

Public consultation on the National Action Plan to combat modern slavery 2020-24

Submission by Dr Martijn Boersma and Professor Justine Nolan

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Executive summary

Dr Martijn Boersma and Professor Justine Nolan welcome the opportunity to make a submission to the consultation on the Australian Government's consultation paper on the National Action Plan to combat modern slavery 2020-24.

The key recommendations in this submission are as follows:

1. The Government should bolster the Modern Slavery Act by introducing sanctions for non-compliance, mandate and provide guidance on human rights due diligence and by creating the post of National Independent Anti-Slavery Commissioner;
2. The Government should "name and shame" entities that do not comply with the Modern Slavery Act, as well as entities that are found to have modern slavery in their supply chain;
3. The Government should update its procurement policies to follow international best-practice, and provide additional training to procurement officers;
4. The Government should leverage the impact of public spending by creating a procurement connected policy concerning modern slavery;
5. The Government should prepare for an increase in modern slavery survivors being referred to authorities by creating adequate support structures based on international best practice;
6. The Government should include two additional goals which focus on the nexus between climate change and gender with modern slavery.
7. The Government should facilitate the creation of decent jobs, address wage theft, remove barriers for organised labour, and increase resources for the Fair Work Ombudsman;
8. The Government should create an anti-slavery helpline and geographically plot calls to reveal hotspots across Australia.

Modern slavery

An estimated 40.3 million people worldwide are trapped in a form of modern slavery, which includes: forced labour (work that people perform against their will under the threat of punishment); bonded or indebted labour (when people work to pay off a debt while losing control over working conditions and repayments); human trafficking (which concerns the recruitment and movement of people, usually for forced labour or sexual exploitation); and child slavery (distinct from child labour, this type of exploitation does not only involve children working but also their exploitation for someone else's gain. Other exploitative practices include deceptive recruitment for labour; domestic servitude; and forced marriage. Sixteen million victims are exploited in activities connected in the private economy. The practice is found in emerging economies, as well as in developed countries (International Labour Organization and Walk Free Foundation, 2017).

Evidence suggests that modern slavery is most commonly associated with labour intensive, poorly mechanised activities, requiring a low-skilled labour force (Allain *et al.*, 2013). The reduction in labour costs is a key contributor to modern slavery, it is essentially “an attempt to under-price a key resource (labor) through illegitimate means” (Crane, 2013, p. 51). Many companies maintain multi-tiered sub-contracting networks, while actively looking for low-cost suppliers to achieve a competitive advantage (Kim and Chai, 2017). Companies are thus vulnerable to modern slavery practices through their sub-contracting networks. Modern slavery is typically hidden further upstream in the supply chain (Stringer and Michailova, 2018). While companies may not be immediately aware of modern slavery in their supply chain (Gold, Trautrim and Trodd, 2015; Phillips and Mieres, 2015) this does not mean they are incapable of understanding that there is a risk of modern slavery occurring in their supply chains (Burmester, Michailova and Stringer, 2019).

The Modern Slavery Act

It is estimated that Australia is home to 15,000 modern slavery victims (Walk Free Foundation, 2018). Australia introduced its Modern Slavery Act in 2018. It requires entities to perform a risk assessment and to publicly report on the actions they have taken as a result. The Act requires “certain large entities [to] publish annual Modern Slavery Statements describing their actions to assess and address modern slavery risks” (Home Affairs, 2019, p. 5). Whether or not an entity needs to report depends on meeting an annual revenue threshold: AU\$ 100 million in Australia (Home Affairs, 2019). This means that the Act is focused on larger entities in particular although smaller entities may voluntarily report.

