



Australian Government  

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Comcare

# Comcare Modern Slavery Statement 2024-2025



# Contents

<b>A message from our CEO</b>	<b>1</b>
<b>About Comcare</b>	<b>1</b>
<b>Comcare’s investments</b>	<b>2</b>
<b>Comcare’s supply chain</b>	<b>2</b>
<b>Comcare’s spend categories</b>	<b>3</b>
<b>Types of supply chains</b>	<b>4</b>
<b>Control of supply chains</b>	<b>4</b>
<b>Disclosures</b>	<b>5</b>
<b>Our management of modern slavery risk</b>	<b>5</b>
<b>Comcare’s modern slavery risk approach and assessment</b>	<b>5</b>
<b>Comcare’s modern slavery risk actions</b>	<b>6</b>
<b>Assessing for effectiveness</b>	<b>6</b>
<b>Annexure: Modern Slavery Act reporting requirement</b>	<b>7</b>



# A message from our CEO

This Modern Slavery Statement (the Statement) is made by Comcare under section 13 of the *Modern Slavery Act 2018* (Cth) (the Act) and covers the reporting period 1 July 2024 to 30 June 2025.

The Statement outlines our approach to understanding, identifying and addressing the risk of modern slavery in our operations and supply chain. It has been prepared in consultation with Comcare's senior executives and subject matter experts.

We are committed to the intent of the Act and to identifying and addressing the risks and impacts of modern slavery in our operations and supply chains. We are a value-led organisation, committed to responsible and sustainable business practices. We recognise our role in respecting and promoting the fundamental human rights of our employees, suppliers and stakeholders. We will endeavor to continue to work with suppliers who reflect our commitment.

I have approved the Statement as Comcare's CEO, accountable authority, and principal governing body of Comcare.



Colin Radford  
Chief Executive Officer

## About Comcare

Comcare is a corporate Commonwealth entity established under the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act). As a work health and safety regulator, scheme administrator and an insurer and claims manager, our purpose is to promote and enable safe and healthy work.

As the workers' compensation authority, our responsibilities include administration of the Commonwealth's workers' compensation scheme under the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act). As of 30 June 2025, this scheme covered 491,781 full-time equivalent (FTE) employees, which incorporates:

- employees of Australian Government agencies and authorities
- employees of some corporations which hold a license granted by the Safety Rehabilitation and Compensation Commission (SRCC)
- employees of private companies with majority Commonwealth ownership
- members of the Australian Defence Force while not a war (including reservists and cadets).

We also cover 459,841 FTE employees under the federal *Work Health and Safety Act 2011* (WHS Act), of whom were:

- employees of Australian Government agencies and authorities
- employees of corporations and Commonwealth authorities which hold a license grant by the SRCC (including ACT Government).

Additionally, we manage claims in relation to the *Asbestos-related Claims (Management of Commonwealth Liabilities) Act 2005* (ARC Act) and the *Parliamentary Injury Compensation Scheme Instrument 2016*.

We provide expert advice and services to the SRCC and the Seafarers' Safety, Rehabilitation and Compensation Authority (Seacare), however, we do not control or own any other entities.

As of 30 June 2025, we employed 731 ongoing employees and 48 non-ongoing employees under the *Public Service Act 1999*. These employees are based in Comcare's various offices across Australia – in Canberra, Sydney, Newcastle, Melbourne, Adelaide, Brisbane, Perth, Darwin and Launceston.

# Comcare's investments

Our financial investments are primarily made to meet current year obligations to make compensation claim payments, to fund our operating expenses and to meet future claims liabilities. The objectives are to have funds available to meet payments as and when they fall due, and to minimise the variability in funding ratio and annual premiums as a result of interest rate movements.

The financial institutions which hold our funds are currently all Australian banks, and investments held are all term deposits. Banks in Australia are highly regulated and we only invest in low risk, high quality investments. We invest according to our Credit Risk Framework Guidelines, including ensuring investments are made with institutions classified by the Australian Prudential Regulation Authority as an Authorised Deposit-Taking Institution or which are a Commonwealth, State or Territory of Australia.

