



**Peter Mac**

Peter MacCallum Cancer Centre  
Victoria Australia

## **MODERN SLAVERY STATEMENT**

**2020-21**



# DOCUMENT CONTROL & APPROVAL

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## DOCUMENT HISTORY

Version	Issue Date	Revisions / Issued to	Prepared by
1.0	February 2022	Kim Davis	Alana Chilcott
1.1	March 2022	Kim Davis	Alana Chilcott

## DOCUMENT PREPARED FOR

Peter MacCallum Cancer Institute  
(Trading as Peter MacCallum Cancer Centre)

ABN: 42 100 504 883

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Subsidiary entities included in this report:

- Peter MacCallum Cancer Foundation Ltd  
ABN: 14 786 237 480
- Cell Therapies Pty Ltd  
(Centre for Blood Cell Therapies)  
ACN: 100 285 916  
ABN: 15 100 285 916

This 2020-21 Modern Slavery Statement has been prepared by the Peter MacCallum Cancer Centre (Peter Mac), and outlines the steps we have taken as an organisation to identify, manage and mitigate specific risks around Modern Slavery in our operations and supply chains.

The statement captures the activities of Peter Mac and the entities controlled by it. It has been prepared by our Procurement Services team in collaboration with our Executive and with our controlled entities Cell Therapies Pty Ltd and Peter MacCallum Cancer Foundation Ltd.

This Modern Slavery Statement was approved by the Board of Directors of Peter MacCallum Cancer Institute, as defined by the Modern Slavery Act 2018 (Cth)<sup>1</sup> ('the Act') on December 7<sup>th</sup>, 2021.

This Modern Slavery Statement is signed by a responsible Member of Peter MacCallum Cancer Institute, as defined by the Act<sup>2</sup>



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Prof. Maxine Morand  
Board Chair



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Dr. Shelley Dolan  
Chief Executive

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1 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.

2 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 trustee—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.

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## ABOUT PETER MAC

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Peter MacCallum Cancer Centre (Peter Mac) is a world leading cancer research, education and treatment centre and Australia's only health service solely dedicated to caring for people affected by cancer<sup>3</sup>.

We have over 3,300 staff, including more than 750 laboratory and clinical researchers across four different areas - laboratory, clinical, translational, health services and implementation research - all focused on providing better treatments, better care and potential cures for cancer. Peter Mac is Australia's only public health service solely dedicated to caring for people affected by cancer.

Peter Mac has played a leading role in understanding the causes of cancer and improving how the disease is prevented, diagnosed, managed and treated, for the benefit of Victorians and Australians for over 70 years.

"We are a cancer centre unsurpassed in the world, where humanity, caring service and relentless research share equal value. Nothing but the best is good enough in the treatment of cancer."  
— Sir Peter MacCallum, Co-founder

### VISION

To provide the best in cancer care, accelerating discovery and translating to cures. Peter Mac is a proud, mission-driven organisation that leads on a global scale.

### VALUES

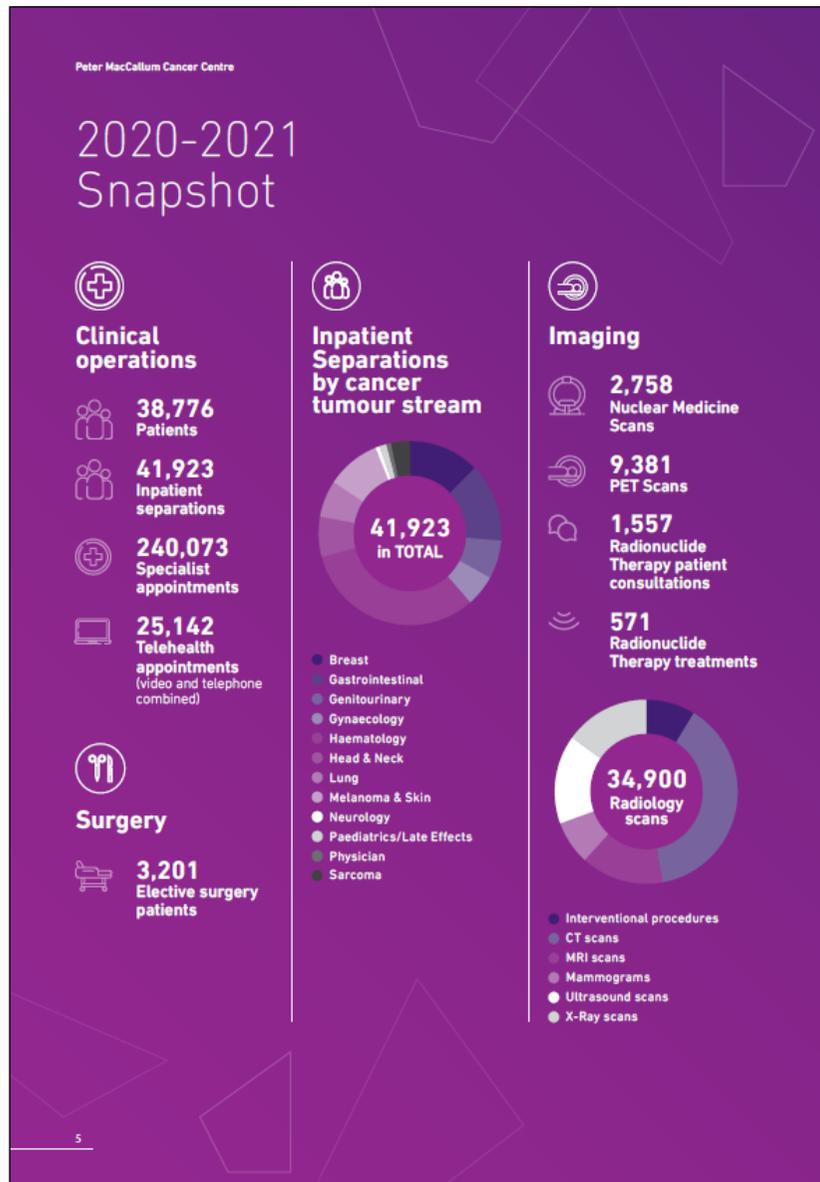
Excellence – ensuring that clinical practice is evidence-based and patient-centred and is provided by qualified and experienced staff who are accountable and appropriately credentialed.

