



NACCHO
National Aboriginal Community
Controlled Health Organisation

Modern Slavery Statement For 30 June 2025

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Message from our CEO

As the CEO of NACCHO, I am honoured to present our second Modern Slavery Statement. This year's Statement builds on the foundations laid in our first, reaffirming NACCHO's enduring commitment to upholding human rights and addressing the ongoing impacts of modern slavery across all aspects of our operations and supply chains.

NACCHO is the national peak body representing Aboriginal and Torres Strait Islander peoples, advocating for their rights, health, and wellbeing, and empowering communities to lead their own solutions. Our commitment to combating modern slavery is grounded not only in legal compliance with the Modern Slavery Act 2018 (Cth), but in our deep responsibility to ensure fairness, dignity, and respect for all peoples.

We continue to acknowledge the profound irony in requiring Aboriginal and Torres Strait Islander organisations to report against modern slavery. For many of our Elders and communities, slavery is not a distant concept, it is part of our lived history. The legacy of stolen wages, blackbirding, and forced labour remains within living memory for many Aboriginal and Torres Strait Islander families and communities. This shared experience gives us a unique perspective and an enduring commitment to ensuring such injustices are never repeated.

Over the past year, NACCHO has strengthened its governance and processes to identify, assess and address risks of modern slavery in our operations and supply chains. This includes enhancing due diligence practices, working closely with our suppliers and Affiliates, and supporting the Aboriginal Community Controlled Health Organisations (ACCHOs) that deliver critical health services across the country.

We have also continued to raise awareness and build capability across the sector, supporting ACCHOs to understand their obligations and the importance of ethical procurement and fair labour practices. These actions reflect our broader vision, that every part of our sector operates with integrity, transparency, and cultural respect.

Modern slavery is complex and evolving, but through shared learning and collective action, we can drive meaningful change. NACCHO remains committed to continuous improvement, open dialogue with our stakeholders, and collaboration with government, community, and industry partners to uphold ethical practices and protect vulnerable people from exploitation.

I extend my gratitude to the NACCHO Board, leadership team, and employees for their ongoing commitment to this important work, and to our ACCHOs and partners who walk alongside us in advancing justice, equity, and cultural safety. Together, we will continue to lead with integrity and ensure that the principles of freedom and fairness remain central to everything we do.

Pat Turner
Chief Executive Officer
NACCHO

1 Introduction

- 1.1. This Modern Slavery Statement (“**Statement**”) is made by the National Aboriginal Community Controlled Health Organisation (**NACCHO**), the national peak body representing Aboriginal Community Controlled Health Organisations (**ACCHOs**) across Australia. It has been prepared in accordance with the Modern Slavery Act 2018 (Cth) for the financial year ended 30 June 2025. This is NACCHO’s second Modern Slavery Statement, demonstrating our continued commitment to identifying, managing, and mitigating modern slavery risks within our operations and supply chains.
- 1.2. As the national voice for Aboriginal and Torres Strait Islander peoples in health, NACCHO’s mission is grounded in advancing the rights, wellbeing, and self-determination of our communities. We recognise that our commitment to social justice extends beyond healthcare delivery, it includes ensuring that the way we operate, procure, and partner is free from exploitation and coercion.
- 1.3. Building on the foundations established in our first Statement, NACCHO continues to strengthen its approach to human rights and ethical governance. We acknowledge the unique position of Aboriginal and Torres Strait Islander peoples, many of whom have lived experiences of historical practices akin to slavery, and we are deeply committed to ensuring that these injustices are never repeated in any form.
- 1.4. This Statement outlines the steps NACCHO has taken during FY2025 to prevent and address modern slavery risks within our operations and those of our suppliers and partners. It highlights our progress in embedding ethical procurement processes, enhancing supplier due diligence, and raising awareness across the Aboriginal Community Controlled Health sector. Our goal is to continue building a culture of accountability, equity, and respect, ensuring that human rights remain central to all aspects of our work.

