

Gippsland PHN

Voluntary Modern Slavery Statement

Modern Slavery and Human Trafficking (Modern Slavery Act 2018)

In 2018 the Australian Government passed the *Modern Slavery Act 2018*, which requires companies with consolidated revenue of over \$100 million to annually report on the risks of modern slavery within their operations and supply chains. Furthermore, the Act requires these companies to outline the actions they have taken and plan on taking to address these risks.

Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery can include serious forms of exploitation such as forced labour, human trafficking, slavery, and slavery-like practices. These practices are serious crimes, grave abuses of human rights and have devastating impacts on survivors. Modern slavery does not include practices like substandard working conditions or underpayment of workers, although these practices are also illegal and harmful and may be present in some situations of modern slavery.

Modern slavery cases do not always involve physical violence; perpetrators often use subtle threats and psychological pressure to control victims.

Modern slavery can occur in any industry or sector and has severe consequences for victims. Modern slavery distorts global and local markets, undercuts responsible business and can pose significant legal and reputational risks to entities.

The Act defines modern slavery as including 8 types of serious exploitation:

- trafficking in persons
- slavery
- servitude
- forced marriage
- forced labour
- debt bondage
- deceptive recruiting for labour or services
- the worst forms of child labour, meaning situations where children are subjected to slavery or similar practices or engaged in hazardous work.

Whilst there is a \$100 million threshold for Modern Slavery compliance reporting of which Gippsland PHN does not reach, Gippsland PHN has entered a funding contract that requires Gippsland PHN to have a Modern Slavery Statement.

The Reporting Entity: Gippsland Health Network Limited

Gippsland Health Network Limited, ABN. 52 155 514 702, trading as Gippsland Primary Health Network (Gippsland PHN) is an Australian public company, limited by guarantee. It was registered in Australia on 11 Apr 2012. We are a registered charity with the Australian Charities and Not-for-Profits Commission (ACNC), the national regulator.

Gippsland PHN is part of a national structure of 31 Primary Health Networks across Australia. Since 2015, Gippsland PHN has been committed to improving health outcomes for the people of Gippsland. Our vision has been, and remains, a “Measurably Healthier Gippsland”.

A measurably healthier Gippsland can only occur with a unified approach amongst the primary health care system and communities, so we aim to fill a vital role as a trusted and credible source of information, a vehicle for collaboration, and strong advocate, essential to local decision-making. We do this via three functions:

- **Coordination** and integration of local health care services in collaboration with Local Hospital Networks (LHN) to improve quality of care, people's experience, and efficient use of resources
- **Commission** primary care and mental health services to address population health needs and gaps in service delivery and to improve access and equity
- **Capacity Strengthen** and provide practice support to primary care and mental health providers to support quality care delivery

Funders, including the Australian Government Department of Health, Disability and Aging (DHDA), entrust Gippsland PHN to commission needs-based, locally appropriate, consumer-centred and evidence-based solutions to address the health needs of the Gippsland region.

Structure, Operations and Supply Chain

Gippsland PHN is governed by a Board of Directors which has a committee structure that includes an Audit Risk and Finance Committee, Clinical Governance & Performance Committee, CEO Performance and Remuneration Committee and Director Independent Selection and Remuneration Committee. These committees support strong oversight and monitoring of quality improvement, risk management, quality and safety of commissioned services, and organisational excellence. Gippsland PHN is further supported by an advisory structure comprised of a Clinical Council and a Community Advisory Committee.

The Board monitors progress of achievement against the organisation's strategic objectives through the annual Business Plan and Strategic Dashboard. The executive team are responsible for the operationalisation of the strategic objectives through the development and actioning of the annual Business Plan; and leading ongoing and continuous improvement through appropriate resource allocation, process management, risk management, training and development of staff, and assurance through a formal audit program. This operational structure ensures a dynamic coverage of authorities and delegations are in place to govern process and approvals for the organisation.

The organisation is classified as a medium sized business and has over 150 active contracts within its commissioning and contracting portfolio.

Gippsland PHNs Governance Frameworks embed the foundational strategic business elements guiding all areas of the organisation and include:

- Purpose and Culture
- Outcomes,
- Performance and Evaluation,
- Stakeholder Communication and Engagement,
- Clinical Governance
- Quality Improvement
- Research and Ethics
- Risk
- Finance
- Information, Communications and Technology
- Human Resources
- Commissioning
- Procurement

- Organisational Documentation,
- Data Governance, and
- Project Management

Gippsland PHNs supply chain is driven by the commissioning process. On the basis of needs assessment and prioritisation, Gippsland PHN as commissioners, decide which services or health care interventions should be provided or which outcomes need to be secured, who should provide them and how they should be paid for, and often work closely with providers to do this.

