

Modern Slavery Act Statement

Financial Year 23-24

Introduction

As one of Victoria's leading healthcare institutions, Austin Health understands that we play a key role in combating modern slavery.

A core Austin Health value is that through our actions, we show we care. We are committed to increasing awareness of the risks of slavery, human trafficking and other exploitative activities and taking positive action to eradicate this practice from local and global supply chains.

This Modern Slavery Act Statement is made pursuant to the Commonwealth Modern Slavery Act 2018 (the Act) by Austin Health and relates to the financial year 1 July 2023 to 30 June 2024.

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About us, overview of our operations and supply chains

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About Us

Austin Health (ABN 96 237 388 063) is a health service established under section 181 of the Health Services Act 1988 (Vic).

Austin Health serves Melbourne's north-east, providing high levels of care to meet the rapidly changing needs of people in one of Melbourne's fastest growing regions. Serving a population of over 350,000 people, our hospitals include Austin Hospital (incorporating the Olivia Newton-John Cancer Wellness & Research Centre), Heidelberg Repatriation Hospital, and Royal Talbot Rehabilitation Centre.

The right care in the right places

Austin Health provides a range of health services throughout the communities we serve. These services include the specialists at the Health and Rehabilitation Centre, a range of Health Independence programs, a robust and effective mental health service, and an innovative Hospital in the Home service.

An array of specialist care services

We offer specialist care for specialist needs including emergency medicine, cancer, infectious diseases, obesity, liver transplant, spinal cord injury, acquired brain injury, intensive care medicine, cardiac care, neurology, endocrinology, mental health, respiratory, toxicology, child mental health and rehabilitation.

Internationally recognised clinical teaching and training

Austin Health is recognised around the world for our high standards of teaching, professional education and training. We foster the next generation of care providers through affiliations with 16 universities and four TAFEs. We are also the largest training provider for specialist physicians and surgeons in Victoria.

An extraordinary record of research successes

Our centre of excellence for hospital-based research brings together more than 1,000 world-leading researchers and leading research institutes. Austin Mercy Precinct Research Collaborative Committee has a strong focus on responsive, collaborative research in partnership with:

- University of Melbourne departments of Medicine, Surgery, Psychiatry, and Physiotherapy
- Florey Institute of Neuroscience and Mental Health
- Olivia Newton-John Cancer Research Institute (ONJCRI)
- Institute for Breathing and Sleep (IBAS)
- Parent-Infant Research Institute (PIRI)



- Spinal Research Institute
- Mercy Hospital for Women
- Austin Medical Research Foundation (AMRF).

The multidisciplinary alliance comprises world-class scientific leaders who conduct research into cancer, neurosciences, transplantation including xenotransplantation, heart disease and hypertension, immunology, infectious diseases and microbiology, endocrinology, sleep disorders, palliative care and spinal cord injury.

Responding to the care needs of all Victorians

We provide statewide services to residents across Victoria. These include:

- Acquired Brain Injury (ABI) Rehabilitation Unit
- Austin Toxicology Service
- Victorian Liver Transplant Unit (VLTU)
- Victorian Poisons Information Centre (VPIC)
- Victorian Respiratory Support Service (VRSS)
- Victorian Spinal Cord Service (VSCS).

Centres of Care

Austin Hospital

Austin Hospital cares for the current and future needs of the people living in the north-east of metropolitan Melbourne and Victoria.

The hospital has 24 wards accommodating medical, surgical and speciality services and more than 550 beds including a 29-bed intensive care unit and a 78-bed precinct for the care of patients with mental health disorders. This also includes a substantial 24-cubicle Emergency Department with a dedicated six-bed children's area, as well as 24 short stay beds for adults, children, and mental health clients. There are also 11 operating theatres providing agile, responsive emergency surgery that are available for selected elective surgery and procedures.

The hospital is home to many unique teaching, training, and research facilities.

Olivia Newton-John Cancer and Wellness Centre

A part of Austin Hospital, the Olivia Newton-John Cancer Wellness & Research Centre (ONJ Centre) is a leading cancer research and treatment hospital. The ONJ Centre provides world-leading treatment, evidence-based wellness programs and supportive care that nurture the physical, psychological and emotional wellbeing of patients, carers, and families.

With more than 200 clinical trials undertaken every year, the centre is a world leader in cancer medicine. Our recent successes include new advances in immunotherapy, targeted therapy, and personalised medicine diagnostics.

In line with contemporary best practice, researchers and clinicians work together with laboratories located adjacent to where patients are cared for and receive treatment. This co-location of treatment and research facilities enables the rapid translation of scientific discovery into clinical trials and treatments, fostering the discovery and development of better therapies to improve health outcomes.

Heidelberg Repatriation Hospital

The Heidelberg Repatriation Hospital has evolved from a returned services hospital to a thriving care centre for a growing community. Offering 152 beds, the hospital provides responsive and proactive care to the community, including:

- Surgery - eight operating theatres, serviced by specialists across multidisciplinary teams.
- Mental health - our mental health precinct houses the state-wide Psychological Trauma Recovery Service, Community Recovery Program and Transition Support Unit



- Aged Care - aged care community programs including assessment and management services for older people moving into Residential Aged Care, and support for returning home after receiving inpatient care
- Outpatient Rehabilitation services - our Health and Rehabilitation Centre provides rehabilitation services, programs and clinics, including the Kokoda Gym, hydrotherapy pool and consulting rooms.
- Leading community care – supporting the community through the Northern Centre Against Sexual Assault (NCASA).

Royal Talbot Rehabilitation Centre

Royal Talbot Rehabilitation Centre is a 77-bed facility offering specialist care and intensive rehabilitation.

The centre provides leading multi-disciplinary rehabilitation services for patients following amputation, stroke, spinal injury, surgery and other illnesses and injuries.

The site also provides a range of mental health services. These incorporate a Brain Disorders Program, including a Community Brain Disorders Assessment and Treatment Service, a 33-bed specialist ward and a behaviour consultancy service for people with acquired brain injuries.

A range of creative therapies including art, music and garden therapy further aid recovery and treatment.

Partnerships

Taking radiation oncology services to regional residents

In partnership with two regional health services Austin Health operates the Ballarat Austin Radiation Oncology Centre and the Stawell Austin Radiation Oncology Service.

By providing regional residents with easy local access to radiation treatment, they don't have to travel to Melbourne. This dramatically shortens the time required for treatment and ensures patients are closer to home to start post-treatment recovery sooner.

North Eastern Public Health Unit

During 2023-24, Austin Health led the North Eastern Public Health Unit (NEPHU) through significant achievements. NEPHU serves the north eastern region of Melbourne, with a population of 1.81 million people (28 per cent of the Victorian population), one of the most diverse populations in Australia.

