

RACGP

Modern Slavery
Statement 2022



RACGP

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The Royal Australian College of General Practitioners Ltd
100 Wellington Parade
East Melbourne, Victoria 3002

Tel 03 8699 0414
Fax 03 8699 0400
www.racgp.org.au

ABN: 34 000 223 807

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We acknowledge the Traditional Custodians of the lands and seas on which we work and live, and pay our respects to Elders, past, present and emerging.

Important Information

This Modern Slavery Statement (Statement) is made pursuant to s16(1) of the *Modern Slavery Act 2018* (Cth) (Act) and sets out the risks of modern slavery in The Royal Australian College of General Practitioners' (RACGP's) operations and supply chains, the actions taken to assess and address those risks during the financial year, and how we assess the effectiveness of those actions.

The Statement covers the financial year ending 30 June 2022 (FY22) and applies to RACGP, the RACGP entities considered reporting entities under the Act, and the controlled subsidiaries of RACGP, including RACGP Training Services Pty Ltd.

In January 2022, RACGP completed the acquisition of GP Synergy Ltd, enabling GP Training deliverables to support registrars across New South Wales, now named RACGP Training Service Pty Ltd.

References to 'RACGP', 'we', or 'our' throughout this Statement includes all RACGP subsidiaries covered by this Statement, unless otherwise specified.

Board Approval

The Statement was approved by the Board of Directors of RACGP, as the holding company of the RACGP group of Companies on 7 December 2022.

Version details

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CEO Message

I am pleased to present the RACGP's Modern Slavery Statement for 2022, which has been prepared in accordance with the requirements of the Act.

At RACGP, I am proud that we are committed to living the values of Progressive Leadership, Quality, Ethics, and Professionalism and seek to always strive for better for our members, our communities, and our employees in our dedication to creating a healthier Australia. Our success greatly depends on how we demonstrate our integrity, transparency and accountability as fundamental pillars to meritorious ethical behaviour.

At RACGP, we understand that we are exposed to modern slavery risks in our supply chain. Accordingly, we have a responsibility to ensure these risks are identified, understood and appropriately managed.

We acknowledge that eradicating modern slavery is a complex task that requires a global response from governments, businesses, and the international community. As a proud Australian organisation dedicated to improving community health since our founding in 1958, we have an important role to play. We are committed to continuing to improve our ability to identify and address the risks of modern slavery within our organisation, our supply chain and the communities in which we operate.

As the very first Modern Slavery Statement prepared by RACGP, I am pleased to present a report that reflects the commitment of RACGP in our pursuit to implement processes relating to modern slavery risk identification and mitigation. I am proud of the progress that has been made throughout 2022 and endorse the commitment we collectively share to do more work on this important social issue.



Paul Wappett
Chief Executive Officer

Introduction

In an increasingly complex and interconnected world, maintaining effective oversight and transparency over all potential sources of modern slavery risk in an organisation's operations and supply chains has never been more challenging.

Growth by acquisition of general practitioner (GP) Training delivery is an exciting and historic transition in RACGP's commitment to Australian community health outcomes through the extended range of support for GPs.

We are conscious that it comes with responsibility as new products and services, and new suppliers (including the supply chains of these suppliers) have the potential to increase the complexity of modern slavery related risks that the RACGP faces. At the same time, community awareness of the extent of modern slavery practices both in Australia and globally, and expectations on organisations to understand and manage these risks effectively, continue to evolve and increase.

RACGP takes its responsibility to meet and exceed these expectations seriously. As Australia's largest professional practice organisation representing urban and rural GPs, the RACGP's mission is to improve the health and wellbeing of all people in Australia by supporting GPs, general practice registrars and medical students in their pursuit of excellence in patient care and community service. The RACGP is committed to raising GP awareness of the health needs of disadvantaged and vulnerable communities and advocating for culturally appropriate health delivery systems that improve health outcomes. On this basis, addressing modern slavery risk is a natural alignment to our commitments toward improving health and wellbeing.

