

# COMPLIANCE



# Ministerial directives

Treasurer's Instructions 903(12) require disclosure of information on any ministerial directives relevant to the setting or achievement of desired outcomes or operational objectives, investment activities and financing activities.

In March 2023, the EMHS Board received the Minister for Health's **Statement of Expectations** regarding the priorities and accountabilities of the EMHS Board. The EMHS Board released a **Statement of Intent** in response and throughout 2023-24 has continued to report progress against the Minister's Statement of Expectations.

Both documents are publicly available on the EMHS website:

<https://emhs.health.wa.gov.au/About-Us/Health-Service-Board>

On 25 July 2023, the Minister for Health; Mental Health issued a directive to EMHS to commence working with the Mental Health Commission towards transitioning the Next Step Drug and Alcohol Service from the Mental Health Commission to EMHS.

EMHS continues to progress and report on election commitments including the Armadale Mental Health Emergency Centre, the Royal Perth Hospital (RPH) Innovation Hub, the Byford Health Hub and the Bentley Surgicentre.

# Government policy requirements

## Summary of board and committee remuneration

Board / committee	Total remuneration (\$)
EMHS Board	474,036
Human Research Ethics Committee	0

## Work health and safety management

Please see information on [page 36](#)

## Asbestos reporting

EMHS has risk-based asbestos management plans and registers in place which are regularly reviewed and updated, and has been actively removing asbestos-containing materials during refurbishments/renovations of its facilities.

EMHS has recently awarded a new contract for the ongoing Asbestos Audit and Air Monitoring services across its facilities.

## WA Multicultural Policy Framework

Please see information on [page 55](#)

# Other financial and governance disclosures

## Pricing policy

EMHS charges for goods and services rendered on a partial or full cost recovery basis and complies with the *Health Insurance Act 1973*, the Addendum to National Health Reform Agreement (NHRA) 2020-25, the *Health Services Act 2016* (WA) (HSA 2016), and the WA Health Funding and Purchasing Guidelines 2017-18. These fees and charges are determined through the WA Health costing and pricing authorities and approved by the Minister for Health.

Guidelines for rules in relation to fees and charges are outlined in the WA Health Fees and Charges Manual. This is a mandatory document in the WA Health Financial Management Policy Framework and binding to all Health Service Providers (HSPs) under the HSA 2016.

## Indemnity insurance

In 2023-24, the amount of the insurance premium paid to indemnify directors of the EMHS Board [with ‘director’ defined as per Part 3 of the *Statutory Corporations (Liability of Directors) Act 1996* (WA)] against a liability incurred under sections 13 or 14 of that Act was **\$94,409.70** (including GST).



## Employment and staff development

Please see information on [page 27](#).

## Worker's compensation

Please see information on [page 38](#).

## Industrial relations

EMHS have engaged with the WA Health System in contributing to negotiations for new Industrial Agreements for 2024-25 including:

- WA Health System - Medical Practitioners – Australian Medical Association (AMA) Industrial Agreement 2022
- WA Health System - Medical Practitioners (Clinical Academics) - AMA Industrial Agreement 2022
- WA Health System – Australian Nursing Federation – Registered Nurses, Midwives, Enrolled (Mental Health) and Enrolled (Mothercraft) Nurses – Industrial Agreement 2022
- WA Health System – Health Services Union of WA (HSUWA) – PACTS Industrial Agreement 2022
- WA Health System – United Workers Union (WA) – Enrolled Nurses, Assistants in Nursing, Aboriginal and Ethnic Health Workers Industrial Agreement 2022
- WA Health System – United Workers Union (WA) – Health Support Workers Industrial Agreement 2022
- WA Health System Engineering and Building Services Agreement 2023.

EMHS continued with its commitment to a permanent workforce and to reducing its reliance on agency workers and a casual workforce.