Government-produced guidance provides insight into how the Modern Slavery Act is supposed to work. The Home Affairs Department states that “[t]he reporting requirement aims to support the Australian business community to identify and address their modern slavery risks and maintain responsible and transparent supply chains.” It intends to do this “[b]y improving transparency about modern slavery, the reporting requirement will increase business awareness of modern slavery risks, reduce modern slavery risks in the production and supply chains of Australian goods and services, and drive a business 'race to the top' to improve workplace practices. The reporting requirement will also increase information available to consumers, investors and business partners” (Home Affairs, 2019, p. 13). Evidently, the Act aims to increase corporate accountability for modern slavery by recommending due diligence and mandating public disclosure requirements.

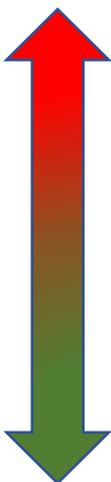
Crucially, there are no hard sanctions for noncompliance. In practice, failure to comply will mean the organisation has not produced a statement, published it on their website or has not set out the steps

taken by the organisation in the relevant financial year. A failure to comply, or a statement that an organisation has taken no steps, may only damage the reputation of the business. It will therefore be for consumers, investors and Non-Governmental Organisations to engage and/or apply pressure where they believe a business has not taken sufficient steps. “Where instances of noncompliance are identified, the Government will seek to engage with noncompliant entities to support them to comply. However, in cases of deliberate and/or severe noncompliance the Government may choose to publicly identify the noncompliant entity”, the guidance goes on to say that “[f]ailure to comply can significantly damage your entity’s reputation, undermine your ability to do business with other entities and damage investor confidence” (Home Affairs, 2019, p. 14).

In summary, the Australian Modern Slavery Act aims to increase corporate accountability for modern slavery by mandating modern slavery risk assessments and by requiring companies to publicly disclose their efforts. Enforcement does not rely on sanctions such as financial penalties for noncompliance or company directors being disqualified from serving on a board. Rather than relying on such hard sanctions, enforcement depends on soft enforcement via scrutiny from stakeholders such as investors, consumers and civil society, and the consequences of noncompliance are phrased in terms of reputational and financial damage. We will address the shortcomings of this approach under “Consultation Questions”.

A holistic approach to (the risk of) modern slavery

The Australian guidance documents recognise that modern slavery sits on a continuum of exploitation and should not be addressed in isolation. This indicates that there is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness seep into instances of human trafficking, slavery or forced labour in a work environment. This outlook recognises that people can be exposed to conditions that worsen over time, sometimes leading to modern slavery (Lewis *et al.*, 2014).

	MODERN SLAVERY
	Worker cannot refuse or cease work because of coercion, threats or deception.
	Worker may also be deprived of personal freedom.
	DANGEROUS OR SUBSTANDARD WORKING CONDITIONS
	Worker can refuse or cease work but doing so may lead to detriment.
	Worker is not paid fairly and does not receive some or all entitlements.
	Worker may be required to work excessive hours.
	Workplace is unsafe.
	DECENT WORK
	Workers’ rights respected.
	Worker free to refuse or cease work.
	Worker paid fairly (at least the minimum wage).
	Workplace is safe.
	Table 1: Where Does Modern Slavery Fit? (Adapted from Home Affairs, 2019, p. 9)

If issues such as partial- or non-payment of wages, unfair dismissals, forced and unpaid overtime, denial of benefits, and denial of the rights of freedom of association and collective bargaining are prevalent and left unchecked, more severe exploitation can develop (Labor Exploitation Advisory Group, 2016; Ethical Trade Initiative, 2018). In order for policy makers, companies and stakeholders

to develop and enforce effective solutions, modern slavery should thus be seen as a complex labour and human rights issue. We will further address this issue under “Consultation Questions”.

