



Australian Government

Office of
the Australian
Anti-Slavery
Commissioner

Building Australia's Ambition and Impact

Strengthening the response
to modern slavery

Strategic Plan 2025-2028



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Acknowledgments

Acknowledgement of Country

The Australian Anti-Slavery Commissioner's Office acknowledge Aboriginal and Torres Strait Islander peoples as Traditional Custodians of Australia and pay our respect to Elders, past and present. We acknowledge their ongoing connection to land, sea, and communities throughout Australia, and their contributions to the lives of all Australians.

The Commissioner's Office recognise the exploitation, including slavery and slavery-like practices, that were perpetrated against Aboriginal and Torres Strait Islander peoples in Australia. We recognise the ongoing impact the legacies of those practices have on First Nations peoples today.

Acknowledgment of people with lived experience of modern slavery

The Commissioner's Office acknowledges the diverse experiences and the expertise of people who have lived experienced of modern slavery. We extend our thanks to all people with lived experience who participated in our consultation process and to the lived experience experts who helped us create and conduct consultations. In particular, we acknowledge Moe Turaga who acted as Lived Experience Advisor in the development of this Strategic Plan. Your insights, and those of other survivors, have fundamentally shaped our priorities for the coming years.

We recognise the essential role of diverse lived experience and expertise in an effective modern slavery response. As such, we are committed to creating opportunities for people and leaders with lived experience to be a part of our work, including helping to assess our effectiveness in delivering on the objectives set out within this plan.

Acknowledgement of contributors

The Commissioner's Office also acknowledge those individuals and organisations who contributed to the process of developing the Strategic Plan through written submissions and/or consultations. We recognise your commitment to preventing and addressing these crimes, and supporting people who are affected by them. We are incredibly grateful to those who shared their expertise with us.

Through this collaborative process, we identified a range of actions that will be essential to strengthening Australia's response to modern slavery. The insights gained have helped create a framework for action as set out in this Strategic Plan, and will shape our annual work plans and reinforce our advocacy efforts in the years to come.

Attribution

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Help and support

Modern slavery refers to situations of serious exploitation where one person uses their power over another to control or use them for their own benefit. The term refers to crimes such as trafficking in persons, slavery and slavery-like practices, forced marriage, and the worst forms of child labour. Visit www.modernslavery.gov.au for more information.



Free assistance is available for any person experiencing, or at risk of, modern slavery. Free interpreter services are available to help any person communicate with service providers in their own language. Call the Translating and Interpreting Service on 131 450.

All calls are free and confidential.

If you or someone you know is not safe, or it is an emergency, phone Triple Zero (000) and ask to speak to the police. You can ask for an interpreter if you need one.

Help and support



The Salvation Army and specialist partner organisations can provide free and confidential support to help you understand your rights and options, offer free legal advice about your experience of modern slavery, help with your immediate needs, and refer you to the **Support for Trafficked People Program** (STPP) or the **Forced Marriage Specialist Support Program** (FMSSP) if eligible. For more information go to www.salvationarmy.org.au/additional-referral-pathway/ or call 1800 000 277. These services can also help you make a referral to law enforcement if you wish.



You can also make a report directly to the Australian Federal Police (AFP). The AFP can provide advice, undertake an investigation or refer you to other services, including the STPP or FMSSP. You can make a report by contacting 131 237 (131 AFP) or through the AFP website at https://forms.afp.gov.au/online_forms/human_trafficking_form.



Life Without Barriers is the organisation that delivers the Forced Marriage Specialist Support Program and provides individual needs-based support. If you are in, or at risk of, forced marriage, contact Life Without Barriers on 1800 403 213 or visit <https://www.lwb.org.au/services/forced-marriage-support/> to request confidential support.



More information on the STPP and FMSSP is available on the Department of Social Services Website: <https://www.dss.gov.au/human-trafficking-and-slavery>.



Anti-Slavery Australia provides free, confidential legal and migration services to people who have experienced, or are at risk of, modern slavery in Australia. Call (02) 9514 8115 (9am – 5pm AEST, Monday to Friday), or email ASALegal@uts.edu.au.



You can contact the New South Wales Anti-slavery Commissioner through the 1800 FREEDOM (1800 373 336) hotline or antislavery@dcj.nsw.gov.au to receive confidential advice and referral support from the NSW Anti-slavery Commissioner's team.



Visa holders and migrant workers have the same workplace entitlements and protections as all other employees in Australia, regardless of their migration status. Your rights can't be taken away by employment contract or agreement. The Fair Work Ombudsman can help if you or someone you know is worried about pay, conditions and rights. Any worker in Australia can contact the Fair Work Ombudsman directly on 13 13 94 or at <https://www.fairwork.gov.au/find-help-for/visa-holders-migrants>.

Foreword by the Anti-Slavery Commissioner



In developing a strategic plan, it is easy to get lost in the administrative process and lose sight of why you're doing this. If there was a danger of that, it quickly disappeared as I met with victims, survivors and people with lived experience of modern slavery, who courageously shared their personal and often painful

stories with my team and me. In hearing their accounts, it became clear that Australia can and must do better.

The contributions of survivors and the many people who generously shared their expertise through our public consultations have fundamentally shaped the contents of this plan. The core message we heard was the need for systemic change that drives real impact for the benefit of those at risk or victim survivors of modern slavery. That message resonates throughout our vision.

Modern slavery is not an issue that's confined to certain regions, it can and does happen everywhere, including here in Australia. In 2024, the Government announced that it would appoint Australia's inaugural Anti-Slavery Commissioner with the intention of providing an additional independent pillar to its modern slavery response. It is a privilege to take on this challenge and to harness the tremendous resolve that exists throughout the Australian community.

There is an enormous opportunity over the next three years to strengthen and direct the course of Australia's response to modern slavery. The development of a new national strategy on modern slavery and the proposed legislative reform of the Modern Slavery Act will be critical decision points that will determine the shape and success of Australia's efforts for years to come.

