



Modern Slavery *Statement* 2020-21

STATEMENT

FINANCIAL YEAR
(1 JULY 2020 – 30 JUNE 2021)



ST VINCENT'S
HEALTH AUSTRALIA

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ACKNOWLEDGEMENT

This Statement is made on behalf of St Vincent's Health Australia Ltd (ABN 75 073 503 536), and all entities owned or controlled by St Vincent's Health Australia Ltd.



Who we are

Founded by the Sisters of Charity more than 180 years ago, St Vincent's Health Australia is a clinical, research and education leader working in private hospitals, public hospitals, and aged care services in New South Wales, Victoria and Queensland.

When the first five Sisters arrived in Australia in 1838 they carried with them the vision of their Founder, Mary Aikenhead, to reach out to all in need of care, but particularly those living on the fringes of our society.

Today, St Vincent's Health Australia is the largest not-for-profit health and aged care provider in Australia.

It is the legacy entrusted to us by the Sisters of Charity that continues to inspire St Vincent's Health Australia to strengthen and grow our mission.

OUR MISSION

As a Catholic health care service, we bring God's love to those in need through the healing ministry of Jesus. We are especially committed to people who are poor or vulnerable.

OUR VISION

We lead through research driven, excellent and compassionate health and aged care.

OUR VALUES

St Vincent's Health Australia's four core values are compassion, justice, integrity and excellence.

Our Commitment to addressing Modern Slavery

Modern Slavery and human trafficking is a global issue and one that remains largely hidden in Australia. Our commitment to addressing this issue as it intersects for our work in health and aged care, is a core expression of our Mission and special commitment to those who find themselves on the margins of society. Building on the strong foundations set by our initial work with Australian Catholic Religious Against Trafficking in Humans, (ACRATH), St Vincent's Health Australia remains committed to maintaining our momentum across the various components of the work that has been undertaken to date.

St Vincent's' work in this area aims at achieving systematic change in the Australian healthcare community, so that the needs of those affected by human trafficking and modern slavery can be more strategically addressed within the sector.

We are committed to:

- reducing or eliminating the risk of modern slavery occurring in the supply chains of the goods and services we procure across our health and aged care facilities.
- awareness raising and advocacy of the issue among our community and wider society, including leadership within the health and aged care sector.
- the safe identification, treatment and referral of victims of human trafficking and modern slavery who present for care at our service.
- Establishing transparent, co-operative and accountable relationships with our business partners, so that we may educate and inspire one another to transform our practices.

We aspire to see the dignity of every human person protected, so that each person may flourish as it is their right to do so.

A message from our Chair



Mr Paul McClintock AO

At St Vincent's Health Australia (SVHA), our Mission is to bring God's love to those in need through the healing ministry of Jesus with a special commitment to people who are poor or vulnerable. A special feature of the charism of our founders, the Sisters of Charity, is that they read the signs of the times and focus their love and skills where they are needed most. Responding to the needs that arise in health and aged care, especially the issues impacting those on the peripheries of our society, has always been our core business. As such, our response to the scourge that is modern slavery and human trafficking arises from the heart of our Mission. Few are more vulnerable than those who are subject to slavery and human trafficking.

Pope Francis has led the way on this issue, noting modern slavery for what it truly is - a crime against humanity. In encouraging people all over the world to remove their own 'veil of indifference', he reminds us powerfully that, "All of us are called [by God] to be free, all are called to be sons and daughters, and each, according to his or her own responsibilities, is called to combat modern forms of enslavement. From every people, culture and religion, let us join our forces,"

At St Vincent's, our commitment to work towards the eradication of modern slavery as it presents in the operations of health and aged care has always gone beyond merely meeting our legal requirements. We focus on the human beings at the centre of this issue and work to ensure that those who are victims of this exploitation have their best chance at being freed from the conditions which so grossly undermine their dignity and opportunity to flourish.

As organisations the world over now rightfully grapple with how they might best express their commitment to environmental, social and corporate governance, we are cognisant of our opportunity as the largest non-for-profit health and aged care provider in Australia to bring about positive change. We are mindful that health care workers are one of the few groups of professionals likely to interact with victims and that this places our teams in a unique position to intervene and disrupt the cycle of exploitation. As such, we continue to find opportunities to train our staff to recognise the red flags and appropriately enquire with those who present for care who are suspected victims of modern slavery. This education has led to the rescuing of various individuals, our staff being able to support the connecting of these people to appropriate services once identified as impacted by this issue. We have also realised our opportunity to support those who have survived this plight through employment opportunities within our network of hospitals and aged care facilities. In so doing, we know this has the power to transform lives.

