

## **Goulburn Valley Health Modern Slavery Statement – Financial Year Ending 30 June 2025**

Modern slavery is a term used to describe serious exploitation of people in a manner likened to slavery. Modern slavery can occur in every industry and sector and has severe consequences for victims. Modern slavery also distorts global markets, undercuts responsible business and can pose significant legal and reputational risks.

Goulburn Valley (GV) Health recognises the importance of combating modern slavery, a crime that affects communities and individuals across the globe.

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (**the Act**) by GV Health and relates to the financial year 1 July 2024 to 30 June 2025 (**Reporting Period**).

### ***Mandatory Criteria 1 and 2: Identify the reporting entity (16(1)(a)) and describe its structure, operations and supply chains (16(1)(b)).***

GV Health is a Public Health Service established under section 65P of the *Health Services Act 1988* (Vic) with main campuses located at Shepparton, Tatura, Euroa and Rushworth. The main campus in Shepparton is the major acute referral hospital for the Hume region comprising a 300-bed acute and extended care facility which provides surgical, medical, paediatric, obstetrics and gynaecology, intensive care and psychiatry services as well as extended care regional and community care services.

GV Health employs more than 3,000 staff and provides care to a catchment population of around 150,000 people.

GV Health does not own or control any other entities. GV Health has government-mandated relationships with other public health services and public hospitals in the Hume region of Victoria including the Hume Local Health Service Network (supporting collaborative delivery of health care) and the Hume Rural Health Alliance (for procurement of information communication and technology services).

GV Health culture includes its CREATE values and behaviours: Compassion, Respect, Excellence, Accountability, Teamwork, Ethical Behaviour. Through these values, the organisation commits to delivering ongoing quality healthcare for our community. The CREATE values and behaviours are the foundations for our five strategic pillars and for achieving our goals



GV Health's delivery of healthcare services is supported by a wide range of local and occasional international contracts with approximately 1,845 suppliers. Products and services acquired by GV Health include:

- clinical products and equipment
- personal protective equipment (PPE)
- linen
- consultancy services
- trades and construction services
- locum health practitioners.

Of these, 368 suppliers form the top 20% dollar value contracts, with 30 contracts valued at more than \$1m.

### **Health Share Victoria**

A significant proportion of GV Health's procurement activity occurs under HSV collective agreements. HSV is a Victorian government entity established in 2001 under the *Health Services Act 1988* (Vic) and has a responsibility to facilitate reform of procurement systems for Victorian hospitals and health services.

HSV is a stakeholder organisation of the Victorian Department of Health, accountable to the Victorian Minister for Health. HSV partners with Victoria’s public health services to understand their requirements, facilitate large scale collective tenders, and, in collaboration with suppliers, to deliver enhanced health outcomes for all Victorians. GV Health procures goods and services from suppliers who are party to HSV collective agreements and hence HSV has a significant role in health service supply chains.

HSV has 66 contracts with a spend value of over \$1.6 billion. HSV contracts cover a broad range of services, equipment and supplies including ventilators, beds, mattresses, patient trolleys, treatment chairs, hypodermic needles and syringes, gloves, pharmaceutical products, catering supplies, non-and emergency patient transport. A full list of HSV sourcing categories can be found at <https://healthsharevic.org.au/contracts-and-documents/contracts>.

**Mandatory Criteria 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls - (16(1)(c))**

As a health service with a largely skilled workforce, GV Health considers the risk of modern slavery within its direct business operations to be relatively low. In line with a risk-based approach, GV Health acknowledges that modern slavery risk is likely to exist in our supply chains and operations.

GV Health’s supply chain has the potential to contain the following risks of modern slavery (inclusive of HSV foci):

- Labour practices in offshore manufacturing facilities, (such as facilities located in South-East Asia, South Americas);
- Labour practices in the sourcing of raw materials, including cotton and rubber;
- Industry risks associated with textiles, electronics and IT, and cleaning services:
- Surgical and examination gloves;
- Surgical instruments and equipment; and
- Linens, gowns, and common protective devices and clothing.

Risks associated with procurement facilitated by HSV

HSV has conducted a supplier risk assessment on behalf of Victorian public health services for the Reporting Period. The assessment covered 174 HSV suppliers who supply products or services to GV Health.

The risk assessment was split into two sections:

- a) Supplier details - questions regarding organisational structure, manufacturing location/s, industry sector, etc. These address criteria one, two and three under the Act (see point 2.1 above). The responses in this section attract a twenty per cent (20%) weighting to the overall risk rating of the supplier.
- b) Modern slavery risks - questions which focus specifically on the supplier’s response to modern slavery risks, actions taken, etc. These questions address criteria four and five under the Act and account for a weighting of eighty per cent (80%) of the overall risk rating of the supplier.

Key findings of the risk assessment:

- Supplier - manufacturing locations

Suppliers were asked which country they have manufacturing facilities. For purposes of the HSV questionnaire, the countries were grouped in ‘Zones’ according to the risk.

Country Risk Rating	Supplier Count
Zone 1 - Very Low (Australia, Britain, Switzerland, UK)	30

Country Risk Rating	Supplier Count
Zone 2 - Low (Greece, Italy, Slovakia)	23
Zone 3 - Medium (Argentina, China, Malaysia, Thailand)	22
Zone 4 - High (Cayman Islands, Venezuela, Mexico)	13
Zone 5 - Very High (Afghanistan, PNG, Philippines)	44
<b>Totals</b>	<b>132</b>

- Supplier industry sectors

The following table provides a list of the top five industries HSV Collective Agreement suppliers operate in and which supply to GV Health.

