

**Grampians Health
Modern Slavery Statement
2023/2024**

Acknowledgement of Traditional Owners

Grampians Health pays its respects to all of the Traditional Custodians of the countries that our health service operates on and their connections to land, waterways and community.

We acknowledge our deep respect to their Elders past present and extend that respect to Aboriginal and Torres Strait Islander peoples today.

Grampians Health recognises and values the contributions that Aboriginal and Torres Strait Islander peoples make in our society.

Sovereignty has never been ceded. It always was and always will be, Aboriginal land.

Introduction

This Modern Slavery Statement is made pursuant to the Commonwealth Modern Slavery Act 2018 (i.e. *the Act*) by Grampians Health and relates to the financial year 1 July 2023 to 30 June 2024.

In making this statement, Grampians Health recognises that modern slavery practices are major violations of human rights and serious crimes, where coercion, threats, or deception are used to exploit victims and undermine or deprive them of their freedom and must be stamped out in all its various forms. Grampians Health commits to its ongoing responsibility to use its best endeavours to identify and take action against modern slavery risks to maintain a responsible and transparent supply chain.

About Grampians Health

Grampians Health is dedicated to delivering comprehensive and accessible healthcare solutions to our diverse population.

Committed to the wellbeing of individuals, families, and communities, Grampians Health prioritises effective prevention and health promotion strategies. Through a collaborative approach, we aim to strengthen the capacity of the communities we serve, ensuring equitable access to high-quality care, closer to home.

With a focus on innovation and compassion, Grampians Health strives to be at the forefront of healthcare excellence, fostering a healthier and thriving Grampians region. Serving a population of over 250,000 residents across 48,500km squared, Grampians Health understands the need for continuous care growth and improvement, and is committed to addressing life expectancy disparities, reducing cancer-related premature mortality rates, and tackling the rising rates of poor mental health. Grampians Health also strives to address alcohol-related harm, obesity, and First Nations health disparities.

Grampians Health is dedicated to delivering a wide range of services, spanning from pregnancy and birth to palliative care and organ donation.

Innovative care is at the core of Grampians Health's approach. Using a mix of mobile and remote services, staffing at partner facilities, and robust collaborations with health services across the entire Grampians region, Grampians Health values and invests in a skilled workforce, providing ongoing training and development opportunities.

Grampians Health was formed on 1 November 2021, through the amalgamation of Edenhope and District Memorial Hospital, Stawell Regional Health, Wimmera Health Care Group and Ballarat Health Services, following approval from the Minister for Health under the Victorian *Health Services Act 1988*.

Reporting Criterion 1 and 2:

Structure, operations, and supply chains

Grampians Health (ABN: 39 089 584 391) is a health service established under section 181 of the *Health Services Act 1988 (Vic)*. Grampians Health is registered at 1 Drummond Street North, Ballarat, Victoria, Australia.

To provide high quality care and exceptional patient experience, Grampians Health procures its goods and services directly from suppliers or through collective purchasing agreements established by Health Share Victoria (HSV).

HSV is a state-wide procurement organisation that partners with Victorian public health services to procure best-value goods and services. HSV works in partnership with public health services to understand their requirements, facilitate large-scale collective tenders, and manage common-use contracts on behalf of the State. Grampians Health and other public health services in Victoria are heavily dependent on the processes and policies HSV has established to identify and manage modern slavery risks in its supply chains. (See the [Health Share Victoria website](#) for further information on its role in identifying and managing modern slavery risks across its collective agreements).

As part of the supply chain agreement with HSV, Grampians Health purchases the majority of the goods and services that it needs from suppliers who are party to HSV collective agreements. As such, it is recognised and accepted that HSV has a significant role in the supply chain of the health service.

Throughout 2023/2024, approximately 80% of Grampians Health's non-salary expenditure was procured through HSV collective agreements. In recognising the significant role that HSV has in Grampians Health's supply chain, and the benefit of its actions for the broader sector, HSV has continued its commitment to Grampians Health, assisting the health service in addressing supply chain modern slavery risk, by:

- Assisting Grampians Health to meet its reporting requirement under *the Act*;
- Implementing and enforcing effective systems and controls to reduce the risk of modern slavery;
- Ensuring there is transparency in its operations and approach to addressing modern slavery risk;
- Fostering open and transparent supplier relationships which encourage modern slavery reporting and meaningful change through remediation;
- Providing the tools for Grampians Health to assess modern slavery risk within those organisations outside of the HSV collective contracts; and
- Applying a continuous improvement approach to how it supports health services to report on the risk of modern slavery practices within their operations and supply chains.