I see the Commissioner's role as one that provides leadership and drives ambition to address and prevent these crimes, and protect people who have been victimised. That means energising our community, building consensus and influencing key stakeholders to take meaningful action. In accordance with my legislative functions, I will support improved action by business, advocate to government, build collaboration and awareness, and promote partnership with victims, survivors and people with lived experience.

I am supported by an experienced and ambitious team. Together, we have leveraged the development of this Strategic Plan as an opportunity to engage extensively as a new office. We met with and heard from people with lived experience of modern slavery, civil society, lawyers, trade unions, service providers, business, investors, government, and other statutory office holders. I sincerely thank those individuals and organisations who engaged in the process.

These engagements generated valuable and comprehensive insights into what needs to happen for Australia to have a measurable impact in reducing modern slavery. We carried these insights into the development of this Strategic Plan, which establishes our objectives, initiatives and vision across four interconnected priorities:

1. Transforming systems to centre survivors and people with lived experience
2. Strengthening law and policy
3. Driving business and government towards better due diligence
4. Improving access to justice and remedy.

To bring this Strategic Plan to life, we need to act together. Critical to our success will be genuine partnership with the victim-survivors and dedicated individuals, organisations and businesses working to address modern slavery. We need to unite behind common goals and set out clear and feasible policy options for decision-makers.

Only by working together can we accelerate action to deliver better outcomes for people who experience vulnerability.

A handwritten signature in blue ink, appearing to read 'Chris Evans'.

Chris Evans
Australian Anti-Slavery Commissioner
September 2025

Foreword by Survivor Leader Moe Turaga



When I look at this Strategic Plan, I do not see just words on paper. I see lives—lives like mine, lives of those who have been silenced, and lives of those who are still waiting to be heard. Often, as survivors of slavery and exploitation we are spoken about, rather than spoken with. This plan begins to change that.

This plan is more than a document of policies and objectives, it is a reflection of our voices once silenced. It makes space for people with lived experience to be at the centre.

For those of us who have lived through the realities of exploitation, slavery is not a historical relic—but an experience etched into our memory, our body and spirit. The loss of our freedom, dignity and hope has become the seedbed of our resilience and drive to create change so that others don't have to endure what we have endured.

In shaping this Strategic Plan, the inclusion of People with Lived Experience has been important. My experience is that we're not merely subjects, but architects and guardians of this plan. As Survivor Alliance says, "nothing about us, without us can ever lead to freedom."

Our stories do not serve to shock, but to help guide and illuminate where exploitation happens. Our Lived Experience is not just a story to be displayed; it is wisdom to be trusted. It is the knowledge of what exploitation feels like, how it hides, and where systems fail. And it is also the knowledge of what freedom, dignity, and justice truly require. As I have said before: "True Freedom is measured not by the absence of chains, but by the strength we find in standing together and lifting each other out of oppression."

We don't only bring with us pain, but also knowledge. Knowledge of how systems can change for the better, how justice can be made real and where exploitation thrives. For me the inclusion of People with Lived Experiences voices in this Strategic Plan is more than consultation—it is partnership. It ensures that prevention is grounded in truth, that protection is shaped by dignity, and that remedies reflect real pathways to healing.

Survivors are not problems to be solved; we are partners in designing solutions that work. Prevention requires awareness, Protection demands Dignity and Partnerships builds change. Freedom is not theoretical to us—it is personal. It is something we fight for, reclaim, and defend every day. "Freedom is not given—it is restored, reclaimed, and defended by those who refuse to be silent." These words are not only my own reflection but the heartbeat of this plan.

The Commissioner's commitment to embedding lived experience leadership is a powerful step towards a future where Australia does not just acknowledge any form of slavery, but actively dismantles it. Yet this must be more than the start of a conversation—it must be the beginning of a long journey of shared responsibility.

And so, my call to action is clear: to government, to business, to civil society, and to communities—you must not only open the door to survivor voices, you must walk beside us. Include us in decisions, honour our leadership, and act with the urgency that freedom demands. Only then will this plan become more than strategy. It will become justice lived out.

The Commissioner's Plan is a commitment to transform words into action, and a blueprint for a nation where any form of slavery is not tolerated.

I offer this foreword as testimony that lived experience is not only memory of the past, but a compass for the future. May this plan continue to honour the voices of survivors, amplify their leadership, and guide Australia towards a nation where slavery in all its forms is never tolerated.

Moe Turaga

Lived Experience Leader and Advocate
September 2025

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Strategic Plan Overview

Transforming systems to centre survivors and people with lived experience	Strengthening law and policy	Driving business and government towards better due diligence	Improving access to justice and remedy
Objectives:			
Promote systems that embed survivor leadership, ensuring services, programs and policy are shaped by lived experience and strengthened through survivor co-design and leadership pathways. Make practical guidance material available to survivors of modern slavery.	Identify opportunities to strengthen law and policy and advocate for more effective responses to modern slavery that are informed by lived experience.	Support entities to take effective action to identify and address risks of modern slavery in their operations and supply chains.	Advocate for a proactive and evidence-based approach to identifying victim-survivors and connecting them to meaningful justice and remedy.
Initiatives:			
1. Promote consistent and sustainable approaches to survivor leadership and capability development 2. Advocate for a need-based approach to survivor support programs 3. Improve and extend guidance material to support victim-survivors of modern slavery	1. Advance a coordinated and survivor-informed national agenda to strengthen law and policy responses to modern slavery 2. Advocate for reform of the Modern Slavery Act that requires effective action by reporting entities and drives positive outcomes for people 3. Promote policies to prevent exploitation and protect populations at risk 4. Support coordinated research and data collection efforts to guide policy-making.	1. Build business commitment to effective due diligence in supply chains 2. Promote better regulatory support for business to prevent importing goods suspected of being produced with forced labour 3. Advocate for stronger government procurement policies and processes 4. Encourage and enable collaboration within and across sectors	1. Collaborate with diverse stakeholders to improve the detection of people experiencing modern slavery 2. Advocate for stronger criminal justice responses to slavery and trafficking 3. Promote pathways and support for survivors and workers to reclaim dignity and access meaningful remedies
Vision:			
Survivors inform and shape strategy, law and policy, and can access sustainable leadership pathways. Victims and survivors of modern slavery in Australia receive appropriate, needs-based support.	Australia models a leading law and policy framework, grounded in evidence, that prevents exploitation and protects people from all forms of modern slavery.	Business, government and other entities take effective action to create fair, safe and dignified working conditions in their operations and supply chains.	Survivors of slavery in Australia are able to access justice and remedy that is meaningful, timely and dignified.

