

Modern Slavery Statement

December 2025



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Acknowledgements

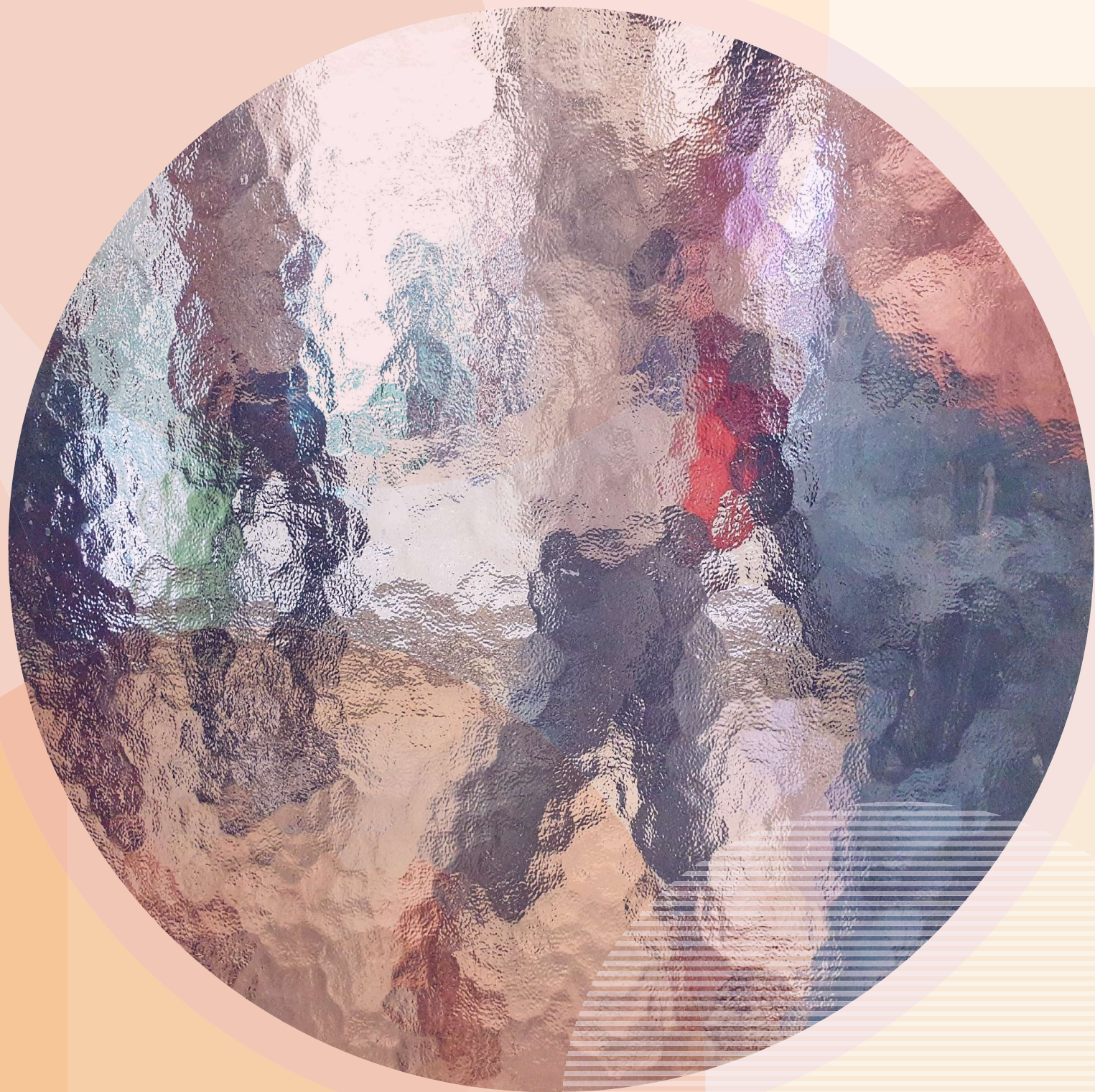
We acknowledge the people of the Kulin nations as the Traditional Custodians of the land on which our work in the community takes place. We pay our respects to their Elders past and present.

