

# **Modern Slavery Statement** for the financial year ended 30 June 2024

December 2024

## Acknowledgement of Country

The Australian Health Practitioner Regulation Agency (Ahpra) together with the National Boards, through its implementation of the National Registration and Accreditation Scheme (the National Scheme), would like to acknowledge the Traditional Custodians of the land in which we work and live on in Australia.

Ahpra recognises the unique and enduring cultures of Aboriginal and Torres Strait Islander Peoples, which are among the oldest living cultures on Earth. Ahpra understands that sovereignty was never relinquished, and it is mindful of the ongoing effects of colonisation on the health and well-being of Aboriginal and Torres Strait Islander communities. Ahpra pays its respects to the continuous link Aboriginal and Torres Strait Islander Peoples maintain with their culture, languages, and lands. Ahpra extends that respect to Elders past, present, and emerging, and to all ancestors who guide and walk beside their descendants each day.

## Introduction and identity of reporting entity

This is the third consecutive Modern Slavery Statement (Statement) issued by Ahpra (ABN 78 685 433 429), as a reporting entity pursuant to the *Modern Slavery Act 2018 (Cth) (the Act)*.

Ahpra and the National Boards' primary focus is to ensure all communities have trust and confidence in Australia's regulated health practitioners.

The purpose of this Statement is to assess, address and demonstrate Ahpra's responsibility under the Act and more importantly, to assist in the promotion and preservation of human rights. While Ahpra is confident that its business operations and supply chain do not pose a high risk of exposure or opportunities for human rights abuse, there is strong acknowledgement of its responsibility to mitigate any such risks and constantly seek to improve its contribution in this area.

## Organisational structure, operations and supply chain

### Structure

Ahpra is a statutory body governed by the Health Practitioner Regulation National Law (the National Law), which came into effect in most states and territories on 1 July 2010 and in Western Australia on 18 October 2010. This law means that registered health professions are regulated by nationally consistent legislation.

Ahpra supports the National Boards in the administration of the National Scheme across Australia. National Boards are responsible for regulating their respective health professions. The primary role of the National Boards is to protect the public and set standards and policies that all registered health practitioners must meet.

The Ahpra Board oversees the work of Ahpra. The Chair of the Ahpra Board is Gill Callister PSM. The Chief Executive Officer is Martin Fletcher.

### Operations

Ahpra works in partnership with 15 National Boards to ensure the community has access to a safe health workforce across all professions registered under the National Scheme. Public safety is always its number one priority. Every decision Ahpra makes is guided by the National Law, as in force in each state and territory.

Ahpra's operations are based in Australia, with staff based in eight state and territory Ahpra offices, as well as the national office in Melbourne.

Ahpra has five core regulatory functions:

**Professional standards:** Ahpra provides policy advice to the National Boards about registration standards, codes, and guidelines for health practitioners.

**Registration:** In partnership with the National Boards, Ahpra ensures that only health practitioners with the skills and qualifications to provide competent and ethical care are registered to practice. Ahpra also manages registration and renewal processes for local and overseas qualified health practitioners and manages student registration.

**Notifications:** Ahpra manages complaints and concerns raised about the health, performance and conduct of individual health practitioners on behalf of the National Boards, except in New South Wales and in Queensland, where Ahpra only manages those notifications that are referred. Ahpra works with health complaints entities (HCEs) to make sure the appropriate organisation deals with the community's concerns about health practitioners.

**Compliance:** Ahpra monitors and audits registered health practitioners to make sure they are complying with Board requirements.

**Accreditation:** Ahpra works with accreditation authorities and committees to ensure graduating students are suitably qualified and skilled to apply and register as a health practitioner.

Supporting the delivery of these regulatory functions are Ahpra's directorates. These are Regulatory Operations, Strategy and Policy, People and Culture, Finance and Risk and Information Technology.

## Supply chains

Ahpra has a limited supply chain, which inherently presents a minimal risk of modern slavery incidents. Ahpra also actively takes steps to prevent any violations of applicable laws within its contractual engagements with suppliers.