Introduction

About modern slavery

Modern slavery in this document refers to serious situations of exploitation criminalised by Divisions 270 and 271 of *Australia's Criminal Code Act 1995* (Cth), including human trafficking, slavery, and slavery-like practices such as servitude, forced labour, deceptive recruiting, debt bondage and forced marriage.

Although it is generally used as an umbrella term, it is important to note that 'modern slavery' encompasses various forms of exploitation that may manifest in different ways, requiring nuanced understanding and responses from service providers, officials, and in the legal and policy framework.

"There's still a major lack of understanding about what modern slavery and trafficking look[s] like in Australia. Many people think it only happens overseas or in extreme cases."

Survivor feedback, Lived experienced targeted consultation, May to June 2025.

Modern slavery in Australia

Prevalence estimates of modern slavery in Australia vary widely. In 2019, the Australian Institute of Criminology estimated there were between 1300-1900 people living in modern slavery in Australia between 2015-2017.¹ Using a different methodology, the Global Slavery Index put that number much higher, estimating that in 2021 there were 41,000 people in modern slavery in Australia. As quoted by the Minister at *Modern Slavery Act amendment's* second reading, "we know measuring the true extent of modern slavery crimes is significantly challenging and changing. Crimes are often clandestine, sophisticated, and underreported."²

Regardless of the precise estimate, it is clear the number of victim-survivors being detected is far lower than those who are experiencing them. The most recently available data indicates 382 reports of slavery and trafficking crimes to the Australian Federal Police in the 2023-2024 financial year, including offences of human trafficking, forced marriage, forced labour, sexual exploitation, domestic servitude, debt bondage, deceptive recruitment, slavery, harbouring, and organ trafficking.³ The Australian Institute of Criminology has estimated that for every one victim identified, four remain undetected.⁴

Low levels of detection, combined with a lack of current and publicly available data on investigations, prosecutions and case outcomes, makes it difficult to grasp the nature and potential scale of modern slavery in Australia. The lack of visibility is mirrored by low awareness in the community - including among people who may be at risk of experiencing these crimes.

Anyone can be at risk of experiencing modern slavery. It is not a crime that is confined to certain regions or communities. However, the risk of experiencing serious forms of exploitation may depend on a number of factors. Gender, age, disability status, race, ethnicity, cultural and familial background, language, and economic background can influence the level of risk to experiencing forms of modern slavery. Risks may be greater when individuals are impacted by migration policies and visa status, societal attitudes and biases, labour laws and (lack of) worker protection policies, opaque supply chains, or unscrupulous recruitment practices. Other factors that can increase risk include isolated working conditions, employment power imbalances, and an absence of support networks.



Photo: Ashley Mar

Modern slavery in global supply chains

There are an estimated 27.6 million people in forced labour globally, with two thirds of people in forced labour in our Asia-Pacific region.⁵ Australian businesses, government agencies, and other entities are highly exposed to modern slavery through their supply chains. Entities risk being associated with exploitative practices such as forced labour, debt bondage, and deceptive recruitment through the production of their goods and services, both in Australia and overseas.

“Modern slavery sits at the extreme end of a spectrum of exploitation. Temporary migrant workers in Australia are highly vulnerable to modern slavery due to visa conditions that place them at risk of exploitation and precarity.”

Australian Council of Trade Unions, written submission.

Risks of modern slavery in the supply chain are heightened where suppliers operate or procure from countries lacking labour rights and protections, or where state-sanctioned forced labour exists. In a globalised economy with multiple layers of suppliers and subcontractors, many entities still do not have clear visibility of where exactly people could be at risk of experiencing modern slavery within their supply chain.

“Our interconnected world has increased the risk of exploitation throughout global supply chains. High-risk industries must be disrupted, and vulnerable workers must be safeguarded from exploitation and able to access remedies where prevention efforts fail.”

Walk Free, written submission.

About the Anti-Slavery Commissioner's Office

The Australian Anti-Slavery Commissioner's Office is strengthening Australia's response to modern slavery, because all people deserve to live and work in freedom and dignity.

We provide leadership – building a united vision for the anti-slavery sector and business to work towards. We take a system-wide view of modern slavery to identify priorities, while bringing people together to innovate and collaborate.

We advocate fiercely and independently – championing the rights and dignity of victims and survivors. We agitate for legislative reform to facilitate more effective responses to modern slavery and consistent justice pathways and ensure that lived experience is at the centre of policy and programs.

We drive accountability – raising ambition across government, business and the community to address modern slavery, within Australia and our global supply chains. We want compliance with the Modern Slavery Act and to create impact that improves the lives of those at risk.

The Australian Anti-Slavery Commissioner was appointed by the Governor-General in 2024 under the *Modern Slavery Act 2018* (Cth) as an independent statutory office holder. The Commissioner exercises a range of functions as set out in 20C of the Act, which are distinct from the law enforcement, service delivery or international engagement functions carried out by Commonwealth Departments. The Commissioner's functions include:

- Supporting Australian entities to address the risks of modern slavery in their operations and supply chains, and promoting compliance with the Act;
- Engaging people with lived experience of modern slavery to inform policy design, and raise awareness of available resources and services;
- Promoting collaboration within and across sectors, and liaising with all stakeholders, organisations and governments on relevant issues;
- Advocating and providing advice to the Commonwealth and the Minister;
- Supporting research and awareness-raising initiatives.

