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# Swan Hill District Health Modern Slavery Statement

FY 2024-2025

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## Modern Slavery Act Statement

This modern slavery statement is made in accordance with the *Modern Slavery Act 2018* (Cth) (the Act) which requires qualifying entities to report on the risk and mitigating actions of Modern slavery within the organisation against seven mandatory criteria.

The Act requires reporting entities to provide an annual modern slavery statement for each reporting period.

This is the first modern slavery statement submitted by Swan Hill District Health and covers the reporting period 1 July 2024 to 30 June 2025.

## Mandatory Criteria one and two:

### Identify the reporting entity and describe its structure, operations and supply chains:

*Swan Hill District Health  
48 Splatt Street  
Swan Hill  
Victoria*

*ABN 24 314 338 210, is a Schedule 1 Public Health Services incorporated pursuant to the provisions of the Health Services Act 1988 (Vic).*

Swan Hill District Health (SHDH) is a 143 bed (including Aged Care) fully integrated rural public health service. We employ around 630 staff and service a 100 km radius area with an estimated catchment area of around 35,000 people. We are located on the Murray River in rural Victoria 344 km north west of Melbourne.

SHDH Operations	
Theatre Operations	1,883
Admitted patients	6,798
Babies delivered	159
Ambulance arrivals	2,240
Emergency attendances	17,846
Outpatient appointments conducted	27,836

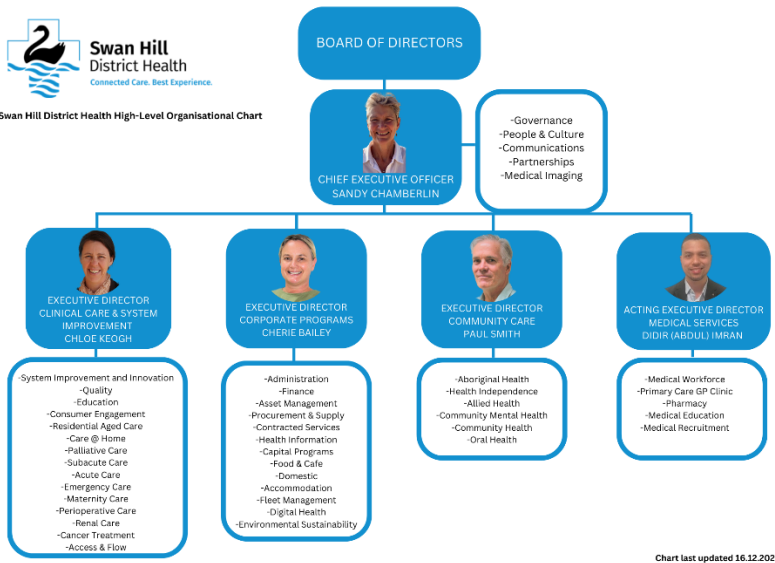
Our service includes but isn't limited to Theatre, Acute, Emergency, Maternity, Radiology, Sub-acute, 2 Aged care facilities, Medical clinic, Allied and Community health services. Further information can be found in the SHDH annual report:

[swan-hill-district-health-annual-report-2024-25.pdf](#)

Organisational structure:



Swan Hill District Health High-Level Organisational Chart



**Supply Chain**

Swan Hill District Health’s (SHDH) supply chain includes but is not limited to the products and services used to deliver healthcare services including consumables, PPE, medical equipment and ICT AV. SHDH also includes goods and services provided by contractors and consultants. SHDH provides external support to local business through contracts such as Victoria police meals and laundry services and Meals on Wheels.

SHDH also utilises the contracts under the Health Share Victoria (HSV) arrangement. HSV is a state-wide procurement organisation that partners with Victoria’s 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/agreements and manage common-use contracts on behalf of the state. SHDH purchases the goods and services it needs from the suppliers who are party to HSV collective agreements.

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-tenders/contracts-and-documents>

**Mandatory Criteria three**

**Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls:**

This is the first year SHDH has been required to report Modern Slavery under the Act, and therefore we are in early stages of developing modern slavery governance. SHDH are developing policies and Risk profiles for suppliers in conjunction with HSV.