## Major upgrade for Pharmacy Aseptic Compounding Unit

A multi-million-dollar upgrade to the Royal Perth Hospital (RPH) Aseptic Compounding Unit was practically completed in April 2024 and commenced full service from 18 June 2024.

The unit upgrade allows RPH Pharmacy staff to prepare individualised, high-quality pharmaceutical treatments in a safe and purpose-built environment, including all the chemotherapy for RPH patients.

The improvements were funded by the WA and Australian Governments and took 11 months to complete.

Sir Charles Gairdner Hospital helped with compounding pharmaceutical needs during that time by allowing RPH staff to use their facilities.

More than **20,000** treatments will be prepared in the unit each year.



## Capital works

EMHS made a substantial investment in the improvement and development of its infrastructure during 2023-24.

Incomplete capital works (as at 30 June 2024)						
Project title	Expected year of completion	Estimated remaining cost to complete (\$'000)	Estimated total cost of project in 2023-24 (\$'000)	Reported in 2022-23 (\$'000)	Variance from previous financial year (\$'000)	Explanation of variance ( ≥ 10%)
Royal Perth Hospital Helipad	2024/25	0	10,075	10,075	0	
Royal Perth Hospital - Fire risk	Ongoing	4,369	9,963	9,963	0	
Election commitment - Royal Perth Hospital Mental Health Observation Area (MHOA)	2024/25	459	13,495	13,495	0	
St John of God Midland Mental Health Emergency Centre	On hold	5,086	6,021	6,021	0	
Election commitment - Royal Perth Hospital - Intensive Care Unit	2024/25	342	28,254	28,254	0	
Bentley Health Service redevelopment	2024/25	132	7,254	7,254	0	
EMHS fire safety upgrades	2028/29	2,443	7,000	7,000	0	
Election Commitment - Royal Perth Hospital Aseptic Unit	2025/26	400	8,739	8,739	0	
St John of God Midland cladding	2024/25	0	1,838	1,838	0	
RPH Innovation Hub	2025/26	0	2,308	10,640	(8,332)	Approved reduction in capital funding.
Bentley Health Service Secure Extended Care Unit	2027/28	55,084	56,640	39,222	17,418	Approved injection of additional capital funding.
Urgent Mental Health anti-ligature works at Bentley Hospital	2024/25	634	3,898	3,898	0	
EMHS Health in a Virtual Environment	2025/26	3,499	22,893	22,892	1	
EMHS Wi-Fi rollout	2024/25	0	11,128	11,128	0	
Mental Health Emergency Centres (MHEC): Armadale	2027/28	14,786	15,766	15,766	0	
Electronic Medical Record (EMR)	2024/25	3,288	12,358	3,200	9,158	Approved injection of additional capital funding.
Byford Health Hub	2027/28	41,282	42,150	42,150	0	
EMHS Anti-ligature Remediation Program	2025/26	598	5,000	5,000	0	
St John of God Midland Public Hospital expansion	2025/26	80,259	81,059	0	81,059	New project.
Bentley Health Service Surgicentre	2029/30	166,702	167,002	0	167,002	New project.
Refurbishment of Ward 2K at Royal Perth Hospital	2025/26	2,062	7,000	0	7,000	New project.
Anti-Ligature Remediation Program - Statewide	Ongoing	5,242	5,242	0	5,242	New project.
RPH A Block window replacement	2026/27	1,500	1,500	0	1,500	New project.
RPH high voltage switchgear	2026/27	3,000	3,000	0	3,000	New project.
St John of God Midland Health Campus – Master planning project	2024/25	3,000	3,000	0	3,000	New project.

