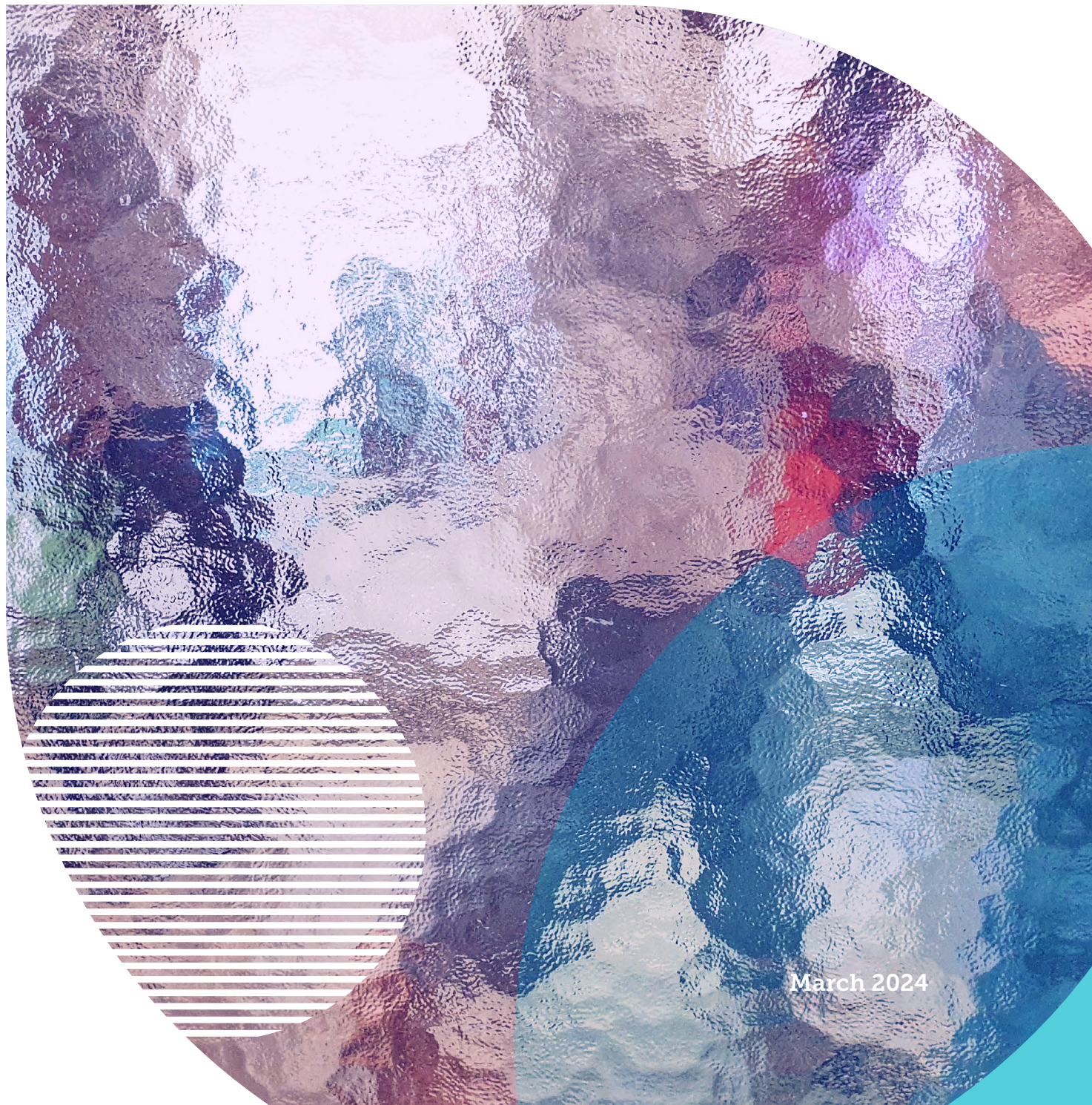


Modern Slavery Statement



March 2024

North Western Melbourne Primary Health Network

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Disclaimer

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Acknowledgements

We acknowledge the people of the Kulin nations as the Traditional Custodians of the land on which our work in the community takes place. We pay our respects to their Elders past and present.