Innovation – fostered by supporting research and a learning culture.

Compassion – adhering to the strongest ethical standards to ensure a culture of openness, mutual respect and trust is at our core.

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<sup>3</sup> Peter Mac Annual Report 2020-21 (PMC Communications, September 2021)



## OUR SUPPLY CHAINS

Peter Mac's supply chain is derived through three streams;

- Direct (Offline) Purchases – Manual Data Entry of Invoices, including under the public Private Partnership Agreement for VCCC Parkville
- Melbourne Health Supply Chain Contract (Including HealthShare Victoria – HSV)
- Central Healthcare Services – Pharmacy Purchases via MERLIN (HSV Contract)

The breakdown of expenses across these are provided in Figure 1. In addition to the above, Peter Mac as a mandated hospital utilises contracts (both directly and via Melbourne Health) with Health Share Victoria (HSV).

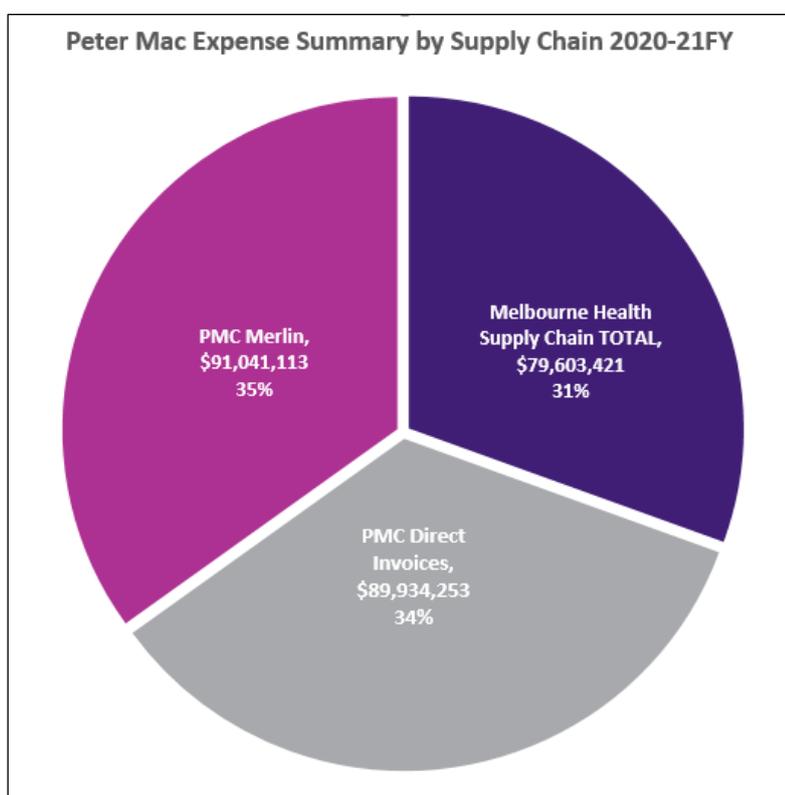


Figure 1. 2020-21 Expense Summary by Supply Chain

## PPP ARRANGEMENT – VICTORIAN COMPREHENSIVE CANCER CENTRE

The Victorian Comprehensive Cancer Centre (VCCC - Peter Mac's Parkville campus), operates under a Public-Private Partnership (PPP). This agreement is between the State Government of Victoria and Plenary Health. The **VCCC Project Agreement** is the contract binding all parties for the 25-year life of the agreement.

