

Dental Health Services Victoria Modern Slavery Statement

Reporting Criterion 1: identify the reporting entity

This Modern Slavery Statement is made pursuant to the Commonwealth Modern Slavery Act 2018 (the Act) by Dental Health Services Victoria (DHSV) and relates to the financial year 1 July 2021 to 30 June 2022.

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

Structure

DHSV is a health service established under section 181 of the Health Services Act 1988 (Vic).

DHSV is the lead oral health agency in Victoria. DHSV provides public oral health services through The Royal Dental Hospital of Melbourne (RDHM), ABN 55 264 981 997, which is located at 720 Swanston Street Carlton, and in partnership with over 50 community dental agencies throughout Victoria.

As at 30 June 2022 the combined RDHM & DHSV full-time employee count is 398. The gender split is approximately 73% female and 27% male.

DHSV does not own or control any other entities.

DHSV's Annual Reports are found at:

<https://www.dhsv.org.au/about-us/our-organisation/reports-and-publications>

Operations

DHSV provides public oral health services through RDHM and in partnership with over 50 community dental agencies throughout Victoria.

DHSV runs state-wide oral health promotion programs, invests in oral health research, advises the government on oral health policy, and supports the education of future oral health professionals.

The RDHM is Victoria's leading dental teaching facility, working in partnership with The University of Melbourne, RMIT University and La Trobe University in the education of dental and oral health professionals.

Supply Chain

DHSV, listed under Schedule 5 (Public Health Services) of the Health Service Act 1998 (the Act) is mandated to use HealthShare Victoria collective purchasing agreements where they cover the required goods or service, and is also required to comply with HSV's Health Purchasing Policies.

Where DHSV is unable to procure goods, services or assets from a HSV or Victorian Government Purchasing Board (VGPB) purchasing agreement, DHSV will directly approach the supply market. All procurements are conducted in accordance with DHSV's Procurement Framework (PF) which includes the requirement for DHSV to comply with additional Victorian Government procurement instruments, including:

- The Ministerial Directions and Instructions for Public Construction in Victoria

- Local Jobs First policy
- Uniforms and Personal Protective Equipment (PPE) Policy; and
- Standard Motor Vehicle Policy.

DHSV also utilise government pre-qualification registers such as the Construction Register which is approved by the Secretary to the Department of Treasury and Finance, and the Uniforms and Personal Protective Equipment Ethical Supplier Register which is administered by the VGPB.

Noting a material percentage of DHSV's procurements are governed by a Victorian Government procurement policy, instruction or instrument.

DHSV's procurement's cover a broad range of services, equipment, and supplies. Below are examples of procurements where DHSV directly approached the market during the reporting period.

Solution Architecture Services for Vendor Neutral Archive

- Forms part of the School Dental Program I.T. solution. Covers the design, build, validation and testing of the Mobile Diagnostic Imaging Management Solution.

Courier Services

- Daily consignments of dental consumables are prepared for despatch at DHSV's central warehouse located in Carlton Victoria.
- This procurement secures a third-party courier service provider to deliver consignments of dental consumables to Victorian Public Dental Agencies across Victoria.

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

Modern slavery in DHSV's supply chains

DHSV recognises that the extensive nature of its global supply chains may expose DHSV to modern slavery risks. Some of the general risk areas present in DHSV's extended supply chain include:

- labour practices in offshore manufacturing facilities, some of which are located in South-East Asia
- labour practices in the sourcing of raw materials, including cotton and rubber; and
- industry risks associated with textiles, electronics and cleaning services

Furthermore, DHSV's understanding of general health sector modern slavery risks include:

- medical goods, surgical equipment and medical suppliers present the highest risk
- lower tier supply chains in countries with less human rights regulation often involve hazardous working conditions, labour exploitation, child labour and other abuses;
- forced labour is high risk in glove manufacturing supply chains across Malaysia, Thailand and Sri Lanka; and
- child labour is prevalent in supply chains of surgical equipment such as scissors, scalpels and forceps which mostly occur in Pakistan

DHSV's Risk Assessment Approach

DHSV upholds the Australian Government's position on modern slavery – there is no place for modern slavery in the Australian community or in the global supply chains of Australian goods and services. DHSV recognises that it has not caused or contributed to modern slavery practices, but rather, DHSV is linked to risks which exist offshore and in high-risk geographies.

DHSV's modern slavery risk assessment approach mirrors the guidance provided by HSV. DHSV's risk assessment approach incorporates the four (4) modern slavery risk factors which are each scored using a sliding scale represented by a one (1) for low risk to three (3) representing high risk. The total score represents the supplier's risk rating.