We are very grateful to the support we've received from our colleagues in the Catholic health and aged care sector and the ways in which we've been able to advocate together. We are united in our commitment to uphold the dignity of all and we will continue to seek opportunities to collaborate. Our internal staff Advocates for Change continue

to raise awareness both internally and externally about this issue, as is noted in our Statement. This model is key to fostering our commitment within our whole staff group.

Modern slavery and human trafficking is a serious issue and the problem remains large. It is ever important that our organisation stays focused on this issue, especially because of its largely hidden nature. We are conscious not to rest on any laurels of progress that we may have already made. It will be increasingly important that we have visibility and relationships of integrity within our large and complex supply chain. These relationships and transparent data will ensure we can promote best practice and ethical commitments of our suppliers.

This, our second Statement, signals our long term obligation to work diligently to eradicate the crime of modern slavery in our midst. In this Statement, we reflect on some of our gains in the 2020/2021 financial year and importantly, commit to maintaining momentum into the future. We know that continuing to address this issue in earnest requires our utmost integrity, focus and commitment to continuous improvement. Such do the times require us to promote the dignity of all, especially those who suffer in hidden places.

Board approved Statement

This Modern Slavery Statement was approved by the Board of St Vincent's Health Australia Ltd on 2nd December, 2021. It is submitted as a joint statement by the following reporting entity:

St Vincent's Health Australia Ltd ABN 75 073 503 536

on its own behalf and on behalf of the following subsidiary or affiliated entities:

St Vincent's Hospital Sydney Limited ABN 77 054 038 872

St Vincent's Hospital (Melbourne) Limited ABN 22 052 110 755

St Vincent's Private Hospitals Ltd ABN 61 083 645 505

***St Vincent's Private Hospital Sydney** ABN 99 269 630 262

St Vincent's Care Services Ltd ABN 50 055 210 378

St Vincent's Healthcare Ltd ABN 46 095 382 791

St Vincent's Care Services Boondall Ltd ABN 15 146 972 303

St Vincent's Care Services Carseldine Ltd ABN 49 094 645 262

*affiliated entity



Mr Paul McClintock AO

2 December 2021

Reporting Criteria 1 & 2: About St Vincent's Health Australia

OUR ORGANISATIONAL STRUCTURE

St Vincent's Health Australia (SVHA) is a not-for-profit group of companies operating under the stewardship of Mary Aikenhead Ministries.

SVHA is governed by a board that sets our strategic direction and oversees compliance, legal and legislative requirements. The SVHA Board sits as the board of SVHA and of 6 of the subsidiary companies, including those that operate our private and public health facilities and services and our aged care services. It also governs the SVHA group of companies in compliance with the *Corporations Act 2001 (Cth)*, the *Australian Charities and Not-for-profits Commissions Act 2012 (Cth)*, and all other relevant civil legislation.

Our group executive aims to manage the daily operations of the organisation to the highest standard. We all work together to realise the mission of our founders to serve all in need of care.

The parent company of the group is St Vincent's Health Australia Ltd ABN 75 073 503 536.

The following are wholly owned subsidiaries of St Vincent's Health Australia Ltd:

- St Vincent's Hospital Sydney Limited
- St Vincent's Hospital (Melbourne) Limited
- St Vincent's Private Hospitals Ltd
- St Vincent's Care Services Ltd
- St Vincent's Healthcare Ltd

The following are wholly owned subsidiaries of St Vincent's Care Services Ltd:

- St Vincent's Care Services Boondall Ltd
- St Vincent's Care Services Carseldine Ltd

The following is an affiliated hospital:

- St Vincent's Private Hospital Sydney

OUR GOVERNANCE FRAMEWORK

The Executive sponsor of our Modern Slavery work is the SVHA Group Mission Leader, Dr Lisa McDonald who has convened the Anti-Modern Slavery Working Group.

The Group Mission Leader presents this work to the Executive Leadership Team of SVHA. Proceeding through the Mission, Ethics and Advocacy Committee, the Statement is presented to our St Vincent's Health Australia Board.

