

# Modern Slavery Statement

Reporting Entity: Northern Queensland Primary Healthcare Network Limited

ACN: 605 757 640

ABN: 35 605 757 640

Reporting Period: Financial year ending 30 June 2025



*NQPHN acknowledges the Aboriginal and Torres Strait Islander peoples as Australia's First Nation Peoples and the Traditional Custodians of this land. We respect their continued connection to land and sea, country, kin, and community. We also pay our respect to their Elders past, present, and emerging as the custodians of knowledge and lore.*



ISO 9001  
QUALITY





## Contents

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Contents .....	2
Statement .....	3
Structure.....	3
Operations.....	3
Supply Chain .....	3
Operational Suppliers .....	4
Commissioned Service Providers .....	4
Modern Slavery Risks.....	5
Modern Slavery Risk Actions.....	5
Endorsement and Signature .....	6





## Statement

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This statement covers the activities of Northern Queensland Primary Healthcare Network Limited (NQPHN) to understand and implement actions to minimise the risk of modern slavery and human trafficking in its operations and supply chain. This is the first Modern Slavery Statement for NQPHN, as informed by the Modern Slavery Act 2018 (Cth). The purpose of this Statement is to outline our approach to assess and address the risk of modern slavery in our business operations and supply chain.

## Structure

NQPHN is an Australian not-for-profit public company limited by guarantee, incorporated, and domiciled in Australia under the Corporations Act 2001 (Cth) with its registered office at Level 5, 111 Grafton St, Cairns Qld 4870.

NQPHN is:

- registered as a charity with the Australian Charities and Not-for-Profits Commission;
- classified as a Health Promotion Charity under the Income Tax Assessment Act 1997 (Cth);
- endorsed as a Deductible Gift Recipient (DGR); and
- endorsed for GST, Income Tax and FBT tax concessions.

NQPHN has approximately 91.81 full-time equivalent employees and has offices in Cairns, Townsville and Mackay.

NQPHN's income for 2024/25 was \$104.42 million, the majority of which is disbursed to community-based commissioned service providers to provide a range of primary health services to vulnerable populations in North Queensland. NQPHN does not own or control any other legal entities and no other legal entities control or own NQPHN.

## Operations

Established in 2015, NQPHN is the lead organisation working to improve healthcare in local communities in Northern Queensland. NQPHN's core functions are to:

- coordinate and integrate local health care services in collaboration with local Hospital and Health Services (HHSs) to improve quality of care, people's experience, and efficient use of resources;
- commission and contract manage primary care and mental health services to address population health needs and gaps in service delivery and to improve access and equity; and
- capacity-build and provide practice support to primary care and mental health providers to support quality care delivery.

There are 31 PHNs created by the Australian Government's national PHN program in 2015. Further information on PHNs can be found at: <https://www.health.gov.au/our-work/phn>. NQPHN undertakes its operations in Australia and almost exclusively in Northern Queensland.

## Supply Chain

NQPHN's supply chain can be characterised as having three distinct elements. These are:

- **Employees:** persons that NQPHN employs.

- **Operational Suppliers:** suppliers of goods and services that enable it to conduct its operational activities; and
- **Commissioned Service Providers:** organisations that it commissions (contracts and provides funding to) to provide primary health services.

### Operational Suppliers

Operational Suppliers are typically utilised to support general operations, provide professional services or technology equipment and services. Examples of each of these categories are included below:

General Operations	Professional Services	Technology
General operational good and services including: <ul style="list-style-type: none"> <li>• Leased offices and vehicles,</li> <li>• Office furniture,</li> <li>• Consumables,</li> <li>• Cleaning,</li> <li>• Catering,</li> <li>• Venue hire,</li> <li>• Printing,</li> <li>• Promotions,</li> <li>• Fit-out, and</li> <li>• Minor maintenance.</li> </ul>	Consultants who provide services to NQPHN in a variety of areas including: <ul style="list-style-type: none"> <li>• Information technology management,</li> <li>• Software development and implementation,</li> <li>• Systems, processes and strategy development,</li> <li>• Communications and branding,</li> <li>• Website design,</li> <li>• Audit and accounting services,</li> <li>• Legal services, and</li> <li>• Program development and evaluation.</li> </ul>	Technology enabling goods and services including: <ul style="list-style-type: none"> <li>• Hardware (desktop and laptop computers, mobile devices, peripherals, etc),</li> <li>• Server and networking equipment,</li> <li>• Software,</li> <li>• Cloud computing, and</li> <li>• IT helpdesk and support services.</li> </ul>

### Commissioned Service Providers

NQPHN receives funding, primarily from the Federal and State Government, for the purpose of commissioning essential primary health services across NQPHN's region. The key funding priorities for NQPHN as determined by the Department of Health, Disability and Aging are:

- Mental health
- Aboriginal and Torres Strait Islander health
- Population health
- Health workforce
- Digital health
- Aged care; and
- Alcohol and other drugs.

