

Western Health Modern Slavery Act Statement

Financial Year 2023-24



Western Health





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ABOUT WESTERN HEALTH

WESTERN HEALTH
is the reporting entity.

ABN
61 166 735 67

Our Community

Western Health (WH) is the major healthcare provider to one of the fastest growing - and most diverse - regions of Australia.

Melbourne's western suburbs are rapidly growing. The catchment population is nearing 900,000 and the birth rate and movement into this region means that strong growth will continue into the years ahead.

Our communities are culturally rich, with members speaking more than 150 different languages and dialects. Yet, while proudly diverse, people from across our suburbs face significant challenges. Many experience substantial social and economic disadvantage, with higher than average unemployment and a large proportion of our population experiencing financial hardship.

Our population has higher than average rates of cancer, heart disease, stroke and mental illness, with diabetes and depression also significant population health issues. And our community is ageing, with frailty becoming a significant challenge to independent healthy living.

Western Health is committed to providing Best Care to communities across Melbourne's west, improving health outcomes for all.

Western Health has a strong philosophy of working with its local community to deliver excellence in patient care. We span a number of municipalities and value our relationships with each local government.

Western Health provides services to residents of the following local government municipalities:

Brimbank

Maribyrnong

Moonee Valley

Hume

Hobsons Bay

Melton

Moorabool

Wyndham

Our People

Employing more than 12,500 staff and over 700 volunteers, there is a focus on enabling and supporting the culture and capability of all people across the organisation. A large proportion of our staff are from the western suburbs, or live locally, further entrenching Western Health in the communities we serve.

Our growing health service has long-standing relationships with health providers in the western region of Melbourne, as well as strong affiliations with numerous colleges and academic institutions.



Our Services

Western Health provides a comprehensive, integrated range of clinical services from its various sites ranging from acute tertiary services in areas of emergency medicine, intensive care, medical and surgical services, through to sub-acute and aged care and onsite and virtual ambulatory clinics. Our services include oncology, renal, women's health (including maternity), chronic disease, geriatrics and cardiology.

We provide a combination of hospital, community based and in reach services to aged, adult and paediatric patients and newborn babies. Western Health also offers drug health and addiction medicine support through its inpatient and community drug health services.

Underpinning our world-class clinical care is Western Health's commitment to research and education. The Western Centre for Health Research and Education, based at Sunshine Hospital, provides a range of purpose built, state of the art teaching, research and simulation facilities. It is home to the Western Clinical School for Medicine and Allied Health in partnership with the University of Melbourne and also houses researchers, academics and educators from Western Health, Victoria University and the University of Melbourne.

Our Locations

Western Health operates public hospitals and health services at Sunshine, Footscray, Williamstown, Sunbury, Bacchus Marsh and Melton.

BACCHUS MARSH HOSPITAL

Bacchus Marsh Hospital is a 60 bed (plus three special care nursery cots) facility providing urgent care, general medical and surgical, aged care, palliative care and maternity services, along with community based services and specialist based clinics. Bacchus Marsh Hospital also supports Grant Lodge Residential Aged Care Facility.

MELTON COMMUNITY HEALTH

Melton Community Health provides urgent care, dental, dialysis services and day chemotherapy, as well as a comprehensive range of allied health, paediatric, medical and nursing specialist clinics and community based services.

FOOTSCRAY HOSPITAL

Footscray Hospital is an acute and subacute teaching hospital with approximately 250 beds. It provides elective and emergency care, with a range of inpatient and outpatient services including acute general medicine, critical care services, acute aged care and related clinical support. Footscray Hospital is the largest Western Health surgical site for complex and significant cases and Orthopaedics.

SUNBURY COMMUNITY HOSPITAL

The Sunbury Day Hospital provides day medical, day surgical, day chemotherapy and haemodialysis treatment and a number of specialist clinics.

SUNSHINE HOSPITAL

Sunshine Hospital is an acute and subacute teaching hospital with approximately 600 beds. The hospital provides elective and emergency care with a range of inpatient and outpatient services including intensive care and coronary care, acute medical and surgical services, sub-specialty medicine and surgical services, and rehabilitation, aged care and palliative care. Sunshine Hospital also provides a range of women's and children's services at the Joan Kirner Women's and Children's facility which opened in 2019. The Sunshine Hospital Radiation Therapy Centre operates through a partnership between Western Health and the Peter MacCallum Cancer Centre.

