



Australian Government



Commonwealth
**Modern Slavery
Statement 2024–25**

Acknowledgements

We acknowledge Aboriginal and Torres Strait Islander peoples as custodians of Australia and pay our respects to Elders, past and present. We also acknowledge the ongoing connection to land, sea and communities throughout Australia, and the contributions to the lives of all Australians.

We acknowledge the victims and survivors of modern slavery crimes.

We also acknowledge and thank everyone who works tirelessly to combat these crimes, including people with lived experience.

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Commonwealth
**Modern Slavery
Statement 2024–25**

Foreword

Attorney-General



Modern slavery is a global problem which requires combined efforts across government, business and civil society to embed enduring change.

I am proud to present our sixth Commonwealth Modern Slavery Statement, which covers the actions of 103 non-corporate Commonwealth entities in the 2024–25 reporting period to assess and address modern slavery in the Commonwealth's operations and supply chains. The Commonwealth is leading by example by setting out a comprehensive modern slavery statement in accordance with the *Modern Slavery Act 2018* (Cth) (the Modern Slavery Act).





This Commonwealth statement marks the final year of the 6-year reporting cycle, reporting on the progress we've made since the Modern Slavery Act came into force.

In the last 6 years, the Australian Government has made significant improvement in strengthening its management of modern slavery risk. We have enhanced our procurement processes, developed and incorporated the prevention of modern slavery into the Commonwealth Supplier Code of Conduct. We have also provided training to procurement officers and decision makers to recognise modern slavery and developed tools to engage effectively with suppliers and respond to instances of modern slavery.

The Government is further building on these achievements through its 2022 *Tackling Modern Slavery* election commitment. An audit of the Australian Government's procurement procedures and supply chains for modern slavery risk has commenced. The audit will not only provide a scorecard of our purchasing practices, but more importantly, it will deepen our understanding and mature our risk management framework to help improve the livelihoods of people in Australian supply chains.

On 7 November 2024, the Government appointed Mr Chris Evans as the inaugural Anti-Slavery Commissioner for a 5-year term commencing on 2 December 2024, as an independent pillar of the Government's response. I commend the Commissioner on his productive engagement with business, civil society and academia to support collaboration, build community awareness and support victims of modern slavery during his first year in office.

In December 2024, the Government published its response to the statutory review of the Act undertaken by Professor John McMillan AO. In implementing the Government's response, the Attorney-General's Department is conducting extensive stakeholder consultations on options to further strengthen our domestic response and drive further action to address modern slavery in global supply chains and operations.

Together we will continue to strive to strengthen Australia's response to modern slavery and ensure that modern slavery has no place in the goods and services the Australian Government procures.

A handwritten signature in blue ink that reads "Michelle Rowland". The signature is fluid and cursive, with a large, stylized 'M' and 'R'.

The Hon Michelle Rowland MP
Attorney-General of Australia
December 2025

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Executive summary

This Commonwealth Modern Slavery Statement (Commonwealth Statement) published pursuant to the Modern Slavery Act describing the actions taken to identify, assess and address risks of modern slavery in the Commonwealth's operations and supply chains during the 2024–25 Australian financial year (reporting period).

The Commonwealth Statement covers all non-corporate Commonwealth entities (NCEs), within the meaning of the *Public Governance, Performance and Accountability Act 2013* (Cth) (PGPA Act). During the reporting period, there were 103 NCEs as listed in the table on page 10, representing the arrangement of portfolios as they stood for majority of the reporting period.

The Commonwealth continues to be a significant procurer of a vast range of goods and services in the Australian market. During the reporting period, there were 86,926 contracts published on AusTender,¹ with a combined value of \$104.9 billion across 543 categories of goods and services. Of the \$104.9 billion, \$92.60 billion was contracted with Australian suppliers.

The Commonwealth continued its targeted risk-based approach to addressing modern slavery, with the Attorney-General's Department developing and overseeing the roll-out of frameworks and tools to address modern slavery risks, such as the modern slavery e-Learning modules and the *Modern Slavery Toolkit for Government Procurement Officers* (Modern Slavery Toolkit). These tools and frameworks are integrated into the broader Commonwealth procurement framework, whole-of-government

arrangements, and training, to guide NCEs on managing modern slavery risk in public procurement.

During the reporting period, at a whole-of-government level, the 5 high-risk areas of focus remained: information and communications technology (ICT) hardware, cleaning and security services, investments, textiles, and construction.

This Commonwealth Statement marks the final phase in the Commonwealth's 6-year reporting strategy: the review phase. The review assesses the effectiveness of the Commonwealth's actions since the establishment of the Modern Slavery Act.

The Commonwealth has made significant progress in managing modern slavery risk, primarily through its procurement and contract management activities. There remains opportunity to further embed modern slavery risk management within enterprise risk management frameworks under the PGPA Act so that responses to modern slavery risk are embedded within NCEs' operations and decision-making processes.

In this reporting period, the Australian Government allocated funding of \$2.5 million to undertake an audit of Commonwealth procurement procedures and supply chains. The audit will be completed in 2026.

The findings of the review phase, supply chain audit, and the upcoming evaluation of Australia's *National Action Plan to Combat Modern Slavery 2020–25*, will help inform the future strategic focus and initiative to enhance the Commonwealth's response to modern slavery risk.

Continuous learning and improvement

Key actions included in this Commonwealth Statement:

- Establishing an audit to assess the likelihood of modern slavery risk exposure within Commonwealth supply chains, analyse the source of any modern slavery risks and explore practical ways to better trace modern slavery risks in Commonwealth supply chains.
- Embedding modern slavery awareness raising and training into numerous relevant Commonwealth events, training programs and resources to increase outreach.
- Collaborating with international and domestic counterparts to increase engagement on modern slavery risk in public procurement.
- Working across the Commonwealth to integrate responses to modern slavery in supply chains into NCE's existing governance structure and processes.
- Evaluating the actions taken over the past 6 years to manage modern slavery risk, as a part of the review phase of the Commonwealth's reporting cycle to drive continuous improvement.

¹ AusTender is the Australian Government's procurement information system. NCEs are required to report details of contracts with a value of \$10,000 or more, and prescribed CCEs report contracts with a value of \$400,000 or more.

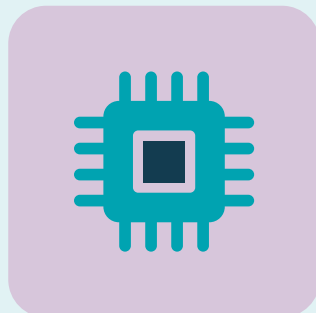
How this statement addresses the mandatory reporting criteria in the *Modern Slavery Act 2018* (Cth)

Mandatory reporting requirement	Section in the Commonwealth Statement where the requirement is addressed	Page
Paragraph 16(1)(a) Identify the reporting entity.	Section 1: Covered entities, structure, operations, and supply chains	8
Paragraph 16(1)(b) Describe the structure, operations and supply chains of the reporting entity.	Section 1: Covered entities, structure, operations, and supply chains	8
Paragraph 16(1)(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	Section 2: Whole-of-government overview and Section 3: Input from Government portfolios	19 and 37
Paragraph 16(1)(d) Describe the actions taken by the reporting entity and any entity the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Section 2: Whole-of-government overview and Section 3: Input from Government portfolios and parliamentary departments	19 and 37
Paragraph 16(1)(e) Describe how the reporting entity assesses the effectiveness of such actions.	Section 2: Whole-of-government overview and Section 3: Input from Government portfolios and parliamentary departments	19 and 37
Paragraph 16(1)(f) Describe the processes of consultation with (i) any entities that the reporting entity owns or controls and (ii) for a reporting entity covered by a joint statement, the entity giving the statement.	Section 4: Consultation	111
Paragraph 16(1)(g) Include any other information that the reporting entity considers relevant.	Section 5: Related activities	113



Section 1

Covered entities, structure,
operations and supply chains



This section identifies the Commonwealth as the reporting entity and describes the structure, operations and supply chains of the Commonwealth, as required by paragraphs 16(1)(a) and (1)(b) of the Modern Slavery Act.

Australian Government's structure and Commonwealth Statement coverage

Section 15 of the Modern Slavery Act requires the Minister to prepare a modern slavery statement for the Commonwealth, for a reporting period, covering all NCEs within the meaning of the PGPA Act.



Administrative Arrangements Order – 13 May 2025

This Commonwealth Statement covers all NCEs and their structures during the 2024–25 Australian financial year prior to the making of a new Administrative Arrangements Order (AAO) on 13 May 2025. Changes to portfolio responsibilities made in the AAO will be reflected in the next reporting period.

Non-corporate Commonwealth entities

NCEs are legally and financially part of the Commonwealth of Australia. An NCE is defined under the PGPA Act as “a Commonwealth entity that is not a body corporate”. This includes parliamentary departments, Departments of State and listed entities.

This Commonwealth Statement covers 103 NCEs. In this reporting period, there were 99 NCEs arranged into 15 portfolios, and 4 parliamentary departments that do not sit within a portfolio but are classified as NCEs. Information on the structure of each portfolio is provided in **Section 3**.

Corporate Commonwealth entities and Commonwealth companies

Corporate Commonwealth entities (CCEs) and Commonwealth companies are not covered by Commonwealth Statements. CCEs and Commonwealth companies with annual consolidated revenue of at least \$100 million for the reporting period are required by the Modern Slavery Act to submit their own annual modern slavery statements.



List of non-corporate Commonwealth entities during the reporting period (103)

Agriculture, Fisheries and Forestry

- Department of Agriculture, Fisheries and Forestry
- Australian Fisheries Management Authority

Attorney-General's

- Attorney-General's Department
- Administrative Review Tribunal
- Australian Crime Commission (Australian Criminal Intelligence Commission)
- Australian Federal Police
- Australian Financial Security Authority
- Australian Institute of Criminology
- Australian Law Reform Commission
- Australian Security Intelligence Organisation
- Australian Transaction Reports and Analysis Centre (AUSTRAC)
- Federal Court of Australia
- National Anti-Corruption Commission
- Office of the Australian Information Commissioner
- Office of the Commonwealth Ombudsman
- Office of the Director of Public Prosecutions (CDPP)
- Office of the Inspector-General of Intelligence and Security
- Office of Parliamentary Counsel
- Office of the Special Investigator

Climate Change, Energy, the Environment and Water

- Department of Climate Change, Energy, the Environment and Water
- Bureau of Meteorology
- Clean Energy Regulator
- Climate Change Authority
- Great Barrier Reef Marine Park Authority

Defence

- Department of Defence
- Australian Signals Directorate
- Australian Submarine Agency
- Department of Veterans' Affairs

Education

- Department of Education
- Australian Research Council
- Tertiary Education Quality and Safeguards Agency

Employment and Workplace Relations

- Department of Employment and Workplace Relations
- Asbestos and Silica Safety and Eradication Agency
- Australian Skills Quality Authority (National Vocational Education and Training Regulatory)
- Fair Work Commission
- Office of the Fair Work Ombudsman
- Safe Work Australia
- Seafarers Safety, Rehabilitation and Compensation Authority (Seacare Authority)

Finance

- Department of Finance
- Australian Electoral Commission
- Digital Transformation Agency
- Future Fund Management Agency
- Independent Parliamentary Expenses Authority
- Parliamentary Workplace Support Service

Foreign Affairs and Trade

- Department of Foreign Affairs and Trade
- Australian Centre of International Agriculture Research (ACIAR)
- Australian Secret Intelligence Service
- Australian Trade and Investment Commission (Austrade)

Health and Aged Care

- Department of Health and Aged Care
- Aged Care Quality and Safety Commission
- Australian National Preventive Health Agency (ANPHA)
- Australian Radiation Protection and Nuclear Safety Agency (ARPANSA)
- Cancer Australia
- National Blood Authority
- National Health and Medical Research Council (NHMRC)
- National Mental Health Commission
- National Health Funding Body (NHFB)
- Office of the Inspector-General of Aged Care
- Organ and Tissue Authority
- Professional Services Review
- Sport Integrity Australia

Home Affairs

- Department of Home Affairs
- National Emergency Management Agency

Industry, Science and Resources

- Department of Industry, Science and Resources
- Geoscience Australia
- IP Australia

Infrastructure, Transport, Regional Development, Communications and the Arts

- Department of Infrastructure, Transport, Regional Development, Communications and the Arts
- Australian Communications and Media Authority (ACMA)
- Australian Transport Safety Bureau (ATSB)
- National Archives of Australia
- National Capital Authority

Prime Minister and Cabinet

- Department of the Prime Minister and Cabinet
- Australian National Audit Office
- Australian Public Service Commission
- National Indigenous Australian Agency
- Net Zero Economy Authority
- Office of National Intelligence
- Office of the Official Secretary to the Governor-General
- Workplace Gender Equality Agency

Social Services

- Department of Social Services
- Australian Institute of Family Studies (AIFS)
- Domestic, Family and Sexual Violence Commission
- National Commission for Aboriginal and Torres Strait Islander Children and Young People
- NDIS Quality and Safeguards Commission
- Services Australia

Treasury

- Department of the Treasury
- Australian Bureau of Statistics
- Australian Competition and Consumer Commission (ACCC)
- Australian Office of Financial Management (AOFM)
- Australian Prudential Regulation Authority (APRA)
- Australian Securities and Investments Commission (ASIC)
- Australian Taxation Office
- Commonwealth Grants Commission
- Inspector-General of Taxation
- National Competition Council
- Office of the Auditing and Assurance Standards Board (AUASB)
- Office of the Australian Accounting Standards Board (AASB)
- Productivity Commission
- Royal Australian Mint

Parliamentary Departments

- Department of Parliamentary Services
- Department of the House of Representatives
- Department of the Senate
- Parliamentary Budget Office

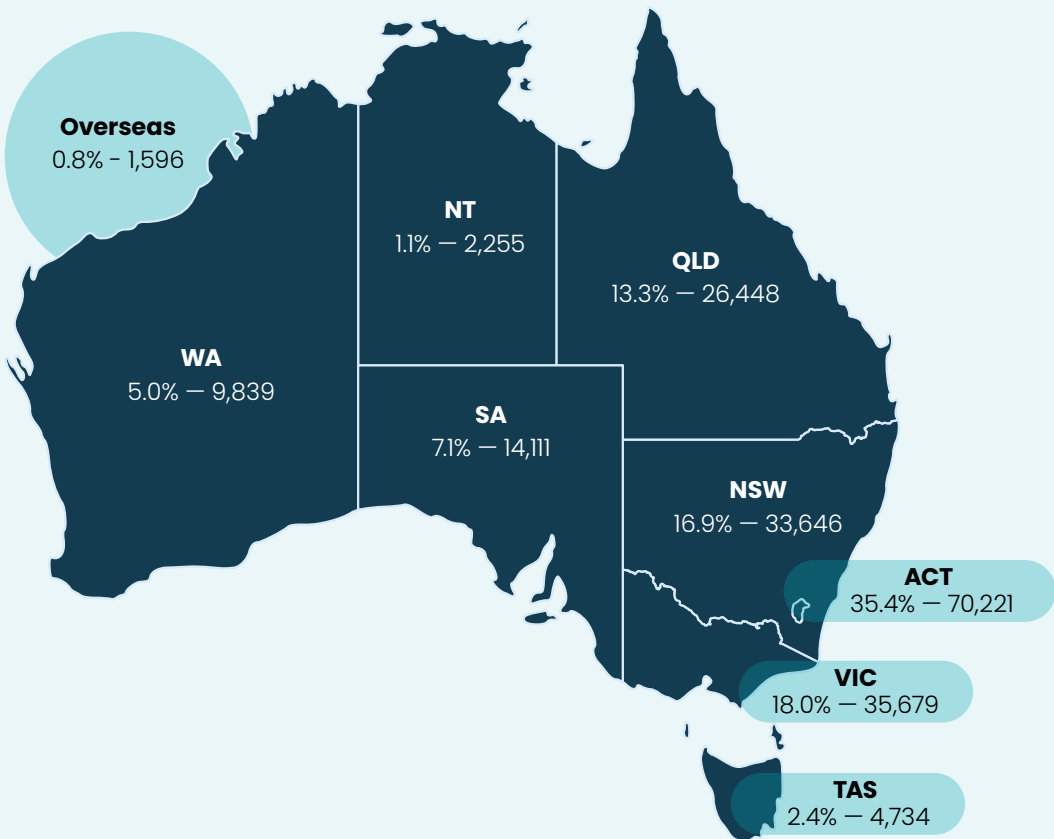
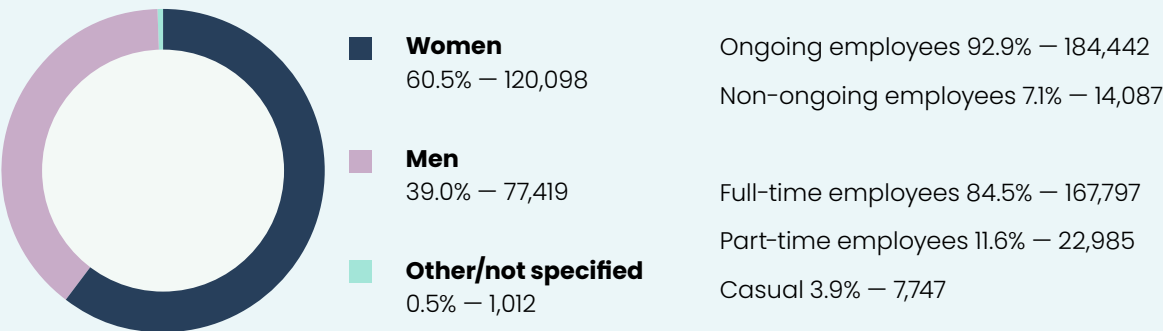
Australian Government's operations

Operations refer to activity undertaken by an entity to pursue its business objectives and strategy. Executive responsibility is allocated through the AAO, which specifies the matters dealt with by each department and the legislation administered by each minister.

The responsibilities of the Australian Government include developing, implementing and administering national policies and legislation, enforcing the law, making important decisions on behalf of Australians, and representing Australia overseas.

NCEs operationalise these matters through program implementation, service delivery, regulatory and enforcement functions, working in collaboration with civil society partners, peak bodies and state and territory governments. The Australian Government may acquire goods and services from external service providers to assist in achieving these objectives.

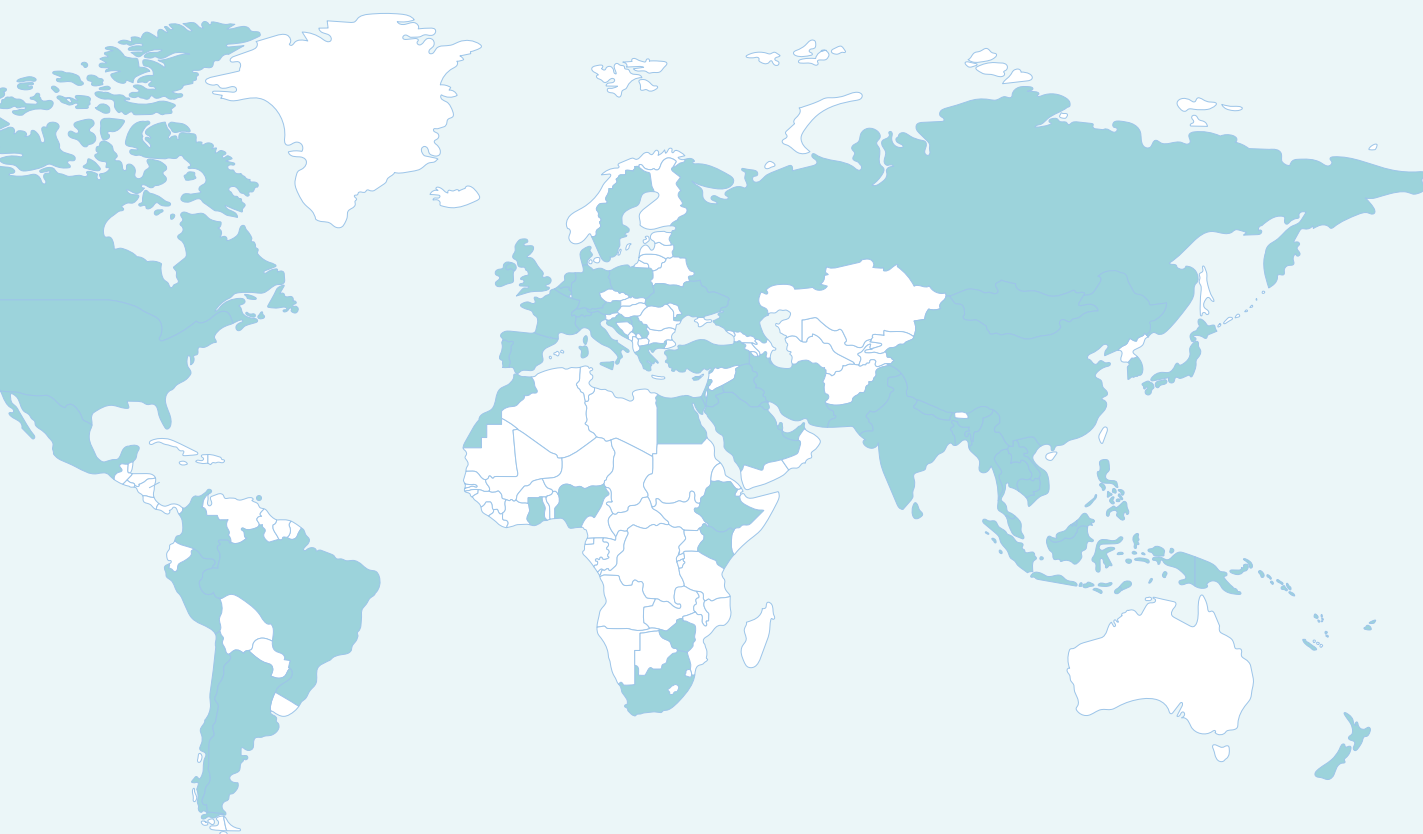
APS Employment as at 30 June 2025



The Australian Government may also administer grants in compliance with the Commonwealth Grants Rules and Principles 2024 to help address one or more of the Australian Government's policy outcomes while assisting the grantee achieve its objectives. Types of grants may include, but are not limited to, research grants; grants that provide for the delivery of services such as health services and legal services; grants that help fund infrastructure; or grants that help build capacity.

Throughout the reporting period, the Australian Government employed 198,529² Australian Public Service staff under the *Public Service Act 1999* (Cth) (Public Service Act).

■ Activities in 86 countries/territories



DFAT and Austrade locations overseas, as at 30 June 2025

Argentina, Austria, Bangladesh, Belgium, Brazil, Brunei Darussalam, Cambodia, Canada, Chile, China, Colombia, Cook Islands, Croatia, Cyprus, Denmark, Egypt, Ethiopia, Federated States of Micronesia, Fiji, France, French Polynesia (France), Germany, Ghana, Greece, India, Indonesia, Iran, Iraq, Ireland, Israel, Italy, Japan, Jordan, Kenya, Kiribati, Republic of Korea, Kuwait, Laos, Lebanon, Malaysia, Maldives, Malta, Marshall Islands, Mauritius, Mexico, Mongolia, Morocco, Myanmar, Nauru, Nepal, Netherlands, New Caledonia (France), New Zealand, Nigeria, Niue, Pakistan, Palau, Papua New Guinea, Peru, Philippines, Poland, Portugal, Qatar, Russia, Samoa, Saudi Arabia, Serbia, Singapore, Solomon Islands, South Africa, Spain, Sri Lanka, Sweden, Switzerland, Thailand, Timor-Leste, Tonga, Trinidad and Tobago, Türkiye, Tuvalu, Ukraine, United Arab Emirates, United Kingdom, United States of America, Vanuatu, Vatican City, Vietnam, Zimbabwe.

² Note: This figure is indicative. Not all Commonwealth employees are employed under the Public Service Act. The employees of 11 NCEs are employed under separate enabling legislation. The employees of 18 CCEs and Commonwealth Companies not covered by this statement are employed under the Public Service Act.

Commonwealth supply chains

The Commonwealth is one of the largest procurers in the Australian market, purchasing a diverse range of products and services each year. The Commonwealth's supply chains vary greatly in size and complexity, and include products and services sourced in Australia and overseas.

As reported in the *Commonwealth Modern Slavery Statement 2022–23*, supply chain mapping of a sample of 50 Tier 1 government ICT hardware suppliers indicated a supplier network of more than 64,000 sub-tier suppliers to the Tier 4 level, which were located across the United States, China, Germany, India and Hong Kong.

The Commonwealth's supply chains encompass, but are not limited to:

- products provided to NCEs by direct suppliers
- services provided to NCEs by direct suppliers
- products and services used by indirect suppliers in the NCE's supply chains
- products and services used by grant recipients to deliver grant agreements.

The Commonwealth's supply chains may be exposed to modern slavery risks, and the risks vary across industries based on factors such as:

- sector and industry
- product and service
- geographic locations
- supply chain model.

Government information systems

GrantConnect is the Whole of Australian Government (WoAG) grant information system. NCEs must report information on individual grants on GrantConnect within 21 calendar days after the grant agreement takes effect. Information on grants awarded are publicly available on the [GrantConnect website](#).

AusTender is the Australian Government's procurement information system. NCEs are required to report on contracts valued over \$10,000 GST inclusive on the AusTender website with 42 calendar days, unless there is an exemption under the Commonwealth Procurement Rules (CPRs). AusTender provides visibility over the Commonwealth's direct suppliers. From 1 July 2024, AusTender reporting methodology was enhanced to require entities to also report all amendments which either increase or decrease a contract by \$10,000 GST inclusive or more. Information on contracts above \$10,000 GST inclusive awarded to suppliers are publicly available on the [AusTender website](#).

A snapshot of procurement activities during the reporting period



6.22%
by volume
(5,408) contracts

11.73%
by value
(\$12.3 billion)
of suppliers
located overseas³



103
non-corporate
Commonwealth
entities covered
by AusTender data



\$18.7b
of contracts awarded
to small to medium
enterprises



543
AusTender
categories



86,926
contracts entered
into, with a total value
of \$104.9 billion



72.53%
of contracts for
services, with
a value of
\$77.9 billion

27.47%
of contracts
were for goods,
with a value of
\$27 billion



93.78%
Australian
suppliers
(by volume)

88.27%
Australia
suppliers
(by value)

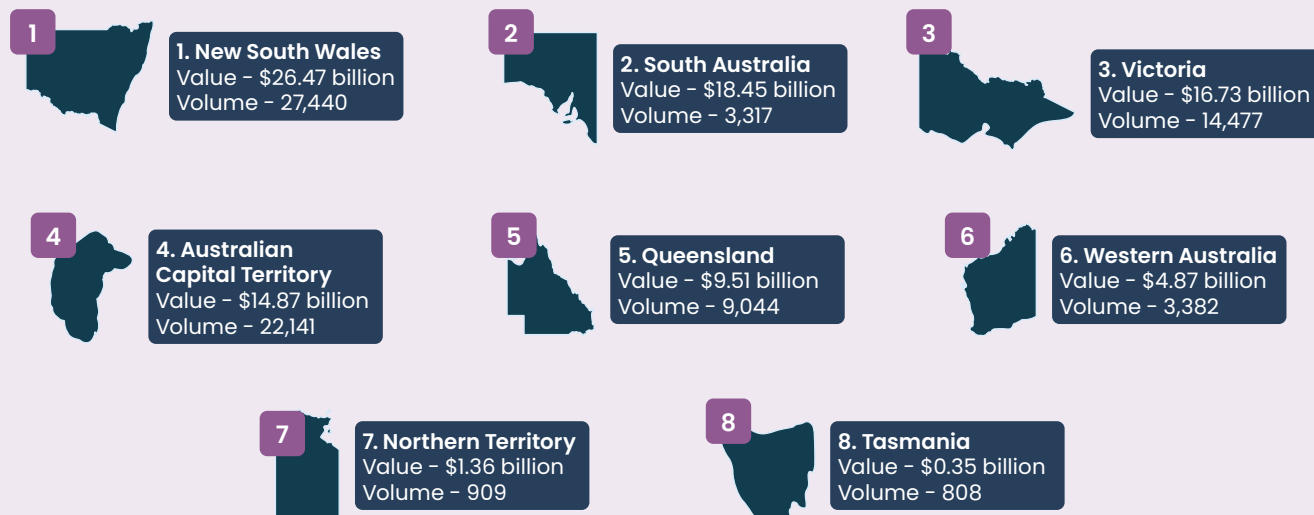
³ Supplier location does not reflect whether it is an Australian-owned business, as AusTender does not collect this information. In addition, overseas questions are non-mandatory on AusTender. For 2024–25, 87.62% of contracts by value indicated whether the goods or services were procured or used overseas.

Top 20 categories for goods and services during the reporting period*

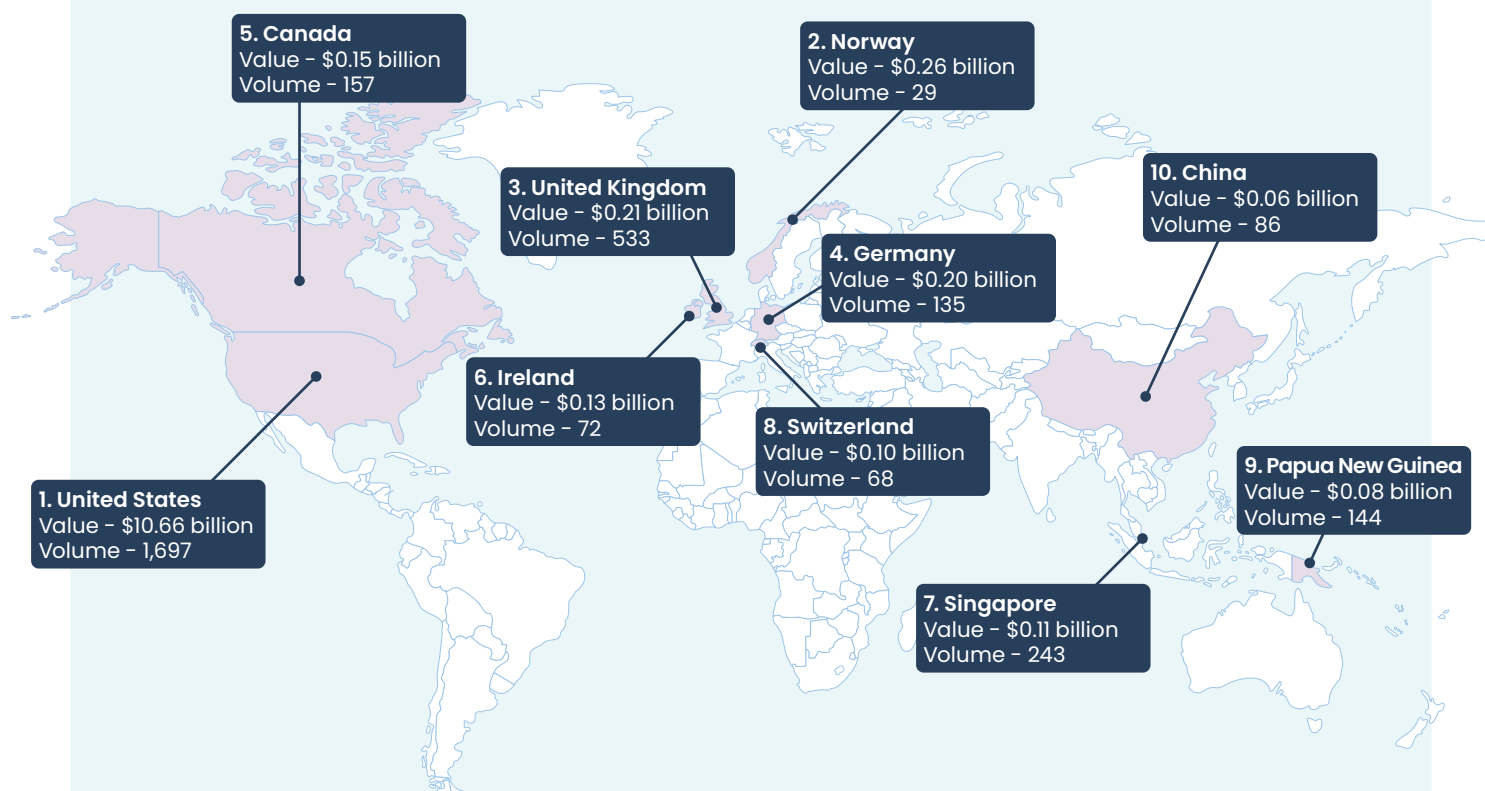
Category	Value	Value %	Volume	Volume %
1) Professional engineering services	\$14.2 billion	13.58%	736	0.85%
2) Building construction and support and maintenance and repair services	\$10.4 billion	9.91%	3,301	3.80%
3) Conventional war weapons	\$6.5 billion	6.17%	48	0.06%
4) Military services and national defence	\$6.3 billion	5.99%	316	0.36%
5) Comprehensive health services	\$5.4 billion	5.12%	742	0.85%
6) Computer services	\$4.5 billion	4.31%	6,515	7.49%
7) Management support services	\$4.3 billion	4.09%	2,655	3.05%
8) Employment services	\$2.9 billion	2.81%	211	0.24%
9) Temporary personnel services	\$2.3 billion	2.23%	7,733	8.90%
10) Marine craft systems and subassemblies	\$1.9 billion	1.81%	1,167	1.34%
11) Military fixed wing aircraft	\$1.8 billion	1.69%	50	0.06%
12) Travel facilitation	\$1.7 billion	1.64%	41	0.05%
13) Management advisory services	\$1.7 billion	1.64%	3,000	3.45%
14) Individual health screening and assessment services	\$1.7 billion	1.61%	126	0.14%
15) Education and Training Services	\$1.7 billion	1.58%	4,174	4.80%
16) Lease and rental of property or building	\$1.5 billion	1.42%	1,734	1.99%
17) Missiles	\$1.5 billion	1.41%	44	0.05%
18) Components for information technology or broadcasting or telecommunications	\$1.4 billion	1.32%	1,200	1.38%
19) Communications devices and accessories	\$1.3 billion	1.27%	421	0.48%
20) Software	\$1.3 billion	1.24%	2,360	2.71%

* Based on contracts reported to AusTender during the reporting period

Location of government suppliers by state and territory



Top 10 overseas government suppliers by country



Audit of the Commonwealth's procurement procedures and supply chains

In 2024–25, the Australian Government allocated \$2.5 million over 2 years to undertake an audit of Commonwealth procurement procedures and supply chains to ensure the Australian Government is leading by example and not importing goods made from forced labour.

The audit will assess the likelihood of modern slavery risk exposure within Commonwealth supply chains, analyse the source of any modern slavery risks and explore practical ways to better trace modern slavery risks in Commonwealth supply chains.

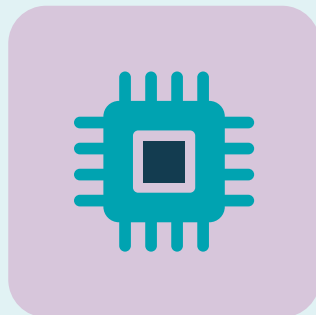
During this reporting period, the Attorney-General's Department, in close consultation with the Department of Finance, the Digital Transformation Agency, and the Department of Defence, developed the scope of the audit and prepared to approach the market to identify a supplier to undertake the audit.

The audit is due to be completed in 2026, and the findings of the audit will be published in the Commonwealth Modern Slavery Statement 2025–26.



Section 2

Whole-of-government overview



This section describes the Commonwealth's risks and actions at a whole-of-government level in accordance with paragraphs 16(1)(c) and (d) of the Modern Slavery Act and describes how the reporting entity assesses the effectiveness of such actions pursuant to paragraph 16(1)(e) of the Modern Slavery Act.

Risks

The Commonwealth assesses and mitigates risks of modern slavery in its operations and supply chains both at a whole-of-government, and at individual NCE level.

In 2024–25, at a whole-of-government level, the 5 high-risk areas of focus remained: ICT hardware, cleaning and security services, investments, textiles, and construction.

The Commonwealth reinforced its 'person at the centre' approach to assessing and mitigating modern slavery risk in its operations and supply chains, focussing on the risk to people affected by modern slavery, rather than the risk to the entity.

At a whole-of-government level, the Attorney-General's Department, as the domestic policy lead on Australia's response to modern slavery, continued to develop and oversee frameworks and enabling tools, which are integrated into Commonwealth frameworks, policies, training and initiatives administered by other agencies to strengthen the Commonwealth's response to modern slavery.

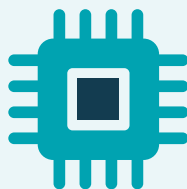
Frameworks include the Modern Slavery in Public Procurement e-Learning modules, the Modern Slavery Toolkit, and modern slavery tender and contract clauses.

Descriptions of NCE-level risks and their actions are set out in **Section 3**.

ICT hardware

ICT hardware procurements are associated with higher risk of modern slavery due to the large and complex nature of global ICT hardware supply chains. In 2021, the Commonwealth engaged Electronics Watch to undertake a modern slavery risk assessment for Commonwealth ICT hardware procurement activities.

The assessment indicated that key inputs such as minerals, metals, plastics, and glass, as well as processes such as mining and semiconductor back-end chip manufacturing, are at high risk for modern slavery. Multi-tiered supply chains, especially those spanning multiple countries, can obscure the origin of goods and services, making it harder to detect and address potential exploitation.



Over this reporting period, the Australian Government entered into contracts for ICT hardware to a total value of

\$2.3 billion.

Of this, \$80 million (3.48%) was awarded to suppliers with an overseas address and \$6.6 million (0.29%) was procured and used overseas.