The VCCC Project Agreement clearly defines the roles and responsibilities of the:

- State (Department of Health and Human Services),
- Facility Owner, (Plenary Health),
- Facility Operator (Peter MacCallum Cancer Centre)
- Facility Manager (Honeywell FM).

Whilst the VCCC Project Agreement binds all parties, the contract is held between the State Government and Plenary Health. Plenary Health in turn have a contract with Honeywell. Consequently, Peter Mac does not have any contractual relationship with Plenary or Honeywell. Unfortunately this means Peter Mac has limited visibility of the terms within the contracts Honeywell and Plenary hold with suppliers, as well as the selection process or selection criteria, in particular how they manage Modern Day Slavery. Both organisations do submit a Modern Day Slavery statement annually to the Australian Border Force, which Peter Mac has access to.

Honeywell's Business Code of Conduct outlines Honeywell's commitment to respect for human rights. Honeywell also expects its supply chain to abide by its Supplier Code of Business Conduct. Their code of conduct details Honeywell's requirements and the expectations they place on their suppliers in relation to compliance with Modern Day Slavery policies and principles. As the Facility Manager, Honeywell have sub contracted a number of services including electrical contractors, plumbers, security, waste collection, pest control, medical gas supply, cleaning, carpark management to name a few.

Plenary have recently introduced and adopted a Modern Day Slavery policy declaring zero tolerance to all forms of MDS. This policy applies to all employees across its entities. Plenary are also drafting a questionnaire which will be rolled out to all suppliers in order to assess and determine the risk associated with that supplier and to determine appropriate action to mitigate any risk of MDS breaches moving forward.

Peter Mac's Facilities team are responsible for managing the VCCC Project Agreement contract on behalf of the state. Servicing of the PPP Contract accounted for \$5,525,449.71 during the 2020-21 financial year, approximately 1.9% of Peter Mac's overall expenditure.

## **MELBOURNE HEALTH**

Peter Mac outsourced its procurement & supply chain services (including Purchasing, Warehousing & Accounts Payable) to Melbourne Health on 14 December 2015.

From 15 December 2020, all tendering functions were transferred back to Peter Mac's Procurement Team, and all responsibility for strategic procurement & category management was brought back in house including responsibility for Modern Slavery risk for new and existing supplier arrangements.

Overall, indirect purchasing activity via Melbourne Health Supply Chain accounted for \$62,407,026.47 during 2020-21, approximately 24% of Peter Mac's overall operational spend during this period.

Melbourne Health spend has been accounted for as part of our ongoing reporting from HealthShare Victoria, as this data is sourced centrally.

## **HEALTHSHARE VICTORIA<sup>4</sup>**

HealthShare Victoria (HSV) is a state-wide procurement organisation that partners with Victorian public health services to procure best-value goods and services. HSV works in partnership with public health services to understand their requirements, facilitate large-scale collective tenders and manage common-

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<sup>4</sup> Modern Slavery Statement Guide for Health Services, HealthShare Victoria, 14/08/2020.

use contracts on behalf of the state. Peter MacCallum Cancer Centre purchases 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>.

HSV acknowledges the impact that COVID-19 has had on global supply chains, particularly in light of the significant increase in demand for personal protective equipment. HSV will undertake activities to investigate whether supply chains were restructured as a result of the significant procurement challenges faced during the pandemic.

## OUR MODERN SLAVERY RISKS

Peter Mac are working with Melbourne Health and HealthShare Victoria (HSV) to review the potential risk of Modern Slavery with our existing suppliers.

In the third reporting period, we intend to work collaboratively with HSV in particular to identify mitigation efforts to combat modern slavery risks, and foster collaboration between Peter Mac and suppliers to seek to address these risks.

### PETER MAC’S IDENTIFIED MODERN SLAVERY RISK

The risks of modern slavery for Peter Mac arise through its supply chains. The greatest area of risk by product type is sourcing medical goods that are associated with risks to labour and human rights. Specific areas of concern are identified below, and will be investigated in more detail within our supply chains during the 2021-22 FY.

Industry sectors	Potential Risks
<b>Construction, Property Management &amp; Services</b> <ul style="list-style-type: none"> <li>- Facilities</li> <li>- Cleaning</li> <li>- Utilities</li> <li>- Waste Management</li> <li>- Security</li> </ul>	<ul style="list-style-type: none"> <li>- Complex subcontractor arrangements can mask poor recruitment &amp; employment practices. In particular the exploitation of migrant workers</li> <li>- Historically low priority in procurement frameworks</li> <li>- Use of Child &amp; Forced labour in production of Bricks, Cement, Granite, Rubber &amp; Timber</li> <li>- Potential exposure to risk of debt bondage of adult and child workers, passport confiscations and limitation of movement.</li> </ul>
<b>Food Services</b> <ul style="list-style-type: none"> <li>- Food Production &amp; Packaging</li> <li>- Logistics</li> </ul>	<ul style="list-style-type: none"> <li>- Underpayment of staff in fruit picking and production</li> <li>- Passport confiscation, use of “deposits” to work in Australia</li> <li>- Bullying &amp; Harassment of workers</li> <li>- Workers in shifts up to 18 hours per day</li> <li>- Prevalence of child labour in cocoa, coffee and palm oil production</li> </ul>

