



NACCHO
National Aboriginal Community
Controlled Health Organisation

Modern Slavery Statement For 30 June 2024

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Message from our CEO

As the CEO of NACCHO, I am proud to present our first Modern Slavery Statement. This document reflects our unwavering commitment to addressing the complex issue of modern slavery, not only as a legal requirement but as a fundamental expression of our values and mission.

NACCHO exists as the national peak body to serve Aboriginal and Torres Strait Islander peoples, ensuring their rights, cultures, and communities are respected and empowered.

NACCHO supports Government policies concerning anti-slavery but, at the same time, we feel obliged to point out the considerable irony in obliging an Aboriginal and Torres Strait Islander organisation to implement an anti-slavery policy. Most of the Elders in our 146 member organisations and among the almost 4,000 Aboriginal and Torres Strait Islander workers in the ACCHO sector have direct experience of slavery. The most common examples are found in the practice of 'stolen wages'. Many of our Queensland families also have connections to South Sea Islanders who were kidnapped and taken to Australia through the shameful practice of 'black-birding'. Many orphaned and stolen children were also deployed as domestic workers in slave-like conditions in all states and territories. Many early Aboriginal pastoral and domestic workers were sent to workplaces – sometimes in chains – where they received no wages, meagre rations and had little personal freedom. It was not until Federation in 1901, that legislation was first introduced to help ensure that Aboriginal people were paid. But conditions continued to be slave-like and it was not until 1968, after the Gurindji People's Wave Hill walk-off led by Vincent Lingiari, that the Government was pressured into mandating equal pay.

From these experiences we recognize that modern slavery can have a disproportionately negative impact on populations, both globally and within our own borders. For this reason, we are committed to taking a proactive stance in identifying, mitigating, and eliminating the risks of modern slavery in our operations and supply chains.

Our commitment to ethical practices is deeply rooted in the principles of equality, fairness, and justice, which guide everything we do. This Modern Slavery Statement is not just a compliance document; it represents our dedication to creating safe, fair, and just environments for everyone we work with—from our employees to our suppliers and the communities we serve.

We understand that addressing modern slavery is a complex and ongoing challenge. This statement outlines the steps we have taken and will continue to take, to identify and manage risks related to modern slavery. This includes collaborating with Aboriginal and Torres Strait Islander communities and businesses to promote ethical practices, as well as working with our partners to ensure that our supply chains remain free from any form of exploitation.

I would like to take this opportunity to thank the NACCHO Board, senior executives of NACCHO, and employees for their ongoing commitment to upholding these values. Together, we are determined to play our part in eradicating modern slavery and fostering an environment where all people are treated with the dignity and respect they deserve.

We look forward to continuing our journey toward greater accountability, transparency, and ethical practices, and I invite all stakeholders to join us in this critical mission.

Pat Turner
Chief Executive Officer
NACCHO

1 Introduction

- 1.1. This Modern Slavery Statement (the “**Statement**”) is made by the National Aboriginal Community Controlled Health (“**NACCHO**”), a national peak body for Aboriginal Community Controlled Health Organisations (ACCHOs) in Australia, in compliance with the Modern Slavery Act 2018 (Cth). This is NACCHO’s first Statement and is prepared in relation to the financial year ended 30 June 2024.
- 1.2. As an organization dedicated to advancing the rights, opportunities, and wellbeing of Aboriginal and Torres Strait Islander communities, we acknowledge our role in preventing modern slavery practices, both within our operations and across our supply chains.
- 1.3. NACCHO is committed to respecting Human Rights and taking all necessary steps to combat modern slavery and human trafficking. We recognize the vulnerability of Indigenous communities to exploitation and are dedicated to ensuring that our policies and practices respect human rights.
- 1.4. This Statement outlines our efforts to prevent and address these issues within our operations and the supply chains we use to procure goods and services. We aim to promote a culture of inclusivity, equality, and transparency while prioritizing ethical sourcing and operations.

2 Our structure, operations, and supply chains

2.1 Our Structure and Operations

- 2.1.1 NACCHO is the national peak body for Aboriginal and Torres Strait Islander health in Australia, providing advice and guidance to the Australian Government on policy and budget matters while advocating for community-developed health solutions that contribute to the quality of life and improved health outcomes for Aboriginal and Torres Strait Islander people.
- 2.1.2 NACCHO represents 146 Aboriginal Community Controlled Health Organisations (**ACCHOs**) across Australia. ACCHOs provide 3.1 million episodes of care a year for 410,000 people across Australia, including about one million episodes of care in remote regions.
- 2.1.3 As a registered charity operating as a company limited by guarantee, NACCHO operates under a formal constitution, as well as meeting its legal obligations under the Corporations Act and other legislation.
- 2.1.4 NACCHO’s head office is based in Canberra, ACT, with 146 ACCHOs operating throughout Australia.
- 2.1.5 NACCHO is guided by a Board of Directors, with the Chair and Deputy elected by its members to embody the principle of community control. The Board exercises its powers vested in it by the Corporations Act 2001. The Chief Executive Officer and the senior executive team manage and coordinate the operations of the organisation.

