



# Modern Slavery Statement

This statement is made pursuant to the Commonwealth Modern Slavery Act 2018 by West Gippsland Healthcare Group (WGHG) for the financial year **1 July 2024 to 30 June 2025**.

## About West Gippsland Healthcare Group

WGHG is a public hospital and health service provider in Baw Baw Shire, Victoria, serving over 60,000 people within the Baw Baw Shire and beyond. With approximately 2,000 staff, WGHG is the region's largest employer. The organisation operates acute, residential, and community health services, as well as the Warragul Linen Service as a commercial business unit, and is part of the Gippsland Regional Health Alliance.

Our annual reports can be viewed [here](#) where you can find out more about WGHG including Our Vision, Mission and Values.

HealthShare Victoria (HSV) is our state-wide provider of supply chain services 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 and manage common-use contracts on behalf of the state.

A significant amount of goods and services are procured through HealthShare Victoria (HSV), which manages collective purchasing for Victorian public health services.

HSV collective arrangements cover a broad range of services, equipment and supplies across a number of categories including beds, mattresses, patient trolleys, syringes, personal protective equipment (PPE), catering supplies, haemodialysis, infusion pumps, medical gases, locum agency, orthopaedic prostheses, surgical instruments, sutures, waste management services, gas and electricity and non-emergency patient transport. A full list of HSV's sourcing categories can be found at:

<https://healthsharevic.org.au/contracts-and-tenders/>

# Modern Slavery Risks in Operations and Supply Chains

WGHG's procurement of goods and services includes:

- Group sourcing under HSV collective agreements or health service-led clusters
- Direct sourcing with individual suppliers.

## **HSV Collective Procurement:**

WGHG spends over \$6 million annually through HSV, covering high-risk categories such as gloves, textiles, and medical supplies and equipment. These categories are vulnerable to modern slavery due to hazardous working conditions and labour exploitation in global supply chains.

## **Direct Sourcing:**

In relation to our direct sourcing activities, WGHG acknowledges that there is a risk of modern slavery practices, especially upstream within tier two suppliers (manufacturers for our direct tier one suppliers). Product categories such as linen and textiles is recognised as high risk due to upstream supply chain vulnerabilities. WGHG is enhancing risk understanding and mitigation in these areas.

## **Ethical Sourcing Risk Assessment:**

HSV's Purchasing Policy 5 and new Mandatory Minimum Standards require annual supplier risk assessments and capacity-building initiatives to mature suppliers ethical sourcing practices.

From 1 July 2024, the modern slavery Mandatory Minimum Standards (Standards) apply to all new HSV collective purchasing procurement activities. The Standards encourage a graduated, principle-based compliance, with collaboration between HSV and suppliers assisting to build capacity with the supplier through training and raising awareness. As part of the Standards, suppliers are required to complete an annual supplier risk assessment. Each year HSV reviews the sector's annual spend data using analytics to evaluate potential modern slavery occurrences within the health service supply chains within Collective Purchasing Agreements. This analysis (now in its 5<sup>th</sup> year) identified 693 suppliers for all health services (442 previous year). Following this analysis, HSV invited 163 collective suppliers (accessed by WGHG during the reporting period, 130 previous year) to complete the Modern Slavery Supplier Questionnaire.

# Actions to Assess and Address Modern Slavery Risks

In the latest review, 142 suppliers responded or 87% (76% previous year) whilst 1 declined (3 previous year) and 21 did not respond (25 previous year). The response rates are expected to continue to improve overtime as the mandatory minimum standards are

incorporated into HSV collective agreements. It is not unusual for a supplier to not respond to the survey particularly if they are required to lodge a Modern Slavery Statement with the Commonwealth. HSV continues to see this as not an unwillingness to co-operate but rather it is connected to varied responsibilities under the Act which includes the preparation of a statement for the Modern Slavery Register.

As an ancillary focus, this year HSV also chose to report on HSV suppliers by business size (based on full-time employees) to compare differences in maturity of modern slavery risk between size of business.

The table below shows the supplier risk assessment outcomes for suppliers over the past 3 years, outlining the profile mix of suppliers risk ratings within each risk category.

**Supplier risk ratings in percentage terms**

Risk Category	Supplier percent in each risk category		
	2023	2024	2025
Very High	1%	0%	1%
High	14%	14%	10%
Medium	56%	69%	68%
Low	29%	17%	21%

The trended assessment identifies an improving trend in the reduction in suppliers with a high to very high overall risk score (11% or 18 suppliers).