This year activity expanded beyond the initial scope of COVID-19 and NEPHU now manages 82 notifiable communicable diseases. In 2023-24 NEPHU managed over 6,400 notifications spanning a wide range of diseases. NEPHU supported aged care and other settings managing over 940 outbreaks of COVID-19, influenza, respiratory syncytial virus and gastroenteritis. Further support was provided to over 180 facilities via online forums, regular communications, site visits and direct support from our Infection Prevention and Control team.

The Population Health team finalised the inaugural population health catchment plan and began its implementation. The two-year plan (2023-2025) includes two priority health areas (healthy eating, and sexual and reproductive health) for the region. This includes 19 targeted initiatives in the community and across the sector that have begun or will commence roll-out in 2024-2025.

The Engagement and Communications teams continued to collaborate with community partners to increase awareness and knowledge of various health conditions, promote protective factors, amplify urgent messaging, and empower self-management for the whole population. This work has included over 20 targeted health campaigns, with specific attention given to priority and multicultural populations.

Our Guiding Principles



Our Guiding Principles represent what we stand for. They are the foundation for all we do, providing universal and enduring guidance to our day-to-day behaviours and decision-making. We will test our ideas and decisions against these principles to ensure we stay true to what is important to us, our patients, community, people and the broader service system.

Timely access to high quality care

We provide high-quality care to our patients in the right place at the right time. We commit to remove barriers to accessing care and promote equity and consistency in our practices. We remain flexible in our care, using innovative and evidence-based practices to deliver appropriate care to our patients.

A great place to learn, work and grow

We are proud to be a major teaching and training health service that invests in developing our people to be the best they can be. We embrace our people’s diversity and commit to strengthening our inclusive culture. We support the career development of clinical and non-clinical staff, who all play a vital role in our organisation.

Research activities that improve patient outcomes

Our research is highly relevant to our patients. Our research is recognised and helps us cultivate a culture of improvement in delivering care. We strive to harness our research and academic partnerships to convert discovery and innovation into improved health outcomes.

Listen to what our patients and community say

We know and appreciate that when it comes to caring for our patients, their needs are different and unique. Our patients require care that is personalised and involves them in decision-making. We put our patients and community at the centre of everything we do. Members of our diverse community will experience inclusive services.

Culturally safe services for Aboriginal and/or Torres Strait Islander Peoples

We acknowledge and respect the diverse and distinct cultures of Aboriginal and/or Torres Strait Islander Peoples and are committed to providing a culturally safe environment for patients, families, and staff.

Technology and infrastructure support patient care

We evolve with new technologies and tools to support contemporary and holistic care. We strive to ensure our physical spaces are fit for purpose, modern and safe for our people to help progressive patient care. We commit to take a leading role in setting the standard for the environmental and social agenda of the broader Victorian health system.

Our purpose

“Helping people live healthy, productive and fulfilled lives”

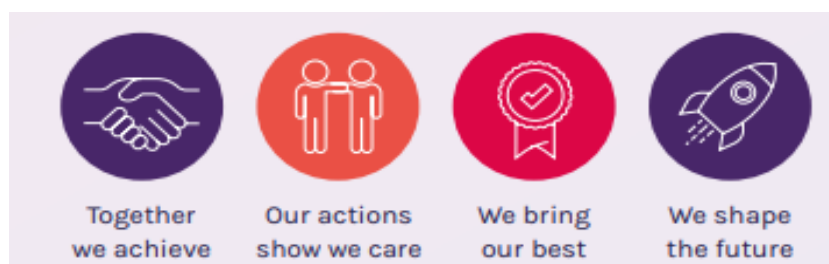
Our vision

“Shaping the future through exceptional care, discovery and learning”

Our Values

Our values reflect what we want to be known for. They shape our culture and the behaviours, practices, and mindsets of our people. Our values will help us achieve what we set to do over the next five years.

Figure 1 – Austin Health values



Our workforce

As of 30 June 2024, we had 7285 Full Time Employees (FTE). Nurses make up the largest portion of 40.66% followed by administration/clerical staff 14.89% and medical support services 10.67%.

Annual Report

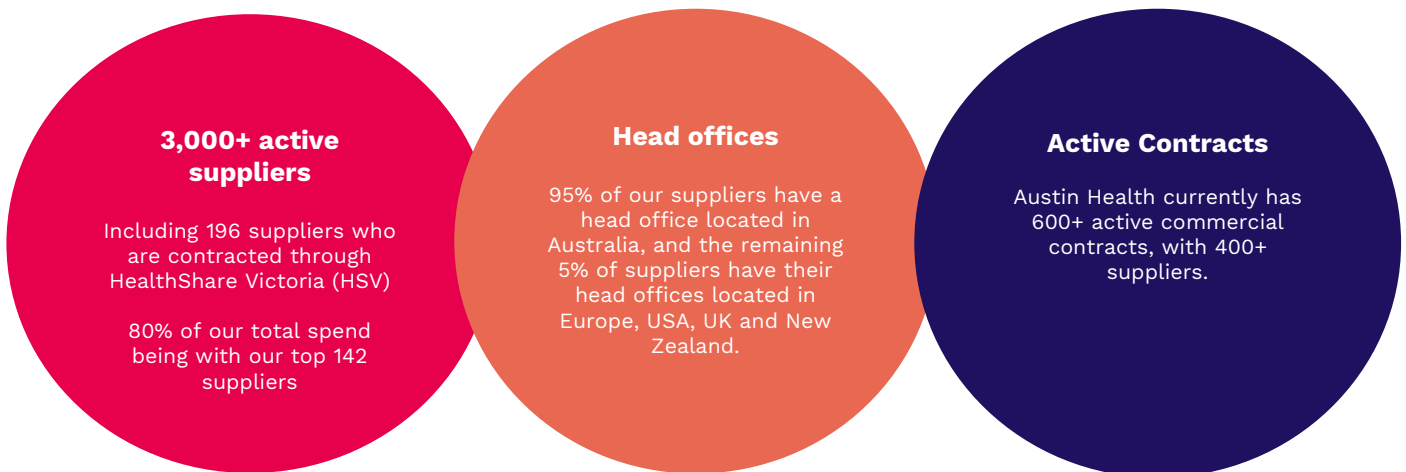
The FY23-24 Austin Health Annual Report is available on the Austin Health website.

Goods & Services

Austin Health is a major metropolitan hospital, providing a range of specialist services both in the hospital, community and patient homes. Austin Health sources a vast range of goods and services.

As a public health agency, Austin Health benefits from state-wide contracts that have been negotiated by Health Share Victoria (HSV). Where such contracts do not exist, the sourcing approach for each purchase is determined by value and risk considerations.