2.2 Our Supply Chain

- 2.2.1 To support our operations, NACCHO employed 99 employees as of 30 June 2024.
- 2.2.2 Our supply chains include procurement of goods and services for our various operations, including office supplies, technology services, clothing manufacturers (uniforms and promotional clothing), and support services (including accounting, legal, etc).

2.2.3 In FY24, our supply chain covered the following categories;

Category	Percentage of Spend	Percentage of Suppliers
Health-Related Services *	92%	35%
Consulting and contract services	4%	22%
Travel and Accommodation Services	2%	15%
Rent and outgoings	1%	1%
Building renovations	1%	1%
Program resources	< 1%	6%
Insurance Services	< 1%	1%
IT and telecommunications equipment	< 1%	1%
IT software and support	< 1%	1%
Postage, Storage and Freight	< 1%	1%
Office Supplies	< 1%	4%
Recruitment Services	< 1%	1%
Staff Development Activities	< 1%	3%
Catering Services	< 1%	6%
Telecommunication services	< 1%	1%
Subscriptions	< 1%	1%

* refers to contractual agreements with ACCHOs to deliver holistic, comprehensive, and culturally appropriate healthcare to the community it serves (e.g. medical supplies, healthcare services and support, consultancy, training, or health education programs)

2.2.4 Our suppliers include preferred suppliers with stable long-term relationships, short-term suppliers for urgent requirements, and one-off suppliers on an ad hoc basis.

2.2.5 Our direct suppliers are all located in Australia. However, we acknowledge that our direct suppliers are likely to rely on global supply chains. Our suppliers are expected to manage their business and supply chain in line with our **Supplier Code of Conduct** and in a manner that respects human rights as set out in the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.

2.2.6 We plan to investigate our supply chain beyond the first tier in future reporting periods when practically possible.

3 Our Workplace

3.1 NACCHO respects human rights and strives to offer proper conditions for all employees who will be treated with dignity and respect, in accordance with their intrinsic rights and freedoms.

3.2 We ensure compliance with relevant local and national laws, community expectations, and ethical standards related to modern slavery and human rights with respect to our employees, our contractors, and our business operations.

3.3 We ensure fair remuneration and benefit and will not tolerate, under any circumstance, forced labour, human trafficking, child labour, slavery, or any other human rights violation. This standard applies to the NACCHO workforce as well as to contractors, consultants, suppliers, and anyone authorized to act on NACCHO's behalf.

3.4 NACCHO builds and maintains a safe and inclusive workplace, treating everyone fairly and with respect, and provides a workplace free of discrimination and harassment, in line with our

Employee Code of Conduct Policy. NACCHO strictly prohibits threats, acts of violence, and physical and psychological intimidation.

4 Our policies and governance framework

- 4.1 NACCHO maintains high standards of corporate governance. Our Board and Board Committees provide the necessary leadership to implement strong corporate governance across the organisation so that our decisions and actions are based on transparency, integrity, and responsibility, which promotes the long-term sustainability and ongoing success of our organisation.
- 4.2 The **NACCHO Governance Framework** brings together all the governance policies and procedures that the Board considers necessary for the internal control and proper governance of the organisation.
- 4.3 NACCHO policies in key areas, include;
- Employee Code of Conduct
 - Fraud and Corruption Management Plan
 - Delegation of Authority Policy
 - Risk Management Framework
 - Management of Grievances Policy
 - Whistleblower Policy
- 4.4 We have an open-door policy and encourage our employees to raise concerns or feedback especially those of a legal and ethical nature. Employees may also raise their concerns through any of the reporting channels outlined in our **Whistleblower Policy** or our **Management of Grievances Policy**.

5 Risk of Modern Slavery in Our Operations and Supply Chains

5.1 Modern Slavery risks in our operations

- 5.1.1 In seeking to identify the Modern Slavery risks in our operations, we considered the potential for our organisation to cause, contribute to, or be directly linked to Modern Slavery. In doing so, we looked at:
- The risk that our operations and procurement practices may directly result in modern slavery practices,
 - The risk that our operations and/or actions in our supply chains contribute to modern slavery; and
 - The risk that our operations, products or services are connected to Modern Slavery through the activities of another entity, including business partners.
- 5.1.2 Given that our operations are based entirely in Australia, our geographic risk for modern slavery is **low** according to the Global Slavery Index. Furthermore, the risk of modern slavery occurring in our direct employment of workers also is low having regard to our unwavering commitment to compliance with the Fair Work Act and National Employment Standards.
- 5.1.3 The measures we have in place, as described further in Section 4 below, are designed to provide quality training, support, and development to each individual and mitigate the risks of Human Rights impacts.