The Digital Transformation Agency (DTA) manages the Hardware Marketplace, which is a WoAG coordinated procurement arrangement. NCEs are mandated to procure desktop personal computers, mobile personal computers, virtual desktop devices, monitors, printers, scanners, and multifunction devices through the Hardware Marketplace.

There are 204 approved suppliers on the Hardware Marketplace. Other types of ICT hardware may be procured via the Hardware Marketplace or other procurement methods that align with the Commonwealth Procurement Framework.

Noting the risks associated with ICT hardware, the DTA has implemented several measures within the Hardware Marketplace as well as other ICT panels, arrangements, and marketplaces to combat modern slavery.

- The DTA uses the Modern Slavery Toolkit to assess risks of modern slavery, considering factors such as sector and industry, products and services, geographic locations, and supplier history. For example, the DTA evaluates submissions to the marketplace based on a set criterion, which includes the degree to which applicants have appropriate strategies in place to identify and address risks of modern slavery in their supply chains and workforce.
- The DTA engages with sellers by hosting modern slavery information sessions. It also has factsheets available to sellers via its BuyICT portal to educate them and provide accurate information on DTA's contractual requirements.
- Sellers who contract on DTA's marketplaces and panels, or arrangements with contracts with an annual value of at least \$100 million, are required to provide evidence of their registered modern slavery statement(s). These statements provide DTA with visibility of the actions the seller is taking to identify, assess, and address risks of modern slavery in their global operations and supply chains.
- The DTA continues to enhance its BuyICT portal to deliver improved buyer and seller user experiences. The DTA also constantly seeks to uplift its contract terms and conditions as it refreshes relevant hardware-related panels, arrangements, and templates.
- The DTA continues to enhance and monitor its approach to supplier engagement and modern slavery compliance. The DTA actively attends events and provides guidance to stay abreast of global supply chain developments. The DTA regularly engages with Commonwealth stakeholders on supply chain issues and requires all tender responses to directly advise how they combat modern slavery.

NCEs across the portfolios have detailed their actions to manage risks in ICT hardware in **Section 3**.

Textiles

The textiles industry is globally recognised as a high-risk sector for modern slavery.

In 2021, Sedex assisted the Australian Border Force with a textiles and construction supply chain mapping report (2021 Sedex textiles and construction report). The report highlighted direct wholesale of textiles located in Australia are a relatively low risk industry as it will largely fall under the banner of professional services, where most employees are skilled office workers in low-risk environments.

However, there is significant risk in textiles manufacturing and finishing up the supply chain. The manufacturing of textiles industry has some key inherent risks for workers, which can create environments of forced labour. For example, long hours due to the prevalence of 'shift work', and low piecemeal rates for product produced.

There is also a risk of child labour in textiles supply chains, particularly where there is no or limited age verification of workers, significant subcontracting in the supply chain, or home working is common.



Over the reporting period, the Australian Government entered into new contracts for textiles with a total value of

\$69.6 million.

Of this, \$0.88 million (1.27%) was awarded to suppliers with an overseas address and \$0.06 million (0.09%) was produced and used overseas.

In 2023–24, the Attorney-General's Department commenced Phase 2 of the Supply Network Analysis Program with the aim to strengthen the management of identified risks of modern slavery by NCEs. Refer to the *Commonwealth Modern Slavery Statement 2023–24*.

During the reporting period, the Attorney-General's Department continued to progress this phase of work and conducted further consultations with relevant procurement officers and contract managers to support the development of modern slavery risk engagement tools, which can be tailored and integrated into NCEs' existing processes, including managing risks within textiles procurement and contract management activities. The Attorney-General's Department will progress these tools in a future reporting period.

Construction

Construction is recognised as a high-risk sector for modern slavery globally.

The 2021 Sedex textiles and construction supply chain mapping report indicated that responsible sourcing risks for construction in Australia are mostly low and medium risk. This is due to the strong presence and enforcement of laws in the country. Some areas are higher risk, such as health, safety and hygiene due to the prevalence of accidents and work-related injuries in the sector.

However, construction projects offshore and overseas raw materials in the construction supply chain pose an elevated risk of modern slavery practices. Sourcing materials and imported goods from overseas often involve complex supply chains and multiple tiers including contractors and subcontractors, resulting in limited visibility for property and construction companies over modern slavery risks.⁴



Over the reporting period, the Australian Government entered into contracts for construction projects to a total value of

\$10.4 billion.

Of this, \$56.3 million (0.54%) was awarded to suppliers with an overseas address and \$41.2 million (0.39%) was procured and used overseas.

During the reporting period, the Attorney-General's Department promoted and distributed the Responsible Sourcing Tool's Construction Sector Toolset at relevant forums to assist procurement officials/contract managers supporting construction projects to identify and manage risks of modern slavery practices.

The Department of Defence developed an expanded Modern Slavery Control Plan (MSCP) to address risks of modern slavery in more offshore defence infrastructure and international engagement activities in the Indo-Pacific region. The MSCP was showcased to Commonwealth officials, states and territory counterparts, and international partners at the International Contracting Officers Forum, hosted by the Government of Canada, to promote better practice.

⁴ [Property, construction & modern slavery: Practical responses for managing risk to people](#), Australian Human Rights Commission and KPMG Australia, accessed at 15 October 2025.

Cleaning and security services

Cleaning and security services continued to be a key risk area of focus for the Commonwealth.

In 2022, the Cleaning Accountability Framework undertook a modern slavery risk assessment of the Commonwealth's cleaning services. The report highlighted that cleaners in Australia may be subjected to exploitative treatment such as withholding of wages, dangerous and substandard working conditions, immigration-related coercion and threats, excessive overtime, and confiscation of personal and travel documents.

Over the reporting period, the Australian Government entered into new contracts for cleaning services with a total value of

\$52.5 million.

Of this, \$6.3 million (11.99%) was awarded to suppliers with an overseas address and \$7 million (13.4%) was procured and used overseas.



The vulnerability of workers in the cleaning industry to labour exploitation and modern slavery stems from a particular set of industry and workforce features including, but not limited to:

- complex supply chain structures, opaque and negligent contracting practices resulting in under-priced contracts
- subcontracting and labour hire
- human rights due diligence not performed by the lead firm or procurer
- insufficient resources allocated by lead firms and procurers to monitoring and enforcing compliance by cleaning contractors
- workers with low English language competency, lack of social networks, lack of knowledge about workplace rights, and very little power to obtain redress when they experience exploitation at work.

The Australian Government entered into new contracts for security services with a total value of

\$189.5 million.

Of this, \$11.6 million (6.11%) was awarded to suppliers with an overseas address and \$13.2 million (6.94%) was procured and used overseas.



Similarly, security services are commonly outsourced and contracted security service providers generally handle the recruitment of security personnel, often through multiple subcontracts. The vulnerability of workers may be elevated when workers experience multiple dependencies on their recruiters for their wages, visas, work permits, and/or housing.

In accordance with the WoAG Property Services Coordinated Procurement Arrangements (PSCP Arrangements), the Commonwealth's Property Service Providers (PSPs) are responsible for the procurement of cleaning and security services. The PSPs provide core leasing services and facilities management including cleaning services to NCEs and may also be procured to provide additional services such as security services, as negotiated between PSPs and any Commonwealth entity. The PSCP Arrangements are mandatory for all NCEs.

In 2024–25, the Commonwealth held contracts with the below PSPs:

- Ventia Property Pty Ltd (transition out to 30 June 2025)
- Cushman and Wakefield Pty Ltd (transition in from 1 January 2025)
- Evolve FM Pty Ltd
- Jones Lang LaSalle (JLL) (ACT) Pty Ltd.

The PSCP Arrangements provides a range of benefits, including the following modern slavery risk management benefits:

- robust governance processes and controls to ensure the integrity management activities
- requiring PSPs to seek approval and provide greater visibility of work that is subcontracted to downstream providers
- ensuring PSPs (and subcontracted entities) satisfy the terms and conditions of employment or engagement for engaging an external workforce, including the *Fair Work Act 2009* (Cth) (Fair Work Act), the National Employment Standards, and any applicable industrial award
- ensuring PSPs (and subcontracted entities) satisfy the training provisions for security guarding services
- ensuring PSPs (and subcontracted entities) provide appropriate diligence and equipment to support cleaning services.

The recent retendering of the PSCP Arrangements afforded the Commonwealth an opportunity to review and strengthen the current property management operating model. Enhancements have been built into the new PSCP Arrangements to improve transparency and accountability of PSPs and downstream contractors, including with respect to actions that each PSP must take to identify, assess, and address risks of modern slavery in their global operations and supply chains.

Engagement with downstream contractors through Property Services Providers

Under the PSPs' contracts with the Commonwealth, the PSPs are required to develop and maintain a Procurement and Downstream Contract Management Strategy (PDCMS), which defines the PSPs' approach to delivering procurement and subcontract management services. The PDCMS provides the Commonwealth with visibility over how the PSPs are planning, implementing and managing the outcomes of procurement activities and how they are complying with legislation, regulation and policies, including, but not limited to, mitigating modern slavery risks in the PSPs' supply chains and use of subcontracting. For example, PSPs undertake risk assessments before onboarding a subcontractor, audits of payment data, training and induction programs, annual reporting, and routine compliance checks to ensure adherence to the overarching agreement with the Commonwealth and the Modern Slavery Act.

PSPs are also bound by the requirements of the PSCP Arrangement's Head Agreement when procuring services on behalf of an entity. The PSPs regularly monitor vendors to ensure workers employed through downstream contracts are protected from modern slavery and other potential supply chain risks.

Investments



The Future Fund is Australia's sovereign wealth fund. The Future Fund is the Australian Government's single largest financial asset, strengthening the Commonwealth's long-term financial position.

The Future Fund Board of Guardians (the Board) is supported by the Future Fund Management Agency, and is responsible for investing 7 special purpose public asset funds:

- the Future Fund
- the Medical Research Future Fund
- the Aboriginal and Torres Strait Islander Land and Sea Future Fund
- the Future Drought Fund
- the Disaster Ready Fund; The DisabilityCare Australia Fund
- the Housing Australia Future Fund.

The Board operates independently from the Australian Government and tailors the management of each fund to its unique investment mandate. Collectively, these public asset funds total over \$318 billion. The Future Fund is the largest of these funds and was valued at \$252.3 billion on 30 June 2025.

The Board invests primarily through external investment managers, who invest on the Board's behalf both domestically and internationally, across public and private markets. Investments span various financial asset classes, including listed equities, private equity, tangible assets (such as property, infrastructure, and timberland), alternatives, cash, credit, and overlays.

While Australian-domiciled investments are generally regarded as lower-risk for modern slavery, certain sectors and industries present elevated risks, particularly where there is significant reliance on migrant, outsourced or low-skilled labour. This is especially relevant in the horticulture, cleaning, security, and building construction sectors.

Modern slavery risks can also be present in the supply chains of Australian-domiciled investments. These risks arise when raw materials or finished goods originate from high-risk industries or jurisdictions. For example, elevated supply chain risks are associated with textiles and apparel sourced from China, Bangladesh, Vietnam, India, Malaysia, Brazil, and Argentina; solar panels from China; electronics from China and Malaysia; and seafood from Thailand, China, Indonesia, Taiwan, and Ghana.

Across international investments, modern slavery risks are particularly heightened in emerging markets in Africa, Eastern Europe, South America and Asia. A breakdown of investments by geographic region is available in the Future Fund's 2024–25 Annual Report.

Sectors such as mining, agriculture, textiles and apparel, construction, industrial manufacturing, diversified support services, technology components, and artificial intelligence data collection and model training activities, may also carry increased exposure to modern slavery risks.

Integrating modern slavery into investment policies

Modern slavery considerations are embedded within the Board's Responsible Investment Policy, which is available on the Future Fund website.

The Investment Team's frameworks and approach provide robust guidance for the identification and management of environmental, social, and governance (ESG) risks, including modern slavery, across the investment portfolio. The Board seeks to ensure that modern slavery is specifically addressed in any new or amended investment management agreements, requiring investment managers to consider modern slavery as a material ESG matter in portfolio management.

The modern slavery risk assessments are undertaken at various stages of the investment cycle, including pre-investment due diligence, investment manager reviews, portfolio monitoring, and direct engagement activities.

These risk assessments and ongoing monitoring activities inform the selection of investment managers participating in the Future Fund's investment stewardship engagement and monitoring program.

Over the reporting period, modern slavery risks were specifically discussed with 18 prospective and existing investment managers across a number of asset classes, including infrastructure, listed equities, property, credit, alternatives, and private equity.

The Investment Team also undertook a targeted engagement program with Australian listed equities investment managers, aimed at deepening understanding of their approaches to modern slavery risk management and engagement practices. Each manager participated in meetings to discuss their methodologies, implementation activities, and the quality of modern slavery disclosures. These discussions also facilitated the sharing of insights on emerging governance practices related to modern slavery within the Australian Stock Exchange (ASX) context.

The Future Fund is invested in 9 large Australian infrastructure assets subject to the requirements of the Modern Slavery Act. These assets are diversified across industries, including ports, airports, transmission and renewable energy, timberland, data centres, telecommunications, and toll roads. The Future Fund Management Agency monitors the performance of each asset through regular reviews of modern slavery statements and ongoing engagement with management teams regarding their policies and approaches. There were no reports of actual or potential modern slavery by these Australian infrastructure assets during the reporting period.

In addition, the Investment Team continues to pursue strategic engagements with ASX-listed companies through the established investment stewardship program. Discussions on modern slavery are frequently incorporated into corporate governance meetings with ASX company Boards and sustainability specialists. During the year, modern slavery engagement activities were conducted with 29 different ASX companies spanning a range of sectors, including: materials, financials, healthcare, consumer staples, consumer discretionary, communication services, utilities, and industrials.

Annual review ASX modern slavery statements

The Future Fund maintains a strong commitment to addressing modern slavery risks in its investment activities and undertakes an annual review of select ASX-listed holdings.

During the year the Future Fund conducted a review of published modern slavery statements from 86 companies in its ASX-listed portfolio. This analysis highlighted variation in both approaches and progress toward addressing modern slavery risks.

The Future Fund seeks to recognise and positively reinforce transparency by acknowledging ASX-listed companies that identify and disclose actual or potential instances of modern slavery.

Some leading companies have moved beyond basic compliance to describe performance indicators and tangible outcomes, such as handling reports from whistle-blowers, rectifying instances of non-compliance, improving working conditions, and taking decisive measures when supply partners fall short of expectations. Initiatives to train and educate suppliers and collaborative efforts with industry peers have become increasingly common markers of sophisticated practice.

Reported incidences of modern slavery

Through the annual review, the Future Fund identified several incidences of modern slavery reported by ASX companies, including:

- 9 ASX companies disclosed actual incidences of modern slavery: Ansell, BlueScope Steel, Coles, Premier Investments, Rio Tinto, Super Retail Group, Wesfarmers, Westpac Bank, and Woolworths.
- 7 ASX companies reported potential incidences of modern slavery: BHP, Brambles, Coles, Commonwealth Bank, JB Hi-Fi, Qantas Airways, Westpac Bank, and Woolworths.

These incidences were disclosed in the respective companies' modern slavery statements and were investigated and addressed by the companies themselves, in line with their statutory obligations and established policies.

Where actual or potential cases of modern slavery are identified, the company is added to the Future Fund's strategic engagement program.

Measuring effectiveness

The Future Fund Management Agency reports to the Board annually on modern slavery-related activity. Annual disclosures are also made through the Commonwealth Statement and in the Board and the Future Fund Management Agency's public annual report. The effectiveness of modern slavery frameworks and actions is reviewed regularly through the Future Fund Management Agency's Modern Slavery implementation program.

Other actions and initiatives

In the reporting period, the Commonwealth continued to progress actions to respond to risks of modern slavery through 4 strategic areas of focus.

Strategic area of focus	Actions undertaken during this reporting period
Training and awareness raising activities	<ul style="list-style-type: none"> • The Modern Slavery in Public Procurement e-Learning modules were reviewed and updated for accessibility and consistency. <ul style="list-style-type: none"> – The updated e-Learning modules were uploaded on the Australian Public Service Academy Learning platform – APS Learn – and embedded in the Commonwealth Procurement and Contract Management Training Suite to improve availability and increase uptake by procurement officers and other APS staff. – A post-course evaluation survey was also developed for participants to provide feedback and track effectiveness of the e-Learning modules. – The Attorney General's Department delivered a national social media human trafficking awareness-raising campaign around World Day Against Trafficking in Persons. • The inaugural 2024 Commonwealth Procurement and Contract Management Conference, hosted by the Department of Finance, included a panel session setting out the responsibilities of procurement and contract managers to mitigate modern slavery risk in public procurement. • The Pathways to Procurement program, established by the Department of Finance to build the foundational skills of procurement officers, includes a session on modern slavery in procurement. Participants gained insights on the government's response to modern slavery risks, and how to manage modern slavery risk in the procurement and contract management lifecycle. • The Government continued to promote the <i>Principles to guide Government action to combat trafficking in global supply chains</i> by collaborating with Canada as the project lead to deliver the International Contracting Officers Forum 2025: Combating Human Trafficking in Government Procurements. The forum was the first of its kind, bringing together working-level procurement and contracting officers across the member countries (Australia, Canada, New Zealand, the United Kingdom, and the United States of America) to engage on the issue of modern slavery in public supply chains. The forum aimed to create a network for working-level officers responsible for implementing responsible sourcing policies, to expand knowledge and learn from international counterparts dealing with similar challenges.
Procurement and contract management processes	<ul style="list-style-type: none"> • Commonwealth Supplier Code of Conduct (the Supplier Code) came into effect in July 2024 and is mandated through the CPRs. NCEs and prescribed CCEs must incorporate the Supplier Code into all new Commonwealth forms of contract, unless exempted by the Accountable Authority. The Supplier Code outlines the minimum expectations of suppliers, their personnel and their subcontractors while under contract with the Commonwealth. This includes acting to prevent involuntary labour and human rights abuse, discrimination and harassment within supply chains, and supporting workforce diversity. • Entities have continued to incorporate due diligence into contract management processes. An example of this is actions taken by the Department of Climate Change, Energy, the Environment and Water, which worked with the Attorney-General's Department to develop a bespoke contract management tool to align with their Enterprise Risk Management framework. The tool contains a dashboard, which supports the contract manager to monitor the supplier's compliance against its obligations under the modern slavery provisions in the contract. The Complex Contract Management template is a proactive approach to ensuring staff continue to engage with the ongoing management of modern slavery risks.

Strategic area of focus	Actions undertaken during this reporting period
Supplier activities	<ul style="list-style-type: none"> • The Commonwealth progressed a modern slavery risk case study to draw insight and lessons from an NCE's experience in managing an alleged instance of modern slavery within a supply chain. The case study provided key learnings to be applied across the Commonwealth for future responses, including: <ul style="list-style-type: none"> – the importance of identification and visibility to allow for informed decision-making – implementing the right mechanisms during procurement and contract management to target different risk types – training employees to manage potential risks – responding with prompt and resolute action, communicating in a sensitive matter to maintain a collaborative approach. • The Attorney-General's Department presented at an ICT supplier briefing session hosted by the DTA on good practice reporting under the Modern Slavery Act and provided advice on managing risks in supply chains.
Response activities	<ul style="list-style-type: none"> • The Commonwealth progressed a framework to support NCEs with responding to instances of actual or perceived instances of modern slavery involving suppliers. The framework is designed to complement existing risk management processes within NCEs, while aligning with best practice guidance and the <i>United Nations Guiding Principles on Business and Human Rights</i>. The framework provides a proactive and tailored approach to responding to potential or actual instances of modern slavery. • The Attorney-General's Department progressed the development of a remediation toolkit for business as an action item under the <i>National Action Plan to Combat Modern Slavery 2020–25</i>. The draft toolkit is based on existing best practices, including academic research, existing guidance and case studies to make it relevant for businesses of different sizes and centre lived experience. The Toolkit will provide guidance material for businesses to consider when developing their modern slavery remediation policy and to improve pathways to effective remediation, which may be leveraged by NCEs, where necessary.

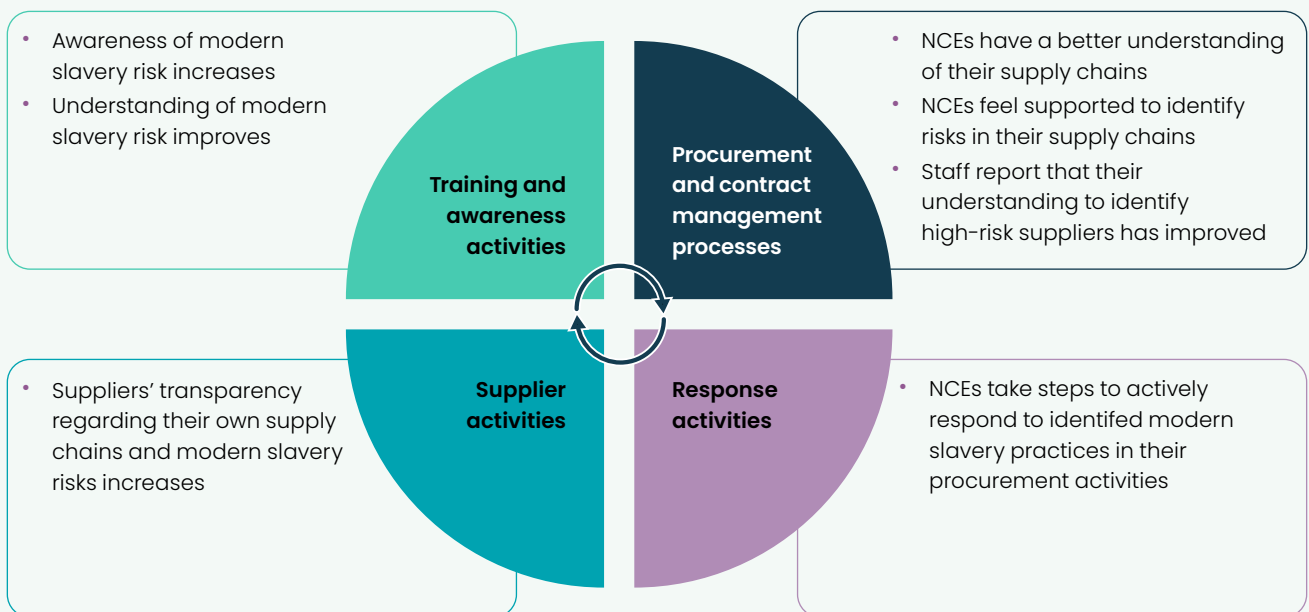
Measuring effectiveness

The Commonwealth develops and measures the effectiveness of its actions to address modern slavery risk against a Performance Review Framework (the Performance Framework) developed by the Australian Institute of Criminology (AIC) in 2022, in consultation with the Interdepartmental Committee on Modern Slavery in Public Procurement (IDCP). The Performance Framework sets out a logical suite of actions, key performance indicators and outcomes across 4 strategic areas of focus:

- training and awareness-raising activities
- procurement and contract management processes
- supplier activities
- response activities.

A summary of the Performance Framework is outlined below, with a more extensive overview available in the *Commonwealth Modern Slavery Statement 2021–22*.

Each year the Commonwealth considers the progress of its actions to address modern slavery against the Performance Framework. Since 2022, data has been collected annually from NCEs on the utilisation of the tools within the Modern Slavery Toolkit.



Action Items	Key indicators during this reporting period (*as at 8 July 2025)
Training and awareness-raising activities	<ul style="list-style-type: none"> • The Commonwealth's consolidated Modern Slavery Toolkit has been downloaded a total of 44,962 times* from the Modern Slavery Statements Register. The educational video on modern slavery in the cleaning industry has 1,386* total views. • The Attorney-General's Department delivered 4 tailored capacity-building training sessions with individual agencies and provided e-Learning modules to 8 NCEs for use on internal learning and development platforms during the reporting period. • 14% of NCEs reported that modern slavery training was mandatory for procurement officials, while 57% of NCEs reported that staff were encouraged to undertake modern slavery training.
Procurement and contract management processes	<ul style="list-style-type: none"> • The Commonwealth's model modern slavery contract clauses have been downloaded 26,995 times* from the Modern Slavery Statements Register. • The Commonwealth's model modern slavery tender clauses and guidance have been downloaded 10,622 times* from the Modern Slavery Statements Register. • 69% of NCEs reported use of the model modern slavery contract clauses in the reporting period and 68% of NCEs reported use of the model modern slavery tender clauses in the reporting period.
Supplier activities	<ul style="list-style-type: none"> • The Supplier Questionnaire has been downloaded a total of 46,139 times* from the Modern Slavery Statements Register • 25% of NCEs reported use of the Supplier Questionnaire in the reporting period.
Response activities	<ul style="list-style-type: none"> • Within the Future Fund's ASX listed portfolio: <ul style="list-style-type: none"> – 9 ASX companies disclosed actual incidences of modern slavery – 7 ASX companies reported potential incidences of modern slavery. <p>These incidences were disclosed in the respective companies' modern slavery statements and were investigated and addressed by the companies themselves, in line with their statutory obligations and established policies. Where actual or potential cases of modern slavery are identified, the company is added to the Future Fund's strategic engagement program. See pages 26–27 for more information.</p>

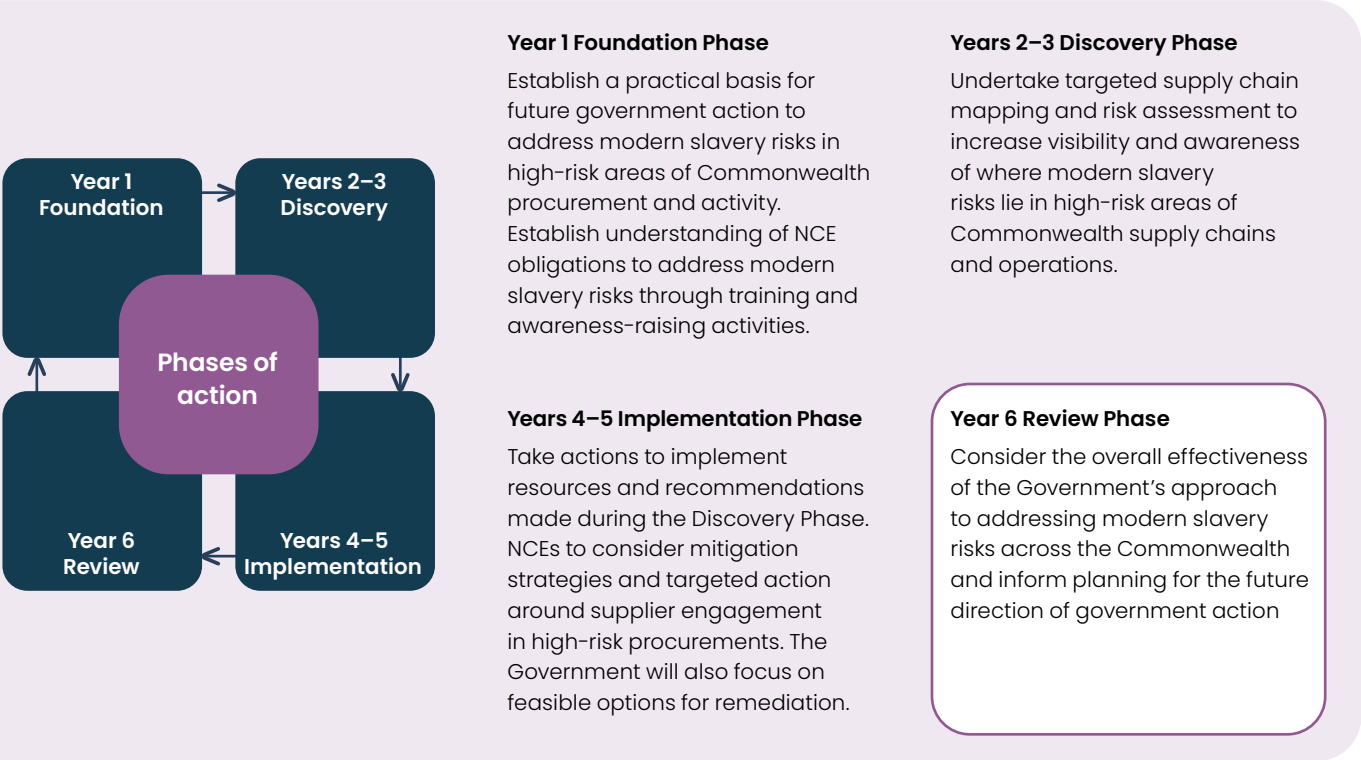
Review Phase

To drive continuous improvement in its approach to addressing modern slavery risk, the Australian Government committed to 4 phases of action across a 6-year reporting cycle. Beginning in 2019, each annual Commonwealth Statement has been developed in line with the 4 phases of action: foundation; discovery; implementation; and review. These stages are further described in Figure 1.

This Commonwealth Statement reflects the final phase of action, the review phase.

The review phase aims to consider the effectiveness of the Government’s approach to addressing modern slavery risks across the Commonwealth and inform planning for the future direction of Commonwealth action.

Figure 1. Commonwealth’s planned 6-year program of work



Review objective and criteria

The objective of the review is to assess the effectiveness of the Commonwealth's actions over the 6-year reporting cycle to build the capability of NCEs to assess and mitigate modern slavery risk.

To form a conclusion against the objective, the following criteria have been adopted:

- Has the knowledge and understanding of modern slavery in NCEs increased over the reporting lifecycle?
- Are entities using tools to assess and manage modern slavery risk in their procurement and contract management activities?
- Where perceived or actual instances of modern slavery are identified, are NCEs taking appropriate action to respond to those instances?

Methodology

The review consists of 2 elements:

1. A desktop review examining the actions taken in the Commonwealth since the establishment of the Modern Slavery Act and their effect on the Commonwealth's capability to mitigate modern slavery risk.
2. Two surveys run in 2022⁵ and 2025, to measure progress against the Performance Framework.

Review findings

The review found that the creation and uptake of e-learning, training and awareness raising activities has effectively increased the knowledge of modern slavery amongst public officials, particularly amongst procurement officers.

NCEs also better understand their supply chains and are utilising tools in procurement and contract management to better identify risk and put in place mitigations for modern slavery risk. This includes uptake of supplier risk tools, supplier questionnaire, and standard clauses for tender and contracts.

The review was unable to make a conclusion regarding actions taken by NCEs to respond to perceived or actual instances of modern slavery. There have been no instances of actual modern slavery detected to date. However, there is anecdotal evidence that the NCEs are prepared and able to take action in the event of perceived or actual instances of modern slavery risk, for example the supplier engagement undertaken by the Department of Defence in 2022 and 2023 in response to allegations of modern slavery in its construction supply chains.

The Australian Government has developed a number of mechanisms which enable grievances to be raised in respect of the conduct of Australian businesses, for example, the Australian National Contact Point for Responsible Business Conduct is responsible for promoting the *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct* and resolving complaints about multinational business conduct. Refer to page 35 of the *Commonwealth Modern Slavery Statement 2023–24*.

Overall, the Commonwealth has made significant progress in enhancing its approach to managing modern slavery risk in its supply chains and operations. These activities remain largely focused on procurement and there remains opportunity to further embed modern slavery risk management within broader organisational risk management frameworks under the PGPA Act, so that modern slavery risk is managed consistently with NCEs' other enterprise risks.

Detailed findings

Understanding of modern slavery risk

Annual reporting from NCEs indicates an increase in training participation, including completion of the e-Learning modules. The Attorney-General's Department also continues to observe increased engagement from NCEs seeking to gain an understanding of their obligations and what they can do to improve their processes to manage modern slavery risk.

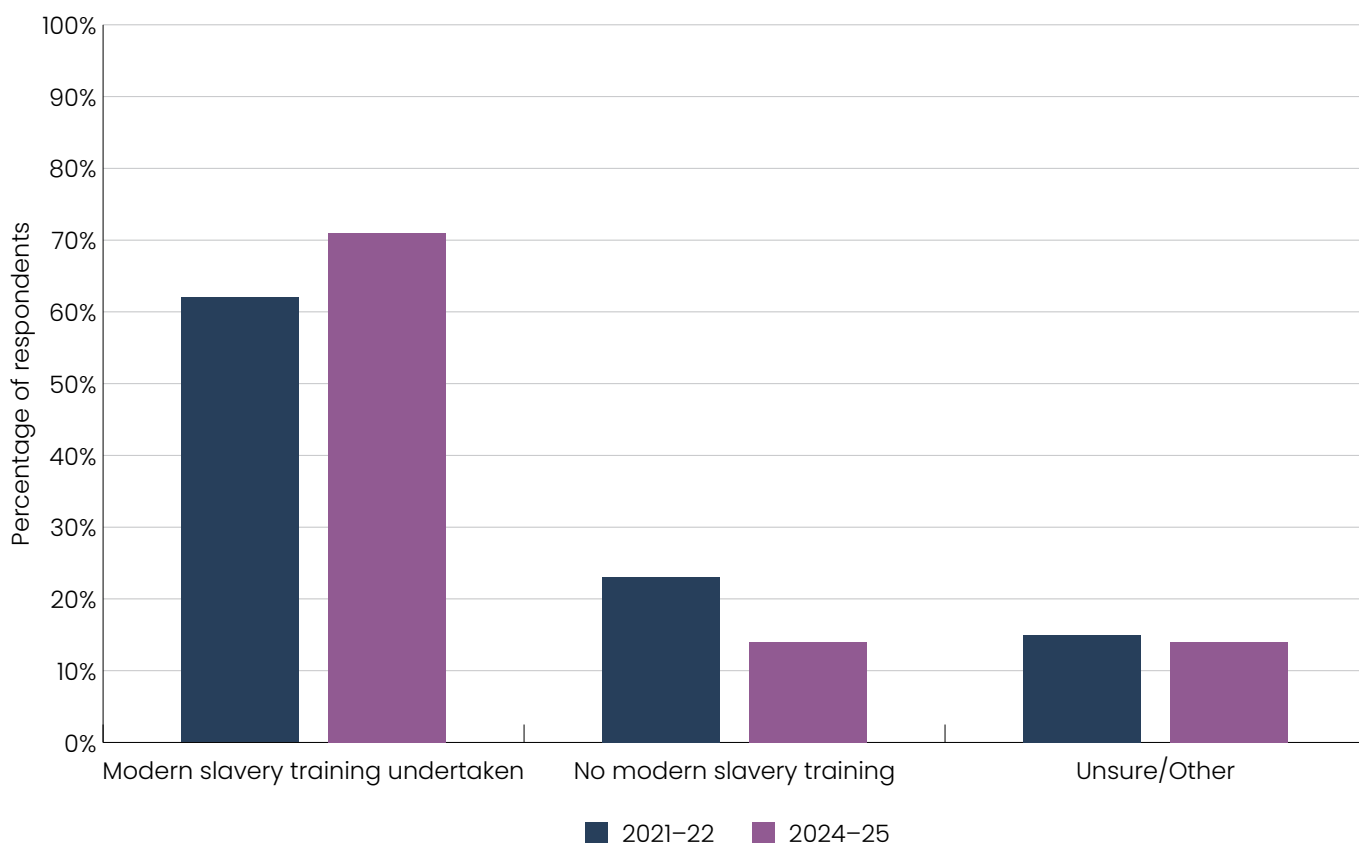
A large majority of the 2025 survey participants (90%) reported that the e-Learning modules developed by the Australian Government helped them *understand* modern slavery risks better. A comparison of results from the IDCP surveys indicate a 9% increase in the number of NCEs reporting that modern slavery training is *available* for procurement officials as shown in Figure 2 below.

The proportion of NCEs tracking participation in modern slavery training rose significantly from 13% in 2021–22 to 40% in 2024–25.

These results indicate the e-Learning modules, training, and awareness-raising activities have been effective in improving understanding of modern slavery risks among government officials. In addition, increased participation in training indicates an increase in awareness of modern slavery risks among NCEs.

⁵ Note: the results of the 2022 survey were reported in the *Commonwealth Modern Slavery Statement 2021–22*.

Figure 2: Percentage of NCEs with modern slavery training for procurement officials



Use of tools to assess and mitigate risks

The 2025 survey indicated that the utilisation of the Modern Slavery Toolkit remained relatively stable with 78% of agencies reporting its use in 2025 compared to 77% in 2021-22.

The 2025 survey also indicated:

- 48% of NCEs felt *supported* in terms of identifying modern slavery risk.
- 95% of NCEs who used the Modern Slavery Toolkit reported that it assisted them to better *understand* modern slavery risks in procurement.
- 86% of NCEs reported that the Modern Slavery Toolkit assisted them to better *respond* to modern slavery risk in procurement.
- The most commonly used resource within the Modern Slavery Toolkit were the modern slavery contract clauses.
- Annual reporting indicates that in both the 2023-24 and 2024-25 reporting periods, approximately 24% to 25% of NCEs are using the Supplier Questionnaire within the Modern Slavery Toolkit.

Inputs from NCEs for the Commonwealth Statement have shown:

- improved descriptions of modern slavery risk assessments
- improved ability to identify modern slavery risks by revising existing risk assessments that are embedded within procurement process
- more detailed information on their use of tender and contract clauses, including specific types of clauses used for risk types
- improved procurement processes to incorporate modern slavery risk considerations and improved understanding of identifying high risk suppliers.

