

# Modern Slavery Statement for the year ended

30 June 2023

Australian Health Practitioner Regulation Agency (Ahpra)

#### **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.

We acknowledge Aboriginal and Torres Strait Islander cultures as the oldest continuing cultures in the world. Aboriginal and Torres Strait Islander Peoples never ceded sovereignty and we recognise the impacts colonisation continues to have on the health of Aboriginal and Torres Strait Islander Peoples to date. We acknowledge Aboriginal and Torres Strait Islander Peoples for their continuing connection to culture, language, and Country; along with Elders past, present and emerging and the ancestors that walk with Aboriginal and Torres Strait Islander people every day.

#### Introduction and Identity of Reporting Entity

This is the second 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. Martin Fletcher.

#### **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 our 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:

**<u>Professional standards</u>**: Ahpra provides policy advice to the National Boards about registration standards, codes, and guidelines for health practitioners.

**<u>Registration</u>**: 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.

**<u>Compliance</u>**: Ahpra monitors, and audits registered health practitioners to make sure they are complying with Board requirements.

<u>Accreditation</u>: 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 Regulatory Operations, Strategy and Policy, People and Culture, Finance and Risk and Information Technology.

#### **Supply Chains**

Due to the nature of Ahpra's work and role, we have a limited supply chain, and our supply chain carries a low risk of modern slavery occurring. Ahpra does, however, mitigate the risk of breaches of relevant laws in its contractual arrangements with suppliers.

Ahpra's suppliers are required to comply with all relevant laws and regulations. Further, it is Ahpra's expectation that suppliers take reasonable and practical steps to mitigate the risk of modern slavery occurring in their supply chains.

To date, Ahpra has not been made aware of any allegations of slavery or human trafficking activities against any of its suppliers. Should any such allegations arise, Ahpra would take immediate action to report the matter to the relevant authorities.

Ahpra works with our service recipients and suppliers to ensure the delivery of high-quality and safe regulatory functions in accordance with our National Scheme, which during the reporting period were:

- Protecting the public;
- Facilitating access to health services; and
- Fostering a competent and flexible health workforce.

## **Risk of Modern Slavery Practices within Ahpra's Supply Chains**

As a values-based organisation, Ahpra considers it an important responsibility to ensure that we identify and respond to any incidents of modern slavery in an appropriate and timely manner.

For this statement, Ahpra's assessment of modern slavery risks in its operations and supply chain considered two main categories of risk: people risk and supplier risk.

The exposure to modern slavery risk in Ahpra relates to people risk and supplier risk – both are which are baselined to be low.

#### **People Risk**

People Risk, being the risk of a reliance on migrant, seasonal or unskilled workers, or a reliance on offshore labour agencies to deliver key services.

Ahpra is an organisation that places people at the centre of its operations and has implemented strong measures to minimise the risk of modern slavery. These measures include:

- An Enterprise Agreement that exceeds National Employment Standards with published salary ranges and employment conditions approved by the Fair Work Commission.
- Approval for overtime worked based on operational requirements by Senior Leaders and/or Executive Directors.
- A comprehensive suite of people-focused policies that includes health and wellbeing resources to promote a healthy work-life balance, respect@Ahpra policies that foster an inclusive and collaborative culture, and clear guidelines for conflict resolution.
- Staff engagement surveys conducted to gauge employee satisfaction, with results and actions arising discussed by the Ahpra leaders and all people managers.
- An Ahpra Code of Conduct that sets clear expectations for all employees.

#### **Supplier Risk**

Supplier Risk, being the potential associated (known or reported) of labour exploitation in the supply of key services.

It is unlikely that Ahpra's current and immediate supply chains have risks which meet the threshold for serious exploitation as defined by the Act. However, there is a recognition that slavery risks can be linked to indicators such as geographical locations, some goods and certain industries or sectors. Ahpra procures a range of goods and services, including IT (Information Technology) services, office supplies, and catering services. Some of these goods and services may be produced in countries where forced labor or child labor is a problem.