WILLIAMSTOWN HOSPITAL

Williamstown Hospital is a 90 bed facility providing emergency, surgical, rehabilitation and geriatric evaluation and management services, renal dialysis, community rehabilitation and transition care.

OUR SUPPLY CHAIN

Western Health has a large multi-layered supply chain that includes the purchase of products and services required for the delivery of hospital operations. The supply chain is made up of approximately 2,400 suppliers across a diverse range of industries, each supported by a multi-level supply chain. Our suppliers (and suppliers to our suppliers) are primarily located in Australia, but also in countries including Canada, China, Costa Rica, Czech Republic, Dominican Republic, France, India, Ireland, Japan, Malaysia, Mexico, Pakistan, Poland, Slovakia, Sri Lanka, Sweden, Switzerland, Taiwan, Thailand, Tunisia, UK and the USA. Many of these countries have publicised records of modern slavery, particularly in those countries where the rule of law is challenged and use of low cost, migrant labour reflects standard operating practices. In addition to hospital specific products and services, Western Health also procures goods and services related to a range of business functions including office and corporate administration, building and construction, engineering, labour hire, security, cleaning, catering, information technology infrastructure and uniforms. Western Health does not engage directly with any raw material or commodity producers.

BELOW ARE SOME GENERAL EXAMPLES OF WHERE RISKS OF MODERN SLAVERY MAY EXIST:

- Surgical and examination gloves manufacturing usually occurs in Malaysia, Thailand, and Sri Lanka
- Surgical instruments such as scissors, scalpels and forceps manufacturing in Pakistan
- Linens, gowns and patient clothing manufacturing in India and Pakistan
- Healthcare equipment manufacturing mostly occurring in Asia.

Non-procurement related risks of modern slavery potentially arise in the Australian healthcare context, in operating activities including building and facilities services, contingent and base-skill workers, hospitality and food workers identified as areas of potential risk.

HEALTHSHARE VICTORIA

Healthshare Victoria (HSV) was established on January 1st 2021 as a commercially oriented independent provider of supply chain, procurement and corporate shared services to Victoria's public health sector. HSV's purpose is to partner with Victoria's public health services and suppliers to ensure the right products and services are delivered to the right place at the right time, supporting better value for our public health services and better outcomes for their patients. Since

establishment, its focus has been on the end-to-end supply chain needs of health services. This has included establishing transformational capabilities to cater for developments when appropriate in non-clinical shared 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. Western Health purchases goods and services from 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 contracts cover a broad range of services, equipment and supplies. Examples of sourcing categories covered are 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.

For contracts entered into by Health Share Victoria and other Government entities that Western Health uses, Western Health relies on those entities to complete appropriate supplier due diligence.

SUPPLIER ASSESSMENT SCOPE

HSV has worked in partnership with Public Health services to determine the optimum method to perform annual risk assessments on Health Services suppliers and their supply chains. The HSV 'Modern Slavery Position Statement' and 'Modern Slavery Risk Mitigation Program' were approved at the HSV October 2022 Board meeting. This includes HSVs commitment to undertake annual risk assessments for health service suppliers (Mitigation Program, clause 5.1,b,i) and not just HSV centralised contracts as was the previous approach. This will remove workload from health services and reduce duplicated requests for suppliers.





HEALTHSHARE VICTORIA ACTIONS

The following information relates to suppliers contracted by Healthshare Victoria (HSV). A risk assessment was conducted by HSV on all identified suppliers to oversee risks of modern slavery behaviours or trends in the supply chain. The risk assessment was updated from the previous year to evaluate and identify areas of concern. This allowed HSV to further track and tailor support specific to the needs of individual health services.

The risk assessment was split into two sections.

Company details which was compiled of four sub-categories:

Modern Slavery, comprised of four sub-sections that are covered in the Act, those being:

- policy
- due diligence
- training
- remedy

There was also a miscellaneous section to get any additional feedback from suppliers and if further training was desired. There were 23 questions in total with sub-questions assigned to targeted questions to illicit further information where required.