RACGP has an ongoing focus on increasing the awareness and capabilities of our people in identifying and addressing modern slavery risks in the conduct of our business dealings. RACGP's *Code of Conduct* supports this focus, articulating the responsibility and conduct required of every director, employee and contractor while working at RACGP, and our commitment to conduct our business in accordance with applicable laws, regulations, and our internal policies and procedures. All RACGP people are required to adhere to the *Code of Conduct* and are required to undertake *Code of Conduct* compliance training on a regular basis.

Further commitments to addressing modern slavery risks include RACGP's dedication to assessing internal practices, processes and policies, to identify key improvement areas, building a roadmap to uplift our maturity in how we face into these risks. As a new journey that RACGP has embarked upon, we are committed to building this roadmap and address the risk of modern slavery within our organisation, our supply chain and the communities in which we operate.

Our organisation

General

The Royal Australian College of General Practitioners (RACGP) is the voice of general practitioners (GPs) in our growing cities and throughout rural and remote Australia. For more than 60 years, we've supported the backbone of Australia's health system by setting the standards for education and practice and advocating for better health and wellbeing for all Australians.

We cultivate a stronger profession by helping the GPs of today and tomorrow continue their professional development throughout their careers, from medical students and GPs in training, to experienced GPs. We develop resources and guidelines to support GPs in providing their patients with world-class healthcare, and help with the unique issues that affect their practices. We're a point of connection for GPs serving communities in every corner of the country.

Australia's GPs see more than two million patients each week, and support Australians through every stage of life. The scope of general practice is unmatched among medical professionals, so the RACGP supports members to be involved in all areas of care, including aged care, mental health, preventive care and Aboriginal and Torres Strait Islander health.

Patient-centred care is at the heart of every Australian general practice, and at the heart of everything we do.

The RACGP currently operates across eight offices – in Melbourne, Sydney, Canberra, Brisbane, Perth, Darwin, Adelaide and Hobart. All of these offices operate on unique Aboriginal lands. The RACGP employs approximately 600 full-time and part-time employees, including staff who identify as Aboriginal and/or Torres Strait Islander people.

Our functions currently support over 44,000 members working in or towards a career in general practice. The RACGP conducts its activities within the following key areas: education and training for general practice, innovation and policy for general practice, and advocacy.

The RACGP has a National Faculty of Aboriginal and Torres Strait Islander Health, which was established in February 2010. In 2020, the faculty celebrates 10 years of operation. It is governed by an Aboriginal-led Council and an Education Committee, is supported by a team of seven staff, and currently has over 11,000 members. The faculty provides the RACGP with strategic and operational support to advance the RACGP's work in the field of Aboriginal and Torres Strait Islander health.

Australian General Practice Training (AGPT)

In 2017, the then Federal Minister for Health, the Honourable Greg Hunt, announced that the delivery of the Australian General Practice Training (AGPT) Program would return to the colleges. This transformational decision to reform general practitioner (GP) training in Australia signified the then government's commitment to providing nationally standardised, high-quality, and well-distributed training to all GPs across the nation.

As of 1 February 2023, AGPT will be managed and delivered by the RACGP and the Australian College of Rural & Remote Medicine (ACRRM). This new training model will build upon the successes of Regional Training Organisations' programs and provide a nationally consistent, efficient, and locally responsive approach. The RACGP is now undergoing a significant transformation as the management and provision of the Australian General Practice Training (AGPT) program is returning to the organisation. Profession Led Training will launch on February 1, 2023.

The College will operate approximately 28 facilities around Australia to manage the AGPT program, and our preparation includes consideration of how we address our modern slavery commitments while rolling out our systems and processes to enable training support by 1 February. Our commitment for FY23 is therefore to identify the roadmap during our transformation process that will can be effectively implemented through FY24 and FY25 with established organisational structures and people in place.

Procurement

Procurement manages end to end source to contract activities, contract lifecycle management, and purchasing activities for the organisation.