NQPHN follows a structured commissioning procurement process to source providers against the identified service requirements. Successful candidates become Commissioned Services Providers (CSP) and encompass a diverse range of organisations, including large national entities (e.g., universities, health insurers, corporate general practice groups, and not-for-profits) as well as smaller, regionally focused providers, such as local community health organisations and general practices.

Each CSP operates with its own workforce, contractors, and supply chains. While their primary role is service delivery, their operational supply chains may include procurement of goods and services critical to their operations, such as:

- Medical and clinical consumables (e.g., pharmaceuticals, diagnostic tools).
- Property and facilities (e.g., building leases and maintenance).
- General operational goods and services (e.g., vehicles, staff uniforms, IT equipment).

## Modern Slavery Risks

NQPHN is a single business entity with operations primarily located in Northern Queensland and a supply chain that is predominately domestic to Australia with limited exposure to countries and industries with heightened modern slavery risk factors. As such, NQPHN's overall exposure to modern slavery risk for the year ended 30 June 2025 is low. Additional risk context is provided against each sourcing locations in the table below:

Sourcing Location	Risk Types	Product or Services Impacted
Australia	Excessive overtime	Professional services NQPHN employees
Australia	Migrant labour exploitation	Contracted services, including cleaning, maintenance waste disposal and security.
Australia	Forced labour	Office supplies, apparel and furniture.

## Modern Slavery Risk Actions

NQPHN is committed to addressing modern slavery risks within its operations and supply chains. This commitment is demonstrated through existing processes and the implementation of new initiatives aimed at strengthening its risk management framework.

### Processes Already in Place

- **Robust HR, WHS, and Compliance Frameworks**  
NQPHN has established comprehensive Human Resources (HR), Work Health and Safety (WHS), and compliance processes to ensure the fair, safe, and ethical treatment of employees.
- **Structured Procurement Processes**  
Procurement activities are conducted through structured processes designed to promote transparency, fairness, and accountability.
- **Standardised Contracts**  
Standardised contract templates are used to require suppliers to comply with all relevant laws and regulations, ensuring baseline legal and ethical practices.
- **Modern Slavery Procedure**



NQPHN has a formal modern slavery procedure to provide a consistent and systematic approach to identifying, assessing, monitoring, and addressing modern slavery risks across its operations and supply chains.

### Processes Being Implemented

- **Modern Slavery Contract Terms**

Specific modern slavery clauses are being incorporated into standard contract templates to strengthen supplier obligations and reinforce NQPHN's commitment to addressing modern slavery risks.

- **Modern Slavery Questionnaire**

A modern slavery questionnaire is being integrated into procurement processes to enhance supplier due diligence and gather information about suppliers' policies and practices.

### Assessing the Effectiveness of Modern Slavery Risk Actions

NQPHN has implemented the following processes to assess the effectiveness of its actions in identifying and mitigating modern slavery risks:

- **Contract Performance Management**

All CSPs are subject to structured performance management processes. These include regular engagement between NQPHN and each provider to review service delivery, contractual obligations, and any issues that may indicate modern slavery risks.

- **Complaints and Incidents Management Processes**

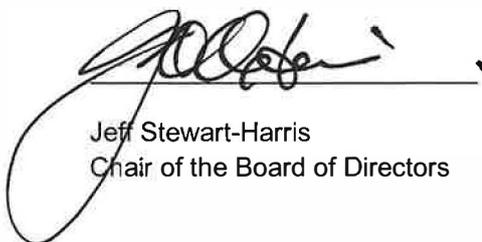
NQPHN maintains robust mechanisms for stakeholders to lodge complaints and report incidents. These processes support anonymity where requested, and ensure that all matters are reviewed, investigated, and resolved in a consistent and thorough manner.

- **Independent Audit Processes**

NQPHN engages both internal and external audit services to assess key business processes, including those relevant to modern slavery risk management. These audits evaluate process effectiveness, identify non-compliance, and recommend improvements for management action.

### Endorsement and Signature

This Statement was approved by the Board of Directors of Northern Queensland Primary Healthcare Network Limited, its principal governing body, on **Wednesday 17 December 2025**.



Jeff Stewart-Harris  
Chair of the Board of Directors