Proposed goals of the 2020-24 plan

1. Maintain and promote compliance with international standards on modern slavery;
2. Engage the Australian community to understand and combat modern slavery;
3. Promote an evidence-based response to modern slavery;
4. Maintain a robust and comprehensive legislative framework to combat modern slavery;
5. Train frontline officials to support the identification of victims and effective investigations of modern slavery;
6. Progress effective prosecutions to secure convictions against offenders;
7. Enhance our response to combat forced marriage;
8. Enhance our response to combating serious forms of labour exploitation, including forced labour and deceptive recruiting;
9. Promote transparency and accountability for combating modern slavery risks in global supply chains, including in Government procurement;
10. Provide appropriate support, protections and remedies to empower victims of modern slavery;
11. Enhance our leadership and partnerships to promote regional and international cooperation on combating modern slavery, and;
12. Work collaboratively across government, along with non-government stakeholders, to combat modern slavery.

Consultation questions

1. Do the 12 goals capture key areas of focus for Australia over the next five years?

While we regard the 12 goals as appropriate, there are some goals that should be prioritised and we suggest the addition of two new goals. In our view, particular focus should lie on strengthening the legislative framework (**goal 4**), leveraging transparency and public procurement (**goal 9**), the provision of institutional support for the survivors of modern slavery (**goal 10**) and including a focus on the nexus between climate change, gender and modern slavery (proposed **goals 13** and **14**, see Consultation Question 2 below).

Goal 4: Legislative Framework

A precautionary tale about addressing the social impact of companies through disclosures and soft enforcement is formed by laws that mandate corporate reporting on gender equality. Such laws have existed in many countries for several years, including in Australia (Clarke *et al.*, 2012). Similar to the Modern Slavery Acts in Australia and in the United Kingdom, these laws impose disclosure requirements onto companies concerning the actions they taken to improve the position of women

in their organisation and the effectiveness of these actions, leaving enforcement up to stakeholders and market forces. Well-performing companies are branded as an "employer of choice", while poorly performing companies are (supposedly) publicly chastised. Despite the widespread adoption of these laws, women are still drastically under-represented in corporate leadership positions, while the gender pay gap is reducing at a glacial pace (Neate, 2018).

Empirical evidence from the United Kingdom shows that many companies have failed to comply with Modern Slavery Act. An analysis of the first 75 modern slavery reports produced in the United Kingdom showed that only 29 per cent of reporting organisations complied with basic requirements in terms of getting the report endorsed by the board and making it available on the website. Only nine statements covered all the suggested areas on which information may be included, such as organisational structure, policies and due diligence (Business and Human Rights Resource Centre, 2016). Furthermore, 2017 compliance figures from the UK show that 43 per cent of companies on the London Stock Exchange (Business and Human Rights Resource Centre, 2017) and 42 per cent of the top 100 companies with Government contracts (Shean *et al.*, 2018) failed to meet all the requirements of the Modern Slavery Act.

The Modern Slavery Act in Australia and in the United Kingdom are modelled on the California Transparency in Supply Chains Act (2012), which requires companies doing business in California to disclose the extent to which they engage in verification of supply chains to address risks of slavery and human trafficking. It also relies on soft enforcement: the Californian Act does not impose monetary penalties for failure to disclose, but companies may receive an order from the State Attorney General to take action (Nolan, 2017). Using a sample of 500 companies, research found that between 2013 to 2015 only 31 per cent of entities produced a compliant statement (KnowTheChain, 2015). Based on an analysis of disclosures under the Californian Act, research shows that stakeholders rate disclosures with low levels of due diligence almost as highly as disclosures that reported a high level of due diligence (Chilton and Sarfaty, 2016). Section 16(1)(d) of the Modern Slavery Act currently requires reporting entities to 'describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes' but does not actually mandate such due diligence take place.

These observations raise doubts about whether the Modern Slavery Act in the UK and in Australia will result in companies effectively addressing modern slavery. Apart from the question whether meeting all the requirements will result in companies effectively addressing (the risk of) modern slavery, many entities that are required to comply fail to do so in the first place. When rating the companies that did report, stakeholders rated disclosures with low levels of due diligence almost as highly as disclosures with high levels of due diligence. This implies that corporate stakeholders may not necessarily be well-informed and able to put pressure on companies for poor disclosures. Overall, the empirical evidence suggests that laws mandating social disclosure requirements, which rely on soft enforcement mechanisms to reduce non-compliance, may not be the most effective mechanism to achieve corporate accountability.