We also recognise, respect and affirm the central role played in our work by people with lived experience, their families and/or carers.



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Introduction

Modern slavery and the Act

In 2018 the Australian Government passed the Modern Slavery Act 2018, which requires companies with consolidated revenue of over \$100 million to annually report on the risks of modern slavery within their operations and supply chains. Furthermore, the Act requires these companies to outline the actions they have taken and plan on taking to address these risks.

The Act defines modern slavery as including 8 types of serious exploitation:

- trafficking in persons
- slavery
- servitude
- forced marriage
- forced labour
- debt bondage
- deceptive recruiting for labour or services
- the worst forms of child labour, meaning situations where children are subjected to slavery or similar practices or engaged in hazardous work.

Melbourne Primary Care Network

Melbourne Primary Care Network Limited, trading as North Western Melbourne Primary Health Network (NWMPHN) is an Australian public company, limited by guarantee. It was registered in Australia in September 2011.

Our primary place of business is Level 6, 737 Bourke Street, Docklands, Victoria, 3008.

We are registered as a charity with the Australian Charities and Not-for-Profits Commission (ACNC), the national regulator.

For the purposes of the Act, this statement is submitted for a single reporting entity, Melbourne Primary Care Network Limited, ABN 93 153 323 436 and in accordance with Section 13 of the Act.



North Western Melbourne Primary Health Network

NWMPHN is one of 31 primary health networks in Australia working to improve integration of health services and to better coordinate care. NWMPHN commission health services to deliver better, more accessible care across Melbourne's northern, western and inner-city areas. The organisation does this through a commitment to transforming primary care, using evidence-based commissioning and active partnerships with community and health sector stakeholders, while striving for organisational excellence and impact.

NWMPHN works closely with general practices, mental health, allied health and other primary health care professionals to identify service gaps. Then we collaborate to co-design and fund innovative and effective solutions that make it easier for people to get the care they need.

With a focus on at-risk members of the community, the organisation is driven by a vision for a primary care system that is person-centred, comprehensive, coordinated, accessible, high quality and safe. NWMPHN's approach to decision-making and resource allocation is guided by the Quintuple Aim for health care improvement – a widely accepted summation of universal health practice priorities.

NWMPHN acknowledges that achieving these aims requires ongoing, progressive, incremental changes to the Australian health care system. We are committed to working with our partners and the community to make these changes a reality. NWMPHN is guided by our values of equity, respect, collaboration and innovation.

The Quintuple Aim

The Quintuple Aim holds that any health care system must deliver:



Improved consumer health care experience



Improved health equity



Improved population health outcomes



Improved health care provider experience



Improved health system cost efficiency and sustainability



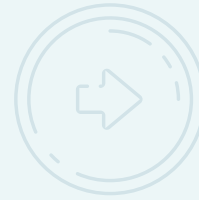
Core values

Our ethical commitment is based on 3 core values: justice, respect for persons, and responsible care. For these to have a meaningful impact, they have to be expressed through a certain number of business principles applied in our sphere of activity. Our ethics, expressed through these values, are demonstrated and practiced every day.

1. **Justice** means being impartial and using power fairly for the common good rather than abusing, discriminating against or exploiting people.
2. **Respect for persons** means being honest and treating people courteously, so that they maintain their dignity and their rights are upheld, rather than harassing, intimidating or abusing them.
3. **Responsible care** means protecting and managing with care human, natural and financial resources, making sure decisions and actions do not harm the short and long-term wellbeing of people and resources.

NWMPHN is committed to maintaining an environment in which any person, without fear of retaliatory action, can report instances of improper conduct or other wrongdoing they believe are occurring.