As commissioners, Gippsland PHN also has a role in supporting the development of markets so that they are sustainable and provide scalable solutions that leverage local workforces. Gippsland PHN ensures that in partnership with stakeholders and providers, we can appropriately support local primary health care needs.

Key features and benefits of Gippsland PHN commissioning approach include:

Better understanding the needs of local populations.

Encouraging the bringing together of different data sources (including through stakeholder consultation) to provide a richer view of present and future health needs, which supports better integration across care sectors and settings.

Encouraging a greater focus on outcomes that matter to consumers and communities.

Putting consumers and communities at the centre so that care is organised and delivered around them. This supports better integration, coordination of care better outcomes and value for money services.

Working in partnership with stakeholders, providers and consumers (as practicable) in the design, funding and delivery of services. This includes engaging with potential providers and consumers well in advance of procuring services, where feasible.

Procuring and contracting for services to achieve value for money using open and transparent processes that reflect the scale and scope of the procurement.

Identifying what works and changing what does not, so that resources can be invested to maximise impact.

Working with contracted providers to monitor and evaluate provider progress and impact.

The relationship between Gippsland PHN and providers is partnership focused, with

Gippsland PHN and providers working together to:

identify how the primary health care needs of local populations can be best addressed through the existing health care market, and the various activities and services supported by the PHN;

collaborate with a broader range of stakeholders in the design of new and innovative services that are culturally safe, competent and appropriate;

identify opportunities to introduce new and innovative approaches;

identify opportunities to commission for outcomes; and

collect and analyse data, monitor progress and evaluate the impact or outcomes of the commissioned service or activity.

Gippsland PHN encourages providers to:

continue to work collaboratively and openly with them;

be open in discussing their views, insights and ideas;

participate in discussions that go beyond those that occur during a formal procurement process, for example, participate in design and planning of services;

be prepared to work collaboratively with other stakeholders to benefit consumers and to build towards the achievement of desired outcomes;

share data to support continuous improvement; and

be open to new and innovative ways of funding, delivering and monitoring services, within the parameters of the PHN Funding Agreements and the PHN Grant Programme Guidelines.

An outcomes focused approach gives service providers flexibility in the way they manage their operations to achieve the agreed outcomes for clients beyond occasions of service targets.

Gippsland PHN provides support to funded service providers on performance management processes and documentation through briefings and advice as needed.

The aim is for continuous service improvement based on co-operation between Gippsland PHN and funded service providers. Performance monitoring is used to routinely check and assess the performance of funded service providers against the key outcomes of the Service Agreement and their associated service specification(s), program by program.

These elements include:

- Financial Management
- Service Data Collection
- Consumer Group
- Geographic Coverage
- Service Activities
- Service Results
- Quality of service such as client experience, service coordination/integration of care.

Performance monitoring involves several processes, including a desk top review conducted by relevant program staff of quantitative and qualitative data. Review of financial statements is also undertaken, assisted by accounting staff where necessary. Regular reviews of larger providers are performed in conjunction with staff from those providers.

The conduct of procurement activities by Gippsland PHN is governed by appropriate probity and other considerations as outlined within organisational policies and procedures, in alignment with the Commonwealth Department of Health, Disability, and Aging PHN Program Guidelines.

Gippsland PHN undertakes externally facing procurement activities as part of a cycle of commissioning to demonstrate Value for Money and progress the Quintuple Aim of Primary Health Care which seeks to improve:

- the health of the population
- the patient experience of care
- health care cost efficiency
- the experience of health care providers and clinicians
- health equity within the population

Our Commitment

Gippsland PHN has a responsibility to respect human rights in our operations and supply chains. This includes taking steps to assess and address modern slavery risks in our operations and supply chains.

Gippsland PHN accepts that modern slavery happens at the most extreme end of the working spectrum. It involves the gravest abuses of human rights and serious crimes, having severe and often lifelong consequences for its victims.

Gippsland PHN is committed to eliminating modern slavery in operations and supply chain and managing supplier risks to not engage in modern slavery or the associated risks. Gippsland PHN is committed to consistently reviewing and strengthening processes and systems to minimise the risk of human rights infringements.

Addressing Risks

Procurement teams have an important role to play in reducing the risk of modern slavery in operations and supply chains.

