



2024/25

# Modern Slavery Statement



Royal Flying Doctor Service  
QUEENSLAND SECTION

# About the Royal Flying Doctor Service

From our humble beginnings in the small outback town of Cloncurry, the Royal Flying Doctor Service (Queensland Section) (RFDS) has grown into an essential healthcare provider for regional, rural and remote communities across the state.

Founded in 1928 with a vision to bring accessible healthcare to isolated communities, the RFDS established Australia's first air ambulance service. With the support of Alfred Traeger's pedal radio, the organisation was able to deliver on-demand healthcare, with real-time communication. This innovation assisted greatly when trying to reach remote communities, overcoming the challenge of distance and isolation. The RFDS transformed the landscape of healthcare access in Australia, ensuring that support is available to everyone, no matter where they live, work or travel.

Nearly 100 years on, the RFDS (Queensland Section) has expanded its services beyond aeromedical retrievals to include inter-facility transfers, primary health care clinics, mental health consultations, telehealth, and oral health services.

Today, the RFDS (Queensland Section) operates from nine bases—Brisbane, Bundaberg, Cairns, Charleville, Longreach, Mount Isa, Rockhampton, Roma, and Townsville - creating a strategic network that ensures the finest care reaches every corner of Queensland.

As we continue to grow, we remain dedicated to enhancing our services and meeting the evolving needs of the communities we serve.

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## Our cover artist

On the cover and throughout the pages of the Modern Slavery Statement are elements of Wudarabin Snider's artwork titled, *Lores*.

The teen artist previously created the winning design in an Indigenous Creative Art Competition, with her artwork also featuring on the cover of the 2020/21 RFDS (Queensland Section) Financial Report and Annual Report. When designing her most recent artwork for the RFDS (Queensland Section), Wudarabin focused on the values, or lores, of the RFDS.



Wudarabin explained:

The firesticks represent mutual care and respect. Our people would make a fire to show their respect when passing through neighbouring clans' territory and for smoking ceremonies to show care for their wellbeing.

The large shields represent the theme safety and quality as the shields were used by our people for protection. They were quality shields to provide safety.

