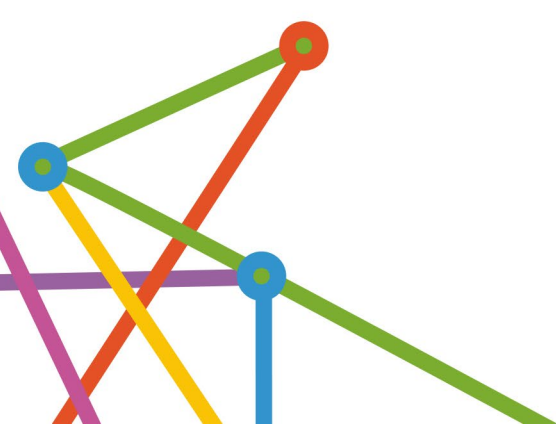




Modern Slavery Statement

Reporting Entity: **WA Primary Health Alliance Ltd (WAPHA)**
ACN: 602 416 697
ABN: 11 602 416 697

Reporting Period: **Financial year ending 30 June 2023**



Statement

This statement covers the activities of WA Primary Health Alliance Ltd (WAPHA) to understand and implement actions to minimise the risk of modern slavery and human trafficking in its operations and supply chain.

This is the first Modern Slavery Statement for WAPHA, as informed by the *Modern Slavery Act 2018* (Cth).

The purpose of this Statement is to outline our approach to assess and address the risk of modern slavery in our business operations and supply chain.

Structure

WAPHA is an Australian not-for-profit public company limited by guarantee, incorporated, and domiciled in Australia under the *Corporations Act 2001* (Cth) with its registered office at 1, 2 Hood St SUBIACO WA 6005.

WAPHA is:

- registered as a charity with the Australian Charities and Not-for-Profits Commission.
- classified as a Health Promotion Charity under the *Income Tax Assessment Act 1997* (Cth).
- endorsed as a Deductible Gift Recipient (DGR); and
- endorsed for GST, Income Tax and FBT tax concessions.

WAPHA has approximately 210 full-time equivalent employees and has regional offices in each of its Country WA sub-regions, being the Goldfields, Great Southern, Kimberley, Midwest, Pilbara, Southwest and Wheatbelt. WAPHA's expenditure budget for 2023/24 is approximately \$250 million, the majority of which is disbursed to community-based commissioned service providers to provide a range of primary health services to vulnerable Western Australians.

WAPHA does not own or control any other legal entities and no other legal entities control or own WAPHA.

As at the time of submission WAPHA has trademarks registered or in process of registration as detailed at Trademarks in this document.

Operations

General

Established in 2015 WAPHA operates Western Australia's (WA) three Primary Health Networks (PHNs), Perth North, Perth South, and Country WA. These are three of the 31 PHNs created by the Australian Government's national PHN program in 2015.

PHNs have three primary roles which are to:

- commission health services to meet the needs of people in their regions and address gaps in primary health care.
- work closely with general practitioners (GPs) and other health professionals to build the capacity of the health workforce capacity to deliver high-quality care.
- integrate health services at the local level to create a better experience for people, encourage better use of health resources, and eliminate service duplication.

Further information on PHNs can be found at: <https://www.health.gov.au/our-work/phn>.

WAPHA's undertakes its operations in Australia and almost exclusively in WA.

Primary Health Insights

WAPHA developed and operates Primary Health Insights (PHI) as the “lead agency” for participating PHNs, whose participation is voluntarily including which data sets they store on the platform.

Each PHN’s data area, called a “lockbox” is separate, individually secured, and subject to the same high level of access control and privacy safeguards as the platform. PHNs control access to their lock box and retain custodianship of their data.

PHI includes access to a range of analytical and reporting tools which participating PHNs can use to report data and insights to general medical practices and commissioned healthcare service providers.

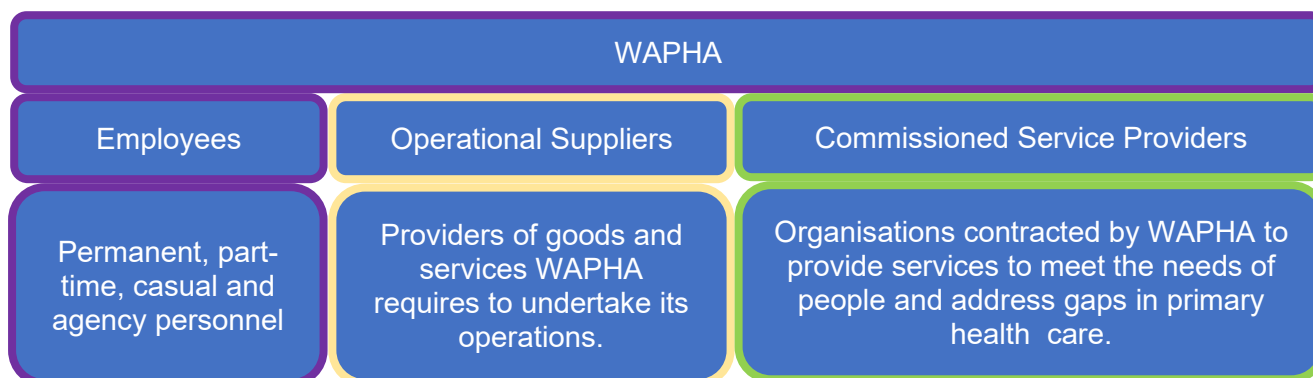
Participating PHNs fund the operation of PHI on a cost recovery basis, as well as investing in further development of the platform.

Further information can be found at: <https://www.primaryhealthinsights.org.au/>.