Whilst SHDH purchase through HSV, SHDH may be exposed to modern slavery risk due to the nature of products and services. These potential risks are due to associated geographic locations, industries and regulatory systems further down the supply chain.

Some of the potential risks identified include:

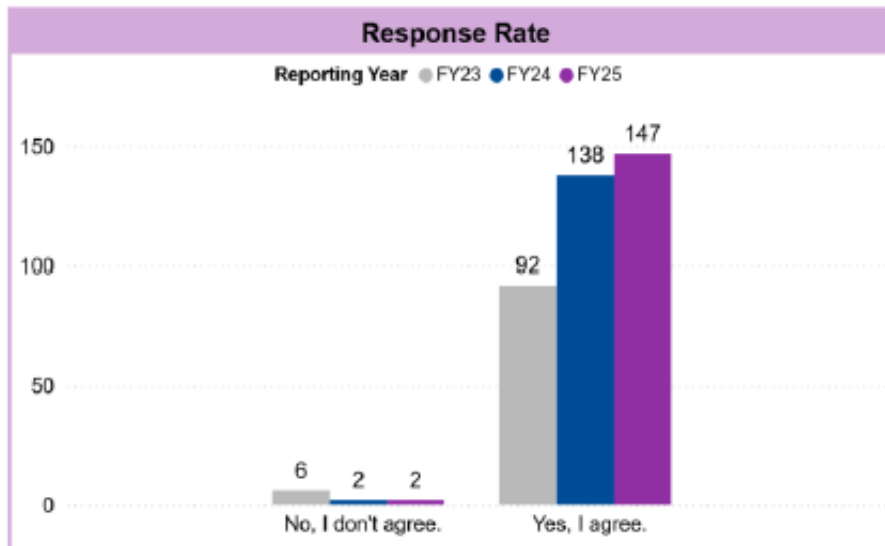
- Labour practices in offshore manufacturing facilities.
- Labour practices in sourcing raw materials, including rubber cotton; and
- Industry risks associated with textiles, electronics and cleaning services.

SHDH acknowledge the risk of modern slavery being present in health sector supply chains and the organisation recognises staff training is one of the first actions to will take to increase awareness of modern slavery within our organisation. SHDH will work with HSV to have the suppliers we directly engage with risk assessed. This will give SHDH visibility over the risks within the supply chain we directly engage, given that HSV is giving SHDH visibility over suppliers whom our organisation access through HSV agreements.

SHDH intends to Increase training for staff on modern slavery starting with the supply department and then move through the rest of the organisation.

The organisation will commit to the development of a risk assessment tool with HSV to enable the analysis of our modern slavery maturity.

Through HSV’s Modern Slavery Risk Mitigation Program; HSV undertakes annual supplier risk assessments of the suppliers SHDH accesses through HSV. For the risk assessment period covered by this statement, HSV undertook risk assessments of 147 suppliers on collective agreements; some of which are accessed by SHDH.



**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:**

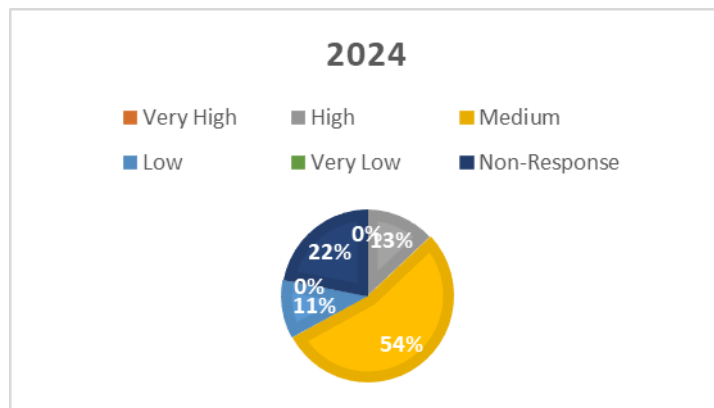
SHDH are working to develop a modern slavery policy. Having a policy will guide and direct staff and will ensure the organisations commitment to the prevention of modern slavery.