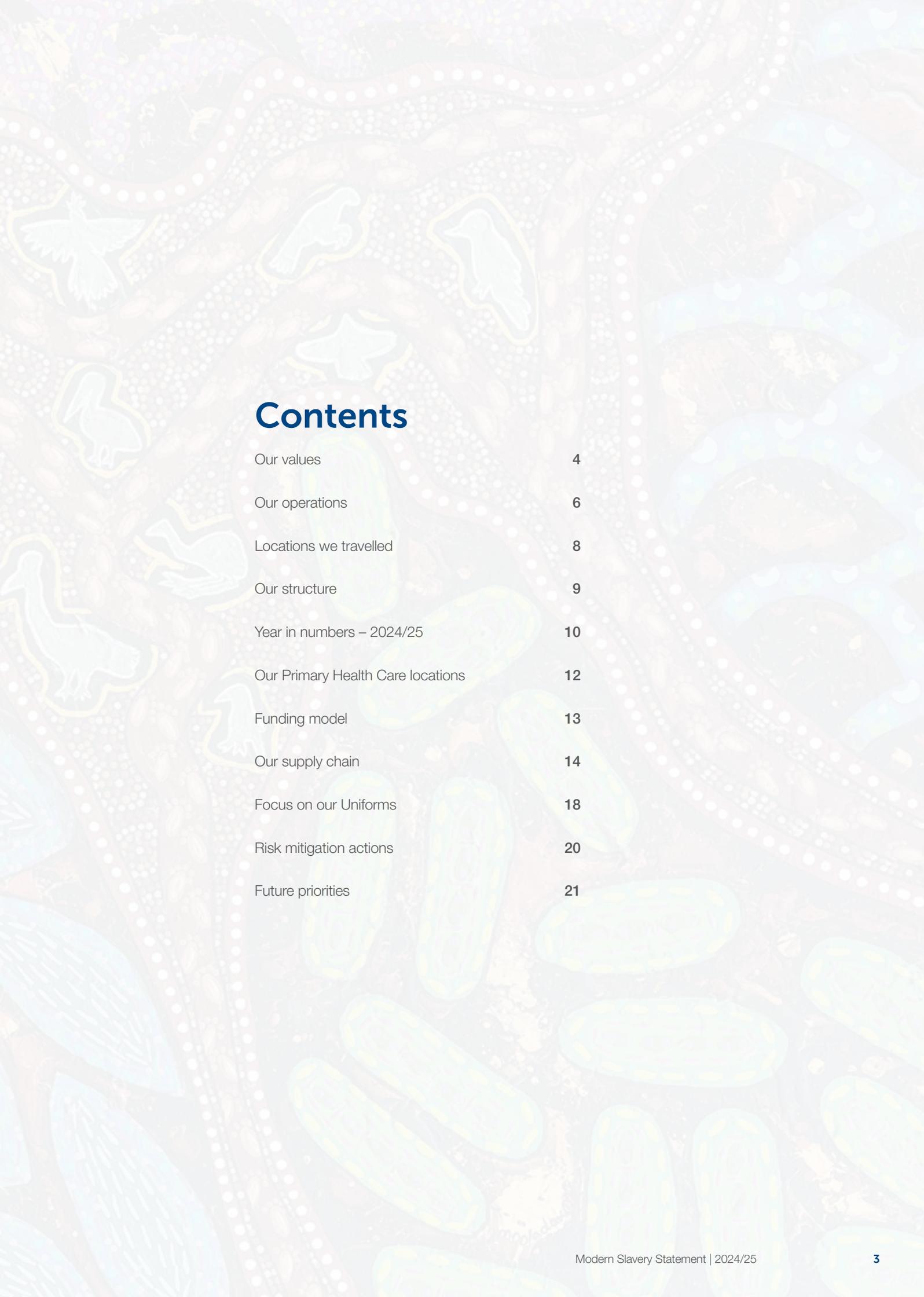
The clapsticks were used around the fire to sing songs, and share stories, as a community together, in a collaborative environment.

The huts symbolise the safety and shelter we had in an open and transparent environment.

The boomerangs represent the value of commercially astute, as a person has to be very sharp and clear to be able to throw a boomerang and make it return.

The birds represent the pilots, doctors, and nurses, being proud and passionate as they fly high in the sky like the planes.

There is also surrounding Bama (Aboriginal) dot art, which shows my pride and passion in my culture, especially the white dots which represent my bubu (country) Laura and the ancient cave art.



# Contents

Our values	4
Our operations	6
Locations we travelled	8
Our structure	9
Year in numbers – 2024/25	10
Our Primary Health Care locations	12
Funding model	13
Our supply chain	14
Focus on our Uniforms	18
Risk mitigation actions	20
Future priorities	21

# Our values



## Safety and quality

At all times, with a patient-centred focus



## Mutual care and respect

For patients, supporters, stakeholders and each other



## Commercially astute

Agile and forward-thinking, to lead the RFDS into the future



**Open and transparent**

In all our dealings



**Collaborative**

Encouraging and empowering of each other



**Proud and passionate**

In all that we do

## Our operations

Our ability to access some of the most remote parts of the country over the past 96 years places us in a privileged position of trust within rural and remote communities. With our background in aeromedical retrieval, we have grown to be one of the largest providers of primary health care services in the country. We actively collaborate with other like-minded healthcare partners such as Primary Health Networks, Hospital and Health Services and Aboriginal Community Controlled Health Organisations, to support and promote multidisciplinary, team-based care for the people of regional, rural and remote Queensland. We are committed and engaged in clinical design and innovation tailored for Queensland's rural and remote populations.