Ahpra's suppliers are obligated to adhere to all pertinent laws and regulations. Ahpra expects its suppliers to undertake reasonable and feasible measures to prevent the occurrence of modern slavery within their own supply chains.

Ahpra has not received any reports of slavery or human trafficking related to its suppliers. Ahpra is committed to promptly reporting any such allegations to the relevant authorities.

Ahpra collaborates closely with its service users and suppliers to guarantee the provision of superior and secure regulatory services, aligning with its National Scheme's objectives during the reporting period.

These include:

- safeguarding the public
- enhancing access to healthcare services
- promoting a skilled and adaptable health workforce.

## Risk of modern slavery practices within Ahpra's supply chains

Ahpra considers identifying and responding to any incidents of modern slavery in an appropriate and timely manner as an important responsibility. Ahpra's assessment of modern slavery risks in its operations and supply chain for this statement considered two main categories of risk: people risk and supplier risk. Ahpra's exposure to modern slavery in both these categories of risk is baselined to be low.

**People Risk:** being the risk of a reliance on migrant, seasonal or unskilled workers, or a reliance on offshore labour agencies to deliver key services.

Ahpra is an organisation that places people at the centre of its operations and has implemented strong measures to minimise the risk of modern slavery.

Throughout FY 2023/24, Ahpra has reinforced its commitment in this area by formalising its *Health, Safety and Wellbeing Management System Framework*. This framework offers clear guidance on the health, safety and wellbeing (HSW) requirements for procurement and contract management, as well as instructions regarding the use of outsourced services through consultants and/or consultative services.

Alongside the HSW Policy and Ahpra's Enterprise Agreement, these measures form the key controls necessary for maintaining a safe and healthy work environment, ensuring that employees are not exposed to the risks of modern slavery.

Further measures include:

- approval for overtime worked based on operational requirements by senior leaders and/or executive directors
- a comprehensive suite of people-focused policies that includes:
  - health and wellbeing resources to promote a healthy work-life balance
  - Respect@Ahpra policies that foster an inclusive and collaborative culture
  - clear guidelines for conflict resolution
- staff engagement surveys conducted to gauge employee satisfaction, with results and actions arising discussed by the Ahpra leaders and all people managers
- an Ahpra Code of Conduct that sets clear expectations for all employees.

**Supplier Risk:** being the potential associated (known or reported) of labour exploitation in the supply of key services.

It is unlikely that Ahpra's current and immediate supply chains have risks which meet the threshold for serious exploitation as defined by the Act. However, there is a recognition that slavery risks can be linked to indicators such as geographical locations, some goods and certain industries or sectors. Ahpra procures a range of goods and services, including IT (Information Technology) services, office supplies, and catering services. Some of these goods and services may be produced in countries where forced labour or child labour is a problem.

Ahpra has taken proactive measures to address modern slavery risks within its procurement practices. Utilising the Department of Home Affairs *Addressing Modern Slavery in Government Supply Chains* toolkit risk screening tool, Ahpra's procurement team has integrated specific modern slavery procedures into procurement practices. If any risks have been identified, Ahpra can take steps to mitigate those risks, such as by engaging with suppliers about their modern slavery policies and practices. This approach enables Ahpra staff to enhance their awareness and understanding of modern slavery risk, whilst focusing on those items within Ahpra's control or contribution.

As operational requirements change and supply chain understanding improves, modern slavery risks to Ahpra will also change. Modern slavery is a complex and dynamic issue, and the ways in which it manifests can vary depending on the industry, the country, and the specific supply chain.

Additionally, supply chains can be complex, with multiple tiers of suppliers and subcontractors. There is a risk that links to modern slavery may exist further down the supply chain, outside Ahpra's visibility and control.

## Actions to address Modern Slavery risks

Ahpra is committed to preventing and addressing the risks of modern slavery in its operations and supply chains. Ahpra has taken the following actions to mitigate these risks:

- Continued to implement Ahpra's Modern Slavery Policy to procurement practices to prevent and address modern slavery risks in Ahpra's operations and supply chains. The policy is designed to provide strong governance and ensure that Ahpra is compliant with the Modern Slavery Act.
- Operationalising modern slavery procedures within its procurement activities, placing particular emphasis on industries that are most vulnerable to modern slavery risks.