Swan Hill District Health are looking to strengthen their supply chain by reducing off contract purchasing and risk assess direct suppliers with HSV’s support.

SHDH are committed to embed modern slavery risk mitigation in our procurement process though education, training and risk assessments. Increased training opportunities for our staff and the implementation of a modern slavery policy will assist to raise awareness and provide guidance for SHDH for future years. We will also continue to encourage our direct suppliers to attend and or access HSV’s training sessions for those suppliers who supply in lower tiers of the supply chain to also help uplift our suppliers to meet their obligations to help reduce modern slavery in our supply chain.

**Supplier risk ratings in percentage terms**

Risk Category	Supplier percent in each risk category		
	2022	2023	2024
Very High	0%	1%	0%
High	0%	12%	13%
Medium	0%	36%	54%
Low	0%	27%	11%
Very Low	0%	0%	0%
Non-Response	0%	24%	22%



HSV requested the modern slavery policies of the 13 high risk suppliers identified in HSV’s SHDH annual supplier risk assessment. A total of 9 policies were received and feedback provided.

SHDH staff attended one out of 10 HSV MS Community of Learning sessions. Topics covered include: last minute tips for reporting; 2023 supplier risk assessment results; Sector focus on the freight industry; KPI’s for effectiveness; and, what a good statement looks like.

Additionally, 12 of the 13 high risk collective agreement suppliers attended HSV supplier engagement sessions throughout the year. The sessions focussed on actions to mitigate modern slavery risk (for further details see criteria five).

**Mandatory Criteria five**

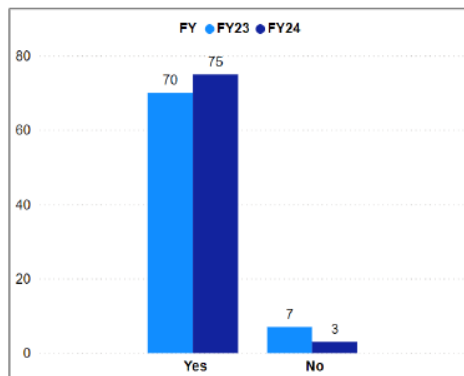
**Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks:**

Currently SHDH’s approach to risk rating and assessing suppliers is in early stages of development as this year is the first year we have been required to report.

Discussions have already taken place with HSV to conduct training and SHDH will utilise HSV’s resources to assist in developing policies, procedures and strategies to reduce the risk of modern slavery within its direct suppliers and more broadly.

Looking at current suppliers SHDH accesses through HSV’s collective agreements, we can see from the below data that 75 out of the 78 suppliers engaged this financial year have modern slavery policies. This indicates that 75 of the organisations have awareness of modern slavery and are engaging to reduce it.

Policy in place



Out of the 78 respondents, 75 suppliers have policies in place regarding modern slavery.

**Mandatory Criteria six**

**Describe the process of consultation with any entities the reporting entity owns or controls:**

Swan Hill District Health does not own or control any other entities.

**Mandatory criteria seven**

**Any other relevant information:**

Swan Hill District Health recognises that they are in the early stages of modern slavery assessment and education. The health service will endeavour to progress education and action against modern slavery. This will include reporting on numbers of staff completing the Echo Modern Slavery training modules on the HSV website.

SHDH will engage with HSV to commence having its direct suppliers risk assessed and also to implement a modern slavery policy if required.

**Closing statement**

Swan Hill District Health recognises the importance of implementing a robust Modern Slavery framework and is committed to continually improving our approach, assessment and awareness to reduce the risk of Modern Slavery in our contract, procurement and supply chains.

A handwritten signature in black ink, appearing to read 'JKelly'.

Janice Kelly,

SHDH Board Chair

This statement was approved by the Board of Swan Hill District Health on the 23 December 2025.