The NSW government also passed its own Modern Slavery Act, which is currently under review. Unlike the Federal act, it has created the post of Independent Anti-Slavery Commissioner, and it provides for penalties for businesses that do not comply of up to \$1.1 million. For those reasons, the NSW Modern Slavery Act is much more likely to be taken seriously.

In order to bolster the Federal Act:

- develop sanctions for non-complying companies that may include fines and/or director disqualification;
- mandate that due diligence is a necessary requirement in preventing and mitigating modern slavery; and
- create the post of National Independent Anti-Slavery Commissioner.

Goal 9: Transparency and Government Procurement

The Australian Government should leverage its capacity to inflict reputational damage on companies that have been involved in modern slavery to the fullest degree. The Australian Government should take its cue from the Brazilian government, which launched a 'Dirty List' in 2004: a public register of companies found to have used forced labour in their supply chains. Companies named on this list are monitored for two years and are also subject to fines. The 'Dirty List' is reinforced by a further governmental decree which recommends that financial bodies refrain from granting financial assistance to companies on the list.

Governments procure a wide range of goods and contract out services. It is highly likely that aspects of Australian Government procurement are exposed to the risk of modern slavery. The size and scope of Australian Government procurement also provides an important mechanism to achieve and promote ethical supply chain practices. Governments have an international legal obligation to protect human rights, which includes protecting against abuses perpetrated by private actors. The *UN Guiding Principles on Business and Human Rights* highlight that this obligation applies to the procurement of goods and services by governments.

- Current Australian Government procurement policies should be updated to follow international best-practice, by including statements of support for ethical procurement in tender documentation, which would send a clear signal to the market. This would not impose any additional regulatory burden or costs. This would also send a positive signal to the market and allow procurement officers to make more informed decisions about tenders. This measure would need to be accompanied by additional training to procurement officers.
- To leverage government spending, a procurement connected policy concerning modern slavery should be developed. The Australian Government currently has procurement connected policies on Indigenous procurement and gender equality, as well as Australian industry participation and employment. A procurement connected policy on modern slavery could be structured to impose only the necessary minimum burden on both staff and other stakeholders involved in the development, management, application and evaluation of Commonwealth Government procurements.

Goal 10: Support for Survivors

It is vital that the Australian Government is prepared for the potential flow-on effects of introducing the Modern Slavery Act. The United Kingdom introduced the first national modern slavery law that mandates corporate reporting on this issue in 2015, yet the Government has not provided sufficient support for victims, according to a report by the Winston Churchill Memorial Trust. Its author, a legal expert specialising in trafficking cases, said that “the United States and Europe both have models for long-term support for victims; however, the United Kingdom is lagging behind” (Bacchi, 2018).

The United States allows victims to stay in the country for four years and offers a pathway to permanent residency. The United Kingdom usually only grants a one-year stay, while the path to remain in the country permanently is complicated. Conversely, while Belgium and the Netherlands don't have modern slavery legislation that require companies to report on this issue, both countries do grant victims free legal assistance, a privilege reserved for defendants in the UK, while providing victims with housing and counselling for a longer period of time (Uddin, 2017). This lack of support in the United Kingdom occurs at a time where a record number of modern slavery victims are being referred to authorities. For instance, in 2018, 2118 child slaves were registered in the United Kingdom – an increase of two-thirds from 2016. However, a quarter of victims in the care of authorities went missing at least once, according to research by Every Child Protected Against Trafficking, with some feared to have returned to their traffickers after being treated like criminals or illegal immigrants by authorities (Guilbert, 2018a).