5.2 Modern Slavery risks in our supply chains

- 5.2.1 NACCHO recognises we could be indirectly exposed to the risk of modern slavery and human trafficking through supply chains.
- 5.2.2 Our most salient Modern Slavery risks may be present in our supply chain and our procurement practices, including a broad range of direct suppliers from various industries, including those generally considered at higher risk for modern slavery by virtue of their sector risk and/or the higher risk components and raw materials that form part of the products manufactured in the sectors.
- 5.2.3 Examples include clothing manufacturers (uniforms and promotional clothing), cleaning services, consumables, and IT hardware. The risk profile of these sectors is heightened by the utilisation of base skilled workers with limited ability to negotiate their wages and rights in the workplace.
- 5.2.4 We are particularly aware of risks related to the exploitation of Indigenous peoples and strive to ensure our supply chains remain free of such practices.

6 Actions Taken to Address Modern Slavery

We recognise that Modern Slavery and human trafficking are grave violations of Human Rights and pose a significant global challenge. As part of our commitment to eradicate these practices, we have implemented the following measures;

6.1 In our operations

- 6.1.1 All NACCHO employees are engaged directly by us reducing the risk of modern slavery within our workforce as we endeavour to comply with Australian employment law.
- 6.1.2 An appropriate level of due diligence is conducted on prospective employees prior to them joining NACCHO, including a robust selection process, background checks, and employment references
- 6.1.3 Our employment conditions adhere to the legislation relevant to the jurisdiction in which the employees work. Our compensation packages are competitive and consistent with the laws that regulate minimum wage and overtime
- 6.1.4 We provide adequate training including necessary health and safety training.
- 6.1.5 Through the employee onboarding and induction process, new employees are introduced to NACCHO's core values and behaviour, which drives how we interact with each other, and how we work together.

6.2 In our supply chain

- 6.2.1 We conduct assessments of our suppliers to ensure they adhere to applicable laws and regulations and that they comply with anti-slavery standards.
- 6.2.2 We mapped our suppliers by reference to key categories of spend and criticality to service delivery to identify the suppliers requiring further due diligence.

7 Looking Ahead

- 7.1 At NACCHO, our approach to addressing modern slavery will continue to evolve, focusing on continuous improvement.
- 7.2 We recognise that consistency and capability building is key to facilitating the effective implementation and continuous improvement of a modern slavery reporting model.

7.3 Our objective is to embed modern slavery and human trafficking risk into our standard processes and as such, we plan to incorporate risk management practices into our business culture, processes, behaviours, and operating frameworks.

7.4 In the coming year, our focus will be on delivering against our FY24 Modern Slavery commitments;

Commitment	Status	Comments
Modern Slavery Policy	●	<p>NACCHO has finalised our Modern Slavery Policy and it has been formally adopted by the Board.</p> <p>This Policy applies to all NACCHO employees and suppliers.</p> <p>We also intend for this Policy to inform our suppliers that those obligated to report under the Act will need to provide NACCHO with a copy of their Modern Slavery Statement upon request.</p>
Supplier Code of Conduct for Procurement	●	<p>We have completed the Supplier Code of Conduct (Code). We intend to embed the Code into our supplier agreements to better capture our commitment to managing Modern Slavery risks.</p> <p>The Code requires prospective suppliers to self-certify compliance with the Code by responding to questions in respect of the supplier's Modern Slavery due diligence mechanisms.</p> <p>The Code articulates our expectation that suppliers will comply with all laws and regulations.</p>
Supplier Due Diligence Framework	●	<p>We will map our suppliers by reference to key categories of spend and criticality to service delivery to identify the suppliers requiring further due diligence.</p> <p>During our supplier selection process, we assess the potential risks of these issues and take appropriate action to mitigate them as part of the tender process.</p>
Employee Awareness Training	●	<p>In early 2025, we intend to equip our Board, senior executive teams, procurement staff, and client-employees with Modern Slavery awareness training.</p>
Modern Slavery Contract Clauses	●	<p>We will review our supplier contracts and tender templates to include anti-slavery clauses specifically to address the prevention of modern slavery practices.</p>
Assess and engage with at-risk suppliers	●	<p>Assess the source of promotional clothing or other at-risk suppliers as a possible modern slavery risk and ask the supplier for information on its supply and production processes relevant to modern slavery.</p>

● : Complete

● : On-Going or Partly Complete

● : Not Yet Commenced

8 Consultation and Engagement

- 8.1 NACCHO does not own or control any other entities.
- 8.2 In preparing this Statement, NACCHO has consulted with relevant stakeholders, to ensure a comprehensive understanding of modern slavery risks and best practices in addressing them
- 8.3 We will look into engaging the ACCHOs and the wider Aboriginal and Torres Strait Islander communities to understand their perspectives on modern slavery risks and to ensure our approach aligns with their values and expectations. We also will collaborate with other organisations and government bodies to strengthen our efforts to combat modern slavery.

9 Approval and Sign Off

- 9.1 This Modern Slavery Act Statement was approved by the NACCHO Board of Directors on **29 October 2024** and is signed on its behalf by the two members of the Board.
- 9.2 This Statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth).



Donnella Mills
Board Chair

29 October 2024



Chris Bin Kali
Deputy Chair

29 October 2024