2 Our structure, operations, and supply chains

2.1 Our Structure and Operations

- 2.1.1 NACCHO is the national peak body for Aboriginal and Torres Strait Islander health in Australia, providing advice and guidance to the Australian Government on policy and budget matters while advocating for community-developed health solutions that contribute to the quality of life and improved health outcomes for Aboriginal and Torres Strait Islander people.
- 2.1.2 NACCHO represents 148 Aboriginal Community Controlled Health Organisations (**ACCHOs**) across Australia. ACCHOs provide 3.1 million episodes of care a year for 410,000 people across Australia, including about one million episodes of care in remote regions.
- 2.1.3 As a registered charity operating as a company limited by guarantee, NACCHO operates under a formal constitution, as well as meeting its legal obligations under the Corporations Act and other legislation.
- 2.1.4 NACCHO’s head office is based in Canberra, ACT, with 148 ACCHOs operating throughout Australia.
- 2.1.5 NACCHO is guided by a Board of Directors, with the Chair and Deputy elected by its members to embody the principle of community control. The Board exercises its powers vested in it by the Corporations Act 2001. The Chief Executive Officer and the senior executive team manage and coordinate the operations of the organisation.

2.2 Our Supply Chain

2.2.1 As of 30 June 2025, NACCHO employed 114 staff members to support its national operations and management of health related programs across Australia.

2.2.2 Our supply chain supports the effective delivery of NACCHO’s operations, programs, and advocacy activities. It includes the procurement of a diverse range of goods and services such as professional and consulting services, office and IT equipment, technology and software support, travel and accommodation, uniforms and promotional items, and essential operational support services (including auditing, insurance, and legal).

2.2.3 During FY25, NACCHO’s supply chain comprised the following categories;

Category	Percentage of Spend	Percentage of Suppliers
Health-Related Grant Services *	93%	27%
Contractor/Consultant	5%	24%
Equipment Hire	< 1%	2%
Insurance	< 1%	2%
IT Devices & Software	< 1%	2%
Legal Services	< 1%	< 1%
Licence fees	< 1%	< 1%
Postage	< 1%	< 1%
Purchasing Goods and Program Resources	1%	9%
Recruitment Expenses	< 1%	2%
Scholarship	< 1%	2%
Staff Amenities	< 1%	< 1%
Staff training	< 1%	2%
Stationery Payments	< 1%	< 1%
Subscriptions	< 1%	< 1%
Travel Allowances	1%	21%
Utility	< 1%	2%
Workshop and Venue Expenses	1%	5%

* *Health-Related Grant Services refers to contractual agreements with ACCHOs and affiliated partners to deliver holistic, comprehensive, and culturally appropriate healthcare and programs to Aboriginal and Torres Strait Islander communities. This may include medical supplies, healthcare delivery, community health education, and related support services.*

2.2.4 NACCHO engages a mix of preferred long-term suppliers, short-term suppliers for specific projects, and one-off suppliers for ad hoc needs. These relationships are managed through transparent procurement processes designed to ensure fairness, accountability, and compliance with NACCHO’s procurement policies and ethical sourcing expectations.

2.2.5 All of NACCHO’s **direct suppliers are based in Australia**. However, we acknowledge that some of these suppliers may source goods or services from international supply chains where modern slavery risks can exist. NACCHO expects all suppliers to manage their operations and supply chains in accordance with our **Modern Slavery Supplier Code of Conduct** and to uphold internationally recognised human rights principles, including those outlined in the **UN Universal Declaration of Human Rights** and the **UN Guiding Principles on Business and Human Rights**.

- 2.2.6 In FY25, NACCHO continued to improve its understanding of modern slavery risks within its first-tier suppliers. Over the coming reporting periods, we aim to extend our due diligence activities beyond the first tier of our supply chain to gain greater visibility of upstream risks and strengthen our ability to take preventative action where required.