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 (Cth)*, 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 eight 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.

NWMPHN modern slavery statement

This statement outlines actions taken by North Western Melbourne Primary Health Network (NWMPHN) to identify, assess and address modern slavery risks in its operations and supply chains over the period of 1 July 2024 to 30 June 2025.

In this statement NWMPHN has reported against all seven mandatory items required in the Modern Slavery Act 2018 (Cth). These are:

- Identify the reporting entity
- Outline operations and supply chains
- Identify modern slavery risks
- Identify actions taken to address risks
- Evaluate effectiveness of actions taken
- Consultation with controlled entities
- Other relevant information

This statement was approved by the Board of Directors, Melbourne Primary Care Network Ltd on Tuesday 25 November 2025.



Damian Ferrie
Chair, MPCN Board
25 November 2025

1. Reporting entity

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 situated at Level 6, 737 Bourke St, 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

Melbourne Primary Care Network (MPCN) trading as North Western Melbourne Primary Health Network (NWMPHN) is an independent, locally governed and run, not for profit organisation dedicated to improving primary health care in local communities. NWMPHN is one of 31 Primary Health Networks (PHNs) across Australia, in operation since 1 July 2015.

PHNs were established with the key objectives of increasing the efficiency and effectiveness of medical services for patients, particularly those at risk of poor health outcomes, and improving coordination of care to ensure patients receive the right care in the right place, at the right time.

PHNs work with the primary health care sector to improve frontline services and collaborate with local hospital networks to ensure better integration between primary and acute care services.

NWMPHN is the largest PHN in Victoria. Its region covers approximately 3,212 square kilometres across the Melbourne CBD, northern and western suburbs and adjacent rural areas, encompassing 13 Local Government Areas.

NWMPHN works to improve health outcomes for communities by fostering innovation, leveraging and coordinating existing community and organisational assets, and driving value for money.

Our ethical foundation

At NWMPHN, our ethical commitment is anchored in four foundational values: respect, equity, collaboration, and innovation. These values are not just aspirational. They are actively demonstrated through a set of guiding principles that shape our behaviours, decisions, and interactions across all areas of our work.

Guiding principles for ethical governance

These principles define the standards of conduct expected from our staff and leadership, and inform how we engage with internal and external stakeholders:

- **Responsive:** We continuously refine our governance frameworks to ensure they remain relevant, effective, and fit for purpose.
- **Evidence-based:** Our decisions are informed by the best available data, research, and insights.

- **Consensus-oriented:** We strive for inclusive decision-making, valuing diverse perspectives to reach outcomes that benefit the collective.
- **Consumer-centric:** Consumers are at the heart of our governance, ensuring decisions lead to safe, high-quality health services.
- **Participatory:** We promote stakeholder representation in governance processes, with a focus on equitable inclusion.
- **Transparent and accountable:** We foster trust through clear, accessible documentation and open communication about our governance activities.
- **Effective and efficient:** Our governance mechanisms are designed to deliver meaningful outcomes that address community health needs proportionately and responsibly.

Commitment to integrity and safety

NWMPHN is dedicated to maintaining a safe and ethical environment where individuals can report concerns without fear of retaliation. We do not tolerate misconduct or wrongdoing by employees or officers, nor any form of victimisation against those who speak up.

Our commitment to addressing modern slavery

NWMPHN recognises that modern slavery represents one of the most severe violations of human rights. It encompasses serious criminal conduct and results in profound, often lifelong harm to its victims. Modern slavery involves the use of coercion, threats, or deception to exploit individuals and deprive them of their freedom. Often this is without the use of physical violence. Instead, perpetrators may rely on psychological manipulation, subtle intimidation, and control.

We acknowledge that modern slavery can occur in many forms and contexts, including within complex supply chains. As such, NWMPHN is firmly committed to identifying, preventing, and eliminating modern slavery risks within our operations and those of our suppliers.

Our commitment includes:

- Zero tolerance for any form of modern slavery or associated practices.
- Ongoing assessment and management of supplier risks to ensure ethical and responsible sourcing.
- Continuous improvement of our systems and processes to safeguard human rights and uphold ethical standards.
- Creating a culture of transparency and accountability, where concerns can be raised safely and without fear of retaliation.