<b>Healthcare</b> <ul style="list-style-type: none"> <li>- Medical Devices</li> <li>- Surgical Instruments</li> <li>- Electronic Medical Devices &amp; Electronics</li> <li>- IT Procurement</li> <li>- Uniforms</li> <li>- Personal Protective Equipment (PPE)</li> </ul>	<ul style="list-style-type: none"> <li>- Low cost labour, particularly for items sourced from Asia</li> <li>- Pressure to meet unrealistic production targets</li> <li>- Workers' exposure to toxic materials</li> <li>- Compromised Health and safety standards to produce medical instruments</li> <li>- Forced labour in production of raw materials (particularly metals for electronic components and rubber)</li> <li>- Forced labour in production of cotton and sweatshop labour in clothing &amp; linen production</li> </ul>
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Ensuring the mitigation of specific risks identified relating to Construction, Property Management and Services will be managed through Peter Mac's PPP agreement with Plenary Health and Honeywell for the VCCC building, and with building partners at our other campuses. This work will be undertaken by Procurement Services, with extensive support by the Facilities & PPP department located in Parkville.

Management of Modern Slavery risks in Food Services will be managed via Procurement, who currently manage these services within the hospital. The majority of Foods Services contracts are implements from HSV agreements, and will be managed directly with them through 2021-22.

Procurement's main tasks for the 2021-22 year will consist of identifying and reducing modern slavery risks in Healthcare concern areas, in particular Medical Devices, IT Procurement and Uniforms, which will be undertaken from late 2021, with assistance from HSV.

### HSV RISK ASSESSMENT OF PETER MAC CONTRACTS 2020-21

As part of its ongoing support to all health services, HealthShare Victoria has worked with Peter Mac to identify potential and actual risks within their portfolio in the past year. The HSV Procurement Policy<sup>5</sup> outlines HSV's commitment to assist mandated health services by assessing and addressing modern slavery risk in health service supply chains within Collective Purchasing Agreements, with a view to assisting mandated health services with meeting their Reporting Requirement under the Act.

In assessing suppliers, a modern slavery risk assessment tool, comprising of macro assessment and micro assessment components was utilised. HSV Data and Analytics identified 160 suppliers from supplier spend data for the period 2020-21 for Peter Mac.

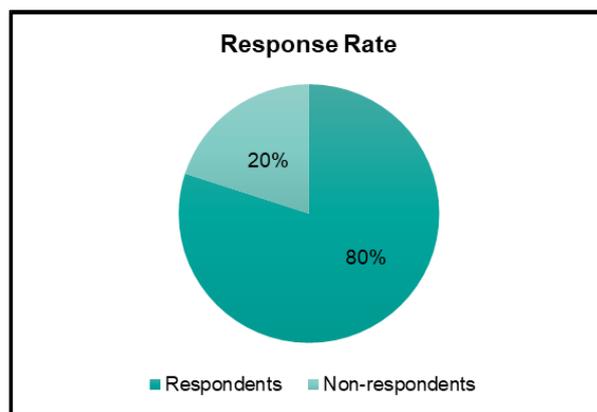


Figure 1 Response Rate to HSV Supplier Questionnaire 2020-21

<sup>5</sup> HSV Procurement Policy, POL400 (October 2020) p. 4. See also, HSV Modern Slavery Toolkit (2020), p. 6.

Of the respondents the below figure 2 demonstrates the risk rating identified across the respondents. The majority of Peter Mac suppliers (81%) register as low-medium risk at the time of reporting, with 19% of identified suppliers registering in the high-very high risk.

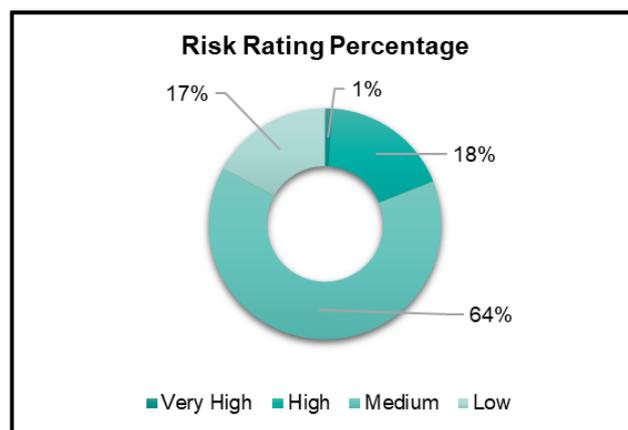


Figure 2 Percentage of Respondents by HSV Risk Rating

Peter Mac acknowledges that the risk identification is not necessarily confirmation of Modern Slavery practices within these suppliers. However, these providers will be prioritised via HSV to ensure that the risks identified are reported accurately and remediated through ongoing contract management activity both in-house and through HSV Collective agreements.