3 Our Workplace

- 3.1. NACCHO is committed to upholding and promoting human rights, dignity, and respect for all employees, contractors, and partners. We recognise that our strength lies in our people and the communities we serve. Our workplace culture is built on fairness, inclusivity, and integrity, consistent with the principles of self-determination and respect for Aboriginal and Torres Strait Islander peoples.
- 3.2. We ensure full compliance with Australian labour laws, workplace relations standards, and ethical employment practices, as well as broader human rights principles. This includes adhering to the Fair Work Act 2009, Work Health and Safety laws, and anti-discrimination legislation, and aligning with community expectations of equity and accountability in all aspects of our operations.
- 3.3. NACCHO maintains zero tolerance for forced labour, human trafficking, child labour, slavery, servitude, or any other form of exploitation or abuse. We are committed to providing fair remuneration, safe working conditions, and access to benefits consistent with industry standards. This expectation extends to all individuals acting on NACCHO's behalf, including employees, contractors, consultants, suppliers, and service providers.
- 3.4. NACCHO promotes a culture that is free from discrimination, bullying, harassment, and intimidation, and upholds these standards through our Employee Code of Conduct and supporting workplace policies. We take all allegations of misconduct or human rights violations seriously and respond promptly through fair and transparent processes.
- 3.5. In FY25, NACCHO continued to strengthen its workplace practices through initiatives designed to enhance inclusion, wellbeing, and ethical leadership. Key actions included delivering targeted training on ethical procurement and human rights awareness, and enhancing employee wellbeing supports through tailored programs and resources.
- 3.6. These initiatives reflect NACCHO's commitment to continuous improvement and our ongoing responsibility to model fair, transparent, and culturally safe employment practices across all levels of the organisation.

4 Our policies and governance framework

- 4.1 NACCHO upholds the highest standards of corporate governance to ensure that our operations are ethical, transparent, and accountable. Our Board and Board Committees provide strategic leadership and oversight, ensuring governance practices are embedded throughout the organisation to promote integrity, sustainability, and long-term success in serving Aboriginal and Torres Strait Islander communities.
- 4.2 The NACCHO Governance Framework integrates all key policies, procedures, and oversight mechanisms that guide decision-making and internal control. It ensures consistency, accountability, and compliance with legislative obligations, while reflecting our values of respect, collaboration, and community-led governance.
- 4.3 Our governance framework is supported by policies in key areas, including;
- Employee Code of Conduct
 - Fraud and Corruption Management Plan

- Delegation of Authority Policy
 - Risk Management Framework
 - Management of Grievances Policy
 - Whistleblower Policy
 - Procurement Policy
- 4.4 NACCHO promotes a culture of openness and accountability. We encourage employees and stakeholders to speak up about any concerns — particularly those involving ethical, legal, or human rights issues. Concerns can be raised directly with management, or through confidential reporting channels under our Whistleblower Policy or Management of Grievances Policy. We ensure that all reports are managed promptly, fairly, and without fear of reprisal.
- 4.5 In FY25, NACCHO continued to strengthen governance maturity by reviewing key frameworks including risk management, procurement, and legal processes to ensure alignment with modern slavery and broader ethical compliance requirements. Oversight of these frameworks and related compliance initiatives rests with the Audit and Assurance Committee (AAC), which reports directly to the Board. This reinforces NACCHO’s commitment to continuous improvement, robust risk management, and accountability to the communities we serve.

5 Risk of Modern Slavery in Our Operations and Supply Chains

5.1 Modern Slavery risks in our operations

- 5.1.1 In assessing modern slavery risks within our operations, NACCHO considered the potential for our organisation to cause, contribute to, or be directly linked to modern slavery through our business activities and relationships. This assessment considered:
- The risk that NACCHO’s operational or procurement practices may directly result in, or contribute to, modern slavery practices.
 - The risk that NACCHO’s suppliers, contractors, or other third parties may engage in modern slavery within their operations or supply chains.
 - The risk that NACCHO’s operations, goods, or services may be connected to modern slavery through indirect relationships, including those with business partners or subcontractors.
- 5.1.2 Given NACCHO’s operations are wholly based in Australia, our geographic exposure to modern slavery is assessed as low, consistent with findings from the Global Slavery Index. The risk of modern slavery occurring within our direct workforce also remains low due to NACCHO’s strong governance, compliance with the Fair Work Act 2009 (Cth), National Employment Standards, and robust workplace policies that uphold human rights and fair labour practices.
- 5.1.3 Nevertheless, NACCHO recognises that risks may exist indirectly, particularly in areas involving outsourced services, technology supply, promotional goods, and facility-related services that may rely on global supply chains. We continue to apply a precautionary and proactive approach to identifying and managing these risks through supplier due diligence, contractual controls, and engagement with vendors.
- 5.1.4 Our policies and governance measures, as outlined in **Section 4**, are designed to reinforce a culture of integrity and accountability. This includes regular employee training, strengthened procurement oversight, and mechanisms for employees and suppliers to report concerns confidentially. These initiatives collectively mitigate potential modern slavery risks and ensure NACCHO’s ongoing compliance with human rights obligations.