NWMPHN does not tolerate improper conduct or other wrongdoing arising by its employees or officers, nor victimisation or the taking of detrimental action against those who come forward to disclose such conduct.



Our commitment

NWMPHN accepts that modern slavery happens at the most extreme end of the working spectrum. It involves the gravest abuses of human rights and serious crimes, having severe and often lifelong consequences for its victims. The term modern slavery is used to describe situations where coercion, threats or deception occur.

NWMPHN further acknowledges that modern slavery occurs when coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery cases do not always involve physical violence; perpetrators often use subtle threats and psychological pressure to control victims.

NWMPHN is committed to eliminating modern slavery in operations and supply chain, and managing supplier risks to not engage in modern slavery or the associated risks. NWMPHN is committed to consistently reviewing and strengthening processes and systems to minimise the risk of human rights infringements.

Our journey so far

NWMPHN works collaboratively with other primary health networks in Victoria and Tasmania. The respective corporate managers meet monthly, and discuss legislative compliance, among other matters. This process identified that some networks may be approaching the \$100 million threshold for compliance reporting. NWMPHN's annual financial audit confirmed the threshold was achieved. Subsequently in November 2023, NWMPHN entered into a funding agreement that require NWMPHN to have Modern Slavery controls in place for any future contracts associated with the specific funding.



Structure, operations, and supply chains

About commissioning

Funders, including the Australian Government Department of Health and Aged Care (DoHAC), entrust NWMPHN to commission needs-based, locally appropriate, consumer-centred and evidence-based solutions to address the health needs of the region.

Our primary focus is the health and wellbeing of the 1.9 million people who live within our 3,212 square-kilometre catchment area. However, we are also often tasked by our funders to design, coordinate or oversee programs that operate across the state or throughout the country.

Probity and good governance are at the heart of the organisation. To ensure best practice and transparency in NWMPHN's operations, we are overseen by our Board of Directors, and assisted by clinical and community councils and several expert advisory groups.

The Board is NWMPHN's governing body. It is committed to the organisation's vision of ensuring that the health care needs of communities are met, so that people receive the right care, in the right place, at the right time.

NWMPHN's Executive Team comprises of:

- Chief Executive Officer;
- Executive Director, Health Systems Integration;
- Executive Director, Service Development and Reform;
- Executive Director, Systems; and
- Executive Director, Insight, Performance and Digital Services.

The organisation employs 162 people and engages up to 10 contract staff through recruitment agencies. As of December 2023, NWMPHN manages 286 active contracts in its Commissioning Management System.