We believe that by raising our collective ambition, we can make Australia a global leader in the fight against modern slavery. This means working with all sections of the community to build bold, coordinated action, strong accountability, and a system that truly centres survivors. Together we can help build a future where freedom and dignity are a lived reality for all.

About the Strategic Plan

This Strategic Plan establishes the framework for the work of the Commissioner's Office between 1 July 2025 and 30 June 2028. It sets out four strategic priorities, each with a corresponding objective, set of initiatives, and intended outcomes and impact.

The Strategic Plan, developed between April and June 2025, draws on insights from submissions and consultations. The Office consulted with people with lived experience, business, civil society, government, academia and other stakeholders with diverse expertise across Australia's anti-slavery movement.

The Plan is aligned with the Commissioner's statutory functions set out in the Act and underpinned by a theory of change. The theory of change connects our planned activities to the intended short and long-term outcomes we seek to achieve. This connection between action and impact, along with consultation input, has guided our decisions on the allocation of the Commissioner's resources over the next three years of the Office's operation.

+250

Stakeholders (individuals and organisations) participated in consultations in total.

94

Written submissions from stakeholders.

126

In-person and virtual consultation participants.

34

Lived Experience targeted consultation participants

- Civil society - 67
- Academia - 19
- Business (individual) - 61
- Business (group) - 20
- Government - 11
- Individual - 52
- Advisory - 24



Developing the Strategic Plan

Overarching approach

- Invited submissions, asking stakeholders to identify key priorities, objectives, activities and measures of success.
- Coded and analysed submissions using qualitative data software to identify key themes.
- Developed a theory of change to underpin the ambitions and work of the Commissioner.
- Identified draft priorities to validate with stakeholders.
- Conducted five stakeholder consultation sessions: two in Sydney, one in Melbourne and two online.
- Conducted targeted consultations with industry associations.
- Conducted targeted consultations with people with lived experience.
- Developed the Strategic Plan by bringing together insights from all consultations and guided by our theory of change

Principles of consultation

- Safe and inclusive
- Respectful of privacy
- Interactive

In-person and virtual consultations

Prior to the consultation sessions, participants were provided with a one-page summary outlining five draft priorities and objectives that had emerged from the theory of change process and the analysis of written submissions.

During the sessions, participants engaged in interactive working sessions on priority areas, where feedback and ideas were captured.

The sessions also incorporated a plenary discussion where all participants were invited to share their views and reflections on the draft priority areas, objectives and potential activities.

Targeted lived experience consultations

We conducted targeted consultations with 34 participants with lived experience of modern slavery and the impacts of modern slavery policy across multiple sessions held between May to June 2025. Participants were engaged directly and in partnership with NGOs and peer organisations that work with and support survivors of modern slavery in Australia. Most participants contributed through one-on-one conversations with the Office. Nine participants engaged across two focus groups, and five participants provided written inputs through an online survey. All participants were remunerated for their time, and any quotes directly referenced have been attributed in accordance with authors' preferences.

The targeted consultations were carefully designed with survivor advocates—Moe Turaga, Matilda Constable-Webb and Bibi Goul Mossavi—with additional advice and guidance from Sarah S, whose time was generously supported by the Office of the NSW Anti-Slavery Commissioner, Dr James Cockayne. This collaborative, partnership-based approach reflects our commitment to building a survivor-centred system, underpinned by evidence-based policy and practice.

Priorities

1. Transforming systems to centre survivors and people with lived experience
2. Strengthening law and policy
3. Driving business and government towards better due diligence
4. Improving access to justice and remedy

Transforming systems to centre survivors and people with lived experience

“Survivor-led” must go beyond “survivor-informed.” True leadership means including people with lived experience in co-designing and co-driving strategies through paid advisory roles, leadership pathways, and the power to independently publish contributions.”

Sherry Wanjiru, Research Assistant - Lived Experience, Fair Futures Submission



Key objectives

Promote systems that embed survivor leadership, ensuring services, programs and policy are shaped by lived experience and strengthened through survivor co-design and leadership pathways.

Make practical guidance material available to support survivors of modern slavery.

Introduction

There have been significant advances in both survivor support services and survivor voice initiatives in recent years. For example, the newly established Forced Marriage Specialist Support Program⁶ and the pilot Additional Referral Pathway⁷ all aim to strengthen survivors' access to relevant information and appropriate support services. These programs are demonstrating early success in early intervention, victim identification and widening access to support. Survivor engagement and leadership has been advanced through initiatives such as the Lived Experience Engagement Program and associated Survivor Advisory Council,⁸ and guidance on engagement and empowerment⁹ issued by the government. Beyond government initiatives, civil society has worked for two decades supporting survivors, advocating for their rights, and working hand-in-hand to elevate their voices. We also recognise the courageous and trailblazing contributions of survivor leaders themselves.

Despite these advances, the overall system of support available for survivors remains inconsistent and inaccessible – particularly for children and those with highly complex needs. Structures for survivor voice and leadership are not embedded across law and policy decision-making. Many of the available supports and structures are also not sustainably funded. These limitations were consistently emphasised throughout stakeholder consultations.

“[W]e can actually lead, we have skills and capabilities we can realise. We can advocate on our own. Not just within a system, it is letting us step up and helping us realise what we can do. That’s how we get out of the cycle.”

Sarah Nelson, In-person consultation, May 2025.

Consultation insights

Throughout the consultation process, stakeholders highlighted the importance of embedding survivor-centred principles and survivor voice and leadership across all modern slavery reforms and initiatives, including the work of the Commissioner’s Office.