Supply Chain

WAPHA’s supply chains can be characterised as having three distinct branches. These are:

- persons that WAPHA employs.
- suppliers of goods and services that enable it to conduct its operational activities (Operational Suppliers); and
- organisations that it commissions (contracts and provides funding to) to provide primary health services (Commissioned Service Providers).



Operational Suppliers

WAPHA’s Operational Suppliers are typical of an office-based organisation that does not provide any physical labour services or produce, manufacture, or sell any goods.



Commissioned Service Providers

WAPHAs Commissioned Service Providers (CSPs) span a range of businesses from medium to large national organisations (such as health insurers, universities, not-for-profits, and corporate General Practice groups) to small single regional location organisations such as not-for-profit primary health service providers and General Practices.

Each of these organisations then have their own employees, contractors, and operational supply chains.

The operational supply chains of these organisations are more diverse however will typically have greater emphasis on delivery of primary health services. This can include the procurement of property, undertaking building construction projects, staff uniforms and consumables, vehicles, medical consumables, and pharmaceuticals. Many provide services (such as psychological therapies) that involve minimal or no medical consumables.

Sources of Modern Slavery Risk

WAPHAs has considered its exposure to the risk of modern slavery in relation to the three key areas identified above.

Employees

WAPHA has in place policies, procedures, and systems to ensure that all employees, including those engaged through contracts and agencies, are employed on conditions that are at or above all legislated requirements, and that it appropriately considers their eligibility to work in Australia and manages their health and wellbeing. WAPHAs financial statements audited by an external auditor on an annual basis and relevant controls assessed.

Operational Suppliers

WAPHAs has assessed its exposure to modern slavery risk through Operational Suppliers in:

- direct services from low skilled workforce (such as office cleaning, catering).
- indirect via supply chains for IT hardware (geographical regions of risk for manufacture and production of materials) and software and cloud-based services (off-shoring of labour to geographical regions with risk).
- indirect via supply chains of professional consultants, such as procurement of uniforms, cleaning, information technology (IT) hardware and cloud-based services.

WAPHAs expenditure on low skilled direct services is extremely limited and for the balance of the areas identified suppliers are large (such as Microsoft, Dell, and Oracle) or are reputable organisations.

Commissioned Service Providers

WAPHAs has assessed its exposure to modern slavery risk through Commissioned Service Providers (CSPs) in:

- suppliers to CSPs of a similar nature as WAPHAs Operational Suppliers, which they would typically require as part of operating their corporate company services.
- CSPs procurement of medical consumables and equipment, pharmaceuticals, uniforms, and other textiles.
- some CSPs (whilst less likely to be directly linked to specific services contracted by WAPHA) also operate hospital or residential services which have a much greater exposure to lower skilled and migrant workers (cleaning, grounds maintenance, food production and services etc.) as well as a far wider range of goods such as beds and linen, medical equipment, and pharmaceuticals.

Modern Slavery Statement 2023

The majority of WAPHAs CSPs are organisations who receive funding from other Commonwealth and State Government bodies and typically exist for a charitable purpose.

Contracts with CSPs require that they be compliant with legislation and, typically, that they submit financial reports accounting for the expenditure of funding provided to them by WAPHA with most required to be audited by an external auditor, based on financial and risk thresholds.

Future actions

As the commissioner of primary care services on behalf of the Australian Government, WAPHA operates in a regulated environment with contractors providers which are generally established for a charitable purpose, and operate from a strong public interest values base.

Going forward WAPHA will implement additional strategies to enhance its approach to minimising the risk of modern slavery within its supply chain through:

- undertaking more detailed and ongoing assessment of its risk exposure.
- conducting training of relevant personnel in the risks of modern slavery.
- introducing supplier assessment questions specific to modern slavery; and
- incorporating modern slavery specific clauses into standard form contracts.

Endorsement & Signature

The WAPHA board of directors approved this statement on 1 November 2023.

Signed by:







Name: Richard Choong

Role: WAPHA Board Chair





Date: 1 November 2023

Modern Slavery Statement 2023

Trademarks

Number	Visual representation	Words	Status	Classes
1893956	None.	MHConnex	Registered: Registered/protected	16, 44
2167340	None.	Primary Health Insights	Registered: Registered/protected	42
2167341		PHI PRIMARY INSIGHTS	Registered: Registered/protected	42
2167342		PHI PRIMARY INSIGHTS	Registered: Registered/protected	42
2167343		PHI PRIMARY INSIGHTS	Registered: Registered/protected	42
2167344		PHI PRIMARY INSIGHTS	Registered: Registered/protected	42

Modern Slavery Statement 2023

2210713		WAPHA CONNECTIONS COUNT CONVERSATIONS FOR A HEALTHY MIND AND SPIRIT.	Registered: Registered/protected	44
2210714	None.	Connections Count	Registered: Registered/protected	44
2222992		WAPHA SHAPE SUPPORTING HOLISTIC AND PERSON-CENTRED WEIGHT EDUCATION	Registered: Registered/protected	41, 44
2222994		WAPHA SHAPE	Registered: Registered/protected	41, 44
2237256		KAAT WER KOORT MOORDITJABINY HEAD AND HEART BECOMING STRONG.	Registered: Registered/protected	44

Modern Slavery Statement 2023

Document management

Document owner

Role	Next review date
Executive General Manager – Business Services	31/08/2024

Authorisation

Version prepared/reviewed by:		
Name	Role	Date
Jack Blythe	Risk and Assurance Manager	31/08/2023
Version authorised by:		
Name	Role	Date
Richard Choong	WAPHA Board Chair	17/10/2023

Version history

Version	Active date	Detail/changes
01	01/11/2023	First release.