

Grampians Health Modern Slavery Statement 2024/2025

Acknowledgement of Traditional Owners

Grampians Health pays its respects to all of the Traditional Custodians of the countries that our health service operates on and their connections to land, waterways and community.

We acknowledge our deep respect to their Elders past present and extend that respect to Aboriginal and Torres Strait Islander peoples today.

Grampians Health recognises and values the contributions that Aboriginal and Torres Strait Islander peoples make in our society.

Sovereignty has never been ceded. It always was and always will be, Aboriginal land.

Introduction

This Modern Slavery Statement is made pursuant to the Commonwealth Modern Slavery Act 2018 (i.e. *the Act*) by Grampians Health and relates to the financial year 1 July 2024 to 30 June 2025.

In making this statement, Grampians Health recognises that modern slavery practices are major violations of human rights and serious crimes, where coercion, threats, or deception are used to exploit victims and undermine or deprive them of their freedom and must be stamped out in all its various forms. Grampians Health commits to its ongoing responsibility to use its best endeavours to identify and take action against modern slavery risks to maintain a responsible and transparent supply chain.

About Grampians Health

Grampians Health is dedicated to delivering comprehensive and accessible healthcare solutions to our diverse population.

Committed to the wellbeing of individuals, families, and communities, Grampians Health prioritises effective prevention and health promotion strategies. Through a collaborative approach, we aim to strengthen the capacity of the communities we serve, ensuring equitable access to high-quality care, closer to home.

With a focus on innovation and compassion, Grampians Health strives to be at the forefront of healthcare excellence, fostering a healthier and thriving Grampians region. Serving a population of over 250,000 residents across 48,500km squared, Grampians Health understands the need for continuous care growth and improvement, and is committed to addressing life expectancy disparities, reducing cancer-related premature mortality rates, and tackling the rising rates of poor mental health. Grampians Health also strives to address alcohol-related harm, obesity, and First Nations health disparities.

Grampians Health is dedicated to delivering a wide range of services, spanning from pregnancy and birth to palliative care and organ donation.

Innovative care is at the core of Grampians Health's approach. Using a mix of mobile and remote services, staffing at partner facilities, and robust collaborations with health services across the entire Grampians region, Grampians Health values and invests in a skilled workforce, providing ongoing training and development opportunities.

Reporting Criterion 1 and 2:

Structure, operations, and supply chains

Grampians Health (ABN: 39 089 584 391) is a health service established under section 181 of the *Health Services Act 1988 (Vic)*.

Grampians Health operates as a primary healthcare provider in the Grampians region, with five main campuses located in Ballarat, Dimboola, Edenhope, Horsham and Stawell, alongside several satellite sites.

The health service employs over 7,500 staff from 40 countries and maintains a diverse workforce.

Goods and services are procured either directly from suppliers or through collective agreements mandated by HealthShare Victoria (HSV), an independent public sector provider responsible for supply chain, procurement, and corporate services across Victoria's public health services.

Currently, Grampians Health has more than 3,000 active suppliers, including 173 key suppliers contracted under HSV agreements. The top 100 suppliers account for 80% of non-salary expenditure, highlighting HSV's substantial role in the supply chain.

Major categories of goods and services procured directly by Grampians Health include:

- Outsourced non-clinical support services;
- Telecommunications;
- Information technology hardware, software, and services;
- Professional services;
- Furniture, fittings, and equipment;
- Facilities maintenance;
- Financial investments through Victorian Funds Management Corp. (VFMC);
- Specialised clinical products; and
- Construction works and services.

Procurement of construction-related works and services follows the *Ministerial Directions and Instructions for Public Construction Procurement in Victoria (1 July 2018)* as outlined in the *Project Development and Construction Management Act 1994*. Suppliers are selected from the Construction Supplier Register (CSR), a pre-qualification scheme managed by the Department of Treasury and Finance (DTF) for construction projects within the Victorian Government.

HSV functions as a state-wide procurement organisation, partnering with Victorian public health services to procure goods and services. HSV facilitates large-scale tenders and manages common-use contracts on behalf of the State. Grampians Health and other public health services in Victoria rely on HSV's processes and policies to identify and address modern slavery risks in their supply chains. For further information on HSV's role in managing modern slavery risks, refer to the [Health Share Victoria website](#).

Reporting Criterion 3:

Risks of modern slavery practices in the operations and supply chains of Grampians Health

Grampians Health has a large multi-layered supply chain that includes the purchase of goods and services required for the delivery of hospital operations. The supply chain is made up of approximately 2,800 suppliers across a diverse range of industries, each supported by a multi-level supply chain.