Capital works completed in 2023-24				
Project title	Estimated total cost of project in 2023-24 (\$'000)	Reported in 2022-23 (\$'000)	Variance from previous financial year (\$'000)	Explanation of variance (≥ 10%)
Kalamunda Hospital - Palliative care services	9,350	9,350	0	
Emergency Asset Investment Program (AIP) works	6,805	6,805	0	
4 x 30 bed modular (120 bed modular)	2,794	2,299	495	Approved injection of additional capital funding.
COVID-19 EMHS 50 beds	1,600	1,600	0	
AS4187 sterilisation	900	900	0	

Notes:

- The above information is based upon the:
  - 2022–23 EMHS published annual report
  - 2024–25 published State Budget Papers and 2024-25 Service Agreement for EMHS.
- Completion timeframes are based upon a combination of the approved delivery schedule, scope, and budget at the time of reporting and reflect the financial completion of the project.
- Only capital projects that were administered by EMHS are reflected in the table.
- Incomplete capital works is defined to be financially incomplete projects and completed is defined to be financially completed or fully expended projects.
- Estimated total cost of project and estimated remaining cost to complete are reflected as per the 2024-25 Service Agreement and are subject to changes following outcomes of future mid-year review and budget process.
- Variance represents the difference between the estimated total cost of the project in the 2024-25 published Budget Papers in comparison to the total cost or estimated total cost of the project as reported in the 2022–23 EMHS Annual Report. An explanation is provided where a variance is greater than or equal to 10 per cent.



RPH Ward 2K redevelopment

# Other legal disclosures

## Unauthorised use of credit cards

WA Government purchasing cards can be issued by EMHS to employees where their functions warrant usage of this facility.

These credit cards are not to be used for personal (unauthorised) purposes (i.e. a purpose that is not directly related to performing functions for the agency).

All credit card purchases are reviewed by someone other than the cardholder to monitor compliance. If during a review it is determined that the credit card was used for unauthorised purchases, written notice must be given to the cardholder and the EMHS Board.

EMHS had 2 instances (total amount of **\$17**) where a purchasing card was used for personal purposes in 2023-24. A review of these transactions confirmed they were immaterial and the result of genuine and honest mistakes.

No further action was deemed necessary as prompt notification and full restitution was made by the individuals concerned. These were not referred for disciplinary action.

Within the period of 1 July 2023 to 30 June 2024:	Total
Instances of use for personal purposes	2
Aggregate amount of personal use expenditure	\$17.00
Aggregate amount of personal use expenditure settled by a due date	\$17.00
Aggregate amount of personal use expenditure settled after a due date	\$0
Aggregate amount of personal use expenditure remaining unpaid at end of financial year	\$0
Number of referrals for disciplinary action instigated by the notifiable authority	0

## Expenditure on advertising

In 2023-24, EMHS did not incur any expenditure on advertising in accordance with section 175ZE of the *Electoral Act 1907* (WA).

## Compliance with public sector standards and ethical codes

### Public Sector Standards

The Public Sector Standards in Human Resource Management (the standards) set out the minimum standards of merit, equity and probity to be complied with by WA public sector bodies and their employees. The Department of Health and EMHS maintain Human Resources (HR) policies and guidelines that are consistent with the standards.

These are available to all employees on the EMHS intranet and/or the Department of Health policy frameworks internet pages.

Information about the public sector standards is promoted and available to employees via:

- notification of the breach claim rights and processes, including relevant deadlines applicable to the standards
- information, fact sheets, policies and guidelines on the EMHS intranet
- recruitment, selection and appointment training for recruiting managers and panel members
- the EMHS peak performance training for line managers.

The HR Directorate provides information, guidance and support to all managers to promote best practice and application of these policies and procedures and manages any claims made against the standards. Advice is also provided where appropriate, in order to reach a prompt, satisfactory outcome at the most appropriate level.

During 2023-24, there were:



**9** breach of standard claims lodged against the employment standards



**4** were resolved internally and withdrawn



**1** is currently being managed by HR



**4** were referred to the Public Sector Commission



**0** breach of standard claims for grievance resolution, performance management, termination or redeployment standards.

## Code of Conduct

Integrity and ethical behaviour are integral to EMHS' core business. EMHS regularly encourages staff to reflect on the EMHS values (including accountability, integrity and respect) and to incorporate these into their work.