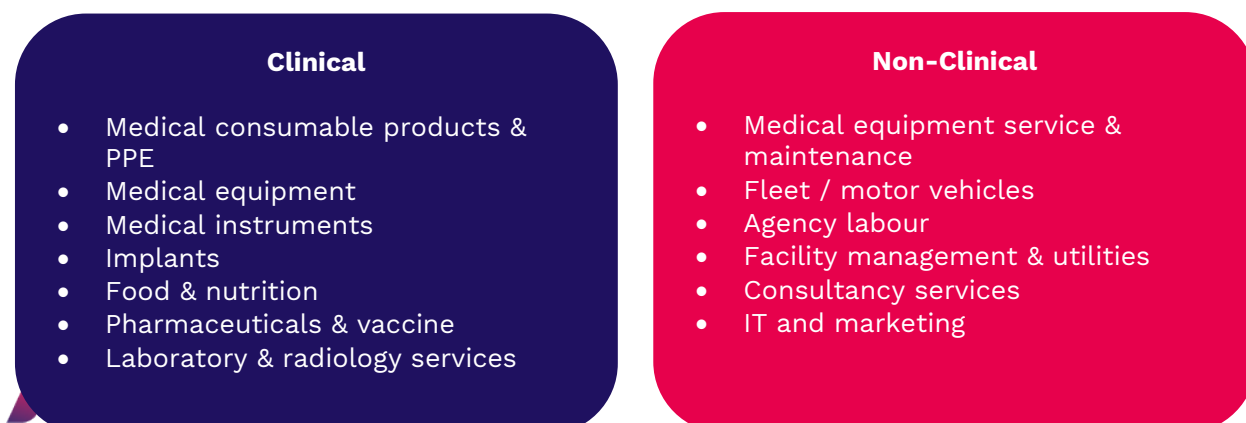
Below showcases the variety and breadth of the supplier and contracts landscape portfolio over FY23-24.



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. Austin Health purchases goods and services from suppliers who are party to HSV collective agreements. As such, it is recognised that HSV have a significant role in health service supply chains.

HSV contracts cover a broad range of services, equipment and supplies. Examples of sourcing categories covered are ventilators, beds, mattresses, patient trolleys, treatment chairs, hypodermic needles and syringes, gloves, pharmaceutical products, IV fluids, agency labour, catering supplies, laundry and linen services and non-emergency patient transport. A full list of HSV's sourcing categories can be found at <https://healthsharevic.org.au/contracts-and-tenders/contracts-and-documents>.

During FY23-24, Austin Health purchased a wide array of goods and services:



Our Supply Chain

Austin Health recognises the extensive nature of our global supply chains may expose us to modern slavery risks. Below are numbers of Austin Health suppliers operating in high to very-high risk countries and industries:

Risk Level*	Country	Supplier Count.
High	China	25
Risk Level**	Industries	Supplier Count.
Very high	Health Care Distributors	23
	Distributors	11
High	Health Care Supplies	55
	Health Care Equipment	46
	Health Care Equipment & Services	43
	Health Care Technology	15
	Health Care Provider & Services	7

- High risk country: Countries where the supply of low-skilled labour to industry have low entry barriers, limited protections for civil liberties and human rights, or are in volatile region, such as India, China, Pakistan, Bangladesh, North Korea, etc.
- Very high risk industries: These industries often involve complex, multi-tiered supply chains with limited oversight. They frequently rely on highly vulnerable workers, such as migrant and seasonal laborers, who have few rights or protections, making them more susceptible to severe exploitation. Examples include: Agriculture and Food Production, Textiles, Constructions and Mining, etc.
- High risk industries: Compared to Very high risk industries, high risk industries are generally better regulated or monitored. These industries may still rely on vulnerable populations but may include a mix of workforce types, including some skilled or semi-skilled roles. examples include healthcare supplies, hospitality, transportation, and food processing.

Given the level of complexity in such extensive supply chains, Austin Health in partnership with HSV will continue to refine our risk assessment methodology to further improve the visibility of high-risk areas within our health supply chains. Additionally, for contracts entered into by other Government entities that Austin Health uses, we are relying on these entities to complete appropriate supplier due diligence.

Please see Criterion 3 for a more detailed analysis.



Risks in our operations and supply chains

Criterion 3

In FY23-24, Austin Health conducted Modern Slavery Risk Assessments using the new tool provided by HSV in November 2023. Austin invited 39 existing Threshold 3: >\$250k suppliers for assessment. Additionally, 45 suppliers from Austin Health tenders in FY23-24 have undergone Modern Slavery Risk Evaluation.

During FY23-24, HSV identified 384 HSV suppliers for all health services. A risk assessment was conducted by HSV on all recognised suppliers with HSV collective agreements to assess any adverse Modern Slavery behaviours or trends in the supply chain.

1) Modern Slavery Risk Assessment (HSV and Austin Health non-tenders)

Methodology

The risk assessment was a questionnaire provided to all identified suppliers. The questionnaire included 26 central questions, with further questions posed in cases where the initial responses provided by the supplier gave an opportunity for further specific insights to be gathered or gleaned from their understanding and approach to modern slavery.

The methodology adopted by Austin and HSV for risk assessment was divided into two sections:

1. Company Details

This was compiled of four sub- categories. This involved considering whether there is a high prevalence of modern slavery in a particular sector or industry, or associated with a particular good or service, or in the location that the product or service is sourced or produced from. The 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.

Company Details were used to identify:

- the supplier's operational location/s;
- industry/ies they work in; and
- gauge visibility of who they supply to more broadly

2. Modern Slavery

Questions which specifically focus on the supplier's compliance with the four sub-sections covered in the Act: Policy, Due Diligence, Training, and Remediation.

The Modern Slavery section included:

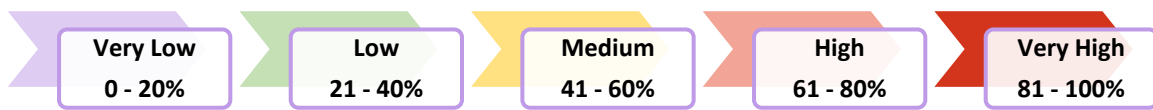


- Requested information on Modern Slavery what policies are in place and if they are communicated to staff and into supply chains.
- Due diligence covered what actions were being taken to mitigate risk and what visibility the supplier had over their operations they oversee.
- Training revolved around what positions within the supplier were being trained on modern slavery and how they spread awareness of the issue within their organisation.
- Remediation requested information around processes in place when identified modern slavery acts/incidents occur and if any current allegations are being investigated against that supplier.

Scoring

Scoring was allocated to suppliers based upon company details accounting for twenty percent (20%) and Modern Slavery weighted at eighty percent (80%) of the Overall Risk rating.

After combining the scoring of both sections, suppliers are allocated one of the following risk ratings: Very Low, Low, Medium, High, or Very high.