#### COVID-19 IMPACT ON RISK ASSESSMENT

While work has been undertaken to develop the tools to commence risk assessment activities, we acknowledge that the significant ongoing impact of the COVID-19 pandemic during 2020-21 has resulted in some reduced capacity to conduct internal detailed risk assessments of our operations and supply chains in this financial year.

Having said that, Peter Mac understands that the pandemic has heightened the risk of modern slavery in the health care sector. The International Labour Organisation has predicted that between 20.1 million and 35 million more people will be in working poverty than in the pre COVID-19 estimate.

The continued impact of the COVID-19 pandemic on all health services' supply chains (including Peter Mac's) has posed unprecedented challenges both locally and globally, disrupting supply chains, causing many workers to lose their jobs, and being forced to look for opportunities in informal economies, many of which are rife with potential exploitation. Businesses are contending with difficult human rights trade-offs to secure their financial viability.

The COVID-19 pandemic has also provided employers with stronger incentives and greater latitude for exploitation as there is reduced scrutiny of labour standards, and instability of tier 2 and 3 suppliers has in essence muddied the waters around ensuring clear reporting of supply chain slavery risks are maintained.

Peter Mac continues to demonstrate its commitment to identifying and mitigating modern slavery using the tools created in the last period, and building on necessary research of its supply chains and operations to update sound policy and tools required to ensure a firm foundation is in place, in order to provide robust reporting from 2021 onwards.

### **The Peter MacCallum Foundation**

The Peter MacCallum Cancer Foundation (PMCF) is the fundraising arm of Peter Mac. As well as being a specialist public cancer hospital, Peter Mac is a research institute. PMCF raises philanthropic funds to support cancer research at Peter Mac as well as other activities and equipment which would not normally be considered the responsibility of Government.

In 2020-21, PMCF has completed a preliminary review of potential risk of modern slavery within its existing suppliers, updated screening of key suppliers to include modern slavery and updated the standard supplier agreement to include clauses on modern slavery.

In 2021-22, PMCF will:

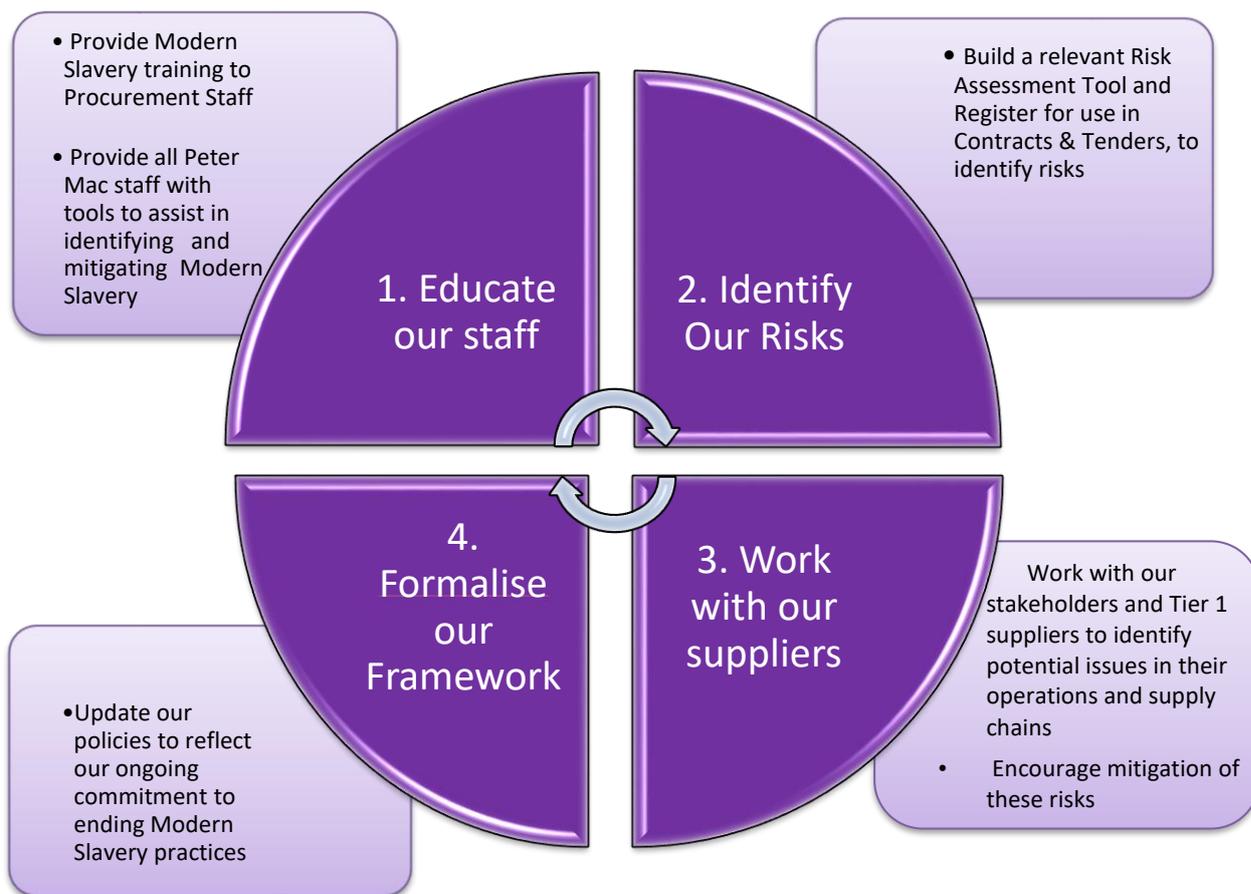
- Continue to work with PMCC Procurement as it further develops its policies and procedures in relation to modern slavery.
- Continue to ensure Foundation subcontractors respond to the modern slavery section of the due diligence questionnaire.
- Perform risk profile screening of suppliers of data services, uniforms and merchandise, either through the due diligence process or confirming suppliers have provided visibility of their supply chain.
- Consider using other suppliers that have reduced risks in areas of concern.
- Provide training to staff to increase awareness of modern slavery risks in our activities.