RACGP currently works with approximately 494 suppliers and contractors across an annual spend of \$228.7M. Suppliers are largely Tier 2 and 3 Australian based suppliers predominantly falling into the categories of Professional Services and Consulting, Property and Building Management, IT software and hardware, Training Operations, Marketing and Advertising.

Spend Categories	Annual Spend Oct 21 – Sep 22
Professional Services and Consulting	\$89,636,573
IT hardware and Software	\$8,651,707
Property and Building Management	\$7,471,951
Faculty and Training Operations	\$6,815,603
Marketing and Advertising	\$997,018
Insurance	\$649,611
Travel	\$130,448
GRAND TOTAL	\$114,352,910

The uplift of Procurement and Supply Chain is supported by the recent appointment of new Head of Property and Procurement reporting directly to the Chief Operations Officer as a commitment to investing in experienced capability and enable planning and implementation of activities to formulate a comprehensive Modern Slavery road map.

Capability assessment performed in August 2022 has identified requirement for significant uplift in areas of source to contract, category management, supplier management, reporting, and systems for enablement of key Procurement programs including supporting supplier diversity, sustainability, and modern slavery. Key elements of these are identified for initial focus as part of the development of a structured modern slavery roadmap.

Work in progress to uplift capability include end to end process mapping, assessment of existing tools and templates, team training, and the delivery of new tools to address the source to contract process which is in progress on a rolling basis through FY23.

Governance

Legal, Risk and Compliance manages the governance of the organisation including policy frameworks, legal support, contract resolution support, development of precedent contract documents, audit remediation support, and reporting.

The uplift of governance is supported by the recent appointment of new Head of Legal, Risk and Compliance reporting directly to the Chief Operations Officer as a commitment to investing in experienced capability and enable planning and implementation of risk framework and compliance activities to address Modern Slavery risks.

Work has been performed in identifying key areas that support code of conduct and modern slavery including the inclusion of terms within purchase order terms and precedent contract templates, and in the development of contract management training across the organisation to support awareness of contract manager obligations aligned to modern slavery risks, fraud, and social responsibility.

RACGP Modern Slavery Risks

RACGP has commenced our roadmap to identify our Modern Slavery Risks that includes assessment of current supply chains and operations. It is recognised that given the extensive globalised nature of our supply chains there is complexity in assessing modern slavery risks, however market benchmarking from similar organisations identifies the current areas of risks present within RACGP supply chains:

- Labour practices in offshore manufacturing facilities globally that provide goods across multiple RACGP spend categories including IT Software and Hardware, and consumables included within Property and Building Management and Marketing and Advertising.
- Labour practices in the sourcing of raw materials including rare earth elements, cotton, rubber, and minerals.
- Industry risks associated with textiles, electronics, cleaning services, professional consulting services and security and maintenance.

In addition to general risks, RACGP has identified the following high-risk areas specific to the health sector:

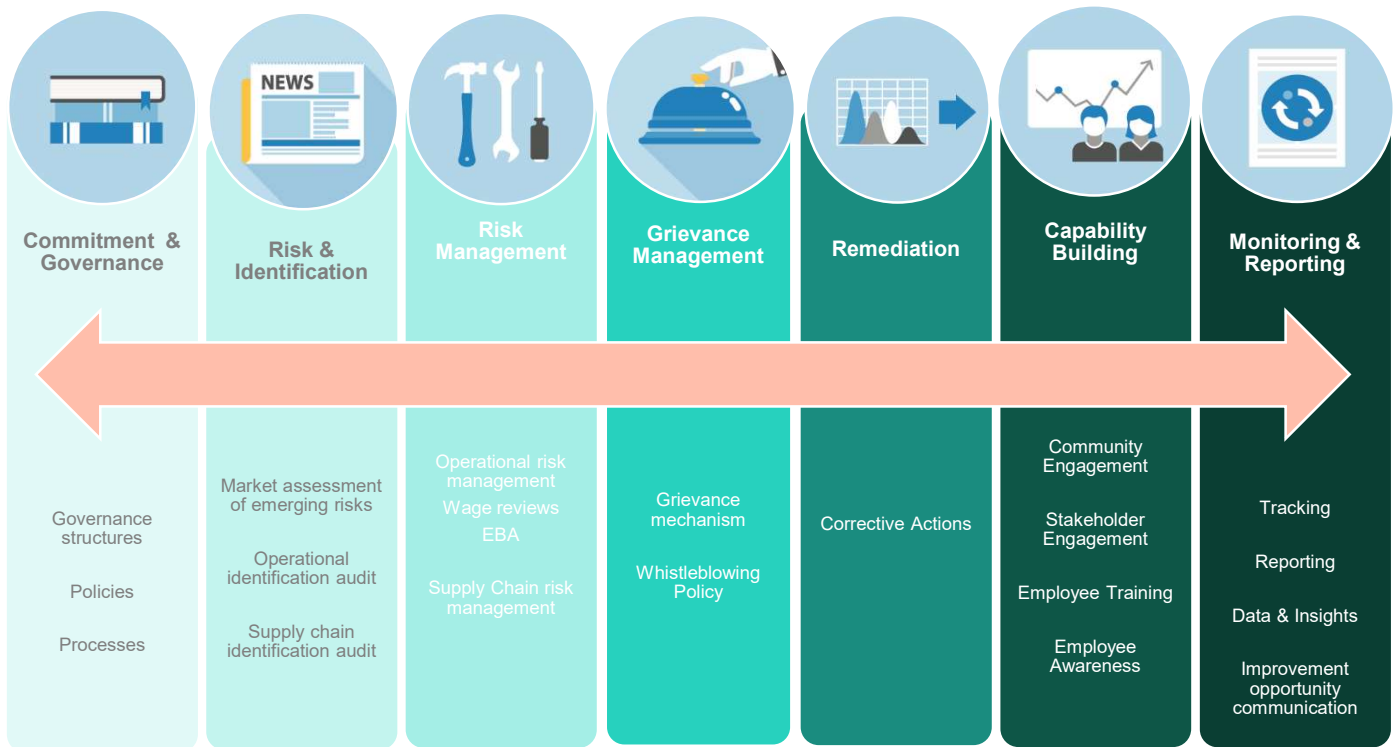
- IT hardware
- Surgical and examination gloves
- Surgical instruments
- Medical training equipment
- Cleaning services

RACGP will develop a roadmap that considers a risk assessment methodology to increase the visibility of high-risk areas within the supply chain of the organisation.

The increased demand of medical consumables due to COVID-19 has elevated the risk of modern slavery exposure due to increased sourcing from countries with a greater incidence of modern slavery.

Managing Modern Slavery at RACGP

RACGP is committed to continuing our understanding of modern slavery risks and more effectively manage these across the operations and supply chain. To support this commitment the Modern Slavery Framework was developed in 2022 to identify key elements required to identify, manage, remediate, and report on our risks.



Market benchmarked best practice was used to develop RACGP's Modern Slavery Framework utilising reference materials including the UN Guiding Principles on Business and Human Rights, PWC's Modern Slavery Reporting in Australia, the Human Rights Due Diligence Framework by the Ethical Trades Initiative and Australian Border Force's Online Register for Modern Slavery Statements and the Commonwealth Guidelines for Reporting Entities.

2022 Actions on Modern Slavery

Further to the creation and delivery of the Modern Slavery Framework, the following items have been identified and implemented in 2022.

Commitment and Governance

- Modern Slavery Framework in development for endorsement by the RACGP Executive and Board.
- Inclusion of clauses and terms within RACGP precedent contracts and purchase order terms to address supplier code of conduct and Modern Slavery.
- Procure to Pay policy reviewed and updated to include RACGP positions on supporting management of Modern Slavery risks and Supplier Diversity.
- Supplier Code of Conduct developed for endorsement by Executive and implementation.