Population
1.9 million



28%
Projected
growth by
2030



220+
Languages
spoken

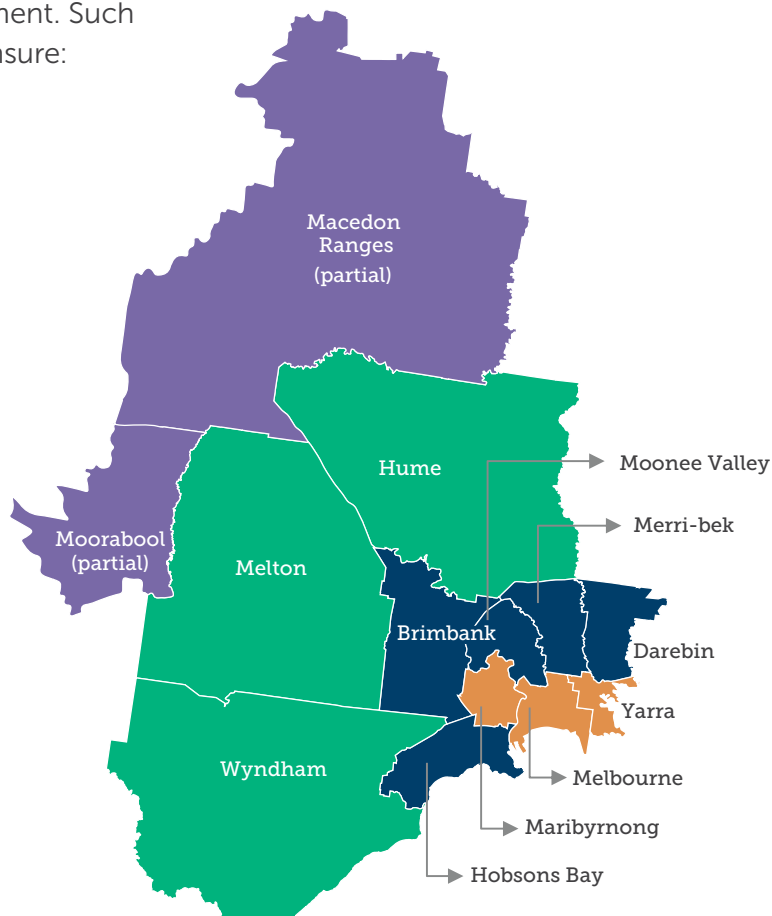


NWMPHN's supply chain processes are driven by our approved Procurement Strategy, built on our Commissioning Framework, which describes the methodology adopted by NWMPHN for the commissioning of health services. The key objectives of procurement are to deliver:

- value for money
- accountability and transparency
- probity.

NWMPHN has established appropriate governance arrangements, including review and approval pathways for procurement. Such governance arrangements aim to ensure:

- accountability
- transparency
- standardisation and consistency
- probity and integrity of process.



Code of conduct

NWMPHN's Code of Conduct for our stakeholders is a set of rules or principles establishing the norms for proper conduct. In the context of procurement, a code of conduct for prospective contractors would bolster probity and integrity of the procurement process.

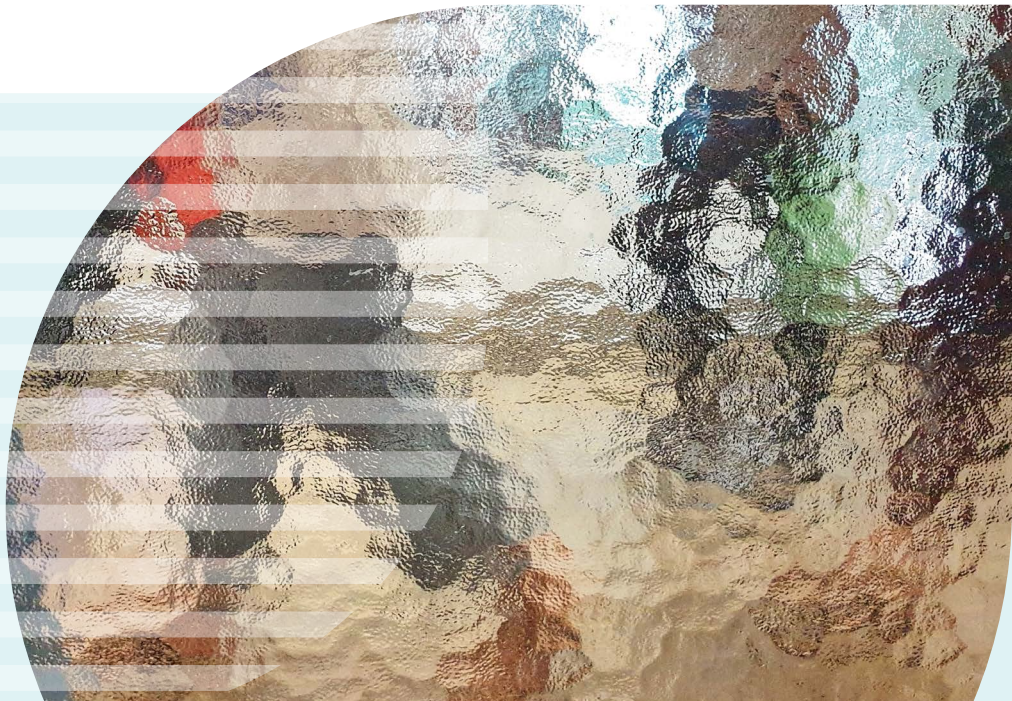
NWMPHN will create and implement a contractor code of conduct. This will be included as a criterion for bidders in tenders to confirm compliance. It will state the ethical and professional expectations of bidders to be considered for opportunities to work with NWMPHN.

