

## PENINSULA HEALTH – MODERN SLAVERY STATEMENT

### Introduction

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

### Reporting Criterion 1: identify the reporting entity

Peninsula Health is the major public health service established under section 181 of the Health Services Act 1988 (Vic) for Frankston and Mornington Peninsula.

### Reporting Criterion 2: describe the reporting entity's structure, operations, and supply chains

#### Structure

- Peninsula Health (PH) is registered as a State Government statutory authority.
- Located in Australia
- Address: 2 Hastings Rd, Frankston VIC 3199
- ABN: 52 892 860 159
- Number of employees: 6300+ staff & 700+ volunteers
- PH consists of five major hospitals: Frankston Hospital, Frankston Public Surgical Centre, Rosebud Hospital, Golf Links Road Rehabilitation Centre, and the Mornington Centre; five community mental health facilities; and five community health centres in Frankston, Mornington, Rosebud, Hastings and Carrum Downs and MePACS.
- Link to Annual Report: [PH027 2023 Annual Report.indd](#)

#### Operations

- Services provided by PH for the community include care across the life continuum for obstetrics, paediatrics, emergency medicine, intensive care, critical care, surgical and general medicine, rehabilitation, and oncology, through to aged care and palliative care. PH also provides extensive services in community health, health education and promotion, ambulatory care, and mental health. PH is a major teaching and research health facility, training the next generation of doctors, nurses, allied health professionals and support staff.
- PH is located in Metropolitan Melbourne covering the local government areas of Frankston, Mornington Peninsula and parts of the City of Kingston. The catchment extends from the bayside areas bordered by Carrum in the north, Langwarrin and Hastings to the east, and down to Portsea and Flinders in the south.
- PH has strong partnerships with Monash University, Deakin University, La Trobe University, Chisholm Institute and Holmesglen Institute.

#### Supply chain

- Health Share Victoria (HSV) (previously known as Health Purchasing Victoria) is an independent statutory authority under subsection 129(1) of the Health Services Act 1988 (Vic) established in 2001 to improve collective purchasing power of Victorian public health services and hospitals. As a legislated entity HSV has the authority to establish contracts on behalf of all Victorian public health services and Peninsula Health is mandated to purchase from the contracts established by HSV.

- 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.
- PH, through legislation, is mandated to purchase the goods and services it needs from the suppliers who are party to HSV collective agreements. As such, it is recognised that HSV has a significant role in health service supply chains.
- HSV works with approximately 449 tier-one suppliers and is responsible for more than 65 contracts with a spend value of over \$1.16 billion.
- HSV contracts cover a broad range of services, equipment and supplies across a number of categories including 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://www.hsv.org.au/contracts-and-documents/contracts>.

#### Reporting Criterion 3: describe risks of modern slavery practices in operations & supply chains

- PH, as a public health service, remains committed to ensuring it does not cause or contribute to modern slavery practices. We recognize, however, that our global supply chains, especially in high-risk geographical areas, may expose us to potential modern slavery risks.
- In the previous reporting period, PH advanced its commitment to identifying and addressing these risks. While previously hindered by the COVID-19 pandemic, we have since strengthened our capacity to conduct detailed supplier risk assessments and risk mitigation activities.
- HSV has continued to assess general modern slavery risks within health service supply chains, utilizing academic research and international as well as domestic reports. Through this analysis, we understand that due to the wide array of products and services sourced by HSV and their associated geographic, industrial, and regulatory complexities, PH may be exposed to specific modern slavery risks.
- PH has made progress in assessing its supply chain for modern slavery risk, using HSV's Modern Slavery Risk Assessment Template to evaluate the risk profiles of our suppliers. This step marks our commitment to better understand and mitigate modern slavery risks within our operations and supply chains.

#### Reporting Criterion 4: describe the actions taken to assess and address risks of modern slavery

##### Policy

- PH has developed a Modern Slavery Policy which has been approved by Executive Committee and is effective as of February 2023.

