

Modern Slavery Procedure

1.1 Purpose

This Modern Slavery Reporting Procedure:

- aligns with mobility’s commitment to upholding fundamental human rights and eliminating Modern Slavery from its operations.
- aims to guide all mobility staff in identifying and reporting any suspected cases of modern slavery within our operations, including facilities and community services, and in collaboration with other approved providers.

This document is be read in conjunction with the APM Modern Slavery Policy.

1.2 Scope

This procedure applies to all mobility staff. The main scope of this procedure is so staff:

- Recognise, escalate and report any modern slavery concern
- Be able to identify indicators such as individuals living at their workplace, unpaid or overworked individuals, debt-bondage situations, passport retention, centralized benefit payments, and signs of violence or abuse.

1.3 Definitions

Term	Description
Care Recipient	A person who is receiving care and services under a package funded by the Australian Government, under the <i>Aged Care Act 1997</i> ⁱ For the purposes of this procedure a care recipient is called a client.
Staff	Is defined to be an individual who is employed, hired, retained, or contracted by the approved provider (whether directly or through an employment or recruiting agency) to provide care or other services ⁱⁱ .
Human Rights	Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, sexuality or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education and many more. Everyone is entitled to these rights, without discrimination. ⁱⁱⁱ
Modern Slavery	It describes situations where coercion, threats or deception are used to exploit victims and undermine a person’s freedom. ^{iv}

1.4 Procedure

1.4.1 Identification of Modern Slavery

Be alert to signs of modern slavery, including but not limited to:

Indicators of Modern Slavery can include the following, so be alert if any mobility users inform you of the following:

- individuals living at the workplace of their employer, located in remote locations that are difficult to access;
- individuals not being paid for the work they undertake or required to work excessive hours;
- individuals being held in debt-bondage (being told they ‘still’ owe money after having paid off a previous debt);
- an individual’s passport being held by their ‘employer’ in order to keep the individual at work;
- multiple benefit claimants having their benefits being paid into the same account or a third party ‘holds’ or ‘invests’ their money for them;

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- an individual appears to be subjected to, or threatened with violence, emotional, sexual, verbal or physical abuse or other degrading treatment in connection with their work;
- an individual confirms they were forcibly married, and / or brought into the country against their will, or that their child is being kept from them to ensure they keep working.

1.4.2 Reporting

If you have any suspicions or concerns that any aspect of Modern Slavery may be occurring:

- Immediately report your concerns to the mobility office in mobility app and via phone call
- Provide as much detail as possible about the situation, including dates, locations, and any relevant information.
- Ensure confidentiality of information while reporting and avoid discussing the matter with unauthorized individuals.
- There will be no retaliation against individuals reporting in good faith, even if the suspicions are later found to be unfounded.
- It is not your role or responsibility to undertake investigations, form conclusions or to act against any person who you suspect of Modern Slavery activities.
- Once a report is made, an investigation will be undertaken in accordance with our Whistleblower Policy and Procedure.

Refer to Client Incident and Near Miss Management Procedure

1.4.3 Escalating and Investigation

Upon receiving a report, the Head of Care will review the details and initiate an investigation as necessary.

External Reporting: If deemed appropriate, reports may be escalated to relevant external authorities, such as law enforcement or regulatory bodies.

Whistleblower Protection: mobility is committed to protecting whistleblowers in accordance with relevant laws and regulations.

1.5 Related Documents

1.5.1 Internal Documents

- Code of Conduct
- Privacy Policy
- Client Incident and Near Miss Management Procedure
- APM Modern Slavery Policy
- Whistleblowing Policy and Procedure

1.5.2 External Documents

- Aged Care Act 1997

ⁱ Home Care Packages Program Operational Manual A guide for home care providers Version 1.4 August 2023 p 165

ⁱⁱ Schedule 1 of the Aged Care Act 1997 Cth

ⁱⁱⁱ Universal Declaration of Human Rights. (1948). Preamble & Articles 1-30. United Nations General Assembly. Retrieved from <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

^{iv} United Nations Guiding Principles on Business and Human Rights