THE COMPANY DETAILS SECTION WAS TO IDENTIFY:

- the supplier's operational location/s
- industry/ies they work in
- gauge visibility of who they supply to more broadly.

THE MODERN SLAVERY SECTION INCLUDED:

- a policy subsection requesting information on what policies are in place around modern slavery
- due diligence covered what actions were being taken to mitigate risk and what visibility the supplier had over the operations they oversee
- a training section that revolved around what positions within the supplier were being trained on modern slavery and how they spread awareness of the issue within their organisation
- remedy requested information around processes in place when identified modern slavery acts/incidents occur and if any current allegations are being investigated against that supplier.

These categories allow HSV to identify where weaknesses in mitigation may be occurring, allowing broader awareness regarding which organisations are having difficulty and this could significantly help lower their modern slavery risk.

The Micro assessment identified modern slavery risks across four categories:

GEOGRAPHIC RISKS

Some countries may have higher risks of modern slavery due to poor governance, weak rule of law, conflict, corruption, displacement, discrimination.

ENTITY RISKS

Some entities may have particular modern slavery risks because of poor governance structures, treating workers poorly, or have extensive sub-contracting.

SECTOR/INDUSTRY RISKS

Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes.

PRODUCT/SERVICES RISKS

Certain products and services may have high modern slavery risks because of the way they are produced, provided or used.

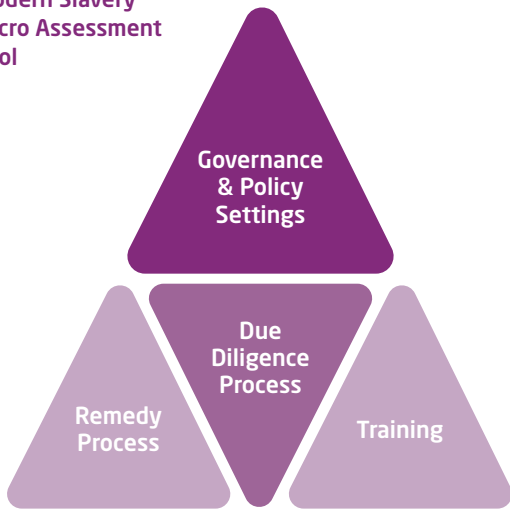
This involved considering whether there is a high prevalence of modern slavery in a particular sector or industry, or associated with a particular good or service, or in the location that the product or service is sourced or produced from. The micro assessment also considered whether the nature of the 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.

Macro assessment involved risk identification across four categories (as noted above):

- policy
- due diligence
- remedy
- training

**Modern Slavery
Micro Assessment
Tool**



GEOGRAPHIC RISKS

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Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes.

ENTITY RISKS

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PRODUCT/SERVICES RISKS

Certain products and services may have high modern slavery risks because of the way they are produced, provided or used.

SCORING

Scoring for this year's risk assessment was adjusted from the previous assessments completed. Notably the weightings were adjusted to both sections; that is: Company details/ Modern Slavery, to ensure a greater reflection of actions taken and to provide a more accurate picture of the suppliers' approach to modern slavery.

COMPANY DETAILS, accounted for twenty per cent of the overall score that could be accumulated. This was seen as a decisive step going forward, as suppliers might operate out of a high-risk area or industry for their operations. Thus, to reduce penalising based on location or industry alone, the modern slavery component was reweighted higher to screen what mitigation actions were being taken to ensure no adverse behaviours were present.

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 a supplier may carry.

MODERN SLAVERY was weighted at 80 per cent as this section was to allow the supplier to highlight what policy, procedures, due diligence/visibility, remedy, and training/ awareness were in place and to offset the company details section. In these sections, scoring was assigned to each question with some yielding higher scores based on the importance of the topic. This accumulation of the score would equal their weighting for the various section/s, etc., to score high on a target would result in a high to very high result in modern slavery.

The macro assessment facilitated a detailed analysis of modern slavery risk by identifying and determining what mitigation suppliers took over their supply chain. This is pivotal, as the more awareness about operating in a high-risk industry or area would need to be associated with greater risk management including potential risks.