##### Due Diligence

- A modern slavery questionnaire has been incorporated in to the market release tender documents.
- This questionnaire will be used for all relevant tender categories and suppliers.

##### Contracts

- A modern slavery clause (provided below) has been incorporated in to PH's Commercial agreement template.
  - The Contractor must take reasonable steps to identify, assess and address risks of Modern Slavery practices in the operations and supply chains used in the provision of the Services.
  - If at any time the Contractor becomes aware of Modern Slavery practices in the operations and supply chains used in the performance of the Agreement, the Contractor must as soon as reasonably practicable take action to remove these practices from the operations and supply chains.

- If requested by the Health Service, with at least twenty 20 Business Days' notice, the Contractor must respond to any reasonable requests for information (including any supplier survey) provided by the Health Service relating to its compliance under this clause,
- Where:
  - either the Contractor or the Health Service has identified:
  - significant or persistent Modern Slavery risks, or
  - alleged Modern Slavery practice(s),

in the operations and supply chains used in the performance of the Agreement; and

- the Health Service has made reasonable efforts to engage the Contractor to take action to mitigate the risks or to remove the practice(s); and
- the Contractor fails to take action to mitigate those risks or remove those practice(s)

the Health Service reserves the right to terminate this Agreement in accordance with clause 21.3.6 which:

*21.3.6 directors, officers, staff or sub-contractors of the Contractor commit any offence or do any act or fail to do any act which in the reasonable opinion of the Health Service is of such a nature as to be likely to harm the Health Service's reputation or affect the capacity of the Contractor to discharge its obligations under this Agreement*

#### Training

- During FY2022-23, all sourcing staff have successfully completed the HSV's Modern Slavery training, strengthening their awareness and capacity to identify and address Modern Slavery risks within our procurement activities.

#### Risk Assessment

##### **2022-23 Action**

##### Risk Assessment Methodology

- PH utilised the risk assessment template provided by HSV to obtain information from suppliers regarding their supply chain and modern slavery mitigation practices.
- The Risk Assessment Questionnaire consists of the following:
  - Company Details – 10 Questions
  - Modern Slavery Policy – 8 Questions
  - Modern Slavery Due Diligence – 14 Questions
  - Modern Slavery Training – 6 Questions
  - Modern Slavery Remedy – 6 Questions
- The scores for these questions are designed to attract low score for responses conducive to mitigating modern slavery risks and a high score for responses that indicate that suppliers are yet to plan and undertake any actions to mitigate the said risks.
- To be clear, a low score means low risk and a high score means high risk.
- The questionnaire issued by PH can attract the best score of 15 and the worst score of 175. Using this scoring methodology, a score in the range of 15-70 is considered low risk, 71-120 is considered medium risk and 121-175 is considered high risk.
- Low Risk = No action required
- Medium Risk = Monitor commitment to improve where stated
- High Risk = Collaborate with supplier to develop and implement modern slavery risk mitigation plan

##### Supplier Assessment

- PH issued the risk assessment questionnaire to 29 suppliers making up top 60% of our expenditure. In our previous statement we committed to assessing top 20 suppliers, however, our latest analysis showed that 29 suppliers now make up 60% of our expenditure. As such we extended our first phase assessment from 20 to 29 suppliers.
- Out of the 29 suppliers, 19 suppliers responded providing PH with a 66% response rate.
- 18 suppliers who responded received a score between 15 and 68, placing them in the low risk category. No further follow up actions required for these suppliers.
- 1 supplier received a score of 74, which places them in medium risk category. This supplier scored high (medium-high risk) in 4 due diligence questions. They have plans to address these gaps within next 2 years.
- No suppliers assessed were deemed to be in the high risk category.

#### **2023-24 Plan**

- PH will endeavour to obtain a response to the risk assessment questionnaire from the suppliers in the top 60% spend who did not respond in the 2022-23 survey.
- Further PH will target the suppliers in the next 20% of expenditure, covering an overall 80% expenditure over the two year period.
- PH will also analyse high risk categories and target the top 2 high risk categories to conduct the risk assessment in 2023-24. The suppliers in these categories who have not already submitted a response to the risk assessment questionnaire in the previous year will be requested to submit a response.