We employ some of the most highly qualified pilots, medical officers, nurses and mental health professionals in the country. We have a robust system of employment policies and procedures design to protect our employee's human rights, and to ensure compliance with Australian industrial relations laws.

RFDS (Queensland Section) is committed to taking all reasonably practicable steps to eliminate hazards and reduce risks associated

with our operations, and for health and safety to be the overriding consideration at all times. We ensure appropriate resources are available to continuously and effectively monitor and manage health and safety related risks in our operations. This includes resources for continuous improvement of our Quality Management System and Safety Management System, and the appointment of adequate numbers of appropriately trained quality and safety personnel.



## **Aeromedical Services**

Our aeromedical operations include both primary retrievals and inter-hospital patient transfers across Queensland. Working with Retrieval Services Queensland and alongside other service providers, we provide access to emergency and specialist care for more than 13,000 patients each year.

## **PHC Clinics**

Comprehensive full and half day clinics are regularly conducted throughout rural and remote Queensland. With around 25,000 patients seen annually, our GP and nurse clinics include a range of additional services including skin and hearing checks. Our highly qualified GPs and primary health care nurses are enabling clinical leadership and patient centered care, specifically tailored for Queensland's rural and remote population.

## **Child and Maternal Health**

All of our primary health care nurses are trained midwives, and alongside our medical officers, offer a comprehensive Child and Maternal Health service to expecting and new mothers across Queensland.

## **Health Promotion**

RFDS Field Days are conducted at cattle stations and events across Queensland every year, tailored specifically around individual community needs. Held in conjunction with our GP and nurse clinics, the Field Days provide a true social experience with a health promotion focus, covering areas such as first aid, diet and nutrition, mental health and exercise.

## **Mental Health**

Our dedicated mental health clinicians deliver comprehensive services to people suffering mental health issues. Working closely with local GPs under a Stepped Care approach, our clinicians provide a full range of interventions, from low intensity, through to the more severe and complex disorders. Our mental health program delivers over 12,000 occasions of care annually, predominantly across the far north and central western regions of Queensland.

## **Telehealth**

Our medical officers located in Mount Isa, Cairns and Charleville offer a 24-hour medical consultation service to people living, working or travelling in remote and rural Queensland.

Our telehealth service includes after hours and weekend consultations times as well as the use of videoconferencing technology from our Cairns Base to people living in northern parts of the state. We conduct around 19,000 remote consultation calls a year.

## **Medical Chests**

We provide more than 1,300 medical chests to remote communities (cattle stations, mining sites, offshore enterprises) across the state and into the Northern Territory. The contents of the chests are prescribed remotely by RFDS medical officers, with the support of a 24/7 aeromedical emergency and telehealth service.

## **RFDS Dental Service**

Our custom built, mobile dental surgery travels to remote communities with more than 2,300 patients seen annually. This Commonwealth funded service provides X-rays and extractions, treatment for acute or pre-existing conditions, treatments for gum disease and referrals to specialist dental services.

## **Immunisations**

RFDS provide a range of vaccinations, including yearly flu vaccines, Q fever, and the recommended national immunisation program for children and adults. Last year we administered more than 2,100 immunisations.

## **RescueSwag**

Rescue Swag - an RFDS first aid kit designed in Far North Queensland for people living in the outback - is ensuring the Flying Doctor continues keeping people safe no matter where they live, work, or travel.

