

Latrobe Health Services and subsidiary company

# Modern Slavery Statement

Financial year 22-23





#### Introduction

The Modern Slavery Statement is made pursuant to the Commonwealth Modern Slavery Act 2018 (the Act) by Latrobe Health Services and on behalf of its subsidiary, Maryvale Private Hospital and relates to the financial year 2022 – 2023.

#### The reporting entity

This statement is made by Latrobe Health Services ABN 94137187010 and on behalf of its subsidiary, Maryvale Private Hospital ABN 44007374629.



# Structure, Operations & Supply Chains

#### Latrobe Health Service's structure, operations, and supply chains

#### **Our Structure**

Latrobe Health Services (Latrobe Health) is an Australian-owned not-for-profit registered private health insurer with more than 90,000 members across Australia. Latrobe Health is a regionally focused and based private health insurer that exists to benefit and support its members and the communities in which they live.

In 1991 we established Maryvale Private Hospital (Maryvale), Gippsland's only private not-for-profit acute medical and surgical hospital. Since its inception, Maryvale has cared for more than 60,000 patients in the Gippsland region. Today, it's a key health hub contributing to education and clinical programs through medical, surgery and consulting services. Our commitment to the regions also includes support for community medical clinics and sponsorship of programs aimed at improving access to health services for rural and regional communities.

#### **Our Operations**

Latrobe Health provides quality, affordable private health insurance covering more than 90,000 Australians. As a member-owned fund, we provide:

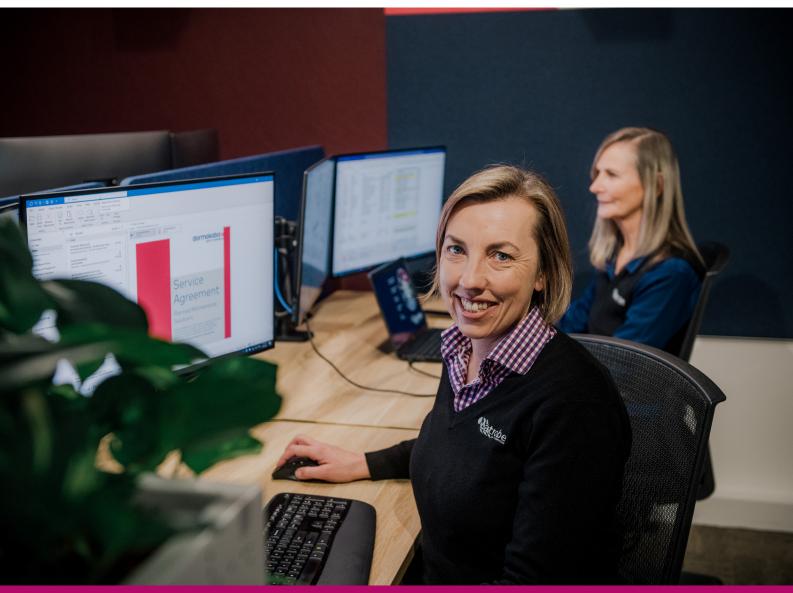
- Value for money products hospital and extras covers to suit all circumstances at an affordable price;
- Higher benefits around 90c in every dollar we receive is used to pay our members' claims:
- Great service we care about you and your health and will do what it takes to give you the best member experience possible.

Maryvale is a 65-bed hospital providing a comprehensive range of medical, surgical and consulting services. Our comprehensive services include weight-loss surgery, orthopaedic surgery, general surgery, ear, nose and throat surgery, gynaecological surgery, dental surgery and acute medical care. We have a variety of specialist physicians who consult and admit general and sub-specialty medicine patients for ongoing care of their acute and chronic medical conditions. We also provide outpatient consulting services which support our Surgical, Medical and Sub-Specialty Specialists.

#### Our supply chain

Latrobe Health – As a service-based business, majority of our supply chain comprises of services. This includes project management, marketing, technology and professional services. Smaller spend includes corporate and facilities, contractors and telecommunications.

Maryvale - As a not-for-profit acute private hospital, they procure medical-related items which include but not limited to: medical consumable products, medical equipment (including maintenance), pharmaceuticals, food and nutrition, linen services, utilities, agency labour, pathology and radiology services, pharmaceuticals, personal protective equipment, textiles, travel, consultancy services, facility management including security, information & communication technology (ICT) and advertising/marketing.



# Risks & Actions

#### Risks of modern slavery practices in operations and supply chains

Latrobe Health recognises the importance of this activity and have conducted a risk assessment in the FY2022-23 reporting period.

We recognise that the extensive nature of our global supply chains may expose us to modern slavery risks. Latrobe Health has scoped the general modern slavery risks by drawing on academic research, international and domestic reports, and analysis.

Whilst Latrobe Health has a fairly straight forward supply chain, Maryvale may have a potential to be exposed to a number of modern slavery risks due to the diversity of products and services. These potential risks are due to associated geographic locations, industries, and regulatory systems further down those supply chains.

Some of the potential general risks identified in Maryvale supply chain includes:

- Labour practices in offshore manufacturing facilities, some of which are located in Southeast Asia;
- Labour practices in sourcing of raw materials, including rubber and cotton; and
- Industry risks associated with textiles, electronics and cleaning services.

In addition, we have identified the following potential high-risk areas specific to healthcare:

- Surgical and examination gloves;
- Surgical instruments; and
- Linens and gowns.