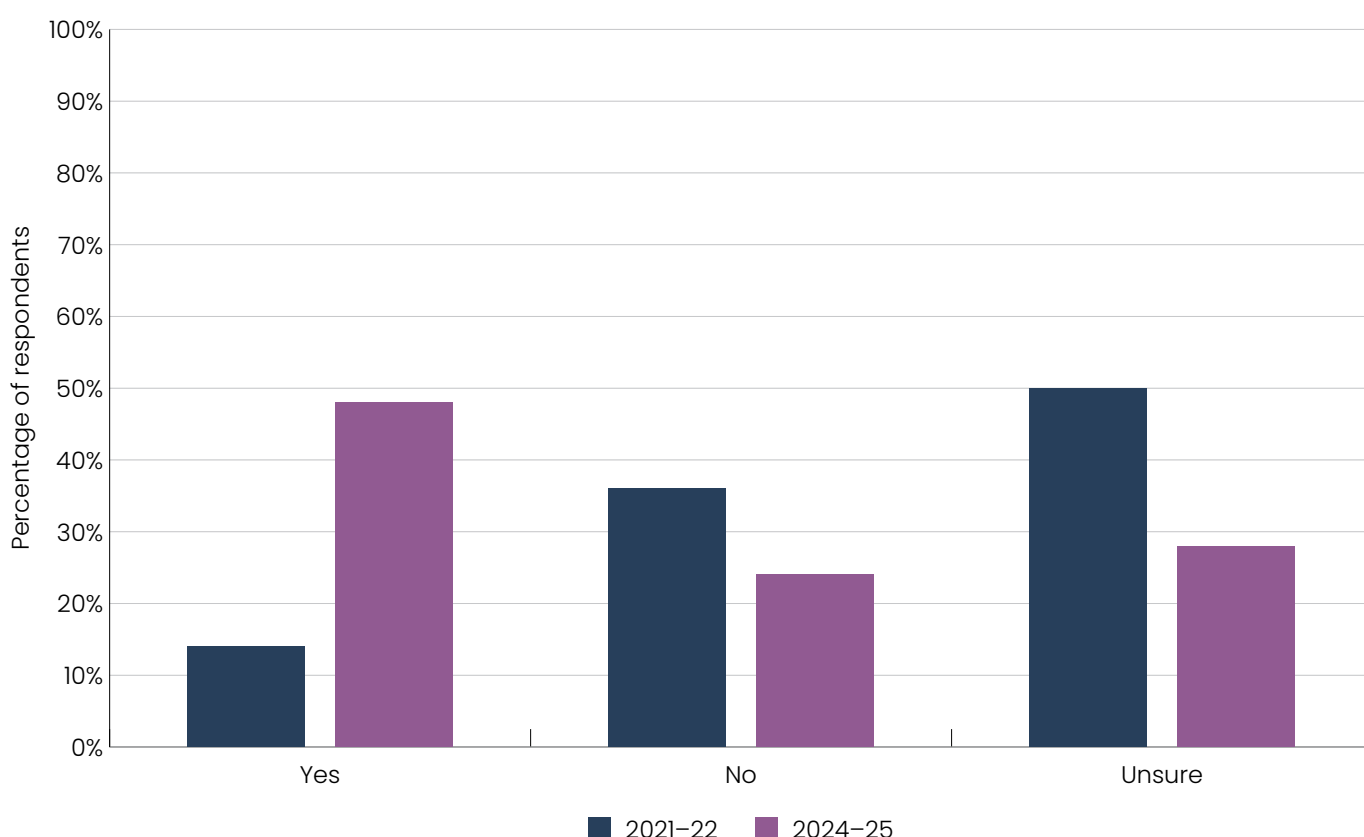
These improvements are indicative that the NCEs are using and building on the tools developed by the Attorney-General's Department to assist them to assess and mitigate modern slavery risk.

Appropriately responding to instances of modern slavery

The 2021–22 survey indicated that only 9% of survey participants were confident to identify and raise modern slavery risk or issues with suppliers, while the 2024–25 survey indicated that this has grown significantly to about half of respondents (52%) who felt confident in their ability to raise modern slavery risks or issues with suppliers.

Survey analysis shows there was a marked increase in the number of agencies having direct engagement with suppliers in relation to modern slavery risks rising from 14% in 2021–22 to 48% in 2024–25 (Figure 3). Direct engagement could include receiving responses to the supplier questionnaire, conversations about modern slavery risk management, and any reports of perceived or actual instances of modern slavery.

Figure 3: Direct engagement with suppliers in relation to modern slavery risk



Over the past 6 years, no substantiated instances of modern slavery involving Commonwealth operations and supply chains have been reported.

Annual reporting through the Commonwealth Statements is showing improvements in NCEs taking steps to respond to identified modern slavery risks in their procurement activities. To better understand the capacity of Commonwealth officials in managing modern slavery risks, the 2025 survey asked whether the survey participant felt supported in managing modern slavery risks. The 2024–25 survey indicated that 40% of the survey participants felt *supported in terms of managing modern slavery risks*.

The risk assessments and supply chain mapping exercises for modern slavery risks undertaken at a whole-of-government level improved the Commonwealth's understanding of supply chain complexities and identified areas of improvement to manage risk.

To date, there have been anecdotal instances which demonstrate some capability to respond to perceived or actual instances of modern slavery. For example, previously, the Commonwealth reported on the actions taken by the Department of Defence, when it responded to alleged instances of modern slavery reported by international workers during 2022–23 in its construction project, including by undertaking comprehensive investigation and supplier engagement, which ultimately determined that the allegations did not involve modern slavery. Refer to page 41 of *Commonwealth Modern Slavery Statement 2022–23*.

Similarly, as reported in the *Commonwealth Modern Slavery Statement 2023–24*, the Future Fund Management Agency identified several modern slavery incidences reported by ASX companies, including 7 ASX companies that reported actual modern slavery and 5 ASX companies that reported potential instances of modern slavery. These incidences were disclosed in each ASX company's

modern slavery statement and were investigated and addressed by the companies themselves in accordance with their own modern slavery obligations and policies. Where an actual or potential incidence of modern slavery is identified, the ASX company is added to the Future Fund's strategic engagement program.

While anecdotal, these instances demonstrate some level of developing capability for the Commonwealth to respond to instances of modern slavery.

Future focus

While the Commonwealth has made significant progress since the inception of the Modern Slavery Act, there remains further work to strengthen modern slavery risk management and embed within NCEs' broader risk management activities.

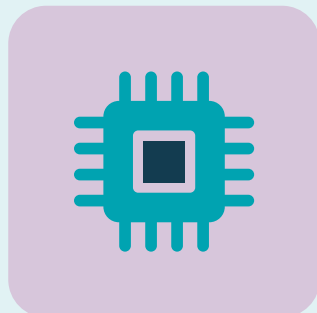
Outcomes of the supply chain audit for modern slavery risk will deepen the Commonwealth's understanding of sources of modern slavery risk in its supply chains, to identify more specific risks to inform targeted actions. Other practical outcomes of the audit include examining supply chain mapping and risk identification tools that, if operationalised in the Commonwealth context, would enhance capability in screening for modern slavery risk during the procurement lifecycle.

The *National Action Plan to Combat Modern Slavery 2020–25* will be finalised at the end of 2025 followed by an evaluation conducted by the AIC to inform Australia's future strategic approach to modern slavery, including informing future actions of the Commonwealth to manage modern slavery risk in its supply chains and operations.



Section 3

Input from government
portfolios and parliamentary
departments



This section describes the risks of modern slavery in supply chains and operations, the actions taken to assess and address the identified risks and measures of effectiveness that are specific to the NCEs within each of the 15 portfolios and the 4 parliamentary departments, further fulfilling the requirements of paragraphs 16(1)(c), (d) and (e) of the Modern Slavery Act.

Each portfolio has distinct responsibilities and undertakes procurement activities in support of these responsibilities. Portfolios differ in size and encounter unique challenges, resulting in varying levels of maturity in identifying and responding to risks of modern slavery.

During the reporting period, NCEs have continued their efforts to:

- assess modern slavery risk with consideration to the scale and scope of the procurement
- utilise available tools and guidance
- engage with suppliers on modern slavery risk
- track their actions and improve ways to assess their effectiveness
- collaborate with other agencies within and outside their portfolio.

Figures 4, 5, 6 and 7 provide an overview of the use of the training, tools, and resources available across portfolios and parliamentary departments. These include the use of e-Learning modules, the Supplier Questionnaire, and modern slavery contract and tender clauses. All indicators remained largely stable, with a pleasing increase in the use of modern slavery tender clauses by NCEs.

Figure 4: Overview of modern slavery training for procurement staff by NCEs

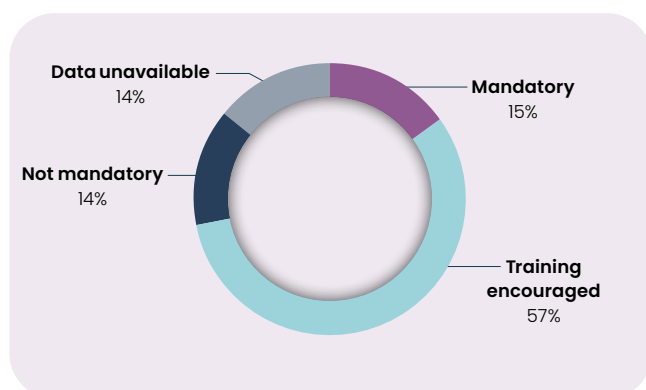


Figure 5: Overview of how the modern slavery contract clauses are utilised by NCEs

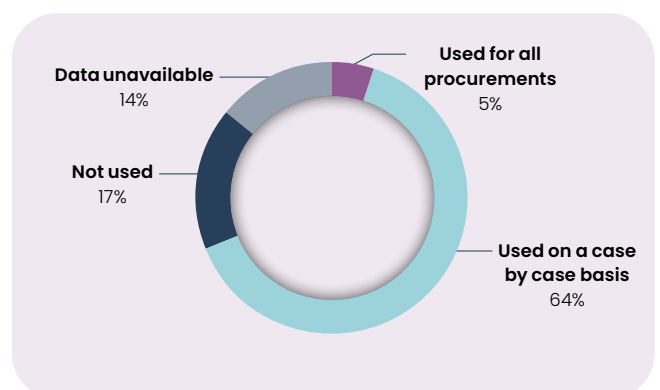


Figure 6: Overview of how the modern slavery tender clauses are utilised by NCEs

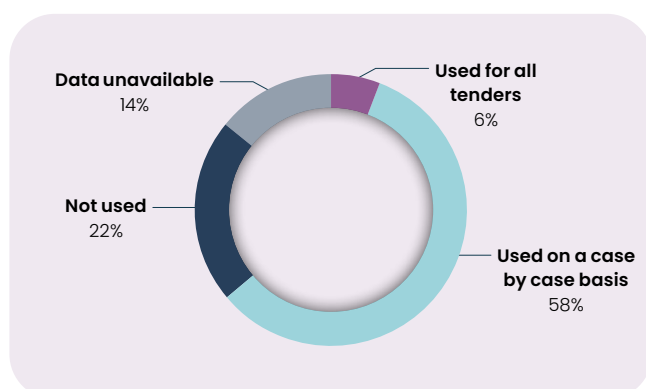
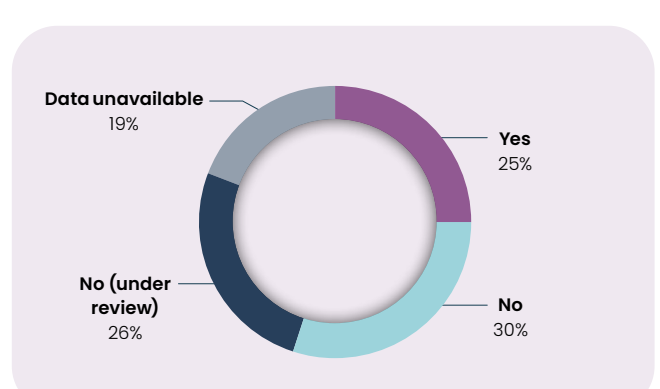


Figure 7: Overview of whether the Supplier Questionnaire within the Modern Slavery Toolkit is utilised by NCEs



Agriculture, Fisheries and Forestry

The Agriculture, Fisheries and Forestry portfolio represents the national interest across agricultural, fisheries and forestry industries. It is inclusive of 2 NCEs, the Department of Agriculture, Fisheries and Forestry (DAFF) and the Australian Fisheries Management Authority (AFMA).

DAFF strengthens Australia's agriculture, fisheries and forestry sectors by supporting farmers, fishers and foresters, building our export markets, and safeguarding our plants, animals and the environment from pests and diseases. Working with stakeholders to bolster agricultural production, facilitate trade, maintain biosecurity and strengthen Australia's food security, DAFF plays a vital role in advancing a more resilient, prosperous, and secure Australia.

AFMA is responsible for the efficient management and sustainable use of Commonwealth fish resources on behalf of the Australian community. They devise management regimes in relation to Australian fisheries including obligations under international agreements. AFMA ensures that its management strategies are consistent with international law and agreements.

During the reporting period, the five areas of highest contract value for the portfolio were:

1. temporary personnel services
2. ICT services, including hardware, software, maintenance and support
3. environmental management
4. property management and construction, including lease and rental of property or building
5. business administration service.

Risk

The portfolio has continued to target modern slavery risks during the 2024–25 financial year, and the main industries identified as potentially high-risk remain:

- cleaning and security services
- ICT hardware
- textiles (uniforms)
- construction and maintenance.

These areas are considered high-risk due to the inherent risks within their supply chains which can result in multiple levels of subcontracting, informal labour arrangements and protections. These supply chain risks include lower transparency and oversight, making it difficult to trace modern slavery and where undetected occurrences may present.

Modern slavery risks are identified through various actions across the portfolio, throughout the procurement lifecycle as addressed below.

Planning the procurement

During planning, consideration is given as to whether modern slavery is prevalent with the good and/or service being procured, including the supply chain model involved. The procurement planning and approach to market documentation is provided to a central Procurement Team for review and advice on any additional requirements necessary to proceed with the procurement. For example, the addition of potential mitigation strategies throughout the life of the procurement.

A formal Procurement Risk Assessment is completed to identify whether the procurement activity may introduce modern slavery risks into the department's supply chain with consideration given to the industry/sector being approached, the location of goods and/or services and the likelihood and prevalence of modern slavery risk.

If there are risks of modern slavery identified, modern slavery clauses will be added into the procurement documentation as necessary. During the reporting period the short form clause has been used as the default within DAFF templates. The templates also include guidance to assess if standard or long form clauses should be incorporated. A suite of bespoke approach to market documentation and contract templates exist that include modern slavery clauses to alert prospective tenderers of measures being taken by the NCE, and to prompt tenderers to review their supply chains in accordance with the degree of risk.

Legal advisers are engaged for high-risk procurement activities where required.

Approaching the market

Modern slavery clauses are incorporated into the initial approach to market documentation to outline and address modern slavery requirements as appropriate. The approach to market documentation also stipulates the draft modern slavery contract clauses to be adhered to throughout any resulting contract, for acceptance and compliance by any successful supplier.

Potential suppliers are asked to provide details of how they identify, assess and address risks of modern slavery practices in their operations and supply chains, which may also include the need for a further policy or plan to be provided. This allows for the adoption of any required mitigation strategies for any risks identified.

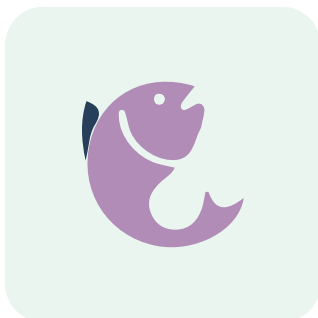
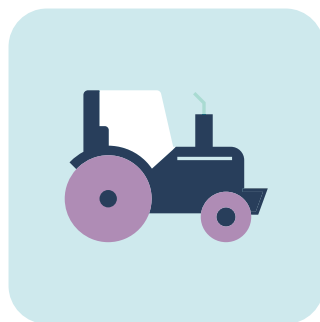
Evaluate and engage

Modern slavery risk considerations are incorporated into standard clauses and contract terms. This may include necessary provisions for the ongoing management of and engagement with the supplier, a requirement to conduct due diligence of the suppliers' supply chain and operations.

Report and manage the contract

Prompts are embedded in contract management tools and resources to ensure that modern slavery risks are considered by portfolio officials during the ongoing contract management phase. For example, there is a dedicated section in the Contract Management Guide describing modern slavery, with guidance and links to additional resources to assist in managing the risk. There are also prompts in the 'Transition-In Checklist' to consider risks of modern slavery and references are included within the Contract Management Principles training module. This is to ensure that modern slavery risks are considered in the start-up phases and then continued throughout the contract management phase.

Measures to safeguard against potential modern slavery risks are incorporated and action plans are developed to mitigate any identified risks in each contract, where appropriate. This contributes to building knowledge of relevant supply chain risks and how to best manage them.



Response

Training and awareness activities

Over the reporting period, the portfolio continued its commitment to training and awareness activities, including:

- Face-to-face procurement and contract management training that covers the consideration of modern slavery risks in supply chains and operations. This is captured through the following training courses on offer:
 - Procurement Principles
 - Procurement Planning and Processes
 - Contract Management Principles.
- Provision of strategic advice to officials and promotion of the Modern Slavery Toolkit resources to support officials undertaking procurement activities as applicable. The resources are available to officials through the Procurement Policy.
- e-Learning modules for staff covering the Modern Slavery Act and broader modern slavery considerations for procurement officers. This is a mandatory requirement for members of the central Procurement Team. In the reporting period, DAFF had 68 staff complete the Modern Slavery in Public Procurement e-Learning module and 29 staff completed Managing Modern Slavery Risks in Public Procurement e-Learning module.
- Internal communications to staff raising awareness of modern slavery and practical tips to apply when undertaking a procurement activity.
- The DAFF Procurement and Contract Management Community of Practice runs quarterly; in the December 2024 session we presented information and awareness on modern slavery and promoted the use of the resources available and consideration of applicable contract clauses.



Procurement and contract management activities

The portfolio utilises mandatory WoAG coordinated procurement arrangements and encourages the use of existing panel arrangements (Standing Offer Notices) established by other agencies. This includes the use of standardised templates, including the Commonwealth Contracting Suite (CCS), to address modern slavery requirements for procurements over \$200,000 GST inclusive and incorporating modern slavery clauses into the initial approach to market documentation. This initial approach to the market will outline and address modern slavery requirements. It also stipulates the draft modern slavery contract clauses to be adhered to throughout any resulting contract, for acceptance and compliance by any successful supplier.

DAFF has a suite of bespoke approach to market documentation and contract templates that include modern slavery clauses to alert prospective tenderers of measures being taken by the department, and to prompt tenderers to review their supply chains in accordance with the degree of risk. Legal advisors are also often engaged for high-risk procurement activities where professional support and guidance is provided to contract managers to ensure we remain compliant, proactive, and diligent.

DAFF has implemented a new procure-to-pay process which requires additional assurance checking at procurement planning stage through to contract execution. This process involves the Procurement Team providing review and compliance checks on procurement activities including ensuring modern slavery risk is addressed and managed accordingly, as it is singled out as a specific risk for consideration on all procurement activities over the value of \$10,000 GST inclusive.

Through continued efforts, support is provided from a dedicated Contract Management Support team, as well as the central Procurement Team who are working to equip staff with the skills and knowledge to successfully identify, address, and continually manage modern slavery risks.

All procurement and contract management materials are updated to capture any identified or developing changes to ensure guidance and training on modern slavery remains fit-for-purpose. In the department, guidance and templates are available to departmental officials during the contract management phase, with prompts embedded through the department's Contract Management Framework.

Our Framework specifically addresses modern slavery, with its own section in the Contract Management Framework Guide. It is included as a prompt within the Contract Management Checklist and Contract Management Plan specifically within the 'Transition-In Checklist' section, and broadly referenced in the 'Probity, Security, Integrity and Fraud Control Checklist' section for Managers to consider modern slavery. This is to ensure that modern slavery risks are considered in the startup phases and then continued throughout the contract management phase.

It is also included within the Contract Management Principles training module and is also accessible via the Contract Management Learning Bite.

In the DAFF ICT procurement space, most procurement activities are conducted through arrangements established by the DTA, which has established requirements to address modern slavery risks with suppliers. The DTA's procurement frameworks incorporate due diligence measures, including supplier assessments and contractual obligations, to ensure that modern slavery considerations are embedded throughout the procurement lifecycle. By leveraging DTA procurement arrangements, the department benefits from a consistent and coordinated approach to managing modern slavery risks in ICT supply chains. One contract for managed network services includes a modern slavery risk management plan entered into during the reporting period.

DAFF has entered into an agreement with an approved property services supplier under the WoAG arrangement that incorporates comprehensive modern slavery risk management practices. As part of this arrangement, the supplier is required to maintain a Modern Slavery Risk Management Plan that outlines proactive measures to identify, assess, and mitigate risks across its operations and supply chains. The agreement also includes a formal grievance mechanism to ensure that any concerns or allegations related to modern slavery can be raised and addressed in a timely and transparent manner. In addition, subcontractors engaged under this arrangement are required to complete an Ethical Supplier Declaration, affirming their commitment to ethical labour practices and compliance with modern slavery obligations.

Supplier activities

DAFF currently accesses Services Australia's Corporate Wardrobe contract to supply uniforms. DAFF has activated a multi-agency clause, allowing it to receive services under the agreed terms and conditions. Refer to page 102 of Section 3 for details on Services Australia's Corporate Wardrobe contract.

AFMA utilised the Supplier Questionnaire for 1 Request for Tender (RFT) undertaking and reviewed during the evaluation phase for a procurement undertaken during the reporting period.

Response activities

Complaints or feedback can be provided in a variety of methods and may be submitted at any time during or after completion of a procurement related activity. Complaints can be made through the following channels:

- External departmental websites provide guidance on how to submit a complaint, complaint forms, relevant contact information and submitting Public Interest Disclosures.
- Tender documentation includes contact information to submit a complaint or provide feedback during a procurement process.

The department has an internal Procurement Policy Guideline relating to handling complaints regarding procurement activities.

There have been no identified complaints relating to modern slavery over the reporting period.

Outcomes

Measuring effectiveness

During the reporting period 132 staff completed procurement training. A further 97 staff across the department completed the modern slavery e-Learning modules, this is an increase of approximately 35% from the last reporting period.

The portfolio's approach to undertaking risk assessments has been improved over the reporting period, ensuring modern slavery risks are considered as part of the standard risk assessment process on every procurement, regardless of value. This has resulted in an increased use of modern slavery risk management plans and modern slavery tender and contract clauses.

DAFF's effectiveness has been demonstrated by the implementation of the new procure-to-pay process that introduces enhanced assurance checks from the procurement planning stage through to contract execution. As part of this process, the Procurement Team conducts reviews and compliance checks to ensure procurement activities address and appropriately manage modern slavery risks. DAFF is able to extract reporting to identify contracts that have considerations to modern slavery and if a modern slavery risk management plan has been used.

The portfolio is an active supporter of the Australian Government's efforts to assess and address modern slavery risks in Commonwealth supply chains when undertaking procurement activities. DAFF as lead department has attended all IDCP meetings for the reporting period to ensure frequent engagement across agencies can be achieved.

Looking forward

DAFF remains an active member of the IDCP, reinforcing our commitment to working collaboratively across the Commonwealth to address and mitigate modern slavery risks in procurement practices. As part of this engagement, we plan to introduce the ReSPOND Framework, when finalised, to departmental officials, ensuring a consistent and effective approach to responding to alleged or actual instances of modern slavery involving suppliers.

We also intend to expand the use of the Modern Slavery Toolkit in our procurement processes, with a particular focus on strengthening supplier engagement through the use of the Supplier Questionnaire, especially in higher risk procurement categories.

With the implementation of the DAFF procure-to-pay function, we are continuing to enhance our data collection capabilities. This will support more robust recording and reporting of modern slavery risks in public procurement, enabling more informed decision making and targeted risk mitigation strategies.

AFMA will continue to uplift its procurement processes to include the use of modern slavery tender and contract clauses as part of the procurement and contract management manuals and processes.

Progress

Since the previous reporting period, the department has undertaken an upgrade to the financial management information system which has uplifted capability and improved risk identification practices. Modern slavery risks are considered as part of the standard risk assessment process on every procurement with a value of \$10,000 GST inclusive or greater, captured within the procure-to-pay system.

This has resulted in greater oversight from the central Procurement Team on modern slavery risks, allowing for enhanced assurance checks from the procurement planning stage through to contract execution.

This implementation is improving data collection and reporting capabilities, enabling the identification of procurement activities with elevated modern slavery risks. It also facilitates the inclusion of relevant resources and contract clauses, particularly in high-risk categories.

As part of this implementation, we aim to reinforce the use of the Supplier Questionnaire. While it is difficult to determine its consistent application, DAFF is now focused on strengthening this process, leveraging our improved ability to record and assess modern slavery risks.

Attorney-General's

The Attorney-General's portfolio has diverse responsibilities that encompass legal services, national security and criminal law, integrity and anti-corruption matters, the Commonwealth justice system including courts, tribunals, justice policy and legal assistance, regulation and reform, protecting and promoting human rights, and support for Commonwealth royal commissions.

The portfolio for the majority of 2024–25 included 18 NCEs.

The NCEs with reporting obligations that fell under the portfolio for the majority of 2024–25 were:

- Administrative Review Tribunal (ART)
- Attorney-General's Department
- Australian Crime Commission (Australian Criminal Intelligence Commission (ACIC))
- Australian Federal Police (AFP)
- Australian Financial Security Authority (AFSA)
- Australian Institute of Criminology (AIC)
- Australian Law Reform Commission (ALRC)
- Australian Security Intelligence Office (ASIO)
- Australian Transaction Reports and Analysis Centre (AUSTRAC)
- Federal Court of Australia
- National Anti-Corruption Commission (NACC)
- Office of the Australian Information Commissioner (OAIC)
- Office of the Commonwealth Ombudsman
- Office of the Director of Public Prosecutions (CDPP)
- Office of the Inspector-General of Intelligence and Security (OIGIS)
- Office of Parliamentary Counsel (OPC)
- Office of the Special Investigator (OSI).

The Attorney-General's portfolio mostly procures its goods and services through WoAG arrangements. These are either coordinated or cooperative procurements, some of which are mandated, and generally result in overarching contracts or standing offer (panel) arrangements.

The 5 areas of highest contract value within the portfolio in the reporting period were:

- ICT Software, Maintenance Support and Service (SaaS – Cloud)
- Labour hire – Temporary personnel services
- Property Leasing and management
- ICT Hardware and accessories
- Management Advisory Services, consultancies.

Risks

The Attorney-General's Department and portfolio agencies have identified that procurements for the following products and services contain a risk of modern slavery:

- ICT hardware may be linked to modern slavery due to the extensive supply chain for parts and components which are used to create the end product. Relevant parties are often located in countries where governance is poor, resulting in a higher risk of human rights violations.
- Cleaning services are generally arranged by landlords under lease contracts. Due to the subcontracting nature of these services there is a risk that there may be exploitation of migrant workers and the use of unauthorised subcontractors.
- Construction and maintenance services involve a risk of exploitation of migrant workers and the use of unauthorised subcontractors due to the subcontracting nature of these services.
- Textiles, for example where uniforms and apparel are procured, involved manufacturing processes that take place in countries that may have poor governance, resulting in high-risk of human rights violations.

Given most of the manufacturing of products in the textiles and ICT industry takes place offshore, ensuring supply chains are free from modern slavery can be difficult to monitor for individual agencies.

The Attorney-General's Department has been conducting ASIC searches for all ICT vendors. This check focuses on international ownership, directors and supplier reputation, and are using the Modern Slavery Statements Register to check supplier's modern slavery statements.

The AFP acknowledges that modern slavery risks lie across the AFP supply chain. Generally, risks are higher where there is a lower skilled labour force. Examples include cleaning and security services. The AFP recognises historical underpayment and over-utilisation of labour resources. There is also a large downstream subcontractor delivery base. Risks within the security services supply chain have been identified including engagement of foreign nationals to undertake security services and employment outside of awards overseen by the Fair Work Commission.

Modern slavery risks within these industries combined with high contract values has resulted in these being considered the AFP's highest risk areas. A number of processes have been implemented to address modern slavery risks across the portfolio. These include:

- Encouraging the use of modern slavery training and tools, in conjunction with internal information and documentation.
- Requesting modern slavery statements from tenderers in open tender processes and considering these during the risk assessment process.
- Conducting contract negotiations and holding regular contract management meetings to understand how suppliers are mitigating addressing modern slavery risks, including those related to subcontractors in ICT procurements.

AUSTRAC requires all business areas undertaking procurement activities to consider modern slavery risks as part of their spending proposal submission. Delegate approval is required of each spending proposal to ensure modern slavery risk is considered. The spending proposal references the Modern Slavery Toolkit to assist AUSTRAC personnel make their assessments.

Considerations for modern slavery risks are included in ACIC's Risk Management Assessment Plan and spending proposal template when it comes to the focus categories. Delegate approval is required of the spending proposal, ensuring modern slavery risk is considered. These templates are also used by the AIC.

The AFP vets all vendors and subcontractors through the procurement processes and submissions must align with both AFP and Commonwealth requirements. Tenderers must confirm their acceptance to, incorporation of, and compliance with, the Supplier Code.

The AFP manages cleaning services through JLL. JLL works closely with downstream vendors through a formal ongoing vendor management framework and due diligence audits. These place a focus on ensuring compliance with relevant modern slavery legislation.



JLL addresses modern slavery risks through an industry-leading framework as well as the robust procedure outlined in this submission. These initiatives include:

- Ethics Everywhere program, which embraces and promotes strong principles of business and professional ethics at every level of their company
- Code of Business Ethics, which specifically prohibits modern slavery activities
- Vendor Due Diligence Policy, which prohibits doing business with suppliers engaging in illegal practices
- Global ESG Sourcing and Procurement Policy
- Human Rights Policy
- Corporate Governance policy addressing Anti-Slavery and Human Trafficking
- contractual provisions requiring suppliers' commitment to ensure there is no modern slavery or human trafficking in their organisation or supply chains.
- high-level risk assessment to identify high-risk employment sectors and geographies
- collaboration with clients and NGOs to learn and implement best practices
- training for suppliers through 'OnSite'
- training for high-risk business lines
- periodic communications to raise awareness
- annual reporting on progress in their modern slavery statement
- JLL Global Modern Slavery Committee meetings.

JLL assess suppliers to understand their inherent risk based on the below risk characteristics:

- Workplaces with hazardous, low-skilled, seasonal, or low-paying work.
- Industries with high resource demands, multi-tiered supply chains, or high quantities of materials or parts.
- Industries with a large labour force, no unions, outsourced recruitment or fees placed on workers.
- Regions with limited regulation, high levels of corruption and low levels of education.
- Suppliers where prices are too cheap or where there are sudden changes in demand.

The category of service identified with the highest risk profile is cleaning. To mitigate the risk and ensure there are no instances of negligence with regards to the supply of labour, JLL have developed a robust cleaning framework.

To manage the risk as part of tender submissions the vendors have confirmed acceptance of the following items:

- Adherence in payment to staff in meeting the Fair Work Modern Award.
- The Cleaning Accountability Framework (CAF).
- JLL's contractual supplier agreements includes compliance with modern slavery requirements.

The purpose of adhering to an industry standard as set by CAF is to ensure cleaning employees are paid at the modern award. JLL has developed a leading industry pricing schedule and analytics to monitor that there is no under payment of employees in the delivery of cleaning services.

JLL impose strict anti-modern slavery contractual obligations on their suppliers. This includes a commitment to abide by their global Human Rights Policy, which prohibits violations of human rights anywhere in their operations or our supply chains. This also includes their Vendor Code of Conduct, which requires suppliers to comply with modern slavery laws and refrain from engaging in modern slavery practices, including forced labour, and human trafficking.

JLL manages all downstream suppliers via their Vendor Management Framework and Vendor Code of Conduct, which include, among other items, compliance statements from vendors confirming their adherence to modern slavery legislation. JLL has audit rights into their vendor financial statements and employment contracts that are reviewed as part of the Vendor Management Framework to limit risk around employment conditions.



Response

Training and awareness-raising

The modern slavery e-Learning modules have been integrated into the training platforms of several agencies in the portfolio and are mandatory for most central procurement staff, including ICT procurement teams. Completion is also encouraged for all officials involved in procurement activities.

The portfolio is represented on the IDCP, and related workshops. These forums focus on identifying opportunities to strengthen the management of modern slavery risks across the portfolio. Centralised procurement staff and contract managers responsible for ICT and textile-related contracts have also participated in these discussions.

ACIC and AIC

The ICT Division has been engaged to support the application of modern slavery resources in their procurement activities. New staff members joining the ACIC in procurement-focused roles are encouraged to complete the modern slavery e-Learning modules as part of their onboarding.

AIC specifically, has produced a number of research papers into this space using data collated from the AFP, DSS, Department of Home Affairs and CDPP on modern slavery matters including human trafficking and forced marriage in Australia. Dr Samantha Bricknell was also interviewed on Radio National, 20 November 2024, discussing her research and findings on forced marriage being the most dominant form of modern slavery in Australian during 2022 ([Modern slavery exists in plain sight: AIC - ABC listen](#)). AIC uses the insights of its research to inform its own response to managing modern slavery risk and shares this information with other agencies through forums including the National Roundtable on Human Trafficking and Modern Slavery.

AFP

The modern slavery e-Learning modules have been included as part of the AFP iAspire training platform. It is mandatory for all central procurement staff who actively promote to AFP staff with a focus on contract managers, contract administrators and those involved in procurement activities.

Other portfolio agencies

Most portfolio agencies are not major government procurers of goods and services typically associated with a high-risk of modern slavery. As smaller agencies, they often participate in cooperative procurement arrangements for facilities and related services.

Procurement and contract management

Attorney-General's Department

The Attorney-General's Department continues to consider current practices and are reviewing whether the Supplier Questionnaire can be adopted into contract management processes. The Attorney-General's Department added modern slavery clauses to the Hardware, Software and the Digital Marketplace panel work orders.

AFP

Modern slavery requirements are included within select AFP RFT documents.

The recently updated AFP National Guideline on Procurement and Contracting references the Modern Slavery Act and includes links to the Australian Government's modern slavery resources.

The AFP engages a single service provider through the Security Services and Maintenance Panel Standing Offer Notice (SON3441941) for the provision of National Security Guard and Patrolling Services. Section 16.12.2 of the SON states 'the service provider agrees to comply with any legislation applicable to its performance of this deed'. The applicable legislation includes the *Crimes Act 1914* (Cth) which includes reference to offences against Division 270 of the *Criminal Code Act 1995* (Cth) (the Criminal Code). The service provider employs all their security staff under an award overseen by Fair Work Australia and in line with relevant State and Territory security industry legislation.

As part of procurement processes the service provider and key personnel (including the bid manager and company directors, area managers, partners and/or specified personnel as applicable), are required to undergo a security, suitability, professional conduct and integrity assessment to determine if the personnel and supplier are suitable to provide goods or services to the AFP. All workers engaged by the AFP under the National Security Guard and Patrolling Services contract are required to be security cleared to AFP Negative Vetting 1 level. Australian citizenship is a mandatory eligibility requirement for all Australian government security clearances.

AFP infrastructure tenderers must confirm their acceptance to, incorporation of, and compliance with, the Supplier Code.

ACIC

Most of ACIC's procurement activities are performed using existing panel agreements such as the DTA's Marketplace and other coordinated/cooperative procurements, where there are well scoped provisions with regards to modern slavery. Modern slavery considerations are included in ACIC's Procurement Policy and Procedure and staff in relevant procurement roles are trained and knowledgeable in what is to be included in approach to market documentation and resulting contracts.

Supplier activities

AFP

The AFP have engaged in discussions with the security service provider in relation to modern slavery risks, to ensure it has a modern slavery policy and is compliant with all relevant Australian legislation. The service provider has a comprehensive and robust policy on modern slavery. The service provider recognises that businesses have an important responsibility to respect and promote human rights in their operations and supply chains and must play a key role if the quest to eradicate modern slavery is to be achieved.

OPC

OPC's property management is undertaken by third parties. Due to this being a high-risk area, OPC sought assurances from the provider as to how they were managing their modern slavery requirements. OPC was advised that they had various policies in place regarding modern slavery and took their obligations very seriously. These policies were provided to OPC to ensure their assurances were accurate.

Response activities

AFP

JLL's Ethics Everywhere Helpline is a confidential reporting platform available to our employees, contractors, clients, supply partners, and members of the public if they have a concern or suspect behaviours that are inconsistent with the Supplier Code. It is available 24 hours a day, 7 days a week, and reports can be made anonymously.

JLL's Whistleblower and Non-Retaliation Policy further supports our efforts to encourage speaking up by addressing the challenges of remediating illegal activities while protecting victims.

Looking forward

AFP

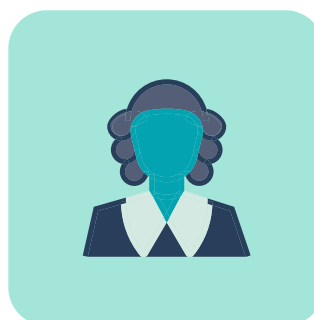
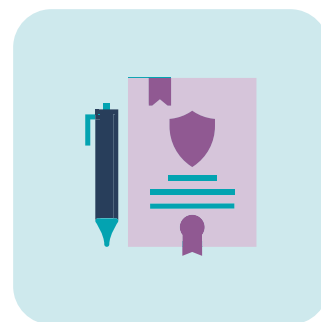
- The AFP National Guideline on Procurement and Contracting is under review. This review includes all associated procurement and contract management documentation and templates. The review is expected to strengthen modern slavery considerations within the guideline itself, risk assessment templates, contract clauses and contract management plans.
- The AFP is currently updating its suite of contract management documentation and templates. The updated documents are expected to strengthen modern slavery considerations within risk assessment templates, contract clauses and contract management plans.

The AFP intends to focus on supplier engagement including utilising the Supplier Questionnaire in the Modern Slavery Toolkit for higher risk contracts.

The AFP will continue to promote the Modern Slavery e-Learning module training for staff involved in procurement and contract management activities.