Survivors and civil society allies emphasised the challenges of accessing justice and support in both the targeted lived experience consultations and the open consultation sessions. We heard that the current system of social and legal support available to survivors and populations at risk is inadequately resourced, overly-connected to criminal justice outcomes and accessed by only a small proportion of people who experience modern slavery. Stakeholders emphasised the need to strengthen victim identification and engagement by first responders and to remove barriers to accessing support and justice. These barriers include limited language access, and awareness of rights; misconceptions about how “real victims” look and behave; and the criminalisation of survivors.

“All of the things that make us the “wrong” or “bad” victim for services or justice processes, make us the “perfect victim” for the perpetrator. They know who is unlikely to be believed or helped, which gives them even more power.”

Sarah S., Survivor Advocate.

“So, I lived all the time in fear of being homeless. Because in the refuge I used to live, they kept telling me that it was only temporary, that women would be there just for a couple weeks ... that would cause me a lot of anxiety and stress because I didn’t know when they were going to ask me to leave the service.”

Person with Lived Experience, Lived experienced targeted consultation, May to June 2025.

The unavailability of needs-based support, including housing, affordable legal advice and advocacy, whole-of-family care and complex needs were all stressed as significant gaps in the current service model, leaving some survivors in exploitative conditions or at risk of re-exploitation.

Stakeholders consistently emphasised the need to establish structured, sustainable models for survivor engagement and leadership, where people with lived experience can lead and meaningfully contribute to decisions and processes that affect them. Highlighting the principles of independence and accountability, survivors proposed the Victorian Victim-Survivor Advisory Council and the US Advisory Council on Human Trafficking as models for what should be developed in Australia.

“I talked to Legal Aid and they gave me a list of lawyers and I talked to each and every lawyer and everyone was like you have to pay [thousands] for one court visit. I don’t think this is possible for people who just came out of that situation.”

RKS, Lived experience targeted consultation, May to June 2025

Crucially, survivors deserve opportunities to engage in ways that best suit them as individuals. We heard that structures should therefore provide a suite of options, ranging from consultation, to written input, to public leadership. Stakeholders also spoke of the importance of co-design, appropriate recognition for survivor contributions and leadership (including through financial compensation) and meaningful participation in measuring the impact of laws, policies and programs.

“What would really empower me is knowing my voice is being taken seriously and that it’s helping shape real change. Clear communication, flexibility, and a respectful environment go a long way in helping people like me stay involved.”

Survivor feedback, Lived experience targeted consultations, May to June 2025.



Photo: OAASC

Advancing this priority

Initiatives

1. Promote consistent and sustainable approaches to survivor leadership

We will work with survivors to identify and promote models of lived experience leadership that ensure survivors can influence and lead anti-slavery law and policy reform.

2. Advocate for a need-based approach to survivor support programs

We will champion a nationally-consistent support framework that is responsive to the unique needs of diverse victim-survivors and prioritises recovery and protection over a victim's ability to participate in criminal justice processes.

3. Improve and extend guidance material to support victim-survivors of modern slavery

We will partner with survivors, government, civil society and other stakeholders to amplify awareness of and access to useful guidance materials to support victim-survivors of modern slavery.

Intended outcomes

Sustainable models for survivor leadership are embedded across government, enabling survivors to meaningfully guide reform.

Victim-survivors of modern slavery can access clear, relevant information and guidance about their rights, supports and services.

Our vision for long-term impact

Survivors inform and shape strategy, law and policy, and can access sustainable leadership pathways.

Victims and survivors of modern slavery receive appropriate, needs-based support.

“That lack of identification really early on from those support services had a big impact on me being able to then appropriately get the right support in place ... I think possibly I don't present necessarily as to what someone might think of as a survivor of modern slavery, but I definitely didn't get picked up by those services.”

Matilda Constable-Webb, Lived experience targeted consultation, May to June 2025

Strengthening law and policy

The Commissioner should be “an active voice in strengthening Australia’s regulatory response to modern slavery in an international context; encouraging Australia not to fall behind other jurisdictions.”

Ausbil Investment Management Limited, written submission.

Key objectives

Identify opportunities to strengthen law and policy and advocate for more effective responses to modern slavery that are informed by lived experience.

Introduction

In 2023, an independent statutory review of the Act confirmed the widely-held view that Australia's reporting legislation, the *Modern Slavery Act 2018*, had not resulted in any meaningful change for people affected by modern slavery. The review made 30 recommendations to strengthen modern slavery obligations for reporting entities, including the introduction of a positive requirement to conduct due diligence.¹⁰ With other jurisdictions moving to "duty to act" models – and Australian entities operating in these countries already captured by these requirements – many agree that Australia's *Modern Slavery Act* must incorporate similar due diligence requirements. Other recommendations in the statutory review included introducing penalties for non-compliance and making declarations of products etc.¹ deemed to carry a high-risk of modern slavery. In December 2024, the Australian Government responded to the review, agreeing, or agreeing in principle to 25 of the 30 recommendations,¹¹ and in July 2025 launched the consultation process for reform.¹²

Setting the strategic framework for Australia's overall response to modern slavery, the National Action Plan to Combat Modern Slavery 2020-2025 establishes Commonwealth Agency responsibilities to deliver on key initiatives including service delivery, community-based projects, and data collection efforts.¹³ The next chapter for Australia's strategy on modern slavery is due to be developed, presenting a pivotal opportunity to influence our national approach for the next five years. State and Territory governments must be effectively involved in this process to ensure the development of a unified and comprehensive strategy to address modern slavery.

