



Managing Modern Slavery Risks Policy

Scope

This policy applies to Brook RED Community Members, Nominated Support People, Board Members, employees, volunteers, and students on placement.

Purpose

This policy informs how Brook RED will manage the risk of *modern slavery* in our operations and supply chains.

Principles

The health sector faces opportunities and challenges in relation to modern slavery, especially since the sector has experienced significant and rapid growth in recent years. Brook RED recognises the elevated risk of modern slavery within its operations and supply chains in terms of procurement of medical goods, operating activities, and frontline care. We wish to respond appropriately from a human rights perspective with a focus on minimising risk to people and reducing organisational exposure.

Policy

Brook RED will:

- Identify modern slavery risks which may include mapping our operations and supply chains and identifying and prioritising severe risks
- Take action to assess and address modern slavery risks and impacts
- Have an accessible and confidential grievance mechanism to elevate and address concerns and to act as an early warning system for modern slavery risks
- Work to ensure that our responses do not jeopardise the safety of victims
- Educate staff to be aware of modern slavery and managing risks
- Monitor and evaluate the effectiveness of our response
- Discuss modern slavery risk at the Board level
- Document risks in the Organisational Risk Register

Definitions of Terms Used

Modern Slavery

Modern slavery refers to a range of serious human rights violations, which are also crimes in Australia. The term is used to describe situations where coercion, threats, or deception are used to exploit people and deprive them of their freedom. Modern slavery includes trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services.

References

Modern Slavery Act 2018 (Cth)

Modern Slavery in the Health Services Sector, Human Rights Commission

Brook RED Organisational Risk Register

Brook RED Complaints Policy and Procedure

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Document Control and Record of Changes

Version	Effective Date	Approved by	Summary of Change	Date of Next Review
Version 01	December 2023	Eschleigh Balzamo	Introduction of new policy	September 2025
Version 01.01	September 2025	Blake Barber	Review	September 2026

The General Manager has overall responsibility for this policy. If there are any questions regarding this policy, please direct these to the Business Services Manager or General Manager.