OUR OPERATIONS

We operate 6 public hospitals, 10 private hospitals and 23 aged care facilities in Queensland, New South Wales and Victoria. Along with three co-located research institutes – the Victor Chang Cardiac Research Institute, the Garvan Institute of Medical Research, and St Vincent's Institute of Medical Research – we work in close partnership with other research bodies, universities, and health care providers.

SVHA employs around 22 000 staff and operates more than 4,892 hospital beds and residential aged care beds. In our hospitals, we provide more than 1 million episodes of care for patients each year.

We are a clinical and education leader with a national and international reputation in medical research. Our areas of expertise include heart lung transplantation; bone marrow transplantation; cardiology; neurosurgery; cancer; clinical genomics; HIV medicine; palliative care; respiratory medicine; mental health; drug and alcohol services; aged psychiatry; homeless health; and prisoner health.

OUR SUPPLY CHAIN

SVHA has a diverse and complex global supply chain – our largest suppliers operate mainly in the Asia-Pacific region, South Asia, Northern, Southern and Central America, Europe and Australia. We source over \$1billion per annum in clinical and non-clinical goods and services across almost 16,000 suppliers.

Our clinical supply chain comprises general medical and surgical consumables, drugs and pharmacy, pathology and laboratory, medical devices, medical imaging, surgical equipment and prostheses/implants, through to wound care, dressings, intravenous products, airway management, medical gases and robotics. Our non-clinical supply chain encompasses ICT, facilities maintenance, cleaning, food and beverage, linen and laundry services, uniforms and equipment servicing and repairs as well as corporate overheads such as office supplies and travel.

A "centre led" Procurement Team, Group Procurement Services, organises and manages "common use" contracts covering a substantial proportion of clinical and non-clinical spend across the Group. Group procurement also manages the Group's catalogue of material goods holding over 120,000 material items. Distributed on-site supply chain teams manage day to day materials management and supply as well as local purchasing, with facilities management procurement also at a local level.

Our two major public hospitals in Sydney and Melbourne have access to respective State Government Procurement arrangements which they access directly. Our Group Procurement Services team is responsible for selecting and appointing common use suppliers of all commodities and services used by the group. We prefer to develop longer-term partnerships with our suppliers, while continually assessing alternative sources of supply. Competitive tender processes are used to monitor the marketplace and potential suppliers and only those suppliers who can meet our standards are appointed.

Reporting

Criteria 3: Modern slavery risks in operations & supply chain

OPERATIONAL RISKS

Our Operations

Regardless of the form of exploitation, research shows that health care providers are one of the few groups of professionals likely to interact with victims of human trafficking and modern slavery. However, there are barriers that exist within health care settings, both here in Australia and internationally, which hinder the identification of victims of trafficking and the delivery of appropriate treatment and support to this vulnerable group.

We acknowledge that the harm caused by exploitative activities means that a person who is trafficked has an increased likelihood of presenting to a hospital. We also recognise that we are in a unique position to intervene and disrupt the cycle of exploitation.

We see that we have a role in disrupting this cycle of exploitation and, as such, continue to refine our Clinical Pathway and find various ways to equip our frontline staff with the training and awareness capabilities for the identification and referral of victims of modern slavery.

Our People

Our values are evident in the way we behave, care for our patients and residents and interact with each other within the SVHA community.

We are confident that our risk of modern slavery through our internal staff is low due to a range of policies, systems and practices we have in operation. These include Human Resource policies so that all staff are paid at award rates (or above) according to their role and qualification. All employment information is managed through our HR Information System and Payroll System to manage our staff and their relevant employment and pay details. We also operate Kronos, our time management system, the intended purpose of which is to manage rosters and pay our staff accurately for the hours that they work. **Other relevant policies and frameworks we have in place include:**

- Code of Conduct
- Whistle-blower policy
- Ethics Competency Framework
- Applicable Enterprise Bargaining Agreements

Regarding employment law, all of our HR teams strive to remain up to date on relevant legislation and review our contract templates and obligations on a regular basis. Where an employment law specialist is required, we seek external assistance as required. Regarding visa management, we endeavour to carry out all our recruitment and employment operations

in line with relevant visa management guidelines outlined by the Australian Government and seek external specialist advice if required.

