

# MODERN SLAVERY STATEMENT

1 July 2023 – 30 June 2024



**This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) (the Act) in respect of Latrobe Community Health Service Limited ACN 136 502 022 (LCHS) and this statement is prepared for the period 1 July 2023 to 30 June 2024 (Reporting Period).**

Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. 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, and the worst forms of child labour.

LCHS is a secular, charitable not-for-profit health service. We are inspired by a vision of strong, vibrant communities where more people enjoy good health and fulfilling lifestyles. Improved access to healthcare and better information about healthy lifestyle choices are the building blocks of strong communities. We are particularly committed to helping the people who need us most, especially those with several health problems and high support needs. LCHS acts with integrity at all times and does not accept slavery or forced labour in any way.

## 1. The Reporting Entity

LCHS is incorporated under the Corporations Act 2001 as a public company limited by guarantee. LCHS is the Reporting Entity for the purposes of the Act, having met the reporting threshold in the Reporting Period. Annual reporting information about LCHS is available from the Australian Charities and Not-for-profits Commission (ACNC). LCHS is governed by a skills-based Board of up to nine directors who are elected by LCHS members or appointed by the Board.

As a not-for-profit health service, our core interest is improving the health of the community which extends to our commitment to addressing modern slavery risk.

LCHS controls Latrobe CHS Nominees Pty Ltd ACN 637 963 814 although this entity did not conduct any operational activities during the Reporting Period. This entity was deregistered as at 30 October 2024.

LCHS formerly controlled Link Health and Community Limited ACN 136 877 702. However, this entity was placed under external administration on 29 September 2022 pursuant to a members' voluntary winding up. ATO clearance was granted 2 July 2024 and we are working with external legal support on next steps. The entity has not traded or conducted any operational activities during the Reporting Period.

LCHS as the sole member of Latrobe Community Assessment and Navigation Services Limited ABN 62675766579 is deemed to control this entity although this entity did not conduct any operational activities during the Reporting Period.

## 2. The entity's structure, operations and supply chain

The role of the LCHS Board is to drive the strategic direction of the organisation. Working with the CEO, the Board enables the organisation to obtain the resources, funds and personnel necessary to implement LCHS's strategic objectives. These objectives include:

- partnering with more communities to drive better health, better lifestyles and strong and inclusive communities;
- strengthening our position as an independent, trusted provider of high quality, evidence-driven health and social services;
- using our influence to drive a stronger, fairer health system; and
- ensuring that we have the right culture and leadership, workforce and organisational capability, infrastructure and finances to deliver world-class services.



LCHS' services include GP, nursing; allied health; dental; counselling and psychology; gambling support; alcohol and drug treatment; migrant and refugee settlement services; social connection and carer support services in Gippsland and metropolitan Melbourne. We provide planning and early childhood early intervention services for the National Disability Insurance Scheme (NDIS) across Victoria. We also provide planning and community connection services for the NDIS in South Eastern Sydney.

We offer home care services for older people across the state of Victoria and NSW. We also provide Veterans' Home Care assessment and coordination services in Western Australia. Some of our services are free. For others we charge a fee based on the client's ability to pay.

We employ over 1,500 staff across Victoria and New South Wales. Our employees are engaged either by contract or under an award and/or industrial agreement.

LCHS has over 10,000 suppliers and we purchase goods and services locally where possible, or through public authorities and our supply chains are stable longer-term arrangements, transparent, and contained. LCHS has a broad range of suppliers and procures goods and services from the following supplier categories:

- Recruitment agencies
- Consulting and business management services
- Clinical and allied health services
- Medical supplies and consumables
- Cleaning services
- Contract labour
- Motor vehicles
- Office equipment goods and stationary
- IT equipment and software

Our major operational contracts are entered into on LCHS terms and conditions which includes a requirement that our suppliers comply with the requirements of the Act and notify us of any instances of modern slavery in their supply chains. To date we have not received any notifications identifying modern slavery practices from our suppliers.

LCHS continues to maintain a robust, contemporary and flexible risk management framework that supports future growth, a safe environment and compliance with relevant legislation, regulations and standards. This framework both promotes and is supported by a positive risk culture in which staff are able to identify and respond to emerging risks.

LCHS ensures effective risk management occurs by connecting the values and goals of the organisation with the practical risk management activities conducted by management and staff including modern slavery risks.

LCHS is holds full accreditation against the Quality Innovation Council (QIC) Health and Community Services Standards 7th edition. The QIC Standards support various health and community organisations to maximise continuous quality improvement opportunities by undertaking a 'whole-of-organisation' approach to assessment. Key areas of the QIC Standards support organisations in improving management systems, governance and service delivery.

All staff members at LCHS are responsible for identifying, reporting and responding to risks in a timely and effective manner. Our policies and procedures have recently been reviewed and updated and outline how current and emerging risks should be managed. We believe that LCHS has a positive risk culture where staff, volunteers and contractors fulfil their risk management responsibilities to help manage client, community, organisation and workforce risks.

LCHS encourages the disclosure of instances of suspected unethical, illegal, fraudulent or undesirable conduct involving LCHS and provides protection to persons who make a disclosure so that they may do so confidentially without fear of intimidation, disadvantage or reprisal. LCHS has a Whistleblower Policy that provides a process to raise potential risks to the organisation.