Operationalisation

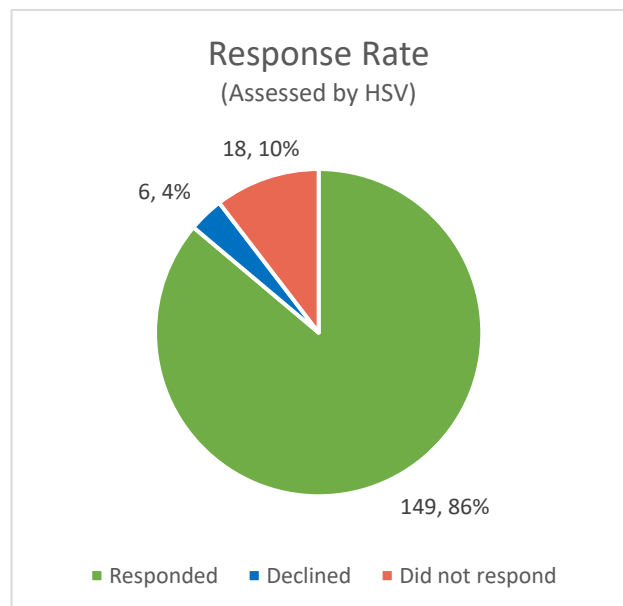
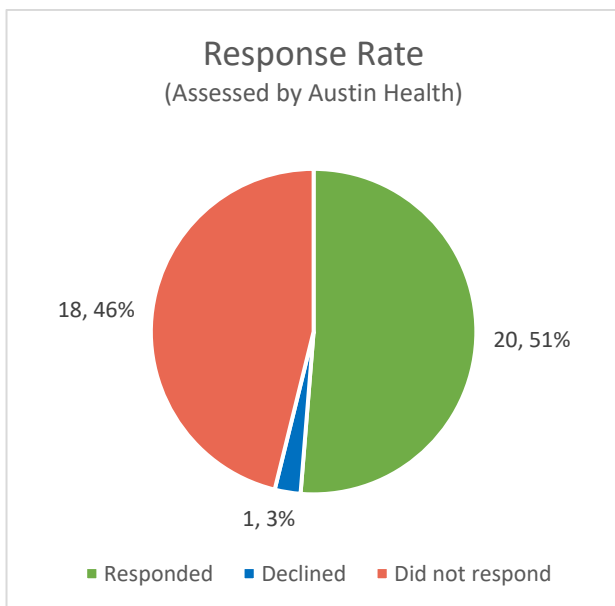
The assessment conducted by Austin Health was rolled out via email to 39 suppliers on 13th March 2024, with a completion request date of 16th April 2024. HSV requested 196 Austin suppliers to complete a risk assessment.

Highlights of The Modern Slavery Risk Assessment - conducted by Austin Health and HSV, pertaining to Austin suppliers for FY 2023-2024:

Response Rate

Austin Health: Of the 39 invited suppliers, 20 responded, 1 declined and 18 did not respond.

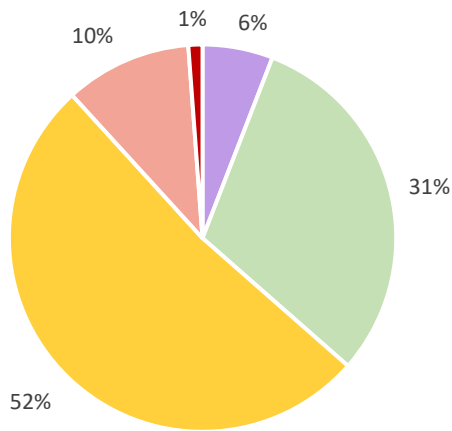
HSV: Of the 196 invited Austin Health suppliers, 149 responded, 6 declined and 41 did not respond.



Supplier Overall Risk Ratings

The below diagrams illustrate the all-inclusive, combined Austin and HSV risk assessment outcomes.

Overall Risk Ratings



■ Very Low ■ Low ■ Medium ■ High ■ Very High

Supplier Overall Risk Categories

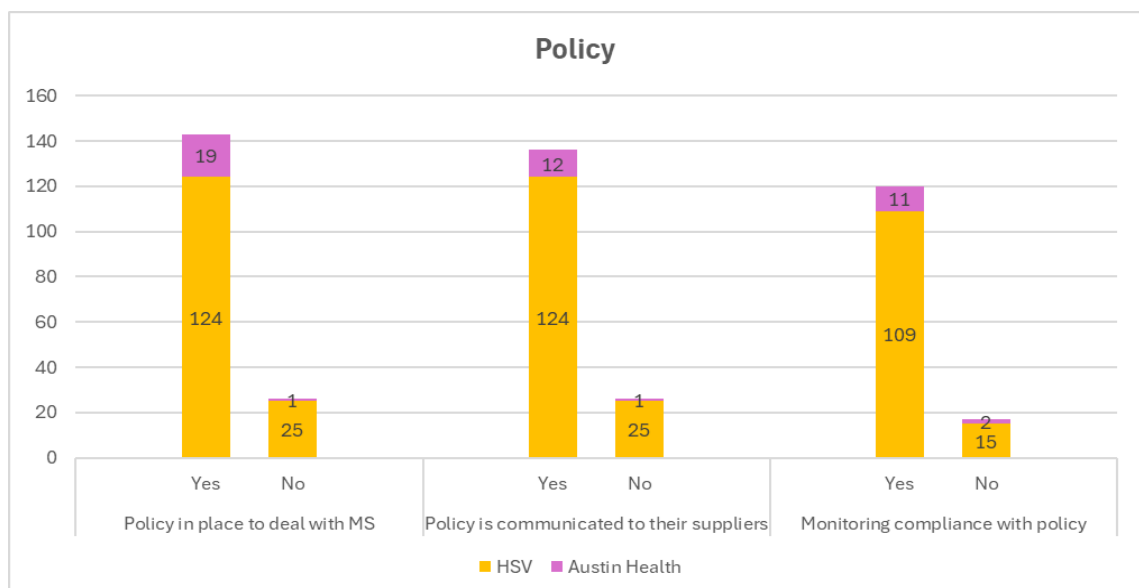
Risk Category	Austin Health	HSV*	Total
Very High	0	2	2
High	1	17	18
Medium	3	85	88
Low	9	43	52
Very Low	7	2	9
Total	20	149	169

**Note: responsibility for remediation of HSV shared contract suppliers sits with HSV. Austin Health is informed which suppliers score High or Very High but is not provided with why they were given that rating. Austin Health is responsible for remediation for non-HSV shared suppliers.*

Policy

The tables below provide a detailed overview of whether suppliers have established policies to address and mitigate modern slavery practices within their operations.