### **Cell Therapies Pty Ltd**

Cell Therapies Pty Ltd (CTPL) is an Australian-based, globally-active commercial contract development and manufacturing company, specialising in cell therapy, gene therapy, regenerative medicine, and cellular immunotherapy products.

During 2019-20, CTPL did not identify any specific risk areas with regard to Modern Slavery not already identified by Peter Mac's Procurement team; a specific issue identified which aligns closely with our own risk is in the area of Personal Protective Equipment (PPE), which has been highlighted particularly during the pandemic. PPE, which for the most part has originated from China, has been of concern to Peter Mac throughout the pandemic due to the dependency on items provided to us via HealthShare Victoria.

# OUR MODERN SLAVERY ACTION PLAN



## EDUCATING OUR STAFF

Training is ongoing for Peter Mac's Procurement team, with dedicated procurement training packages sourced through Australian Border Force. The Procurement Team also participate in the HSV Community of Learning program specifically around Modern Slavery, which has been in place for two reporting periods and is ongoing.

At an organisational level, we have also researched and are in the final stages of implementing with SafeTrac a customised Modern Slavery training module into the hospital's learning management system (Learning Hub), which the latest updates will be available to procurement stakeholders from late 2021.

## IDENTIFYING OUR RISKS

Peter Mac's Procurement Team developed a Risk Assessment Tool for use by the team in its direct procurement activities, to assist in identifying specific risks across the four areas of concerns. Utilising a combined macro and micro-environmental research approach, the tool criteria is based on the risk factors set by the Australian Border Force below<sup>6</sup>:

<p><b><u>Geographic Risk</u></b></p> <p>Reviewed based on Location of Head Office, Manufacturing &amp; Main Operations, Service &amp; Repair Sites and Support (Help Desk) locations</p> <p>Checked against countries where there is a real (or potential) risk of Modern Slavery practice</p>	<p><b><u>Sector &amp; Industry Risk</u></b></p> <p>Risk is calculated based on the combination of industry sectors and subsectors involved, ahead of any procurement activity to be undertaken.</p> <p>Ensures that Procurement are aware in advance of any sector conflicts that may require scrutiny during the procurement process to reduce Modern Slavery Risk</p>
<p><b><u>Supply Chain Model Risk</u></b></p> <p>Reviewed against responses to a questionnaire provided as part of procurement responses;</p> <p>Scores determine actual and potential risk of Modern Slavery by the supplier, and allows Procurement to put in place at Contract Commencement additional measures to monitor and remediate suppliers as required</p>	<p><b><u>Product &amp; Service Risk</u></b></p> <p>Calculated based on combination of product sourced and country of origin;</p> <p>Intention of the score is to estimate potential for Modern Slavery Risk within specific product ranges, based on raw materials used, labour practices to manufacture or produce the product or service on offer.</p>

*Figure 3 Macro-environmental Risk Factors Used for Peter Mac Risk Tool. Refer to references for sources used.*

The Risk Assessment Tool will come into effect for all new Peter Mac procurements from early 2021.