In 2023/2024 Grampians Health continued to order through the HSV centralised ordering system for the delivery of personal protective equipment via the state supply chain, and relied on HSV and Monash Health as the operator of the state supply service to ensure that modern slavery risk is addressed through its supply chain practices.

Grampians Health does undertake some direct procurement activity, with the major categories of goods and services procured including:

- Outsourced non-clinical support services;
- Telecommunications;
- Information technology hardware, software and services;
- Professional services;
- Furniture, fittings and equipment;
- Facilities maintenance;

- Financial investments through the Victorian Funds Management Corp. (VFMC); and
- Specialised clinical products.

Grampians Health upholds the Australian Government’s position on modern slavery, in that there is no place for modern slavery in the Australian community or in the global supply chains of Australian goods and services.

Reporting Criterion 3:

Risks of modern slavery practices in the operations and supply chains of Grampians Health

Grampians Health uses a range of goods and services to ensure the overall health and well-being of Australians, noting that Australia is reliant on imports from global supply chains for the supply of these essential products, and that there is evidence that indicates the occurrences of modern slavery in the sourcing of raw materials used in the production of health care goods, including gloves, surgical instruments, patient clothing, uniforms and footwear, sheets, towels and other textiles, and electronic health care equipment.

It is understood that the sourcing of raw materials and the production of these health care goods often involves hazardous working conditions, labour exploitation, child labour and other abuses, resulting in a high-risk that Australian health services are exposed to modern slavery risks.

However, to the best of our knowledge and abilities, Grampians Health has not directly caused or contributed to modern slavery practices but acknowledges that modern slavery risk exists in supply chains from offshore and high-risk geographies.

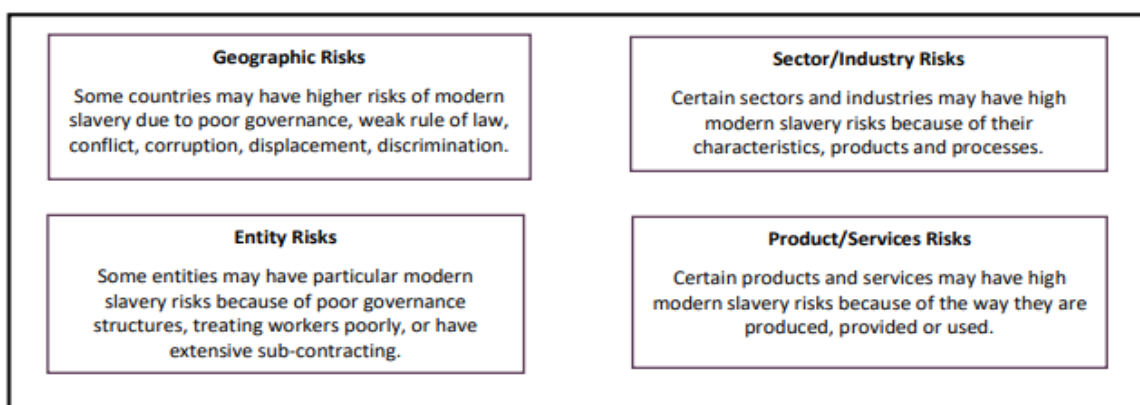
It's with this lens that Grampians Health will focus its 2024/2025 modern slavery efforts, undertaking an assessment of procurement activity with those organisations that Grampians Health directly procures from.

Grampians Health holds several investments with the Victorian Funds Management Corporation (VFMC). VFMC has a global investment portfolio spanning most major industries, countries and sectors such as energy, food and beverage, and materials. The VFMC is committed to responsible labour practices and is against all forms of slavery. In this regard the VFMC has several key focus areas that it applies to assist in addressing modern slavery risk.

Assessment methodology

In assessing suppliers, a modern slavery risk assessment tool comprising of macro and micro assessment components was utilised. The micro assessment identified modern slavery risks across four categories.