To support awareness of their responsibilities, new staff receive and acknowledge the Code of Conduct as a part of their offer of employment to work with EMHS. Responsibility for workplace behaviours and conduct is reinforced at formal induction and through completion of mandatory training.

During 2023-24, EMHS developed an Integrity Strategy, intended to update and embed integrity related policies and procedures and to raise staff awareness of those policies and the pathways by which breaches of those policies can be reported. The Integrity Strategy includes the:

- **Integrity and Ethical Governance Framework** - to describe the principles, organisational structures and mechanisms, along with the cultural factors, that guide how EMHS practices, manages and accounts for integrity.
- **Fraud and Corruption Control System** - developed to address fraud and corruption risks aimed at reducing EMHS' exposure to fraud and corruption.
- **Reporting Inappropriate Behaviours Procedure** – which describes staff obligations in relation to reporting any instance of inappropriate workplace behaviour or staff conduct, along with the range of pathways by which such conduct can be reported.

The Strategy includes the development of an integrated communications strategy for the promotion of the above policies and available reporting pathways.

EMHS commenced **49** disciplinary processes in relation to potential breaches of policy and/or the Code of Conduct in 2023-24. All suspected breaches of discipline, including reportable misconduct, were managed in accordance with the requirements of the WA Health Discipline Policy and where appropriate, were reported to external oversight agencies as required by legislation.

During 2023-24, EMHS established the Ethical Conduct Advisory Committee (ECAC), the function of which includes development and management of:

- strategies to improve integrity awareness, compliance and culture
- the EMHS Integrity and Ethical Governance Framework
- EMHS integrity related policies and procedures, and related documents for staff awareness, education and EMHS wide improvements
- integrity and ethical governance issues, to ensure compliance with relevant policy and statutory obligations.



## East Metropolitan Health Services diversity and inclusion

EMHS is committed to becoming a leader in diversity and inclusion, striving for representation targets that reflect the diverse communities we serve.

To attract and keep talented people working in our organisation, we are dedicated to nurturing a culture of inclusion at work. We know staff who are engaged, feel supported and safe, are more productive and can provide EMHS and our community better service, leading to better health outcomes overall.

In the most recent Department of Health survey, EMHS employees highly rated their commitment to organisational goals, their ability to make good use of their skills and abilities, and understanding how their contributions help EMHS achieves its overall objectives. We aim to build on this through our inclusion activities.

As part of our effort this year, EMHS has:

- With **83** new champions trained, expanded our Aboriginal Health Champions program – for non-Aboriginal staff to become allies for Aboriginal consumers and staff, contributing to Aboriginal health outcomes.
- Engaged in targeted programs to employ students with disability, from Aboriginal and Torres Strait Islander backgrounds, and from culturally and linguistically diverse backgrounds. These programs include the Public Sector Commission's Solid Futures program, the pilot vacation placement program for university students and the School Based Traineeship program. EMHS also continued engaging interns through the McCusker Centre for Citizenship (UWA).
- **10** employed Aboriginal young people and graduates.
- With **109** Aboriginal staff, work is continuing on increasing opportunities for Aboriginal peoples in our workplace through focused employment initiatives such as using the exception in the *Equal Opportunity Act 1984* (WA) and Commissioner's Instruction 39.

EMHS has exceeded the government's aspirational target for the representation of women in senior/executive roles (50 per cent) with 56 per cent of these roles filled by women.

In the latest data 19.6 per cent of our staff identify as being from a Culturally and Linguistically diverse (CALD) background, significantly surpassing the government's aspirational target of 5 per cent.

EMHS was the only HSP to onboard and successfully place 5 Aboriginal and Torres Strait Islander students for a two-week placement during their university study break. The program enables students to earn, gives them a taste of working in the Health environment and gives them the opportunity to learn some of the skills they need to be job ready.