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<sup>6</sup> Addressing Modern Slavery in Government Supply Chains: A toolkit of resources for Government procurement officers, Australian Government, 2018. Page

## **WORKING WITH OUR SUPPLIERS**

Drawing from resources provided by the Australian Government Guide, Peter Mac has adopted templates and clauses from the Federal Procurement Toolkit in developing appropriate tools to engage with our suppliers<sup>7</sup>.

### **Peter Mac Supplier Questionnaire**

A mandatory Supplier Questionnaire was implemented from early 2021, in line with the Risk Assessment tool. The questionnaire, provided to both new and existing suppliers, has been sourced from the Federal Department of Home Affairs' Supply Chain Toolkit, and requires responses relating to provision of documentation such as a supplier's own statement, organisational policies, training, supplier engagement processes and visibility of operations and supply chains in identifying modern slavery risk in their own suppliers. Responses to the Supplier Questionnaire form part of the supplier's risk profile as part of the overall procurement risk assessment process, and are registered on Peter Mac's Modern Slavery Risk Register.

### **Changes to Peter Mac Contract Terms**

Peter Mac's Legal Counsel reviewed and endorsed additional clauses to be added to all new contracts from early 2021. We have sourced sample clauses from both the Department of Finance's Clause bank, and from HealthShare Victoria (HSV) for inclusion in this review.

### **Working with Melbourne Health Supply Chain**

We will be continuing our work with our supply chain partner Melbourne Health to ensure all suppliers engaged to provide goods & services at Peter Mac are screened for any potential risks regarding Modern Slavery. The frameworks to manage this relationship will be formalised during 2021-22, in line with changes to our contract with them.

### **Working with HealthShare Victoria**

In recognition of the significant role that HSV has in health service supply chains and the substantial resourcing constraints placed on Peter MacCallum Cancer Centre as a result of the COVID-19 pandemic, HSV undertook numerous activities during the reporting period to address modern slavery risks in Peter MacCallum Cancer Centre's supply chains.

HSV established a modern slavery program of work and appointed a Supply Chain Risk Manager to implement the program and support Victorian health services to address modern slavery risks in their operations and supply chains. The program encompasses health service education and support, supplier engagement, due diligence and remediation, amongst other activities.

HSV upholds the Australian Government's position on modern slavery. HSV has updated its Procurement Policy to include a statement on combatting modern slavery in health supply chains and capturing allegations of modern slavery practice(s) in its remit of complaints management, enabling the development

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<sup>7</sup> Addressing Modern Slavery in Government Supply Chains: A toolkit of resources for Government procurement officers, Australian Government, 2018. Page

of remediation processes. The Procurement Policy is an important internal document that outlines HSV's position on procurement governance and activities, including its response to Government policy.

The amendment to the Procurement Policy consolidates HSV's position on modern slavery, which will in turn inform other internal governance amendments and educational resources for the health sector.

The modern slavery section of HSV's website contains information and resources to assist reporting entities required to submit a Modern Slavery Statement.

As part of its due diligence, HSV has included a modern slavery clause in Invitation to Supply (ITS) documentation to ensure prospective suppliers acknowledge their responsibility to health services that are reporting entities pursuant to the Act. In addition to its inclusion in the ITS, this clause has been incorporated into select executed contracts.

As well as specific modern slavery provisions, suppliers wishing to conduct business with HSV, public hospitals or any other branch of the Victorian Government must aspire and commit to meet the Supplier Code of Conduct.

Under the Supplier Code of Conduct, suppliers are expected to proactively identify, address and – where required by legislation – report on risks of modern slavery practices in their business operations and supply chains.

To further enhance its approach to due diligence, HSV has developed a Supply Chain Management dashboard. The dashboard synthesises and analyses HSV supply chain data, providing additional capability to detect and prevent modern slavery risk in health supply chains. This platform enables HSV to:

- Conduct in-depth supply chain mapping (tier one+);
- Develop detailed modern slavery risk analysis and dashboard reporting;
- Screen prospective suppliers for modern slavery risk as part of ITS due diligence activities;
- Assess incumbent suppliers on modern slavery risk through tailored supplier questionnaires; and
- Manage remediation actions arising from due diligence or supplier questionnaires.

In addition to these activities, HSV has facilitated training workshops for HSV staff and key health service stakeholders on modern slavery practices and the requirements of the Act. This training is available to Peter Mac Procurement staff in addition to that provided directly by ABR and Safetrac.

The significant impact that COVID-19 has had on health procurement and supply chains has meant that HSV had to postpone planned supplier engagement activities and engaged with suppliers during this second year. While the priority for the first reporting period was to implement actions to address identified high-risk areas, HSV has continued to investigate what actions it can take in response to the modern slavery risks caused by the COVID-19 pandemic.

### **Formalising our Framework**

Peter Mac is in the final stages of developing the full procedure (policy) document that will bring together our action plan, and provide a fully transparent set of processes, guidance and templates for use by our internal stakeholders to work with both the Procurement team and Peter Mac's tier 1 suppliers, to identify and mitigate potential Modern Slavery risks as part of Peter Mac's overall Procurement Process.