AIC and ACIC

- The ACIC and AIC will increase awareness and circulate training communications throughout both agencies.
- The ACIC is undertaking a review of Procurement policy and guidance material. Information on the risks of modern slavery will be strengthened throughout policy, procedure, templates and training. ACIC will also be including the Supplier Questionnaire in phase 2 of the RFT for P24/429 Intelligence Analysis Capability.



Climate Change, Energy, the Environment and Water

The Climate Change, Energy, the Environment and Water portfolio consists of 5 NCEs, representing national interests across climate change, energy, the environment, water and the Antarctic.

The Department of Climate Change, Energy, the Environment and Water (DCCEEW) strives to deliver its vision of an Australia that is prosperous because it is sustainable, with community and Country at the heart of its actions. The department's purpose is to drive Australian climate action; transform Australia's energy system to support net zero emissions while maintaining its affordability, security and reliability; conserve, protect, and sustainably manage our environment and water resources through a nature positive approach; protect our cultural heritage; and contribute to international progress on these issues.

The department also administers the Australian Antarctic Program, delivering scientific research and operations in Antarctica and the Southern Ocean and advancing Australia's interests through science, environmental management and international engagement.

The portfolio agencies include:

The Bureau of Meteorology (BOM) is a mid-sized NCE providing weather, water, climate, ocean and space weather services for Australia. BOM procures a wide variety of goods and services to support its operations with most of its suppliers based in Australia.

Clean Energy Regulator (CER) is established by the *Clean Energy Regulator Act 2011* (Cth). CER operations involve administering Australian Government schemes to measure, manage, reduce and offset carbon emissions in Australia.

Climate Change Authority (CCA) is an independent statutory body established under the *Climate Change Authority Act 2011* (Cth) to advise the Australian Government on climate change policy. The CCA provides evidence-based advice on the response to climate change, to:

- accelerate emissions reductions and position Australia as a leader in the global effort to limit temperature increases
- guide Australia to new opportunities and new ways of doing things, to sustain Australia's prosperity as the world transitions to net zero emissions
- help Australia prepare for and adapt to the impacts of climate change, which have already begun and will continue to increase.

Great Barrier Reef Marine Park Authority (GBRMPA) operates as a statutory agency under the *Great Barrier Reef Marine Park Act 1975* (Cth). The GBRMPA is responsible for managing the Great Barrier Reef Marine Park.

The portfolio reported 4,190 new contracts in 2024–25. The top five areas of highest contract value within the portfolio were:

- environmental management*
- building construction and supplies
- property management services
- temporary personnel services
- management advisory services.

*Environmental management includes water recovery

Risks

During the reporting period, the Australian Antarctica Division of DCCEEW entered into the Australian Infrastructure Renewal Program (AIRP). The AIRP is expected to deliver critical infrastructure, assets, technology and equipment, which may involve supply-chain related modern slavery risks. The Alliance Agreement for AIRP includes provisions to identify, mitigate and manage any risks related to modern slavery practices in operations and supply chains.

Across the broader department and other NCEs within the portfolio, the highest risk areas are primarily in ICT and digital services as well as construction. The portfolio takes several actions to mitigate modern slavery in their arrangements, as follows:

- Modern slavery risk is a consideration in all open approaches to market and, where deemed appropriate, relevant clauses are included in approach to market and contract templates.
- Mandatory WoAG panel arrangements are used for most ICT, construction, property services, management services and labour hire services. WoAG panel arrangements reduce modern slavery risk by using pre-qualified suppliers, standard contract clauses, and ongoing compliance oversight.
- Inclusion of modern slavery risk considerations in risk assessments and contract management documentation.

The majority of the portfolio's spend relates to environmental management services, which are considered low risk for modern slavery as they are largely delivered domestically, depend on qualified professional expertise, and are subject to the Commonwealth's robust procurement processes and employment legislation.

Response

Training and awareness raising

During the reporting period, DCCEEW and portfolio agencies' central procurement teams completed modern slavery e-Learning modules training.

DCCEEW presented on an initiative to integrate modern slavery risk compliance activities into the contract management lifecycle at the IDCP workshop. See page 28 of Section 2 for more details on this initiative.

In addition, DCCEEW and portfolio agencies:

- conducted presentations on Modern Slavery Act requirements to staff
- provided ongoing education and advice to delegates and contract managers about their modern slavery risk management obligations
- hosted and maintained the Modern Slavery Toolkit and other modern slavery related guidance materials in a procurement repository for staff reference
- conducted ongoing policy and procedural reviews of existing procurement procedures against better practice
- ensured training materials are reviewed and updated regularly and remain fit-for-purpose and responsive to change.

Procurement and contract management

Procurement staff monitor higher risk procurement activities where a panel approach is not used – i.e. limited and open tender processes. This includes:

- The use of standard Commonwealth terms and conditions, including model source information and modern slavery clauses in tendering documentation and contracts.
- Where the CCS is not used, modern slavery clauses are embedded in approach to market and draft contract documentation.
- A bespoke procurement and contract management risk assessment template was developed aligning with the department's Enterprise Risk Management framework. The template has specific requirements to manage modern slavery risk.
- Embedding the identification of modern slavery risk in its contract management suite of templates and tools.
- Periodic undertaking of internal assurance reviews to determine alignment with the Australian Government's expectations to strengthen modern slavery risk management in government supply chains and identify any opportunities for improvement.

- Risk assessments are integrated into the procurement workflow system.
- Policy and procedural reviews against better practice in modern slavery risk management
- Procurement and contract management training material is regularly reviewed and updated to remain fit-for-purpose and responsive to change.

During the 2024–25, BOM developed and published an internal *Procurement Procedure* that all staff must comply with when undertaking a procurement. The procedure requires BOM staff to consider modern slavery risks when undertaking a procurement. This procedure was disseminated for staff-wide consultation and feedback prior to finalisation.

Supplier

Where modern slavery risk was identified in potential supply chains, modern slavery clauses and requirements were included in the approach to market and contract templates. Suppliers are required to provide modern slavery identification training to staff and a modern slavery risk management plan. Modern slavery risk management requirements have been built into contract and panel management documentation.

The Supplier Questionnaire was used where risks were assessed as medium or high. To encourage greater levels of supplier engagement, some of the portfolio agencies will consider using the Supplier Questionnaire in other lower risk procurements.

BOM is continuously maturing its contract and vendor management framework with the intent of improving supplier engagement. It is anticipated this will foster supportive, transparent and collaborative relationships with suppliers and assist in mitigating modern slavery risks in their supply chains.

Response

DCCEEW's website provides instructions for making procurement complaints.

DCCEEW is working closely with the Attorney-General's Department to update website information and determine the most appropriate process and channels to report potential modern slavery practices.

BOM, CER and CCA publish guidance about raising and handling procurement complaints, including modern slavery concerns on their external websites. This allows affected stakeholders to raise concerns relating to modern slavery using the website resources or by sending their concerns directly to the relevant email address.

There were no identified allegations received across the portfolio.

Outcomes

Across the portfolio measures included:

- increasing internal communications with line areas to build awareness
- continuing education for delegates and other internal staff
- continuing reviews and updates to tender and contract templates, risk tools, reporting tools
- considering broadening the scope of who training is required for, beyond central procurement team
- use of client satisfaction surveys for each procurement, allowing feedback and improvement of modern slavery identification.

BOM's Procurement and Contracts team undertook 3 internal assurance reviews during the reporting period to monitor compliance against the relevant CPRs and policies. This was in addition to 4 similar internal assurance reviews previously conducted during the 2023–24 financial year. The assurance reviews include assessing alignment with the Australian Government's expectations to strengthen modern slavery risk management in government supply chains and reviewing record keeping practices.

In the 2024–2025 financial year, the CER integrated risk assessments into its financial system. This includes prompts to consider modern slavery risks.

The GBRMPA is planning to implement mandatory yearly procurement training to all staff undertaking procurement activities, which will assist in the identification of modern slavery risks. In addition to the training, the recently implemented Contractor Management framework will help with industry knowledge and provide additional points for staff to consider when conducting new procurement approaches.

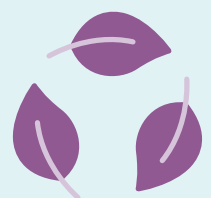
Looking forward

The portfolio intends on improving practices through the following initiatives:

- Undertake a review of procurement categories and operating model to identify potential exposure to modern slavery risk.
- Procurement awareness training on procurement-related policies, to be provided to staff in 2025.
- Highlight modern slavery questions that appear on procurement risk assessments, especially for higher-value procurements.
- Planning for future internal audits of the compliance of procurement connected policies, relevant legislation and alignment with Australian Government's expectations on addressing modern slavery risk in government supply chains.
- Actively promote awareness of modern slavery risks to internal staff, including encouraging completion of modern slavery training.
- Continue to mature Contract Management and Vendor Management frameworks. It is anticipated this will improve contract management practices, strengthen relationships with suppliers and help prevent future modern slavery risks.
- Review and update existing templates, tools and other procurement resources to ensure proactive modern slavery risk mitigation is fully embedded in the procurement framework.
- BOM plans to use its internal 'Contract Register' database to more accurately identify and report on procurements with higher levels of modern slavery risk and leverage this data to inform future improvements to the procurement framework.

Case Example

During the planning of an open tender to establish a panel of uncrewed systems goods and professional services to support the work of the Chief Remote Pilot, a higher risk of modern slavery was identified. Modern slavery contract clauses were incorporated in both approach to market documents and resultant deeds. Suppliers must provide a Modern Slavery Action Plan as part of the establishment of the deed which also includes modern slavery training. Ongoing panel management will include regular reviews of the Plans.



Defence

Defence's mission and purpose is to defend Australia and its national interests in order to advance Australia's security and prosperity.

Defence achieves its mission and purpose through:

- the conduct of operations and provision of support for the Australian community and civilian authorities in accordance with government direction; and
- the provision of strategic policy, the development, delivery and sustainment of military, intelligence and enabling capabilities, and the promotion of regional and global security and stability as directed by the Australian Government.

The Defence portfolio consists of a number of military and corporate organisations that together are responsible for supporting the Defence of Australia and its national interests. The 2 most significant bodies are:

- Australian Defence Force (ADF)
- Department of Defence.

In addition to the Department of Defence and the Australian Defence Force, the:

- Australian Signals Directorate (ASD) defends Australia from global threats and advances the national interest by providing foreign signals intelligence, cyber security and offensive cyber operations, as directed by the Australian Government.
- Australian Submarine Agency (the ASA) is responsible for safely and securely acquiring, constructing, delivering, technically governing, sustaining and disposing of Australia's sovereign conventionally-armed nuclear-powered submarine (NPS) capability.
- Department of Veterans' Affairs (DVA) supports the wellbeing of those who serve or have served in the defence of our nation, and their families, by partnering with organisations and individuals to help design, implement and deliver effective policies, programs and benefits, which enhance the wellbeing of veterans and veteran families. Additionally, DVA provides and maintains war graves and delivers meaningful commemorative activities to promote community recognition and understanding of the service and sacrifice of veterans.

In 2024–25, the Defence portfolio published a total of 33,833 contract notices and amendments on AusTender with a combined contract value of \$72.29 billion.

The categories with the highest contract value within the portfolio are:

1. Professional engineering services (\$14.378 billion)
2. Building construction and support and maintenance (\$9.698 billion)
3. Conventional war weapons (\$6.507 billion)
4. Marine craft systems and subassemblies (\$4.600 billion)
5. Military services and national defence (\$3.394 billion).

The following caveats apply to this AusTender information:

- AusTender data was extracted on 24 July 2025 for the FY 2024–25 including Defence, ASA, ASD & DVA.
- AusTender contains details of contracts and amendments valued at AUD\$10,000 GST inclusive or greater.
- AusTender contract values are based on the life of the contract, at the point in time of reporting.
- AusTender does not reflect a contracts expenditure or budget.
- AusTender information is continuously updated as contracts are amended, so all figures provided are accurate as at the date of extraction and are subject to change.



Risks

General areas of high modern slavery risk in the portfolio are assessed based on a review of the type of contracted goods and services, the geographical location of supply chains, the strength of government and rule of law and the associated socio-economic risks existing in such environments, both nationally and internationally.

Based on this, the general areas of high modern slavery risk identified in the portfolio include:

- Offshore projects such as infrastructure projects (construction) in Asia and logistics and supply operations (labour hire) in the middle east, both areas known to be at higher risk of modern slavery.
- Direct procurement for high-risk categories of goods and services, such as clothing, footwear, logistics, medical supplies, appliances and personal protective equipment, electronics and ICT hardware and software purchases where downstream supplier employee arrangements may not be known.
- Indirect procurement of goods, such as the importation of raw materials including rare earth elements, and components that enable the manufacture and sustainment of Defence's inventory of weapons, including materials used by service providers to Defence.
- Procurement of building services (including cleaning and security). Service industries even in strong rule of law countries are at-risk depending on the source of the labour, as many small unrecognised subcontractors existing within this category often target new immigrants for exploitation.

Defence has identified these high-risk areas by staying informed of evolving legislation, guidance, and resources related to modern slavery, and by following media reporting on modern slavery, labour exploitation or underpayment, or public reports to government authorities, such as the Australian Fair Work Ombudsman.



Actions taken to identify risks within procurements during the reporting period include the following:

- Using the Australian Government's Modern Slavery resources to improve the portfolio's ability to identify and minimise modern slavery risks in procurement activities.
- Supply chain mapping activities to assess supply chain security, stability and robustness, which assists with wider supply chain awareness, and ensuring the portfolio is contracting with reputable suppliers.
- Tailoring approaches to market and tender evaluations to include appropriate modern slavery considerations, modern slavery risk management plans, and supplier questionnaires.
- Using suppliers' public information, supplier releases, policies and practices to form part of the modern slavery assessment processes.
- Using risk assessments to guide the implementation of appropriate risk mitigation strategies such as implementing appropriate contract clauses and contract management activities into the final contract (including flow down obligations to subcontractors) as required.
- Establishing a contract management framework, to cover a range of actions and through life obligations in relation to modern slavery including ongoing risk assessments, training, grievance mechanisms, reporting requirements, remediation, and management obligations.
- Active supplier engagement. Suppliers are made aware of modern slavery expectations during the approach to market, continuing through to contract signing and ongoing contract management activities.
- Staff training and professionalisation. Officials involved in procurement and ongoing contract management were encouraged to complete the modern slavery e-Learning module course, resulting in greater awareness and identification of modern slavery risks earlier in the procurement lifecycle.

It is acknowledged that business units within the portfolio managing areas of high modern slavery risk are more mature in modern slavery risk identification and have established frameworks and formalised processes and measures in place to prevent modern slavery incidents including control plans, schedules, checklists, and audits.

Response

Training and awareness-raising activities

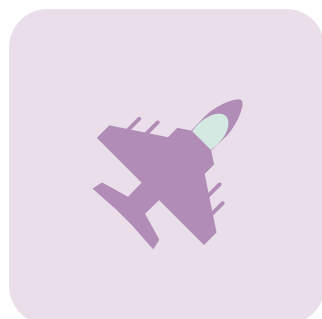
The modern slavery e-Learning modules was introduced into Defence's learning platform in April 2024. Whilst not mandated, the 2024–25 financial year completion rate for this course was 195% higher than last financial year with an additional 710 officials undertaking modern slavery training across the portfolio.

Central procurement teams within the portfolio also attended the IDCP. The central teams provide subject matter expertise and assistance to procurement teams to identify, assess and address modern slavery risks. Activities undertaken during 2024–25 include knowledge sharing, direct guidance, and tailored responses to achieve modern slavery due diligence in a proportional and practical manner.

Several portfolio officials attended the International Contracting Officers Forum in May 2025, discussing challenges and proactive steps in addressing modern slavery risks in government procurement and supply chains across 7 thematic areas: activity/design; training/expertise; collaboration/information sharing; capability/processes; measuring benefits/value; priorities/incentives; and evidence of modern slavery in government procurement and supply chains.

Officials also received regular updates on modern slavery risks and risk management approaches via the Commonwealth Procurement Community of Practice, and internal forums.

Suppliers are also provided with modern slavery information, including links to resources through RFT documentation and industry briefings.



Procurement and contract management

Defence portfolio entities continue to review existing policy and practices to build staff capability and increase awareness on addressing modern slavery risks. This includes monitoring and maintaining intranet pages containing links to the Modern Slavery Toolkit and other educational resources, and delivering procurement information sessions to reinforce officials understanding of procurement obligations and how modern slavery risks can be considered throughout the procurement lifecycle.

Business units within the portfolio are required to apply practical and proportional due diligence to assess procurement risks, including modern slavery and the risk of harm to people. The identified known areas of high modern slavery risk are a starting point, not a defining rule and during the risk assessment process additional risks within expected supply chains are also reviewed. Risks continue to be assessed during contract management and disposal to ensure the whole procurement lifecycle is considered.

Modern slavery is a regular agenda item at Defence's procurement and contracting governance board meetings. This board manages the configuration control of new and existing Commercial Framework documents to meet Defence and legislative requirements with a focus on improving the efficiency and effectiveness of Defence procurements.

The portfolio also continues to review and update endorsed contracting templates, standing offer deeds for panels and strategic heads of agreement with suppliers, to maintain alignment with modern slavery model clauses.

Supply chain transparency is increasing through the completion of several supply chain mapping activities for both acquisition and sustainment projects.

Formal evaluation activities are being leveraged to ensure credible assessments of potential suppliers are conducted prior to contract execution, using resources such as the Modern Slavery Statements Register, supplier questionnaires, and risk management plans. Specialist assistance from the central procurement team is provided to support evaluation teams.

Supplier activities

Defence portfolio entities clearly communicate expectations on modern slavery through tender processes and contractual arrangements. Opportunities to engage with suppliers, particularly during negotiations and contract management activities, are utilised to understand modern slavery risks.

Defence conducts regular and routine physical audits of manufacturing locations to give confidence to portfolio officials that suppliers can demonstrate the actions and processes they have in place to minimise and address risks of modern slavery in their supply chains.

Further, Defence conducts routine engagement with suppliers to promote the importance of modern slavery legislation. An example of this is within the Capability Acquisition and Sustainment Group, where the team responsible for the procurement of ADF clothing and footwear have integrated a Modern Slavery Compliance Statement into all contracts. This routine engagement with suppliers ensures a common understanding of legislative compliance and ethical workplace practices.

During this reporting period, there was an increase in discussions regarding modern slavery in contract management meetings, demonstrating growth across the portfolio of strengthened governance arrangements, especially in manufacturing and materiel areas.

Through its contractual engagements and clearly communicating expectations on modern slavery, the portfolio has noted that a number of contractors with modern slavery obligations are focused on raising internal awareness and enhancing their modern slavery compliance programs. Initiatives include developing specialised training for employees, and establishment of modern slavery committees to assist with implementing the necessary plans and strategies to achieve the company's modern slavery commitments.

Response activities

Defence facilitated a series of workshops between selected suppliers and the Attorney-General's Department to inform the development of a modern slavery risk case study. The focus of the workshops was to gain an understanding of how a previously reported modern slavery instance was managed and resolved by exploring the key steps taken to address the issue. A review into the challenges faced by each of the key stakeholders involved (i.e. the Commonwealth, contractor and subcontractor) provided key learnings that can be applied across the Commonwealth for future incident management.

The Defence portfolio is not aware of any incidents requiring a response in 2024–25, or of any supplier responses to potential or actual instances of modern slavery. However, if at any time a contractor becomes aware of modern slavery practices in their operation or supply chain used in its performance of the contract, the contractor has contractual obligations to, as soon as reasonably practicable:

- Notify the Commonwealth of the modern slavery practices and provide any relevant information requested by the Commonwealth.
- Take all reasonable actions to address or remove these practices, including addressing any practices of other entities (including subcontractors) in its supply chains, where relevant.
- Take all reasonable steps to remediate any adverse impacts caused, or contributed to, by the Contractor from these practices in accordance with the *United Nations Guiding Principles on Business and Human Rights*.
- Consult with the Commonwealth about the contractor's actions and steps.
- Provide updates to the Commonwealth of its progress in addressing or removing the practices and remediating the adverse impacts, on a regular basis, and as otherwise requested by the Commonwealth.

Defence has a number of grievance mechanisms available to allow affected stakeholders to raise complaints or concerns about Defence procurement, including modern slavery. This includes the:

- Defence Procurement Complaint Scheme, which investigates procurement complaints regarding procurement processes undertaken by Defence.
- Public Interest Disclosure Scheme, which provides a means to report suspected misconduct by public officials under the *Public Interest Disclosure Act 2013*.

Outcomes

Measuring effectiveness

Defence actively monitors completion of modern slavery training. In 2024–25 there has been a significant increase (195%) in the completion rates of modern slavery e-Learning modules.

Modern Slavery training informs portfolio officials of modern slavery risks and the support and tools available to identify and manage modern slavery incidents that may occur during the procurement life cycle.

Defence has continued to improve procurement and contract management practices. This includes greater utilisation of supply chain mapping and other tools and resources. Defence utilises resources such as the Global Slavery Index, the Responsible Sourcing Tool, and the Modern Slavery Statements Register, to consider the general risk profile of the procurement and the risk profile of potential suppliers relating to modern slavery compliance.

Model clauses incorporated in Defence's endorsed contracting templates place obligations on Contractors to take reasonable steps to identify, assess and address risks of modern slavery. Regular and routine engagements with Contractors ensure a common understanding of, and compliance with, expectations of modern slavery risk management.

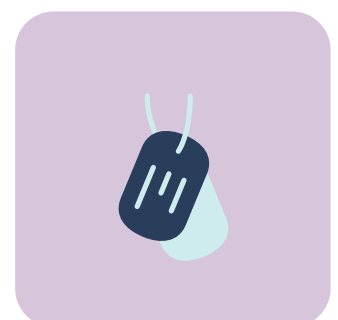
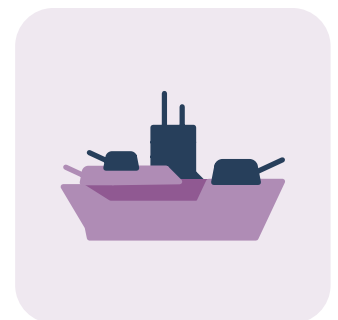
Going forward, Defence will continue to monitor its actions by reviewing procurement and contract management practices, training completions and general awareness to ensure these actions continue to be effective.



Looking forward

The portfolio's planned actions for the next reporting period include the following:

- Continued engagement with the Attorney-General's Department to strengthen the Modern Slavery Toolkit for addressing modern slavery and support the implementation of the Australian Government response to the statutory review of the Modern Slavery Act.
- Promoting and monitoring the uptake of modern slavery training particularly for procurement officers and contract managers.
- Developing guidance to support the assessment of Modern Slavery Risk Management Plans during tender evaluation.
- Improving awareness and support for the ongoing monitoring of modern slavery risk during the contract period, including available mechanisms for reporting grievances and incidents.
- Mapping and identifying opportunities and potential risk exposures in supply chains. This includes reviewing supply chains that have already been mapped to identify lessons learned.



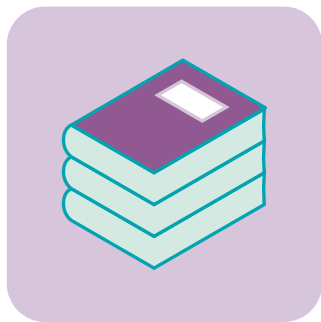
Education

The Education portfolio's purpose is to create a better future for all Australians through education. The Education portfolio included 3 NCEs during the reporting period:

- Department of Education
- Australian Research Council (ARC)
- Tertiary Education Quality and Standards Agency (TEQSA).

The portfolio's 5 areas of highest contract value were:

- education and training
- management advisory services
- temporary personnel services
- computer services
- research programs.



Risks

The Department of Education has a Memorandum of Understanding (MoU) with the Department of Employment and Workplace Relations (DEWR) for the supply of services covering a wide range of items including office premises, security and access control, cleaning, ICT services, software, hardware, and related systems. The Department of Education, therefore, does not directly manage the supply contracts for these services and relies on DEWR to identify and manage any associated modern slavery risks and compliance issues during the procurement stage.

Both ARC and TEQSA manage cleaning services through JLL. JLL works closely with downstream vendors through a formal ongoing vendor management framework and due diligence audits. These place a focus on ensuring compliance with relevant modern slavery legislation.

JLL addresses modern slavery risks through an industry-leading framework as well as the robust procedure outlined in this submission. These initiatives include:

- Ethics Everywhere program, which embraces and promotes strong principles of business and professional ethics at every level of their company
- Code of Business Ethics, which specifically prohibits modern slavery activities
- Vendor Due Diligence Policy, which prohibits doing business with suppliers engaging in illegal practices
- Global ESG Sourcing and Procurement Policy
- Human Rights Policy
- Corporate Governance policy addressing Anti-Slavery and Human Trafficking
- contractual provisions requiring suppliers' commitment to ensure there is no modern slavery or human trafficking in their organisation or supply chains
- high-level risk assessment to identify high-risk employment sectors and geographies
- collaboration with clients and NGOs to learn and implement best practices
- training for suppliers through 'OnSite'
- training for high-risk business lines
- periodic communications to raise awareness
- annual reporting on progress in their Modern Slavery Statement
- JLL Global Modern Slavery Committee meetings.

JLL assess suppliers to understand their inherent risk based on the below risk characteristics:

- Workplaces with hazardous, low-skilled, seasonal, or low-paying work.
- Industries with high resource demands, multi-tiered supply chains, or high quantities of materials or parts.
- Industries with a large labour force, no unions, outsourced recruitment or fees placed on workers.
- Regions with limited regulation, high levels of corruption and low levels of education.
- Suppliers where prices are too cheap or where there are sudden changes in demand.

The category of service identified with the highest risk profile is cleaning. To mitigate the risk and ensure there are no instances of negligence with regards to the supply of labour, JLL have developed a robust cleaning services framework.

To manage the risk as part of tender submissions the vendors have confirmed acceptance of the following items:

- Adherence in payment to staff in meeting the Fair Work Modern Award.
- CAF.
- JLL's contractual supplier agreements includes compliance with modern slavery requirements.

The purpose of adhering to an industry standard as set by CAF is to ensure cleaning employees are paid at the modern award. JLL has developed a leading industry pricing schedule and analytics to ensure there is no under payment of employees in the delivery of cleaning services.

JLL impose strict anti-modern slavery contractual obligations on their suppliers. This includes a commitment to abide by their global Human Rights Policy, which prohibits violations of human rights anywhere in their operations or our supply chains. This also includes their Vendor Code of Conduct, which requires suppliers to comply with modern slavery laws and refrain from engaging in modern slavery practices, including forced labour, and human trafficking.

JLL manages all downstream suppliers via their Vendor Management Framework and Vendor Code of Conduct, which include, among other items, compliance statements from vendors confirming their adherence to modern slavery legislation. JLL has audit rights into their vendor financial statements and employment contracts that are reviewed as part of the Vendor Management Framework to limit risk around employment conditions.

Example actions regarding identification and assessment of risk

Example 1:

The Department of Education entered into grant agreements in which it identified potential risk of modern slavery due to the potential of the higher education and vocational education and training sectors in using work integrated learning, and of some of the industries making practical learning available to students who would receive benefit from the grants. The risk was assessed as low due to requirements of the *Higher Education Support Act 2003*, that included protections for the safety and wellbeing of students.

Example 2:

Due diligence actions were undertaken to assess the risk of modern slavery associated with a grant recipient from grant program administered by the Department of Education due to identification of use of unpaid internships in their course structure program. The risk was assessed as low as the course outline was clear in its use of internships to support industry learning and due to the regulatory environment of the grant recipient.

Response

Training and awareness-raising

Over the reporting period, the portfolio continued to commit to training and awareness through actions including, but not limited to, those described below.

Encouraging all portfolio staff to complete the modern slavery e-Learning modules irrespective of whether they have a role in procurement activities. Through completion of the e-Learning modules, staff have indicated that they have developed a stronger awareness and understanding of modern slavery risks, and increased competency to manage modern slavery risks in the procurement process.

The Department of Education procurement team is actively engaged with the IDCP. The department worked with Commonwealth, state and territory agencies in conducting its work, including the Office of the Fair Work Ombudsman. This collaboration aimed to raise awareness among international students about their workplace rights and where to seek assistance, as well as to promote resources to education providers, education agents and student services to help combat workplace exploitation.

In addition, through an International Education Innovation Fund (IEIF) project, the Department of Education collaborated with Deakin University to develop best practice international student engagement guides for students and providers about work-integrated learning, outlining positive approaches to international student employability and learning/work opportunities (e.g. internships), including their rights and conditions, and the role of the Fair Work Ombudsman.

The guides also draw attention to the legislated obligation for providers to deliver an orientation program to students which includes information for international students about their employment rights and conditions in Australia, and how to resolve workplace issues such as through the Fair Work Ombudsman (Standard 6 of the *National Code of Practice for Providers of Education and Training to Overseas Students 2018*).

Other actions included:

- ARC senior leadership group receiving a presentation on modern slavery in public procurement.
- ARC providing their staff with compliance training concerning contracts, procurement and probity, including modern slavery, and raising awareness of the Modern Slavery Toolkit.
- The ARC engaging with ICT procurement through regular discussions on procurement requirements, including procurement risks.
- TEQSA delivering general procurement and contract management training to all staff in August 2024, including how to identify and action modern slavery risks.

Procurement and contract management

During the reporting period, the portfolio engaged in procurement and contract management activities to address risks of modern slavery, including, but not limited to:

- Updating the Department of Education's Modern Slavery Risk Plan, which maps out modern slavery risks, relevant risk rating, and mitigation actions. The plan is reviewed annually, and staff are encouraged to include modern slavery risks and treatments in the plans they create, where applicable.
- Using the Department of Education Procuring Official Checklist, which includes a modern slavery section.
- Using the Department of Education Long Form Services Contract template which includes a modern slavery clause, included in contracts where modern slavery risks are identified.

In addition, Education portfolio agencies undertook the following activities during the reporting period:

- The Department of Education introduced an annual Commonwealth Contract Compliance Statement, which requires suppliers to confirm that they have adhered to mandatory Commonwealth legislation and policy that may apply to the delivery of goods and/or services set out in the contract.
- TEQSA updated its procurement manual to include the identification and management of risks pertaining to modern slavery.
- The ARC introduced a Procurement Framework that includes modern slavery risks.
- The ARC having a risk management framework to enable and support proactive risk management across the agency. This includes biannual operational risk reviews where procurement risk and controls are assessed. In 2024–25, these risk reviews were undertaken in November 2024 with the June 2025 review delayed until July 2025.
- In addition to general procurement risk, the ARC is also managing the risk of modern slavery through a specific risk 'Supplier to the ARC is in breach of the Modern Slavery Act'.
- The ARC's governance team forwarded ANAO performance audits and findings to relevant areas of the agency, including where there are findings in relation to procurement and/or modern slavery. This is also reported to the ARC Audit and Risk Committee.

Case example

During the reporting period, the Department of Education entered into contracts with the University of Queensland (UQ) and Mining Skills Australia for the design of curricula and piloting of short mining training courses for Latin America. In undertaking the procurement, staff drew on the training and modern slavery risk guidance to provide adequate controls through contract management for Commonwealth funded activities delivered offshore.

These contracts apply risk categories for sector and industry risks, geographic risks and product and services risks, as these contracts are related to the mining industry in Latin America. These risks have been addressed through both contracts containing modern slavery clauses, and the department is actively working with the contractors on the selection of training participants with local reputable partners.

UQ has legislated requirements under the Modern Slavery Act. Mining Skills Australia is a Registered Training Organisation (RTO) and required to meet the 2025 Standards for RTOs, enabled by the *National Vocational Education and Training Regulator Act 2011* (Cth), with standards relating to student wellbeing.

Supplier activities

The portfolio continued to assess contracts for modern slavery risk and invite suppliers to complete the Supplier Questionnaire. In addition, the portfolio undertook the following supplier activities:

- Clearly communicating expectations to our suppliers, including by ensuring modern slavery issues are specifically addressed in supplier contracts and other relevant mechanisms.
- For circumstances when using smaller suppliers where the supply chain is obscure, the Modern Slavery Toolkit is consulted for guidance and supplier is queried and required to complete questionnaire where appropriate.

Response activities

The department, ARC and TEQSA have complaint websites that detail how to make a complaint, including online complaint forms and email addresses. Additionally, the department's complaints website includes information on emergency support services.

No potential or actual instances of modern slavery, or increased risks, were identified within the portfolio or the portfolio's supply chain in 2024–25.

Outcomes

Measuring effectiveness

During the reporting period, outcomes included, but were not limited to:

- Increased engagement across NCEs, including participation in various workshops throughout the reporting period, aimed at tackling modern slavery at a whole-of-government level.
- Increased awareness and understanding of modern slavery risk leading to improved competency to manage modern slavery risks in procurement processes and supply chains.

Looking forward

The portfolio will:

- Continue to focus on awareness of modern slavery risks in its activities and identifying modern slavery risks in supply chains.
- Focus on increasing engagement with suppliers in identified high-risk areas for potentially at-risk individuals, for example international students or vulnerable students.
- Continue to analyse contracts for areas of potential modern slavery risk and invite suppliers to complete the Supplier Questionnaire to help increase supply chain transparency.

TEQSA is in the process of reviewing and updating its procurement framework, including guidance and forms to include consideration of modern slavery risks during the procurement process.

The ARC is considering the introduction of a mandatory modern slavery e-Learning module for all staff.

Employment and Workplace Relations

The Employment and Workplace Relations (EWR) portfolio enables access to quality skills, training and employment to support people in Australia to find secure work in fair, productive and safe workplaces, supporting individuals and the nation to prosper. The portfolio included the following NCEs:

- Department of Employment and Workplace Relations
- Asbestos and Silica Safety and Eradication Agency (ASSEA)
- Australian Skills Quality Authority (ASQA)
- Fair Work Commission (FWC)
- Office of the Fair Work Ombudsman (OFWO)
- Safe Work Australia (SWA)
- Seafarers Safety, Rehabilitation and Compensation Authority (Seacare Authority).

The portfolio works actively to fill skills gaps to support Australia's economic growth by identifying industries with skill shortages, including in emerging industries fundamental to the prosperity of individuals, businesses, and our nation. Additionally, it is responsible for:

- strategic planning to prevent asbestos exposure
- developing policy on work health and safety
- regulating vocational education and training providers
- promoting harmonious, productive, cooperative, and compliant workplaces
- regulating registered organisations and resolving workplace issues.

The majority of the supplier spend by the portfolio was by the DEWR. The 5 areas of highest procurement contract values across the portfolio were:

- education and training services – \$481 million
- employment services – \$410 million
- computer services – \$165 million
- components for information technology or broadcasting or telecommunication – \$60 million
- property management services – \$52 million.

Like the previous reporting period, the portfolio seeks to increase procurement efficiencies by:

- accessing cooperative procurements such as panel arrangements established by other Commonwealth agencies such as the DTA Marketplace
- using WoAG coordinated procurement initiatives, where applicable
- utilising the CCS where no existing panel arrangement exists.

By using these arrangements, the portfolio complies with the obligations under the CPRs and via contract terms under Head Agreements between the lead agency and the supplier. For example:

- DEWR uses bespoke contracts for some procurement activities, noting that bespoke contracts are required to be developed in consultation with the legal area within the department. Bespoke DEWR contracts contain standard modern slavery clauses.
- Where required, the OFWO also adds its own model clauses and terms that require compliance with workplace laws, including the Fair Work Act and the Modern Slavery Act.



Risks

Each portfolio entity has identified and assessed key risk area through review of their existing contracts.

- Modern slavery risks may be present in the supply chains of ICT hardware procured by the portfolio. ICT hardware products may be linked to modern slavery due to the way they were produced and provided. ICT supply chains are complex and involve many parties in the value chain as manufacturing and operations are often located in different countries where governance may be less rigorous, resulting in risks of human rights violations.
- Cleaning services, general facilities management and property leases are identified as risk areas for modern slavery in government procurement across the portfolio.
 - PSPs are appointed under WoAG arrangements and sometimes landlords procure, manage and monitor the downstream contracts on behalf of the government.
 - Where DEWR is able, DEWR will procure its own cleaning services for its tenancies through the PSP to better ensure compliance with the Protective Security Policy Framework and Procurement Connected Policy requirements. This procurement model presents risks of modern slavery by the use of low-skilled, or seasonal labour by their downstream contractors, which could lead to the exploitation of migrant status and the use of unauthorised subcontractors.
- Facilities management arrangements pose modern slavery risks across the portfolio. In these arrangements, the responsible PSP normally manages the engagement of any subcontractors and/or other services under the current WoAG Property Services Coordinated Procurement arrangement.
- Procurement of office furniture and fittings has also been identified as a risk, particularly where these products are manufactured in countries with poor governance and conflicts.
- DEWR Employment Services is a high-risk area based on the scope, scale, complexity and high values of the relevant arrangements under this program.

While not specifically related to procurement activity, DEWR acknowledges risks within the Pacific Australia Labour Mobility (PALM) Scheme and has a range of processes in place to identify workers at risk of harm—including potential modern slavery practices. These include systems to assess employer suitability, actively monitor risk and undertake compliance action. Furthermore, critical incident notifications and response, monitoring visits, compliance visits, welfare visits, a 24/7 worker support line are in place. These processes do not explicitly refer to modern slavery risks; however, they identify risks and issues which could suggest potential risks of modern slavery. This complements similar protocols such as child safety and family and domestic violence responses.

PALM scheme workers who disengage from the scheme are in breach of their visa conditions. They cannot access the protections offered by the PALM scheme, including PALM scheme employer obligations set out in the PALM scheme Deed and Guidelines, and may become more at risk of modern slavery.