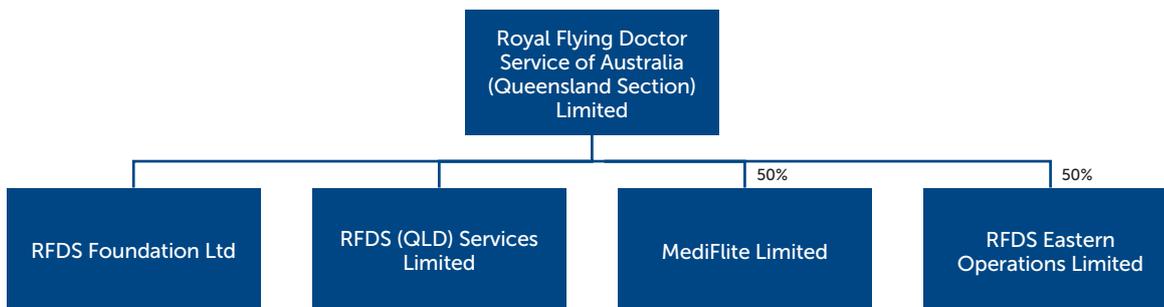


# Our structure

RFDS (Queensland Section) is proudly an Australian charity. Governed by a skills-based Board of Directors with a strong connection to rural and remote Queensland, more than half of our members currently live in rural Queensland, with several representatives also being current or former rural GPs.

Our activities are presently undertaken through five companies:

- 1. Royal Flying Doctor Service of Australia (Queensland Section) Limited** – our main operating entity, and a registered charity, providing aeromedical and other health care services across Queensland.
- 2. RFDS Foundation Ltd** – a registered charity designed to encourage social venture capital investment and greater long term philanthropic support for the RFDS in perpetuity.
- 3. RFDS (QLD) Services Limited** – a health promotion charity responsible for our dental programs, headspace services and RescueSwag. This company also provides aircraft maintenance and engineering services to our fleet pursuant to a Part 145 Air Operators Certificate.
- 4. MediFlite Limited** – this company was established jointly with LifeFlight Australia to provide additional aeromedical services into regional Queensland.
- 5. RFDS Eastern Operations Limited** – was established jointly with Royal Flying Doctor Service of Australia (South Eastern Section) to pursue health service projects for residents in rural, regional and remote Qld, NSW and ACT who are in need of benevolent relief.



## Year in numbers — 2024/25

The RFDS continues to provide vital emergency medical and primary health care services to regional, rural and remote communities across Queensland.



MORE THAN **200**  
occasions of care  
across Queensland  
each day



MORE THAN **2,100**  
immunisations  
administered



MORE THAN **12,000**  
consultations conducted by  
headspace Cairns and RFDS  
mental health clinicians



MORE THAN **1,300**  
medical chests in rural  
and remote locations  
throughout Queensland



MORE THAN **13,000**  
patients transferred  
via aeromedical service



MORE THAN **24,700**  
consultations were  
conducted at RFDS  
GP and nurse clinics  
in Queensland



MORE THAN **18,000**  
remote consultation  
calls through our  
telehealth service



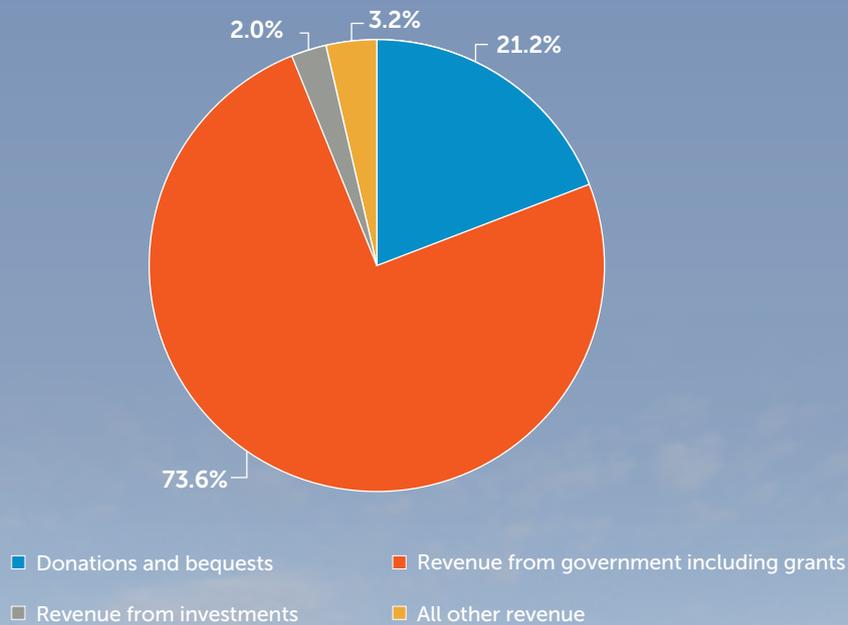
MORE THAN **2,300**  
consultations by our  
RFDS Dental Service