The totals of both the macro and micro sections would allocate one of the following risk ratings to the suppliers: Very low, Low, Medium, High, or Very high. From the rating, monitoring and support can occur to facilitate less and less opportunity that modern slavery occurs.

OPERATIONALISATION

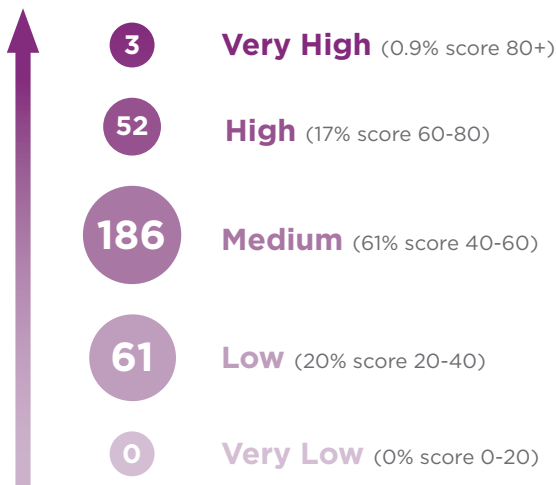
The Tool was operationalised in the form of an HSV Modern Slavery Supplier Questionnaire (Questionnaire) on the Informed365 Platform, HSV's supply chain management platform. The Questionnaire was rolled out to all 224 suppliers on 10 October 2022 with a completion request date of 14 November 2022 to coincide with the conclusion of the reporting period under the Act.

RESPONSE RATE

Of the 224 invited suppliers, 155 responded, 11 declined to respond and 58 did not respond.

MODERN SLAVERY SUPPLIER RISK RATINGS

This section illustrates the all-inclusive, combined macro and micro assessment outcomes for suppliers, outlining the risk categories in which the suppliers fall.



POLICY

This section reviews the policies and procedures suppliers have in place when encountering modern slavery issues. The intent was to see how many suppliers had a policy, if it was communicated to staff, and how is it monitored. The results are outlined below:

- From the 155 respondents, 125 suppliers have policies in place regarding modern slavery.
- All suppliers with a policy stated they had communicated the policy to staff.
- Of the suppliers with a policy, 106 had a system in place to monitor compliance.

DUE DILIGENCE

This section reviews what the supplier is doing to actively mitigate modern slavery. This includes reviewing what screening processes of suppliers are in place, the mapping of their supply chain and a compliance overview of procedures.

- 138 Suppliers have a role that is responsible for identifying and overseeing modern slavery risks in relation to the goods/services they provide.
- 62 suppliers have mapped their supply chain on multiple layers and levels to confirm high transparency over operations.
- 119 suppliers have a system or process in place to screen prospective suppliers.
- 110 suppliers conduct risk assessments inclusive of modern slavery.
- 93 suppliers conduct audits that it includes modern slavery.

TRAINING

This section reviews the training and material a supplier has across its operations to educate and bring awareness of modern slavery to staff.

117 suppliers train their staff to identify, assess and respond to modern slavery risks.

REMEDY

This section reviews what processes and remedial action plans the organisation has to respond to allegations of modern slavery 92 Suppliers have remedy/ action plans to respond to allegations of modern slavery.

HSV ACTIONS

HSV have developed actions to address very high to high suppliers which include suppliers identified as high or very high risk are informed of their specific risk levels, resource guidance provided to direct suppliers of free resources and guides available to assist suppliers to address identified risks, and training modules that provide information about free modern slavery risk modules available on the HSV website to enhance their understanding and mitigation capabilities. HSV inform health services of any suppliers identified as very high risks and any mitigations strategies.



WESTERN HEALTH ACTIONS

ALL WESTERN HEALTH SUPPLIERS

The following information relates to suppliers contracted by Western Health. Western Health has 2,839 suppliers. A survey was sent to all those suppliers asking for an assessment of the perceived risks of modern slavery in their supply chain. It is a perceived risk as it is doubtful any of these suppliers know with certainty that such activity is or might be occurring. Of the 2,839, only 397 replied, a response rate of 14 per cent.

