

February 2026

Adelaide PHN Modern Slavery Statement FY 2024-2025

phn
ADELAIDE

An Australian Government Initiative

We acknowledge the Kurna peoples who are the traditional Custodians of the Adelaide Plains. We pay tribute to their physical and spiritual connection to land, waters and community, enduring now as it has been throughout time. We pay respect to them, their culture and to Elders past and present. We would also like to acknowledge and pay our respects to those Aboriginal and Torres Strait Islander people from other Nations who live, work, travel and contribute on Kurna Country.

Contents

Adelaide PHN Statement and Approval	4
Reporting entity	5
Structure, operations and supply chains	5
Supply chains	6
Modern slavery risks	7
Actions taken to assess and address risks	8
Assessing effectiveness of actions	9
Consultations	10
Other information	10

While the Australian Government Department of Health and Aged Care has contributed to the funding of this material, the information contained in it does not necessarily reflect the views of the Australian Government and is not advice that is provided, or information that is endorsed, by the Australian Government. The Australian Government is not responsible in negligence or otherwise for any injury, loss or damage however arising from the use of or reliance on the information provided in this statement.

Adelaide PHN Statement and Approval

Adelaide Primary Health Network (Adelaide PHN) is a reporting entity for the purposes of the Modern Slavery Act 2018 (Cth) and therefore is required to prepare and publish an annual Modern Slavery Statement (“**Statement**”) which describes actions to assess and address modern slavery risks in its operations and supply chains.

Modern slavery refers to the severe exploitation of people for personal or commercial gain, involving coercion, threats, or deception that strip individuals of their freedom. Under the Modern Slavery Act 2018 (Cth), it includes eight forms of serious exploitation:

1. trafficking in persons,
2. slavery,
3. servitude,
4. forced marriage,
5. forced labour,
6. debt bondage,
7. deceptive recruiting for labour or services, and
8. the worst forms of child labour - situations where children are subjected to slavery or engaged in hazardous work.

This Statement has been prepared by Adelaide PHN for the 2024–2025 financial year (1 July 2024 to 30 June 2025).

In accordance with the Modern Slavery Act 2018 (Cth), this Statement meets the seven mandatory reporting criteria. It:

1. identifies the reporting entity;
2. outlines Adelaide PHN’s structure, operations and supply chains;
3. describes risks of modern slavery practices within those operations and supply chains;
4. describes actions taken to assess and address those risks;
5. describes how Adelaide PHN assesses the effectiveness of these actions;
6. (if applicable) describes the consultation process with entities the organisation owns or controls; and
7. (if applicable) includes any other relevant information

This statement was approved by the Board of Directors, as the principal governing body of Adelaide PHN on **23 February 2026**.



Chair of Board

Dr. Melanie Smith
Adelaide PHN

Reporting entity

Adelaide Primary Health Network Ltd (ABN 18 155 472 067) is an independent, not-for-profit company limited by guarantee, registered as a charity under the Australian Charities and Not-for-profits Commission Act 2012 (Cth).

The organisation is incorporated in Australia, with its head office located at Level 1, 22 Henley Beach Road, Mile End, South Australia, 5031.

Structure, operations and supply chains

Adelaide PHN is one of 31 Primary Health Networks (PHNs) established by the Australian Government Department of Health, Disability and Ageing to strengthen Australia's primary health system and improve health outcomes across local communities.

Adelaide PHN commissions health and community services and coordinates primary health care across the Adelaide metropolitan region. It is an office-based organisation that operates entirely within Australia.

Its objective is to meet population health needs and improve access to services for communities with the highest needs by:

- identifying and addressing health service gaps through planning and analysis,
- commissioning safe, equitable services in response to community needs,
- improving access to care for priority populations, and
- partnering to coordinate and integrate local health care, commission services, and build the capacity and capability of providers to improve quality of care and deliver better health outcomes.