### 3. Risks of modern slavery practices in the entity's operations and supply chain of the reporting entity and any entities owned or controlled by the reporting entity

LCHS recognises that its use of contractors, procurement of goods and services, human resources practices and investments are a potential risk for modern slavery. LCHS is an Australian based organisation delivering services in a country identified as 'low' risk in The Global Slavery Index. However, we understand that we might be linked to a higher risks of modern slavery through our supply chains and as an organisation we are committed to respecting human rights, and do not tolerate exploitation of any kind.

In order to address any potential risks, LCHS ensures its contracts with suppliers communicate LCHS' position with regards to modern slavery through measured contractual obligations, and awareness-raising through our Code of Conduct which suppliers must sign. Other contract management procurement documentation, such as requests for quotes and tender responses include a commitment to identify and rectify modern slavery practices within the supply chain.

Health-related goods, services and equipment are procured through a state-based service which itself upholds the modern slavery position of prevention of exploitation in its procurement practices.

Our terms and conditions for engaging temporary workforce through labour hire companies have been updated, and we have confirmed due diligence has been conducted on our investment portfolio.

Our Code of Conduct and various governance, finance and human resource policies and procedures support appropriate reporting and subsequent action, should a concern be identified.

All contracts, policies, and internal procedures are reviewed on a periodic basis, with robust systems in place to ensure these reviews occur. LCHS staff, as far as possible continue to be alert in regards to identifying exploitation practices within our supply chains.

In relation to our staff, LCHS recognises that as an employer of over 1,500 people, it may cause, contribute, or be directly linked to modern slavery risks. However, we believe the risk with our workforce to be low, mostly in part due to the industrial regulations (awards, agreements, employment contracts) governing our workforce.

We conduct mandatory employment screening practices and verification of right to work in Australia for all employees. In recognition of the increased risk related to employment of over 1,500 people, during the Reporting Period LCHS has undergone a major restructure and now has two new directorates – People, Learning and Culture (PLC) and Digital Health both managed by appropriately skilled Executive Directors. This restructure builds on existing compliance mechanisms.

### 4. Actions taken to assess and address modern slavery risks, including due diligence and remediation processes

#### Supplier Questionnaire

LCHS engaged with a range of its high value and high use suppliers across multiple supplier sectors by requesting that they complete a modern slavery questionnaire in 2023. The purpose of the questionnaire was both as an education and review mechanism regarding supplier understanding and knowledge of modern slavery risks.

The responses received provided some insight into supplier operations, knowledge of and controls in place to address modern slavery. LCHS plan to repeat the supplier questionnaire every 3 years.

#### Notable findings from the responses include:

- most suppliers described their visibility over modern slavery as 'developing' (meaning that organisation has assessed risk with major tier one suppliers but have limited or no visibility of their supply chains below the tier one level);
- over half of the suppliers said they had policies and procedures in place to deal with modern slavery;



- there was an even balance between those organisations that had a dedicated person or team to tackle modern slavery and those who did not;
- the majority of suppliers have trained staff in how to identify, assess and respond to modern slavery risk; and
- over 90% of suppliers responded stating that they are not aware of low-skilled migrant workers working in their organisations supply chains. However, only half of those suppliers do any form of screening for modern slavery or other human rights harms that may occur.

## Training

LCHS launched a modern slavery training package in December 2022 to create an increased awareness amongst all LCHS staff about modern slavery risks. The training provides an introduction to the concepts and legal requirements on organisations to combat modern slavery. LCHS will build upon this introductory training in future years.

Our records demonstrate that 96.86% of staff have completed the training for this reporting year.

## Remediation

LCHS' remediation practices are at this stage informed by any reports made via our complaints and feedback links or the LCHS Whistleblower Policy. During this Reporting Period, we have not received any notification or concerns regarding modern slavery risk within our operations.

## 5. How the entity assesses the effectiveness of its actions

During the Reporting Period, LCHS has continued to monitor and implement actions to review the likelihood of modern slavery in our operations. LCHS recognises that the review and assessment of our actions to identify and address modern slavery risks is an evolving process and that each year we build upon previous years' actions. During the previous Reporting Period we introduced reportable measures such as completion of staff training and a modern slavery questionnaire for our suppliers.

This year we have created an independent operational risk on our enterprise risk register to ensure robust mitigation and monitoring. The risk name is Modern Slavery Compliance and Mitigation. This risk is overseen by an internal panel of relevant subject matter experts and allows LCHS to robustly monitor and mitigate the risk of failing to identify, prevent, or mitigate modern slavery practices within our operations and supply chains.

With the establishment of the PLC and Digital Health directorates LCHS has a strong future focus on compliance. We are in the process of reviewing our Enterprise Resource Planning (ERP) system and will be implementing a new ERP during the coming reporting period which will include a robust contract management module.

LCHS like many organisations we deal with, particularly those who do not meet the reporting threshold nor voluntarily submit a modern slavery statement, we assess their compliance and consequently our own compliance as still at an awareness level. We are committed to attaining a higher level of assessment including via detection, investigation and remediation processes. We intend to do so by working with health and community sector partners to raise awareness and share in resourcing and knowledge in order to effect a more impactful change to combatting modern slavery practices.

This Modern Slavery Statement is made in accordance with section 14 of the Act and represents the activities undertaken by LCHS during the Reporting Period.

Approved 28 November 2024 by the LCHS Board.

Approved and signed by Stelvio Vido Chairperson