# Primary Health Care locations



# Funding model

RFDS (Queensland Section) receives Commonwealth Government and State Government funding to operate its services. We also rely on bequests, fundraising, donations, and partnerships to support operational costs and fund capital campaigns including the replacement of aircraft, the back-of-cabin fit-out, investment in infrastructure at bases, the purchase of medical equipment, and other major capital investments.



## Our supply chain

RFDS (Queensland Section) annually engages with approximately 960 contractors, service providers and suppliers to deliver our aeromedical and primary health care services to rural and remote Queensland. These various providers represent Tier 1 of our extended global supply chain.

Our Tier 1 providers are predominately Australian owned, operated or based. The majority, by number, are based in regional areas of Queensland. Whilst twenty-nine of our suppliers are from overseas, each is located in countries with robust employment and industrial relations laws and a low risk of human rights abuses.

Country	Number of Tier 1 suppliers	Approximate % of FY24 spend <sup>2</sup>
Australia	919	66.5%
United States	27	33.04%
China	15	0.15%
Canada	4	0.22%
Singapore	1	0.03%
New Zealand	1	0.015%
India	1	0.01%
Sweden	1	0.03%

Where contractors are used in our operations, such persons are typically highly qualified, ranging from professional advisors through to specialist engineers, pilots and medical professionals. We also engage a variety of professional trades, including electricians, plumbers and gardeners to help us maintain our bases, offices, clinics and residential properties. Typically, these trades are small family owned and operated rural businesses.

In the areas of commercial cleaning and security, sectors where subcontracting is rife and the risks associated with indirect employment and use of vulnerable populations is considered high, our modern slavery risk is low. In many cases security guards and cleaners require special clearance to work on our airport bases, and due to the 24/7 nature of our operations, they are visible and known to our night shift personnel. Around the state, we engage several small contract cleaners and security guards that are regionally based family-owned operations. Our largest provider of security services has made public commitments regarding the proactive steps they are taking to address modern slavery risks in their business.

From a labour rights standards perspective, we consider that there is a low risk of modern slavery within our own operations or our Tier 1 supply chain.

<sup>2</sup> Based on our 2022 analysis of suppliers. There was no material change in suppliers in FY25.

We recognise that our Tier 1 suppliers have their own complex and diverse supply chains for the products and goods supplied to us (and the raw materials used to create those goods) and these supply chains extend beyond Australia's borders. It is this extended supply chain that has been identified as a risk area for potential human rights abuses.

Because of the number and variety of services and products required to deliver aeromedical and primary health care services across the state, we group the multitude of products and services used in our activities into 21 categories. These categories have been assessed for potential modern slavery risks having regard to the specific service, product, raw material, supplier, and country of origin/manufacture.