Our suppliers, as well as those within our broader supply chain, are predominantly based in Australia. Additionally, we engage with suppliers located in Canada, China, Costa Rica, the Czech Republic, the Dominican Republic, France, India, Ireland, Japan, Malaysia, Mexico, Pakistan, Poland, Slovakia, Sri Lanka, Sweden, Switzerland, Taiwan, Thailand, Tunisia, the United Kingdom, and the United States.

Many of these countries have publicised records of modern slavery, particularly in those countries where the rule of law is challenged and use of low cost, migrant labour reflects standard operating practices. There is evidence that indicates the occurrences of modern slavery in the sourcing of raw materials used in the production of health care goods, including gloves, surgical instruments, patient clothing, uniforms and footwear, sheets, towels and other textiles, and electronic health care equipment often involves hazardous working conditions, labour exploitation, child labour and other abuses, resulting in a high-risk that Australian health services are exposed to modern slavery risks.

Grampians Health, as a responsible organisation, acknowledges the existence of modern slavery risks within supply chains, particularly those operating offshore and in high-risk geographies. However, to the best of our knowledge there is no evidence to suggest that Grampians Health has directly caused or contributed to modern slavery practices

With the growing complexity and globalisation of supply chains, Grampians Health is embarking on a focused strategy for the 2025/2026 period. Grampians Health will undertake a comprehensive assessment of procurement activities with all organisations from which it directly procures goods and services.

Assessment methodology

In assessing suppliers, a modern slavery risk assessment tool comprising of macro and micro assessment components was utilised. The micro assessment identified modern slavery risks across four categories.

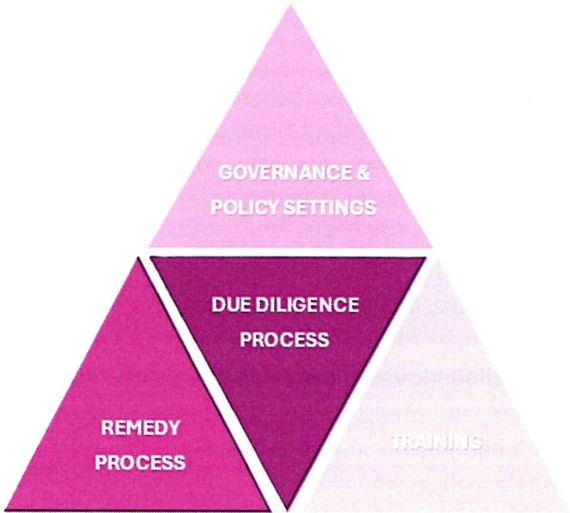
Figure 1. Modern Slavery Micro Assessment Tool



This involved considering whether there is a high prevalence of modern slavery in a particular sector or industry, or associated with particular goods or services, or in the geographic location that the product or

service is sourced or produced from. The micro assessment also considered whether the nature of the supply chain model carried a greater risk of modern slavery. This type of assessment provided a general understanding of the scope of modern slavery risks that suppliers may carry.

Figure 2. Modern Slavery Macro Assessment Tool

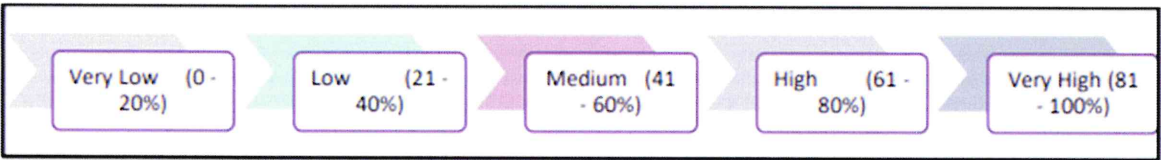


The macro assessment facilitated a detailed analysis by identifying and assessing possible modern slavery risk and in determining what risk mitigation strategies suppliers already had in place and what risks would need to be managed. Furthermore, the macro assessment involved risk identification across four categories: policy, due diligence, remedy and training.

Macro assessment involved risk identification across four categories:

- Policy;
- Due diligence;
- Remedy; and
- Training.

Figure 3. Risk Ratings



Modern Slavery was weighted at 80 per cent as this section was to allow the supplier to highlight what policy, procedures, due diligence/visibility, remedy, and training/awareness were in place and to offset the company details section. In these sections, scoring was assigned to each question with some yielding higher scores based on the importance of the topic. This accumulation of the score would equal their weighting for the various section/s, etc., to score high on a target would result in a high to very high result in modern slavery.