Once endorsed, the procedure and all supporting elements of our action plan will be communicated to the rest of the organisation, and the Procurement Team will engage with all internal and external stakeholders in administering this framework ahead of our next Statement for the 2021-22 financial year.

### Synergies with Victorian Social Procurement framework

In addition to drawing on the reporting requirements for Modern Slavery as set out in the Modern Slavery Act, Peter Mac’s procedure also intentionally takes a holistic approach in managing potential slavery risk, in that our intention is to reduce risk, at least in part, by concurrently increasing utilisation of the Victorian Government Social Procurement Framework where a risk may potentially correspond with a Peter Mac social priority objective.

Several related State reporting requirements that will serve to reduce risk include;

- Ensuring stakeholders are guided to “Local Jobs” providers where applicable and appropriate; Australian owned & operated suppliers typically have lower modern slavery risks;
- Guiding stakeholders to utilise verified Social Benefit providers, including verified Victorian (and National) Aboriginal businesses and verified Social Trading businesses that provide specific benefits to disadvantaged and disabled persons in Victoria; and
- In addition to specific Modern Slavery clauses, Peter Mac Contracts and RfX documentation require suppliers to provide specific information relating to their environmental management, engagement with Aboriginal and Social Benefit providers and adherence to gender equality and support of family violence prevention and assistance policies.

## THE YEAR AHEAD

In a year again significantly interrupted by the challenges of COVID-19, the Peter Mac Procurement Team utilised its limited resources in 2020-21 to commence a range of research activities, with the intention of solidifying an initial framework for use by mid-2021-22. The below table provides the progress of these activities, which have progressed significantly as resourcing stabilised in alignment with pandemic-related supply activities.

Framework Milestone	Status at 30/06/2021	Current Status 31/12/2021
<b>Development of PMCC Modern Slavery Framework, including;</b> <ul style="list-style-type: none"> <li>○ Modern Slavery Procurement Policy</li> <li>○ Risk Assessment Tool for utilisation in PMCC Tendering activities</li> <li>○ Customisation of Questionnaires to Existing and Potential Suppliers</li> <li>○ Development of PMCC MS Risk and Supplier Register</li> <li>○ Updating MS Clauses in PMCC Contract Terms &amp; Conditions</li> </ul>	<p>In Development</p> <p>Completed</p> <p>Completed</p> <p>Completed</p> <p>Completed</p>	<p>(TBC)</p>

Training of Core Procurement Staff in identifying, managing and mitigating Modern Slavery practices	Ongoing	Ongoing
Introductory training for all PMCC stakeholders in Modern Slavery	Ready to Launch	Update to be launched NOV 2021
Working with HSV to understand Human Rights & Modern Slavery Requirements	Ongoing	Ongoing

With our framework and the majority of processes now completed and ongoing, we're well placed to continue formal and ongoing consultation with both our internal stakeholders and our supply chains from mid-2021, to provide a clearer and practical snapshot of Peter Mac's challenges in identifying Modern Slavery concerns across the hospital campuses and entities.

**Modern Slavery Training**

SAFETRAC Modern Slavery Training has been completed by four Procurement team members. With the new Procurement restructure, all new team members will be required to complete the training by mid-2022. We will draft a schedule for all Contract Managers to complete training in Modern Slavery by the end of 2022.

## APPENDIX 1 – MANDATORY REPORTING CRITERIA INDEX

Legislation	Reporting Criteria	Location	Page(s)
<b>Australian Modern Slavery Act 2018 (Cth)</b>	Section 16 (a) Identify the reporting entity.	Important Information About Peter Mac	2, 4-9
	Section 16 (b) Describe the reporting entities structure, operations and supply chains.	About Peter Mac Our Supply Chains	4-9
	Section 16 (c) 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.	Our Modern Slavery Risks	9-13
	Section 16 (d) Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address the risks, including due diligence and remediation processes.	Our Modern Slavery Risks Our Modern Slavery Action Plan	11-12 14-18
	Section 16 (e) Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.	Our Modern Slavery Action Plan Working with Our Suppliers Working with HSV Supply Chain	14-18
	Section 16 (f) Describe the process of consultation with: (i) any entities that the reporting entity owns or controls, (ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement.	About Peter Mac Our Modern Slavery Risks Our Modern Slavery Action Plan	5-9 11-12 14-18
	Section 16 (g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Our Modern Slavery Action Plan The Year Ahead	14-18 18-19

## APPENDIX 2 – REFERENCES

1. Annual Report 2020, Peter MacCallum Cancer Centre.
2. Modern Slavery Statement Guide for Health Services, HealthShare Victoria, 14/08/2020.
3. Modern Slavery Risks, Rights & Responsibilities, Australian Council of Superannuation Investors, February 2019
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