NWMPHN's Executive Director, Systems, has overall responsibility for procurement, including the effective implementation of our procurement strategy and procurement policy, as provided for in the said policy.

For a commissioning process, the relevant executive director deploys sufficient resources for effective and efficient procurement, and is responsible for ensuring integrity and probity of process and procurement outcomes.

The Executive Director, Systems, facilitates approval by the executive team including documents (including templates) for use in procurement, and provides instructions for the proper conduct of procurement, including through the procurement roadmap.

NWMPHN has the responsibility and commitment to continually improve and embed human rights into our business practices and supply chains. NWMPHN's employee code of conduct is included in our Human Resources Manual. The code of conduct provides a basis for shared values and principles that motivate and guide our day-to-day undertakings and are critical to our success as an organisation. They are described in our ethics and conduct statements. The code of conduct complies with the requirements of the Public Service Act 1999 (Part 3, Section 13) and is applicable to all NWMPHN staff, contractors and consultants.





Whistleblower policy

Our protected disclosures (whistleblower) policy:

- sets out the protections and reporting arrangements for whistleblowers;
- enables NWMPHN to deal with reports from whistleblowers in a way that will protect the identity of the whistleblower and provide for secure storage of the information provided;
- establishes measures to protect whistleblowers against any detrimental action or victimisation as a reprisal for making a disclosure by any person internal or external to NWMPHN;
- helps to ensure NWMPHN maintains the highest level of ethical behaviour and integrity.

Whistleblower reports may include instances and reports of modern slavery. The policy creates a supportive environment where people feel safe to speak up, which reinforces NWMPHN's culture and reduces any associated risks, including the risk of modern slavery.

NWMPHN has extended its accountability to ensure that in the conduct of business our people are aware of the risks of modern slavery in our operations and supply chains, and actions taken by us to address these risks. NWMPHN intends to be equally satisfied in ensuring compliance with modern slavery requirements.

The responsibility for managing and ensuring modern slavery compliance in NWMPHN operations and supply chain rests with the Executive Director, Systems. The Executive Director Systems updates the CEO and reporting to Finance Audit and Systems (FAS) committee on legislative compliance.

Addressing the risks

Risks of modern slavery practices in the operations and supply chains of NWMPHN.

NWMPHN's commissioning processes and protocols can be adjusted to respond efficiently to a variety of changing purposes, circumstances and conditions.

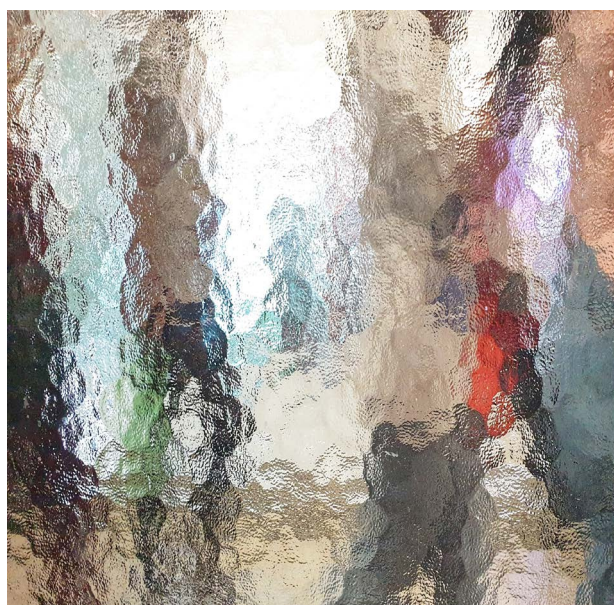
NWMPHN has considered the modern slavery list of industries and list of high-risk countries, as provided in the [Global Slavery Index 2023](#), in determining the risks of modern slavery in our operations and supply chain. We have further considered information and resources made available through other organisations. These include [Transparency International's Corruption Perceptions Index](#); [Global Compact Network](#); the [International Labour Organisation's Global Estimates of Modern Slavery 2021](#); [Hidden in Plain Sight](#), the report of the 2017 parliamentary inquiry into establishing a Modern Slavery Act in Australia; the [Commonwealth Modern Slavery Act 2018](#), [Guidance for Reporting Entities](#); and the [Attorney-General's Department Report of the statutory review of the Modern Slavery Act 2018](#), (the first three years) completed June 2023.