ASQA's risk profile is low. This is primarily due to the nature of its procurements, which are typically low in value and volume, and are intra-government arrangements such as shared services. For other procurement activities, ASQA predominantly utilises established panel arrangements. Risk is further mitigated through proactive engagement with direct suppliers to gain visibility into their subcontracting arrangements, ensuring transparency and accountability throughout the supply chain.

SWA's risk profile is also low. This is primarily due to the nature of its procurements, which are typically low in value and volume. The Agency predominantly utilises WoAG arrangements, established panel arrangements and inter-government arrangements.

The actions taken across the portfolio vary between entities in response to the specific risks identified. The following summarises those actions to identify risks within procurements during the reporting period:

- At DEWR, for ICT goods and services, preference is given to market approaches under the Hardware Marketplace panel as opposed to other arrangements. The DTA panel requires registered sellers to comply with DTA's policy requirements under the Head Agreement. This approach assists procurement and contract managers to ensure that the suppliers can be held accountable if any modern slavery practices are uncovered during the contract management phase.
- In its ICT procurement practice, DEWR also reviews any identified risks from previous contract arrangements with the same provider.

The vast majority of FWC's procurements are conducted through established panels and the DTA marketplaces. However, on the limited occasions where the FWC engages the open market or seeks direct quotes, and they identify a high risk for potential modern slavery issues, they undertook actions such as reviewing vendors' modern slavery statements, directly engaging suppliers on relevant concerns, and raising internal awareness of modern slavery risks within the organisation.

Consideration of modern slavery risk is assessed as part of the OFWO's procurement processes, including when planning procurements and selecting suppliers. The OFWO's procurement policies require officials to make reasonable enquiries that the procurement is carried out with consideration to relevant regulations and/or regulatory frameworks including, but not limited to, supplier's practices regarding labour regulations and ethical employment practices. Additionally, OFWO suppliers are required to monitor and manage their supply chains to ensure they are complying with all relevant requirements of the Fair Work Act, the Modern Slavery Act, and other applicable workplace laws.

The ASSEA only undertakes a small number of procurements annually and has assessed a low risk in the procurement of low value merchandise for distribution at events. Identification of risk is undertaken through central oversight of procurement and contracts, identifying activities that may be exposed to modern slavery risk. For the risk identified above, reputable suppliers who can identify their supply chain are generally used.

ASQA leverages WoAG procurement arrangements, and the inherent protections within coordinated procurement Head Agreements to mitigate modern slavery risks.

SWA conducts low-risk low value procurements. Identification of modern slavery risk is through central oversight of procurement and contracts considering Attorney-General's Department's guidance, and consideration of contracts against risks identified in portfolio and WoAG arrangements assessments.

Response

Training and awareness-raising

The training provided across the portfolio varies between entities in response to the specific risks, nature of the workforce and number of people undertaking procurement activities.

The portfolio carried out the following training and awareness-raising activities:

- DEWR's intranet includes links to information on modern slavery to provide awareness and assist those undertaking procurements. DEWR added the modern slavery e-Learning modules to LearnHub on the intranet. This module is mandatory for ICT Procurement officers and promoted internally as desirable for other staff undertaking procurement activities. DEWR is driving increased take-up of the training by having direct access, and increased communications via the intranet and newsletters. From 2025–26, useful data can now be captured on what staff and branches have completed the training, meaning future communications can be targeted if required.
- All staff in DEWR's Pacific Labour Operations Division are trained to identify modern slavery risks. The 'Look A Little Deeper Human Trafficking and Slavery' program is mandatory for all staff in the division. The training was developed by the AFP to help state and territory police, and other Commonwealth agencies recognise signs of human trafficking and slavery type offences in the community and report suspected cases to the AFP. The Pacific Labour Operations Division also undertakes proactive stakeholder education, assurance and contract management activities to ensure compliance. This includes education about modern slavery and identifying risks.
- At ASSEA, staff training is based on need and provisioned through the e-Learning resources available on the Modern Slavery Register website.
- The FWC continued to use the e-Learning modules available on the Modern Slavery Statements Register to build staff capability in identifying and addressing modern slavery risks. Staff involved in procurement and purchasing activities were encouraged to complete the e-Learning modules.
- At OFWO, e-Learning modules were provided to Fair Work Inspectors and all OFWO staff on the topics of human trafficking and modern slavery over 2024–25. Fair Work Inspectors undertook this training to be aware of what human trafficking and modern slavery is, and the indicators to be aware of. The OFWO's intranet also provides detailed information about human trafficking and modern slavery and staff are provided with information to escalate or report any such conduct to the AFP.

- At ASQA, Procurement Team members attended modern slavery virtual sessions hosted by the Attorney-General's Department. ASQA ensured its line areas understood procurement policy considerations, including modern slavery when undertaking new procurements. ASQA's staff undertook general procurement training, which includes elements relating to modern slavery risks.
- SWA made the modern slavery e-Learning modules available to relevant staff involved in procurement and contract management.

Procurement and contract management

The following procurement and contract management actions were undertaken across the portfolio during 2024–25:

- The majority of DEWR's current property leases and arrangements with landlords are established in accordance with the WoAG Leasing Strategy, and under Commonwealth National Leases. Under these arrangements, PSPs are also required to ensure that all lessor arrangements for facilities management meet all Commonwealth Standards as part of their property management obligations.
- DEWR's new RFT templates include a detailed statement advising that respondents must comply with the Modern Slavery Act and the department's expectations. It also states that the department may require tenderers to provide any relevant information on request, and advise of any awareness of modern slavery practices, if applicable. These requirements are also communicated to tenderers during the procurement process via the draft deeds the department publishes along with tender documents. The department actively monitors provider's compliance with deed requirements.
- DEWR uploaded the Modern Slavery Toolkit on its intranet to assist contract managers in the decision-making process when purchasing equipment. DEWR's legal team also reviewed the RFT template, Long Form Services Contract Templates and Employment Services Deeds to ensure they reflect the modern slavery contract clauses.

Specific procurement teams within DEWR also took targeted actions, including:

- DEWR's ICT Procurement team continues to ensure the modern slavery contract clauses are included in all ICT hardware procurement contracts including where the procurement was conducted outside a panel arrangement.
- The Employment Services Procurement team at DEWR incorporates modern slavery contract clauses. Tenderers are required to upload details of how their organisation will identify, assess and address risks of modern slavery practices. This information is considered in the evaluation phase. All employment service deeds that commenced from 2022–23 onwards, include modern slavery contract clauses, and require the submission of modern slavery statements for relevant providers, that apply to all contracted providers. Lastly, contract management activities include the identification of relevant providers and monitoring compliance with the submission of a modern slavery statement to the Modern Slavery Statements Register.

The PALM scheme employer Deed includes a clause related to modern slavery (clause 86) that ensures that a PALM scheme employer:

- Has no knowledge of any modern slavery offence that has occurred or is occurring in its operations or supply chains.
- Takes reasonable steps to identify the risk, and prevent the occurrence, of any modern slavery offences in its operations and supply chains and comply with any modern slavery law.
- Notifies DEWR as soon as practicable, and no later than 5 business days after becoming aware, of any modern slavery offence or alleged modern slavery offence in its operations or supply chains.
- Prepares a modern slavery statement and submit it to the Modern Slavery Statements Register if their consolidated revenue is \$100 million or more for a reporting period.

The ASSEA's modern slavery risks are managed by using the CCS (or similar, for example DTA Marketplace contracts) to ensure standard clauses, terms and conditions, are consistent with government policy and practice.

The vast majority of FWC's procurements use panels and marketplaces. However, on those few occasions where they are approaching the open market or seeking quotes for goods and services valued under the procurement threshold, and they identify a high risk for potential modern slavery issues, the FWC may directly question suppliers on issues relating to modern slavery. This can include obtaining policies and processes (if any) they have in place to respond to modern slavery risks, and/or use the Modern Slavery Toolkit to guide each stage of the process for considering modern slavery risks within the existing Commonwealth procurement framework.

The FWC continued to assess and refine its procurement policies and contracting systems to support compliance with modern slavery legislation and ethical sourcing practices by using tender and contract documents prepared by the Department of Finance, including the CSS or the department responsible for managing specific procurement panels and marketplaces, including the DTA. The FWC ensures its approach to market and contract documents and work orders include modern slavery provisions.

The OFWO's procurement policies are being refreshed to require officials to consider if there are risks of modern slavery within the potential supplier's operation and supply chain, when planning a procurement.

ASQA's procurement team worked with its line areas to ensure they understood procurement policy considerations, including the management of modern slavery risks.

SWA relies on the use of CCS, WoAG and established panel arrangements to ensure appropriate clauses, terms and conditions are consistent with government policy and practice. SWA commenced a review of procurement and contract management policies to identify any gaps in addressing modern slavery risks. Work is underway to embed practical considerations of modern slavery risk into procurement planning, risk assessments, and contract management practices, proportionate to the SWA's size and risk profile.

Supplier activities

For 2024–25, the following activities were undertaken to promote supplier engagement:

- DEWR continues to engage with stakeholders focused on human rights within supply chains, supporting ongoing dialogue and enhanced collaboration around the PALM scheme's role in supply chain practices.
- The FWC used tender and contract documents prepared by the government and clearly communicated their expectations to suppliers to ensure modern slavery issues are specifically addressed in supplier contracts.

Response activities

The portfolio's response activities for the reporting period included:

- At DEWR, all hardware contracts prior to engagement with the vendor, include the approved modern slavery clause to mitigate risks within the supply chain. Through this avenue vendors can respond to the department if any issues are raised.
- The PALM scheme grievance management policy was implemented in the previous financial

year and was developed in consultation with stakeholders to support the resolution of unresolved concerns between PALM workers and their employers. The grievance management policy provides clear information and guidance outlining how the department will manage grievances of PALM scheme workers to ensure they are managed in a way that is fair, accessible, responsive, efficient, and integrated within the PALM scheme's core business.

- PALM Regional Engagement Forums (PREFs) have been delivered in the communities of Coffs Harbour, NSW, Ulverstone, TAS, Busselton, WA, and Mareeba, QLD, in the 2024–25 financial year. PREFs are attended by PALM scheme workers, employers, and supporting stakeholder representatives. PREFs have been a key platform to proactively deliver in person information on the supports in the PALM scheme, including specific information on the grievance management process, PALM scheme settings, safeguards and workers' options for recourse. PREFs highlight the roles and supports available through PALM scheme partners including Country Liaison Officers, preferred health insurance providers and Community Connections. PREFs are also an opportunity for workers to be informed about local community supports including Police, health services, not for profit community organisations and local and state government services.
- DEWR established the PALM scheme Interdepartmental Disengagement Taskforce (the Taskforce) to better prevent, deter, detect and respond to disengagement.
- DEWR and OFWO's procurement processes include avenues for complaints and grievances regarding the procurement and contract process as required, in accordance with the CPRs.
- The OFWO maintains multiple access points including a contact centre where members of the public including workers and employers can contact the OFWO seeking information about modern awards, employee entitlements and request assistance regarding workplace disputes.
- The OFWO's Fair Work Inspectors (FWIs) may interact with victims and perpetrators of human trafficking and modern slavery whilst undertaking their duties. The FWIs are aware of the indicators of human trafficking and modern slavery, and report suspected cases to the AFP when they encounter them.
- ASSEA has processes in place for staff, stakeholders, suppliers and the public to raise concerns with the activities of the organisation, including feedback mechanisms for tender/procurement activities and within contracts.

No potential or actual instances of modern slavery were identified by any of the portfolio entities.

Outcomes

Measuring effectiveness

The portfolio has assessed its effectiveness in addressing modern slavery risks over the reporting period by undertaking the actions below.

- DEWR has identified ICT and Employment Services as key areas of modern slavery risk. Both areas demonstrate advanced processes and maturity in managing these risks. Employment Services benefit from strong legal oversight in the establishment of panels and contracts, while ICT risk management is supported by significant involvement from the DTA. DEWR has assessed that robust control measures are in place across these high-risk areas. The department will continue to monitor progress by tracking the completion of the e-Learning.
- The FWC considers the actions undertaken to be effective in addressing modern slavery risks over the 2024–25 reporting period. Most of the procurements occur through government panels and marketplaces that embed modern slavery safeguards. Given the limited expenditure on discretionary items, FWC has a low risk profile for modern slavery risks.
- The requirement to identify subcontractors and to comply with the Modern Slavery Act are a requirement of the OFWO procurement process. The standard inclusion of such clauses has increased awareness of the issue which leads to minimisation of risks and more effective outcomes.
- At ASSEA, the effectiveness relies on sufficient preparatory work when undertaking a procurement along with the contract manager maintaining situational awareness through regular contract management processes.

The portfolio will assess how effective its above actions have been to address modern slavery risks in future reporting periods:

- DEWR's ICT Procurement team will continue to review purchases throughout the financial year and identify any opportunities for reporting improvement measures going forward.
- In 2025–26, the OFWO will continue to review its procurement risk procedures and finalise templates and procurement guides to ensure that our procurement activities appropriately address modern slavery risks.
- The PALM scheme grievance management policy that was implemented on 15 January 2024, assisted with data collection to better understand the effectiveness of the process.
- As of 31 May 2025, DEWR received 185 grievances related to the PALM scheme which cover a range of concerns including claims of unfair dismissal, mistreatment, low hours, incorrect payment, injuries, women's safety concerns and general misunderstandings between the worker and employer. As of 31 May 2025, 153 of these cases have been resolved; with the remainder still being investigated.
- DEWR has streamlined disengagement and re-engagement requests from a central coordination point with the aim to develop a PALM scheme re-engagement policy in 2025–26.
- As part of a review of procurement processes, SWA is exploring practical ways to assess the effectiveness of its approach in proportion to the level of identified risk. Options include reviewing procurement processes, tracking staff training completion, and monitoring supplier performance where appropriate. SWA will also consider developments in Australian Government guidance to inform continuous improvement.



Looking forward

DEWR will continue to explore strategies for improvement measures such as:

- including additional information in tender documents prior to market approach
- referring key internal stakeholders to information on the department's website
- assisting with risk assessments prior to market approach.

DEWR intends to boost take-up of the modern slavery e-Learning modules on LearnHub by increased communications via the intranet and newsletters. From 2025–26, useful data can now be captured on what staff and branches have completed the training, meaning future communications can be targeted if required.

DEWR will continue to ensure modern slavery clauses are included in ICT hardware procurement requests where applicable. Also, the team will consider improvement measures going forward and liaise with business areas to pass on knowledge and ensure additional considerations when researching products to be purchased from overseas, prior to raising the procurement request.

DEWR will participate in the Senior Officials Meeting of the National Roundtable on Human Trafficking and Slavery and contribute to strategic discussions on combatting exploitation of migrant workers in Australia.

DEWR's central procurement team aims to disseminate regular correspondence on modern slavery in procurement via intranet notices and internal Community of Practice training/meeting sessions.

DEWR will actively monitor participation in the training and target communications as required moving forward.

In addition, raising awareness within DEWR's Employment Services Purchasing about modern slavery resources and encouraging the completion of the e-Learning modules. DEWR will also continue to ensure its employment services contract management activities and procurement processes ensure compliance with relevant modern slavery law.

The PALM employer application requirements are currently being reviewed and updated. The revision will include specific criteria in relation to modern slavery and worker exploitation. These updates will strengthen the integrity and credibility of the PALM scheme, enabling DEWR to identify red flags early and further protect PALM workers.

Phase 2 of the PALM scheme Deed and Guidelines review will commence in July 2025. While the review is not solely focused on modern slavery, it includes a significant component of direct worker consultation. These sessions will explore PALM workers' experiences with accommodation, transport, working hours, pay, deductions, and welfare and wellbeing support.

This engagement will strengthen the portfolio's response to modern slavery risks by:

- Enhancing data collection – Insights gathered will be systematically recorded and analysed to identify patterns or indicators of potential modern slavery risks.
- Improving supplier and stakeholder engagement – The review process will involve collaboration with approved employers and other stakeholders, encouraging greater transparency and accountability in employment practices.
- Informing future risk assessments – Findings from the consultations will guide targeted risk assessments and help identify areas requiring further scrutiny or intervention.

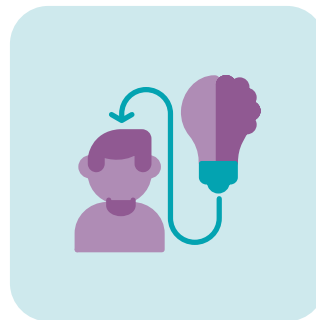
These actions will contribute to a more robust and informed approach to identifying, mitigating, and responding to modern slavery risks across the portfolio.

DEWR established the PALM scheme Interdepartmental Disengagement Taskforce to better prevent, deter, detect and respond to disengagement. The Taskforce includes government agencies involved in the PALM scheme. These actions will contribute to a more robust and informed approach to identifying, mitigating, and responding to modern slavery risks across the portfolio. Phase 2 commenced in July 2024 and focused on consultations with over 40 key PALM scheme stakeholders to identify push and pull factors for disengagement, potential trigger points which could lead to disengagement, and opportunities or recommendations that could better prevent, deter, detect and respond to disengagement. Recommendations from Phase 2 will be implemented in the 2025–26 program year.

Forward looking actions from portfolio agencies are as described below.

- ASSEA's present activities, processes and approaches are sufficient for the scale and size of ASSEA's operations.
- The FWC will investigate processes to further improve contract monitoring for modern slavery clauses during the next financial year.
- The OFWO continues to review its procurement reporting processes and procedures. Areas for improvement will focus on supplier engagement through increased awareness and discussion at the procurement planning stage, and improved risk mitigation with ICT and software contracts where the OFWO has engaged in the supplier's terms and conditions.
- Another area of improvement is to ensure more rigorous procurement risk assessments are undertaken with possible overseas supply chains. The OFWO will continue to review and maintain its tender/request for quote and contract clauses to ensure they align with the standard modern slavery clauses whilst still meeting the OFWO's requirements to ensure its suppliers comply with all workplace laws.
- The ASQA aims to include modern slavery risks in risk assessment templates, encouraging procuring officials to use the template for high-risk procurements regardless of the value. ASQA will encourage officials to consider the use of procurement panels more broadly, particularly where modern slavery provisions are embedded in panel Head Agreements. ASQA will request its Procurement Team to make modern slavery resources more accessible to procuring officials through its intranet. ASQA intends to update contracts to include, where relevant, modern slavery clauses. Also, consideration is being given to implementing mandatory procurement training for ASQA staff, which includes elements on modern slavery.
- SWA will take steps to strengthen its approach to managing modern slavery risks, appropriate to SWA's size and procurement risk profile. Planned actions include:
 - Integrating modern slavery considerations into internal procurement and contract management guidance, including risk assessment templates and planning checklists.
 - Promoting awareness across staff involved in procurement of the modern slavery e-Learning modules and sharing updated guidance when available.

These actions aim to build a more structured and proactive approach over time, while maintaining alignment with the SWA's low-risk operations and use of Commonwealth panel arrangements.



Finance

The Finance portfolio provides professional, high-quality advice, frameworks and services to achieve value in the management of public resources for the benefit of all Australians.

In 2024–25, Finance consisted of the following NCEs:

- Department of Finance (DoF)
- DTA
- Australian Electoral Commission (AEC), the Australian Government's independent electoral body
- Independent Parliamentary Expenses Authority (IPEA)
- Parliamentary Workplace Support Services (PWSS)
- Future Fund Management Agency.

These entities each play a leading role in supporting government across a wide range of strategic and policy areas, while implementing its priorities and supporting a modern public service.

The portfolio's 5 areas of highest contract value were:

- property management, construction and leasing services
- information technology and related services
- personnel and recruitment services
- advertising (supporting the WoAGs)
- management advisory services (consultancy and non-consultancy).

In 2024–25, the Finance portfolio reported to AusTender a total of **1,788 newly awarded contracts** and **1,336 amendments to existing prior year contracts** with a **combined value of \$2.08 billion**.*

At the end of 2024–25, the Finance portfolio had **1,404 active contracts**.*

** data is derived from AusTender effective as at **31 July 2025** and will change as contracts are published within and beyond the 42-day period.*

Procurement and contracting activities undertaken across the Finance portfolio support the delivery of its remit and responsibilities.

Risk

In 2024–25, the portfolio identified the following areas of potential modern slavery risk:

Building and construction

The portfolio procured **22%** of its newly awarded contracts for 2024–25 by value on building and construction related services (including contracts for lease arrangements).

- Building, construction and fit-out projects rely heavily on global supply chains for a wide range of materials, commodities, logistics, labour and services.
- As these are primarily subcontracted and managed via downstream arrangements, there is some risk that there may be exploitation of migrant workers and human rights violations present in the supply chain.
- The WoAG Property Coordinated Procurement Arrangements stipulate requirements for subcontractors to comply with the Supplier Code and modern slavery policies to reduce potential modern slavery risk.

ICT hardware and software

The portfolio procured **8%** of its newly awarded contracts for 2024–25 by value on ICT and telecommunications goods and services.

- ICT goods and services incur a higher risk of modern slavery in the downstream supply chain.
- ICT products are often manufactured in geopolitical regions with governance concerns, resulting in risk of human rights violations.
- The portfolio procures its ICT products through the BuyICT Marketplaces.
- Each marketplace includes obligations for suppliers under the common terms and conditions to identify, assess and address modern slavery practices in their operations and supply chains.



Labour and external outsourcing

The portfolio procured 21% of its newly awarded contracts for 2024–25 by value on labour hire and external workforce.

The portfolio uses the WoAG Recruitment and Search Services and Labour Hire Services arrangements (collectively, the People Panel) to procure its labour and outsourcing arrangements.

The People Panel provides a range of benefits, including:

- replacing multiple panel arrangements across government with a single panel
- a standardised rate structure, consistent with legislation and minimum awards
- improved quality, consistency and efficiency of purchasing external labour with standard terms and conditions
- a standardised performance management framework
- centralised oversight of labour hire services, including improved data capture
- ensuring that all suppliers satisfy legal obligations concerning the terms and conditions of employment or engagement for engaging an external workforce, including the Fair Work Act, the National Employment Standards, and any applicable industrial award
- cost savings and efficiencies by reducing administration and tendering efforts for service providers and across government.

Security (guarding services and security equipment) and cleaning services

The Property Coordinated Procurement Arrangements supports equitable and transparent processes for engaging security guards and cleaning staff across the Commonwealth. This includes:

- requiring PSPs to seek approval and provide greater visibility of work that is subcontracted to downstream providers
- ensuring PSPs (and subcontracted entities) satisfy the terms and conditions of employment or engagement for engaging an external workforce, including the Fair Work Act, the National Employment Standards, and any applicable industrial award
- ensuring PSPs (and subcontracted entities) satisfy the training provisions for security guarding services
- ensuring PSPs (and subcontracted entities) provide appropriate diligence and equipment to support cleaning services.

Refer to page 25 for further detail on the WoAG Property Coordinated Procurement Arrangements.

Finance remains focused on making necessary improvements to procurement frameworks and activities to ensure the Australian community's best interests are protected.

Uniforms and other promotional merchandise

The portfolio has strict guidance when procuring from the textiles industry, including:

- use of locally sourced products, where possible
- seeking confirmation of the supplier having an active modern slavery framework that focuses on worker protections, compliance with environmental legislation, and minimising imports.

Procurements for uniforms and promotional merchandise utilise standard Commonwealth contracting terms, which include obligations arising from the Supplier Code.

The portfolio appreciates there is a growing need to understand and monitor modern slavery risks across the Commonwealth's global supply chain, particularly with respect to downstream arrangements and the use of subcontractors.

Assessing modern slavery risk includes the consideration of:

- **Sector and industry risk** – certain sectors and industries have higher modern slavery risk because of characteristics, products and processes.
- **Product and services risk** – certain products and services have higher modern slavery risks because of the way they are produced, provided or used.
- **Geographic risk** – some countries have higher risks of modern slavery due to poor governance, weak law, vulnerable population, high conflict, migration flows and poverty.
- **Operational and entity risk** – some entities have modern slavery risks because of poor operational or governance structures, especially in areas of subcontracting and outsourcing where visibility and control is reduced.

Notwithstanding, the visibility of modern slavery practices in downstream supply chains remains limited. The portfolio relies heavily on data collected from Tier 1 suppliers to analyse modern slavery risk associated with downstream outsourcing.

In 2024–25, the portfolio undertook the following actions to identify and monitor modern slavery risk in its contracts and subcontracts:

- Conducting risk assessments to identify the likelihood and impact of possible modern slavery risks, including sector and industry risk, product and services risk, geographic risk, and operational and entity risk.
- Using the Modern Slavery Risk Screening Tool to differentiate between low, medium, and high-risk categories.
- Including minimum clauses in the contract for provisions for subcontracting consistent with the Supplier Code.
- As improvements in supply chain oversight continues to grow, modern slavery risk assessment processes for subcontracting will evolve and improve.

Response

Training and awareness-raising

In 2024–25, the following activities were undertaken across the Finance portfolio to support training and awareness raising for modern slavery:

- completion of the modern slavery e-Learning modules for central procurement staff
- promotion of the modern slavery e-Learning modules and Modern Slavery Toolkit across DoF and AEC.

In DoF, all officials are also required to complete training in a range of areas including, but not limited to, procurement and contracting, financial obligations, probity, and risk.

To enhance continuous development, DoF also:

- developed a modern slavery strategy to promote engagement with modern slavery across the procurement lifecycle
- delivered a modern slavery workshop aimed at those staff with large value construction contracts to discuss potential issues in downstream supply
- included modern slavery obligations in approach to market documentation as an unweighted evaluation criterion for all high value procurements to assess the extent to which tenderers have put in place processes to prevent or mitigate the risk of modern slavery occurring in their operations or supply chains.

Smaller entities such as the Independent Parliamentary Expenses Authority and Parliamentary Workplace Support Services both undertake minimal procurement activities. As a result, these entities rely solely on training available from the Commonwealth to support their staff.

Commonwealth Procurement and Contract Management Training Suite

In 2024–25, DoF commenced free procurement and contract management training through the Commonwealth Procurement and Contract Management Training Suite. Increasing awareness and understanding of the CPRs and Commonwealth Procurement Framework is vital to ensure compliance when using Commonwealth funds through procurement. The training aims to build sustainable and enduring capabilities across the APS, enhancing the skills of procurers, contract managers, and delegates to ensure value for money and to support the Commonwealth in delivering more strategic value for money outcomes when undertaking the purchase of goods and services.

The benefits include:

- awareness of the specific APS procurement framework, including legal and policy foundations, to ensure participants can navigate and apply the guidelines and regulations governing procurement in the APS context
- enhanced skills in strategic procurement planning within the APS, emphasising the ability to conduct thorough needs assessments, align procurement strategies with organisational objectives, and effectively manage risks
- best practice decision-making within the APS procurement environment, emphasising compliance with APS-specific regulations and ethical considerations
- apply best practice in procurement and contract management.

In addition to a range of procurement and contract management courses, the Suite includes a course on Procurement Connected Policies and on Modern Slavery in Public Procurement.

Procurement and contract management activities

In 2024–25, the Finance portfolio undertook actions to continue promotion and uptake of modern slavery obligations with respect to procurement and contract management, including:

- ensuring all procurements valued at or above \$200,000 GST inclusive include modern slavery questions in the tender and contract documentation
- ensuring all procurement valued at or above \$1 million GST inclusive require suppliers to respond to the Modern Slavery Supplier Questionnaire and submit a Modern Slavery Action Plan with tender submissions
- developing a modern slavery due diligence checklist for staff to use when considering the impact of modern slavery in procurement and contracting
- using the Modern Slavery Toolkit to include relevant modern slavery clauses into all procurements and contracts that were assessed as having a potential for modern slavery risk
- incorporating modern slavery into procurement risk management practices and conducting supply chain risk assessment exercises to identify the likelihood and impact of possible modern slavery risks, including sector and industry risk, product and services risk, geographic risk, and operational and entity risk
- conducting regular contract management reviews and monitoring major contracts to confirm no instances of modern slavery were identified
- identifying and implementing a process for reporting modern slavery issues if/when identified and engaging with the supplier to mitigate the risk as soon as practicable
- completing and recording contract performance reporting at the end of relevant contracts, to support future due diligence and enhance continuous improvement.

When evaluating tenders, officials were reminded to focus on 6 key areas of managing modern slavery risks:

- governance
- stakeholder engagement
- risk identification and prioritisation
- acting on identified risks
- monitoring and evaluating effectiveness in addressing risks
- providing and enabling remedy.

Officials are required to include remediation obligations in all contracts to support a potential modern slavery event.

Supplier activities

In 2024–25, the portfolio undertook actions to engage with suppliers to promote issues relating to modern slavery.

- Suppliers were asked to provide a completed Supplier Questionnaire when responding to any procurement designated as potential for high-risk of modern slavery. The Supplier Questionnaire formed part of the tender evaluation process and was also used to build specific obligations in a subsequent contract.
- Contract managers requested regular updates from suppliers as part of contract reporting obligations and conducted periodic assessments of suppliers (such as desktop reviews or unannounced audits).
- Suppliers were encouraged to have a code of conduct or modern slavery policy that demonstrates commitment to addressing modern slavery risks.
- Contract managers conducted due diligence and monitored performance of suppliers with respect to modern slavery, especially those in higher risk areas. This included:
 - asking suppliers to share internal processes for monitoring and reporting instances of modern slavery
 - ensuring suppliers provided staff with awareness training that supported the early identification and prevention of modern slavery risks.
- Contract agreements used by the portfolio include obligations on suppliers to proactively manage modern slavery risks and associated legal and governance obligations.

Suppliers remain contractually required to report any confirmed modern slavery cases, develop remediation plans and act within the defined contractual timeframe. They must also permit verification of their compliance, including access to premises and records as required.



Selling to Government and Meet the Supplier Events

In 2023–24, DoF, on behalf of the Australian Government, released its updated [Selling to Government website](#) to educate and support suppliers in understanding government procurement and how to better participate in the Commonwealth's economy.

Building on this success, DoF has commenced delivery of supplier workshops that provide businesses with practical steps for developing stronger tender responses and build their understanding of the process for lodging a tender submission, including:

- a brief overview of the CPF
- how Australian Government organisations approach the market
- best practices for responding to an approach to market
- tender writing tips and key elements for a successful response
- common pitfalls and how to avoid them.

Incorporated into these workshops are common supplier obligations with respect to the Modern Slavery Act and alignment with the Australian Government's priority to address modern slavery risks in government supply chains. Suppliers are provided guidance on how to proactively demonstrate compliance, and engagement with, modern slavery obligations and legislation in procurement activities.

In 2024–25, DoF conducted "meet the supplier" events around the country for the Management Advisory and People Panels. These events provide a great opportunity for suppliers to engage directly with officials and share their experiences using the panels.

Response activities

Concerns, complaints and modern slavery remediation

Each entity in the Finance portfolio has an established process to manage complaints raised by individuals or suppliers in relation to procurement and contracting activities, including issues and instances of modern slavery.

Information on how to submit complaints is available in several forms.

Each entity in the Finance portfolio has a complaint page on their public internet for anyone who may wish to make a complaint (of any nature) to the agency. Individuals or suppliers can also contact the DoF for assistance.

Where confirmed instances of modern slavery are identified, the welfare of survivors is foremost in any remediation process.

Each entity in the Finance portfolio has a remediation process established to review, confirm, mitigate or mediate, and resolve instances of modern slavery (if identified), which involves:

- engaging with the complainant to understand and document the concern
- assigning an independent party to review and investigate
- where modern slavery is confirmed, undertaking targeted due diligence and a detailed contract management review and asking the supplier to provide a remediation plan for approval
- working in consultation with the supplier to mediate, mitigate and resolve all confirmed instances of modern slavery and to establish protocols to minimise future risks from eventuating
- where required, the Commonwealth may escalate including, but not limited to:
 - engaging with senior management
 - suspending the contract in question
 - terminating the contract in accordance with termination provisions.

No instances of perceived, potential or actual modern slavery were identified during the reporting period.

Outcomes

As per previous reporting periods, DoF has the following mechanisms to measure the effectiveness of our internal actions to address modern slavery risks:

- staff participating in training provide quantitative and qualitative feedback of improving maturity and understanding
- staff are proactively encouraged to upload their risk assessments to the Financial Management Information System to be reviewed as part of procurement assurance processes
- internal communications are periodically released on relevant connected policies and legislation and traffic to Procurement Assist is reviewed to demonstrate interest and improve engagement
- statistics for the due diligence checklist and modern slavery guidance are reviewed
- random contracts are tested for compliance with obligations to include modern slavery clauses
- contract managers are expected to include modern slavery compliance in quarterly contract management meetings with suppliers.

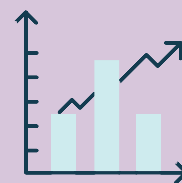
In 2025–26, the DoF will focus on increasing awareness and education across contract management operations and downstream supply chains to find more effective ways to identify modern slavery risk and mitigate those risks with preventative measures.

This may include:

- Carrying out contract management training for officials who have supply chain responsibilities, particularly in high-risk categories.
- Actively collaborating with other Commonwealth entities on modern slavery to inform better practice and a consistent, common approach across government.
- Where possible, proactively engaging with some of our WoAG suppliers to foster a collaborative approach to managing supply chain modern slavery risks for the broader Commonwealth.

The AEC have committed to a review in 2025–26 to uplift internal processes with respect to modern slavery.

Noting they primarily procure via existing panel arrangements, the IPEA and PWSS, as small entities, will continue to rely on Commonwealth guidance.



Foreign Affairs and Trade

The Foreign Affairs and Trade portfolio works to promote and protect Australia's interests overseas in support of our security and prosperity. The portfolio included 4 NCEs:

- **Department of Foreign Affairs and Trade (DFAT)** provides a global diplomatic and influencing capability, leads international strategic policy advice, deepens economic engagement, and delivers international development and humanitarian assistance. DFAT leads whole-of-government efforts to make Australia stronger, safer and more prosperous, to provide timely and responsive consular and passport services, and to ensure Australian Government presence overseas.
- **Australian Centre for International Agricultural Research (ACIAR)** supports Australia's national interest by investing in collaborative public and private research and capacity building partnerships in the Indo-Pacific region to improve the livelihood of smallholder farming, fishing and forestry communities.
- **Australian Secret Intelligence Service (ASIS)** enhances the Australian Government's understanding of the overseas environment affecting Australia's vital interests and take appropriate action, consistent with applicable legislation, to protect identified interests. Due to the nature of its work, this portfolio response does not include specific feedback on the supply chains and operations of ASIS.
- **Australian Trade and Investment Commission (Austrade)** has an overarching purpose to deliver quality trade and investment services to businesses and policy advice to government to grow Australia's prosperity, including leading on national tourism policy. Austrade promotes the opportunities created by deepening economic engagement with key partners, including through trade agreements and the reduction in non-tariff barriers.

The 5 areas of highest contract value within the portfolio in the reporting period, based on United Nations Standard Products and Services Code, were (in order of highest value to lowest value):

- management advisory services
- printed publications
- business administration services
- building construction and support and maintenance and repair services
- temporary personnel services.

Risks

Across the portfolio, the general areas of high modern slavery risk over the 2024–25 financial year were:

- security and related services
- building construction and support and maintenance and repair services
- ICT hardware
- procurements supporting Australia's overseas development assistance (ODA) programs.

The portfolio has identified these areas based on a range of factors, including:

- the nature of the goods or services acquired, with reference to product and industry sector specific risks
- the location from which those goods or services were acquired, with reference to the Global Slavery Index based on geographic risk
- the complexity of supply chains or extent of subcontractors involved, with reference to organisation risks
- alignment with the government's current identified high-risk areas (construction, ICT hardware, cleaning and security services)
- areas of high contract value, noting high spend does not necessarily equate to high risk of modern slavery but may help identify opportunities to influence the market and which area of modern slavery risk to prioritise.

DFAT has multi-tiered and international supply chains. The department engages a variety of domestic and foreign suppliers for goods and services that are often sourced and delivered overseas.

Security and related services

- General areas of high modern slavery risk related to the security sector include security guarding services, airfreight and mailroom services and international civilian armoured vehicle fleet management.
- Labour hire services pose the following direct risks – physical labour, short-term contracts and outsourcing, and the use of foreign or temporary workers (particularly as many of the services are performed overseas in support of DFAT's overseas posts).
- The indirect risks within security service supply chains include organisational risks resulting from poor governance and auditing processes, and geographical risks in regions with inadequate protection for workers.

Building construction and support and maintenance and repair services

- Geographical risks are significant in relation to the construction sector, particularly construction in regions with vulnerable low-skilled or migrant workers (e.g. parts of Asia, the Indo-Pacific and Africa where DFAT has posts). Migrant workers may not be fully aware of or comfortable with enforcing their legal rights.
- High rates of subcontracting create complexities in the supply chain and limit visibility over labour practices.
- Limited visibility over the supply chains of raw materials used in construction projects.

ICT hardware

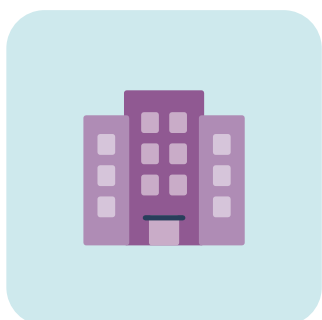
- ICT hardware procurement is a high-risk area for modern slavery due to complex global supply chains and manufacturing processes in regions known for potential labour exploitation.
- Hidden risks arise from deep supply chains of which the prime supplier has little visibility. For example, where ICT hardware includes multiple components sourced from different suppliers across the world.

ODA Programs

- The Australian Aid program has conducted procurements of ICT hardware, cleaning, security and construction – all of which have been identified as high-risk categories.
- Geographical risks also play a significant role, given ODA eligible countries have vulnerable low-skilled or migrant workers who may have little recourse to legal rights, or who may be unaware of or unwilling to enforce their rights.

