

South West Healthcare Modern Slavery Statement

This Modern Slavery Statement is made pursuant to the Commonwealth *Modern Slavery Act 2018* (the Act) by South West Healthcare and relates to the financial year 1 July 2024 to 30 June 2025.

Mandatory Criteria 1: Identify the reporting entity

South West Healthcare, ABN 41 189 754 233 is a public health service established under the *Health Services Act 1988* (Vic).

Mandatory Criteria 2: Describe structure, operations and supply chains

South West Healthcare provides a comprehensive range of specialist services from geographically separate campuses located at Warrnambool, Camperdown, Lismore and Macarthur.

South West Healthcare provides acute, rehabilitation, and aged care together with an extensive range of primary and community health services. Acute and Community based Psychiatric Services are provided from the inpatient unit (Warrnambool Campus) and community based mental health teams located in Warrnambool, Camperdown, Portland and Hamilton.

With a total of 36 aged care beds and 207 acute beds (including 15 acute psychiatric inpatient beds), the organisation services a population in excess of 110,000. South West Healthcare had in excess of 2,000 staff employed in 2024-25 and the Annual Report includes extensive and updated details of the activities of the health service. The Annual Report is published on the South West Healthcare internet page.

SWH Supply Chain

South West Healthcare Supply Chain supports health services from the South West Victoria region, namely:

1. South West Healthcare (SWH) (sites in Warrnambool, Camperdown, Lismore and Macarthur)
2. Western District Health Service (WDHS) (sites in Hamilton, Peshurst and Coleraine)
3. Colac Area Health (CAH)
4. Portland District Health (PDH)
5. Moyne Health Services (MHS)
6. Terang and Mortlake Health Service (TMHS)
7. Casterton Memorial Hospital (CMH)
8. Hesse Rural Health (Hesse)
9. Heywood Rural Health (HRH)
10. Great Ocean Road Health (GORH) (sites in Lorne and Apollo Bay)
11. Timboon and District Healthcare Service (TDHS)

HealthShare Victoria (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. South West Healthcare purchases the goods and services it needs from the suppliers who are party to HSV collective agreements. As such, it is recognised that HSV has a significant role in health service supply chains.

HSV was responsible for 72 collective agreements with a spend value of \$1.4 billion in 2024-25.

HSV contracts cover a broad range of services, equipment and supplies across a number of categories including ventilators, beds, mattresses, patient trolleys, treatment chairs, hypodermic needles and syringes, gloves, pharmaceutical products, IV fluids, agency labour, catering supplies, laundry and linen services and non-emergency patient transport. A full list of HSV's sourcing categories can be found at <https://healthsharevic.org.au/contracts-and-documents/contracts>.

Mandatory Criteria 3: Describe the risks modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity own or controls.

South West Healthcare has taken a targeted, risk-based approach to assessing modern slavery risks within its operations and supply chains, consistent with the UN Guiding Principles on Business and Human Rights.

This approach has enabled South West Healthcare to continue addressing areas of higher modern slavery risk. As a health service with a largely skilled workforce, South West Healthcare considers the risk of modern slavery within its direct business operations to be relatively low. South West Healthcare has not caused or contributed to modern slavery practices, but rather, SWH is linked to risks which exist offshore and in high-risk geographies. In line with a risk-based approach, these risks will be further examined in subsequent reporting periods.

In its 2023-24 Modern Slavery Statement, South West Healthcare undertook to conduct a risk assessment on the top 10 of its suppliers (based on spend data) and those suppliers that operate in industries considered to have high modern slavery risks. Whilst this has not been fully achieved, South West Healthcare reiterates its recognition of the importance of this activity and will endeavour to, in the 2025-26 reporting period engage HSV to undertake a risk assessment of South West Healthcare's top 80% spend suppliers. In the interim, South West Healthcare continues to engage with HSV to understand the general modern slavery risks within our supply chains.

South West Healthcare recognises that the extensive nature of our global supply chains may expose us to modern slavery risks. Given HSV's significant role in South West Healthcare's supply chains, HSV has helped identify the general risks of modern slavery that may be present.

HSV has scoped the general modern slavery risks in health service supply chains by drawing on academic research and international and domestic reports and analysis. South West Healthcare may be exposed to a number of modern slavery risks due to the diversity of products and services sourced by HSV and the associated geographic locations, industries and regulatory systems further down those supply chains.

Some of the general risk areas present in South West Healthcare's supply chain include:

- Labour practices in offshore manufacturing facilities, some of which are located in South-East Asia;
- Labour practices in the sourcing of raw materials, including cotton and rubber; and
- Industry risks associated with textiles, electronics and cleaning services.

In addition to general risks, HSV has identified the following high risk areas specific to the healthcare sector:

- Surgical masks and examination gloves;
- Surgical instruments and equipment; and
- Linens and gowns.

Given the level of complexity in such extensive supply chains, HSV continues to refine its risk assessment methodology to further improve the visibility of high-risk areas within health supply chains in Victoria.

HSV also recognises that COVID-19 may have increased modern slavery risks in some supply chains. These risks include:

- Increased global demand due to supply chain shortages, particularly in the category of personal protective equipment;
- Shorter production windows;
- Increased unemployment and a fear of loss of income;
- Factory closures; and
- Inability of vulnerable migrant workers to return to home countries.

HSV will continue to assess and address additional risks within healthcare supply chains caused by the COVID-19 pandemic.

Mandatory Criteria Four: Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes

South West Healthcare continues to recognise the importance of this activity and will endeavour to undertake a review of policy, due diligence, remediation, contracts and training in the 2024-25 reporting period. South West Healthcare will continue to engage with HSV to understand the actions that HSV has undertaken to assess and address the modern slavery risks in South West Healthcare's supply chains. HSV actions included engaging with suppliers through supplier presentations, uplifting supplier understanding of modern slavery and modern slavery contract clauses, including the new HSV supplier mandatory minimum standards.