This procedure mandates that the procurement team assess both the overall risk profile of the procurement process and the specific risk profile of potential suppliers regarding modern slavery compliance. This needs to be done prior to engaging with a supplier or renewing any existing contracts.

The additional due diligence on screening suppliers considers the following factors:

- geographic locations
- sector
- product or service offering
- existing governance and oversight arrangements
- monitoring and reviewing the effectiveness of the actions; by reporting and disclosing outcomes of the risk analysis and the on-going management process.

With respect to actions addressing people risk, Ahpra employs key controls to ensure ethical recruitment, appropriate working hours, and fair compensation. These controls include:

- role descriptors and advertisement templates to provide clarity and transparency in job postings
- recruitment training and an interview guide to promote equitable hiring practices
- adherence to the Enterprise Agreement and Fair Work Statement, ensuring compliance with citizenship and work eligibility requirements for non-Australian workers, as well as monitoring changes in worker rights by management
- compliance with legal age requirements under the Fair Work Act and adherence to specific selection criteria that outline necessary experience
- implementation of necessary checks, such as criminal history and reference checks, to maintain integrity in the recruitment process
- assurance of proper remuneration and leave entitlements through the Payroll Guideline, Enterprise Agreement, Fair Work Statement, and Flexible Work Arrangements Policy.

These measures collectively reflect Ahpra's commitment to responsible employment practices and the minimisation of modern slavery risks within its operations.

Ahpra also has a public interest disclosure (whistle-blower) process, that enables any person to speak up and report concerns about possible improper conduct or corruption (including issues relating to modern slavery) engaged in by Ahpra personnel. This process ensures that Ahpra maintains its independence and integrity.

Ahpra will continue to monitor and review its modern slavery risks and actions on an ongoing basis, and report on its progress annually in accordance with the Act. Ahpra is committed to working collaboratively with its suppliers and stakeholders, to prevent modern slavery practices in its supply chain and operations.

## Assessing the effectiveness of Ahpra's actions

Ahpra's actions to assess and address modern slavery risks are evaluated in several ways, as part of an overall continuous improvement approach.

- **Monitoring the implementation of its modern slavery policy and procedure:** Ahpra has been tracking the progress of its user group and ensure that its policy and procedure are being implemented effectively with feedback sought from relevant stakeholders.
- **Tracking supplier engagement:** Ahpra can also track the progress of its engagement with suppliers that may be of risk, to ensure that they are taking steps to mitigate any potential modern slavery risks.

- **Reviewing grievance reports:** Ahpra reviews all grievance reports (including any whistle-blower reports) received through its grievance mechanism, to identify any emerging trends or areas of concern.

Ahpra will continue to adapt and strengthen these assessment measures over future reporting periods and will consider other qualitative measures going forward, to allow continual improvements in its approach to addressing modern slavery.

## Looking forward

Ahpra remains dedicated to preventing and addressing potential modern slavery within its operations and supply chains. Significant improvements have been made, including the development of clearer guidelines for identifying and mitigating risks across both supply chains and employee practices.

In the upcoming reporting period, Ahpra will monitor risk and maintain its focus on reviewing and refining key policies, such as the Modern Slavery Policy, Supplier Code of Conduct and supporting procedures, to ensure they align with best practice.

Additionally, ongoing training and support will be prioritised, ensuring that all staff are well-informed about modern slavery risks relevant to their roles. These initiatives will further strengthen Ahpra's commitment to ethical practices and continuous improvement in safeguarding against modern slavery.

Ahpra works in partnership with 15 National Health Profession Boards during development of the statement but neither owns nor controls other entities.

This statement was approved by the Ahpra Board on 10 December 2024



Gill Callister PSM

Chair, Ahpra Board

Date: 10 December 2024