#### **2023-24 Action**

- PH issued a risk assessment questionnaire to the 10 suppliers who did not respond during the 2022-23 risk assessment process. Unfortunately, these 10 suppliers again did not respond.
- PH provided the names of these 10 suppliers to HSV to obtain their risk assessment ratings. HSV had assessed 4 of these suppliers, classifying them in the medium-risk category.
- PH did not complete the planned assessment of suppliers within the next 20% expenditure tier. This assessment will be undertaken in collaboration with HSV in the next financial year, as HSV expects to have assessed a broader range of suppliers by that time.
- PH sought HSV's support in assessing two high-risk categories: Personal Protective Equipment (PPE) and Security. In the PPE category, PH purchases from 5 suppliers: 3 suppliers are rated medium risk, 1 supplier is rated low risk, and 1 supplier has not yet been assessed. In the Security category, PH contracts with 1 supplier, rated medium risk.
- From the risk assessments conducted in 2023-24, no suppliers were deemed high risk.

#### **2024-25 Plan**

- **Expand Supplier Risk Assessment Coverage:** In collaboration with HSV, PH will complete the assessment of suppliers within the next 20% expenditure tier, leveraging HSV's broader supplier risk evaluations for greater accuracy and impact.
- **Enhance Engagement with Non-Responsive Suppliers:** PH will implement targeted engagement strategies to encourage participation from non-responsive suppliers, including follow-up communications and clarifying the importance of their risk assessment responses for compliance and ethical sourcing.
- **Strengthen Oversight in High-Risk Categories:** PH will continue to closely monitor high-risk categories, particularly Cleaning and Hospitality. High Risk Categories in the clinical space will be identified and reviewed.

- **Collaborate on Comprehensive Training and Awareness Programs:** Building on previous training efforts, PH will work with HSV to impart training and new resources for key stakeholder departments such as Engineering, Facilities, Information Technology and Pharmacy, emphasizing practical steps to identify and mitigate modern slavery risks within the procurement process. These actions aim to deepen engagement, expand risk visibility, and strengthen ethical practices in the supply chain.

#### Reporting Criterion 5: describe how the reporting entity assesses effectiveness of actions

- PH continues to prioritise the assessment of modern slavery risk within our supply chain, building on the commitment made in FY 2022-23 to introduce robust risk assessment mechanism.
- As a result of the actions undertaken in 2022-23 and 2023-24, PH has gained a deeper understanding of modern slavery risk profile of 23 suppliers who make up 55% of expenditure. Further, suppliers in two high risk categories were evaluated. These assessments have indicated a generally low- medium risk profile across this supplier group, providing a foundation for future monitoring.
- The introduction of our Modern Slavery Policy, the inclusion of modern slavery terms in tender documents and contracts, and comprehensive staff training are key actions that demonstrate PH's commitment to mitigating modern slavery risks. These initiatives maintain a clear, focused approach across all areas, reflecting our progress and continued dedication to addressing modern slavery within our supply chain.

#### Reporting Criterion 6: describe the process of consultation with related entities

Peninsula Health does not own or control any other entities.

#### Reporting Criterion 7: provide any other relevant information

- **Closing statement**  
Peninsula Health is confident that the actions taken this year is building the strong foundation necessary for an effective modern slavery framework. We recognise there is more work ahead, and PH is committed to continuously enhancing our approach, collaborating with our stakeholders and contributing to the global effort to eradicate modern slavery.

#### Approval

This statement was approved by the Board of Peninsula Health in their capacity as principal governing body of Peninsula Health on 3 December 2024.

This statement is signed by Helen Cooper in her role as the Chief Executive Officer of Peninsula Health 3 December 2024.



Sign: Helen Cooper. Chief Executive 3 December 2024