



# Modern Slavery Statement

**2024-25**

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## Acknowledgement of Country

The National Disability Insurance Agency acknowledges the Traditional Owners and Custodians of country throughout Australia, and their continuing connection to land, sea, and community. We pay our respects to them and their cultures, and to Elders past, present, and emerging, and extend that respect to other Aboriginal and Torres Strait Islander people.

# Introduction

The National Disability Insurance Agency (NDIA) is deeply committed to inclusion, respect and human rights. Modern slavery of any form undermines the dignity and freedom every person deserves. As an agency that exists to support Australians with disability, we recognise our responsibility to ensure our operations and supply chains reflect the same values we champion every day.

In response to the National Disability Insurance Scheme (NDIS) review and long-term scheme reforms, the NDIA is committed in its collaboration with Commonwealth entities, suppliers and the broader disability sector to build a better NDIS by developing a unified system of support for people with disability. We promote ethical practices across supply chains, ensuring participants are safe, and the workers who support them are engaged in fair and ethical working environments.

This Modern Slavery Statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) (the Act) and outlines the actions taken during 2024-25 to identify, assess, and implement effective controls to mitigate modern slavery risks across the Agency's supply chain and operations.

This statement has been endorsed by the NDIA Board.

Signed,

A handwritten signature in black ink, appearing to read 'Kurt Fearnley', written over a faint circular stamp.

Mr Kurt Fearnley AO, Chair

6 November 2025

# Executive Summary

The NDIA acknowledges the critical importance of maintaining strong vigilant efforts in addressing modern slavery, both globally and within its own business operations and chain supply.

This Statement highlights our progress during the 2024-25 reporting period, including our ongoing efforts to promote a risk-aware culture, strengthen risk identification and evaluating the effectiveness of our policy and tools.

Our progress this period is driven by:

- **Measuring effectiveness** – We have implemented a tool to assess the effectiveness of our procurement framework, policy and tools introduced in 2022-23 and 2023-24, ensuring they deliver meaningful results to manage modern slavery risks.
- **Continuous Improvement** – Insights from our evaluations are helping us identify new opportunities to strengthen our approach and refine our practices.
- **Active Monitoring** – Remaining alert to changes in the policy environment, and external landscape, to ensure our controls remain appropriate and responsive, aligned with Commonwealth initiatives.

As we continue to deliver better outcomes for over 739,000 Australians with disability, we remain vigilant in our efforts to safeguard against modern slavery and promote ethical, fair, and inclusive practices across NDIA and its supply chain.

# Mandatory Criterion 1 & 2: Covered Entities Structure, Operations and Supply Chains

## Who we are

The NDIA is a Corporate Commonwealth Entity responsible for managing the NDIS as outlined under the Public Governance, Performance and Accountability Act 2013 (PGPA Act), with statutory authority under the National Disability Insurance Scheme Act 2013 (NDIS Act).

Improving participants' independence, and the social and economic participation, is at the core of the NDIS, while delivering a financially sustainable NDIS building genuinely connected and engaged communities and stakeholders.

As of 30 June 2025, we provided direct supports nation-wide to 739,414 participants. Importantly, more than 525,110 participants are receiving supports related to their disability for the first time<sup>1</sup>.

Our key role is to:

- Provide funding for reasonable and necessary supports to enable people with disability to exercise choice and control in the pursuit of their goals and the planning and delivery of their supports.
- Ensure the decisions and preferences of people with disability are respected and given appropriate priority.
- Promote the provision of high quality and innovative supports, enabling people with disability to maximise their independent lifestyles and inclusion in the community.
- Ensure a reasonable balance is achieved between safety and the right of people with disability to choose to participate in activities involving risk.

The NDIA has grown significantly since its inception. Through ongoing reform, partnerships with key stakeholders and informed workforce, the Agency continues to raise awareness for people with disabilities to create greater inclusion and accessibility to mainstream services, community and other government initiatives.

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<sup>1</sup> National Disability Insurance Agency - [NDIA National Dashboard as at 30 June 2025 \(External\)](#)

## NDIA Structure

The NDIA Board is the accountable authority of the NDIA and sets the Agency's strategic direction. In addition, the Board sets the objectives, strategies and policies to be followed by the Agency ([s124 NDIS Act \(External\)](#)).