We conduct an annual assessment of investment institutions ensuring all have made a commitment toward managing modern slavery risk by publishing their own Modern Slavery Statement.

# Comcare's supply chain

We procure goods and services in accordance with the requirements of the Commonwealth Procurement Rules (CPRs). The CPRs are issued by the Minister for Finance (Finance Minister) under section 105B(1) of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act).

Comcare is a prescribed corporate Commonwealth entity listed in section 30 of the *Public Governance, Performance and Accountability Rule 2014*, and as such we must comply with the CPRs when undertaking any procurement.

In accordance with the requirements of the CPRs, we primarily use external contractual arrangements for the procurement of its goods and services. This includes leveraging the Commonwealth Contracting Suite, Digital Transformation Agency's Marketplaces, other government agency panels and contractual arrangements through coordinated procurements.

We also manage our own limited tender procurements, both through approaches to market, and through credit cards for purchases of low value.

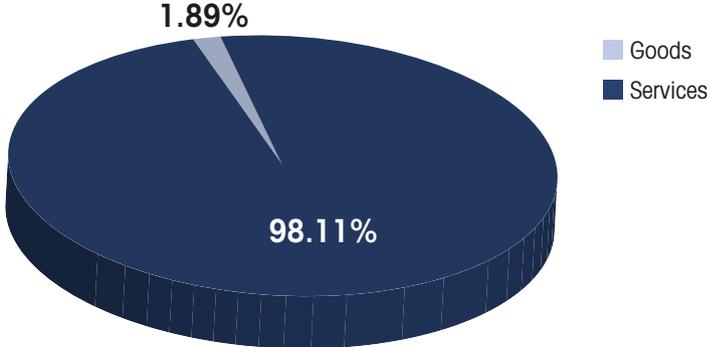




# Comcare's spend categories

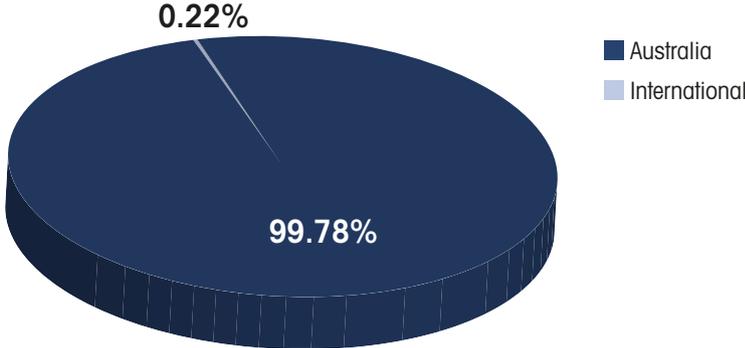
We primarily spend on goods (1.89%) and services (98.11%).

## Comcare goods and services



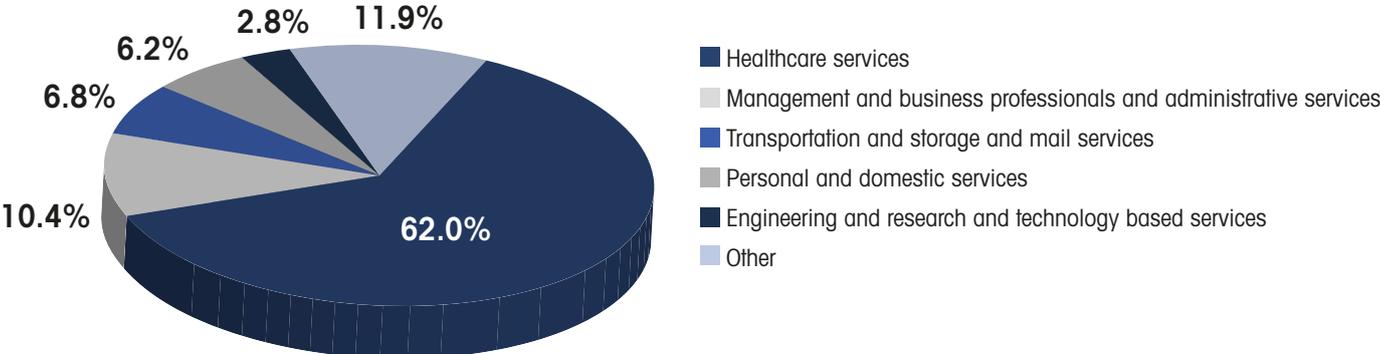
We primarily procure goods and services from, or make payments to, Australian suppliers (99.78%). Of our total spend, 0.22% related to software and healthcare services, being procured from overseas suppliers.