NWMPHN's primary leading suppliers rest in the health care providers and services industry and the charity, not-for-profit industry. These are not high-risk industries for modern slavery. The suppliers are also Australia-based, which is not a country of high risk to modern slavery. To a lesser extent other industries that we engage with locally that are at high risk of modern slavery include information technology supplies and services, and recruitment services.

Although our suppliers are based in Australia, we acknowledge that the 2023 Global Slavery Index "estimates that on any given day in 2021, there were 41,000 individuals living in modern slavery in Australia. This equates to a prevalence of 1.6 people in modern slavery for every thousand people in the country.

"Within Asia and the Pacific, Australia is ranked 26 out of 27 countries in terms of prevalence of modern slavery, and 149 out of 160 countries globally. In the financial year ended 30 June 2022, authorities received 294 modern slavery reports. While this represents the highest number of annual reports ever received, it suggests that modern slavery remains underreported in Australia given the estimated prevalence rate of modern slavery'."

NWMPHN has taken this into consideration in performing a modern slavery risk assessment of our suppliers and for further development of our modern slavery framework.



Actions taken

Actions taken by NWMPHN to assess and address modern slavery risks, including due diligence and remediation processes

In 2023, NWMPHN, working in consultation with Grant Thornton Australia, conducted a modern slavery risk assessment of our operations and supply chain, creating a modern slavery framework, which assisted us in the preparation of this, our first modern slavery statement.

The process was driven and headed by our Executive Director, Systems, supported by our Director Procurement, Director Finance, Communications Manager, Training Manager and Quality and Risk Lead, responsible for their respective disciplines to ensure NWMPHN integrate Modern Slavery legislative requirements, working collaboratively as a workgroup.

The assessment comprised 2 elements:

1. It identified existing risk management policies and procedures within NWMPHN and determined whether these can be broadened to include the risks of modern slavery, through ethical sourcing, quality standards or other compliance reporting.
2. It included a risk assessment of our current suppliers for a 12-month period from 1 July 2022 to 30 June 2023.

In conducting a risk assessment of existing risk management policies and procedures, we reviewed all relevant policies including the:

- code of conduct for our stakeholders
- feedback and complaints policy
- feedback and complaints process
- human resource information system user manual for staff
- human resource manual code of conduct
- procurement policy
- procurement strategy.
- and the protected disclosure (whistleblower) policy.

NWMPHN updated these policy documents where required, to refer to and include the requirements of the Act. We further developed a modern slavery policy, and drafted a modern slavery framework document. The framework will assist us in the preparation and drafting each annual modern slavery statement. These will serve as records of actions taken, identifying strengths and weaknesses, and reactions to modern slavery issues and incidents.

Our framework covers due diligence, risk assessment, prevention and mitigation, plus approaches to training, to ensure effective operations. This applies not only to our own business, but also to that of our suppliers.



In performing the risk assessment, we conducted a desktop review of 50 of our top spend suppliers which collectively account for 73 per cent of our total spend (excluding payments made to the Australian Tax Office). Prior to conducting the review, the ABN number and ABN listed name for each of the 50 suppliers was confirmed with ASIC public records. No inconsistencies or anomalies were identified.