Through these actions, NWMPHN aims to uphold the dignity, safety, and rights of all individuals connected to our work.

2. Structure, operations, and supply chains

Workforce and governance

NWMPHN employs 144 staff members (as of 30 September 2025). Our commitment to probity and good governance is central to how we operate, ensuring transparency, accountability, and ethical decision-making across all levels of the organisation.

Governance at NWMPHN is led by a Board of Directors, supported by clinical and community councils and several expert advisory groups. Together, these provide strategic oversight and informed guidance to ensure our work aligns with community health needs.

The Board serves as NWMPHN's primary governing body and is deeply committed to our vision: ensuring people receive the right care, in the right place, at the right time.

- Our Executive Team includes:
- Chief Executive Officer
- Executive Director, Systems
- Executive Director, Health Systems Integration
- Executive Director, Service Development and Reform
- Executive Director, Insight, Performance and Digital Services

NWMPHN has implemented robust governance arrangements, including clear review and approval pathways for procurement activities. These arrangements are designed to uphold:

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

Commissioning health services

NWMPHN receives annual funding from both the Australian and Victorian governments to support the health and wellbeing of the 1.9 million people living within our 3,212 square-kilometre catchment area. While our primary focus is on local communities, we are also entrusted to design, coordinate, and oversee programs that extend across Victoria and, at times, nationally.

Our commissioning approach is guided by a commitment to delivering needs-based, locally appropriate, consumer-centred, and evidence-informed solutions that address the health priorities of our region.

As of September 2025, NWMPHN managed 229 active contracts through our Commissioning Management System.

Our procurement and commissioning activities are underpinned by an approved Procurement Strategy and a robust Commissioning Framework, which outline the principles and methodology we apply. These processes are designed to ensure:

- value for money
- accountability and transparency
- probity and integrity

Through this structured and principled approach, NWMPHN ensures that commissioned services are effective, ethical, and aligned with the needs of the communities we serve.

Non-commissioning services

NWMPHN's supply chain includes suppliers from these industries to support our operations in non-commissioning related activities:

- information, communication and technology,
- property services,
- professional services,
- recruitment agencies,
- catering, and
- office supplies.



3. Modern slavery risks

NWMPHN is committed to upholding the highest standards of ethics and business integrity across its operations and supply chain. This includes ensuring that all staff and suppliers are treated fairly, with respect and dignity, and in alignment with the organisation's values and legal obligations.

Legislative context and oversight

NWMPHN became subject to the reporting requirements of the Modern Slavery Act 2018 (Cth) in July 2023 and has since published two Modern Slavery Statements outlining its approach to identifying and managing modern slavery risks. Oversight of these risks and compliance obligations is led by the Executive Director, Systems, who reports directly to the CEO and the Finance, Audit and Systems (FAS) Committee.

External risk exposure: supplier risk profile

NWMPHN's suppliers predominantly operate within the health care and not-for-profit sectors, which are generally considered low risk for modern slavery. The majority are based in Australia, a jurisdiction not classified as high risk, though NWMPHN acknowledges that modern slavery can and does occur domestically. The 2023 Global Slavery Index estimates 41,000 people were living in modern slavery in Australia in 2021.

To better understand its exposure, NWMPHN conducted a desktop review of its top 50 suppliers, representing approximately 68 per cent of total organisational spend from July 2023 to June 2024.

Key findings include:

- **Geographic footprint:** All suppliers were Australia-based with no overseas operations.
- **Risk classification:**
 - Low risk: 45 suppliers
 - Moderate risk: five suppliers
 - High risk: none
- **Modern slavery statements:** six suppliers had publicly available modern slavery statements.
- **Industry breakdown:**
 - Charity/not-for-profits: 24 suppliers
 - Health care providers and services: 19 suppliers
 - IT services and supplies: two suppliers
 - Catering: one supplier
 - Public entities: one supplier
 - People services: one supplier
 - Pharmaceuticals: one supplier
 - Real estate: one supplier
- **Verification checks:** No anomalies were identified in ABN or registered name verification against ASIC records.
- **Next steps:** The five moderate-risk suppliers have been shortlisted for further assessment via the next round of NWMPHN's Modern Slavery Supplier Survey (along with other selected suppliers).