5.2 Modern Slavery risks in our supply chains

- 5.2.1 NACCHO recognises that while our direct operations are low risk, there remains potential for indirect exposure to modern slavery and human trafficking through our supply chains. We are committed to understanding and addressing these risks to ensure that the goods and services we procure are sourced ethically and responsibly.
- 5.2.2 Our most salient risks arise within procurement categories that are traditionally recognised as higher risk for modern slavery due to sector characteristics, complex supply chains, or reliance on low-cost labour and raw materials. These risks may emerge at multiple tiers of the supply chain, particularly where goods are sourced internationally or through multiple subcontractors.
- 5.2.3 Examples of higher-risk categories include:
- Clothing and promotional materials (uniforms, branded items), where global manufacturing may involve forced or underpaid labour.
 - Cleaning and facilities services, which can carry elevated labour exploitation risks.
 - IT equipment and consumables, where electronic components or raw materials may originate from regions with limited labour protections.
 - Freight, catering, and travel services, where temporary or migrant labour may be present.
- 5.2.4 NACCHO is particularly mindful of the potential exploitation of Indigenous peoples, both within Australia and globally. We maintain a strong focus on culturally safe, ethical procurement that supports Aboriginal and Torres Strait Islander businesses, and we actively seek to partner with suppliers that demonstrate social and ethical integrity.
- 5.2.5 As part of our ongoing improvement approach in FY26, NACCHO will continue to strengthen supplier due diligence, enhance data collection on supplier practices, and engage with vendors to reinforce awareness of human rights and modern slavery risks across all tiers of the supply chain.

6 Actions Taken to Address Modern Slavery

NACCHO recognises that modern slavery and human trafficking are serious violations of human rights and continue to pose a significant global and domestic challenge. Consistent with our commitment to ethical leadership, cultural integrity, and respect for human dignity, we have taken proactive steps to identify, prevent, and address modern slavery risks within our operations and supply chains.

6.1 In our operations

- 6.1.1 All NACCHO employees are engaged directly by the organisation, significantly reducing the risk of modern slavery within our workforce. We maintain full compliance with Australian employment and workplace laws, including the Fair Work Act 2009 and relevant industrial instruments.
- 6.1.2 A robust due diligence process is undertaken for all new employees. This includes structured recruitment, verification of credentials, background and reference checks, and confirmation of legal working rights in Australia.
- 6.1.3 NACCHO's employment practices uphold fair remuneration, safe working conditions, and compliance with minimum wage and overtime legislation. All employment conditions are consistent with the jurisdiction in which employees operate.
- 6.1.4 We provide comprehensive onboarding, induction, and ongoing training to ensure employees understand NACCHO's values, cultural principles, and ethical standards. Health, safety, and wellbeing training are integral components of this process.

6.1.5 Through our Code of Conduct and supporting workplace policies, we promote a culture that encourages respect, accountability, and transparency. Employees are empowered to report unethical behaviour or potential human rights concerns through accessible and confidential channels.

6.2 In our supply chain

6.2.1 NACCHO continues to strengthen its supplier due diligence processes. We assess suppliers for compliance with legal, ethical, and human rights standards, and expect all suppliers to adhere to our **Modern Slavery Supplier Code of Conduct** and **Modern Slavery Framework**.

6.2.2 During FY25, NACCHO undertook a comprehensive review and mapping of its supplier base, analysing key spend categories and service criticality. This exercise supports better oversight by categorising suppliers according to their modern slavery risk exposure and ensuring proportionate due diligence is applied.

6.2.3 We prioritise suppliers who share our values, particularly Aboriginal and Torres Strait Islander, owned businesses and who can demonstrate ethical and sustainable practices. Where risks are identified, we engage directly with suppliers to promote continuous improvement and transparency.

6.2.4 NACCHO will continue to build capability across procurement and contract management teams to embed human rights considerations in supplier selection, evaluation, and ongoing management.

6.2.5 If modern slavery risks or breaches are identified, NACCHO will work collaboratively with the relevant supplier to develop corrective action plans, report material findings to the Audit and Assurance Committee, and, where necessary, terminate contracts in accordance with procurement and legal protocols.