Other gaps persist in Australia's law and policy framework that unintentionally place people at risk of modern slavery. For example, certain visa conditions have been criticised for increasing the vulnerability to forms of modern slavery, and regulation on labour hire licensing remains inconsistent between states, putting workers at risk of exploitation at the hands of unscrupulous employers. Effective law and policy solutions require an understanding of how and why modern slavery manifests through annual, standardised data collection and reporting. Notable efforts have been made through the Human Trafficking and Modern Slavery National Minimum Dataset pilot, however, the most recent data is from July-December 2022, leaving fragmented visibility of the problem and national efforts to address it.¹⁴

Consultation insights

Throughout the consultation process, stakeholders acknowledged the progress in Australia's modern slavery response while emphasising that gaps remain in our legislative and policy framework. These gaps ultimately leave people vulnerable to exploitation both in Australia and within the supply chains of Australian business. Stakeholders emphasised a role for the Commissioner in urging the government to strengthen the *Modern Slavery Act* in line with the recommendations of the independent review. Repeatedly, we heard the call to build momentum behind introducing a mandatory requirement for reporting entities to undertake due diligence.

“Engaging with the Commonwealth to advocate for mandatory human rights due diligence or, alternatively, a standard of modern slavery due diligence.”

Fortescue, written submission.

Stakeholders from all sectors recommended the Commissioner build momentum for change through his collaboration, engagement and advocacy functions. Suggestions for the Commissioner's role included:

1 Recommendation 27 recommends that the *Modern Slavery Act* be amended to provide that “the Minister or the Anti-Slavery Commissioner may make a written declaration of a region, location, industry, product, supplier or supply chain that is regarded as carrying a high modern slavery risk”

“Advocacy to Government on strengthening Australia’s legal framework for addressing modern slavery and other human rights abuses in the operations and supply chains of Australian businesses.”

Human Rights Law Centre, written submission.

A lack of coordination between the Commonwealth and State/Territory governments was also highlighted as a key gap in the current response, and an area where the Commissioner could encourage greater collaboration.

“Current arrangements hamper efforts to involve State and Territory actors, despite their critical roles in preventing exploitation, providing victim support, and enforcing laws through frontline agencies. To ensure the next NAP is nationally effective, it must be developed as a true collaboration between the Commonwealth and the States and Territories. The Australian Commissioner could play a key role in advocating for such an approach.”

The Office of the NSW Anti-slavery Commissioner, written submission.

Other recommended areas for the Commissioner’s advocacy efforts included establishing a national labour hire licensing scheme, implementing a mechanism to regulate high-risk goods entering Australia, and tailoring interventions to address the unique aspects of different modern slavery crimes. Stakeholders stressed that law and policy reforms must be evidence-based, aligned with recognised best practice, and informed and led by lived experience.

“The Commissioner should support replacing the current fragmented approach to labour hire licensing and regulation – where only some states, such as Victoria, have regulatory frameworks, while others, like NSW, do not – with a nationwide framework for licensing and regulation of labour hire companies.”

Immigration Advice & Rights Centre, written submission.

Advancing this priority

Initiatives

1. Advance a coordinated and survivor-informed national agenda to strengthen law and policy responses to modern slavery

We will work with stakeholders to advocate for mechanisms that promote better transparency, cooperation, and accountability, including through the development of the government's future strategic framework.

2. Advocate for reform of the Modern Slavery Act that requires effective action by reporting entities and drives positive outcomes for people

We will support efforts to strengthen the Modern Slavery Act, including by advocating for the introduction of a due diligence obligation.

3. Promote policies to prevent exploitation and protect populations at risk

We will identify and advocate for evidence-based laws and policies that aim to prevent exploitation and protect populations at risk, including national protections for at-risk migrant workers and targeted responses that address different forms of modern slavery.

4. Support coordinated research and data collection efforts to guide policy-making

We will promote research efforts and call for a consistent data collection framework to ensure law and policy responses are grounded in evidence and best-practice.

Intended outcomes

The Modern Slavery Act is amended to include a requirement for reporting entities to undertake due diligence.

Law and policy makers in Australia draw on data, evidence and best practice to develop and reform systems to protect populations at risk.

Australia's modern slavery response is enhanced with additional or reformed law and policy measures that address risk factors and different forms of exploitation.

Our vision for long-term impact

Australia models a leading law and policy framework, grounded in evidence, that prevents exploitation and protects people from all forms of modern slavery.



Photo: Tony Rosier

Driving business and government towards better due diligence

“To show they’re making a real difference, companies should share, I think, real stories of how they’ve helped workers or improved their conditions. For examples, they could talk about how they raised wages for underpaid workers, or improved safety in their factories. And then it’s also important for companies to be honest about their challenges.”

Former client of Support for Trafficked People Program,
as quoted in Australian Red Cross, written submission.

Key objectives

Support entities to take effective action to identify and address risks of modern slavery in their operations and supply chains.

Introduction

Effective action from businesses, governments, and other entities is critical to address the use of modern slavery, including forced labour, debt bondage, and other slavery-like practices, within their operations and supply chains. Since Australia's Modern Slavery Act took effect, over 13,500 statements have been submitted outlining efforts to identify and address modern slavery risks.¹⁵ The reporting requirement has led to greater awareness of modern slavery risks within many Australian businesses and government agencies, however, evidence to date suggests inconsistent progress in company reporting and a lag in effective disclosure on modern slavery risks. The independent statutory review of the Act identified common weaknesses in managing and reporting on modern slavery from numerous research papers, including:

- “failing to address known modern slavery risks and products;
- failing to describe modern slavery risks beyond Tier 1 of supply chains;
- providing only a basic or unclear description of modern slavery risks;
- giving an inadequate explanation of risk assessment methods and grievance mechanisms; and
- not consulting with civil society groups in modern slavery risk assessment.”¹⁶

These mixed results give rise to questions as to whether the Act alone has been an effective mechanism to drive widespread change in business behaviour that actually benefits the people experiencing or at-risk of experiencing harm. As discussed in the previous section, the independent review of the Act made a number of recommendations that, if implemented, would shift the dial on modern slavery risk management. Two key recommendations were to establish a requirement for entities to conduct due diligence and the introduction of a mechanism for declaring products that are regarded as carrying a high modern slavery risk.¹⁷ Such reforms would support and encourage businesses and other reporting entities to more effectively identify, assess and respond to modern slavery risks.