SUPPLY CHAIN RISKS

SVHA remains committed to taking steps to identify and eradicate modern slavery and human trafficking from our supply chain.

Given the nature of our business, and the types of goods and services we procure, SVHA acknowledges that our risk to modern slavery practices across our supply chain is very real. Therefore, investigations into the supply of goods and services at risk to modern slavery and human trafficking continues to be a focus of the Working Group.

During this current reporting period, SVHA has identified that our highest risk is the lack of transparency we have over our own supply chain, our lack of ability to assess the origins and supply channels of our bought in goods and services and, in turn, the lack of visibility and awareness our suppliers have over their own supply chains.

Prior to the implementation of the Modern Slavery Act, SVHA undertook an initial supply chain assessment as a baseline exercise. This was reported in our previous statement. As a manual audit, it lacked the ability to replicate the process at scale on an ongoing basis. As such, SVHA is now exploring ways to identify further risks across our supply chain, past the initial deep dive of our top 50 suppliers. We recognise that our exposure to risks may be increased simply due to our challenges with supply chain transparency and risk assessment reporting capabilities.

SVHA also recognises that we do not currently have fully automated processes or systems in place capable of supporting us with supplier management and contract compliance. A summary of the measures we are taking to address these supply chain risks are provided in section 4, below.

OUR COVID-19 RESPONSE

St Vincent's Health Australia continues to play our part in the national response to the pandemic and is working closely with State Governments to help keep our patients, visitors, staff and doctors safe from COVID-19. Our commitment to providing professional and compassionate care to the most vulnerable and disadvantaged members of our community endures during this pandemic.

Our critical role in this pandemic, has seen the increase in demand for personal protective equipment (PPE) including things such as medical gloves, masks, and gowns. This means that there are added pressures on our supply chain, and our suppliers, as demand for these items increases across the globe.

While we do continue to seek assurances that specific measures are in place for high-risk suppliers, including that the appropriate controls and protections are in place, that they can provide audit reports when required and have memberships to platforms such as Sedex, SVHA acknowledges that these unprecedented times come with increased risk exposure to modern slavery.

SVHA continues to work with suppliers with whom we have existing relationships. We have not sought to make drastic changes to our supply chain during this time, but have attempted, where possible, to reduce our reliance on high volumes of disposable gowns and PPE, and continue to work closely with our existing supply partners to ensure we are not adding more undue pressure to already complex, existing supply challenges.

Reporting Criteria 4:

Actions taken to assess & address risk

SVHA is committed to reducing and working towards ultimately eradicating modern slavery within our operations, business partnerships and supply chain. As such, our commitment to this issue is facilitated by our internal Anti-Modern Slavery Working Group.

The values of the Working Group are underpinned by:

- Respecting and protecting the life and dignity of workers trapped in modern slavery everywhere;
- Working towards the Common Good and actively collaborating with relevant groups in government, business and community sectors; and
- Open, respectful and inclusive sharing of our learnings and resources with other entities.

In keeping with the invaluable work started with ACRATH in 2017, the Working Group has three key objectives:

1. The safe identification, treatment and referral of victims of human trafficking and modern slavery who present for treatment,
2. Investigations of the supply chain of services and goods used that are liable to modern slavery and human trafficking and develop a plan to address these issues,
3. To incorporate suitable activities (awareness raising and prayer) across the organisation to increase recognition of the issues and give staff the opportunity to take action in the workplace (and beyond) to help eliminate human trafficking and modern slavery.

The Working Group continues to focus on the development, implementation, monitoring and review of SVHA's Modern Slavery Policy and the objectives are supported by actions and timeframes.

SUPPORT FOR VICTIM-SURVIVORS – AWARENESS RAISING AMONG CLINICAL STAFF

SVHA continues to prioritise awareness and training measures that support our frontline staff to recognise and respond to victims of trafficking who present to our services. Significant development has occurred during this reporting period to develop a Modern Slavery Training session for our clinical staff. This training has been developed in partnership with ACRATH and will be available in the second half of 2021.

