Global Reporting Initiative), VRF/SASB (Value Reporting Foundation) and SDG (Sustainable Development Goals). The suppliers were also risk assessed based on both their industry and the goods and services they provide. A further round of evaluation was undertaken to validate the information provided by each supplier.

Healthdirect was then able to determine the levels of maturity and validate the controls in place with these suppliers to include in our supplier management program and annual business review. More than half of the suppliers had governance and controls in place that resulted in a maturity level ranked as leading or innovative in relation to modern slavery governance. These rankings enable Healthdirect to focus on those suppliers where the level of maturity was rated as learning and to ensure that the developments stated in their self-assessment are progressing during FY2024.

Our Modern Slavery Management program forms part of our third-party risk management framework which is under our broader supplier management framework.

Healthdirect is undertaking a range of activities to manage the risks of modern slavery in its operations and supply chains including:

- developing and implementing supplier due diligence and a Code of Conduct related to modern slavery through our third-party risk management framework;
- managing the recording and reporting of risks in Healthdirect's risk register (all managed in accordance with the Enterprise Risk Management Framework);
- protecting whistleblowers; and
- providing appropriate investigation and remediation where incidents of modern slavery have been reported.

We have zero tolerance of slavery. To support the organisation going forward, we are in the process of developing a supply chain compliance program which will include:

- our risk assessment process as outlined above;
- a procedure for communicating our Code of Conduct to our suppliers;
- where practicable, imposing a contractual obligation on our suppliers to commit to appropriate anti-slavery provisions including in respect of the materials and services they receive from third parties;
- auditing our key and high-risk suppliers; and
- pre-screening new suppliers who have not previously been vetted under other government supplier panels to identify modern slavery risks.

Training has been conducted within Healthdirect utilising our membership with the

Chartered Institute of Purchasing and Supply (CIPS) to uplift and continue to develop our depth of knowledge of modern slavery and the associated risks in our supply chain.

Healthdirect has a reporting process to enable modern slavery risks to be escalated within the organisation. All employees, contractors and personnel have a responsibility to identify and report modern slavery risks to relevant Company representatives in accordance with our Whistleblower Policy. We make it clear to employees, contractors and personnel that we will not subject them to any repercussions for reporting such risks. Where a potential incident is brought to the attention of our legal team, they will consider the modern slavery risk in the first instance and assess whether it should be assigned to a working group established to investigate and report on the issue, and whether the executive team and Healthdirect's Board of Directors should be notified.

If our investigative processes determine an issue of non-compliance with our policies by one of our suppliers, we will endeavour to have the supplier identify and correct those issues. If it is apparent that an individual has suffered harm as a result of such an issue, we will seek to ensure that they are 'made good' by leveraging our position with the relevant supplier. To the extent we hold information relevant to a criminal investigation of or improper acts by suppliers, we would report them to the proper authorities.

If a supplier fails to make progress in respect of its required remediation, we may subject it to review and sanctions by leveraging our position with them, including the potential termination of our relationship.

Where Healthdirect caused or contributed to the risk, we will take action to prevent that risk and remedy any actual impact as appropriate.

A key way that we control the potential risk of modern slavery arising in our supply chain is via our contract terms and conditions with our suppliers. A risk assessment is required to be completed by our suppliers

based on the outcome of a supplier risk assessment and forms part of our supplier management governance processes.

*We did not identify any modern slavery practices within our operations or our supply chain during FY2023 on the basis of our Modern Slavery and ESG Management Program.*

## Ensuring effectiveness of the program

We consider the effectiveness of the actions taken by us to assess and address modern slavery risks by outlining key steps taken during the reporting period. These include:

**supplier actions** - assessing the extent to which our suppliers are engaging with the modern slavery requirements and are developing their ability to address their own modern slavery risks;

**internal audit** - modern slavery risks are considered in developing and scoping the annual internal audit program undertaken by our independent auditors;

**updated supplier contract terms** – a review and uplift of updated modern slavery-specific provisions have been incorporated in both our key supplier procurement activities and contracts;

**updating procurement processes** – we have updated our standard procurement processes to reflect modern slavery compliance requirements;

**reporting and remediation** – we have expanded access to our complaints and grievance mechanisms to enable our own employees, workers within our supply chain and community members to report human rights and modern

slavery concerns. Improvements were made to the Whistleblower Policy and processes in FY2023; and

**consultation** – we have working groups in place to build on our ESG Framework, which includes a Modern Slavery assessment and continuous improvement section. Our third-party risk management framework includes due diligence questionnaires within all procurement processes. Suppliers are included in consultation during these procurement processes and as part of our supplier management governance processes, including periodic strategic and operational supplier management meetings.

## Next steps

Following a review of the effectiveness of the actions we took this financial year to minimise the risk of modern slavery in our operations and supply chains, we are incorporating modern slavery assessments within our supplier management governance for all Tier 1 suppliers and the remainder of our suppliers will be monitored through our third-party risk framework via onboarding, procurement projects and regular risk assessments.

A case study with one of our Tier 1 suppliers will be developed as an outcome of the Modern Slavery Management Program and benchmarking exercise during FY2024.

Regular reporting on the above will provide an overview of the ongoing assessment of these suppliers and there is also a regular review of the risk register. These activities are monitored via our executive governance committees.

Our Supplier Code of Conduct is in development and will be communicated with our suppliers and further training provided within Healthdirect to support these initiatives.

## Approval

This Statement is made by Healthdirect Australia Limited for the financial year ending 30 June 2023. This Statement was approved by our Board of Directors on 14 December 2023 for the purposes of Section 16(2)(a) of the Act.

A handwritten signature in black ink, appearing to read 'J Muirsmith', written in a cursive style.

Chair of the Board of Directors  
Jane Muirsmith  
Date: 14 December 2023

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