## Location of Comcare suppliers



The below graph shows our top 5 category types for goods and services expenses in the 2024–25 reporting period.

## Top 5 categories for Comcare goods and services in 2024–25



# Types of supply chains

Our supply chains include a mix of outsourced arrangements in relation to core information technology (IT) infrastructure, together with relatively simple supply chains for services and products required for day-to-day operations from a number of Australian based suppliers. The table below sets out the types of products and services we pay for or procure.

Procurement categories	Products and services
Healthcare services	Claims management, medical assessment, rehabilitation, mental health care support services, and drugs and pharmaceuticals for the prevention of treatment of disease.
Management and business professionals and administrative services	Professional services, including application development, project management, short-term specialist service replacement, and advisory and legal services.
Transportation and storage and mail services	Services associated with cargo and personal transportation, including file archive storage, mail and courier services.
Personal and domestic services	Services associated with personal care and assistance, such as domestic service and day and elderly care providers as well as hairdressers, manicurists, and pedicurists.
Engineering and research and Technology based services	Application development services, ICT managed services, ICT security services, infrastructure support and hardware

# Control of supply chains

Our supply chains are controlled with robust contracting arrangements as defined by the CPRs and our Contract Management Framework, which provides guidance on the contract management process as well as tools and templates to assist Contract Managers effectively manage contracts. The Comcare Contract Management Guide provides a clear, standardised approach to managing and administering contracts for goods and services purchased from suppliers. The main objective of contract management is to ensure commitments and obligations from buyers and suppliers are effectively met by delivering value for money outcomes and managing risk.

Suppliers to Comcare are required to comply with any laws, statutes, regulations, by-laws, ordinances or subordinate legislation in force from time to time, including in particular but not limited to the:

- *Modern Slavery Act 2018*
- *Crimes Act 1914*
- *Criminal Code Act 1995*
- *Australian Human Rights Commission Act 1986*
- *Disability Discrimination Act 1992*
- *Racial Discrimination Act 1975*
- *Sex Discrimination Act 1984*
- *Age Discrimination Act 2004*
- *Fair Work Act 2009*
- *Workplace Gender Equality Act 2012*
- *Work Health and Safety Act 2011 or similar state and territory legislation*
- *Superannuation Guarantee (Administration) Act 1992*
- *Superannuation Guarantee Charge Act 1992*
- *Paid Parental Leave Act 2010*
- *Competition and Consumer Act 2010*
- *Environment Protection and Biodiversity Conservation Act 1999*
- *Taxation Legislation*
- *Privacy Act 1988*
- *Auditor-General Act 1997*
- *Public Governance, Performance and Accountability Act 2013*

# Disclosures

All contracts valued at or above the relevant reporting threshold value of AUD\$400,000 (GST inclusive) are reported by us on [AusTender's](http://www.fenders.gov.au) website, [www.fenders.gov.au](http://www.fenders.gov.au). Our contracts valued at or above AUD\$100,000 (GST inclusive) are published on the Comcare website biannually.

## Our management of modern slavery risk

Our Corporate Governance Framework supports decision making using the principles of stewardship, alignment, collaboration, flexibility, consistency and transparency. Our Governance Committee is charged with monitoring the ongoing administration of our modern slavery reporting, ensuring there is clear purpose, responsibilities and accountability for the management of modern slavery risk within our organisation.

We adhere to practices which promote ethical and legally compliant business. Our policies and frameworks contribute to our commitment to prevent violations of human rights such as modern forms of slavery in our business including those that relate to the Comcare and APS Values, the APS Code of Conduct, diversity and inclusion, performance management, training and capability development, as well as our risk management and assurance frameworks.