Consultation insights

We heard from over 80 businesses while developing this plan, who expressed enthusiasm and commitment for taking practical action to prevent and address harm to people experiencing or at risk of modern slavery.

Discussions included the challenges that businesses face to implement due diligence systems and comply with their transparency obligations, including the complexity of identifying modern slavery at lower supply chain tiers, legal impediments to collaboration and disclosure, limited understanding of effective remediation practices, and difficulties in measuring the impact of their actions.

“Modern slavery and worker exploitation is not a challenge unique to any one business. Instead, it is a very complex challenge to which we are all exposed. There would be immeasurable benefits from being able to collaborate.”

Woolworths Group, written submission.

Stakeholders emphasised the limitations of the current regulatory framework to drive meaningful change in business behaviour and that without clearer regulatory guidance, progress is likely to continue to stall. Stakeholders also noted the danger of transparency obligations becoming a mere compliance exercise, as well as the practice of larger companies pushing the responsibility down onto small and medium enterprises, many of which lack the resources to effectively respond to compliance requests. There is a clear need to re-focus the discussion back on meaningful action to identify, address and prevent harm.

“Too many reporting entities have gotten into a pattern of superficial risk assessments and are not engaged in targeting their resources into the areas of highest risk in their supply chains.”

Uniting Church in Australia, Synod of Victoria and Tasmania, written submission.

Businesses and peak bodies have also called for greater guidance to identify goods that are deemed high risk of being produced with modern slavery to assist their compliance with the Modern Slavery Act. The need for a formal mechanism to support business action was a common theme across both the written and in-person consultations.

“As recommended by the McMillan Review, the Commissioner should issue written declarations identifying specific regions, locations, industries, products, suppliers, or supply chains that are regarded as carrying a high modern slavery risks... This would support due diligence on existing supply chains in accordance with the Act, as well as help inform decisions for organisations prior to entering into new supplier arrangements - particularly where the degree of risk may be less well understood.”

Australian Institute of Company Directors, written submission.

Stakeholders also highlighted the significant role of the Government as procurer, suggesting that it could model better practice by improving and making public its own procurement policies and practices.

No business, organisation or government procurement wants to knowingly source products or services made with forced labour. Stakeholders advocated for the Office to support entities of all sizes to more effectively identify, prevent and remediate instances of harm by promoting guidance on how to address systemic supply chain challenges, facilitating collaboration within and across sectors, focusing attention on higher-risk sectors and products, engaging senior leaders and encouraging action with impact. Ensuring entities have the right tools, resources and enabling environment will be a focus of the Office.

“The Australian Anti-Slavery Commissioner will need to advocate for public procurement practices that assess, address and mitigate the risks of modern slavery in operations and supply chains.”

Domus 8.7 and Australian Catholic Anti-Slavery Network, written submission.



Photo: KPMG

Advancing this priority

Initiatives

1. Build business commitment to effective due diligence in supply chains

We will engage with reporting entities to increase action and ambition by adopting effective due diligence processes. This includes improving business compliance with the Act, building capability through targeted and practical resources, and encouraging business leadership in responding to modern slavery risks.

2. Promote better regulatory support for business to prevent importing goods suspected of being produced with forced labour

We will promote measures that support business entities to identify high risk goods and advocate for regulatory and transparency measures that assist business to eliminate the importation of goods made with forced labour.

3. Advocate for stronger government procurement policies and processes

We will engage with government to enhance current approaches to identifying and managing modern slavery risks in government supply chains, prioritising Commonwealth processes.

4. Encourage and enable collaboration within and across sectors

We will work across government and industry to foster an enabling environment for business to collaborate on efforts to combat modern slavery.

Intended outcomes

Businesses are supported and encouraged to enhance capability in identifying, assessing, addressing and remediating modern slavery risks in operations and supply chains.

Commonwealth agencies take steps to model and lead on better practice approaches to identifying and addressing modern slavery risks within government supply chains.

Government, industry, and other stakeholders are empowered to collaborate to combat modern slavery.

Our vision for long-term impact

Business, government and other entities take effective action to create fair, safe and dignified working conditions in their operations and supply chains.

Improving access to justice and remedy

“If there was a hope that I would get justice in a short span of time, if I would have got financial support until my case is being heard and it would not have affected a new job, then I would have considered reporting. My biggest barrier was my visa and my bills and no hopes from the justice system. All these things can be improved.”

Survivor feedback, Lived experience targeted consultation,
May to June 2025

Key objectives

Advocate for a proactive and evidence-based approach to identifying victim-survivors and connecting them to meaningful justice and remedy.

Introduction

Justice and remedy are essential components of a comprehensive response to modern slavery. The National Action Plan to Combat Modern Slavery 2020-2025 set out five actions that are directly relevant to enhancing access to justice and remedy, including supporting business to improve remediation pathways and conducting separate reviews into modern slavery offences in legislation, available remedies for survivors, and existing and potential frameworks. Though these actions have been progressed, concrete policy outcomes and impacts for survivors remain unclear.

Notions of meaningful justice and remedy are not uniform. Ensuring access to both requires a nuanced understanding of and respect for individual views of victim-survivors and a willingness to extend our view beyond the status quo.¹⁸ Meaningful access to justice and remedy also depends, quite critically, on victim identification and crisis support to safely leave exploitative and re-establish personal agency. Notable progress has been made through initiatives such as the pilot Additional Referral Pathway Program and the Forced Marriage Specialist Support Program. Both initiatives allow service providers to directly assist victim-survivors when do not wish to immediately involve law enforcement. While these are important improvements, progress demands more proactive community engagement, at scale, and direct victim outreach.