This review supports NWMPHN's commitment to proactive risk identification and continuous improvement in supplier due diligence.

Internal risk controls and NWMPHN self-assessment

NWMPHN completed its own Modern Slavery Supplier Survey and received a low-risk rating (score: 3/10). This reflected supplier exposure to high-risk industries and the presence of migrant workers. However, NWMPHN has strong internal controls and policies in place to mitigate modern slavery risks within its own operations.

Employment practices

NWMPHN has employment practices that align with national legislation and ethical standards, ensuring fair and lawful treatment of all staff and contractors. These include:

- Equitable and fair recruitment practices aligned with the MPCN Enterprise Agreement 2024 and Fair Work Act 2009 (Cth). NWMPHN is an equal employment opportunity employer.
- Right-to-work checks via VEVO Check – Department of Home Affairs.
- No retention of original identification documents. These are stored via CrimCheck, a third-party ID verification provider.
- Transparent employment contracts outlining pay and entitlements, through a publicly accessible enterprise agreement and following industry best practice.
- Compliance with minimum legal working age.
- Lawful and unrestricted resignation rights.
- Payment of staff in accordance with legal entitlements, including overtime and benefits.

Policies and procedures

A suite of organisational policies supports NWMPHN's commitment to ethical conduct, transparency, and accountability.

These are:

- Code of conduct for stakeholders
- Conflict of interest policy
- Feedback and complaints policy and process
- Human resource manual and HRIS user guide
- Modern Slavery Policy
- MPCN Enterprise Agreement 2024
- Procurement Policy and Strategy
- Protected Disclosures (Whistleblower) Policy
- Supplier Code of Conduct

Continuous improvement

NWMPHN continues to strengthen its modern slavery compliance through targeted initiatives, such as:

- **Supplier engagement:** Ongoing surveys, collaborative workshops, and a phased rollout of the Supplier Code of Conduct.
- **Policy integration:** Ethical onboarding, clear reporting and escalation pathways.
- **Staff training:** Mandatory LMS modules, tailored ICM training, and regular internal communications.
- **Governance:** Annual statement submission (regardless of threshold), centralised records, risk profile register, and active Modern Slavery Working Group collaboration.
- **Sector collaboration:** Partnership with HealthShare Victoria to align and strengthen efforts.

NWMPHN recognises that modern slavery risks can exist even in low-risk sectors and jurisdictions. Through structured assessments, robust internal controls, and continuous improvement, NWMPHN is committed to ethical sourcing, transparency, and compliance with evolving legislative reforms.

4. Actions taken

During this reporting period, NWMPHN strengthened its modern slavery risk management framework by building on 2024 initiatives. Key actions focused on embedding compliance into core business practices, enhancing supplier accountability, and increasing staff capability.

Policy implementation – Supplier Code of Conduct (SCC)

- ✓ Finalised and implemented the SCC following extensive internal consultation across departments.
- ✓ Developed a supplier fact sheet and internal guide to support adoption.
- ✓ Embedded modern slavery and SCC clauses into NWMPHN's standard agreements for commissioned services.
- ✓ Updated procurement templates, to include commitment to the SCC as a mandatory criterion.
- ✓ Launched internal and external communications to promote SCC awareness.
- ✓ Commenced development of a contract management core training module to embed SCC principles and risk mitigation into daily practice.

Staff engagement and awareness

- ✓ Delivered targeted information sessions to:
 - Internal Contract Managers (ICMs)
 - Senior Leadership Team (SLT)
 - All staff via the CMS Community of Practice
- ✓ Published NWMPHN's Modern Slavery Statement on the website and shared it internally via *The Thread* and externally via *Network News*.
- ✓ Provided access to a Modern Slavery Learning Management System (LMS) training module to support ongoing staff development.