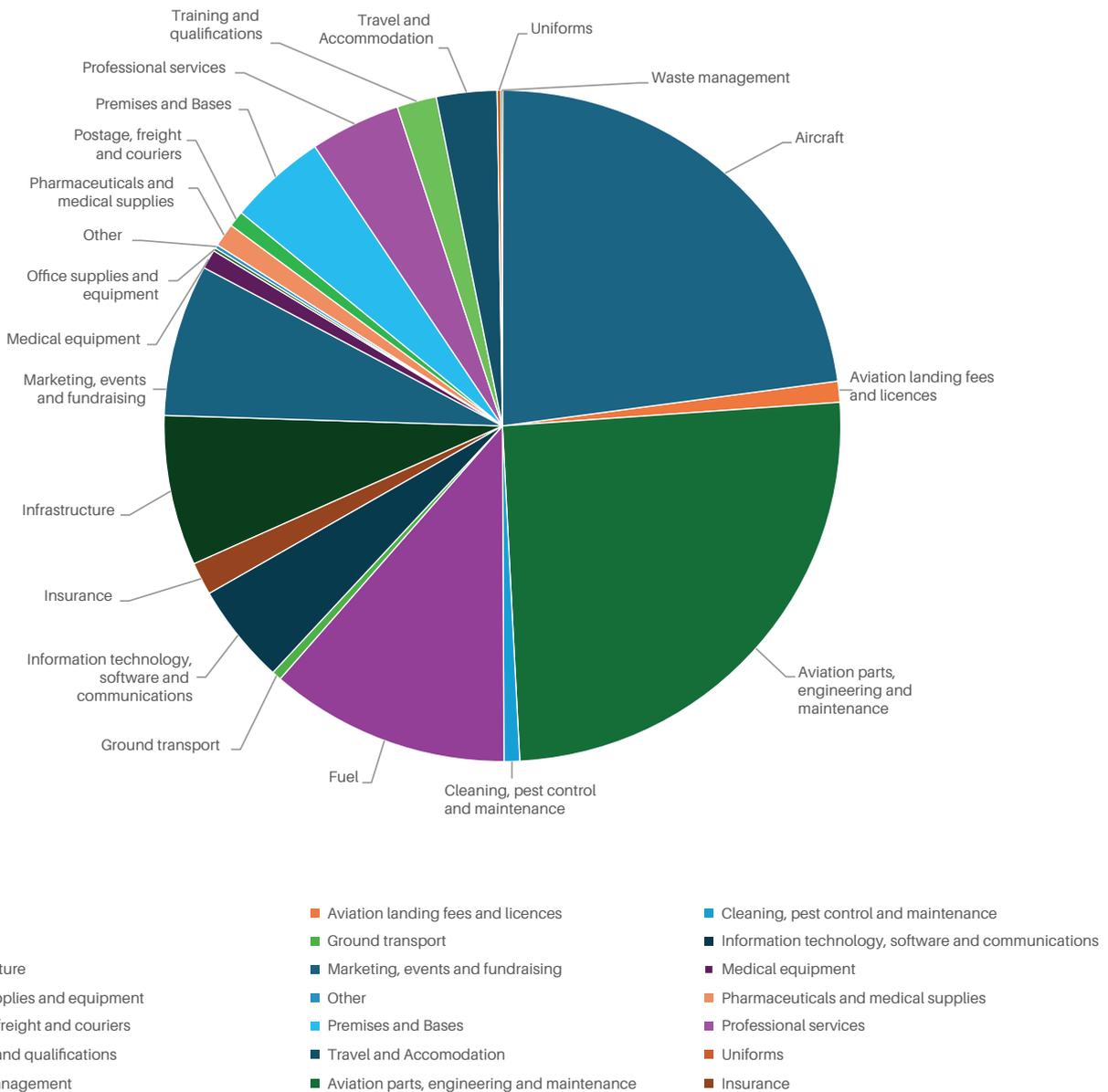


Table based on analysis of 2022 expenses. There was no material change in expense trends in FY25.

Our risk assessment indicates that there is a low risk of modern slavery within our operations and Tier 1 supply chain:

- RFDS (Queensland Section) employees are all based in Australia and protected by Australia's industrial relations system;
- All our employees are skilled professionals in their chosen career or field of expertise;
- Where we use contractors, they are typically skill professional advisors, engineers, pilots and medical professionals or qualified trades such as electricians and plumbers;
- the majority of our Tier 1 providers are Australian owned and operated, or have dedicated operations based in Australia. The major foreign companies we deal with are all based in jurisdictions with a low risk of human rights abuses;
- RFDS (Queensland Section) does not manufacture any products overseas, or directly procure goods and products from any suppliers located in high-risk countries for modern slavery;
- half of our top 20 suppliers have made public commitments to combat modern slavery within their own supply chains;
- a large proportion of our suppliers are small family owned and operated businesses located in regional Queensland.