45 of the top 50 suppliers fit within the health care providers and services, and charity, not-for-profit industries. As noted, these are low risk industries for modern slavery. All top 50 suppliers are Australia-based and do not have operations outside of Australia, according to our risk assessment findings.

NWMPHN considered risks that may potentially cause, contribute to, or be directly participating in modern slavery practices, consistent with the Act and the Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities.

The risk areas included: financial; industry; country (geographic location); the use of sub-contractors; and, if applicable, evidence that the supplier has submitted a modern slavery statement in Australia.

The results of our review identified that 49 of the 50 suppliers scored an overall 'low risk' modern slavery rating. The remaining supplier scored a 'moderate' risk rating. This is based on what was determined by us using publicly available records and information we had previously obtained from our suppliers.

Supplementing our policy review and risk assessment, NWMPHN developed a modern slavery supplier questionnaire. It contains enquiring and exploratory questions, rather than generic modern slavery questions. It also includes a risk rating for each answer provided, and requires the submission of supporting documents to us where applicable.

We believe this is a vital step in identifying and, where applicable, eliminating human trafficking and modern slavery amongst our suppliers, where there is any warning or the slightest suspicion that this may be occurring.

NWMPHN has further developed a modern slavery introductory training pack for internal employer training. This will be implemented once finalised and approved.

Assessing effectiveness

Assessing the effectiveness of actions taken by us.

NWMPHN has described actions taken in the immediate assessment of modern slavery risk within our operations and supply chain. This includes policy review, drafting new policies, and conducting a risk assessment for our top spend suppliers. In doing so we have mapped out key parts of our operations and supply chains to improve our understanding of potential modern slavery risks.

All new and existing suppliers, subcontractors and consultants, where necessary, will be vetted for modern slavery risks through the completion of our modern slavery questionnaire and the provision of supporting documents where applicable. This will now be a precondition to use of new suppliers.

NWMPHN will use the completed questionnaires and information obtained from suppliers to build transparent and collaborative relationships. This will further ensure that our expectations of reporting of modern slavery risks within the supplier's supply chain have been clearly communicated, and that we have satisfied ourselves that modern slavery risks have been effectively managed.

NWMPHN will review the policies that now incorporate and make provision for modern slavery compliance and ensure that staff and suppliers, where applicable, certify on an annual basis that they have read and understand these policies. We will regularly review and improve our modern slavery internal controls and procedures to monitor their effectiveness. This will include updating policies and procedures when deemed necessary.

The process of consultation with any entities the reporting entity owns or controls

NWMPHN does not own or control any other entity and consultation was not required or applicable.



The way forward

To build on NWMPHN's draft modern slavery framework, we will focus on the following areas and the extent to which these are achievable:

- Rolling out our modern slavery supplier questionnaire and review the answers and information provided. We will then undertake further actions where required and additional communications with our suppliers.
- Ensuring modern slavery introductory training is undertaken by all our staff in the next calendar year. The format of the training is still to be finalised and approved by NWMPHN.
- Performing social accountability audits. These audits will review our suppliers and subcontractors to evaluate their practices concerning the treatment of their workers, and identifying and determining any potential risks, including modern slavery and human trafficking.
- Developing internal accountability standards and procedures further, to hold NWMPHN employees and contractors accountable for non-compliance with our standards on modern slavery and human trafficking. This will include establishing consequences for non-compliance; and establishing a process to remediate such breaches.



Our reporting requirement

In this statement NWMPHN has reported against all 7 of the mandatory items required in the Act.

1. Identify the reporting entity
2. Outline operations and supply chains
3. Identify modern slavery risks
4. Identify actions taken to address risks
5. Evaluate effectiveness of actions taken
6. Consultation with controlled entities
7. Other relevant information

This statement was approved by the Board of Directors, Melbourne Primary Care Network limited on Tuesday 19 March 2024.



Associate Professor Ines Rio
Chair, MPCN Board
19 March 2024