The Board's responsibility is to:

- Ensure the proper, efficient and effective performance of the Agency's functions.
- Determine the objectives, strategies and policies to be followed by the Agency.
- Any other functions conferred on the Board by or under the NDIS Act, associated regulations or instruments made under the NDIS Act, and any other law of the Commonwealth.

The Board has three Board Committees assisting to meet its statutory requirements, manage risk and ensure the Agency achieves best-practice governance:



The Chief Executive Officer is responsible for the day-to-day administration of the NDIA.

## NDIA Operations

The national scheme has funding and governance shared among all governments. All Australian governments are involved in decisions relating to the scheme's policy, funding and governance:

- The [Commonwealth Minister](#) is responsible for administering the NDIS Act, and exercises statutory powers with the agreement of states and territories, including a power to make the NDIS Rules and direct the NDIA.
- The [Disability Reform Ministerial Council](#) is the decision-maker on NDIS policy issues. It is made up of Ministers responsible for disability from the Commonwealth, states and territories.
- The NDIA administers the scheme. It is governed by a Board.

- The NDIA Board is advised by the [Independent Advisory Council](#).
- The NDIA holds all funds contributed by the Commonwealth, states and territories in a single pool, manages scheme funds, administers access to the scheme and approves the payment of individualised support packages.

The NDIA's performance and operations are detailed in the Annual Report which is tabled in Parliament and is publicly available on the NDIS website and the [Commonwealth Government's Transparency Portal \(External\)](#).

The NDIA does not own or control other entities.

## NDIA Supply Chains

The NDIA's supply chains encompass a broad range of products and services, sourced through contractual arrangements with a diverse supplier base. Most of NDIA's procurement activities are primarily service focused, and where practicable, conducted through established government panel arrangements.

Our suppliers provide goods and services integral to the Agency's business operations, including:

**Operational Support** - Suppliers deliver essential services enabling NDIA's corporate functions to operate efficiently. This includes IT hardware and software, facilities management, and administrative support, essential to support the daily to day functions within the Agency.

**Implementation of the NDIS** - Through the provision of specialised services, suppliers play an important role to facilitate the effective delivery of the NDIS. Their contributions ensure systems, processes, and resources are in place to support participants and stakeholders whilst meeting statutory obligations under the NDIS Act via outsourced personnel and service agreements.

**Participant focused Service Delivery** - Many suppliers provide direct supports and services to NDIS participants, enabling them to access reasonable and necessary assistance tailored to their individual goals.

Additionally, the NDIA provides significant funding to NDIS participants enabling them to directly engage providers for the delivery of reasonable and necessary supports. This Statement reports on procurement activities from suppliers engaged through procurement approaches.



## Our Values

We are proud of our values-driven culture, based on those of the Australian Public Service (APS). These values are supplemented by our own, which underpin our actions and reflect our commitment to human rights and driving a culture of accessibility and inclusion. As part of this commitment, the NDIA dedicated to fostering an inclusive workplace culture.

## NDIA Values



### **We value people.**

We put participants at the heart of everything we do.



### **We grow together.**

We work together to deliver quality outcomes.



### **We aim higher.**

We are resilient and always have the courage to do better.



### **We take care.**

We own what we do and we do the right thing.

The NDIA recognises the important role all staff and partners play in identifying and managing risks, including those associated with modern slavery. Our continued commitment is reflected in the following actions:

- Providing ongoing staff training and professional development to build awareness and capability.
- Collaborating with partners and suppliers to promote ethical and best practice procurement approaches aligned with NDIA's legislative framework and Commonwealth Procurement Rules to ensure compliance.
- Embedding risk checks into procurement and contracting procedural material to strengthen the effectiveness of risk management.
- Enhancing procurement and contractual documentation by incorporating modern slavery clauses to reinforce supplier accountability.

# Mandatory Criterion 3: Risks

## Our Risks

We consistently maintain a structured approach to identifying, managing, escalating, and communicating key organisational risks. We use resources such as Commonwealth Government's toolkit '*Addressing Modern Slavery in Government Supply Chains*<sup>2</sup>' to assess our risks across the categories of:

- Sector and Industry
- Products and Services
- Geography
- Entity

Most goods and services procured by the NDIA are sourced from suppliers and contractors based in Australia. Our main categories of procurement are for the provision of:

- Service delivery of the NDIA functions to NDIS participants
- Information and communication technology
- Property and operational supports
- Professional services
- Human resources

Our three potential risk areas in this reporting period remains consistent with previous period:

### Risk 1 - Offshore sub-suppliers

Furniture, Textile and Information and Communications Technology (ICT) hardware and software are essential for the NDIA's function and operations. The supply of these goods often involves complex supply chains including raw material extraction, manufacturing, and assembly, that may be susceptible to exploitative labour practices, particularly among offshore suppliers. Multiple layers of subcontracting can obscure visibility and accountability, making it harder to detect and address risks.