With ongoing focus on inclusion, EMHS continues to be an employer of choice for the best and brightest and evolves to better reflect the communities in our care.

## Disability access and inclusion

EMHS is committed to ensuring people with disability, as well as their families and carers, have equitable access to our services, facilities, employment and information, consistent with EMHS' vision and values and in compliance with the *Disability Services Act 1993* (WA) (DSA).

The [EMHS Disability Access and Inclusion Plan \(DAIP\)](#) outlines our strategies and actions for meeting the 7 disability outcome areas identified in the *Disability Services Regulations 2004*.

Throughout 2023-24, a range of developments helped improve outcomes for consumers and staff with disability.

### General services and events

**Outcome one:** People with disability have the same opportunities as other people to access the services of, and any events organised by, a public authority.

EMHS has a significant, long-term commitment to improve access to its services and events.

In 2023-24, this included:

- Launch of the First Steps program, aimed at enhancing care for people on the autism spectrum accessing services across our sites. The program includes guidance to staff in the use of safe, affirmative language and developing effective communication with autistic patients and their families via helpful resources - helping staff understand the impact that care environments, including the emergency department (ED), can have on autistic consumers.
- Significant International Day of People with Disability events were held across EMHS, including staff education and awareness raising, and community engagement activities. The highlight was having the Western Australian Institute of Sport (WAIS) and the Fremantle Dockers come together in a wheelchair basketball coaching session and exhibition match at Bentley Health Service (BHS).
- Animal therapy across EMHS has continued to expand, including having the Royal Perth Hospital (RPH) and BHS Occupational Therapy (OT) Department staff present on the Dog Therapy Visitation Program at the National OT Exchange Conference.



Bentley Health Service patient Pamela with Delta Therapy Dog 'Takumi'

### Buildings and facilities

Outcome two: People with disability have the same opportunities as other people to access the buildings and other facilities of a public authority.

Regular and ongoing maintenance of EMHS buildings, grounds, car parks and facilities ensure we comply with relevant disability and access requirements.

Further improvements were made in 2023-24 by:

- locating a dedicated, permanent wheelchair bay within the Royal Perth Hospital (RPH) Emergency Department (ED) waiting room, improving access to the department
- reviewing the RPH Outpatient Department accommodation with the aid of a consumer with disability, to provide better care facilities for people with disability
- creating a dementia friendly garden at Armadale Health Service (AHS), designed to incorporate disability access principles and provide a therapeutic space that enhances the wellbeing of consumers
- improving disability friendly spaces for staff and consumers, with Bentley Health Service (BHS) developing a quiet space for staff and patients within Q Block and RPH creating a Staff Wellness Room within A Block
- installing a number of wheelchair ramps at BHS M Block, ensuring better access to the basketball courts and external patio area. New wheelchair accessible outdoor tables have also been installed.

### Information and communication

Outcome three: People with disability receive information from a public authority in a format that will enable them to access the information as readily as other people are able to access it.

EMHS publications and patient information is regularly reviewed to ensure it meets the needs of healthcare users, includes adequate information, is available in different formats and uses appropriate language.

Initiatives in 2023-24 included:

- continued improvement of wayfinding across EMHS, by providing branding and accessibility guidelines for navigational services
- introducing Patient Care Boards in BHS Older Adult and Rehabilitation wards as an additional communication strategy with patients, carers and multidisciplinary teams, capturing “what matters to me most” for patients
- improved access to information on EMHS intranet pages as part of improvements to EMHS web services.

### Quality of service

Outcome four: People with disability receive the same level and quality of service from the staff of a public authority as other people receive from the staff of that public authority.