Given the complexity in such extensive supply chains, we will work on a risk assessment methodology to improve the visibility of high-risk areas within the hospital supply chain.





#### Actions taken to assess and address risks of modern slavery

Latrobe Health has been impacted by the change of key management staff the last couple of years. This has resulted in reduced capacity to undertake actions to access and address modern slavery risks in our operations and supply chains.

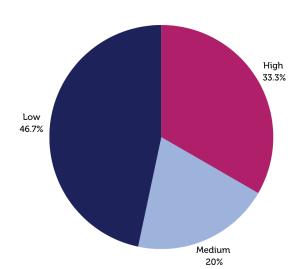
Over this reporting period, we have made significant progress in the implementation of our modern slavery policy and actions to assist in addressing the modern slavery risks associated with our operations and supply chains. These include:

- Modern Slavery Training for staff with procurement responsibilities
- Risk Assessment of our supply chain.

#### Response rate and supplier risk rating

Latrobe Health and Maryvale have performed a risk assessment based on 75% of spend data. This analysis identified 111 suppliers. These suppliers were invited to complete a Modern Slavery Supplier Questionnaire with a response rate of 13.5%.

The table below shows the assessment outcomes for suppliers, outlining the risk categories in which the suppliers fall.



Risk rating	No. of Suppliers
High	5
Medium	3
Low	7

The assessment identified 5 high and 3 medium risks suppliers within the Latrobe Health's and Maryvale's supply chain due to the nature of the products or services they supply, or locations they supplier may operate from. It should be noted that these results do not imply Latrobe Health and/or Maryvale has caused or contributed to modern slavery practices, but rather, we are linked to potential risks which exist offshore and in high-risk geographies.

#### Actions taken to assess and address risks of modern slavery

The focus during this reporting period under the Act was to undertake supplier risk assessments within Latrobe Health and Maryvale's spend to gain better understanding of our exposure and gain insights into our potential supply chain risks.

Our questionnaire focused on four sub sections that are covered in the Modern Slavery Act, being policy, due diligence, remedy, and training. Insights gained are summarised below for each of the indicators.

#### **Policy**

This section reviews the policy and procedures suppliers have in place when encountering modern slavery issues. The intent was to see how many suppliers had a policy.

Insights gained:

• 73% of suppliers had a formal policy in place.

### Due diligence

This section reviews what the suppliers is doing to mitigate modern slavery risks Insights gained:

- 44% of suppliers have a role within their organisation that is responsible for identifying and overseeing modern slavery risks in relation to the goods and services they provide.
- 13% of our suppliers are aware of low skilled migrant workers within their supplier
  - chain, but have mitigation in place to ensure the Act is not breached.
- 67% of our suppliers perform screening of all prospective suppliers to assess the risks
  - of modern slavery or other human rights harms that may occur in its operations and
  - supply chains.
- 40% of our suppliers engage in any other due diligence activities to identify, prevent
  - and mitigate risks specific to modern slavery in its operations and supply chains.

Latrobe Health and Maryvale have updated their supplier registration forms to inform new suppliers they will only engage with suppliers that are compliant with the act.



#### **Training**

This section reviews suppliers that provide training to their staff.

Insights gained:

• 67% of suppliers provide training to their staff to identify, assess and respond to modern slavery risks.

All key staff of Latrobe Health and Maryvale have attended a nationally accredited modern slavery course.

#### Remedy

This section reviews processes on how the supplier responds to allegations of modern slavery.

Insights gained:

• 64% of suppliers have plans to respond to allegations of Modern Slavery.

Latrobe Health and Maryvale intends to continue collaborating with our suppliers to address these risks.

#### Assesses effectiveness of actions

We recognise that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon. To this end, we set ourselves annual goals to reach so we can look back and assess the effectiveness of our approach and inform our path forward. This includes a more detailed risk assessment of our supply chains in FY2023-24 with increased participation from our suppliers.

#### Process of consultation with related entities

During the reporting period this statement covers, we have actively engaged and consulted with our subsidiary (Maryvale) in the development of this statement. We discussed details of the Modern Slavery Act 2018's reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

#### **Closing statement**

Latrobe Health is confident that steps taken this year have built a strong foundation for a robust modern slavery framework. We recognise there is more to do and we are committed to continually improve our approach and partnering with our subsidiary, Maryvale Private Hospital, and stakeholders to work towards the eradication of modern slavery.



Ormond Pearson

Board Chair of Latrobe Health Services
30 November 2023



#### **MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE**

#### **Principal Governing Body Approval**

	I his modern slavery statement was approved by the <i>principal governing body</i> of
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Latrobe Health Services
as defined by the *Modern Slavery Act 2018* (Cth)¹ ("the Act") on 11/30/2023

#### Signature of Responsible Member

This modern slavery statement is signed by a responsible member of

Latrobe Health Services Board

as defined by the Act2:

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**Ormond Pearson** 

Chair

#### **Mandatory criteria**

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Ma	ndatory criteria	Page number/s
a)	Identify the reporting entity.	1
b)	Describe the reporting entity's structure, operations and supply chains.	1
c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	2
d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	2
e)	Describe how the reporting entity assesses the effectiveness of these actions.	4
f)	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	4
g)	Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	4

<sup>\*</sup> If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

<sup>\*\*</sup> You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

<sup>1.</sup> Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

<sup>2.</sup> Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trust ee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.





## Keep in touch

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