Austrade

- General areas of high modern slavery risks include security/guarding services, construction projects, cleaning, support and maintenance, utilities and trade shows and exhibits.
- 40 per cent of Austrade procurement activities in 2024–25 were offshore. The offshore procurement activities are at a higher risk of modern slavery due to limited visibility over labour practices.



ACIAR

- Ninety per cent of ACIAR's contract expenditure in 2024–25 was for Research Programs.
- ACIAR considers this category to be of low risk of modern slavery. This is because ACIAR generally enters into contracts with Australian universities, which have enterprise agreements or modern awards to guarantee base standards of employment conditions for staff and researchers.

Procurement teams in portfolio entities have taken the following actions to identify modern slavery risks when undertaking procurements:

- obtained specific advice, support and training from central procurement and legal teams
- referred to the Attorney-General's Department and internal policy and guidance materials with information on how to address modern slavery risks
- completed risk assessments when planning and evaluating medium to high-risk procurements, including by requesting that tenderers or suppliers complete the Supplier Questionnaire to identify modern slavery risks, and set out how the supplier will mitigate those risks
- included modern slavery tender and contract clauses in procurement and contract documentation, including obligations on suppliers to provide information about their subcontractors and supply chains, report modern slavery risks, and flow down requirements to subcontractors.



DFAT

- DFAT used the Modern Slavery Toolkit to identify high-risk procurements. In these procurements, DFAT used the model modern slavery tender and contract clauses.
- DFAT considered modern slavery as part of its evaluation processes. For example, in high-value ICT procurements, DFAT included modern slavery compliance into the evaluation criteria.
- DFAT also had regard to modern slavery registers for suppliers registered in Australia and the United Kingdom, noting these are currently the only countries with laws requiring entities to publicly report on their efforts to address modern slavery within their operations and supply chains.
- DFAT requires suppliers to actively manage their modern slavery risks. DFAT's prime building management supplier conducted structured due diligence on subcontractors and suppliers before onboarding and during contract renewals. All major subcontractors were required to complete a Supplier Questionnaire detailing their labour practices, supply chain visibility and any existing anti-slavery measures. DFAT considered workers in the supply chain and what practices the supplier would put in place to avoid forced labour or exploitation.
- DFAT prioritises use of the WoAG panel arrangements, including the People Panel and the Hardware Marketplace. These arrangements include requirements on suppliers to identify, assess and address modern slavery risks.

Austrade

- Austrade required officials to use a procurement planning checklist that includes a section on early identification of potential modern slavery risks. When modern slavery risks were identified, officials sought advice from Procurement and Legal teams.
 - Austrade incorporated identified modern slavery risk areas and proposed treatments in its 18-month strategic procurement planning framework.

ACIAR

- In early 2025, ACIAR restructured its procurement model to deliver a centralised procurement function. This has enabled ACIAR's central Procurement and Contract Management team to have oversight of all arrangements and determine if any raise medium or high risks of modern slavery. During this reporting period, no arrangements have raised medium or high risks.

Response

Training and awareness-raising

The Foreign Affairs and Trade portfolio focussed on building awareness of modern slavery risks through:

- online and in-person training
- online internal agency and Australian Government guidance material
- DFAT led procurement community of practice meetings
- targeted communication activities, including Attorney-General's Department led committees, workshops and events on modern slavery.

In 2024–25, DFAT's central procurement team conducted full day in-person workshops on procurement and contract management, which included training on addressing modern slavery in public procurement.

Staff who conducted ICT, construction related, and ODA procurements were required to complete modern slavery e-Learning modules to assist them understand how to identify and manage modern slavery risks. DFAT encouraged all other staff conducting procurements to complete modern slavery e-Learning modules. The modern slavery e-Learning modules were developed by the Australian Government and hosted on DFAT's e-Learning platform.

DFAT raised awareness of modern slavery risks and mitigations through internal communications, including specific intranet announcements and presentations in its procurement community of practice. The community of practice has over 140 members.

ACIAR actively expanded access to tools and guidance for staff in 2024–25 by:

- delivering bespoke procurement and contract management training to staff that included content relating to identifying and assessing the risk of modern slavery
- maintaining active membership of the IDCP, to keep staff informed of better practice and emerging trends
- publishing the Modern Slavery Toolkit, including the Supplier Questionnaire, on the Central Procurement intranet page for visibility and use by the central procurement team when undertaking and reviewing procurement activities
- requiring all staff in the Central Procurement Team to complete the modern slavery e-Learning modules.

Procurement and contract management

Improvements have been made to procurement and contract management processes by:

- enhancing policy requirements for officials to consider modern slavery risks and use modern slavery clauses in approach to market and contract documentation
- placing a stronger emphasis on procurement teams seeking specialist advice from legal and procurement teams where potential modern slavery risks are identified
- implementing more proactive engagement with suppliers in relation to reducing modern slavery risks.

DFAT required suppliers to prepare and submit a Modern Slavery Risk Management Plan for medium and high-risk procurements.

Areas within the department responsible for ICT and security related procurements reviewed the public modern slavery statements of suppliers with large annual consolidated revenue to inform tender evaluation.

Contract drafting and negotiations for strategic, high-value procurements were led by an externally engaged legal representative, with decisions and outcomes further reviewed by DFAT's Commercial Law Section. This has strengthened compliance with modern slavery requirements.

All contract templates (including the CCS) incorporate modern slavery clauses and drafting guidance on appropriate use of the clauses based on the assessed modern slavery risk level. These requirements also flow down the supply chain. The CCS and DFAT's complex contract templates also include requirements for suppliers to seek DFAT approval of proposed subcontractors, which improves DFAT's visibility and influence over supply chains.

Austrade reviewed and updated its procurement policy, templates and processes for offshore procurements to incorporate modern slavery clauses. Austrade also developed a Procurement Planning Checklist, which is required for all proposed procurements over \$10,000 GST inclusive. This checklist includes reference to modern slavery considerations.

In February 2025, ACIAR moved to a centralised procurement model which means that a centralised team is involved in all procurements. This central team is required to undertake the modern slavery e-Learning training modules to identify, assess and manage modern slavery risks.

The ACIAR suite of procurement and contracting templates used for Research Program activities incorporate the model modern slavery tender and contract clauses. For non-Research Program

procurements, ACIAR uses best efforts to use the CCS, or WoAG panel arrangements that include modern slavery tender and contract clauses.

Supplier activities

Portfolio entities have encouraged engagement with suppliers on modern slavery requirements by including modern slavery considerations in procurement documentation. For example, entities have sought additional details on supply chains and modern slavery risk mitigations by using the Supplier Questionnaire for strategic, high-value procurements or when modern slavery risks are assessed as medium to high. DFAT also required suppliers to prepare and submit a Modern Slavery Risk Management Plan for medium and high-risk procurements to clearly set expectations and ensure modern slavery issues are addressed in contract delivery.

The portfolio has encouraged officials to monitor modern slavery practices as part of contract management activities. For example, DFAT's overseas property office has adopted a collaborative approach to discussing modern slavery risk management practices with suppliers, and incentivising improvements through key performance indicators.

The portfolio has also facilitated engagement with suppliers outside of specific procurement processes to raise awareness of modern slavery risks and mitigations. For example, DFAT officials who manage ODA programs held several bid writing seminars for suppliers, which included guidance on modern slavery requirements.

Response activities

Portfolio entities had procurement complaint mechanisms in place to allow affected stakeholders to raise concerns or complaints about procurements, including concerns relating to modern slavery.

All contracts with modern slavery contract clauses require suppliers to inform the Commonwealth of modern slavery issues and allegations in their operations.

Portfolio entities had processes in place to address concerns. A typical process involves:

- officials investigating the reported modern slavery incident internally, and engaging with senior representatives of the supplier if required, focusing on resolving the issue and safeguarding affected individuals
- the Commonwealth requiring the supplier to develop a remediation plan to resolve the issue and protect impacted individuals
- engagement with external stakeholders when necessary, including the AFP and Attorney-General's Department.

Outcomes

The portfolio has made good progress on forward looking actions previously reported. This has included continued training and awareness raising activities, incorporation of modern slavery clauses in approach to market and contract documentation, deployment of modern slavery risk assessment tools, and greater engagement with suppliers to address modern slavery risks.

- There has been an increase in modern slavery training and awareness-raising activities undertaken by DFAT, including increased completion of the modern slavery e-Learning modules and the inclusion of modern slavery risk considerations in supplier bid writing seminars held by the department.
- As set out in DFAT's 2023–24 forward plan, the area responsible for security related procurements incorporated the Supplier Questionnaire compliance check into annual contract management group meetings during the reporting period.
- As set out in DFAT's 2023–24 forward plan, the area responsible for ICT procurement:
 - held discussions with major suppliers on modern slavery. This business area has reflected the outcome of these discussions in contract management governance practices, however, did not finalise development of a vendor management framework during the reporting period
 - engaged with DTA in relation to the Digital Marketplace 2.0 head deed, including in relation to modern slavery requirements.
- DFAT conducted the Passport Contact Centre Service procurement and Design and Production of the Australian Travel Document procurement in 2024–25. As reported in last year's statement, DFAT conducted modern slavery risk assessments for these procurements and confirmed that suppliers had self-reported supply chains in their modern slavery statements.
- Austrade has engaged in additional planning and improved integration of modern slavery clauses and risk assessments into procurement processes.
- ACIAR has embedded modern slavery clauses into procurement processes and worked to confirm large suppliers have lodged modern slavery statements on the register.

Measuring effectiveness

Entities within the portfolio have taken steps to assess the effectiveness of their actions to address modern slavery risks, including:

- receiving feedback from suppliers and staff on how modern slavery measures are working in practice, to inform adjustments in the future
- monitoring the number of staff who have completed modern slavery training (and observing increases each financial year). For example, records indicate the following number of DFAT personnel have completed the modern slavery e-Learning modules:
 - 2022–23 financial year: 15
 - 2023–24 financial year: 33
 - 2024–25 financial year: 70
- encouraging staff to provide feedback on modern slavery training
- monitoring the frequency of information sharing internally and across the portfolio
- monitoring the number of suppliers providing responses to the Supplier Questionnaire as part of tender processes. Entities have noticed an increase in supplier engagement as a result of including modern slavery clauses in templates.

Looking forward

Going forward, the portfolio will seek to increase monitoring of the effectiveness of actions to address modern slavery risks.

In December 2024, DFAT commenced second line assurance activities of procurements and contract management practices to observe the extent to which officials are complying with procurement policies, including modern slavery requirements. DFAT will continue these second line assurance activities in the next reporting year. DFAT will monitor staff engagement with internal communications about modern slavery.



DFAT will develop a survey that can be shared with officials across the portfolio to assess the awareness of modern slavery risks and effectiveness of portfolio actions to address these. Within the portfolio, planned actions include:

- enhancing policy and guidance materials to better embed modern slavery considerations in procurement and contract management practices
- raising awareness of modern slavery across the portfolio by increasing the number of staff who undertake modern slavery training
- continuing to engage with Australian Government initiatives to combat modern slavery, including improved understanding of supply chain risk data that can inform decision-making and risk management
- implementing guidance and tools, such as revised model modern slavery tender and contract clauses or new screening tools
- where possible, collaborating with other agencies to share experiences, discuss internal awareness campaigns, and exchange internal guidance materials.

In addition to these actions, DFAT plans to:

- develop a factsheet on modern slavery requirements and share it with its overseas posts and portfolio entities
- conduct second line assurance of procurements and contract management practices to observe the extent to which officials are complying with procurement policies, including modern slavery requirements
- develop a supplier management framework for ICT procurements, which will include guidance on addressing modern slavery risks and requirements
- organise supplier management forums with key ICT suppliers
- advertise the modern slavery e-Learning modules on its intranet and, if possible, including links to these modules on DFAT's e-Learning platform so that DFAT can monitor completion rates.

The ACIAR central procurement team plans to:

- document and implement standard operating procedures for the review of supplier modern slavery statements for its major suppliers
- embed the consistent use of the Supplier Questionnaire into its procurement processes where the risk is assessed as medium to high.

Case study

DFAT Overseas Construction Procurement

On a construction project in India, DFAT identified potential modern slavery risks related to migrant labour. To manage those risks, DFAT included modern slavery clauses in its contractual arrangements with the construction supplier including flow down obligations for subcontractors. Under these clauses, DFAT required the supplier to submit for review and approval a Modern Slavery Risk Management Plan (Plan), which set out how the supplier would manage its supply chain.

In addition, DFAT introduced oversight measures, for example monitoring the welfare of the workers onsite.

As a result of these contract management practices, the supplier managed the construction site in accordance with the approved Plan, and no instances of worker exploitation were observed.

This is an example of an effective and proactive approach to modern slavery risk management, which worked to safeguard ethical labour practices and worker welfare.

Health and Aged Care

The Department of Health and Aged Care, and its broader portfolio of agencies, deliver a wide range of health services and health outcomes to the Australian population through diverse and interconnected programs and projects. During the reporting period, the portfolio consisted of the following NCEs:

- Department of Health and Aged Care
- Aged Care Quality and Safety Commission (ACQSC)
- Australian National Preventive Health Agency (ANPHA)
- Australian Radiation Protection and Nuclear Safety Agency (ARPANSA)
- Cancer Australia (CA)
- National Blood Authority (NBA)
- National Health and Medical Research Council (NHMRC)
- National Health Funding Body (NHFB)
- National Mental Health Commission (NMHC)
- Organ and Tissue Authority (OTA)
- Office of Inspector-General of Aged Care
- Professional Services Review (PSR)
- Sport Integrity Australia (SIA).

The 5 areas of highest contract value in the portfolio during the reporting period were:

- components for information technology or broadcasting or telecommunications
- computer equipment and accessories
- building construction and support and maintenance and repair services
- hardware
- non-residential building construction services.

In delivering these health outcomes there are inherent risks, including modern slavery in new and existing procurement supply chains.



Key identified areas of modern slavery risk across the portfolio, that have been previously reported, remain.

- Building and Construction – The construction sector worldwide relies heavily on a substantial workforce of low-skilled labour, frequently operating under challenging and inadequately regulated conditions. During the 2024–25 financial year, the Health and Aged Care Portfolio initiated and completed several significant refurbishment projects within its leased facilities across Australia.
- Personal Protective Equipment (PPE) – Following the announcement of the COVID-19 pandemic in 2020, the global supply chains for PPE and other medical equipment and consumables were put under pressures not seen in recent history. Modern globalisation has funnelled the majority of associated manufacturing offshore where workers may face higher risks of modern slavery, and this often occurs in locations with minimal regulation and oversight of general working conditions
- ICT Hardware – Many components of ICT hardware are produced in regions of the world where human rights concerns have been identified. The primary products acquired include laptops, servers, and network equipment, as well as personal devices such as tablets, mobile phones, headsets, and similar items.

Other general areas of high modern slavery risk identified in the portfolio are:

- health and medical equipment in addition to PPE and a range of other health equipment and consumables.
- imported blood products
- aged care service
- guarding services.

Assessments across the portfolio agencies indicate a consistently low risk of modern slavery, as procurements predominantly focus on research activities and ICT services sourced domestically through established Commonwealth panels and mandatory contract templates, with no high-risk areas identified. Where potential risks exist, such as with ICT hardware, reliance is placed on provider obligations under panel arrangements and robust due diligence processes.

While a small percentage of contracts (notably in cleaning, security, and ICT hardware) are identified with higher potential risk, these are mitigated by procurement methods, legislative compliance, and the use of reputable suppliers. Portfolio agencies maintain strong visibility and governance over their supply chains, generally operate within low-risk environments, and rely on stringent panel requirements and thorough evaluations to further reduce exposure to modern slavery risks.

Response

Training and awareness-raising

Portfolio staff involved in high-risk procurement activities have access to resources such as e-Learning modules and are encouraged to undertake training developed by DoF and the APSC. Key procurement staff participate in government forums and practice communities to strengthen understanding of modern slavery risks.

Training initiatives over 2024–25 included foundational programs for new staff, regular use of procurement guidance and risk assessment procedures—covering modern slavery considerations for procurements above \$10,000 GST inclusive—and ongoing support from a central procurement team. It was noted that while some Agencies did not conduct modern slavery specific training during 2024–25 due to a low assessed risk, they still actively promoted relevant e-Learning resources and provided guidance materials through their intranet.

ARPNSA has centralised finance and legal functions, maintains a compliance training calendar tailored to staff roles and addresses modern slavery in internal training and high-value project reviews. Modern slavery risks in supply chains are further emphasised through participation in sector-wide events, such as the DTA's session on 11 February 2025.

Many agencies effectively manage modern slavery risks by leveraging whole-of-government procurement processes and established panel providers. These arrangements incorporate standard clauses and ensure alignment with the CPRs and CCS, promoting consistency and compliance across procurement activities.

Procurement and contract management

Portfolio agencies are actively managing modern slavery risks in procurement by leveraging whole-of-government processes, engaging panel providers that have been pre-assessed for Commonwealth suitability, and consistently incorporating standard modern slavery clauses in high-value contracts.

Many agencies go beyond minimum requirements by conducting formal risk assessments for contracts above \$10,000 GST inclusive and involving governance, risk, and legal teams when elevated risks are identified. All agencies adhere to the CPRs and frequently use the CCS and standard clauses to ensure consistency and compliance.

Ongoing improvements to policies, templates, and awareness-raising initiatives throughout 2024–25 reflect a strong commitment to enhancing modern slavery risk management. Centralised support from finance, legal, and procurement teams, along

with collaboration through shared services with external procurement branches, further strengthens procurement and contract management practices.

For high-value contracts (typically \$10,000 GST inclusive and above), formal risk assessments are mandatory. For smaller or low-value procurements, agencies draw on the expertise of central procurement teams, staff training, and professional judgment to address modern slavery considerations. This flexible approach ensures that risks are still thoughtfully managed, even where formal measures may not be required.

Central procurement and legal teams are actively reviewing and updating templates and policies to strengthen awareness and responsiveness to modern slavery risks. These enhancements reflect a commitment to continuous improvement, with further refinements planned into 2025–26.

Agencies are increasingly identifying and addressing specific modern slavery risks. When such risks are recognised, appropriate contractual clauses and tailored guidance are provided to support effective mitigation. Collaboration with shared services and departments such as Health, Disability, and Ageing further reinforces strong procurement and contract management practices. These partnerships ensure that modern slavery risk assessments and policy enhancements remain embedded in procurement planning and execution.

Even in cases where identified risks are low, agencies remain committed to continuous policy development and the integration of modern slavery considerations into procurement planning and execution.

During 2024–25, the portfolio has been actively addressing modern slavery risks in our procurement activities. Consultation was undertaken across the portfolio to understand specific spend profiles and identify areas of risk.

Portfolio agencies have access to the department's Strategic Procurement Branch (SPB) through the Shared Services model. This arrangement provides portfolio agencies with support and collaboration in undertaking procurement and contract management activities.

During 2024–25, to enhance transparency and risk mitigation, procurement templates for RFT, Evaluation, and Contracts were reviewed by SPB, and updated where necessary to ensure they align with the current model clauses that addresses modern slavery risk.

The following actions were also undertaken across the portfolio:

NBA

- NBA manages contracts with commercial suppliers, including those for imported blood products. Contract management materials include modern slavery clauses in approach-to-market and contract templates have been implemented. Additionally, staff training and guidance materials will also cover modern slavery awareness and obligations.
- A suite of blood and blood-related contracts was recently updated by the NBA to incorporate Commonwealth modern slavery clauses, and future tenders for blood products and other goods will assess responses against these requirements.

NMHC

- NMHC staff are required to use agency templates, or the CCS of templates when not procuring from a panel. Training is encouraged to be undertaken on procurement and contract management training, which include components on modern slavery.
- NMHC procurement and legal teams review contracts before signing for all high and medium risk procurements, as well as upon request, and procurement materials have been updated to include modern slavery clauses in both approach to market and contract templates, with further coverage in guidance and staff training.



The department finalised evaluations for the RFT to establish a supply panel for PPE. The resulting Standing Offer (SON4061286) includes terms and conditions to identify and mitigate modern slavery risk across supply chains, accountability for suppliers to maintain policies/ plans to address modern slavery, establishing grievance mechanisms and implement accountabilities across managing operations and supply chains.

ACQSC

- All cash and investments are held securely with the Reserve Bank of Australia or major Australian banks, and all cleaning staff have baseline security clearance. As a small entity with limited procurement spend, the organisation has not undertaken further risk assessments beyond those commensurate with its size and scope, but in 2024–25, ACQSC continued implementing a structured, risk-based approach to identifying and mitigating modern slavery risks in procurement activities.
- All staff were required to document procurement risk assessments as part of ACQSC processes. These assessments include consideration of modern slavery and other human rights risks, with the level of analysis proportionate to the procurement's scale, scope, and overall risk profile. This helps ensure financial delegates have visibility of modern slavery risks when making decisions.
- In alignment with the broader Australian Government approach, the ACQSC prioritised attention on areas with higher modern slavery risks within operations and supply chains. Where relevant, additional scrutiny was applied during planning and sourcing stages.
- Across both panel arrangements and other procurements using the CCS, mandatory clauses included within these established mechanisms to help ensure suppliers, their personnel, and subcontractors were legally obligated to comply with Australian laws, including those relating to modern slavery.
- A small number of ACQSC procurements (approximately 1%) related to services that do not typically fall under standard terms and conditions. These were reviewed and classified as low risk for modern slavery due to the nature of the of the goods and services involved. These are generally managed through standard supplier account arrangements, rather than formal government contracts.
- Through this framework, ACQSC has maintained strong governance and accountability in its procurement processes while systematically minimising exposure to modern slavery risk in its contracts and supply chains.

These approaches outlined above demonstrate the Portfolio's commitment to ethical procurement practices and our dedication to combatting modern slavery.

Supplier activities

Throughout the 2024–25 financial year, agencies updated procurement and contract management materials to include modern slavery clauses and related staff training, amended blood-related contracts to align with Commonwealth modern slavery requirements, and ensured new contracts incorporated these standards, while legacy agreements were required to comply with existing laws.

Recent policy updates mandated ongoing contract monitoring, risk assessment, and assurance consistent with Commonwealth guidance. Some agencies engaged in the IDCP and tailored supplier engagement to the scale of their procurement, while others, such as those relying on panel arrangements managed by other entities, did not engage directly with suppliers or found no high-risk suppliers requiring further action.

All suppliers became subject to the Supplier Code from 1 July 2024. PSR wrote to suppliers late in 2024 reminding them of obligations under the new supplier code of conduct, which includes the Commonwealth's commitment to address modern slavery risks in its supply chains.

Additionally, the department's PPE Panel introduced provisions for ongoing updates and required participating suppliers to maintain Modern Slavery Risk Management Plans, including supply chain monitoring, staff training, and grievance mechanisms, with insights expected to inform broader procurement across the portfolio.

Response activities

Suppliers can lodge procurement complaints in writing to the central procurement teams of the relevant agency, where complaints are handled according to a formal policy. Upon receipt, agencies must promptly assess and investigate the complaint, appointing an independent officer and seeking probity and legal advice as needed. The process ensures that suppliers are not discriminated against for raising concerns, and complaints are addressed within set timeframes, with outcomes communicated in writing. If the complaint falls under the *Government Procurement (Judicial Review) Act 2018*, the procurement process may be suspended until the issue is resolved or a Public Interest Certificate is issued.

Outcomes

Measuring effectiveness

Throughout the reporting period, most portfolio agencies did not identify any potential or actual instances of modern slavery within its operations or supply chains, assessing its preventative actions and adherence to legislative and governance frameworks as effective despite the absence of a formalised assessment process or detailed effectiveness reviews.

The smaller portfolio agencies, with limited contracts, applied procurement risk assessments for all procurements valued at \$10,000 GST inclusive and above, incorporated relevant contract clauses, and relied on established Commonwealth panels where modern slavery considerations had already been evaluated.

Although the effectiveness of these measures has not been formally measured beyond consistent application, no issues or breaches were reported. A number of portfolio agencies plan to enhance staff awareness through targeted training and to leverage shared procurement services as it matures, whilst continuing to monitor effectiveness through post-implementation reviews focused on identified instances of modern slavery.

Looking forward

Portfolio agencies are taking a proactive, risk-based approach to managing modern slavery risks in procurement by updating policies, enhancing staff awareness and training, implementing a new Governance, Risks and Compliance system to embed risk mitigation, and utilising Department of Health, Disability and Ageing shared services for advice as required.

They plan to review and align internal documentation and record-keeping with updated Commonwealth frameworks, promote awareness through updated guidance, and incorporate modern slavery clauses in contracts where appropriate.

Although modern slavery risk is most commonly assessed as low, portfolio agencies have identified further actions, ongoing procurement and contract management training, and continuous process improvements, which aim to ensure compliance, monitoring and mitigation of potential risks.

Home Affairs

The Home Affairs portfolio is responsible for delivering a wide range of services to the Australian people, including emergency management, national security, cyber and critical infrastructure resilience and security, immigration, border security and management, counter-terrorism, and citizenship and social cohesion.

During the reporting period, the portfolio included the Department of Home Affairs (including the Australian Border Force) and the National Emergency Management Agency (NEMA).

NEMA leads and coordinates Australia's federal response to emergencies and natural disasters. Its primary functions include disaster preparedness, relief and recovery efforts, risk reduction, and resilience-building initiatives. NEMA works in partnership with state and territory governments, communities, and stakeholders to ensure effective national emergency management and support.

The 5 areas of highest contract value for the portfolio were:

- maritime surveillance
- management advisory
- property
- computer services
- migrant services.

Risk

Department of Home Affairs

The department, through its procurement and contracting activities, has identified a number of high-risk areas of modern slavery. These areas include textiles, ICT, construction, security, refugee programs and recruitment (for permanent, temporary and contractor staff).

To identify these risks, the department considers each procurement activity on its merits and the outcome of the assessment conducted by the business area using the Modern Slavery Toolkit. The Modern Slavery Toolkit is also used to assist procurement officers to identify, assess and manage modern slavery risks at all stages of the procurement process. Consideration is given, but not limited, to sector and industry risk, product and services risk, geographical risk, supply chain model risk, and organisational risk.

NEMA

During the 2024–25 financial year, NEMA undertook a review of the current procurement activities being undertaken and identified areas with elevated modern slavery risk. This considered factors such as contract category, available supplier information, sector, supply chain complexity, and workforce vulnerability.

Areas of elevated risk were primarily associated with procurements involving offshore manufacturing, subcontracted labour, or limited supply chain visibility – such as apparel, facilities services, and logistics support.

The assessment was informed by internal procurement reviews, supplier information (where available), and external guidance including the Global Slavery Index and the Australian Government's Modern Slavery Risk Screening Tool.

Actions undertaken to identify risk include:

- Modern slavery is identified as part of the Procurement Plan and incorporated as part of the procurement process, including the risk assessment undertaken throughout the procurement life cycle.
- Requesting completion of the Supplier Questionnaire where the procurement has been assessed as having a high modern slavery risk of 9 or more when applying the Modern Slavery Risk Screening Tool.
- The Procurement and Contracts Support Branch provide advice and support related to Procurement Connected Policies, including supporting Procurement Officers in establishing and managing modern slavery risk. All procurement activities undergo a process to establish if modern slavery risk applies and if applicable, strategies to mitigate risk.

NEMA has undertaken reviews to identify potential modern slavery risks in its procurements by the contract category, considering available supplier information, and referencing external sources such as the Australian Government risk mapping tools. The NEMA Corporate Procurement team have embedded the requirement for risk assessments to be conducted prior to entering into a procurement arrangement, with business areas to consider modern slavery risks during the sourcing process to ensure informed and ethical decision-making is maintained. Contract managers are also encouraged to revisit and update (where appropriate) these risk assessments throughout the contract term.

Response

Training and awareness-raising

Department of Home Affairs

The modern slavery e-Learning modules are included in the department's procurement and contract management Learning Opportunities Matrix. Completion of the modules is an essential requirement for experienced procurement practitioners and central procurement areas in the department.

The department's Procurement and Contract Management Snack and Study professional development initiative provides the opportunity for staff across the department to complete the e-Learning modules to enhance their understanding of modern slavery risk in public procurement.

The department has an extensive Procurement and Contract Management Outreach Program. Procurement Account Managers from the Procurement and Contracts Support Branch provide all Contract Managers and procuring officers information on contracts, procurement updates, changes to policies, training opportunities and reminders on contract management requirements, such as modern slavery.

Procurement and Contracts Support Branch has a Procurement Enquiry System where staff can submit an enquiry and procurement officers provide procurement and contract management advice and guidance.

Procurement and Contracts Support Branch has many learning and development opportunities available for staff who wish to enhance their procurement and contract management skills and knowledge. This includes a Procurement and Contract Management Drop-in Clinic, which is a one-on-one session where staff can choose the procurement or contract management topic they would like to discuss.

The department further promotes awareness of modern slavery risk through internal communication channels including intranet notices, a financial newsletter and the department's Procurement and Contract Management Professionalisation intranet hub.

The Australian Border Force (ABF) College has also commenced assigning the AFP's Human trafficking: Look a Little Deeper program to ABF frontline officers to better equip them with the ability to identify and refer potential victims of human trafficking and modern slavery to the AFP for investigation.

NEMA

NEMA actively promoted awareness of modern slavery risk through targeted internal communications, team discussions, and correspondence embedded in procurement and contract planning activities. The Corporate Procurement team worked to ensure they were aware of any legislative changes and industry best practice, to ensure risk mitigation strategies were integrated into high-risk engagements. Additionally, procurement staff participated in the Commonwealth wide Finance Procurement and Contract Management Community of Practice, where modern slavery policies and resources are provided and discussed.

The department provides suppliers with information on modern slavery, including guidance, training and resources via the Modern Slavery Toolkit.

NEMA recognises training on modern slavery risk as a priority and is exploring options to introduce formal training for relevant staff in the near future.

NEMA is also committed to enhancing supplier engagement by sharing educational materials and promoting practical tools to support supplier compliance moving forward.

Procurement and contract management

Department of Home Affairs

The department has strengthened our Contract Management Policy, Contract Management Manual (CMM) and Contractor and Consultant Management Framework. The CMM includes comprehensive guidance on monitoring and managing modern slavery risks in the contractor's supply chain, including reporting obligations, during the contract life cycle. The department's contract management template also includes guidance on monitoring and managing modern slavery risks.

Throughout the procurement lifecycle, the department ensures all relevant information regarding modern slavery is available to delegates, procuring officers and contract managers. This includes policies, templates, guidance and information on considerations of the potential impacts modern slavery may have on procurements and in contract management.

Risk is an ongoing consideration throughout the procurement lifecycle. Procuring officers and contract managers consider, assess, monitor and mitigate risks throughout the procurement planning, approach, evaluation and contract phases, including any modern slavery risks that may be associated with their procurement.

An example of this is the department's Procurement Plan template and Tender Response template, which include a provision to consider modern slavery risk. The Tender Response template also includes a prompt for tenderers to confirm whether they are a reporting entity under the Modern Slavery Act.

The department's Contract Management Plan makes reference to the Australian Government's commitment to addressing modern slavery and the requirement for contract managers to monitor modern slavery supplier reporting obligations. These requirements are included in relevant contracts.

Procurement and Contract Management Library of tools, templates and guidance includes links to the Modern Slavery in Australia website, Modern Slavery Toolkit, Modern Slavery Tender clauses and guidance, modern slavery model contract clauses, Modern Slavery supplier questionnaire and the modern slavery e-Learning modules.

NEMA

NEMA has updated procurement templates and guidance throughout the 2024–25 financial year to ensure compliance with the CPRs, legislation and to ensure NEMA is assessing modern slavery risks throughout the lifecycle of relevant procurements.

In 2024–25, risk assessments were specifically undertaken for new high-risk procurements, including those involving offshore manufacturing, uniforms, and facilities services. Modern slavery clauses were consistently included in tender documents and contract terms for applicable categories.

Additionally, modern slavery considerations were embedded in procurement panel templates, with internal procurement processes regularly reviewed and updated to align with legislative and reporting requirements.

All procurements use the approved modern slavery tender clauses, and modern slavery contract clauses either under the Government procurement panel arrangements or the CCS.

Supplier activities

Department of Home Affairs

The department uses the contract as the mechanism to manage any issues with the supplier. This includes using the dispute resolution and remediation action plans. The department engages with suppliers and seeks supplier input through the completion of the Supplier Questionnaire. Contract managers work with suppliers to assess and if required, mitigate modern slavery risks.

Contract managers are encouraged to have regular discussions with suppliers when managing their contracts. The department's Contract Management Plan, required for all strategic procurements, has several tools and instructions to assist contract managers manage modern slavery risks. It also provides guidance on stakeholder relationships, including the use of a stakeholder engagement plan.

Contract managers can approach the Procurement and Contracts Support Branch in the department for advice, guidance and support if there are any contractual issues, including any concerns or issues regarding modern slavery.

NEMA

NEMA engaged with suppliers and sought supplier input via completion of the Supplier Questionnaire. Supplier responses included the provision of modern slavery training to staff, and an overall reflection of the growing awareness of modern slavery risk. NEMA reinforced its ethical sourcing expectations with suppliers in procurement documentation and the Supplier Code. Contract managers work with suppliers to assess and if required, mitigate modern slavery risks.

NEMA provide suppliers questionnaires on how they address modern slavery risk particularly where products are sourced overseas.

Response activities

Department of Home Affairs

A procurement complaint is an expression of dissatisfaction or objection to something that the department has done, proposes to do, or has not done, in managing a procurement process, where a response or resolution is explicitly or implicitly expected. The department has processes in place that allows affected stakeholders to raise procurement complaints or concerns. This is available on the department's website.

Any official who receives a procurement related complaint must immediately forward that complaint to the Receiving Officer at the relevant email address. The receiving officer will consider the complaint and develop remediation strategies as applicable.

The department also has processes in place to address and resolve concerns about modern slavery and workplace issues.

NEMA

While NEMA does not have a formal grievance mechanism and remediation pathway in place, there are existing whistle-blower and complaints procedures in place to assess modern slavery concerns.

Internal Procurement templates and processes are continuously reviewed and updated to reflect reporting requirements.

Outcomes

Measuring effectiveness

Department of Home Affairs

- The department has an increased focus on planning for procurements including modern slavery at the planning stage.
- Modern slavery training has been promoted through internal communications and the Procurement Outreach Program.
- Ensuring modern slavery clauses are included in RFTs.
- Increasing engagement with suppliers on modern slavery.
- Contract managers are able to approach Procurement and Contracts Support Branch in the department for advice, guidance and support if there are any contractual issues. This includes any concerns or issues regarding modern slavery.
- Increased focus on due diligence. For example, as part of the evaluation process, evaluation teams are responsible for conducting commercial and financial viability checks. This could include, but is not limited to, checking:
 - a potential supplier's exposure to risk, including factors such as the industry and supply chain complexity
 - background checks to identify dishonest, unethical or unsafe supplier practices, including modern slavery practices.

The department includes risk mitigation strategies to address modern slavery in all procurement planning. This includes training available to staff on modern slavery, understanding risks associated with industries considered to be at high risk of modern slavery, inclusion in contracts clauses to assist in combating modern slavery, as well as engagement with suppliers to understand modern slavery and where supply chains could include modern slavery.

NEMA

In 2024–25, NEMA continued to address modern slavery risks by monitoring key indicators, including the frequency of supplier engagement and the proportion of contracts containing modern slavery clauses compared to previous reporting periods, supported by completed Supplier Questionnaires. This provided a baseline to track improvement in risk awareness and contract clause inclusions.

Looking ahead, NEMA will continue its current practice and review internal compliance checks, along with gathering targeted feedback from suppliers, where applicable. These measures will support a more systematic assessment of how well modern slavery risks are being identified and managed across NEMA procurement activities.

Looking forward

Department of Home Affairs

The department will continue to:

- Encourage and educate staff on modern slavery considerations.
- Consider modern slavery when planning for procurement activity.
- Undertake due diligence throughout the lifetime of the contract so that any issues or concerns regarding modern slavery may be identified at any stage.

A due diligence checklist is being developed to assist the department with the checks and analysis that should be considered when undertaking a procurement and engaging suppliers, including what checks to undertake in respect of modern slavery risk, based on domestic and international standards. The procurement and contract management assurance work will include reviews of the due diligence processes and effectiveness of the checklist.

NEMA

NEMA will continue to update internal procurement templates and procedures to ensure modern slavery tender and contract clauses are included, where necessary. In addition, the NEMA Corporate Procurement team will attend and encourage other staff to participate in portfolio training, Community of Practice forums, and the IDCP.



Industry, Science and Resources

The Industry, Science and Resources portfolio includes 3 NCEs, the Department of Industry, Science and Resources (DISR), Geoscience Australia and IP Australia.

Operations within the portfolio include supply chain matters in relation to manufacturing and industry sectors. DISR has a division dedicated to sovereign capabilities and supply chain resilience, which identifies vulnerabilities in supply chains critical to Australia's national interests.

Procurement activity is de-centralised within each portfolio entity, and each entity has a centralised procurement advisory team.

The portfolio procures goods and services from various sources including Australian entities and via WoAG arrangements. Goods and services are typically provided directly by the supplier.

For contracts reported to AusTender during the reporting period, the 5 categories of highest contract value for the portfolio were:

- temporary personnel services
- earth science services
- environmental safety services
- marine transport
- management advisory services.



Risks

While the highest volume procurement categories across the portfolio are not generally at high-risk of modern slavery, procurement of technology, construction, security and cleaning services do fall into the high-risk category. Most of these procurements are via WoAG arrangements, which have considered modern slavery risks as part of establishment.

