

Modern Slavery Statement

1 July 2021 - 30 June 2022

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 2021 to 30 June 2022 (**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 includes a commitment to combatting modern slavery practices.

LCHS controls the following entities Latrobe CHS Nominees Pty Ltd ACN 637 963 814, Link Health and Community Limited ACN 136 877 702, and Link Private Practice Pty Ltd ACN 621 922 861. Latrobe CHS Nominees Pty Ltd does not conduct any operational activities. LCHS acquired Link Health and Community Limited and Link Private Practice Pty Ltd on 1 July 2020. Link Health and Community Limited ACN 136 877 702 did not conduct any operational activities during the Reporting Period. Link Private Practice Pty Ltd ACN 621 922 861 was deregistered on 29 August 2021.

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

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 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. We also provide Veterans' Home Care assessment and coordination services in Western Australia.

We are particularly committed to helping the people who need us most, especially those with several health problems and high support needs. Some of our services are free. For others we charge a fee based on the client's ability to pay.

We employ over 1,400 staff across Victoria and New South Wales.

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

Our major operational agreements 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 of modern slavery from our suppliers.

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 the use of contractors, procurement of goods and services, human resources practices and investments as having a potential risk of being exposed to modern slavery. However, the potential for modern slavery to occur within our direct operations is a low risk. As an organisation we are committed to respecting human rights, and do not tolerate exploitation of any kind.

We purchase goods and services locally where possible, or through public authorities and our supply chains are stable longer-term arrangements, transparent, and contained.

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 though our Code of Conduct covering our suppliers. Other contract management procurement documentation, such as requests for quotes and tender responses include the commitment on identifying and rectifying 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 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.

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

During the Reporting Period, LCHS undertook a review of our top 100 suppliers based on annual spend, to assess the risks of modern slavery based on our suppliers own published Modern Slavery Statements. LCHS acknowledges that our suppliers who are required to comply with the Act are limited, due to the fact that the majority of our suppliers are locally owned small business who do not reach the reporting threshold of \$100M in consolidated revenue.

On reviewing our supplier's Modern Slavery Statements LCHS did not identify any significant or high risk modern slavery practices in our supplier's operations. The supplier's Modern Slavery Statements demonstrated a high level of engagement in the identification of modern slavery risks.

LCHS has adopted a Modern Slavery Training package that will be required for staff as part of their mandatory training in the next Reporting Period.

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 considers that its actions are effective in the current environment and LCHS will continue to remain vigilant to the risks including by extending training to all staff so that our workforce is appraised of the potential risks of modern slavery in our operations.

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.

think of walker

Approved 24 November 2022 by the LCHS Board.

Approved and signed by Judith Walker, LCHS Board Chairperson