We have risk mitigation and robust procurement processes in place, including establishing clear standards for suppliers' employment practices, which includes the explicit consideration of modern slavery risks.

## Comcare's modern slavery risk approach and assessment

We have aligned our categorisation of procurement expenditure with the Commonwealth Government's procurement information system on [AusTender's](http://www.fenders.gov.au) website, [www.fenders.gov.au](http://www.fenders.gov.au), which uses a subset of the United Nations Standard Products and Services Code (UNSPSC) to categorise Commonwealth Government procurements. The finance system includes a UNSPSC field for all goods and services contracts which has improved our reporting capabilities and ensures greater consistency of data for suppliers and goods and services. We continue to ensure the UNSPSC code is updated as required.

We found no instances in our operations and/or supply chain where modern slavery risks are caused, or contributed to, by Comcare.

We use a due diligence and observance approach for the risk management of the suppliers we use through our external arrangements. We continued to monitor risks in the procurement of ICT hardware and our investment portfolio, in recognition that these industries pose higher levels of modern slavery risk. We continue to monitor and control risks identified through ongoing analysis of our supply chains to identify suppliers that may pose modern slavery risks, undertaking regular engagement with suppliers and other government entities to increase our understanding of our supply chains and associated modern slavery risks.

# Comcare's modern slavery risk actions

We manage our operations and supply chain risk by conducting risk assessments, as well as by regularly reviewing the risk assessments conducted for updates where new risks are identified or where risks change.

The risks we identify within our supply chain focus around sectors, industries, goods, services and their country of origin that are prone to modern slavery risk, as well as the use of entities for the procurement of goods and services that have a poor track record of modern slavery.

We reviewed and updated our risk assessment practices providing greater confidence that modern slavery risks are being managed and mitigated appropriately. The following strategies have been used to support our improved capability:

- updated procurement and contract management policy and procedural guidance to reflect Procurement Connected Policies and CPR's as they relate to modern slavery requirements
- promote our online modern slavery training to assist employees to identify, prevent and mitigate modern slavery risks across its procurement and operations
- engagement and collaboration with suppliers, other government entities and stakeholders to increase understanding of our supply chains and associated risks
- use of standard Commonwealth contracts (where applicable) to manage consistency with correct terms and conditions and with application of appropriate policy.

We are committed to continuous improvement of our management of modern slavery risk and have identified a range of actions for implementation including:

- regular engagement with suppliers and other government entities on procurement activities
- refinement arising from lessons learned
- deliberate effort to embed responsibility for managing human rights matters more generally across the organisation.

## Assessing for effectiveness

We have taken a risk-based approach and are committed to providing ongoing risk mitigation tracking and governance oversight. Our reporting and complaint processes for modern slavery related incidents are available for internal and external use. Complaints can be reported through several mechanisms including writing to:

- [Procurement.complaints@comcare.gov.au](mailto:Procurement.complaints@comcare.gov.au)
- [Feedback@comcare.gov.au](mailto:Feedback@comcare.gov.au)
- submitting an [anonymous online feedback](#) form via the Comcare's website.

For the statement reporting period, there have been no instances of modern slavery related complaints. We continue to monitor the effectiveness of our assessment for modern slavery risks through our reporting and complaint processes, procurement processes, risk assessments and audits.

# Annexure: Modern Slavery Act reporting requirement

The table below outlines the 7 mandatory criteria of the Modern Slavery Act and corresponding sections of the Comcare Modern Slavery Statement.

Modern Slavery Act requirement	Page number
section 16(1)(a) Identify the reporting entity	1
section 16(1)(b) Describe the entity structure, operations and supply chains of the reporting entity	1, 2, 3 and 4
section 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	5
section 16(1)(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	6
section 16(1)(e) Describe how the reporting entity assesses the effectiveness of such actions	6
section 16(1)(f) Describe the process 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	Do not own or control any other entities.
section 16(1)(g) Include any other information that the reporting entity considers relevant	Not required.