The totals of both the macro and micro components included assigned weighting, rating, and risk scales, designed to allocate a modern slavery risk rating to suppliers. Suppliers were allocated one of the following

risk ratings: very low, low, medium, high, or very high. From the rating, monitoring and support can occur to facilitate less and less opportunity that modern slavery occurs.

For those suppliers with HSV agreements, the tool was operationalised in the form of a Modern Slavery Supplier Questionnaire on the Informed 365 platform, being HSV's supply chain management platform. The questionnaire was rolled out to 173 suppliers in September 2024 with a completion request date of November 2024 to coincide with the conclusion of the reporting period under *the Act*.

Modern slavery supplier risk assessment

HSV Collective Agreements

Grampians Health procures approximately 80% of goods and services (i.e. non-salary expenditure) through HSV collective agreements. Given this quantum, in 2024/2025 Grampians Health collaborated with HSV, placing additional effort within this supplier cohort to undertake supplier risk assessments.

In total, supplier risk assessments for 173 suppliers were undertaken in 2024/2025. Of the 173 suppliers invited to participate in supplier risk assessments: 128 responded (75%); 3 declined (1%); and 42 did not respond (24%).

Figure 4. 2024/2025 Supplier Risk Assessment Responses

Risk Category	No. Suppliers
Very High	-
High	16
Medium	94
Low	18
Very Low	-
Total	128

These results illustrate a significant improvement from supplier risk assessments completed in the prior year.

Figure 5. 2023/2024 Supplier Risk Assessment Responses

Risk Category	No. Suppliers
Very High	3
High	18
Medium	62
Low	39
Very Low	-
Total	122

Of significance, the macro assessment of responses received in 2024/2025 indicated that:

- 120 respondents have a policy in place regarding Modern Slavery.
From these respondents:
 - 95 respondents communicate their policy to staff; and
 - 103 respondents monitor compliance to their policy.
- 109 respondents have a role that is responsible for identifying and overseeing modern slavery risks in relation to the goods/services they provide.
- 107 respondents have mapped their supply chain on multiple layers and levels to confirm high transparency over operations.
- 104 respondents have a system or process in place to screen prospective suppliers.
- 97 respondents conduct risk assessments inclusive of modern slavery.
- 69 respondents conduct audits that it includes modern slavery.
- 107 respondents train their staff to identify, assess and respond to modern slavery risk;
- 113 respondents have remediation / action plans in place to respond to modern slavery issues.

Additionally, Grampians Health has requested assistance from HSV to provide mitigation strategies for the 16 identified high risk and 94 medium risk suppliers. This work will form part of Grampians Health's 2025/2026 modern slavery review and action plan, whereby Grampians Health commits to further collaboration with HSV, and high / medium risk suppliers, to further understand and mitigate modern slavery risk.

Finally, Grampians Health and HSV are working with all suppliers who have not responded, or declined to respond, to assess what this means for the future supply of goods and services, tender responses and contractual obligations.

Reporting criterion 4:

Actions taken to assess and address these risks, including due diligence, remediation processes and contracts

The following actions were undertaken by Grampians Health during the 2024/2025 reporting period to address modern slavery risks in supply chains:

1. Grampians Health conducted further analysis of Grampians Health spend of clinical consumables outside of the consumables procured from HSV collective agreements. This work has seen Grampians Health increase purchasing from the HSV collective agreements;
2. Commenced a review of non HSV suppliers applying the Pareto Principle;
3. Grampians Health continued to take part in the monthly modern slavery training provided by HSV;
4. Grampians Health has provided guidance and training to all staff involved in tenders and contract negotiations in assessing modern slavery requirements;
5. In December 2024, the Grampians Health submitted its third Modern Slavery Statement;
6. Worked with HSV to have letters issued to all very high, high and medium-risk suppliers, which provided them with links to resources and free online modern slavery risk training. HSV also provided supplier engagement sessions to both HSV and non-HSV suppliers over the course of last year to assist with increasing awareness of modern slavery risks and lifting the capabilities within suppliers on modern slavery risk management;
7. Continue evaluating and undertake risk assessments of Grampians Health specific suppliers; and
8. As part of an internal audit program, Grampians Health policies and procedures were reviewed, which included the effectiveness of our documentation relating to the management of Modern Slavery risks. There were no adverse findings from the audit.