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<sup>2</sup> Commonwealth Government of Australia, Attorney-General's Department, *Australian Government's Response to Modern Slavery, including Procurement Toolkit*, accessed 25 July 2025: [Modern Slavery Toolkit for Government Procurement Officers \(External\)](#)

## Risk 2 - Providers of supports

The NDIA's core function is to deliver the NDIS. In doing so, the NDIA engage providers to deliver accessible, innovative supports and services to NDIS participants. All providers are required to comply with the NDIS Code of Conduct, which mandates the protection and promotion of human rights for every individual. Registered providers must also meet the NDIS practice standards, which set benchmarks for quality and safety in service delivery.

A key risk factor for modern slavery is lack of oversight in complex provider markets, especially in 'remote to very remote' communities in Australia. Market stewardship principles and improved market monitoring established as part of the Market Stewardship Framework currently being developed by Commonwealth co-stewards (the Department of Health, Disability and Ageing, NDIA and the NDIS Commission) will support ethical service delivery and ongoing risk assessment.

## Risk 3 - Facilities Management services

Facilities management services often employ unskilled workers from low socioeconomic backgrounds and vulnerable populations including migrants and culturally and linguistically diverse individuals and communities. Acknowledging the elevated risk within this sector, the NDIA maintains active engagement with our service providers to mitigate exposure to exploitative labour practices.

## Risk Exposure

The NDIA continues its vigilance and structured risk approach to supply chain oversight. A 'high-risk' lens is consistently applied to high-risk procurement activities and throughout the entire contract lifecycle. This is further supported by the increased use of established Commonwealth panel arrangements and open tender procurement processes for goods and services procured by the Agency.

Within the 2024-25 reporting period, the risk of Modern Slavery exposure for the NDIA is **low** due to the following measures:

Procurement from Australian Suppliers



**99%** of NDIA contracts, by volume, are held with **Australian suppliers**.

**78%** of these contracts were awarded to **small and medium enterprises (SME)**.

## Panel Approaches for Procurement



**77%** of NDIA contracts were awarded under panel arrangements established by Australian Government agencies bound by the Commonwealth Procurement Rules. By leveraging on panel procurements, risks are often mitigated by the structured oversight and regulatory frameworks in place.

## Risk Screening Implementation

Over the reporting period, the NDIA has maintained procurement risk profiling measures when undertaking procurement processes to mitigate modern slavery risks. We delivered this through:

**Improved early risk detection** – In alignment with the NDIA procurement policy, strategic risk screening tools applied early in procurement processes support staff to assess and evaluate modern slavery risks.

For more complex high-risk procurements, suppliers are invited to complete the ‘*Supplier Self-Assessment Questionnaire*’, included as part of the procurement evaluation process. This safeguard enables staff to identify indicators of unethical working standards, as well as assess supplier oversight of labour hire practices and subcontractor engagements during the evaluation process, supporting well-informed procurement decisions.

**Enhanced documentation** – Procurement and contract management documentation, guides and templates were refined to support best procurement practices. These materials are periodically reviewed to ensure alignment with current legislative requirements under the Commonwealth Procurement Rules.

**Increased vigilance and awareness** - 78% of NDIA contracts are awarded to SMEs, many of which may not be obligated to publish Modern Slavery Statements. Whilst existing strategy in building awareness is effective, there is opportunity to further build awareness when engaging with SMEs.

**Oversight and management** - The NDIA Board continues to maintain oversight of organisational risk through the Audit and Risk Committee, which is responsible for reporting breaches of regulatory and legislative obligations, including those under Modern Slavery legislation.

# Mandatory Criterion 4: Actions

## Managing risks for provider of support

In line with the NDIA's function to manage the financial sustainability of the NDIS, the NDIA Market Stewardship Framework is being revised to improve the Australian Government's stewardship of provider markets. The Department of Health, Disability and Ageing is leading this initiative, working closely with the NDIA and the NDIS Quality and Safeguards Commission, and engaging states and territories.