Gippsland PHN teams will ensure that Gippsland PHN proactively and effectively assesses and addresses potential modern slavery risks.

Risk Screening

Before engaging a supplier or renewing an existing contract, Gippsland PHN will consider the general risk profile of the procurement or the risk profile of the supplier relating to modern slavery compliance.

Although, modern slavery can occur in any sector or in any country, there are several core characteristics that increase the risks of modern slavery.

Risk screening will occur at the beginning of a new procurement or when assessing the risk of modern slavery in existing contracts to assess the general risk classification of the procurement. Risk screening will provide sufficient information to differentiate between low, medium and high-risk categories of the procurement in relation to modern slavery compliance.

Any procurement that is rated medium or high risk will progress to a more detail risk assessment.

Risk screening actions:

1. Identify for the broad operations and overall supply chain structure of the procurement/contract at thematic, overarching level;
 - a. Identify the general sector and industry involved
 - b. The produce/service required
 - c. The geographic region where the service/workforce will occur
 - d. The type of entity involved

2. Identifying modern slavery risk across the following categories:

<p>Sector and Industry Risks</p> <p>Consider whether there is a high prevalence of modern slavery in this particular industry or sector</p> <p>Risk Level: Low = 1 Medium = 2 High = 3</p>	<p>Product and Services Risks</p> <p>Consider whether there is a high prevalence of modern slavery associated with the particular good or service.</p> <p>Risk Level: Low = 1 Medium = 2 High = 3</p>
<p>Geographic Risks</p> <p>Consider where there is a high prevalence of modern slavery in the location the product or service is sourced from.</p> <p>Risk Level: Low = 1 Medium = 2 High = 3</p>	<p>Supply Chain Model Risks</p> <p>Consider whether the nature of the supply chain model likely to be involved carries a greater risk of modern slavery.</p> <p>Risk Level: Low = 1 Medium = 2 High = 3</p>

3. The overall procurement risk will be assessed. Where a procurement has a high risk rating for two or more categories, it will be considered high risk.
 - a. High risk procurements will be captured within procurement documentation and actions to address this risk will occur in the early stages of the process.

4. Gippsland PHN will work in partnership with suppliers to monitor compliance and provide support where needed. A two-way collaborative partnership will contribute to both the supplier and the Gippsland PHN team building knowledge of supply chain risks and how best to identify and manage them.

Actions

A review of Gippsland PHNs primary leading suppliers reveals all are within the health care providers and services industry and the charity, not-for-profit industry. These are not high-risk industries for modern slavery. The suppliers are Australia-based and Australia is not a country of high risk for modern slavery.

Other industries Gippsland PHN engages with locally, include information technology suppliers and services and are also assessed as low risk.

- Gippsland PHN will review and update related policies and procedures and other relevant documentation and processes to ensure modern slavery requirements are incorporated.
- Gippsland PHN will implement Tender Guidance material for procurements assessed as having a high risk of modern slavery to ensure safeguards are integrated into tender processes and documentation.
- For high risk procurements, Gippsland PHN will implement a Supplier Questionnaire to ensure appropriate supplier screening for modern slavery risk.
- For high risk procurements, Gippsland PHN will review Modern Slavery Statements published by suppliers in the sector to help identify risk mitigation measures.
- To ensure appropriate capability within Gippsland PHN, teams will complete and maintain knowledge via e-learning modules on modern slavery <https://modernslaveryregister.gov.au/resources/>
- The effectiveness of Gippsland PHNs actions to ensure alignment to the Modern Slavery Act will be assessed via internal audit processes.

It is noted all Modern Slavery Statements lodged under the Act can be accessed at:

<https://modernslaveryregister.gov.au/>.

Reporting

Reporting under the Act is required if an entity has a consolidated revenue of at least AU\$100 million over its twelve-month reporting period,

AND IS EITHER

- An Australian entity at any time in that reporting period OR
- A foreign entity carrying on business in Australia at any time in that reporting period.

As Gippsland PHN does not meet these requirements and therefore is not required to report under the Act. Gippsland PHN however voluntarily participates by declaring this Modern Slavery Policy Statement for the organisation and aligns policy and practices with its requirements.

A voluntary statement demonstrates leadership on modern slavery and is indicative of a responsible business that acts with integrity and reporting will be undertaken voluntarily.

Resources:

https://modernslaveryregister.gov.au/resources/Commonwealth_Modern_Slavery_Act_Guidance_for_Reporting_Entities.pdf

<https://modernslaveryregister.gov.au/resources/>

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