It should be noted that these results do not imply WGHG has caused or contributed to modern slavery practices, but rather, WGHG is linked to risks which exist offshore and in high-risk geographies.

HSV’s annual supplier risk assessment seeks to understand the actions suppliers have taken to assess, address and remedy Modern Slavery (MS) risks.

**Policy**

95% of suppliers that responded had modern slavery policies with 53% sharing their policies with HSV. These rates are a slight improvement on last year.

**Due Diligence**

84% have designated roles for MS risk oversight; 40% have mapped supply chains; 80% screen suppliers; 73% conduct risk assessments; 63% conduct audits that include Modern Slavery. These rate general improvements on the last year.

## **Training**

84% train staff on modern slavery; 42% extend training to supply chains; 148 HSV suppliers supplying to WGHG attended one or more engagement session covered by HSV during 2024-25.

WGHG key procurement staff continue to attend HSV hosted modern slavery community of learning sessions provided to health services over the reporting period. We attended 6 meetings during the reporting period and received presentation material from every meeting.

## **Remedy**

83% have action plans for addressing allegations. WGHG collaborates with HSV and suppliers to reduce risks and promote education.

## **WGHG Direct Spending**

WGHG also uses HSV's risk assessment tool for its direct supplier analysis. In 2025, HSV undertook supplier risk assessments of WGHG key spend suppliers on our behalf. These assessments identified 14 suppliers, of which 3 chose not to respond. One supplier was rated very high, 2 high, 5 medium and 3 low. Standard letters were sent out to the 11 risk-rated suppliers informing them of their risk rating as well as an expectation to see continued improvements in MS risks in line with the Supplier code of conduct. These suppliers were also invited to attend HSV supplier engagement sessions and provided with additional information and training resources on MS.

In 2024-25, WGHG direct to market procurement tendering activities required suppliers to complete the HSV MS risk assessment questionnaire as a condition of the tender. Awarded suppliers scored overall MS risk ratings of 1 Moderate, 3 Low and 1 Very Low.

## **Assessing Effectiveness**

Effectiveness is measured through year-on-year analysis of trends and insights gained from supplier assessment of risk ratings. Results from the survey demonstrate that ongoing improvements have been made with ethical sourcing activities of suppliers and their MS maturity levels since baseline data was collected five years ago. WGHG continues to support HSV in MS actions taken and working with suppliers to check how their own modern slavery actions are progressing.

In the next reporting period (2025-26) WGHG will focus on:

- Monitoring key changes in the WGHG direct supplier risk assessments and ratings. This includes requesting new prospective suppliers to complete the MS risk assessment questionnaire as part of the conditions of responding to tendering activities.
- Working with HSV to build further maturity in the MS supplier risk assessments by seeking to combine HSV suppliers and direct WGHG suppliers into one risk assessment report.
- Ensuring WGHG direct suppliers are invited to attend HSV supply engagement sessions and MS education sessions.
- Our key procurement staff continue to attend and participate in the HSV Community of Learning sessions.
- Continuing to actively work with HSV to better understand the 16 high/very high-risk level suppliers used in our supply chain and actions that can be taken to reduce any perceived modern slavery risks;
- Continuing to develop and maintain a modern slavery risk register of suppliers rated under both HSV-led and WGHG-sourced procurement activities, including information on annual spend and trends in risk ratings and current insights.
- Providing ongoing education and training for the Executive and Procurement and Supply Chain teams via the HSV online modern slavery training module.

## Consultation Process

WGHG does not own or control other entities but collaborates with regional partners through the Gippsland Health Alliance and Gippsland Local Health Network. Regular procurement governance committees, supported by HSV, support maturity in procurement and modern slavery practice and compliance.

## Closing Statement

WGHG remains committed to continuous improvement in identifying and addressing modern slavery risks, leveraging partnerships and data to enhance supply chain transparency and accountability.

The strengthened partnering model under the newly established Gippsland Local Health Networks (LHN)s from July 2025, may present further opportunities for WGHG and network members to leverage and share key resources and data to drive further MS analytic capabilities and MS supplier risk ratings across Gippsland.

## Statement of Annexure

This statement was approved by the Board of Directors on 26 February 2026.



Jo-Anne Moorfoot  
Board Chair, West Gippsland Healthcare Group