Ahpra has taken proactive measures to address modern slavery risks within its procurement practices. Utilising the Department of Home Affairs 'Addressing Modern Slavery in Government Supply Chains Toolkit' risk screening tool, Ahpra's procurement team has integrated specific modern slavery procedures into procurement practices. If any risks have been identified, Ahpra's procurement team will take steps to mitigate those risks, such as by engaging with suppliers about their modern slavery policies and practices. This approach enables Ahpra staff to enhance their awareness and understanding of modern slavery risk, whilst focusing on those items within Ahpra's control or contribution.

As operational requirements change and supply chain understanding improves, modern slavery risks to Ahpra will also change. Modern slavery is a complex and dynamic issue, and the ways in which it manifests can vary depending on the industry, the country, and the specific supply chain.

Additionally, supply chains can be complex, with multiple tiers of suppliers and subcontractors. There is a risk that links to modern slavery may exist further down the supply chain, outside Ahpra's visibility and control.

## Actions to address Modern Slavery risks

Ahpra is committed to preventing and addressing the risks of modern slavery in its operations and supply chains. Ahpra has taken the following actions to mitigate these risks:

- Developed and implemented Modern Slavery Policy to prevent and address modern slavery risks in Ahpra's operations and supply chains. The policy is designed to provide strong governance and ensure that Ahpra is compliant with the Act.
- Developed a modern slavery procedure to address the risks of modern slavery in its supply chains. The procedure requires Ahpra's procurement team to consider the general risk profile of the procurement or the risk profile of the supplier relating to modern slavery compliance, before engaging a supplier or renewing an existing contract.
- Developed a Supplier Code of Conduct that sets out Ahpra's expectations for its suppliers to comply with relevant laws and standards on human rights, labour rights, environmental protection, and anti-corruption.
- Developed and implemented appropriate actions to prevent, mitigate, or remediate any identified modern slavery risks. These include:
  - conducting due diligence on screening and selecting suppliers, which includes modern slavery questions and a risk rating to identify potential high-risk suppliers that require further assessment or engagement. This assessment will consider factors such as:
    - o geographic locations
    - o sector
    - product or service offering
    - existing governance and oversight arrangements
    - monitoring and reviewing the effectiveness of the actions; by reporting and disclosing outcomes of the risk analysis and the on-going management process.
- Utilise Ahpra's grievance mechanism for reporting any concerns or complaints related to modern slavery practices in Ahpra's operations or supply chains.

Further to the above, Ahpra also has a public interest disclosure (whistle-blower) process, that enables any person to speak up and report concerns about possible improper conduct or corruption (including issues relating to modern slavery) engaged in by Ahpra personnel. This process ensures that Ahpra maintains its independence and integrity.

Ahpra will continue to monitor and review its modern slavery risks and actions on an ongoing basis, and report on its progress annually in accordance with the Act. Ahpra is committed to working collaboratively with its suppliers and stakeholders, to prevent modern slavery practices in its supply chain and operations.

## Assessing the Effectiveness of Ahpra's Actions

Ahpra assesses the effectiveness of the actions it is taking to assess and address modern slavery risks in several ways, which form part of an overall continuous improvement approach. These actions include:

- Monitoring the implementation of its modern slavery policy and procedure. Ahpra has been tracking the progress of its user group and ensure that its policy and procedure are being implemented effectively with feedback sought from relevant stakeholders.
- Tracking supplier engagement. Ahpra tracks the progress of its engagement with suppliers that may be of risk, to ensure that they are taking steps to mitigate any potential modern slavery risks.
- Reviewing grievance reports. Ahpra reviews all grievance reports (including any whistle-blower reports) received through its grievance mechanism, to identify any emerging trends or areas of concern.

Ahpra will continue to adapt and strengthen these assessment measures over future reporting periods, to allow continual improvements in the approach to addressing modern slavery and will consider other qualitative measures going forward.

## Looking forward

Ahpra remains committed to preventing and addressing any potential modern slavery in its operations and supply chains. In the next reporting period, there will be a continued focus on reviewing and refining key policies and guidance including Ahpra's Procurement Policy and Supplier Code of Conduct.

There will continue to be an ongoing focus on training and support within the organisation, ensuring internal staff continue to be educated on modern slavery risks that may exist, as they carry out their respective duties.

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 14<sup>th</sup> November 2023.

Gill Callister PSM Chair, Ahpra Board Date: 14 November 2023



## **Australian Health Practitioner Regulation Agency**

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