Figure 1. Modern Slavery Micro Assessment Tool

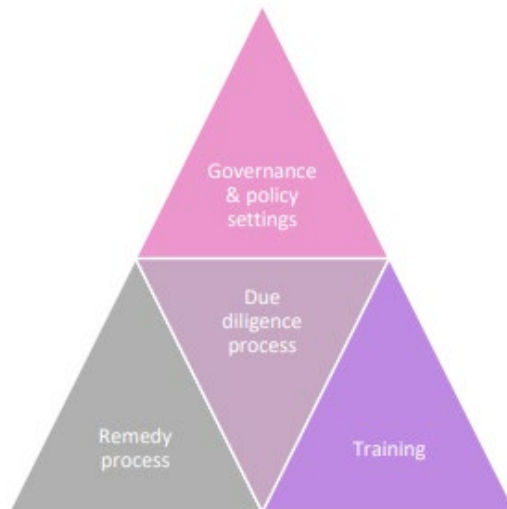


The assessment involved consideration of whether there is a high prevalence of modern slavery in a particular sector or industry, or associated with particular goods or services, or in the geographic location that the product or service is sourced or produced from.

The micro assessment also considered whether the nature of the supply chain model carried a greater risk of modern slavery. This type of assessment provided a general understanding of the scope of modern slavery risks that suppliers may carry.

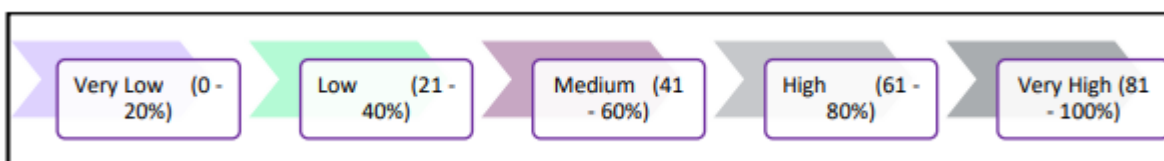
The macro assessment facilitated a detailed analysis by identifying and assessing possible modern slavery risk and in determining what risk mitigation strategies suppliers already had in place and what risks would need to be managed. Furthermore, the macro assessment involved risk identification across four categories: policy, due diligence, remedy and training.

Figure 2. Modern Slavery Macro Assessment Tool



Both the macro and micro components included assigned weighting, rating, and risk scales, designed to allocate a modern slavery risk rating to suppliers. Suppliers were allocated one of the following risk ratings: very low, low, medium, high, or very high.

Figure 3. Risk Ratings



For those suppliers with HSV agreements, the tool was operationalised in the form of a Modern Slavery Supplier Questionnaire on the Informed 365 platform, being HSV’s supply chain management platform. The questionnaire was rolled out to 159 suppliers in October 2023 with a completion request date of November 2023 to coincide with the conclusion of the reporting period under *the Act*.

Modern slavery supplier risk assessment

HSV Collective Agreements

Grampians Health procures approximately 80% of goods and services (i.e. non-salary expenditure) through HSV collective agreements. Given this quantum, in 2023/2024 Grampians Health collaborated with HSV, placing additional effort within this supplier cohort to undertake supplier risk assessments.

In total, supplier risk assessments for 159 suppliers were undertaken in 2023/2024. Of the 159 suppliers invited to participate in supplier risk assessments: 122 responded (77%); 4 declined (2%); and 33 did not respond (21%).

Figure 4. 2023/2024 Supplier Risk Assessment Responses

Risk Category	No. Suppliers
Very High	3
High	18
Medium	62
Low	39
Very Low	0
Total	122

These results illustrate a significant improvement from supplier risk assessments completed in the prior year.

Figure 5. 2022/2023 Supplier Risk Assessment Responses

Risk Category	No. Suppliers
Very High	0
High	13
Medium	51
Low	43
Very Low	0
Total	107

Of significance, the macro assessment of responses received in 2023/2024 indicated that:

- 103 respondents have a Modern Slavery Statement / Policy;
- 88 respondents communicate their Modern Slavery Statement / Policy;
- 87 respondents monitor compliance to their policy
- 71 respondents have remediation / action plans in place to address and / or to respond to modern slavery issues;
- 104 respondents identify that their organisation has a role / responsibility to identify and oversee modern slavery risks in relation to the goods and / or services they provide; and
- 97 respondents train their staff to identify, assess and respond to modern slavery risk.

Additionally, Grampians Health has requested assistance from HSV to provide mitigation strategies for the 3 identified very high risk and 18 identified high risk suppliers. This work will form part of Grampians Health's 2024/2025 modern slavery review and action plan, whereby Grampians Health commits to further collaboration with HSV, and very high / high risk suppliers, to further understand and mitigate modern slavery risk.

Finally, Grampians Health and HSV are working with all suppliers who have not responded, or declined to respond, to assess what this means for the future supply of goods and services, tender responses and contractual obligations.

Reporting criterion 4:

Actions taken to assess and address these risks, including due diligence, remediation processes and contracts

HSV provides modern slavery community of learning sessions to health services on a monthly basis. As part of our commitment to continually improve, these sessions are attended by procurement staff from Grampians Health, ensuring that the health service is in step with current guidelines and best procurement practices.