Of the 397 survey responses, 97% reported Low Risk, 4% reported Moderate Risk and no supplier reported a High Risk of Modern Slavery somewhere in their supply chain. Irrespective of the surveyed organisation's assessment of its risk, all suppliers were asked if they had modern slavery mitigation strategies in place. Of the total respondents, 227 or 60% per cent answered 'Yes'. Of the 40% that answered "No", 65%, provided some explanation of why they did not.

PROCUREMENT UPDATES

Western Health continue to insert provisions into its procurement agreements, sourcing templates and policies and procedures for the provision of goods and services, intended to mitigate the risk of modern slavery in Western Health's supply chains.

Western Health's expectation is that if at any time a supplier becomes aware of modern slavery practices in the operations and supply chains used in the performance of the agreement, the supplier must, as soon as reasonably practical, take action to remove these practices from its operations and supply chains. Reasonable requests for information made by Western Health must be responded to by a supplier, with failure to do so giving rise to a breach of the agreement. Western Health agreements are three to five years which helps support long term commitments with contracted suppliers in Western Health's efforts in combating modern slavery.

OPERATIONAL ACTIVITIES

Since the prior year, Western Health has introduced modern slavery remediation and reporting obligations into the agreements for the provision of outsourced retail services at the majority of its public hospital and health services sites.

Western Health employees and members of their immediate families, which includes a significant workforce across health support services including food services, environmental services and security services, have access to a confidential and free employee assistance programme.

The provision of health services has the potential to bring Western Health staff into contact with victims of modern slavery requiring support or care. Western Health has procedures for the sensitive management of extreme safety risks identified in its patient cohort.

STAFF TRAINING

HSV is offering training session for procurement staff on the risks of modern slavery. WH has committed to sending senior procurement staff to those sessions to improve their general awareness of modern slavery but also to assist them

in dealing with Western Health suppliers in an effort to mitigate risks. As at the time of this report, Western Health is in the planning stage for making HSV's integrity-related online training modules available to all employees on Western Health's learning management system.

ORGANISATIONAL COMMITMENT

Overall, Western Health has committed to assisting in efforts to combat modern slavery through the actions taken above and in ongoing support of efforts to minimise, if not eliminate, modern slavery from its supply chain.

Western Health has engaged all suppliers to attend HSV supplier modern slavery training and will further refine the management of suppliers identified as high risk with no mitigation strategy by conducted a risk assessment and using HSV and other strategies and tools.

ASSESSMENT OF EFFECTIVENESS OF THESE ACTIONS

The actions taken by Western Health will raise the awareness of the risks of modern slavery within the organisation and with Western Health's suppliers.

The true measure of effectiveness would be a measurement of the reduction in the use of modern slavery in the supply chain. To date, an ability to make such a measurement is not within the capability of Western Health and probably not for most of its suppliers. Therefore, the effectiveness of the actions taken can only be theoretically assessed.

The most effective action is probably the contractual changes that have occurred. These new obligations on suppliers will increase scrutiny and it is expected that change will occur.

Monitoring of supplier reported risks will continue and over time it is hoped to see a trend demonstrating a reduction in the perceived risk.



CONTROLLED ENTITY

WESTERN HEALTH FOUNDATION LIMITED

Western Health is currently the sole member of the Western Health Foundation Limited ABN 37 867 721 909. This company limited by guarantee is a registered charity and the trustee of the Western Health Foundation.

Western Health Foundation Limited is not a reporting entity for the purposes of the Modern Slavery Act 2018 (Cth).

CLOSING STATEMENT

Western Health is confident that the steps taken this year have continued to build a strong foundation for a robust modern slavery avoidance framework. Western Health is committed to continually improving its approach, partnering with stakeholders, and working to eradicate modern slavery.

The Western Health Board is pleased to see Health Share Victoria taking a leading role in assessing and managing the sector wide risks of modern slavery. We look forward to seeing this central leadership role grow further, with the support of the Victorian Public Health Service.

This modern slavery statement was approved by the principle governing body of Western Health as defined by the *Modern Slavery Act 2018(Cth)* ("the Act") on December 1st 2024.

This modern slavery statement is signed by a responsible member of the Western Health Board, as defined by the Act.

Prof the Hon Jill Hennessy

Board Chair
Western Health
July 1st 2024







Western Health



[westernhealth.org.au](https://www.westernhealth.org.au)