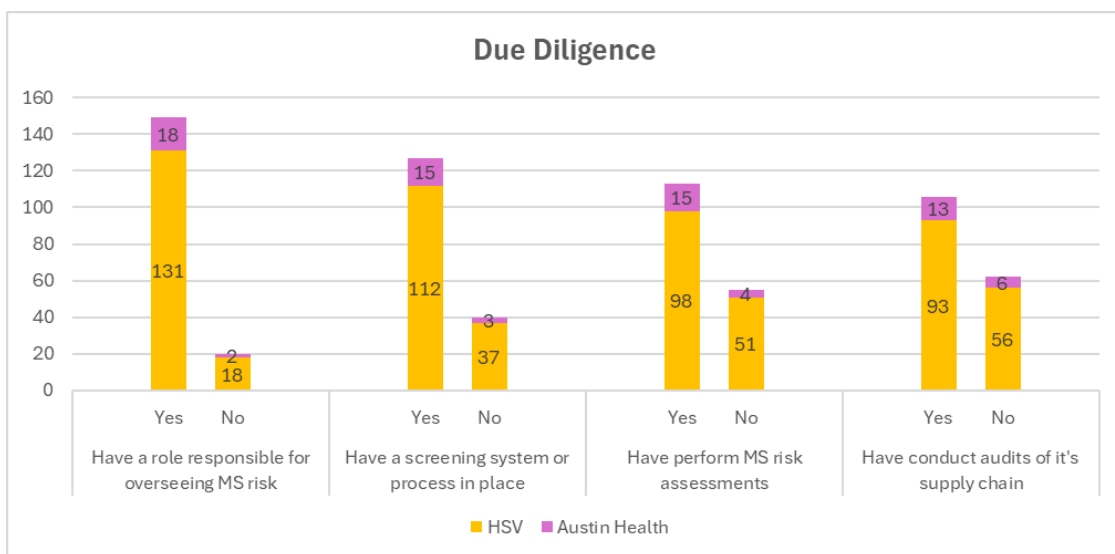
- Policy in place to deal with Modern Slavery
Implementing a modern slavery policy can raise awareness of modern slavery risk within its organisation.
- Policy is communicated to their own suppliers
Suppliers who communicated their policy to their suppliers further reduced their risk rating through encouraging increased awareness of modern slavery risk into the supplier's supply chain.
- Monitoring compliance with policy
Monitoring compliance with a policy shows the supplier is committed to improving their position and risk rating and supports an effective means to reduce risk.



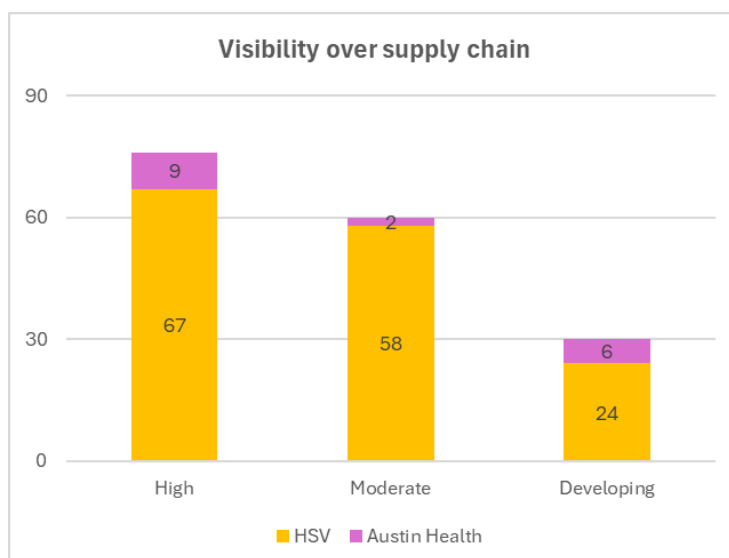
Due Diligence

This section highlights actions that the suppliers take to actively mitigate the risk of modern slavery in their supply chain and operations.

- a) Have a role responsible for overseeing modern slavery risk
The organisation has a dedicated team or team members (including a third party) to oversee modern slavery, representing an important contribution of the organisation's governance framework for managing modern slavery risk.
- b) Have a screening system or process in place
Due diligence actions include pre-screening suppliers before engagement. This ensures potential risks are identified and mitigated early in the procurement process.
- c) Have performed MS risk assessments
Performing risk assessments provides crucial insights into how an organization's suppliers manage modern slavery risks. This process identifying very-high and high risk suppliers, and who may require further engagement.
- d) Have conducted audits of its supply chain
Suppliers conducting audits are elevating the identification of modern slavery risks within their operations and supply chains.



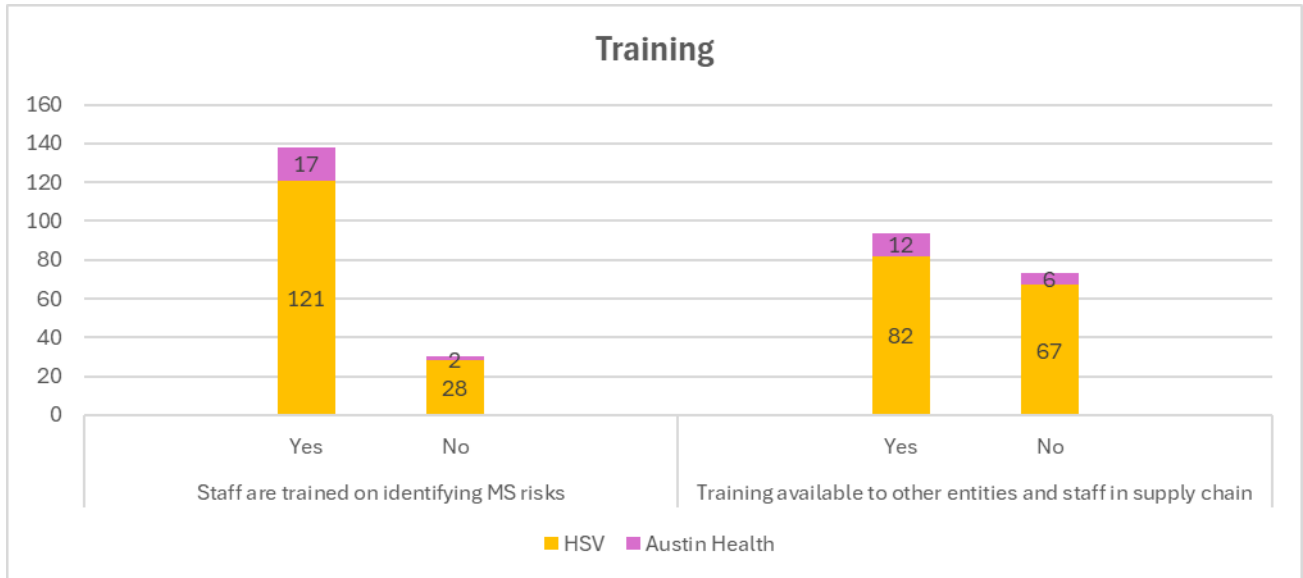
- e) Visibility over the supply chain
Increased visibility over a supply chain means incidents of modern slavery risk are more likely to be uncovered in its lower tiers. Most of Austin's suppliers have identified their key suppliers at various levels of their supply chain



Training

The graphs below show if suppliers have provide training to raises awareness and assist in identification of modern slavery risks within the suppliers' operation and supply chain.