The organisation's governance framework comprises a Board of Directors established under the Corporations Act 2001 (Cth) and its Constitution. The Board is supported by the following committees:

- Governance and Remuneration Committee
- Finance, Risk, and Audit Committee
- Commissioning Oversight Committee
- Board Selection Committee

Adelaide PHN maintains ongoing supplier relationships that support both its commissioned activities and organisational operations. These relationships are generally stable and long term, to support consistent service delivery.

Supply chains

Adelaide PHN's supply chains comprise two main categories:

Commissioned Service Providers (CSPs)

The majority of expenditure within Adelaide PHN's supply chains in FY2024–25 related to commissioning activities. During the reporting period, Adelaide PHN entered 66 new contracts with 57 CSPs to deliver services across its region.

These providers include general practices, community health organisations, hospitals and non-government organisations that operate within Australia. CSPs deliver programs and initiatives in Adelaide PHN's key focus areas, which include:

- Aboriginal and Torres Strait Islander Social and Emotional Wellbeing
- Aged Care
- Alcohol and Other Drugs
- Digital Health
- Family, Domestic and Sexual Violence
- Health Workforce
- Integration
- Mental Health
- Population Health

Organisational suppliers

The remaining portion of procurement expenditure relates to goods and services that support Adelaide PHN's corporate and administrative operations. These suppliers are predominantly located in Australia, with limited engagement of international service providers (mainly software and technology).

Key organisational procurement categories include:

- Information and communication technology
- Professional consulting services
- Cleaning
- Catering
- Waste management
- Office furniture and supplies

Modern slavery risks

Adelaide PHN is committed to identifying, assessing and addressing modern slavery risks across its operations and supply chains. To support this commitment, a modern slavery assessment was completed for the FY2024–25 reporting period, overseen by the organisation’s Governance and Risk Manager.

Consistent with the United Nations Guiding Principles on Business and Human Rights (UNGPs), the assessment considered where Adelaide PHN may cause, contribute to, or be directly linked to modern slavery through its business activities and relationships.

The assessment examined Adelaide PHN’s operations and supply chains to identify and assess potential modern slavery risks. During the reporting period, approximately 93.4% of total expenditure related to Commissioned Service Providers (CSPs), with the remaining 6.6% attributed to organisational suppliers. Of this total expenditure, around 60% was analysed. The assessment identified potential areas of modern slavery risk in relation to:



High risk sectors



High risk geographies



Workforce practices



Governance systems

Operations

As an employer, Adelaide PHN recognises that its operations could cause modern slavery if employment practices failed to meet legal or ethical standards. However, the organisation’s direct employment model under the Fair Work Act 2009 (Cth), together with established workplace policies, means the risk of modern slavery within its operations is considered low. All employees are engaged directly under written contracts consistent with Australian workplace legislation and the organisation’s Enterprise Agreement, which defines pay scales, working hours, and entitlements. Recruitment is managed internally, without the use of labour-hire or recruitment agencies, and all employees have the legal right to work in Australia.

Adelaide PHN’s approach to ethical and fair employment is supported by the following policies:

- Recruitment Policy
- Code of Conduct
- Conflict of Interest Policy
- Whistleblower Policy

As part of the preparation of this Statement, Adelaide PHN also developed a Modern Slavery Policy to formalise its commitment to identifying, assessing and addressing modern slavery risks across its operations and supply chains.

Supply chains

Adelaide PHN recognises that it may contribute to, or be directly linked with, modern slavery through its procurement practices, particularly where suppliers operate in sectors with vulnerable workforces or source materials from countries where modern slavery is more prevalent. These risks can arise when visibility over employment practices in upstream supply chains is limited.

Using recognised tools and data sources, including the Walk Free Global Slavery Index and the Social Hotspot Database, Adelaide PHN assessed its key suppliers, including both Commissioned Service Providers (CSPs) and organisational suppliers.

