



19 July 2018

To the members of the Legal and Constitutional Affairs Legislation Committee,

Re: Modern Slavery Bill 2018 Inquiry

We are writing on behalf of our non-profit organisation, The Freedom Project, which seeks to educate the Australian public around issues of human trafficking and modern slavery, as well as working in prevention, rescue and restoration programs around the world.

Our vision is for a world free from slavery, and although we work to achieve that through our own projects, we will never see our vision become a reality while there are businesses taking advantage of the poor and vulnerable and exploiting them for profit. We strongly believe that the Commonwealth Modern Slavery Act needs to be robust and effective in keeping Australian companies accountable for their business practices, as well as reducing and eliminating their involvement in global supply chains that are often tainted with slavery.

We are very pleased and proud that the Australian Federal Government has introduced the Modern Slavery Act, and the example that it will set on the global stage in the fight against human trafficking and modern slavery.

We are thankful for all the strong elements of the Act that will go a long way to making a difference. We affirm the inclusion of the following:

- The broad definition of a 'reporting entity' – especially inclusion of the Commonwealth;
- The definition of 'Modern Slavery' to include the worst forms of child labour;
- A voluntary Modern Slavery Statement for those outside the threshold;
- Mandatory criteria for the Modern Slavery Statement, including being signed by a responsible member of the company;
- A Minister responsible for maintaining a register of Modern Slavery Statements;
- The registration of revised Modern Slavery Statements and;
- A review of the Act after 3 years.

However, there are still some major concerns we have about key missing elements which threaten to undermine the power of the Act.

We therefore strongly recommend that the government include the following:

- An Independent Commissioner to oversee the legislation and process
- For the reporting threshold to be lowered to (\$25million) and/or based on high-risk industries
- That there would be penalties for non-compliance in reporting, even non-monetary penalties.

If these elements could be included in the Modern Slavery Act, we believe it would go a long way to strengthening our commitment to ending all forms of human trafficking and slavery. We must implore Australian businesses to be transparent, accountable and give consumers, investors and other stakeholders the confidence in Australian businesses that we are not contributing to the deplorable conditions endured by over 45 million people worldwide.

Yours sincerely,
Mike Newton-Brown CEO
on behalf of The Freedom Project