Our risk assessment included an analysis of the steps being taken by our providers to combat modern slavery within their own supply chains (our downstream supply chains). Our most recent analysis indicated that, collectively, Tier 1 providers representing at least 60% of our annual spend have filed modern slavery statements in Australia or issued similar statements and commitments pursuant to the reporting requirements of another jurisdiction.

Whilst our risk assessment determined that the overall risk of modern slavery within our supply chain was low, we recognise that the expanded nature of global supply chains creates the potential for hidden risks of unacceptable practices occurring in certain areas.



## Focus on fuel

The complexity of the global supply chain for aviation fuel introduces the possibility of multiple ethical risk points, including exposure to forced labour and exploitative practices.

Aviation fuel represents a significant operational expense for RFDS (Queensland Section), accounting for approximately 11% of total expenditure in FY24. Given the critical strategic importance of aircraft fuel—and the complex global supply chains that underpin it—RFDS has undertaken an assessment of the ethical integrity of its fuel sourcing practices.

The oil and petroleum industry is inherently global and geographically dispersed. Crude oil extraction and refining often occur in regions with elevated governance and human rights risks. Once extracted, crude oil and petroleum products may pass through multiple intermediaries and modes of transport—road, rail, and sea—before reaching consumers in Australia. This layered supply chain introduces potential vulnerabilities, particularly in the early stages of extraction and production.

One of the most pressing concerns in upstream oil extraction is the potential reliance on foreign migrant labour, often employed in temporary or subcontracted roles. These workers may be deployed to remote offshore platforms or isolated refinery sites where oversight is limited. In such environments, indicators of forced labour can emerge, including restricted movement, excessive working hours, withheld wages, and confiscation of identity documents. Additional risks include unsafe working conditions, exposure to extreme heat, limited access to legal protections and medical care, and barriers to reporting abuse.

RFDS (Queensland Section) sources its aviation fuel through a domestic Australian company (“Direct Supplier”) that procures crude oil and refined products from both its own operations and large global suppliers. The production and refining of aviation fuel is a technically demanding process, requiring specialised infrastructure, rigorous quality assurance, and a highly skilled workforce. Our Direct Supplier possesses the capability to refine fuel domestically and distribute it nationwide. Once crude oil and petroleum products arrive in Australia, the domestic processing significantly reduces the risk of modern slavery and human rights violations.

As a reporting entity under the Australian Modern Slavery Act, our Direct Supplier has demonstrated a robust commitment to ethical sourcing. The company has implemented a comprehensive governance framework, including a Modern Slavery Policy, Responsible Sourcing Policy, and Supplier Code of Conduct. It has established a Modern Slavery Committee, conducts regular risk assessments, and provides training to employees and contractors. Notably, it leverages the Sedex data platform to assess supplier risk and access ethical trade audits, enhancing its due diligence capabilities.

The Direct Supplier's upstream partners—our Tier Two suppliers—include some of the world's largest integrated oil and gas companies. These entities operate across the full value chain, from extraction and refining to global trading and retailing. Many are also subject to the UK's Modern Slavery Act and have adopted multi-layered strategies to address modern slavery risks. Their approaches are grounded in international frameworks such as the UN Guiding Principles on Business and Human Rights, the International Labour Organization's core conventions, and the Maritime Labour Convention.

Whilst the oil and fuel industry is in many respects a complex and high-risk environment, our Tier One and Tier Two suppliers are actively taking steps to identify, mitigate, and respond to modern slavery risks in their supply chains. These efforts are supported by formal policies, structured due diligence processes, and transparent reporting mechanisms under UK and Australian modern slavery laws.