The assessment found that potential risk is greatest among organisational suppliers, as some categories depend on goods or services with overseas manufacturing components. In particular, office furniture and information and communication technology (ICT) suppliers may source materials or products from countries with weaker labour protections and limited supply-chain transparency. Other procurement categories such as cleaning, catering, and waste management also present elevated inherent risks due to the presence of vulnerable or subcontracted workforces. Despite these inherent risks, Adelaide PHN's suppliers in these categories demonstrate compliant employment practice.

Commissioned Service Providers (CSPs) are considered low risk, overall. CSP procurement focuses on expertise and service quality, with most providers maintaining long-term relationships with Adelaide PHN, which supports visibility and accountability. While the sector may employ some vulnerable worker groups, Adelaide PHN's CSPs operate entirely within Australia under regulated employment conditions.

Adelaide PHN recognises however that, while CSPs operate within Australia and are subject to regulated employment conditions, modern slavery risks may arise within their upstream supply chains, including the procurement of goods, consumables and services (for example, medical supplies, equipment, technology, cleaning and catering services).

Adelaide PHN therefore expects CSPs to take reasonable steps to identify, manage and mitigate modern slavery risks within their own supply chains, proportionate to the nature, size and risk profile of their operations. This includes maintaining appropriate governance, policies and controls in relation to workforce practices, subcontracting and supplier arrangements.

CSPs are required to report on modern slavery risks and controls within their operations and supply chains through Adelaide PHN's Annual Assurance Statement process, including disclosure of any identified risks, incidents or remediation actions.

Adelaide PHN will use this information to inform its risk assessments, support continuous improvement, and provide assurance to the Board, funders and stakeholders regarding ethical commissioning and supply-chain integrity.

Actions taken to assess and address risks

Adelaide PHN recognises that addressing modern slavery risks requires a structured and ongoing approach. As this is the organisation's first reporting period under the Modern Slavery Act 2018 (Cth),

actions taken during the preparation of this Statement focused on strengthening effective governance and oversight of potential modern slavery risks.

Key actions completed included:

- Engaged 21 suppliers through a targeted questionnaire to gather information on potential modern slavery risks and identify actions being taken in Adelaide PHN's supply chains.
- Conducted a modern slavery risk assessment, overseen by the Governance and Risk Manager, with participation from the Procurement and Contracts Manager and People and Culture Manager.
- Developed a Modern Slavery Policy, in line with the Australian Government's Guidance for Reporting Entities, formalising Adelaide PHN's commitment to identifying, assessing and addressing modern slavery risks. The policy includes a "zero-tolerance for inaction" approach, encouraging suppliers to disclose risks or incidents without fear of automatic contract termination.

Continuous improvement

Adelaide PHN is committed to continuously strengthening its governance, awareness and due-diligence processes to address modern slavery risks. Over the next reporting period, the organisation will focus on:

- Delivering modern slavery awareness training for all new employees as part of the onboarding process.
- Providing annual refresher training for Procurement and Contracts staff, Corporate Services, People & Culture, Finance, Legal, and other relevant personnel.
- Integrating a standard supplier questionnaire into procurement processes to collect consistent information on workforce arrangements, subcontracting, recruitment practices, and governance maturity, applying it to all new and renewing suppliers.

Assessing effectiveness of actions

As this is Adelaide PHN's first Modern Slavery Statement, formal processes to measure the effectiveness of actions are still being developed. During the next reporting period, Adelaide PHN will expand its monitoring and review processes to evaluate how effectively modern slavery risks are being identified and managed.

Planned activities include:

- Revisiting the modern slavery risk assessment to measure progress and track any changes in risk compared with FY2024–25.
- Reviewing supplier engagement levels and expanding participation in future supplier questionnaires to strengthen visibility and understanding of risk across the supply chains.

- Monitoring implementation of the Modern Slavery Policy, staff training, and integration of modern slavery considerations into procurement and governance processes.
- Reporting outcomes and insights to the Governance and Remuneration Committee and the Board to support ongoing oversight.

Consultations

Adelaide PHN does not own or control any other entity.

Other information

Adelaide PHN considers that the responses given in this statement sufficiently address the criteria for content set out in the Modern Slavery Act 2018 (Cth).