Across the portfolio, procurement officers consider risk during the procurement process. Where risk assessments are completed, modern slavery risks are included in these assessments, particularly for those high-risk categories. Central procurement teams are available to provide advice and review high-risk procurements. Modern slavery clauses are included in contracts to ensure suppliers are aware of their obligations and comply with ethical standards.

DISR has a central procurement team who provide support and guidance, calling out specific industries and categories most at risk. The central procurement team monitors high-risk procurements and ensures adherence to the Modern Slavery Toolkit, where necessary. Procuring officers check the validity of suppliers in terms of modern slavery protocols as part of their value for money assessments, including undertaking a search of the Modern Slavery Statements Register, where appropriate (e.g. for ICT procurements which are a high-risk category).

Geoscience Australia held a workshop focused on better understanding and managing procurement risks and developed a series of help guides and supporting materials which were published on the intranet. These resources were implemented and supported with targeted training across the organisation. All staff are encouraged to actively consider procurement risks as part of their routine procurement activities.

IP Australia conducts risk assessments for all procurement approvals, identifying risks through discussions with business areas and suppliers. IP Australia procurements use pre-established WoAG panel arrangements, but when not available, suppliers are engaged under CCS terms and conditions, as per mandatory requirements. The central procurement team reviews and advises on all procurement arrangements, monitoring high-risk procurements, especially those without a panel approach. All team members have completed mandatory training.

Response

Training and awareness-raising activities

Across the portfolio, training has been made available to all central procurement teams and is promoted to all procuring officers through the modern slavery e-Learning modules, including:

- managing modern slavery risks
- modern slavery in public procurement
- identifying and assessing modern slavery risks.

In our role supporting the APS Procurement and Contract Management Profession, DISR facilitated modern slavery sessions at the 2024 Commonwealth Procurement and Contract Management Conference to help build capability across the APS.

In addition, DISR provides staff guidance on modern slavery risk through additional channels including:

- Procurement e-form – DISR has implemented a new e-form for all procurements over \$10,000 GST inclusive. The e-form requires procuring officers and delegates to consider all procurement connected policies, including modern slavery risk, as part of their planning.
- Guidance is provided on the internal intranet to support procuring officers, delegates and contract managers. Guidance includes links to modern slavery training and the Modern Slavery Toolkit hosted on the Modern Slavery Statements Register. The Toolkit includes resources like the Supplier Questionnaire and model modern slavery contract clauses.
- Advisors from DISR's central procurement team provide tailored guidance and undertake a review of high-value or complex procurements to support procuring officers and delegates.
- Representatives from DISR participated in the annual Commonwealth Modern Slavery Statement workshop, sharing learnings across the central procurement team.

Geoscience Australia continues to address the topic of modern slavery with procurement training and awareness sessions. Links to modern slavery guidance from DoF, as well as e-Learning modules, educational resources, guidance materials, and the Modern Slavery Toolkit, are available on the intranet. All centralised procurement team members have completed mandatory procurement training.

Across the portfolio, procuring officers and contract managers are encouraged to discuss the requirements with suppliers and to encourage suppliers to seek training and information from the relevant resources available.

Procurement and contract management activities

DISR has implemented a new e-form for all procurements over \$10,000 GST inclusive. The e-form requires procuring officers and delegates to consider modern slavery risk as part of the planning process. This encourages early planning of procurements and raises awareness of modern slavery risk early in the planning process.

DISR has undertaken a full review of guidance material, seeking to simplify processes for procuring officers to undertake effective procurements. The updated guidance includes links to modern slavery training and resources, including the Supplier Questionnaire. A full review of templates is currently underway, to ensure that modern slavery is captured in all relevant documents. As updates to policy or guidance is released more broadly across government, internal guidance material and policies are updated and changes communicated.

IP Australia takes a proactive stance in mitigating modern slavery risks within its procurement processes. This is reflected in the inclusion of a Risk Assessment template in all procurement approval minutes, which mandates the evaluation of modern slavery risks. Furthermore, IP Australia ensures that procurement activities are utilising the WoAG arrangements that contain specific provisions related to modern slavery. These provisions are integrated into contracts to ensure that all procurement activities align with ethical standards and contribute to the eradication of modern slavery.

Geoscience Australia has inserted modern slavery clauses into contracts if there are no references to it within Head Agreements or Deed of Standing Offer. Staff are encouraged to consider modern slavery risk when conducting risk assessments and undertaking high-risk and/or high-value procurements activities.

Outcomes

Supplier activities

Across the portfolio, expectations with regard to modern slavery risk management are included in relevant approaches to market, and clauses are included in relevant contracts to ensure suppliers are aware of their obligations and comply with ethical standards.

In addition, where DISR establishes a panel, Supplier Questionnaires are distributed to all preferred suppliers to help identify and assess any potential modern slavery risks. These questionnaires include targeted questions aligned with the Commonwealth Modern Slavery Risk Identification Tool, enabling suppliers to disclose relevant practices and risk factors. The responses inform our risk mitigation strategies and ongoing supplier engagement.

Response activities

DISR and Geoscience Australia have guidance available on their websites to assist anyone seeking to make a complaint. Central procurement teams are responsible for managing any complaints received. Complaint clauses are included in contract documentation, with clear articulation of who can be contacted to discuss any issues.



Measuring effectiveness

DISR considers that the controls put in place to counteract risks associated with modern slavery are continually developing and becoming more effective as awareness increases. IP Australia believes the measures taken to mitigate modern slavery risk are proportionate and effective. Some measures identified include the management of risks and controls including:

- Over 2024–25 financial year, the majority of procurement activities in the high-risk sectors were procured through WoAG arrangements such as the People Panel, Digital services panel and PSCP arrangements which all include clauses addressing the Modern Slavery Act.
- To ensure compliance with modern slavery reporting requirements, IP Australia has and will continue to:
 - Make sure procurement officials review procurement approvals to confirm minutes appropriately address modern slavery risks.
 - Develop and implement policies/procedures internally to address any identified risks from feedback provided by relevant parties.
 - Actively engage with agency officials to ensure modern slavery risks are considered.
- Portfolio agencies will continue to engage with contract managers and procurement officials to identify and address risks associated with modern slavery and encourage a culture of continuous improvement to ensure our mitigations remain effective.

Geoscience Australia's Procurement and Commercial function has received positive feedback from staff for its procurement training sessions. They will continue to use the CCS and Commonwealth panel procurement templates for the majority of procurements and will take all reasonable efforts to ensure that modern slavery clauses are included in contracts.

DISR committed to the following actions in the last reporting period, which were all completed:

- Include the Supplier Questionnaire into procurement guidance.
- Review RFT documentation to include Modern Slavery clauses.
- Promote modern slavery considerations and risks throughout the procurement lifecycle.

Looking forward

All entities across the portfolio are committed to strengthening their responses to modern slavery risks through continuous improvement and proactive engagement.

Building on the progress made, the following actions are planned for the 2025–26 reporting period.

DISR will:

- establish an internal Contract Manager Community of Practice within the department which will explore procurement connected policies, including modern slavery risk management, to increase awareness and build capability
- continue a review of documentation to embed modern slavery considerations into procurement planning templates, evaluation criteria, and contract management checklists
- promote training to procurement and contract management staff to strengthen their understanding of modern slavery risks and mitigation strategies.

Geoscience Australia plans to:

- ensure procurement officers undertake refresher training on the modern slavery e-Learning modules and record any modern slavery training undertaken by procurement officers over the 2025–26 financial year
- increase the use of modern slavery tender and contract clauses to embed risk mitigation into the procurement and contract management process, where applicable and in line with the policy framework
- investigate opportunities on how to collect and report on modern slavery risk data internally in relation to insertion of clauses into tenders and contracts.

IP Australia will:

- continue to engage with service providers to understand their labour practices
- review and ensure risk assessments and agency guidance materials are reviewed to ensure they continue to be fit-for-purpose
- develop and provide training material through IP Australia's Learning Experience Platform
- review mandated online training, including refresher courses, periodically for procurement and contract management officials, as appropriate.



Infrastructure, Transport, Regional Development, Communication and the Arts

The Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) provide policy advice and deliver programs, projects and services in the infrastructure, transport, communications and arts sectors, supporting our regions, cities and territories.

The portfolio included 4 NCEs during the reporting period, including National Capital Authority, Australian Communications and Media Authority, Australian Transport Safety Bureau and National Archives of Australia.

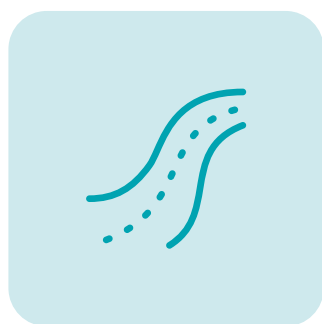
The 5 areas of highest contract value for the portfolio were:

- management advisory services
- transport operations
- computer services
- components for information technology or broadcasting or telecommunications
- personnel recruitment.

Risk

The portfolio's procurement supply chain mirrors the diversity of its outcomes and goals and enhances productivity, resilience, liveability and sustainability of the Australian community. The portfolio promotes broad analysis of potential modern slavery risk in procurements with a focus on industry, product, service, and geographic risks across the breadth of outcomes we deliver. The Modern Slavery Toolkit is used to assess risk across the department and, if required, the procurement and contract clauses are utilised.

High-risk areas in the portfolio align with the 5 key risk areas described in **Section 2**, with the key risk sectors for the portfolio being construction, cleaning services and the transport sector.



Response

Training and awareness

The portfolio has implemented a renewed training strategy to uplift the capability and awareness of its procurement officials and delegates, including, but not limited to:

- launching a new procurement connected policy, bi-monthly face-to-screen training, which incorporates the requirements to assess and manage modern slavery risks
- hosting the modern slavery e-Learning modules on the online learning management system, and promoting this across the portfolio
- periodically publishing intranet news stories to remind staff of modern slavery requirements and objectives
- promoting modern slavery risk in procurement risk assessments
- continuously improving the skills and knowledge of our procurement officials to identify modern slavery risk and improve how it is managed
- providing training and support to suppliers when requested.



Procurement and contract management

The portfolio has taken the following steps to improve procurement and contract management practices:

- Procurement templates and guides are made available that inform officials about how they should assess modern slavery risk and mitigate identified risks. The resources provide guidance about implementing the policy, high risk sectors, procurement value thresholds, and using the Modern Slavery Toolkit and Supplier Questionnaire.
- Approach to market templates contain drafting notes for procurement officials and guidance to potential suppliers on how to respond to modern slavery criteria.
- Clauses are incorporated into contract templates requiring the supplier to take reasonable steps to identify, assess and address risk of modern slavery practices in their operations and supply chains.
- Modern slavery risk management is promoted, within a refreshed 2024–25 procurement connected policy and contract management training strategy, incorporating e-learning and face-to-screen training.
- Assessment of procurement risk is incorporated into the department's risk management framework.
- Templates, resources and guidance are made accessible and maintained on the intranet. Central procurement advisors and procurement officials access these resources when planning and administering procurements and contracts.
- The department's internal governance framework has established an assurance framework where high-risk/high-value procurements are subject to additional review and assurance, which includes considering procurement connected policy risks and modern slavery risks.



Suppliers

Over the reporting period, the portfolio has identified a number of high-value transport, construction and fit-out procurements that have been assessed as medium to high-risk. These procurements have incorporated the appropriate modern slavery clauses in procurement and contract documentation. In addition, modern slavery has been incorporated into pre-procurement industry briefings and contract management planning.

Response

Suppliers and stakeholders can engage with the department and portfolio entities about modern slavery risk and management through direct contact with procurement officials, the central procurement team or via the procurement complaints process. The larger, more complex procurements have incorporated annual performance reviews and specific communication channels. These may identify potential modern slavery incidents and review the effectiveness of grievance mechanisms.

The portfolio is committed to our approach to continue to uplift the capability and knowledge of our procurement and contract management officials to manage modern slavery risk through continuous future improvement, training and support.

The portfolio has not identified potential or actual instances of modern slavery.



Outcomes

The portfolio's approach to building understanding and capability to manage modern slavery risk has been effective over the period, evidenced by procurement officials engaging with the policy, seeking training and advice, and considering modern slavery risk into their simple and complex procurement processes.

Improvements in 2025–26 will be sought through better designed data collection and 2-way engagement between suppliers and procurement officials.

The portfolio's commitment to achieve more frequent and targeted training through face-to-screen and e-learning packages has seen positive outcomes. Regular training sessions are well attended, and feedback indicates that procurement officials understand the importance of the modern slavery policy and their role in implementing it.

We are continually improving our ability to identify and engage with medium to high-risk rated procurements in the initial risk assessment and planning stage. We have made good progress on embedding good practice, especially in those high-risk, construction and infrastructure sector procurements.

The portfolio will implement the following actions and improvements:

- Enhanced contract management framework and procurement compliance strategy, which will drive modern slavery risk management capability and capacity uplift.
- Central procurement teams will continue to enhance how they implement modern slavery risk management into their day-to-day advice and guidance to officials and suppliers.
- Face-to-screen and e-learning resources will be renewed, enhanced and further promoted.
- Examples of best practice and bench marked approaches to modern slavery risk assessment and management will be distributed through communication channels and promotions to improve official's capability in addressing modern slavery risk.
- Procurement digital smart forms will be reviewed and renewed to capture additional modern slavery risk data.

Case study

The department has commenced a high-value construction project in support of the Western Sydney Airport development. This project involves the purchase and installation of noise insulation in residential buildings, including the supply and fit out of insulation products.

Tenderers have been requested to provide details of how they will identify, assess and address risks of modern slavery in their operations and supply chains. Modern slavery risk will be managed within a comprehensive contract management and performance framework.

The department's central procurement team will continue to participate in this and other construction procurements to monitor performance and identify key future learnings.



Prime Minister and Cabinet

In 2024–25, the Prime Minister and Cabinet portfolio comprised 8 NCEs responsible for the following functions:

- Department of the Prime Minister and Cabinet (PM&C) – supporting the Prime Minister and Cabinet, portfolio ministers and Assistant Ministers to improve the lives of all Australians, including through coordination of government activities, effective policy advice and development, and program delivery
- Australian National Audit Office (ANAO) – supporting accountability and transparency in the Australian Government sector through independent reporting to the Parliament, and thereby contributing to improved public sector performance
- Australian Public Service Commission (APSC) – positioning the APS workforce for the future to ensure it meets the demands and expectations of the Australian Government, Parliament and people
- National Indigenous Australians Agency (NIAA) – working in genuine partnership to enable the self-determination and aspirations of First Nations communities, in leading and influencing change across government to ensure Aboriginal and Torres Strait Islander peoples have a say in the decisions that affect them
- Net Zero Economy Authority (NZEa) – promoting an orderly and positive economic transformation as Australia decarbonises, by ensuring regions, communities and workers are supported to manage the impacts, and share in the benefits, of the net zero economy, facilitating public and private sector participation and investment, building community understanding, confidence and engagement, and coordinating net zero transition-related policies and programs
- Office of National Intelligence (ONI) – leading the National Intelligence Community and providing advice to the Prime Minister on intelligence matters
- Office of the Official Secretary to the Governor-General (OOSGG) – supporting the Governor General in the fulfilment of their official duties, including the management and maintenance of the official households and properties and administration of the Australian honours and awards system
- Workplace Gender Equality Agency (WGEA) – accelerating change to achieve gender equality in Australian workplaces, by providing data backed insights, practical enabling support, tools and research, and accessible pathways to leading practice.

During the reporting period, the portfolio's 5 areas of highest contract value were:

- fuels (21%)
- temporary personnel services (9%)
- audit services (9%)
- insurance and retirement services (7%)
- information technology consultation services (5%).

Risk

The NCEs have differing levels of maturity in addressing modern slavery risks in supply chains and operations. The procurement risk profile across the portfolio is relatively low and potential risks of modern slavery were generally considered when entering into arrangements within the high-risk modern slavery categories. There has been a continued effort to promote awareness of modern slavery risks among primary suppliers through the inclusion, where required by a modern slavery risk assessment, of modern slavery model clauses in contract documentation.

The portfolio procured around 13% of its reportable procurement contracts (by value) on goods and services within high-risk modern slavery categories. The portfolio's 10 highest categories by percentage of total value of all new procurement contracts for the period include:

- building construction and support and maintenance and repair services (4%)
- property management services (3%)
- components for information technology or broadcasting or telecommunications (3%)
- computer equipment and accessories (1%)
- computer hardware maintenance and support (1%)
- stationery and office supplies (1%)
- security and control equipment (0.2%)
- window treatments (0.2%)
- security surveillance and detection (0.1%)
- security and personal safety (0.1%).



In addition, the portfolio procured 36% by total value of all new procurement contracts from standing offer panel arrangements. The standing offer panel arrangements most commonly used by the portfolio include:

- Digital Marketplace Panel 1.0 (SON3413842) and 2.0 (SON4102906) (30%)
- Panel for Indigenous Evaluation and Research Services (SON3853285) (8%)
- Property Services Coordinated Procurement Arrangements (SON4115715) (8%)
- Provision of Professional and Associated Services (SON3921486) (7%)
- Software and ERP Marketplace Panel (SON3490955) (7%)
- Hardware Marketplace Panel (SON3541738) (5%)
- Management Advisory Services Panel (SON3751667) (5%).

The portfolio supports a WoAG approach to addressing modern slavery risk through the inclusion of standard modern slavery clauses in Head Agreements for WoAG and coordinated panel arrangements. The entities recognise that the Hardware Marketplace as well as other panels and arrangements use the Modern Slavery Toolkit to assess risks of modern slavery when establishing the panel, including considering the sector and industry, geographic location, and entity history.

NCEs in the portfolio continued to promote existing modern slavery risk tools and guidance to increase awareness of modern slavery risks, and undertake due diligence processes to address modern slavery risks.

Modern slavery risks are incorporated into each entity's internal procurement policy, processes and guidance and any risks of modern slavery are identified through risk assessments. Mitigations are put in place, where appropriate, including use of modern slavery risk assessment tools and inclusion of model clauses in contracts.

NCEs in the portfolio recognise the potential for downstream modern slavery risks under property management services where it involves subcontractors, for example the procurement of cleaning and security services. These risks are mitigated by the WoAG coordinated arrangement's common terms and conditions requiring the service provider to identify, assess and address modern slavery risks in their operations and supply chains including the requirement to implement a Modern Slavery Risk Management Plan in relation to performance of the services.

Modern slavery risks are considered on a case-by-case basis across the portfolio. A number of initiatives have been implemented by portfolio NCEs to identify modern slavery risks in procurement processes.

These include:

- ensuring inclusion of modern slavery risks in standard risk assessment processes and templates
- utilising the modern slavery resources available, including the Modern Slavery Statements Register in relation to modern slavery compliance when considering contracting with suppliers
- application of the Modern Slavery Risk Screening Tool, where required, for procurements in high-risk categories
- incorporating modern slavery contract clauses into the Approach to Market, when required, to strengthen modern slavery requirements
- engaging with targeted suppliers from identified high-risk categories to collect modern slavery statements, determine supplier awareness of modern slavery requirements and request statutory declarations where needed to strengthen supplier awareness of and compliance with modern slavery responsibilities
- working with suppliers and industry experts to understand key risks of modern slavery in the supply chain
- inclusion of modern slavery clauses in panel work orders and contracts as determined by a risk assessment, where not already included in the Head Agreement
- monitoring open source information to identify modern slavery risks that may impact on procurement activities.



Response

Training and awareness-raising activities

During the reporting period, the portfolio continued to commit to training and awareness through a number of actions. Examples are described below.

- Encouraging staff in central procurement teams and staff involved in procurement activities within high-risk categories to complete the modern slavery e-Learning modules.
- Including modern slavery considerations and promoting the Modern Slavery e-Learning modules during internal procurement training sessions.
- Hosting modern slavery e-Learning modules on learning management systems available to all staff and maintaining records of staff who have undertaken modern slavery training.
- Attending modern slavery workshops, including the Attorney-General's Department's 2025 International Contracting Officers Forum.
- Promoting awareness of modern slavery requirements through internal procurement policies, guidance, processes, procedures and templates.

Procurement and contract management

The portfolio NCEs continued to focus on improving procurement and contract management practices to address modern slavery risks. Examples include:

- Incorporating modern slavery considerations into standard procurement risk management practices.
- Providing tailored guidance on the use of modern slavery contract clauses and subsequent contract management activities to monitor suppliers' application of clauses.
- Reviewing panel Head Agreements to map which panel arrangements include modern slavery clauses.
- Reviewing approach to market and contract documentation to ensure, where relevant, the inclusion of modern slavery clauses and compliance requirements.
- Encouraging suppliers to provide statements declaring modern slavery implications in downstream activities.
- Updating websites to raise awareness of modern slavery resources for potential suppliers.
- Hosting links to the Modern Slavery Toolkit on internal intranet sites to assist procurement officers and contract managers.
- Participating in meetings of the IDCP to better understand modern slavery risks and tools and share key learnings.

- Requiring tenderers for procurements above \$4 million to provide a statement of tax records in accordance with the Shadow Economy Procurement Connected Policy to reduce shadow economy activity in the supply chain.

Supplier activities

Over the reporting period, the portfolio continued to focus on increasing engagement with suppliers. Examples include:

- Encouraging suppliers to engage with the modern slavery resources for business on the Australian Government's Modern Slavery in Australia website, including the modern slavery considerations in the Supplier Code.
- Trialling the use of the Supplier Questionnaire when approaching the market in modern slavery high-risk categories.
- Clearly communicating expectations to suppliers about compliance with modern slavery requirements during contract management meetings.
- Incorporating modern slavery obligations in approach to market templates as an unweighted evaluation criterion for high-value procurements to assess the extent to which the tenderer has put in place processes to prevent or mitigate the risk of modern slavery, including mandatory compliance with the Modern Slavery Act in the Tenderer Declaration form.
- Requesting modern slavery statements from suppliers for procurements across targeted high-risk categories and engaging with key suppliers to understand how they are identifying and addressing modern slavery risks.

Response activities

The portfolio is committed to continuous improvement to its approaches to manage modern slavery risks, noting all NCEs are at different stages of maturity. For example:

- Processes on some entity websites to enable affected stakeholders to raise complaints or concerns in relation to modern slavery.
- Use of the CCS and Commonwealth coordinated panel arrangements, and wherever possible including clauses on Notification of Significant Events and modern slavery requirements in the Supplier Code.
- Some entities have a Workplace Relations and/or Health and Safety Committee for staff to discuss modern slavery as a workplace issue.
- Some entities have dedicated mailboxes for officials to raise issues around modern slavery in their procurements or contracts, and for suppliers to raise issues regarding modern slavery.

Outcomes

Measuring effectiveness

The portfolio is committed to assessing effectiveness of actions guided by a commitment to transparency, accountability, and continuous improvement, to ensure alignment with the Modern Slavery Act and incorporating best practice to reduce modern slavery risks and contribute to Australia's broader efforts to combat modern slavery. Portfolio NCEs have taken steps over the 2024–25 financial year to build internal capability and increase staff and supplier awareness in considering and addressing modern slavery risks in procurements. These measures have helped identify opportunities for improvement, including opportunities to improve staff capability and supplier compliance with modern slavery requirements. The portfolio's actions in raising awareness, training staff, and assessing modern slavery risks are considered proportionate to their operations and the risk profiles of their procurement activities. The portfolio recognises the need to continue to identify and establish processes for assessing the effectiveness of actions taken to address modern slavery risks.

Examples of key actions by portfolio NCEs are described below.

- Strengthening internal processes to identify and manage modern slavery risks within procurement and supply chains, including updates to tender documentation and risk identification procedures.
- Monitoring modern slavery training completion rates, particularly among procurement staff
- Assessing supplier awareness of modern slavery obligations through contract management activities.
- Improving internal processes including enhanced risk assessment templates to ensure relevant modern slavery risks are consistently identified and addressed during procurement planning.
- Reviewing responses to targeted questions on modern slavery in procurement plans and risk assessments to evaluate internal capability and identify where more support may be required.

Looking forward

The portfolio is committed to improving its approach to managing modern slavery responses, noting all NCEs are at different stages of maturity.

The portfolio will continue to:

- promote awareness of modern slavery risks in procurement and contract management activities
- encourage inclusion of modern slavery clauses where procurement activities relate to areas identified as having a high risk of modern slavery
- enhance procurement policy and process guidance to incorporate modern slavery requirements
- collaborate with other entities to share best practice, resources and key learnings.

PM&C will continue to build awareness and capability in identifying and mitigating modern slavery risks in procurement and contract management practices for the high-risk modern slavery categories and share learnings with the other portfolio NCEs. This includes:

- continuing work on the development and implementation of a survey tool to assist in measuring business areas understanding and use of the resources in the Modern Slavery Toolkit
- continue the development and implementation of a process for managing and responding to alleged instances of modern slavery
- encouraging portfolio entities to share practice and learnings in relation to modern slavery in procurement and contract management.

The ANAO will continue to focus on high-value/high-risk procurements by:

- conducting modern slavery assessments during planning and execution stages
- delivering ongoing training, embedding risk assessment and management practices into procurement processes
- using model contract clauses to support effective identification, mitigation, and management of modern slavery risks.

The APSC has identified the following actions to strengthen its response by:

- reviewing and strengthening risk assessments to ensure that modern slavery risks are consistently and clearly captured
- embedding modern slavery considerations into training and routine contract reviews, helping to ensure continued compliance with obligations
- enhancing internal guidance to better support staff in addressing modern slavery risks during approaches to market and contract management.

The NIAA will continue building internal capability through:

- providing targeted training and accessible resources on modern slavery to procurement officers
- enhancing intranet content and guidance documents to improve the usability and visibility of the agency's modern slavery toolkit
- engaging with stakeholders early in the procurement process to embed modern slavery considerations from the outset
- supporting NIAA staff in identifying and managing potential risks as part of ethical and responsible procurement practices.

The OOSGG will maintain current arrangements and monitor any significant changes to contracts or procurement activities that could affect modern slavery risk exposure. The agency acknowledges that its maturity in this area is still developing and that further improvements may require additional resources over time.

WGEA plans to increase engagement with suppliers, particularly where offshore sourcing has been identified or increased. This will include requesting modern slavery statements from major ICT suppliers to support transparency and encourage risk awareness in supply chains.

The ONI will continue to promote awareness of modern slavery resources within the agency and use model contract clauses to manage modern slavery risks as required.



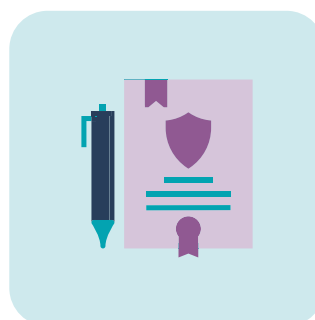
Case study

The ANAO has implemented an internal threshold for addressing modern slavery for procurements over \$200,000.

The approach to market includes the requirement for a mandatory Tenderer Declaration to be completed stating that the tenderer, and, to the best of its knowledge, its proposed subcontractors, do not engage in any exploitative labour practices (including slavery, forced labour and human trafficking), regardless of whether that practice is lawful in the relevant location.

The approach to market includes an unweighted evaluation criterion to determine whether the tenderer is required to report under the Modern Slavery Act and evaluate the extent to which the tenderer has put in place processes to prevent or mitigate the risk of modern slavery in its operations or supply chains for the purposes of delivering the services.

Additionally, the ANAO has added an optional clause to its Deed of Standing Offer template for establishing standing offer arrangements, where, if the procurement under the panel arrangement is greater than \$200,000 and assessed as having a high risk of modern slavery, the supplier needs to complete and submit the Supplier Questionnaire as part of their response to the Request for Quote.



Social Services

In 2024–25, the Social Services portfolio consisted of the following NCEs:

- Department of Social Services (DSS)
- Services Australia
- NDIS Quality and Safeguards Commission
- Domestic, Family and Sexual Violence Commission
- Australian Institute of Family Studies
- National Commission for Aboriginal and Torres Strait Islander Children and Young People.

The portfolio is responsible for achieving the Government's social policy outcomes and delivering social security priorities through policy advice, program administration and research.

DSS provides a level of procurement support to the NDIS Quality and Safeguards Commission, the Domestic, Family and Sexual Violence Commission and the National Commission for Aboriginal and Torres Strait Islander Children and Young People.

The National Commission for Aboriginal and Torres Strait Islander Children and Young People commenced operations on 13 January 2025 and operates under a shared services MoU with DSS. As a newly formed entity, its operations, procurement, and supply chains comply with DSS policies and procedures.

The Domestic, Family and Sexual Violence Commission also operates under a shared services MoU with DSS, and its operations, procurement, and supply chains also comply with DSS policies and procedures.

The portfolio's supply chains involve a diverse range of products and services, provided by a wide variety of suppliers through contractual agreements. The portfolio operates in a devolved procurement environment, where business areas are responsible for contracts that they are managing, including the assessment and reporting of potential risks for modern slavery.

Modern slavery risks are considered on a case-by-case procurement basis using the Modern Slavery Risk Screening Tool. Where a high-risk procurement is to be undertaken, additional contractual clauses and reporting requirements may be included in the Head Agreement or contract, as required.

During 2024–25, the portfolio entered into approximately 2,628 contracts, with a total procurement value of approximately \$2.2 billion. Potential modern slavery risks were considered by the portfolio agencies when entering into these arrangements.

Across the portfolio, the highest categories, by contract value, relate to the following United Nations Standards and Products Service Codes:

- computer services
- data services
- community and social services
- temporary personnel services
- property management services.

Risk

For the portfolio, the higher risk areas of modern slavery have been identified as relating to ICT, property and facilities management, construction, and textile procurements.

The portfolio procures security guarding and cleaning services under the WoAG PSCP Arrangements.

During 2024–25, the portfolio has undertaken several actions in support of identifying potential modern slavery risks. These include, but are not limited to:

- Maintaining a portfolio Procurement Cross Agency Working Group to improve consultation and knowledge sharing between agencies on all elements of procurement. This approach supports all agencies to identify better ways to embed modern slavery considerations and risk identification/mitigation when undertaking procurement. These discussions include both NCEs and CCEs alike.
- The portfolio maintained its presence with all meetings of the IDCP to ensure it remained aware of driving changes. Further, there was a strong attendance at the International Contracting Officers Forum 2025, where the topic related to combatting human trafficking in government procurement practices.
- General guidance on modern slavery risks is available to all officers undertaking procurement.
- Procurements that are at a higher risk of modern slavery have the inclusion of key performance indicators and a Risk Management Plan requirement that is actively monitored via their respective Contract Management Plan.
- DSS has included the consideration of modern slavery risks into its tailored procurement risk assessment template.
- The NDIS Quality and Safeguards Commission has incorporated a preliminary risk assessment into its procurement plan, supporting the improved identification of risk and their treatment for procurement processes.
- Modern slavery training is strongly recommended to all procurement officers, especially those undertaking high-risk procurements.

Response

Training and awareness raising

The modern slavery e-Learning modules are utilised across the portfolio as the basis for training and awareness.

DSS circulates communications to all procurement officials to ensure they remain aware of potential modern slavery risks, drawing attention to the training that is readily available to all staff.

DSS holds an expectation that all officers involved in central procurement will complete the Australian Government modern slavery e-Learning modules annually and embed their learnings into relevant procurements at all stages, from contract development through to finalisation.

Services Australia promotes and encourages procurement practitioners to undertake the modern slavery e-Learning modules.

In addition, the Australian Institute of Family Studies has committed to incorporating procurement training into new starter inductions, to be conducted for all procurement officials every year, and for other employees who are conducting procurement activity every 2 years.

Services Australia provides suppliers with details on modern slavery obligations during relevant approach to market processes.



Procurement and contract management

Officials are required to consider modern slavery risks in all procurements undertaken by answering specific, and targeted questions through the procurement process. Contract managers are reminded to consider modern slavery risks throughout the life of the contract, especially when there is a contractual change. Procurement documents are updated to reflect changes, where appropriate, to ensure they remain accurate and appropriate. Portfolio entities regularly review all procurement policies and procedures, including the application of modern slavery considerations.

Across much of the portfolio, modern slavery risks are identified and communicated at the approach to market stage, however, it is recognised that this needs to remain a focus for the life of the procurement and supplier engagement. The portfolio maintains an awareness and commitment to ensure modern slavery risk identification is embedded into policies and procedures, both current and developing.

The portfolio is looking at how we communicate with both suppliers and their respective sub contractual arrangements for high-risk procurements. Doing so supports transparency of supply chains and amplifies their obligations towards addressing modern slavery risks in all procurement activities. This is undertaken through the life of the contract, from request for quote stage through to conclusion of the contract.

Services Australia has implemented modern slavery business rules to assist procuring officials to consistently use modern slavery contract clauses and promote the use of modern slavery risk assessments by procuring business areas, as required.

The NDIS Quality and Safeguards Commission is reviewing its current templates and internal policies to ensure compliance with modern slavery requirements, and the broader Commonwealth Resource Management Framework is upheld.

Supplier activities

DSS has used the Supplier Questionnaire in its procurement of minor fit out/construction services.

Services Australia also uses the Supplier Questionnaire in instances where medium to high risks for modern slavery are identified through application of modern slavery business rules, or a risk assessment. Suppliers have demonstrated a good understanding of modern slavery risks and their active management of those risks.

Further, Services Australia has taken a proactive approach in terms of managing any modern slavery risks. This year, Services Australia's central procurement teams requested 3 major property and construction services suppliers in high-risk categories complete the Supplier Questionnaire to support Services Australia's understanding of supply chain risks. These suppliers demonstrated a good understanding of modern slavery risks and their active management of those risks.

Services Australia manages a corporate wardrobe contract for the supply of uniforms. Under this arrangement, Services Australia's supplier of corporate uniforms is required to actively manage its modern slavery risks, and the supplier must maintain a Modern Slavery Risk Management Plan.

Further, Services Australia has incorporated biannual ethical sourcing updates into the governance meeting schedule with the supplier.



Response activities

DSS, Services Australia, Domestic Family and Sexual Violence Commission, the Australian Institute of Family Studies, the NDIS Quality and Safeguards Commission, and the National Commission for Aboriginal and Torres Strait Islander Children and Young People have confirmed there are processes in place to enable affected stakeholders to raise complaints or concerns. This process supports the ability to capture complaints that relate to Modern Slavery risks. Further, the DSS website also provides specific details around human trafficking and slavery, in addition to information about both the support for trafficked people program, and the forced Marriage Specialist support program.

The portfolio is not aware of any potential or actual instances of modern slavery in its supply chains during the reporting period.



Outcomes

Measuring effectiveness

Procuring officials who enter into a contract in one of the identified high-risk areas are required to undertake an assessment, which includes the Modern Slavery Risk Screening Tool, to determine whether there is a medium or high risk in the procurement. Procuring officials are also encouraged to include a risk assessment into the lower risk procurements and seek guidance from their respective central procurement advice team as required.

The NDIS Quality and Safeguards Commission has identified a need to increase capability through staff training and data capture to improve practice and reporting against modern slavery requirements.



Looking forward

The portfolio is committed to continue working collaboratively with our officers and suppliers, raising awareness of potential modern slavery risks in procurements that are undertaken, in line with modern slavery policy requirements.

Further, bi-monthly Cross Agency Working Group discussions will continue to assist in raising areas of concern or work being undertaken that other portfolio agencies can leverage from.

The portfolio is currently working to apply a consistent approach in the availability of appropriate training that all central procurement officials will be required to undertake. Each agency either has, or is in the process of currently formalising, the inclusion of the Modern Slavery e-Learning modules into their own respective e-Learning platforms, or provision of directions for officials to the Modern Slavery Statements Register. Further, consistent with the establishment of the Procurement and Contract Management Profession, the portfolio is uplifting its central procurement teams' capabilities, including modern slavery knowledge and awareness.

Services Australia will identify strategic suppliers in high-risk industries for modern slavery and request their completion of the Supplier Questionnaire. Doing so will support additional opportunities to evaluate Services Australia's modern slavery risks.

Due to the infancy of the National Commission for Aboriginal and Torres Strait Islander Children and Young People, internal capacity is still being built upon, however, it is committed to implementing a robust monitoring and evaluation processes that align with the CPRs.

The Domestic Family and Sexual Violence Commission will continue to uplift its procurement capabilities, including staff knowledge and awareness on modern slavery.

Further, the Australian Institute of Family Studies is committed to continuing to ensure procurement officials are appropriately trained for awareness relating to modern slavery.

Treasury

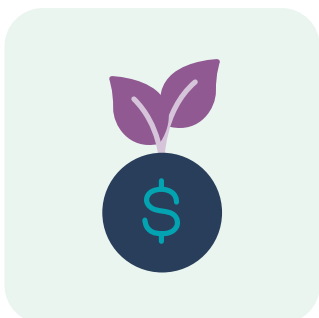
The Treasury portfolio undertakes a range of activities aimed at achieving strong sustainable economic growth for the good of Australians. The work of the Treasury portfolio entails providing advice to portfolio Ministers, as well as the effective implementation and administration of policies that fall within the portfolio Ministers' responsibilities. The Treasury portfolio included 15 NCEs. These NCEs are:

- Australian Bureau of Statistics
- Australian Competition and Consumer Commission
- Australian Office of Financial Management
- Australian Prudential Regulation Authority
- Australian Securities and Investments Commission
- Australian Taxation Office
- Commonwealth Grants Commission
- Department of the Treasury
- Inspector-General of Taxation
- National Competition Council
- Office of the Auditing and Assurance Standards Board
- Office of the Australian Accounting Standards Board
- Productivity Commission
- Royal Australian Mint.

During the reporting period, the 5 areas of highest contract value for the portfolio were:

- temporary personnel services
- computer services
- lease and rental of property or building
- property management services
- software.

This list was calculated using AusTender reporting by UNSPSC codes and total contract values.



Risk

Agencies within the portfolio include modern slavery risk as a standard consideration in procurement processes.