Risk and Identification

- Supplier spend analysis for data and insights on key spend areas and potential risks has commenced.
- Supplier segmentation analysis in progress to identify Material, Strategic, and Tactical Suppliers to assess potential supplier risk areas.
- External market analysis on key suppliers commenced using external resources including IBISWorld and independent market reports.

Risk Management

- Procurement Category Management process in planning pipeline for development 2023 to validate key identified areas of potential risk.
- Framework for a Modern Slavery supplier attestation and audit process is being developed for material suppliers, for completion to implement in 2023.
- Uplift of Sourcing templates in progress to include Modern Slavery into Request For Proposal (RFP) document templates including Evaluation Criteria templates for Sustainability and Social Responsibility with specific criteria questions to address Modern Slavery risks through the supply chain.

Capability building

- Contract management training developed and endorsed by the RACGP Executive
- Contract management training implementation in progress across RACGP organisation

Monitoring & Reporting

- Working group established by Office of CEO, Legal, Risk and Compliance and Procurement teams to work with stakeholders across RACGP for the purpose of building out the annual Modern Slavery action plan in line with organisational targets and to recommend a strategic proposal to assess Modern Slavery across the RACGP as an ongoing organisational concern.

Effectiveness of Modern Slavery

The RACGP initiated its commitments to addressing Modern Slavery risks in 2022. As such there is currently no data available on the effectiveness of actions already undertaken to address the risks.

RACGP is confident that with the implementation of methods including internal assessments and surveys, validation from sourcing supplier questionnaires, and external benchmarking, RACGP will be able to fairly assess the effectiveness of the Modern Slavery Framework and resulting actions that are implemented from this.

Consultation Process

RACGP already has instituted communication and consultation processes in place to manage stakeholder relationships internally within the organisation and also across the RACGP's member base. This process uses a mix of:

- Formalised Governance based steering committees
- Comprehensive internal intranet organisational portal called Pulse for organisational engagement
- Internet based communications and news platform Workplace
- Regular townhalls and collaboration
- Education training platform
- Embedded culture and values system

This same process and group of tools is currently in the process of being rolled out to RACGP Training Services and will also be utilised for any future joint venture or subsidiary to communicate and engage upon RACGP's Modern Slavery commitments.

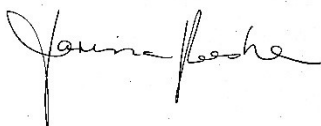
RACGP will measure our effectiveness by way of:

- ongoing reviews of our risk assessment frameworks and processes to ensure appropriate and current consideration of human rights issues across our operations and supply chains.
- periodic reviews of the risk profiles of our supplier base with appraisal of the progress made in reducing supplier risk profile through action and review (e.g., responses to questionnaires).
- monitoring progress against modern slavery key performance indicators, including:
 - the number of staff made aware of modern slavery considerations through communications and training;
 - market reviews (e.g., tenders) that have incorporated an assessment of supplier operations and supply chain modern slavery risks;
 - RACGP supplier contracts being required to contain modern slavery clauses;
 - high-risk suppliers engaged in response to risk alerts or undertaking proactive reviews;
 - progressive reduction in the number of suppliers identified as being of a higher risk of modern slavery;
 - completion by suppliers of a modern slavery risk questionnaire.
 - development and publication of a RACGP Modern Slavery Policy.

Closing Statement

The RACGP is proud of the achievements delivered in 2022 during a time of significant transformation and disruption to the organisation. We are committed to continuously improving the management of our Modern Slavery risks, and we acknowledge that as we have just commenced our journey there is much work to be done. We look forward to delivering our 2023 plan against the Modern Slavery framework and demonstrating further actions undertaken in our commitment to addressing this important issue of Modern Slavery.

This report was approved by the Board of RACGP on 7th December 2022.



Dr Larissa (Lara) Roeske
Chair, RACGP Board of Directors



RACGP