Growing awareness among our established Modern Slavery Advocates for Change has generated broader understanding of the issue and empowered our frontline staff to leverage locally available communication channels to help staff to recognise and address modern slavery. **The efficacy of our internal awareness raising has been evidenced by several cases of survivors who attended St Vincent's facilities and were able to be rescued from modern slavery, these included;**

- A woman from South East Asia presented to our Emergency Department, fearful of her husband who had threatened to report her to police about her visa and she had separated from him. Our team supported her to access family violence support which she was fearful of doing. She reported she was working for a

friend at a club, but the health care workers weren't able to reach her by phone. She sent text messages stating she was being drugged and forced to work at the club and that she had been to the police. She was able to communicate to the health care worker that she was leaving the country to return home; the police were contacted who confirmed that she had already left Australia for her country of origin.

- A woman, who speaks only Mandarin, lives on the outskirts of the city with her Australian husband. When her husband was admitted to hospital she stayed with her step daughter, who became concerned about her working conditions at a massage parlour and considered she was vulnerable. A Social Worker at St Vincent's was notified who spoke to her with a Mandarin interpreter and she was able to communicate she had her passport and Medicare card; knew about what type of visa she had; is employed as a masseuse and is being paid; has regular contact with her family in China and her husband is her sponsor. She reported she communicates with her husband through a translation app and didn't show any signs of being fearful or controlled in any way. The Social Worker considered she was assertive and in control of her situation.
- A woman from South East Asia was found on the streets in an altered state and was taken to our Hospital for treatment. She had previously worked at a brothel that had closed due to COVID-19 and had subsequently found herself homeless. She reported her husband was abusive; he had sent her to Australia first so she could then sponsor him; he controlled her access to money, passport, flights and her child which he had kept with him. At first he paid for her accommodation while she was studying but when he stopped paying her rent she was forced to work in the brothel. Our team identified these red flags, contacted the Australian Federal Police (AFP) who visited the client in the Emergency Department. The AFP provided trauma-informed care and identified her as a victim/survivor of human trafficking; they referred her onto the Red Cross for ongoing care.
- A man from a south island nation had come to Australia on a working visa to pick fruit.

He was admitted to our hospital with neurological symptoms; was found to have a lesion and had surgery to remove it, with the plan to return to work. On further investigation it was found he wasn't being paid correctly; was having expenses deducted from his pay, was denied access to medical care, wasn't allowed to leave the work site and expected to work while he was unwell. He was identified as a victim of modern slavery and he was educated about his work rights and was able to identify other workers in the same position as him. He is being supported by the community, has access to medical care, is recovering well from his surgery and has been linked with Anti-Slavery Australia who are assisting him with his visa and exploring whether he wants to pursue legal action against his employer.

In addition, one of our Modern Slavery Advocates for Change has fostered a working relationship with a United States based clinician, Dr Danielle Bastien, regarding her Human Trafficking Objective Screening Tool and Policy. This is just one example of important sharing of experience and resources that we are promoting within the healthcare sector for the improvement of responses to victims who present to our service.

The training delivered in the second half of 2021 will be a significant opportunity to gather expressions of interest for more staff to become Modern Slavery Advocates for Change.

Through our ongoing collaboration with ACRATH, SVHA has also been able to support a number of people impacted by human trafficking to find employment opportunities within our facilities working sensitively with them to ensure they had a positive experience of the recruitment process and felt supported at each step.

SUPPLIER RISK MANAGEMENT PLATFORM – SEDEX AUSTRALIA

Challenges around supply chain transparency is a current and real risk to SVHA, thus we are engaging supplier risk management platform, Sedex, to support us with the monitoring, assessment, and mitigation of risks across our supply chain.

Through Sedex, SVHA will have the ability to map our supply chain, identify high risk suppliers, and request our high-risk suppliers to conduct third party social and ethical audits. Sedex is unique in the fact that it supports visibility of ethical and responsible business practices across multiple levels of the supply chain, including the ability to conduct physical site audits in the country of origin and regions where our suppliers source from.

SUPPLIER AND CONTRACT MANAGEMENT PLATFORMS

In addition to Sedex, St Vincent's has acquired the contract management platform, Open Windows which is in implementation phase across our supply base. This will allow suppliers to St Vincent's to operate on the latest terms, conditions, controls, and policies – which will also improve contract compliance and create auditable trails and support risk and compliance monitoring.

Open Windows will also enable greater effectiveness in supplier onboarding processes, ensuring validation and certification tools. It is also the longer-term intention to leverage connection between both Sedex and Open Windows, further supporting SVHA's supplier risk management approach across our supply chain.

