



## Submission to the Senate Legal and Constitutional Affairs Committee Inquiry into the Modern Slavery Bill

ALTO Global Consulting (ALTO) welcomes the opportunity to make a submission in support of the Modern Slavery Bill introduced to parliament on 28 June 2018.

ALTO is a consulting agency founded by Ms. Leigh Mathews, a child protection and child rights specialist and the co-founder of the ReThink Orphanages Network.

ALTO provides specialist technical support and advisory services to private and listed companies, philanthropic trusts and foundations, non-profit organisations, religious bodies, schools, universities and individuals on the issue of child protection in tourism, with a special focus on orphanage volunteering and tourism. ALTO has worked with major global travel providers including Intrepid Group, Projects Abroad, World Challenge and GVI to help guide their ethical and responsible transition away from orphanage tourism and volunteering, and continues to support this work.

ALTO's founder and principal consultant, Leigh Mathews made a written submission to the Inquiry into Establishing A Modern Slavery Act in Australia and gave evidence in person to the Committee in a public hearing on how Australia contributes to orphanage trafficking as a form of modern slavery on behalf of the ReThink Orphanages Network. Ms Mathews also wrote and submitted a number of supplementary submission to the Inquiry. Ms Mathews appears regularly on panels and at events on responsible tourism, sharing the work of both ALTO and ReThink Orphanages Network.

The Committee's final report, Hidden in Plain Sight featured an entire chapter on the issue of orphanage trafficking and made specific recommendations regarding the measures that Australia should undertake to halt and further prevent our contribution to this issue.

### **ALTO supports the Modern Slavery Bill as presented to Parliament as follows:**

4.1 ALTO supports the definition of Modern Slavery as listed in the current bill including:

- Trafficking offences as defined under Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children (as this extends the jurisdiction of trafficking offences reportable under the Bill to those that are found in supply chains yet have no nexus with Australian borders). ALTO supports the breadth of this definition because is it important

that the definition captures not just modern slavery practices that occur in Australia, but also those occurring in supply chains internationally.

- Offences under Australia's Criminal Code divisions 270 and 271
- Worst forms of child labour as defined under Article 3 of the ILO Convention

**ALTO makes the following recommendations regarding the Modern Slavery Bill, Explanatory Memorandum and the development of the Modern Slavery Reporting Guidance Notes:**

1. We recommend that the Guidance Notes provide detailed advice on how entities may be at risk of orphanage trafficking and child exploitation in orphanages in their supply chains
2. We recommend that orphanage tourism is included in the Guidance Notes as a form of child exploitation that is reportable under the Act to ensure entities report on 'orphanage tourism products' which are linked to child exploitation in orphanages and orphanage trafficking
3. We recommend that the Guidance Notes explicitly state that entities are to report on any risk or involvement in orphanage trafficking and the exploitation of children in orphanages, including orphanage tourism. We note that orphanage trafficking and the exploitation of children in orphanages are mentioned in the Explanatory Memorandum already.
4. We recommend that it be a requirement that entities over the reportable threshold must comply with the legislation in order to tender for government contracts
5. We recommend that a verified list of entities who have to report is made publicly available.

We thank you for your consideration of this submission and are open to providing further evidence based on the work we have undertaken on this issue, specifically in relation to working with the tourism sector.

Leigh Mathews  
Founder & Principal Consultant  
ALTO Global Consulting