Supplier engagement and risk assessment

- ✓ Released the second round of the Modern Slavery Supplier Survey to assess supplier risk across six key areas, including overseas operations, industry exposure, and subcontractor controls.
- ✓ Shortlisted 15 suppliers based on contract value, industry type, and prior survey history. Of the 15:
 - one was assessed as high risk
 - eight were assessed as moderate risk
 - two were assessed as low risk
 - two did not respond
 - two were excluded post-review
- ✓ Compared to 2024, results show a shift from low to moderate risk classifications, indicating improved risk identification or evolving supplier profiles. These indicators do not confirm the presence of modern slavery but highlight areas for deeper engagement and continuous improvement.
- ✓ High risk and moderate risks suppliers were flagged for further engagement and due diligence.

Governance and reporting

- ✓ Convened regular Modern Slavery Working Group (MSWG) meetings to monitor progress and drive implementation.
- ✓ Raised awareness of modern slavery obligations among the Board and Senior Management.
- ✓ Modern slavery is actively considered and discussed in leadership and committee forums. Where modern slavery risks are identified or assessed as a high, they are escalated and incorporated into the organisational risk profile register to ensure appropriate oversight and mitigation and to support targeted risk management and accountability.

Accreditation and policy integration

- ✓ A comprehensive legal review of NWMPHN's policies and procedures was undertaken in 2023 to assess alignment with modern slavery compliance obligations. Relevant documents were updated following this review. NWMPHN maintains compliance with applicable legal and regulatory requirements through its current accreditations, including ISO9001, ISO27001, and the National Safety and Quality Digital Mental Health Standards (NSQDMHS).

Sector collaboration

- ✓ Engaged with the Victorian and Tasmanian Primary Health Network Alliance (VTPHNA) to explore shared supplier surveys and joint statement development

Note: NWMPHN was the only PHN reporting on modern slavery in 2023–24, limiting collaboration opportunities.
- ✓ Initiated collaboration with HealthShare Victoria to align sector-wide efforts and share best practices.

Forward commitments

NWMPHN will continue to strengthen its modern slavery framework through:

- ✓ **Governance:** Ongoing review of policies, contracts and documentation.
- ✓ **Risk management:** Monitoring survey completion, corrective actions, and supplier follow-up.
- ✓ **Communication:** Promoting awareness and monitoring whistleblower trends.
- ✓ **Training:** Ensuring relevant staff receive targeted education on modern slavery risk identification and mitigation.

NWMPHN encourages all staff and suppliers to report suspected or actual instances of modern slavery through its Whistleblower Policy, which provides a safe and confidential mechanism for disclosure.

5. Assessing effectiveness of actions

NWMPHN evaluates the impact of its modern slavery initiatives through measurable indicators aligned with governance, procurement, and compliance frameworks

Area	KPI
Supplier risk management	85 per cent supplier survey response rate (a five per cent increase in supplier response rate from 2024) 100 per cent follow-up planned on moderate/high-risk suppliers
Policy integration	Triennial review of all relevant policies SCC embedded in 100 per cent of new commissioned services contracts from September 2025
Training	92 per cent completion rate of Modern Slavery LMS module
Governance	MSWG meetings held every two months Annual review of modern slavery risk for potential inclusion in the Risk Profile Register.
Reporting and transparency	Zero incidents of modern slavery reported Modern Slavery annual statement submission regardless of revenue threshold

6. Consultations

NWMPHN does not own or control any other entity. NWMPHN will continue to liaise, as appropriate, with other primary health networks and HealthShare Victoria regarding their modern slavery tools, processes and practices.

7. Other information

NWMPHN considers that this statement meets the reporting criteria outlined in the Modern Slavery Act 2018 (Cth). The organisation remains confident that the actions taken to date have established a solid foundation for a robust and responsive modern slavery framework.

While acknowledging that modern slavery risk management is an ongoing journey, NWMPHN is committed to continuous improvement. This includes:

- strengthening internal controls and supplier engagement,
- collaborating with sector partners, and
- promoting transparency and ethical practices across all operations.

NWMPHN will continue to evolve its modern slavery framework in line with sector best practice, legislative reform, and stakeholder expectations.