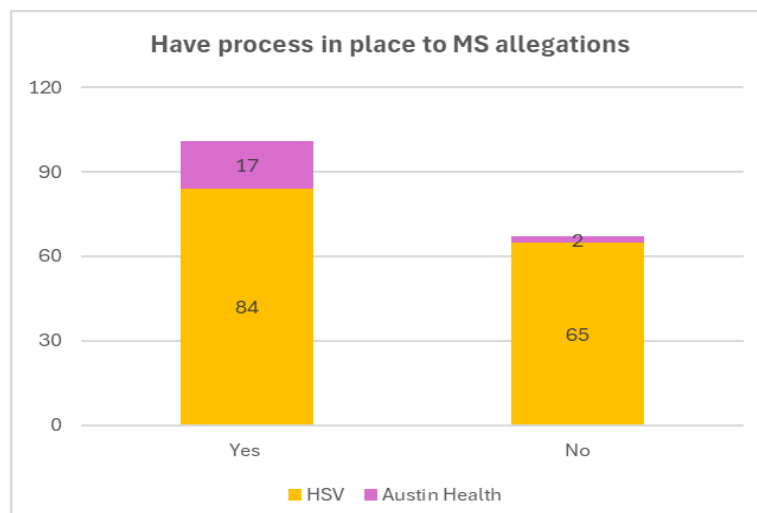
- a) Staff are trained on identifying modern slavery risks
Providing training to staff, particularly those in supply chain management, increases awareness, leading to better management of modern slavery risks.
- b) Training available to other entities and staff in supply chain
Suppliers who are making this training available generally value a broadening of modern slavery awareness within the organisation and are more likely to have made inroads on other modern slavery initiatives such as introducing a policy, and more specific remedial processes, for example.



Remedy

The below table shows suppliers who have remedy/action plans to respond to the allegation of modern slavery.

- a) Have process in place to modern slavery allegations
Remedy action plans enable an organisation, its staff, and suppliers, as well as any affected individuals, to understand how allegations of modern slavery within the supplier organization or its supply chain will be addressed and resolved.



2) Modern Slavery Risk Evaluation (Austin Health tenders)

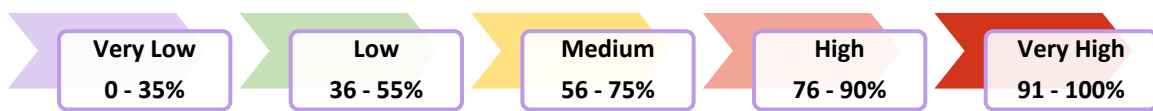
An older Modern Slavery assessment tool was being used for tenders during FY23-24, so is being reported separately. Since FY24-25, the tools have been consolidated. In the FY24-25 Modern Slavery Statement and going forward, the HSV, Austin Health non-tender and Austin Health tender reporting will be consolidated.

Methodology

The Risk Evaluation was developed based on the Long Form Questionnaire provided by HSV in FY19-20. The Questionnaire includes 6 questions requiring suppliers to provide details of how they are/will identify, assess, and address the risk of modern slavery practices in the operation and supply chains, which cover Policy, Due Diligence, Training, and Remedy.

Scoring

Scoring was allocated to suppliers based on suppliers' responses to the Modern Slavery Questionnaire. After evaluating the scoring of suppliers responses, suppliers are allocated one of the following risk ratings: Very low, Low, Medium, High, or Very high.



Operationalisation

The Risk Evaluation requested by Austin was rolled out to a total of 45 suppliers as a criterion during the contract application process for 15 Austin Health tenders that commenced in FY23-24.

Highlights of The Modern Slavery Risk Evaluation report - Austin to tender suppliers for the FY 2023-2024:

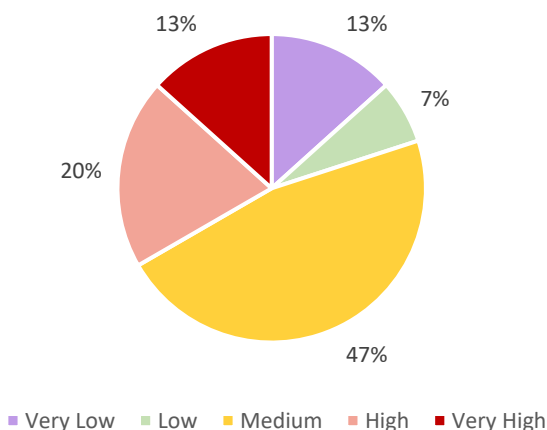
Evaluated Rate

Of the 45 suppliers invited to participate in 15 of Austin's tenders, all completed the Modern Slavery risk evaluation, and 15 were selected as awarded suppliers for contracts commencing in FY23/24.

Supplier Modern Slavery Risk Ratings

The below diagrams illustrate the risk evaluation outcomes.

Modern Slavery Risk Ratings



Supplier Modern Slavery Risk Categories

Risk Category	Austin Health
Very High	2
High	3
Medium	7
Low	1
Very Low	2



Policy

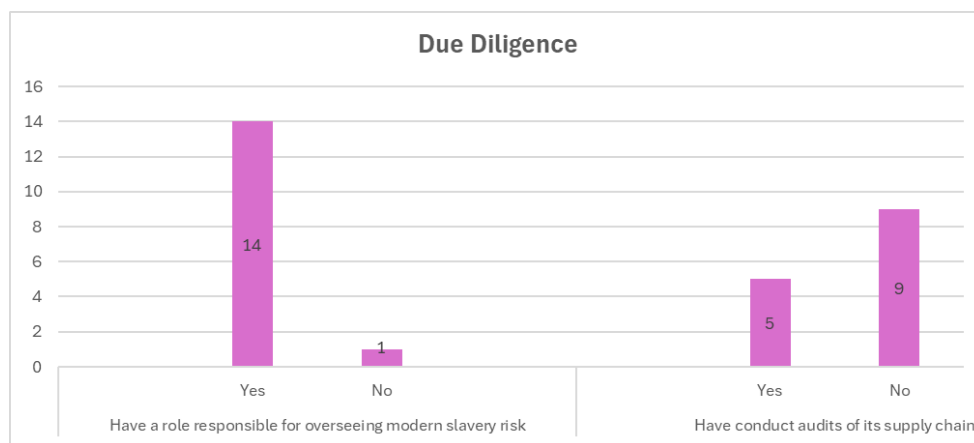
The below table outlines the policies and procedures Austin Health suppliers have in place when encountering Modern Slavery issues. The intent was to see how many suppliers have a policy, if it was communicated to staff, and how is it monitored. From the 15 respondents, 10 suppliers have policies in place regarding Modern Slavery.



Due Diligence

This section reviews what the supplier is doing to actively mitigate modern slavery. It considers what screening processes of suppliers are in place, the mapping of their supply chain and a compliance overview of procedures.