**Market monitoring and intervention** – Identifying exploitative practices such as worker underpayment and fostering collaboration across government agencies to mitigate labour exploitation risks and manage emerging modern slavery concerns within the disability market sector.

**Ethical market growth** - The revised Market Stewardship Framework will focus on identifying when and how co-stewards, should intervene to address issues in the disability market, monitor the market, and what strategies should be adopted to steward the market. The revision of the existing framework is supported by the following key initiatives:

- Identifying potential policy and market objectives and market levers available to the co-stewards.
- Commencing consultations on better defining metrics for monitoring market performance.
- Considering market stewardship governance arrangements (including roles and responsibilities of co-stewards).

Through market monitoring and targeted interventions Commonwealth co-stewards, including the NDIA, contribute to a safer and more equitable environment for both providers and people with disabilities. This approach aligns with broader Commonwealth efforts to uphold human rights and mitigate modern slavery across the disability market sector.

## Internal capability and awareness

Procurement staff are central to NDIA's efforts to build capability across the agency; we leverage on the Australian Attorney-General's Department's online training modules via the *Modern Slavery Register* webpage<sup>3</sup>. Modern Slavery training is a requirement for all NDIA procurement specialists within the Procurement Branch.

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<sup>3</sup> Commonwealth Government of Australia, Modern Slavery Register, accessed 25 July 2025, [Modern Slavery Register Resources](#)

Consistent with previous reporting, the NDIA has maintained a **100% compliance** with Modern Slavery training requirements.

In May 2025, NDIA procurement representatives participated in the International Contracting Officer Forum hosted by Canada, alongside with New Zealand, Australia and Canada. The forum focused on best government procurement practices, sharing of insights and experiences to combat modern slavery risks.

## Monitoring Compliance in High-Risk Areas

The NDIA has assessed its exposure to Modern Slavery risks within our major procurement activities. Consistent with previous assessments, categories of concern are labour hire, ICT, service delivery, property services and capital works.

### Human Resources



In this reporting period, **96%** of labour hire engagements continue to be procured through panel arrangements. All labour hire contracts awarded are exclusively Australian-based companies. The NDIA's consolidated labour hire supplier base enables efficient management of workforce contracts and supports ongoing relationships providers to mitigate modern slavery risks across the labour workforce.

### Information Communications Technology



The Commonwealth identify ICT hardware as a high-risk area linked to modern slavery. The Digital Transformation Agency manages the online marketplaces by facilitating government procurement with ICT industry suppliers. The NDIA acknowledges modern slavery risks are prevalent in ICT supply chains, and leverages on government arrangements and panels as part of its mitigation strategy to manage risks.

### Property, Operational Supports and Capital Works



Our property services continue to be delivered by Jones Lang LaSalle (JLL) through the Whole-of-Australian-Government property services coordinated procurement arrangements. Under its agreement with Commonwealth, JLL has obligations to ensure adherence to the overarching agreement with the Government and the Modern Slavery Act 2018.<sup>4</sup>

JLL continues to demonstrate a strong commitment to managing modern slavery risks across its operations and supply chains. Its supplier framework provides guidance to suppliers throughout the entire contract lifecycle, promoting ethical and

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<sup>4</sup> Commonwealth Government of Australia, Modern Slavery Act 2018, Accessed 12 September 2025: <https://www.legislation.gov.au> (External)

compliant practices. JLL also maintains transparency publishing its Modern Slavery statements on global public registers.

## Service Delivery



The **National Call Centre** represents the agency's largest service delivery output in this reporting period. The Agency maintains a governance process to supplier management, embedded with assurance and compliance controls to manage modern slavery risks. The suppliers reinforce its commitment to ethical standards through annual Modern Slavery statements submissions to the Commonwealth Government's public register in alignment with the Modern Slavery Act.

## Desktop review and insights

During this reporting period, the NDIA conducted a desktop review targeting small sample of procurements across our identified high-risk categories. The review focused on assessing the effectiveness of:

- the application of risk profiling tools and the supplier '*Self-Assessment Questionnaire*' at the procurement planning process; and
- incorporation of the NDIA additional contract terms to include Commonwealth's model modern slavery clauses with graduating obligations suited to the risk profile of the procurement.