Additionally, Open Windows has an automated Modern Slavery actions module enabling SVHA to conduct an annual (or more frequent survey) audit of all contracted suppliers. This will ensure that all suppliers have reported confirmation of the status of policy and compliance as well as addressing action items in a timely manner.

The implementation of SEDEX and Open Windows is a key enabler for increased and meaningful supplier engagement driving improved visibility and pointed activity to address areas of concern

DIRECT SUPPLIER ENGAGEMENT

Group Procurement strives to develop long-term partnerships with our supply partners and care is taken to ensure that suppliers remain the best all-round provider to our organisation. As such, we believe in engaging with suppliers directly and discussing openly and honestly when issues are identified. It is important for SVHA to continue to work with our supply chain to identify our risks and understand how we can educate and support our suppliers to eradicate issues together.

SVHA has engaged in direct supplier conversations, remediation and resulting changes to the supply chain for gloves. Supply shortages, pricing issues, known adverse labour practices and the need to increased bulk buying from new offshore sources led SVHA to use Sedex allowing us to transparently source a bulk volumes from a Sedex noted supplier that demonstrated sound and equitable labour practices as well as affirmative responses to prior audit recommendations.

As part of these ongoing conversations, SVHA utilises resources to assist with education of our key supply partners. These describe what modern slavery is, how it affects our supply chain, what SVHA's commitment is, as well as what we expect from our suppliers and contractors.

ST VINCENT'S HEALTH AUSTRALIA MODERN SLAVERY POLICY

The development of our first ever Modern Slavery Policy supports SVHA's broader commitment to working towards eradicating modern slavery from within our operations, business relationships and extended supply chains. This Policy also aims to provide a robust framework to ensure governance and compliance with the reporting requirements of the Modern Slavery Act.

At time of reporting, the Policy is being circulated internally for consultation and is expected to be presented to our Board for final approval early 2022.

MODERN SLAVERY E-LEARNING MODULES FOR OPERATIONAL STAFF

Levering our existing HR platform, Workday, SVHA has begun the roll out of modern slavery e-learning modules to SVHA operational staff. Modules currently on the platform include Modern Slavery 101, Business Relevance, Implementing a Modern Slavery Risk Management Program and Grievance Mechanisms & Remedy.

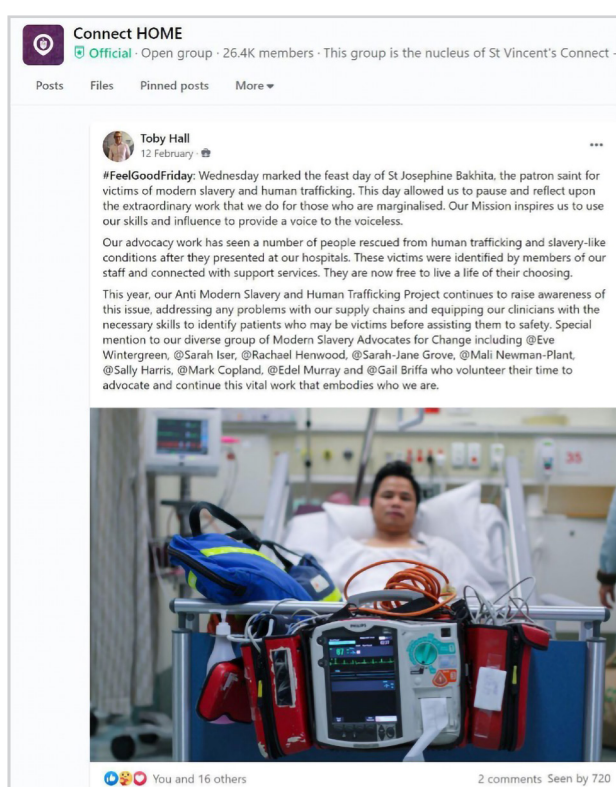
In line with our Action Plan, targets are in place to ensure that all SVHA Supply Managers and Facilities Managers have undertaken at least the first e-learning module (Modern Slavery 101) by December 2021.

AWARENESS RAISING

Raising awareness of modern slavery across St Vincent's and in the wider community, continues to be a key strategic objective of the SVHA Anti-Modern Slavery Working Group (Objective 3).