- 14 suppliers have a role that is responsible for identifying and overseeing modern slavery risks in relation to the goods/services they provide.
- 5 suppliers currently conduct independent audits of your operations and suppliers



- 4 suppliers have mapped at all levels supply chain for key product and services, 5 suppliers identified major Tier One suppliers.



Training

The below graph highlights the training and materials a supplier has across its operation/s to educate and bring awareness to modern slavery. 11 suppliers train their staff to identify, assess and respond to modern slavery risks.



Remedy

This segment reviews what processes and remedial action plans the organisation has to respond to allegations of Modern Slavery. 5 suppliers have remedy/ action plans to respond to allegations of Modern Slavery.



Risk Rating insights and Modern Slavery in the health care sector

The healthcare sector is considered high risk for modern slavery practices, due to the nature of the sector, geographical location of production facilities, and lack of transparency in supply chains. It relies on goods from high-risk sectors characterised by low-skilled labour, vulnerable populations, extensive subcontracting, and the use of labour agency contractors

Evidence shows that modern slavery is prevalent in the sourcing and production of health care goods, including: gloves; patient clothing; uniforms; footwear; sheets; towels; other textiles; surgical instruments; and electronic health care equipment. These goods are often produced in regions with weak or unenforced human rights protections, leading to significant worker exploitation with limited recourse.

While Austin Health is not directly involved in the production and/or manufacturing activities of medical goods, surgical equipment and medical suppliers, the greatest modern slavery risk arises from procuring these items from offshore suppliers in high-risk geographies (see graphic below). We recognise that the sourcing of raw materials and the production of these healthcare goods often involves hazardous working conditions, labour exploitation, child labour and other abuses.



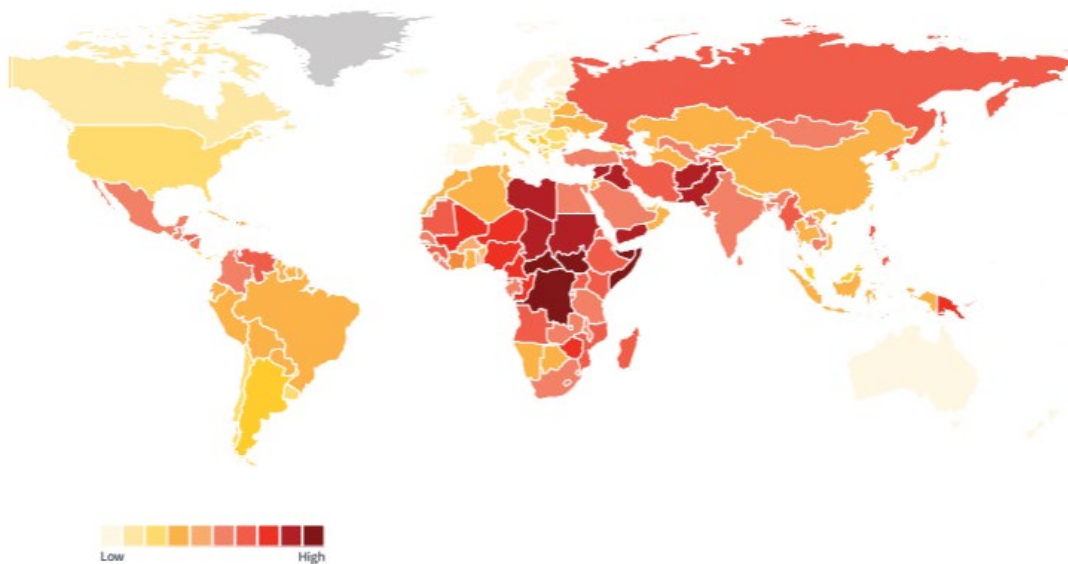
Specific modern slavery risks include:

- The sourcing of raw materials used to produce medical goods and instruments, including rubber, cotton, minerals, and metals, are also known to carry significant modern slavery risks
- Production of 150 million surgical instruments annually in Pakistan, with heavy reliance on the informal sector, and has been scrutinised for the use of child labour, hazardous working conditions, and other labour rights violations
- The rapid increase of migrant nurses and doctors with reported language barriers and a lack of trust and mutual respect. A lack of transparency in recruitment processes, and the use of labour agency contractors, tends to increase the risk of modern slavery for health care workers.

Note: The above insights are taken from:

- HSV Modern Slavery Risk Assessment Report, shared with Austin Health on 30 November 2023; and
- The 2021 KPMG report on Modern Slavery in the Health Services Sector (https://humanrights.gov.au/sites/default/files/document/publication/ahrc_20211115_modern_slavery_-_health_services_v9_web.pdf)

Estimated vulnerability to modern slavery by country



Actions taken

Criterion 4

The focus of our reporting period was to deliver the actions below. In this reporting period, Austin Health continued to work collaboratively with HSV to address sector wide Modern Slavery risks by attending all the HSV Modern Slavery Community Learning and Working Group Sessions.

Actions undertaken by Austin Health

The FY23-24 Actions Austin Health committed to were:

Modern Slavery Framework Component	Planned actions FY23-24	Details
Due Diligence		Continue to work with other health services to encourage HSV to take a centralised approach to conducting Risk Assessments.
	Modern Slavery Risk Assessment	Upon publication of the HSV Risk Assessment tool, group suppliers into the Procurement Policy spend thresholds (1: \$0 - \$25k, 2: \$25k - 250k and 3: >\$250k). Commence Risk Assessments on Threshold 3.
		This will be a high volume of work for Austin Health and suppliers, hence it is the main activity planned for FY23-24.
	Supplier Corrective Engagement Plan	Once the HSV Supplier Corrective Engagement Plan (Plan) template is published, develop and enact a Plan for any vendors assessed as having a high risk rating.
	Modern Slavery Risk Form	Implement a transparent and accountable reporting mechanism for all staff to report any instances or suspicions of modern slavery practices within the organisation.
Training	Grow Modern Slavery organisational awareness	Publish e-learning modules provided through the Australian Border Force Modern Slavery Register portal onto the Austin Health intranet for all staff to access.

Note: No specific 'Policy', 'Contract' or 'Remediation' component updates were committed to or required, but Border Force reporting guides suggest all Framework Components are listed, hence the minor Policy, Contract and Remediation update further down.



Due Diligence

1) Modern Slavery Risk Assessment (MSRA)

In FY23-24, Austin Health conducted an assessment using the MSRA tool provided by HSV on Threshold 3 non-HSV contracted suppliers across variety of high-risk operating industries. Following guidance from Border Force, Strategic Procurement prioritises assessments of industries or sectors with a high prevalence of modern slavery based on their characteristics, products, and processes.

The assessed suppliers' operating industries include:

- Cleaning and Waste
- Construction
- Consumables
- Drug Supplies
- Energy Resources
- Food Supplies
- Hospitality Supplies
- Medical Supplies
- Service Maintenance and Manufacture

For all tenders commenced in FY23-24, Strategic Procurement used a standardised template established in FY22-23 to evaluate modern slavery risk rating based on suppliers' responses to the Modern Slavery Risk Evaluation. The MSRA has since been designated as the sole risk screening tool for identifying modern slavery within Austin's supply chain, and it has been utilised to assess Austin's contracted suppliers and has been updated into procurement tender ITS documents, effective since May 2024.