Grampians Health continues to incorporate a modern slavery clause into all new non-HSV supplier contracts, committing suppliers to taking all reasonable steps to identify, assess and address risks of modern slavery practices in their operations and supply chains, used in the provision of goods and services.

Modern slavery clauses have been incorporated into all request for tender documents as part of mandatory procurement requirements at Grampians Health.

Suppliers wishing to conduct business with Grampians Health need to commit to the Supplier Code of Conduct. Under this requirement suppliers are expected to proactively identify, address and where required by legislation, report on risks of modern slavery practices in their business operations and supply chains.

Actions to be taken by Grampians Health in 2024/2025

1. In 2024/2025 Grampians Health will seek to conduct further analysis of Grampians Health spend of clinical consumables outside of the consumables procured from HSV collective agreements. This work is likely to see Grampians Health stop purchasing outside of the HSV collective agreements for a number of clinical consumables;
2. As part of continuous improvement processes, Grampians Health continues to take part in the modern slavery training provided by HSV, monthly;
3. Grampians Health will continue to provide guidance to all staff involved in tenders and contract negotiations in assessing modern slavery requirements;
4. Maintain all tender and contract documentation as per modern slavery legislation requirements;
5. Continue evaluating and undertake risk assessments of Grampians Health specific suppliers; and
6. In consultation with HSV, Grampians Health plans to focus on the following improvement initiatives in order to further meet the requirements of *the Act*:
 - o Continue to be involved in the modern slavery community of learning sessions, provided by HSV;
 - o Expand our staff's knowledge base and awareness through continued learning and education programs; and
 - o Continue to make suppliers aware of the modern slavery requirements, even if they are not required to report on Modern Slavery.
7. Grampians Health will undertake a review of non HSV suppliers, applying the Pareto Principle (i.e. the 80/20 rule) to Grampians Health spend profile. Suppliers will be risk rated in regard to compliance with *the Act*, i.e. having a modern slavery statement including compliance to the four macro categories.

Training

HSV continues to facilitate learning programs and training for key health service stakeholders on modern slavery practices and the requirements of *the Act*. These workshops, attended by Grampians Health procurement lead, provided guidance on how to address the seven mandatory reporting criteria under *the Act*.

HSV will be launching an online modern slavery training program that could possibly be incorporated into Grampians Health Learning Hub. Once launched, all staff involved in the supply chain at the Grampians Health will be required to undergo this training.

Reporting criterion 5:

How Grampians Health assesses the effectiveness of actions taken to assess and address modern slavery risks

Grampians Health relies on HSV's advice and consultation to understand and fulfil its modern slavery obligations. Recognising their significant role in preventing modern slavery in health service supply chains and the benefits of its actions to the broader sector, HSV has developed a comprehensive program to support the sector, including:

- A modern slavery toolkit;
- A modern slavery statement guide;
- Supplier engagement template; and
- Modern slavery community of learning program.

With this, in 2023/2024, Grampians Health identified and completed the following actions:

- Implemented and embedded Modern Slavery requirements in existing policies and procedures;
- Provided targeted education and training for the procurement team using education packages from Health Share Victoria; and
- Have a greater understanding of Modern Slavery and associated risks.

Grampians Health ensures that all key personnel have undertaken all necessary training, continue to be involved in the ongoing modern slavery health sector community, and immediately actions all HSV updates. In addition, the effectiveness of actions can also be measured through the ratings of the suppliers. This is a continuous process, with both Grampians Health and HSV working in conjunction to reduce exposure in the supply chain.

Reporting Criterion 6:

Grampians Health consultation process with related entities it owns or controls

Grampians Health does not own or have any controlling interest in any other entities.

Reporting Criterion 7:

Other relevant information

Grampians Health has no further information to report or disclose.

Closing statement

Grampians Health is confident that the steps taken this year have continued to build a strong foundation for a robust modern slavery framework. Grampians Health recognises there is more to do and is committed to continually improving its approach, collaborating with our stakeholders to identify and eradicate modern slavery in our supply chains.

Grampians Health Board is pleased to see HealthShare Victoria taking a leading role in assessing and managing the sector wide risks of modern slavery.

This modern slavery was approved by the Board of Directors of Grampians Health on 30 October 2024.

A handwritten signature in black ink, appearing to read 'Bill Brown', with a stylized, cursive script.

Bill Brown
Board Chair
Grampians Health