During the review process, 90% of procurement activities were assessed as '**Compliant**', supported by the following key observations:

- Strategic risk rating tools applied at the right checkpoints to identify, assess and manage those risks.
- Procurement and contract management documentation suite include appropriate clauses, aligned with Commonwealth Procurement Rules.
- A significant portion of procurement activities were conducted through established government arrangements and panels, leveraging on Commonwealth's best practice.

The review indicates the strategy is being appropriately applied in high-risk procurements. However, it also identified opportunities to strengthen awareness of modern slavery risks among engagements with small to medium sized suppliers.

The NDIA remains committed to its ongoing vigilance during procurement processes to identify risks and apply effective mitigation controls to manage modern slavery risks across our supply chain.



# Mandatory Criterion 5: Effectiveness

## Assessing the effectiveness of our actions

The NDIA is committed to continuously monitor and improve the effectiveness of our initiatives in targeting modern slavery. This reporting period our review highlighted the Agency has the foundations to identify risks during the procurement planning processes. The review also identified opportunities for improvements in bringing awareness of modern slavery risks with the small and medium enterprises we engage.

## Assessment of 2023-24 Commitments

In our 2023-24 Statement we committed to improving our operational policies to address modern slavery and its associated risk factors. We have successfully completed these activities and integrated them into our core business practices.

We have:

- √ Achieved 100% compliance ensuring all new procurement officers completed the Commonwealth Government's online Modern Slavery module training.
- √ Monitored the effectiveness of our updated policy and templates through sampling selected procurements and contracts in high risk/high value areas.
- √ Monitored and updated the modern slavery risk assessment for NDIA operations and supply chains. The assessment for the financial year remains as 'low'. and we will continue throughout the year for reporting in the next modern slavery statement.
- √ Collaborated with industry peers and the Department of Social Services Portfolio Cross Agency Procurement Working Group to share insights and experiences in the Commonwealth combating modern slavery.
- √ Participated in the International Contracting Officer Forum hosted by Canada alongside New Zealand and Australia focusing on combatting human trafficking in government procurement.



## Forward Commitments

We will monitor the effectiveness of modern slavery risk management initiatives throughout business operations and supply chain in 2025-26, as detailed in Table 1 below.

**Table 1: Table of Commitments for 2025-26**

Commitment	Status	Comment
<b>Training</b>		
All Procurement Staff are to complete the Modern Slavery training to ensure awareness of this issue.	In Progress	<p>We will continue to encourage training to all procurement staff and contract managers managing contracts in high-risk sector.</p> <p>This ongoing commitment will be actioned and reported each year.</p>
<b>Monitoring and Mitigation</b>		
Monitoring legislative changes and Commonwealth progress on the audit to its procurement procedures and supply chains.	In progress	Review the impact of Commonwealth's audit and update strategy, policy, guidance material and templates as appropriate.
Monitor and update modern slavery risk assessment for NDIA operations and supply chain.	In Progress	This ongoing commitment will be reviewed and updated throughout the year, for reporting in the next Modern Slavery Statement.
Monitor for incidence.	In Progress	This ongoing commitment will be reviewed for effectiveness and continuous improvement each year.
<b>Compliance</b>		
Review effectiveness of our updated policy and templates.	In progress	Continue conducting procurement and contract management assessments across high risk/value categories. If required, develop guidance for small and medium suppliers in the high risk/value category.
<b>Collaboration and Engagement</b>		
Collaborate with industry and other Commonwealth entities to leverage on Commonwealth initiatives in combatting modern slavery.	In Progress	<p>Monitor the progress of Commonwealth's review of Modern Slavery in its supply chain to understand impacts to current strategy.</p> <p>Participate in Commonwealth forums and working group to keep informed of developments and share experiences in combating modern slavery.</p>

**End of Table 1**

## Mandatory Criterion 6: Consultation

The NDIA is not required to report on the **Mandatory Criterion 6** (the Act, section 16.1(f)) due to its status as a Corporate Commonwealth Entity that does not control or own other entities<sup>5</sup>.

## Mandatory Criterion 7: Other Information

The NDIA has **no other information** to supply under Mandatory Criterion 7 (the Act, section 16.1(g)).

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<sup>5</sup> Commonwealth Government of Australia, Modern Slavery Act 2018, Accessed 19 September 2024:  
<https://www.legislation.gov.au> (External)