Reasons for running away include poor accommodation, fear of authorities and the ongoing control of exploiters (Baker and Hunter, 2018). Conversely, after a successful pilot, twelve modern slavery survivors from countries including Brazil, Gambia and Sri Lanka participated in a ten-week course at Northern College in the UK in which they were taught computer skills and English. Northern College is in talks with the education ministry about further funding to extend this pilot (Guilbert, 2018b). This pilot found that, for survivors, access to education and work is as important as appropriate housing and counselling.

Due to the introduction of the modern slavery act in Australia, the number of modern slavery victims that will be referred to authorities is likely to increase dramatically. Australia should adequately prepare for this and adopt best practice based on international examples.

2. *Should there be additional goals to address other areas of focus, emerging issues or trends? If so, what should they be?*

We suggest the addition of two goals:

13. Review, assess and disseminate information about the nexus between modern slavery, climate change and environmental destruction.

14. Promote the adoption of a gender lens by reporting entities in their response to addressing modern slavery.

Climate change is no longer a future issue but is disrupting livelihoods now. Recent research has highlighted that both sudden- and slow-onset climate disasters may lead to increased risks of trafficking, and highlighted the role of the state in reducing those risks (University of Nottingham's Rights Lab and the UK Independent Anti-Slavery Commissioner, 2018; Brown et al, 2019). This linkage between the environment and slavery was pushed to the forefront of public attention by Pope Francis in his 2015 'Laudato Si'. Research suggests that are linkages between climate induced migration and modern slavery including trafficking, debt bondage and forced labour and that certain sectors (such as fisheries, fields, forests and factories) may be particularly vulnerable. It is an issue that will impact global supply chains, flow through to Australian sourcing practices and should be expressly referred to in the Government's plan.

Women and girls are disproportionately affected by forced labour, accounting for 99% of victims in the commercial sex industry, and 58% in other sectors (ILO and Walk Free, 2017). Women and girls experience modern slavery in unique ways and also face discrimination and additional barriers in seeking access to remedies. In order to effectively address modern slavery and its impact on women

and girls, the Government should give special attention to the issues and barriers they face (Human Rights Council, 2019).

In addition, we note that it is important to adopt a multi-dimensional perspective to assess the risk of modern slavery: the broader socio-economic context and the local circumstances in which abuses should be taken into account. Indeed, any large- or small-scale factor that undermines a person's capacity to make autonomous decisions about their working life can result in exploitation: limited language skills and knowledge of rights, gender, migration status, and issues such as financial hardship or a history of unemployment (Nolan and Boersma, 2019).

Critically, the Government should more actively enable the creation of decent jobs by promoting standard and secure full-time work as opposed to casual jobs, labour hire, temping and non-standard work contracts that side-step collective bargaining. In addition, the Government should further crack down on wage theft, make it easier for workers to organise their workplace, remove barriers for organised labour, and dedicate significant resources to increase the labour inspection teams of the Fair Work Ombudsman.

3. *The Government is committed to ensuring victims of modern slavery are supported, protected and empowered. Are there ways in which the Government can better reflect the voices of victims and their lived experiences in the 2020-24 Plan and Australia's response to modern slavery?*

We fully agree that this should be a key focus of the Government, as we have argued in "support for survivors" on the previous page.

4. *The Government is committed to ensuring that we can measure the impacts of the 2020-24 Plan. Are there evaluation methods, data sources or metrics the Government should consider in developing an evaluation framework?*

The use of "big data" can assist in measuring the impact of the 2020-24 Plan. For example, in the United Kingdom calls to the anti-slavery helpline are geographically plotted to reveal modern slavery hotspots. An online map allows the public and government to see the percentage of calls from their region (TISC Report, N.D.). This strategy is also applied globally, with 147 nations having agreed to map practices and count the victims of modern slavery. The gathering of global data using standardised measures creates a more comprehensive and comparable overview of modern slavery. It allows authorities to join the dots and identify causes and patterns (Guilbert, 2018c). The benefits of such methods are undeniable. The Government should consider creating an anti-slavery helpline and geographically plot calls to reveal hotspots.

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