Based on our review, RFDS (Queensland Section) believes that our suppliers have appropriate systems in place to monitor their supply chains, educate their workforces and partners, safeguard worker rights, and uphold their commitments to preventing modern slavery and human rights abuses. These measures provide us with a satisfactory level of assurance that the modern slavery risks associated with our aviation fuel supply chain are being actively and effectively managed.

# Risk mitigation actions

We have undertaken a number of system improvements and implemented control measures to mitigate the risk of modern slavery within our operations and supply chains.

RFDS (Queensland Section) has a robust governance framework. To strengthen this framework, we have adopted a Modern Slavery Policy which sets out our commitment to ensuring modern slavery does not occur in our operations or supply chain:

- We reject any form of modern slavery such as slavery, servitude, human trafficking and forced labour.
- We respect the human rights of our employees, patients, and the community as whole, as well as the employees of our suppliers and business partners.
- We aim to identify and manage risks related to human rights across our business and in our supply chain.

Our Code of Conduct sets out the Board's clear expectations regarding the rejection of modern slavery within all aspects of our operations.

Our Grievance and Complaints Handling Policy specifically addresses the confidential reporting of suspected human rights abuses.

Our employees already receive regular training on internal processes and procedures, health and safety, as well as changes to regulation and developments in our industry, together with a wide range of professional development and specialist training programs. We are continuing our program of training for staff in modern slavery risks through a dedicated training module.

Our Procurement Policies and supplier due diligence processes address risks and concerns regarding modern slavery. Our supplier audit, evaluation and risk assessment criteria also takes into account such concerns. Where we identify a supplier or contractor is potentially supplying at risk products and services, they will be required to complete the detailed due diligence questionnaire.

We have implemented a set of model clauses that are used in our contracting process to impose legal obligations on our suppliers to manage modern slavery risks within their organisation and our mutual downstream supply chains.

We have introduced a Supplier Code and standard terms contract to specifically address our expectations regarding, among other things, the elimination of modern slavery risks within our supply chain.

Our Supplier Code imposes obligations on suppliers and contractors to:

- make all reasonable efforts to ensure that their business, and the businesses within their supply chain, are not engaged in, or complicit with, human rights abuses;
- not use any form of modern slavery practice (including forced or involuntary labour, child labour, human trafficking, debt bondage or deceptive recruitment);
- comply with all applicable Australian and international laws relating to modern slavery, the exploitation or deprivation of liberty of workers, and the employment of children;
- respect every worker's workplace rights and entitlements and ensure compliance with all relevant workplace laws, regulations and instruments. This includes properly paying employees, giving them their entitlements, not discriminating unlawfully and committing to workplaces free of harassment.

## We are committed to improving our approach to the elimination of modern slavery risks within our supply chain.

We have updated our contract management processes to implement new risk controls to ensure that the provision of goods and services to RFDS meet our requirements, are timely, ethical, compliant and represent good value for money. When dealing with suppliers, the contract management process prompts our staff to observe the following:

- If RFDS receive abnormally low pricing, ask the supplier why they can provide the goods and services at that cost.
- Question suppliers on what measures they have in place to identify modern slavery risks in their own supply chain.
- Question suppliers if they make use of migrant labour or tightly control worker activities such as transport, accommodation, and communication.

Our contract management planning processes also include specific risk assessments for modern slavery concerns.

We will continue to look for ways to enhance and improve our procurement and supplier selection processes. This includes undertaking assessments of potentially at-risk areas within our supply chains, to better map and understand the source of the goods we use in the delivery of our services to rural and remote Australia.

### Authorisation

This statement was prepared in consultation with members of the executive leadership team, and approved by the Board of Royal Flying Doctor Service of Australia (Queensland Section) Limited in their capacity as the principal governing body for RFDS (Queensland Section).



**Ms Georgie Somerset AM**  
Chair  
RFDS (Queensland Section)







Royal Flying Doctor Service  
QUEENSLAND SECTION

The furthest corner. The finest care.

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