Another challenge to justice and remedy is the high rate of attrition from the point of identification to successful conviction. While prosecution numbers are generally low globally, Australia's prosecution rate is comparatively low, with only 30 individuals convicted in twenty years. The Australian Institute of Criminology's examination of attrition rates for modern slavery cases¹⁹ identified several challenges related to victim identification and cooperation, difficulties associated with evidence, complex legislation, and insufficient training for investigators and prosecutors. Low rates of prosecution and conviction²⁰ severely limit victims' access to justice, such as procedural justice²¹ and court-ordered reparations. This leaves many victim-survivors without formal recognition of the harm they have suffered and enables perpetrators to offend – and possibly reoffend – with impunity. There is also limited use of alternative legislation to hold perpetrators to account when evidence does not meet the comparatively high threshold for slavery and trafficking crimes. Civil proceedings remain prohibitively complex and expensive, creating further barriers to accessing compensation and redress.

Consultation insights

Stakeholders emphasised the importance of a broad approach to justice and remedy that provides and promotes various pathways, including beyond the criminal justice system.

“Justice and remedy can look different to different people, [it’s] important to take broader focus.”

In-person consultation session,
Melbourne, May 2025.

Throughout submissions, there was strong support for a federal compensation scheme for victim-survivors, as well as expanded pathways to pursue employment and wage claims and non-financial remedies, such as education and migration relief. Stakeholders, including survivors, stressed the importance of ensuring ongoing support services for victim-survivors while pursuing justice as well as opportunities for business to facilitate remediation pathways.

As discussed in the previous section, stakeholders recognised the under-detection of victim-survivors as a critical barrier in accessing justice and remedy. Numerous stakeholders described challenges in the effective identification of vulnerable groups, particularly children, women and temporary migrant workers, noting that awareness of and trust in systems was critical to facilitating access. Survivors reported numerous challenges when attempting to report their cases, which prevented them from accessing justice and in many cases, exacerbated trauma and created financial hardship.

To address gaps in detection, stakeholders stressed the need for targeted and consistent training for first responders—particularly healthcare workers and state police—on recognising and supporting victims. More broadly, we heard the importance of creating a cohesive and victim-centred justice response to modern slavery, with diverse stakeholders needing to work collaboratively in a more formalised manner, to provide effective remedies and supports.

“When a person is going into the police to report an incident, maybe police are given information or a process to follow that they have to contact a specific team or something and that they don’t make the statement straight away. I just went through so many issues just trying to report my matter.”

Survivor feedback, Lived experienced targeted consultation, May to June 2025.

Consultations underscored the necessity of mapping current justice pathways, improving cross-jurisdictional coordination between government agencies (including social services and law enforcement at the state and federal level), formalising specialist training on victim engagement and enhancing access to legal and trauma-informed support services. Stakeholders acknowledged the role of the Commissioner in advocating for these necessary developments.

“Prioritising victim identification, protection and empowerment is crucial, including culturally sensitive public awareness so that communities can spot and safely report signs of slavery.”

Dr. Boutier & Dr. Maganaris, Glasgow Caledonian University, written submission.

In conclusion, stakeholders acknowledged the intersection of this priority area with all other priority areas, highlighting that advances would require law and policy reform and a system of justice and support that better centres survivors and populations at risk. They argued for strong national leadership and coordination to address these connections. Our initiatives focus on promoting and advocating for reforms that facilitate such an environment.

“Advocate for improved pathways for survivors to access remedies, including financial compensation, through research, guidance, and engagement with policymakers.”

Anti-Slavery Australia, written submission.



Photo: Tim Herbert

Advancing this priority

Initiatives

1. Collaborate with diverse stakeholders to improve the detection of people experiencing modern slavery

We will engage with key stakeholders to promote a coordinated and evidence-based approach to the detection of modern slavery by government agencies, first responders, and civil society.

2. Advocate for stronger criminal justice responses to slavery and trafficking crimes

We will work with survivors, criminal justice stakeholders and others to identify and address gaps in the criminal justice response to improve victims' access to justice.

3. Promote pathways and support for survivors and workers to reclaim dignity and access meaningful remedies

We will review remediation pathways, working with survivors and other key stakeholders to advocate for improved access to existing pathways and explore options for additional pathways that support recovery.

Intended outcomes

Frontline workers are better equipped to detect modern slavery in the community.

Law and policy makers advance reforms to address identified criminal justice gaps that result in more successful investigations and prosecutions.

Survivors can access a more diverse range of remediation pathways, to identify and access remediation in a form that is meaningful and appropriate to their individual needs and circumstances.

Our vision for long-term impact

Survivors of slavery in Australia are able to access justice and remedy that is meaningful, timely and dignified.

How we will implement this Strategic Plan

This Strategic Plan serves as the framework for action that will underpin our annual workplans. These workplans will set out the planned activities for the year, aligning with the priorities and objectives set out in this document, the insights gained from the consultations, and our ongoing and continued engagement with stakeholders. We will review our progress against the Strategic Plan regularly, including formally through our annual reporting requirement.

We set out four key principles that will underpin the implementation of this Strategic Plan.

Informed by lived experience

Our work is guided by the experiences and expertise of victims and survivors. This is more than recognition and respect – it's essential to ensuring our response to modern slavery is effective.

Collaborative

We value the expertise and ongoing efforts of business, government and civil society. Our role is to support, amplify and build on this work. Together, we can raise Australia's collective ambition to end modern slavery.

Evidence-based

We champion a stronger evidence base for tackling modern slavery in Australia. Our actions are grounded in evidence and informed by best-practice examples from around the world.

Focused

We will take a prioritised and pragmatic approach to implementation. We seek to leverage opportunities as they arise, with a focus on structural and policy reform to help reinforce the foundations for future work.

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October 2025