Specific actions South West Healthcare has undertaken in the current reporting period:

- Published a modern slavery factsheet on our staff intranet site and South West Healthcare website
- Included modern slavery in procurement risk register

- Further reviewed our procurement contracts and tender documents to include modern slavery clauses where they do not exist and enhance where they do (South West Healthcare Tender documentation includes a Modern Slavery Clause)
- Reviewed and updated our purchase order Terms and Conditions to include reference to modern slavery
- Added the ability to report any instances of modern slavery in the South West Healthcare supply chain via our website
- Provided opportunities for staff to complete modern slavery training module
- Provided communications to key staff to ensure awareness and clarity around modern slavery related considerations and responsibilities.

Specific actions SWH will endeavour to take in the next reporting period include:

- Continual enhancement of Board of Directors, Executive and Senior Management awareness of our modern slavery obligations
- Include modern slavery in organisation risk register
- Extend our training, induction and awareness to include our non HSV suppliers and contractors, including adding them to HSV contacts for modern slavery updates and information sessions

In recognition of the significant role that HSV has in health service supply chains and the substantial ongoing resourcing constraints placed on South West Healthcare, HSV continues to undertake numerous activities to address modern slavery risks in South West Healthcare's supply chains.

HSV has a modern slavery risk program which supports Victorian health services to address modern slavery risks in their operations and supply chains. The program encompasses health service education and support, supplier engagement, due diligence initiatives amongst other activities.

HSV upholds the Australian Government's position on modern slavery. HSV publishes its Modern Slavery Position Statement on its website. HSV works with health services on combatting modern slavery in health supply chains, assisting health services and suppliers to understand and mitigate modern slavery risks through engagement, education and undertaking supplier risk assessments on health services behalf.

The modern slavery section of HSV's website contains information and resources to assist reporting entities required to submit a Modern Slavery Statement.

In certain procurement activities, South West Healthcare will require suppliers to complete a set of questions aligned to the HSV supplier mandatory minimum standards as part of our market approach and supplier selection process. As previously mentioned South West Healthcare includes a Clause related to Modern Slavery in its Tender documentation and also considers supplier tender response in its tender evaluation process under certain circumstances. This approach assists South West Healthcare to assess supplier policies and practices to identify, assess and mitigate the risk of modern slavery practices in their operations and supply chains.

South West Healthcare will continue to develop and incorporate appropriate evaluation methodologies to contribute to modern slavery issues in a meaningful way through the evaluation process.

As well as specific modern slavery provisions, suppliers wishing to conduct business with HSV, public hospitals or any other branch of the Victorian Government must aspire and commit to meet the Supplier Code of Conduct. Under the Supplier Code of Conduct, 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.

The Standards align with the universally recognised UN Guiding Principles on Business and Human Rights, the expectations of the Modern Slavery Act 2018 (Cth), and the Victorian Government Supplier Code of Conduct.

- The Program requires suppliers to understand the risks of modern slavery in their operations and supply chains and take appropriate action to identify and address those risks.

HSV will continue to facilitate training workshops for HSV staff and key health service stakeholders on modern slavery practices and the requirements of the Act. South West Healthcare attended eight out of the ten community of learning sessions held by HSV over the period.

Mandatory Criteria Five: Describe how the reporting entity assesses the effectiveness of actions taken to assess and address modern slavery risks

South West Healthcare has continued to have limited capacity to implement mechanisms to assess the effectiveness of actions taken to address our modern slavery risks. South West Healthcare intends to engage HSV to undertake supplier risk assessments of its top 80% of suppliers directly engaged by South West Healthcare.

HSV has introduced several mechanisms for monitoring the effectiveness of the actions it has taken to date. Representatives from mandated health services who attend training sessions on the requirements of the Act periodically complete surveys to self-assess their progress against several criteria. The results are used to measure the success of engagement programs, inform future workshop content and identify potential gaps in training.

In addition to this, HSV's senior leadership has taken ownership of the modern slavery program and progress is regularly discussed at senior committees. Feedback from committee members is used to inform decision making and future activities within the program.

Mandatory Criterion Six: Describe the process of consultation with any entities the reporting entity owns or controls

South West Healthcare does not own or control any other entities.

Mandatory Criterion Seven: Any other relevant information

In order to support the implementation of the Act within health services, HSV has developed a toolkit to assist with meeting the requirements under the Act. The toolkit contains:

- A modern slavery plan to support the implementation of the governance structures, policies, processes and risk registers needed to underpin a successful modern slavery framework;
- Advice on implementing a modern slavery policy;
- A modern slavery risk register to capture and address the key modern slavery risks that a health service might cause, contribute or be directly linked to;
- A modern slavery risk assessment tool, including advice on modern slavery risk assessments, supplier questionnaires for ITS due diligence and incumbent suppliers and advice on how to interpret questionnaire results;
- A modern slavery fact sheet to facilitate staff training; and
- Supplier contract considerations, including the addition of modern slavery clauses in contracts.

The rollout and implementation of the toolkit supports health services to conduct their own risk assessment, due diligence and remediation activities.

South West Healthcare is utilising several items from the toolkit.

Closing statement

South West Healthcare is confident that the steps taken this year have built upon a strong foundation for a robust modern slavery framework. We recognise there is more to do and South West Healthcare is committed to continually improving our approach, partnering with our stakeholders and working to eradicate modern slavery.

This statement was approved by the Board of South West Healthcare on 27/06/2025

Signature



Name Allison Patchett
Title Board Chair
South West Healthcare