Awareness raising across SVHA takes on various forms including encouraging staff to attend relevant conferences and webinars as well as awareness of ethical purchasing choices at key times such as Christmas (promotion of the option to buy local and choose gifts that come from supply chains free from slavery), the feast day of the patron saint of slavery victims St Bakhita (general awareness raising of the issue of human trafficking and modern slavery and our organisational commitment to reducing and eradicating it) and Easter (promotion of chocolate purchasing choices that are fair-trade, certified slavery-free).

Our Group CEO, Toby Hall sees our work in this area as a key expression of our Mission and has also contributed to awareness raising for staff. See below and example of one internal communicate:



CATHOLIC PARTNERSHIPS

During this reporting period, SVHA continued its memberships with the Australian Catholic Anti-Slavery Network (ACAN) and commenced participation in the Catholic Health Australia committee established to consolidate efforts across the Catholic Health and Aged Care sector. As part of our ACAN membership, SVHA leveraged valuable ACAN resources and networking opportunities.

APPLICATION FOR GOVERNMENT GRANTS

In April 2021, SVHA submitted an application to the National Action Plan to Combat Modern Slavery 2020-25 Grant Program - Round One Grant Opportunity – Stream 1. The title of our application for the project was ‘Development and implementation of an intervention and support program for modern slavery victims-survivors who present to frontline health care services’. In August we were disappointed to receive the message from the Commonwealth Government that our application was unsuccessful. We plan to apply for funding for a similar project when the opportunity is available to us again.

Reporting Criteria 5: Effectiveness Assessment

SVHA is committed to measuring the effectiveness of its work to combat modern slavery and reporting against our goals currently takes place at our national Anti-Modern Slavery Working Group.

Through the implementation of SVHA's Modern Slavery Policy (slated for early 2022) SVHA will further progress, apply, and manage our governance framework for assessing effectiveness.

These measures include but are not limited to:

- The number of Supply and Facility staff trained in Modern Slavery 101 e-learning
- Increased awareness of modern slavery at executive level across all SVHA facilities
- Number of self-assessments submitted to Sedex by suppliers
- Development of Supplier Risk Management Program, and regular review of its effectiveness
- Number of mitigation actions, including site audits, undertaken across our supply chain
- The number of victims of modern slavery that are identified and rescued from harm
- The number of Modern Slavery Advocates for Change who have received awareness and referral training and across the number of SVHA facilities this applies to,
- Ongoing review of the effectiveness of the Clinical Pathway

SVHA aims to develop further governance frameworks to monitor and track the effectiveness of these above measures and will continue to capture data and refine our processes, as we progress our work in this space.

Reporting Criteria 6: Process of consultation with entities owned or controlled

As noted under Reporting Criteria 1 and 2, SVHA is a group of companies bringing together private and public health facilities and services, aged care services, and related mission activities which are committed to helping those who are poor and vulnerable. SVHA is governed by a board that sits concurrently as the board of SVHA and of 6 of the subsidiary companies, including those that operate our private and public health facilities and services and our aged care services. The Group CEO and divisional CEOs of the public hospitals division, private hospitals division, care services division and other senior executives make up the Executive Leadership Team (ELT) of SVHA which meets monthly. Functions of the ELT include making strategic decisions and setting the policy direction for the SVHA group.

As a result of the common board and the ELT structure, underpinned by our shared mission and values, there is a general consistency of policies and processes across the various entities making up the group.

Consultation as between the parent company St Vincent's Health Australia Ltd and the subsidiaries and affiliates in the preparation of this statement has occurred via the common board and ELT structures as described above and Group Procurement, as well as the Board's Mission Ethics and Advocacy Sub-Committee and the Anti-Modern Slavery Working Group which comprises staff drawn from the different entities, facilities and group functions. In light of these structures, SVHA considers it is reasonable and appropriate for St Vincent's Health Australia Ltd to provide this joint statement on behalf of all reporting entities in the group, including a consolidated description of their actions to address modern slavery risks.

Reporting

Criteria 7: Other

St Vincent's continues to remain engaged with advocacy in this area. Including our ongoing relationship with ACRATH and regular attendance at their monthly 'Conversation Series' which is a series of conversations about their Advocacy work against Modern Slavery (Forced Labour, Human Trafficking and Forced Marriage).

STATEMENT

svha.org.au