2) Supplier Corrective Engagement Plan

HSV committed to developing a Supplier Corrective Engagement Plan, but it is currently unavailable. Therefore, Austin is awaiting guidance from HSV on the corrective engagement approach for non-HSV suppliers.

3) Modern Slavery Risk Form

The Modern Slavery Risk Form was published in FY23-24. It was shared through internal news communication and made accessible to all staff through the intranet. Staff are encouraged to submit through the Modern Slavery Risk Form if they identify any activities, behaviours, or practices that raise concerns regarding potential modern slavery within the organisation.

Training

1) Grow Modern Slavery organisational awareness

Austin Health has published and introduced e-learning modules that are provided through the Australian Border Force Modern Slavery Register portal on the intranet. Staff involved in procurement and purchasing activities are required to complete this training, while other employees, including clinical team members, are encouraged to participate to increase awareness of modern slavery. These modules have been designed to help all organisations understand what modern slavery is, and what can be done to practice ethical procurement practices, and rid slavery from global operations and supply chains.

These modules delve into the intricacies of modern slavery and comprising of:

- Modern Slavery in Public Procurement
- Identifying and Assessing Modern Slavery
- Managing Modern Slavery Risks.

Link: <https://modernslaveryregister.gov.au/resources/>

Policy

The Austin Health Procurement Policy was updated in FY22-23. No changes were made to Modern Slavery section as all requirements are covered. The Policy outlines Austin Health's commitment to addressing Modern Slavery by detailing Austin Health's: position on Modern Slavery, Modern Slavery Policy, Roles and



Responsibilities for implementation of the Modern Slavery Framework, Modern Slavery Statement, and the Modern Slavery Remediation Process.

Contract

All Austin Health contracts are up to date with Modern Slavery clauses.

Remediation

Austin Health is awaiting guidance from HSV on the tools to support supplier remediation, hence no actions were completed.

Ongoing Modern Slavery actions not listed above:

1) Austin Health Modern Slavery Risk Register

The Austin Modern Slavery Risk Register is a centralized system that documents modern slavery risk from all areas across the organisation, root causes. The register has been tabled at the Modern Slavery Working Group (MSWG) and is reviewed at the MSWG as required.

2) Modern Slavery Working Group (MSWG)

Austin Health has established the Modern Slavery Working Group which includes a diverse set of Austin staff and operate regular MSWG meetings every 10 weeks. The MSWG aims to drive initiatives to address modern slavery risks within the organisation, review the MS Risk Register and to assess and implement the modern slavery implementation plan.

The members of the MSWG include:

- Group Procurement Manager (Chair, Modern Slavery Statement Owner)
- Procurement Specialist (Modern Slavery Lead)
- Contract Administrator (Legal)
- Clinical Products Manager (Clinical)
- Cleaning Services Manager (Support Services - Cleaning, FM, Food etc.)
- Employee Relations Advisor (Talent, Workforce Planning and Employee Relations).

3) HSV Community Learning and Working Group Sessions

During FY23-24 Austin Health participated in HSV provided Modern Slavery community learning and Working group sessions, which assisted Austin Health in advancing our understanding of Modern Slavery as an organisation.

Sessions comprised of:

- July 2023 – Data evidence and risk analysis
- August 2023 – What a good statement looks like
- September 2023 – How to prepare for next year’s reporting
- October 2023 – Modern Slavery Supplier Risk Assessment Tool
- November 2023 – Supplier Risk Assessment results
- February 2024 – Health Service MS Reporting and HSV
- March 2024 – KPI's for effectiveness and internal risk assessments final
- April 2024 – HSV MS risk mitigation program, and training your frontline staff
- May 2024 – Community of learning
- June – Last minute tips for reporting

4) HSV Modern Slavery Risk presentation to non-HSV’s suppliers

During FY23-24, HSV delivered ‘Introduction to Modern Slavery Risk’ presentations to non-HSV suppliers as part of the HSV Modern Slavery Risk Mitigation Program. 5 AH’s suppliers but non-HSV contracted participated presentation sessions below. Sessions dates and time are as follow:

- 10th May 2024 10:00 am & 2:00 pm
- 21st May 2024 11:00 am & 2:00 pm
- 13th June 2024 11:30 am & 2:30 pm
- 27th June 2024 10:30 am & 2:30 pm.



Assessing the effectiveness of actions taken

Criterion 5

Assessment mechanisms undertaken by Austin Health

Austin Health understands the importance of assessing the effectiveness of actions taken to assess and address modern slavery. However, before measures of effectiveness are implemented, Austin Health is first focusing on setting up and implementing the Modern Slavery Framework and the appropriate tools to capture modern slavery risks. The FY24-25 planned activities below support this approach.

Planned activities for FY24-25

Table 2 – Austin Health modern slavery planned activities FY24-25

Modern Slavery Framework Component	Planned actions FY24-25	Details
Due Diligence	Modern Slavery Risk Assessment	Continue Risk Assessments on Threshold 3: >\$250k and Threshold 2: >\$25k suppliers. Provide support to HSV, who will be beginning to conduct annual modern slavery risk assessments on behalf of AH.
Remediation	Supplier Corrective Engagement	Understand supplier corrective engagement advice from HSV. Engage with high to very-high risk rated suppliers identified in FY23-24, using HSV letter template to inform them on how they can improve their modern slavery risk mitigation efforts and provide additional resources.
Training	Grow Modern Slavery organisational awareness	Work with HSV to embed HSV Modern Slavery modules into ATLAS and introduce through internal communications. Assess which modules should be mandatory for internal stakeholders who directly engaging with suppliers.
	Supplier Awareness Enhancement	Invite non-HSV suppliers to participate in HSV modern slavery information sessions, where suppliers can gain information to mitigate modern slavery risk in their operations and supply chains.



Consultation

Criterion 6

Consultation with owned or controlled entities

Austin Health does not own or control any other entities.



Closing statement

Austin Health is confident that the steps taken this year have continued to build a strong foundation for a robust modern slavery framework. We recognise there is more to do, and Austin Health is committed to continually improving our approach, partnering with our stakeholders, and working to eradicate modern slavery.

The Austin Health Board is pleased to see Health Share 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 statement was approved by the principle governing body of Austin Health as defined by the Modern Slavery Act 2018(Cth) (“the Act”) on 5 December 2024.

This modern slavery statement is signed by a responsible member of the Austin Health Board, as defined by the Act:



Ross Cooke
Board Chair

5 December 2024



For further information contact:

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Austin Health acknowledges the
Traditional Custodians of the land
and pays its respects to Elders
past, present and emerging.