Top 5 – Industry Selection	Supplier Count
Health Care Supplies	36
Health Care Equipment	28
Health Care Equipment & Services	19
Health Care Distributors	9
Pharmaceuticals	6
<b>Totals</b>	<b>98</b>

HSV found in their comparison of three years of data indicated an overall increase in the total number of suppliers with medium ratings. Overall the Risk ratings were:

Risk Category	Supplier percent in each risk category		
	2022	2023	2024
Very High	0%	0%	0%
High	5%	9%	9%
Medium	35%	42%	55%
Low	30%	26%	14%
Very Low	0%	0%	0%
Non-Response	30%	23%	22%

HSV found an overall increase in the total number of suppliers with medium ratings. HSV has advised that this may be because the GV Health suppliers that were assessed are gaining an increased understanding of modern slavery risk and this is being reflected in their ability to respond positively to certain questions in the questionnaire.

#### Risks associated with procurement not facilitated by HSV

GV Health is in the process of categorising and assessing modern slavery risk associated with non-HSV suppliers.

***Mandatory Criteria 4: Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes. - (16(1)(d))***

#### **Strengthened contractual controls**

During the reporting period, GV Health adopted strengthened Modern Slavery provisions in its template contracts.

The strengthened clauses:

- a) require suppliers to take reasonable steps to identify, assess and address risks of Modern Slavery;
- b) enable GV Health to compel suppliers to produce evidence of steps taken;
- c) entitle GV Health to terminate the contract if GV Health identifies significant or persistent Modern Slavery risks or Modern Slavery practices and the supplier has failed to take action to mitigate those risks or remove those practices.

GV Health has also strengthened its procurement processes to ensure that all suppliers are subject to a contractual obligation to comply with the Victorian Government Supplier Code of Conduct (<https://www.buyingfor.vic.gov.au/supplier-code-conduct>). The Supplier Code of Conduct states that suppliers must:

*act against human rights exploitations and make all reasonable efforts to actively support the elimination of modern slavery by identifying and mitigating modern slavery risks along their supply chain.*

#### **HSV Modern Slavery Risk Mitigation Program**

During the Reporting Period, GV Health has engaged with the HSV Modern Slavery Risk Mitigation program in order to support its supplier engagement, and overall due diligence across its supplier base.

#### High risk suppliers

15 of HSV collective agreement suppliers that GVH accesses are high risk suppliers. These suppliers were asked to provide a copy of their modern slavery policy to HSV for review and feedback, with nine suppliers responding and receiving feedback on their policies.

#### Staff training

In addition to these activities, HSV has facilitated training workshops for health service staff and key health service stakeholders on modern slavery practices and the requirements of the Act. GV Health staff attended five out of the ten community of learning sessions held over the reporting period. Topics covered included:

- Victorian Government Supplier Code of Conduct
- Modern Slavery Reporting - presented by the Attorney-General's department.
- Social Procurement Framework – presented by the Department of Government Services
- Fair Jobs Code
- Modern slavery focus on the freight sector
- Deep dive risk assessment and resources.

### Supplier engagement

GV Health also invited its non-HSV suppliers to attend supplier engagement opportunities presented by HSV. HSV has upskilled more than 730 suppliers over 15 sessions, including HSV collective agreement suppliers and suppliers supplying directly through to GVH. Supplier engagement session topics included:

- Introduction to Modern Slavery Risk
- Modern slavery focus on the freight sector
- Victorian Government Supplier Code of Conduct

### ***Mandatory Criteria 5: Describe how the reporting entity assesses the effectiveness of actions taken to assess and address modern slavery risks. (16(1)(e)).***

During this Reporting Period, GV Health's focus was to implement actions to address modern slavery risk. The effectiveness of these actions will be assessed over the course of the next Reporting Period, including:

- tracking the inclusion of modern slavery clauses in non-HSV contracts; and
- reporting on the number of suppliers engaging in modern slavery training opportunities.

GV Health has also had the benefit of the Modern Slavery Risk Assessment Report completed by HSV in relation to HSV collective purchasing agreements, including those in which GV Health participates. This report is conducted by HSV annually and determines an overall risk rating for each supplier which can be compared year on year.

GV Health will also leverage tools developed by HSV to assess the effectiveness of actions taken to assess and address modern slavery risks.

### ***Mandatory Criteria 6: Describe the consultation process with any entities GV Health owns or controls - (16(1)(f))***

GV Health does not own or control any other entities. GV Health is a member, and current lead agency, of the Hume Rural Health Alliance (HRHA). HRHA is a joint venture whose function is the procurement of information and communication technology solutions for public health providers in the Hume region. All HRHA procurement is conducted in accordance with GV Health's regular procurement processes, including incorporation of mandatory modern slavery clauses and access to HSV modern slavery training.

### ***Mandatory Criteria 7: Any other relevant information - (16(1)(g))***

GV Health has engaged with HSV to enable HSV to undertake risk assessment of its top 80% spend suppliers in the 2025/26 year. GV Health will be able to report on the outcome of these risk assessments in the next reporting period.

For the upcoming year (2025-26), GV Health aims to:

- continue to facilitate training and improvement opportunities for GV Health's HSV-associated suppliers, and to extend this work to non-HSV contractors;
- develop and adopt a formal Modern Slavery policy;
- commence detailed modern-slavery risk assessments for non-HSV suppliers; and
- explore additional opportunities to incorporate assessment of modern slavery risk in the procurement process.



**Closing Statement**

GV Health is confident that the steps taken this year continues to build on its strong foundation for a robust modern slavery framework. GV Health recognises this is a continuous process and GV Health is committed to continually improving our approach, partnering with our stakeholders and working to eradicate modern slavery in its supply chains.

This statement was approved by the Board of GV Health on 24 November 2025.

Name: Michael Delahunty

Position: Board Chair

Signature: .....