The risk rating scale is represented as Low, Medium or High each signifying a different approach/action. The approach/actions may include incorporating modern slavery clauses in the contract or the supplier completes an annual questionnaire as part of an ongoing performance review.

DHSV applies the Modern Slavery Act requirements to procurements with an estimated value of \$3,000,000 (including GST), and above. The risk assessment will be undertaken by the procurement's Category Manager and Procurement Team member. Contract management is undertaken by the Contract Manager which in DHSV's context is assumed by the procurement's Category Manager.

HSV contracted suppliers in DHSV's supply chain

During the third reporting period of the Modern Slavery Act the risk mitigation actions and support provided by HSV, includes: -

- Modern slavery risk assessment: which included assessment of 200 suppliers under Collective Purchasing Agreements, provided DHSV with an Individual Modern Slavery Risk Assessment Report, and HSV requested consent from suppliers to share their risk categorisation with health services;
- Modern slavery risk mitigation: where HSV wrote to all very-high and high risk suppliers providing suppliers with tools and resources to develop/enhance modern slavery risk management systems, and HSV outlined to suppliers their contractual obligation under the Victorian Government Supplier Code of Conduct to respond to modern slavery risk in their operations and supply chain; and
- Supported health services through monthly modern slavery community of learning sessions and the provision of a suite of tools, resources and guidance material.

Operations

DHSV undertook a risk assessment of modern slavery risks in our operations over the reporting period. Following this assessment by the People and Culture team DHSV was found to demonstrate a commitment to the health, safety, and wellbeing of our workforce. As a health service with a largely skilled workforce, DHSV considers the risk of modern slavery within its direct business operations to be relatively low. Our policies, procedures and practices provide a framework to support and protect our workforce and mitigate risks associated with modern slavery. DHSV's Code of Conduct Framework, Public Interest Disclosure Procedure and suite of Health and Safety Procedures uphold the expected behaviours and actions for all DHSV employees. Additionally, all DHSV employees have a contract of employment and are governed by an Enterprise Agreement which stipulates the minimum terms and conditions of employment. Furthermore, we ensure a merit-based recruitment and selection process, whereby only candidates with the required level of experience and qualifications are recommended for suitability to a vacant position. Finally, DHSV engages with recruitment agencies as part of the Victorian Government Staffing Services Contract.

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

Policy

DHSV have implemented a modern slavery framework which includes amendments to the DHSV Procurement Framework and Invitation to Supply suite of documents and the creation of a modern slavery risk assessment tool. This framework establishes DHSV's processes in respect to modern slavery and human trafficking concerns, and provides DHSV staff with a toolkit when assessing and addressing modern slavery risks.

Due diligence

The focus of the third reporting period under the Modern Slavery Act 2018 (Cth) was for HSV, on behalf of Health Entities, to undertake supplier risk assessments within HSV Collective Purchasing Agreements and for DHSV to assess modern slavery risks in DHSV's operations.

Contracts

DHSV applies the Modern Slavery Act requirements to procurements with an estimated value of \$3,000,000 (including GST), and above. In the third reporting period DHSV did not execute contracts where the value threshold was reached.

Training

In the third reporting period DHSV continued to inform itself through the following actions:

- a procurement team member attended HSV Modern Slavery Community of Learning sessions
- a procurement team member reviews all guidance material issued by HSV
- a procurement team member provides advice, guidance, and support to DHSV Category Managers
- procurement eLearn modules are implemented and completed by applicable staff members.

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

During this reporting period, DHSV assessed modern slavery risks in DHSV's operations, continued to self-inform by participating in HSV's Modern Slavery Community of Learning, reviewed HSV guiding material and kept abreast of HSV's risk mitigation actions.

At this stage, we are unable to adequately assess the effectiveness of measures undertaken thus far.

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


Not applicable

Reporting Criterion 7: provide any other relevant information

DHSV is committed to:

- enforcing effective systems and controls to reduce the risk of modern slavery
- ensuring there is transparency in its operations and approach to addressing modern slavery
- fostering open and transparent supplier relationships which encourages modern slavery reporting and meaningful change through remediation; and
- applying a continuous improvement approach to how it reports on the risk of modern slavery practices within our operations and supply chains

This statement covers 31 July 2021 to 30 June 2022 and has been approved by the Board of Dental Health Services Victoria at the Board meeting held on 24 November 2022.



Date: 24 November 2022

Signed on behalf of DHSV Board

by David Stevenson - Chairman