A range of strategies has been introduced at EMHS to ensure people with disability receive the same high level of care. Key actions in 2023-24 included:

- continued adoption of staff equity, diversity and inclusion training for staff, including a module on disability inclusion and awareness
- new eLearning provided to staff on National Disability Insurance Scheme (NDIS) basics, helping clinicians gain a greater understanding of the NDIS and how to access the scheme
- increased disability resources for staff on the EMHS intranet
- a 'grand round' presentation by 2 EMHS staff members who are working and living with disability
- continued implementation of the dementia friendly program, in line with RPH working towards becoming the first health service in Australia to become dementia-friendly.



### Complaints and safeguarding

Outcome five: People with disability have the same opportunities as other people to make complaints to a public authority.

EMHS reviewed its complaints management policy again in 2024 to continue to ensure it maximises the way feedback and complaints are received.

Additional strategies to receive feedback include the inclusion of QR codes on posters and brochures to increase the options for providing feedback.

### Consultation and engagement

Outcome six: People with disability have the same opportunities as other people to participate in any public consultation by a public authority.

Broad consultation with consumers is regularly undertaken in the delivery and design of EMHS services.

This includes consumers and staff with lived experience of disability sitting on EMHS Disability Access and Inclusion Committees and Consumer Advisory Committees, and being involved in the review of services, policies and programs. EMHS also regularly engages with the community and disability service providers as part of its service planning process.

### Employment people and culture

Outcome seven: People with disability have the same opportunities as other people to obtain and maintain employment with a public authority.

EMHS is committed to ensuring people with disability can obtain and maintain employment. During 2023-24:

- EMHS staff participated in and promoted the inaugural Staff with Disability and Allies Network annual conference
- staff bathroom facilities in administrative areas of the hospital were refurbished
- EMHS workforce policies were reviewed to ensure they featured equity, diversity and inclusion principles.





## Recordkeeping

The *State Records Act 2000* (WA) (the Act) mandates the statutory recordkeeping practices for State Government agencies.

Section 19 of the Act states that every government organisation must have a Recordkeeping Plan (RKP) that has been approved by the State Records Commission. In May 2024, EMHS submitted for approval an amended RKP to the State Records Commission in line with its legislative obligations.

EMHS undertook an internal audit in August 2023 which highlighted areas for development against the mandatory principles across the 7 Records Management Standards. The suite of findings against the audit scope found that there are 5 crucial themes that require significant improvement to support a successful uplift in records management policy and practices. Work is being undertaken to progress the implementation of audit recommendations.

The Recordkeeping Awareness Training program forms part of the mandatory learning program for all staff and is usually completed upon induction. The training outlines the roles and responsibilities of EMHS employees in complying with the RKP and relevant policies. The Corporate Recordkeeping area is also in the process of developing a robust training program for the Electronic Document Records Management System (EDRMS), which will offer face to face as well as online training modules.

EMHS continues to roll out the EDRMS across EMHS corporate areas. Since the implementation in 2019, there have been **963,656** records saved to 30 June 2024, with **507** active users within the system. Compliance audits are conducted, ensuring the EDRMS is being maintained and corporate records are captured appropriately.

## Freedom of information

The *Freedom of Information Act 1992* (WA) (FOI Act) gives all Western Australians a right of access to information held by EMHS. Access to information can be made through a Freedom of Information (FOI) application, which should be addressed to the FOI Office at the appropriate EMHS site\*.

FOI applications can be granted full access, partial access or access may be refused in accordance with the FOI Act.

In 2023-24, EMHS sites collectively received **4,238** new applications under FOI legislation.

### New FOI applications received in 2023-24

#### Armadale Kalamunda Group (AKG)

(includes Swan Districts Hospital – general patient records)

67 Non-personal applications

583 Personal applications

#### Royal Perth Bentley Group (RPBG)

(includes Swan Districts Hospital and Midland Community Mental Health – mental health records)

489 Non-personal applications

3,085 Personal applications

#### EMHS Corporate

6 Non-personal applications

8 Personal applications

\*Please see [page 200](#) for contact information for FOI at EMHS.