Actions to be taken by Grampians Health in 2025/2026

1. During FY2025/26 HSV will conduct a risk assessment of all non-HSV suppliers on behalf of Grampians Health. This is in addition to conducting the same assessment for HSV contracted suppliers. A planned report will detail the outcome of the assessment and will be issued to Grampians Health in conjunction with the assessment of their suppliers;
2. The focus of our fourth reporting period of 2025/26 will be to continue to work collaboratively with HSV to identify mitigation efforts to combat modern slavery risks, and foster collaboration between Grampians Health and suppliers to seek to address these risks;
3. Grampians Health will join and participated in the HSV Risk Mitigation Program. This group has been formed to allow HSV to seek the view of health services to support reporting for criteria 3 and 4. This is intended for health services to use a risk assessment questionnaire as a single-sector approach;
4. We will be continuing to review and update our existing contracts to ensure they have appropriate modern slavery clauses. We will ensure all contract templates include an updated modern slavery clause and with each contract renewal, we will include this clause;

5. Grampians Health will continue reviewing of non HSV suppliers, applying the Pareto Principle (i.e. the 80/20 rule) to Grampians Health spend profile. Suppliers will be risk rated in regard to compliance with *the Act*, i.e. having a modern slavery statement including compliance to the four macro categories; and
6. The HSV modern slavery e-learning module to be updated into the Grampians Health Learning Hub, a new portal that went live in June 2024. Training will be provided to all relevant staff in 2025/2026, some of which will include purchasing and procurement and executive staff.

Training

HSV continues to facilitate learning programs and training for key health service stakeholders on modern slavery practices and the requirements of *the Act*. These workshops, attended by Grampians Health procurement lead, provided guidance on how to address the seven mandatory reporting criteria under *the Act*.

Reporting criterion 5:

How Grampians Health assesses the effectiveness of actions taken to assess and address modern slavery risks

Grampians Health will continue to work in partnership with HSV to understand and fulfil its modern slavery obligations, which should assist in reducing modern slavery risks within Grampians Health Service's supply chain. Part of this approach is to participate in the HSV Risk Mitigation Program, working with the consultation group to provide suppliers with a single-sector approach.

Recognising their significant role in preventing modern slavery in health service supply chains and the benefits of its actions to the broader sector, HSV has developed a comprehensive program to support the sector, including:

- A modern slavery toolkit;
- A modern slavery statement guide;
- Supplier engagement template; and
- Modern slavery community of learning program.

With this, in 2024/2025, Grampians Health identified and completed the following actions:

- Implemented and embedded Modern Slavery requirements in existing policies and procedures;
- Provided targeted education and training for the procurement team using education packages from Health Share Victoria; and
- Have a greater understanding of Modern Slavery and associated risks.

Grampians Health ensures that all key personnel have undertaken all necessary training, continue to be involved in the ongoing modern slavery health sector community, and immediately actions all HSV updates. In addition, the effectiveness of actions can also be measured through the ratings of the suppliers. This is a continuous process, with both Grampians Health and HSV working in conjunction to reduce exposure in the supply chain.

Reporting Criterion 6:

Grampians Health consultation process with related entities it owns or controls

Grampians Health does not own or have any controlling interest in any other entities.

Reporting Criterion 7:

Other relevant information

Grampians Health is strongly committed to advancing human rights and has embedded *the Charter of Human Rights and Responsibilities Act 2006(Vic)* into its values and policy which include for example:

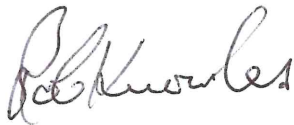
- Gender Equality;
- Social Procurement;
- Rights of Indigenous People;
- Rights of LGBTIQ+ Persons;
- Freedom of Religion and Beliefs;
- Good Governance; and
- People with Disabilities.

Closing statement

Grampians Health is confident that the steps taken this year have continued to build a strong foundation for a robust modern slavery framework. Grampians Health recognises there is more to do and is committed to continually improving its approach, collaborating with our stakeholders to identify and eradicate modern slavery in our supply chains.

Grampians Health Board is pleased to see HealthShare Victoria taking a leading role in assessing and managing the sector wide risks of modern slavery. We look forward to seeing this central leadership role grow further, with the support of the Victorian Public Health Service.

This modern slavery was approved by the Board of Directors of Grampians Health on 29 October 2025.

A handwritten signature in black ink, appearing to read 'Rob Knowles', is positioned above the printed name and title.

Hon. Rob Knowles AO
Board Chair
Grampians Health