6.3 Measuring Effectiveness

6.3.1 NACCHO assesses the effectiveness of its actions to address modern slavery risks through several mechanisms:

- Annual review of procurement practices and supplier compliance with the Supplier Code of Conduct and Modern Slavery Framework.
- Annual reporting to the Audit and Assurance Committee and the Board on progress against modern slavery commitments.
- Periodic reassessment of supplier risk categories to identify areas for improvement.

6.3.2 These measures ensure NACCHO continually improves its approach and demonstrates accountability in managing modern slavery risks.

7 Looking Ahead

7.1 In FY26, NACCHO remains committed to strengthening its approach to addressing modern slavery through continuous improvement and deeper integration of ethical practices across all areas of operation.

7.2 We recognise that building capability, consistency, and awareness across our organisation and within our supply chains is essential to sustaining meaningful progress in preventing modern slavery risks.

7.3 Our goal is to continue embedding modern slavery and human rights considerations into NACCHO's business culture, governance processes, procurement frameworks, and day-to-day operations ensuring that these principles are not standalone compliance requirements but part of how we do business.

7.4 In FY26, our focus will be on delivering and expanding upon the commitments and progress made in FY25, including:

Commitment	Status	Comments
Modern Slavery Policy	●	<p>NACCHO finalised and formally adopted its Modern Slavery Policy, which applies to all employees, contractors, and suppliers.</p> <p>The Policy reinforces NACCHO’s commitment to ethical practices and requires suppliers who are reporting entities under the Act to provide a copy of their Modern Slavery Statement upon request.</p> <p>The Modern Slavery Policy is also available on the NACCHO website, along with the the FY24 Modern Slavery Statement.</p>
Supplier Code of Conduct for Procurement	●	<p>The Supplier Code of Conduct has been finalised and embedded into supplier agreements. The Code requires suppliers to self-certify compliance through a due diligence questionnaire and outlines expectations for adherence to human rights and fair labour standards.</p>
Supplier Due Diligence Framework	●	<p>NACCHO has mapped its supplier base by key spend categories and service criticality to identify suppliers requiring enhanced due diligence.</p> <p>Risk categorisation and monitoring activities will continue to evolve as part of procurement improvements in FY26.</p>
Employee and Board Awareness Training	●	<p>Modern Slavery awareness training has been delivered to Board members, senior executives, procurement teams, and employees to strengthen understanding of modern slavery risks, reporting obligations, and ethical procurement practices.</p>
Modern Slavery Contract Clauses	●	<p>Supplier contracts and tender templates have been reviewed and updated to include explicit modern slavery clauses addressing ethical sourcing, supplier accountability, and audit rights.</p>
Assess and engage with at-risk suppliers	●	<p>NACCHO assessed the high risk suppliers, engaging with suppliers to obtain information on their supply and production processes relevant to modern slavery risk.</p> <p>NACCHO will continue to assess other at-risk (medium and low)suppliers for information on its supply and production processes relevant to modern slavery as deemed required by the Modern Slavery Framework.</p>

Commitment	Status	Comments
Engagement with ACCHOs	●	NACCHO will engage with ACCHOs to share Modern Slavery FAQs and build understanding of modern slavery risks and mitigation strategies across the ACCHO network.

● : Complete

● : On-Going or Partly Complete

● : Not Yet Commenced

8 Consultation and Engagement

- 8.1 NACCHO does not own or control any other entities.
- 8.2 This Statement was developed through consultation with NACCHO’s Board of Directors, Audit and Assurance Committee, executive leadership team, and key staff involved in procurement and governance.
- 8.3 Looking ahead, NACCHO will maintain ongoing consultation with ACCHOs and the wider Aboriginal and Torres Strait Islander communities to incorporate their perspectives on modern slavery risks and ensure our strategies are culturally informed and responsive to their expectations. We will also collaborate with other organisations, industry bodies, and government agencies to strengthen collective efforts in preventing and addressing modern slavery.

9 Approval and Sign Off

- 9.1 This Modern Slavery Act Statement was approved by the NACCHO Board of Directors on **25 November 2025** and is signed on its behalf by the two members of the Board.
- 9.2 This Statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth).



Name: Donnella Mills
Chair of the Board

3 December 2025



Name: Tri Nguyen
Company Secretary

3 December 2025