



# **Modern Slavery Statement** for the financial year ended 30 June 2025

December 2025

## 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 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 colonization 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, together with 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 is constantly seeking 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 Ms. Gill Callister PSM. The Chief Executive Officer is Mr. Justin Untersteiner.

### 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 Corporate Affairs and Regulatory Governance, Finance and Risk, Health Workforce, Health Regulation, People and Culture, and Technology.

### Supply chains

Due to the specific nature of its operations, Ahpra maintains a relatively limited supply chain, which inherently presents a low risk of modern slavery. Nevertheless, Ahpra remains vigilant and takes proactive steps to ensure compliance with all relevant legislation in its contractual relationships with suppliers. Suppliers engaged by Ahpra are required to comply with all applicable laws and regulations. In addition, Ahpra expects its suppliers to implement reasonable and practical measures to prevent modern slavery within their own supply chains. Ahpra has not received any reports of modern slavery or human trafficking in relation to its suppliers. This marks the fourth consecutive reporting period without any such incidents. Should any serious allegations arise, Ahpra is committed to promptly reporting the matter to the appropriate authorities.

Ahpra works collaboratively with its service users and suppliers to ensure the delivery of high-quality, safe regulatory services. These efforts align with the objectives of the National Scheme during the reporting period, which include:

- Protecting the public
- Improving access to healthcare services
- Supporting and increasing a skilled and responsive health workforce

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

As a values-driven organisation, Ahpra recognises its responsibility to identify and respond to any potential incidents of modern slavery in a timely and appropriate manner.

For this reporting period, Ahpra assessed modern slavery risks across two key categories: **people risk** and **supplier risk**. Both categories were assessed as low risk, with no incidents reported.

#### People risk

People risk refers to the potential reliance on migrant, seasonal, or low-skilled workers, or the use of offshore labour agencies for service delivery.

Ahpra places people at the centre of its operations and has implemented robust controls to mitigate modern slavery risks. In FY 2024/25, Ahpra strengthened its commitment by embedding its Health, Safety and Wellbeing (HSW) Management System Framework. This framework provides clear guidance on HSW requirements in procurement and contract management, including the use of outsourced services via consultants or consultancy firms.

Key controls supporting a safe and ethical working environment include:

- Senior Leader and Executive Director approval for overtime based on operational needs
- A comprehensive suite of people-focused policies, including health and wellbeing resources, Respect@Ahpra policies promoting inclusivity, and conflict resolution guidelines
- Regular staff engagement surveys, with results reviewed and acted upon by leadership and people managers
- A Code of Conduct outlining clear behavioural expectations for all employees

#### Supplier risk

Supplier risk refers to the potential for labour exploitation in the provision of key goods and services.

While Ahpra's current supply chains are not considered to pose a high risk of serious exploitation under the Modern Slavery Act, the organisation acknowledges that certain risk factors—such as geographic origin, product type, and industry sector—may be relevant. Ahpra procures a variety of goods and services, including IT services, office supplies, building materials for interior refurbishments, and catering services. Some of these may originate from regions where forced or child labour is prevalent.

To address these risks, Ahpra has integrated modern slavery risk screening into its procurement practices, using the Department of Home Affairs' Addressing Modern Slavery in Government Supply Chains Toolkit. Where risks are identified, Ahpra engages with suppliers to understand and assess their modern slavery policies and practices. This approach enhances staff awareness and ensures focus on areas within Ahpra's control or influence.

Ahpra acknowledges that modern slavery is a complex and evolving issue, with risks that may change as operational needs shift and supply chain visibility improves. Given the multi-tiered nature of supply chains, there remains a possibility that modern slavery risks may exist beyond Ahpra's direct oversight.

## Actions to address modern slavery risks

Ahpra remains firmly committed to identifying, preventing, and addressing the risks of modern slavery within its operations and supply chains. Over the FY 2024/25 reporting period, Ahpra has continued to strengthen its approach through the following actions:

- **Ongoing Implementation of the Modern Slavery Policy**

Ahpra has continued to embed its Modern Slavery Policy into procurement practices, reinforcing governance and ensuring compliance with the Modern Slavery Act. The policy provides a structured framework for identifying and mitigating risks and supports informed decision-making throughout the procurement lifecycle.