While not in the top 5 areas of highest contract value, the Treasury portfolio sees the main category of risk being Information Communication and Technologies, with product specific risk being hardware, which include goods such as laptops, printers and servers, when sourced overseas. The portfolio considers these risks in undertaking procurements and considers the maturity of potential suppliers in responding to modern slavery risks, and the visibility of downstream suppliers, which at times can be limited.

Portfolio agencies will undertake a risk assessment to assess the risk of modern slavery in supply chains for procurements over \$10,000 GST inclusive. The portfolio uses tools such as The Global Slavery Index, The Responsible Sourcing Tool, and statements published on the Modern Slavery Statements Register.

Where appropriate, portfolio agencies will include the Supplier Questionnaire for procurements considered to be medium to high risk, allowing suppliers to outline how they manage, understand and have oversight of their supply chain. This information is considered as part of the evaluation process. At the point of contracting, medium to high-risk categories are monitored, with contracts containing modern slavery clauses.



Response

Training and awareness

Portfolio agencies encourage their Central Procurement teams to complete the Modern Slavery e-Learning Modules, with some agencies mandating this. In addition, procuring staff from portfolio agencies attended information sessions delivered by the Attorney-General's Department that provided information detailing how to identify and address modern slavery risks in government operations and supply chains.

Further, procurers within agencies were made aware of the Australian Government's expectations to address modern slavery risk in procurement and supply chains, with agencies requiring procurers to assess and consider the risk of modern slavery as part of their process. Where required, portfolio agency procurers have used the Risk Screening Tool as part of procurement processes to consider:

- sector and industry risks
- product and service risks
- geographic risks
- supply chain model risks.

Collaborative and open relationships with suppliers are encouraged to improve transparency regarding their own, and downstream, supply chains and actions to support policy.



Procurement and contract management

Throughout the portfolio, agencies have used different approaches to improve procurement and contract management processes to consider modern slavery risks over the 2024–25 financial year, including:

- Embedding policy requirements within procurement processes, including procurement plans, spending proposals, tenders, and contracts.
- Advising procurers about requirements to manage modern slavery risk, on a case-by-case basis. This includes providing advice to evaluation panels regarding how to manage modern slavery risk.
- Undertaking risk assessments for procurements, commensurate with the complexity of the contract and the potential risk of modern slavery in the supply chain. Some agencies mandate modern slavery risk assessments for procurements in high-risk areas, which are subsequently reviewed by the central procurement team, as part of the procurement process.
- Utilising the modern slavery tender and contract clauses for processes that identify a medium to high risk of modern slavery.
- Examining suppliers' modern slavery statements to verify the extent to which the suppliers are managing the risk of modern slavery.
- Undertaking due diligence when procuring from panels for high-risk procurements, including reviewing Head Agreements and contract terms to ensure policy requirements are included.
- Updating internal procurement processes to determine gaps, including processes to help identify and manage modern slavery risks. This includes adding a requirement for officers to complete the Modern Slavery Risk Screening Tool when planning a new procurement or renewing an existing contract, for example.
- Updating intranet content, including a page that provides easy access to information regarding modern slavery and links to relevant training.
- Providing direction on how to meet all procurement related requirements, such as modern slavery risk, through procurement checklists available to all staff.

Supplier activities

Throughout the portfolio, agencies have used the following mechanisms to engage with suppliers, or to promote supplier engagement on modern slavery risk:

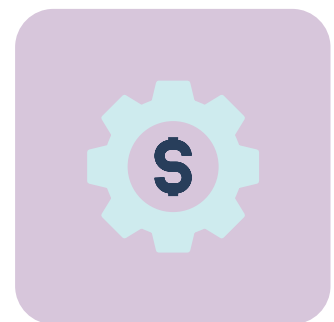
- Use of the Supplier Questionnaire for medium and high-risk procurements.
- Contract reviews and checks for high-risk procurements.
- Expectations are set out in contracts for all medium and high-risk procurements.
- Regular communication with suppliers regarding expectations, and mechanisms to report any detected instances for at-risk categories of purchase.
- Standard modern slavery clauses have been added into contracts and approach to market documents when the procurement has been identified as being high-risk for modern slavery.
- Annual statements issued by suppliers under Modern Slavery legislation have been examined while evaluating their quotes and are considered as part of the tender response.
- Communication of the organisation's expectations to suppliers, including specifically addressing modern slavery issues in approach-to-market response documents and supplier contracts.



Response activities

During the 2024–25 financial year, some portfolio agencies had response activities in place, while others were in the process of developing and/or enhancing their processes. Below are some examples of these processes:

- Managing any modern slavery complaints or concerns raised, through a central procurement team.
- Using specific committees to raise workplace issues as they relate to modern slavery.
- Providing stakeholders an email address, that is publicly available through a website, to raise any complaints or concerns. All complaints received by this inbox are investigated by a dedicated compliance officer within the agency.
- Regular engagement between central procurement teams and internal stakeholders to discuss procurements and any concerns, specifically relating to Modern Slavery.
- Providing an internal portal for staff to anonymously report concerns.
- Providing a point of contact to tenderers for active procurements processes.
- Outlining avenues for tenderers and suppliers to make procurement related complaints on a public facing website.
- Continuing to enhance procurement reference material and promote awareness of modern slavery risk identification.



Outcomes

Measuring effectiveness

The Treasury portfolio has assessed the listed actions, during the 2024–25 financial year, as being effective, using measures described below.

- An increased frequency of information shared internally with procurers and contract managers, regarding modern slavery risks.
- Increased engagement by central procurement teams with contract managers, who manage medium to high-risk contracts.
- Increased awareness and inclusion of the Supplier Questionnaire in both medium and high-risk procurements.
- Increased completion of the Supplier Questionnaire by tenderers, without the need for clarification.
- Staff feedback across the Portfolio indicates that they find the training to be beneficial.
- Increased engagement with key suppliers to understand how they are addressing their modern slavery risks.
- An increased ability to identify risks in procurements from more stringent assessments and engagement.
- Central procurement teams have an increased awareness of tender processes containing modern slavery tender clauses, in comparison to previous reporting periods.
- Agencies ensuring external probity, legal and procurement advisors are engaged for high-value/high-risk procurements to ensure modern slavery risk is adequately assessed.
- Agencies will continue to use the tools and relevant measures to assess the effectiveness of the listed actions to address modern slavery risks in future reporting periods.

Forward looking actions

To help strengthen the Treasury portfolio's response for the next reporting period, the following actions are planned:

- Track any noticeable trends in cases of modern slavery and consider how related risks can be appropriately addressed by agencies throughout the procurement cycle. This includes documenting processes regarding how to respond effectively should suspected situations of modern slavery be identified.
- Further consider modern slavery risks that are appropriate to specific circumstances, noting it cannot be a 'one size fits all' approach.
- Ensuring specific positions or teams within agencies own the responsibility of ensuring staff are provided comprehensive education and training regarding all aspects of procurement, including monitoring of how suppliers are addressing modern slavery risk.
- Implementation of revised policies and procedures, ensuring modern slavery is captured and highlighted across the agency.
- Increase the use of the Modern Slavery Risk Screening Tool.
- Increase the number of risk assessments undertaken and further detail sought on high-risk/value procurements.
- Increase the use of tools including the modern slavery tender and contract clauses to embed risk mitigation into the procurement and contract management process.



Parliamentary departments

The parliamentary departments support the functions of the Australian Parliament and the work of parliamentarians through the provision of professional services, advice and facilities, the ongoing maintenance of Australian Parliament House; making the building, and the important activity that takes place within it, accessible.

The parliamentary departments consist of 4 core departments; Department of Parliamentary Services (DPS), Department of the House of Representatives, Department of the Senate, and Parliamentary Budget Office (PBO), each with distinct and overlapping roles and responsibilities. Procurement activities are the responsibility of each parliamentary department, with each having its own procurement advisory functions.

Department of Parliamentary Services

DPS undertakes the majority of procurements amongst the parliamentary departments, supported by a dedicated procurement and contracts team, which provides advice and support to business areas.

Department of the House of Representatives and Department of the Senate

The Departments of the House of Representatives and the Senate do not transact in the high-risk areas of ICT hardware, construction, cleaning and security services, investments, or textiles. The potential for the departments to cause, contribute to, or be directly linked to modern slavery through their operations and supply chains is remote. The majority of the departments' supplier expenditure is with mandatory coordinated procurement arrangements, or are low in value and risk.

Parliamentary Budget Office

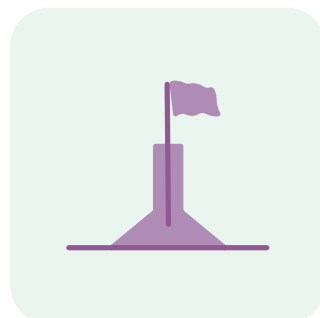
The PBO provides independent and non-partisan analysis of the budget cycle, fiscal policy, and the financial implications of policy proposals to parliament. The PBO conducts a small range of procurement activities and does not carry out any procurement involving industries whose supply chains are associated with modern slavery as detailed on responsiblesourcingtool.org, these services are sourced through DPS.

Risk

The breadth of the parliamentary departments' roles and responsibilities means that their procurement supply chains are wide-ranging. Staff are encouraged, prior to conducting a procurement process, to consider supply chain operations to better understand the market and industries from which they are sourcing goods and/or services. Supply chains are often made up of a complex network of activities and in many instances the parliamentary departments do not procure directly from the manufacturer.

The industries identified as potentially high-risk for the parliamentary departments during the reporting period are described below.

- Building and Construction Support and Maintenance Services – this industry is heavily reliant upon global supply chains for a wide range of raw materials and commodities. Due to the nature of business models within this sector there is often limited knowledge of downstream market and supply chain issues, resulting from decreased visibility of labour operations, increasing the risk for modern slavery.
- Textiles – similar to the building and construction category, this industry relies upon global supply chains for a wide range of raw materials. Decreased visibility of labour operations increases the risk for modern slavery.
- ICT Hardware products – this industry has extensive supply chain operations for parts and components to create the final product. Hardware products tend to be manufactured in geopolitical regions with high governance concerns, resulting in a high risk of human rights violations. Downstream supplier arrangements are often unknown increasing the risk for modern slavery.



In 2024–25, DPS identified 2 high-value procurements that contained modern slavery risks.

1. DPS25000799– Linen Services for Australian Parliament House (APH)
2. DPS24001132– Labour Hire Services for Catering and Event Functions Panel.

The central procurement team worked with the line area to identify risks, include appropriate clauses in the bespoke RFT Response and Contract, and to evaluate the supplier information provided. DPS is satisfied that the successful suppliers have appropriate processes to address modern slavery risk in their supply chains.

Response

Training and awareness-raising

Procurement officers have an important role to play in combating modern slavery in government operations and supply chains.

The parliamentary departments do not currently mandate modern slavery training, however, officers undertaking procurement activities are encouraged to:

- familiarise themselves with the Modern Slavery Act
- utilise the Modern Slavery Toolkit, where appropriate
- complete the modern slavery e-Learning modules.

The parliamentary departments recognise the importance of developing a greater understanding of the nature of modern slavery risks in global supply chains. In future the parliamentary departments may explore mandatory obligations to undertake modern slavery training as part of procurement and contract management training.



Procurement and contract management activities

The parliamentary departments use the CCS and standard contract terms and conditions when engaging with suppliers. The standard contract terms (section C.23– Compliance with Commonwealth Supplier Code of Conduct) cover modern slavery considerations. The parliamentary departments encourage staff to highlight and manage modern slavery risks on a case-by-case basis and embed risk information into their contract management processes.

During the planning phase of procurement activities, officers are encouraged to:

- assess risks of modern slavery in its procurement and contract supply chains, where appropriate
- identify high-rated risk industries and work with suppliers to assess and address the risks of modern slavery in their operations using relevant clauses, and reportable actions if and when required.

As an ongoing assurance measure, work with supply chains via contract management activities is used to identify, manage, monitor and redress any adverse impacts on human rights, if identified and/or reported.

Supplier activities

The parliamentary departments ensure they engage with well-established, reputable and authorised suppliers when procuring building and/or construction maintenance services. They rely on contract managers, as the subject matter experts, to be aware of modern slavery risks associated with their suppliers and within the context of their industry.

The parliamentary departments used the Supplier Questionnaire, modern slavery contract clauses and RFT clauses for identified bespoke contracts with identified modern slavery risks. The parliamentary departments will continue to seek to increase supplier interactions and engagements to better address modern slavery risks.

Outcomes

Measuring effectiveness

During 2024–25, the parliamentary departments continued raising awareness on modern slavery during the procurement lifecycle and managing risks on a case-by-case basis. In future, the parliamentary departments will seek to:

- implement post-training questionnaire to staff and relevant stakeholders
- modify systems (Procure-to-Pay) to better track if a procurement activity has modern slavery considerations and what/how actions have been taken (e.g. inclusion of tender clauses A or B), to assist in better reporting data
- consider additional capabilities for future training and reporting. This work has been included under the procurement uplift program within DPS.



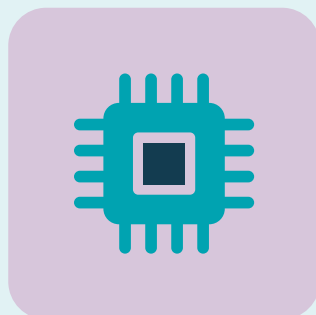
Looking forward

As part of the uplift in DPS procurement capability, the policies and procedures are being reviewed and updated to align with Government's commitment to address modern slavery risk in government supply chains. DPS is looking to incorporate the updates into its Procure-to-Pay system, Procurement Policy and DPS specific templates.



Section 4

Consultation



Paragraph 16(1)(f) of the Modern Slavery Act requires the reporting entity to describe the process of consultation with any entities that the reporting entity owns or controls. This section describes the consultation process to prepare this Commonwealth Statement and manage the whole-of-government response to addressing modern slavery risk in public procurement.

The Attorney-General's Department leads the development of the annual Commonwealth Statement and consults all NCEs through an interdepartmental committee.

The IDCP is the key mechanism for consultation and collaboration across the Commonwealth to develop the annual Commonwealth Statement and drive the government's priority to address modern slavery risks in its operations and supply chains. The IDCP was established in 2019, during the Commonwealth's first reporting cycle under the Modern Slavery Act, to drive the strategic direction of the Australian Government's response to modern slavery risks in Commonwealth supply chains and operations.

The IDCP is chaired by the Attorney-General's Department and comprised of approximately 40 NCEs, with each portfolio represented by the relevant Department of State.

Members of the IDCP play a key role in:

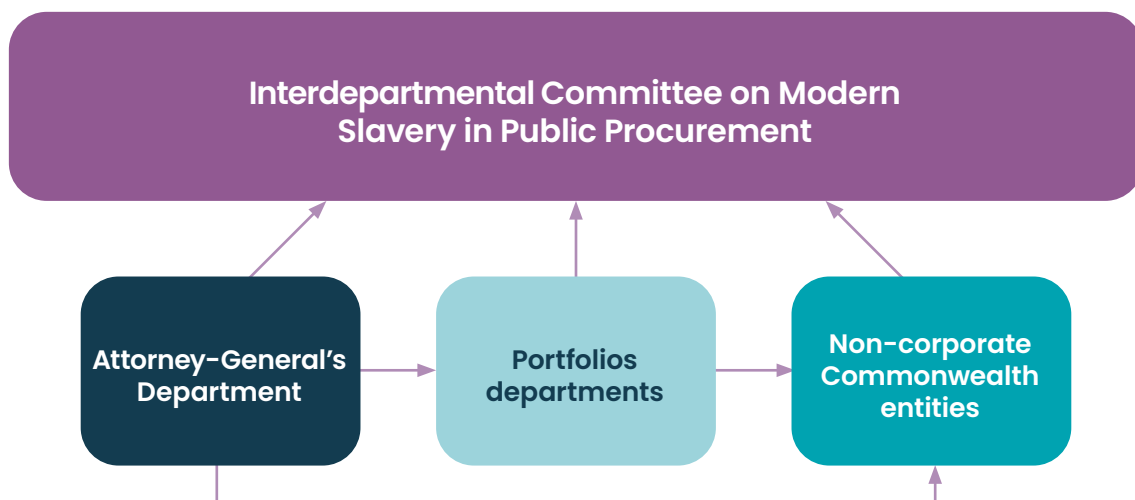
- developing and implementing tools and resources to identify, assess and address modern slavery risks in Commonwealth operations and supply chains
- communicating relevant information and updates to staff
- developing and finalising the Commonwealth Statements.

During the reporting period, the IDCP held 3 formal meetings and a workshop to steer the strategic direction of the annual Commonwealth Statement and drive the Government's actions to combat modern slavery risks in Commonwealth procurement and investments.

Through the IDCP, the Attorney-General's Department has also consulted and collaborated with Commonwealth departments and agencies to progress the development of tools and resources to strengthen Commonwealth capability to identify, assess and address modern slavery risk in Commonwealth procurements and investments.

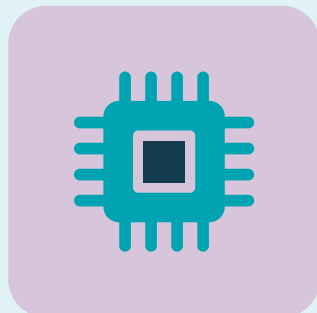
Targeted consultations and engagements

During the reporting period, the Attorney-General's Department consulted and collaborated extensively with Commonwealth departments and agencies to inform the development of modern slavery risk management tools and frameworks.





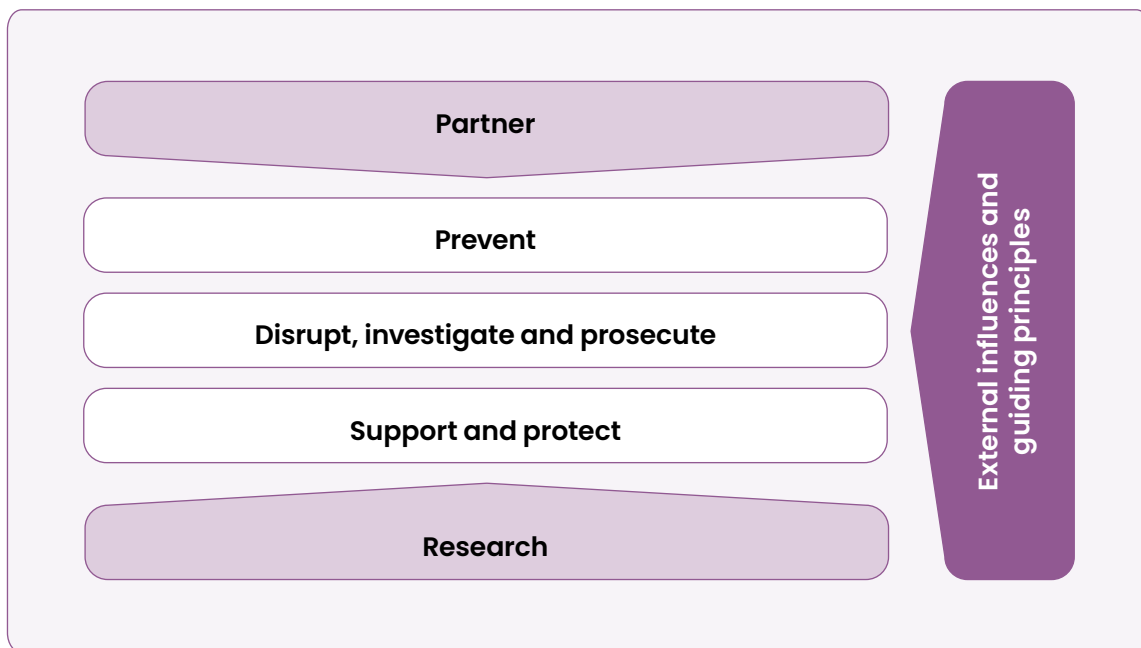
Section 5



Paragraph 16(1)(g) of the Modern Slavery Act allows reporting entities to include any other information that the reporting entity thinks is relevant. This section outlines other actions the Australian Government is taking to combat modern slavery.

Related activities

The Australian Government's work to address modern slavery risks in Commonwealth supply chains and operations sits within a broader program of work to combat modern slavery. This work is underpinned by the *National Action Plan to Combat Modern Slavery 2020–25*, which sets out a work program of 46 action items that address the Australian Government's 5 strategic priorities.



Key work undertaken during the reporting period

In addition to the actions undertaken across the Commonwealth as detailed in sections 1–4, complementary work undertaken during the reporting period to address modern slavery in Australia and abroad includes:

Enhancing
Australia's
response

Engagement

International

Support
and
protect

Investigation
and
prosecution

Enhancing Australia's response

- Releasing the Australian Government's response to the statutory review of the Modern Slavery Act, undertaken by Professor John McMillan AO, on 2 December 2024. The response agrees in full, in part, or in principle, to 25 of the 30 recommendations, and notes 5 recommendations. The Government committed in the response to enhanced guidance, support for businesses, and further consideration of reforms to the Modern Slavery Act in consultation with stakeholders. The Attorney-General's Department is implementing the Government's response.
- Appointing the first Australian Anti-Slavery Commissioner, Chris Evans (the Commissioner). The Commissioner commenced his 5-year term on 2 December 2024. The Commissioner works across government, industry and civil society to promote compliance with the Modern Slavery Act; engages with victims and survivors of modern slavery; and helps fight modern slavery in Australia and abroad.
- Continuing work through the Standing Council of Attorneys-General to tackle the issue of forced marriage through a coordinated national response, including enhancing civil protections and remedies for individuals in or at risk of forced marriage.
- Implementing the *Strengthening Employer Compliance Act 2024* (Cth) (SEC Act) from 1 July 2024. This implementation strengthened the legislative framework in the *Migration Act 1958* (Cth) by increasing the enforcement capabilities of the Department of Home Affairs to address non-compliance with employer obligations. This introduced new compliance capabilities including:
 - Three new criminal offences for using a person's visa status to exploit them in the workplace.
 - A protective measure that prohibits dishonest employers found to have engaged in serious, deliberate, or repeated exploitation from employing additional temporary migrant workers for a period of time.
 - Increased penalties for non-compliance with employer obligations and new compliance tools (compliance notices and enforceable undertakings) to support a proportionate response to non-compliance.
 - Repeal of section 235 of the Migration Act, under which it was a criminal offence to work in breach of a visa condition, or to work as an unlawful non-citizen, and which deterred some temporary migrants from reporting workplace issues.
- Addressing migration related barriers to reporting exploitation or resolving workplace issues, while upholding the integrity of the migration system through reforms to visa settings. These include:
 - On 1 July 2024, enhanced mobility provisions for temporary migrants under certain 'employer sponsored' programs (subclass 482, 494, and 457 visas), making it easier for sponsored workers to leave an exploitative employer.
 - On 24 July 2024, a Strengthening Reporting Protections pilot commenced, which provides protection from visa cancellation in prescribed circumstances to address fears that reporting exploitation or leaving an exploitative employer will result in visa cancellation. This pilot balances the Government's commitment to address migrant worker exploitation alongside its commitment to uphold the integrity of the migration program.
 - On 24 July 2024, a Workplace Justice Visa Pilot commenced to enable migrant workers who have been exploited while working in Australia to extend their stay for a short period to effectively pursue workplace claims.
- Developing an information and education package to help educate temporary visa holders and their employers about migration related workplace rights and obligations.
- Legislating to increase sanctions for wage underpayment under the Fair Work Act. On 1 January 2025, the *Fair Work Legislation Amendment (Closing Loopholes) Act 2023* (Cth) commenced, establishing a new criminal offence for intentional wage underpayment.
- Establishing the *Voluntary Small Business Wage Compliance Code* (the Code), a legislative instrument created under the Fair Work Act. The Code is designed to help small business employers avoid criminal prosecution where underpayments were unintentional. To support the Code, the OFWO developed the corresponding *Guide to Paying Employees Correctly* and the *Voluntary Small Business Wage Compliance Code* to help small business employers take steps to pay their employees correctly and understand and access the protections of the Code.
- Progressing a nationally consistent approach to labour hire regulation in partnership with states and territories to ensure consistent protections for labour hire workers across Australia.

Engagement

- Implementing targeted outreach, education and awareness raising efforts to vulnerable communities of modern slavery to improve their understanding of their rights and encourage the reporting of modern slavery matters or concerns prior to criminal activity occurring.
- Delivering awareness-raising and training for frontline responders on indicators of human trafficking and slavery – resulting in increased disruptions, proactive identification and referral of suspected cases of modern slavery to law enforcement agencies.
- Maintaining international, national, and local partnerships with both government and non-government sectors, improving understanding and increasing the effectiveness of an operational response.
- Delivering a social media human trafficking awareness-raising campaign in line with World Day Against Trafficking in Persons.
- Chairing the Intergovernmental Network on Modern Slavery in Public Procurement, with membership from procurement officers across Australian, state, and territory governments.
- Providing targeted guidance and support to businesses to meet their reporting obligations under the Modern Slavery Act through face-to-face, virtual and telephone engagement, and through a helpdesk for reporting entities.
- Implementing education, awareness-raising and outreach to the community, targeting individuals vulnerable to forced labour, including international students, migrants, and workers in regional and rural communities.
- Publishing *Modern Slavery Lived Experience Engagement and Empowerment* guidance to promote safe, ethical and trauma-informed engagement in Australia.
- Delivering awareness-raising and training for frontline responders on indicators of human trafficking and slavery – resulting in increased disruptions, proactive identification and referral of suspected cases of modern slavery to law enforcement agencies.
- Launching the [Modern Slavery in Australia website](#), a public awareness tool available in 249 languages.
- Progressing development of guidance to support businesses to improve pathways to effective remedies for victims and provide effective remediation in instances of modern slavery.
- Developing an optional international reporting template on modern slavery, forced labour and child labour, in conjunction with Canada and the United Kingdom, to serve as a guide for responding to supply chain transparency requirements. The guidance is designed to reduce administrative burden for organisations subject to supply chain reporting requirements in the United Kingdom, Australia, and Canada; and supports the development of 1 report for all 3 jurisdictions.
- Publishing the 4th edition of the *Practice Guidelines for Organisations: Working with People in or at Risk of Modern Slavery* to promote a safe, ethical and collaborative multisectoral response to identify, support, and work with people in or at risk of modern slavery.

International

- Completing ratification of all 10 Fundamental International Labour Organization Conventions, with ratification of the *Promotional Framework for Occupational Safety and Health Convention*, 2006 (No. 187) in October 2024. Australia became the 23rd country in the world, and the first in the Asia-Pacific region, to achieve this feat.
- Co-chairing (with Indonesia) the Bali Process on People Smuggling, Trafficking in Persons and Related Transnational Crime (the Bali Process); the Bali Process Government and Business Forum (GABF); Bali Process Steering Group; and Ad Hoc Group Senior Officials' Meetings. The Bali Process is the key regional forum for policy engagement, information sharing and practical cooperation on people smuggling, human trafficking and modern slavery.
- Presenting at the 13th UN Forum on Business and Human Rights on Australia's modern slavery response, (Switzerland, November 2024), and attending the Asia and Pacific regional meetings of this Forum (Thailand, September 2024 and Fiji, October 2024).
- Presenting at the UN Office on Drugs and Crime inaugural Global Forum for Human Trafficking Survivors (Vienna, June 2025), sharing Australia's efforts in survivor empowerment and development of cross-sectoral good practice guidance for engaging with people with lived experience.
- Presenting at the 2nd Thailand Modern Slavery Conference, which showcased Thailand's continuing progress and leadership on countering modern slavery.
- Attending Joint Steering Committee meetings of Thailand's Counter Trafficking in Persons Centre of Excellence.
- Undertaking bilateral country visits to discuss modern slavery, including to Cambodia to discuss the rise of human trafficking into online scam centres.
- Hosting and co-hosting side events at forums with regional and international partners showcasing Australia's activities combating trafficking for forced criminality in online scam centres, including at the 34th Commission on Crime Prevention and Criminal Justice (Austria, May 2025).
- Continuing our longstanding flagship programs, which build regional resilience to human trafficking and modern slavery in Southeast Asia – the ASEAN-Australia Counter Trafficking Program (\$80 million 2018–2028) and Tripartite Action to Enhance the Contribution of Labour Migration to Growth and Development in ASEAN (\$24 million 2015–2025).
- Collaborating with international law enforcement partners to build capabilities and networks to respond to the human trafficking and slavery crime threat.
- Working with key partner countries in the region, such as Vietnam, Tonga, and Vanuatu, to strengthen law and justice frameworks and responses to combat human trafficking and other forms of modern slavery, including by co-delivering workshops and providing desk-based technical assistance.

Support and protect

- The Forced Marriage Specialist Support Program became operational in early 2025.
- Publishing an *Overview of state and territory victims of crime financial assistance schemes and their availability to victims and survivors of modern slavery*, which outlines the different types of financial assistance or compensation payments available, eligibility criteria and legislative requirements.

Investigation and prosecution

- Prosecutions for modern slavery offences continue through dedicated efforts from law enforcement and criminal justice agencies.
- The CDPP conducted a number of significant prosecutions for modern slavery offences, assisted by the efforts of law enforcement agencies during the period 1 July 2024 to 30 June 2025.
- 7 modern slavery prosecutions commenced during the period, and 3 matters were finalised resulting in convictions.

[Note: One offender was convicted after trial of causing a person to enter into a forced marriage, contrary to subsection 270.7B(1) of the Criminal Code. One offender was convicted after trial of organising or facilitating the exit of a person using coercion, threat or deception, contrary to subsection 271.2(1A) of the Criminal Code. The third offender was convicted on pleas of guilty of 2 offences of attempting to cause a person to enter into a forced marriage, contrary to subsections 11.1(2) and 270.7B(1) of the Criminal Code. The third offender has appealed their sentence which is yet to be determined.]

Abbreviations

AAO	Administrative Arrangements Order
ABF	Australian Border Force
ACIAR	Australian Centre for International Agricultural Research
ACQSC	Aged Care Quality and Safety Commission
ADF	Australian Defence Force
AEC	Australian Electoral Commission
AFMA	Australian Fisheries Management Authority
AFP	Australian Federal Police
AIC	Australian Institute of Criminology
AIRP	Australian Infrastructure Renewal Program
ANAO	Australian National Audit Office
APS	Australian Public Service
APSC	Australian Public Service Commission
ARC	Australian Research Council
ASA	Australian Submarine Agency
ASIC	Australian Securities and Investments Commission
ASSEA	Asbestos and Silica Safety and Eradication Agency
ASX	Australian Stock Exchange
BOM	Bureau of Meteorology
CAF	Cleaning Accountability Framework
CCA	Climate Change Authority
CCE	Corporate Commonwealth entity
CCS	Commonwealth Contracting Suite
CDPP	Office of the Director of Public Prosecutions
CMM	Contract Management Manual
Commonwealth Statement	Commonwealth Modern Slavery Statement
CPRs	Commonwealth Procurement Rules
DAFF	Department of Agriculture, Fisheries and Forestry
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DEWR	Department of Employment and Workplace Relations
DFAT	Department of Foreign Affairs and Trade

DISR	Department of Industry, Science and Resources
DPS	Department of Parliamentary Services
DoF	Department of Finance
DSS	Department of Social Services
DVA	Department of Veterans' Affairs
ESG	Environmental, Social and Governance
Fair Work Act	<i>Fair Work Act 2009 (Cth)</i>
FWI	Fair Work Inspector
ICT	Information and communications technology
IDCP	Interdepartmental Committee on Modern Slavery in Public Procurement
JLL	Jones Lang LaSalle
Modern Slavery Act	<i>Modern Slavery Act 2018 (Cth)</i>
MoU	Memorandum of Understanding
NBA	National Blood Authority
NCE	Non-corporate Commonwealth entity
NEMA	National Emergency Management Agency
NMHC	National Mental Health Commission
OFWO	Office of the Fair Work Ombudsman
OPC	Office of the Parliamentary Counsel
PALM	Pacific Australia Labour Mobility
PBO	Parliamentary Budget Office
PDCMS	Procurement and Downstream Contract Management Strategy
PGPA Act	<i>Public Governance, Performance and Accountability Act 2013 (Cth)</i>
PSR	Professional Services Review
PPE	Personal Protective Equipment
PREF	PALM Regional Engagement Forums
PSCP	Property Services Coordinated Procurement Arrangements
PSP	Property Service Providers
Public Service Act	<i>Public Service Act 1999 (Cth)</i>
RFT	Request for Tender
RTO	Registered Training Organisation
SEC Act	<i>Strengthening Employer Compliance Act 2024 (Cth)</i>
SPB	Strategic Procurement Branch

The Board Future Fund Board of Guardians

The Commissioner Australian Anti-Slavery Commissioner

The Criminal Code *Criminal Code Act 1995* (Cth)

Supplier Code Commonwealth Supplier Code of Conduct

TEQSA Tertiary Education Quality and Standards Agency

UNGPs United Nations Guiding Principles on Business and Human Rights

UQ University of Queensland

WoAG Whole of Australian Government

Glossary

Australian Government	Australian Government, also referred to as the federal government or Commonwealth government, is the national government of Australia.
Commonwealth	In this Commonwealth Statement, the Commonwealth refers to the 103 non-corporate Commonwealth entities as a collective term.
Commonwealth Statement	This sixth Commonwealth Modern Slavery Statement, published pursuant to the Modern Slavery Act, covering the period 1 July 2024 to 30 June 2025.
e-Learning modules	<p>The term, e-Learning modules, refers to the three e-Learning modules which are publicly available on the Modern Slavery Statements Register.</p> <ol style="list-style-type: none"> 1. Modern Slavery in Public Procurement 2. Identifying and Assessing Modern Slavery 3. Managing Modern Slavery Risks.
Look a Little Deeper (LALD) program	<p>The Look a Little Deeper (LALD) program was created by Police for frontline responders and is aimed at increasing awareness of human trafficking to increase detection of human trafficking cases and ensure their subsequent referral to the AFP for investigation.</p> <p>LALD is designed to answer 4 main questions:</p> <ol style="list-style-type: none"> 1. What is HT and slavery? 2. What are the indicators? 3. Where may I see indicators in my day-to-day duties? 4. What do I do if I suspect HT/slavery? <p>The program comprises e-Learning Modules and specialist resources and materials covering the different types of human trafficking and slavery offences, such as forced labour, forced marriage, and child exploitation.</p> <p>The LALD program has been adopted by 16 frontline agencies, including state and territory police and several Commonwealth agencies, which has resulted in increased capabilities across every state, territory, and Commonwealth jurisdiction, enhancing the identification of victim-survivors and facilitating earlier prevention, protection, prosecution, and disruption opportunities.</p>
Modern slavery	<p>Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include:</p> <ul style="list-style-type: none"> • human trafficking • slavery • servitude • forced labour • debt bondage • forced marriage • the worst forms of child labour. <p>Modern slavery is a term used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. These practices are also harmful and may be present in some situations of modern slavery.</p>
Modern Slavery Act 2018 (Cth)	The Modern Slavery Act entered into force on 1 January 2019. It established a national Modern Slavery Reporting Requirement.

Model modern slavery contract clauses	<p>The Australian Government has developed a suite of model modern slavery contract clauses for inclusion in government procurement contracts to ensure suppliers respond to modern slavery risks and support the Australian Government's efforts to address modern slavery in its own supply chains.</p> <p>The clauses were drafted for use with the CCS templates when applicable and are included in the Department of Finance's Commonwealth ClauseBank, a 'bank' of pre-drafted contract terms and conditions that Commonwealth agencies may use in procurements greater than \$200,000 GST inclusive.</p>
Model modern slavery tender clauses	The Australian Government has developed model modern slavery tender clauses to set out its expectations for suppliers about identification and mitigation of modern slavery risks in the delivery of goods and/or services and support the Commonwealth's compliance with the Modern Slavery Act.
Modern Slavery Statements Register	The Modern Slavery Statements Register houses modern slavery statements provided by entities reporting under the Modern Slavery Act.
Modern Slavery Toolkit	<i>Addressing Modern Slavery in Government Supply Chains: A Toolkit of resources for Government procurement officers</i>
Non-corporate Commonwealth entities	<p>Non-corporate Commonwealth entities are legally and financially part of the Commonwealth. They include Departments of State, parliamentary departments and listed entities. NCEs are established under power that comes from the Constitution, usually through legislation and the exercise of executive power.</p> <p>NCEs form part of the executive government and are accountable to the Parliament. NCEs are subject to the PGPA Act, which further clarifies the financial and corporate governance arrangements of these bodies.</p>
Public Governance, Performance and Accountability Act 2013 (Cth)	The <i>Public Governance, Performance and Accountability Act 2013</i> (Cth) establishes a coherent system of governance and accountability for public resources, with an emphasis on planning, performance and reporting.
Property Service Providers	Property Service Providers are responsible for providing core leasing services and facilities management services to NCEs and additional services as negotiated.
Reporting period	1 July 2024 to 30 June 2025
6-year reporting strategy	The Commonwealth has a planned 6-year program of work to continuously improve its response to modern slavery. The planned program of work has four phases of action across 6 years – the foundation phase, the discovery phase, the implementation phase, and the review phase.
Supplier Questionnaire	The Supplier Questionnaire is a tool within the Modern Slavery Toolkit to assist Australian Government agencies to assess their suppliers' policies and practices to identify, assess and mitigate modern slavery risks in their supply chains and operations.
Whole of Australian Government panel arrangements	WoAG panel arrangements are arrangements that are set up for Commonwealth entities to use when procuring certain goods or services. These are either coordinated or cooperative procurements, some of which are mandatory for use, and generally result in overarching contracts or standing offer arrangements.
Whole-of-government	Whole-of-government in this Commonwealth Statement is a compound adjective referring to non-corporate Commonwealth entities.