- **Operationalising Risk-Based Procurement Procedures**

Ahpra has further matured its procurement processes by integrating modern slavery risk assessments into routine procurement activities. Particular attention is given to industries and sectors identified as having elevated vulnerability to modern slavery practices.

Under this procedure, procurement leads are required to assess both the overall risk profile of the procurement activity and the specific risk profile of potential suppliers prior to engagement or contract renewal. This enhanced due diligence includes consideration of:

- Geographic location of suppliers
- Industry or sector risk
- Nature of goods or services provided
- Supplier governance and oversight mechanisms
- Publicly available information
- Ongoing monitoring and review of risk mitigation effectiveness, including reporting and disclosure of outcomes

These practices reflect Ahpra's commitment to continuous improvement and the integration of modern slavery considerations into core procurement decision-making.

## Addressing People Risk

Ahpra maintains a strong focus on ethical employment practices and has implemented a range of controls to mitigate people-related risks associated with modern slavery. These include:

- Clear and transparent role descriptors and job advertisement templates
- Recruitment training and structured interview guides to support fair and equitable hiring
- Compliance with the Enterprise Agreement and Fair Work Statement, including verification of citizenship and work eligibility for non-Australian workers
- Monitoring of legal working age requirements and alignment with selection criteria based on experience
- Mandatory pre-employment checks, including criminal history and reference checks
- Assurance of fair remuneration and 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.

## Reporting and Continuous Improvement

Ahpra maintains a **Public Interest Disclosure (Whistleblower) Policy**, which provides a safe and confidential mechanism for individuals to report concerns about improper conduct, including potential modern slavery-related issues. This process supports Ahpra's integrity and independence in addressing serious matters.

Ahpra is committed to the ongoing review and refinement of its modern slavery risk management practices. It will continue to monitor emerging risks, evaluate the effectiveness of its actions, and report annually in accordance with the Modern Slavery Act. Through collaboration with suppliers and stakeholders, Ahpra aims to uphold ethical standards and contribute to the prevention of modern slavery across its operations and supply chains.

## Assessing the effectiveness of Ahpra's actions

Ahpra employs a continuous improvement approach to assess the effectiveness of its actions in identifying and addressing modern slavery risks. This includes a combination of monitoring, stakeholder engagement, and internal review mechanisms:

- **Monitoring Policy Implementation**

Ahpra continues to track the implementation of its Modern Slavery Policy and associated procedures. Progress is monitored through a dedicated user group, with feedback actively sought from relevant stakeholders to ensure the policy remains effective and fit for purpose.

- **Supplier Engagement Tracking**

Engagement with suppliers identified as having elevated risk profiles is monitored to ensure they are taking appropriate steps to mitigate potential modern slavery risks. This includes follow-up discussions and documentation of supplier responses and actions.

- **Reviewing Grievance Reports**

All grievance reports, including those submitted through Ahpra's whistleblower mechanism, are reviewed to identify emerging trends or areas of concern. This process supports early detection and responsive action where risks may arise.

Ahpra is committed to strengthening these assessment measures over future reporting periods. It will continue to explore additional qualitative indicators and feedback mechanisms to enhance its understanding of effectiveness and drive continuous improvement in its modern slavery response.

## Looking forward

Ahpra remains steadfast in its commitment to preventing and addressing modern slavery risks across its operations and supply chains. Over the past year, significant progress has been made, including the development of clearer guidelines and more structured processes for identifying and mitigating risks related to both supply chain and employment practices.

In the upcoming reporting period, Ahpra will continue to:

- **Monitor and refine risk management practices**, ensuring alignment with evolving best practice standards
- **Review and update key policies**, including the Modern Slavery Policy, Supplier Code of Conduct, and supporting procedures
- **Continue to prioritise staff training and awareness**, ensuring employees are equipped with the knowledge and tools to identify and respond to modern slavery risks relevant to their roles

These initiatives reflect Ahpra's commitment to ethical conduct, transparency, and continuous improvement. By embedding modern slavery considerations into its governance and operational frameworks, Ahpra aims to uphold its values and contribute meaningfully to the prevention of exploitation within its sphere of influence.

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 09 December 2025



Gill Callister PSM

**Chair, Ahpra Board**

Date: 16 December 2025