

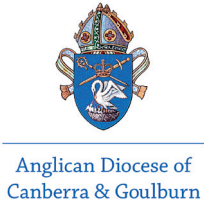
INQUIRY INTO MODERN SLAVERY ACT 2018 AND ASSOCIATED MATTERS

Organisation: Be Slavery Free

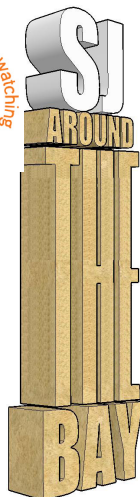
Date Received: 3 October 2019

To the NSW Legislative Council's Standing Committee on Social Issues

Inquiry into the Modern Slavery Act 2018 and associated matters



www.acrath.org.au
People are NOT for sale



Who Are We?

Be Slavery Free (formerly known as STOP THE TRAFFIK) is part of the global movement that aims to prevent, disrupt and abolish slavery. We work as a coalition. Together with the organisations listed we have examined the documents related to this Inquiry, agreed on the key issues which we wish to address and prepared this response.

The organisations are diverse. Faith groups, community groups, trade unions, aid and development agencies and ethical businesses. Our combined reach through our networks is in excess of 4 million Australians.

We work in areas of

- consumer-driven campaigning and general community awareness and education on modern slavery and its prevention
- working with business to increase traceability and transparency in their supply chains; introduce measures to illuminate human trafficking, slavery and slavery like practices and highlight businesses who are making progress
- convening and collaborating with other civil society groups for joint actions to abolish slavery and slavery-like practices
- international development work focussed on poverty alleviation, after-care of survivors and re-integration programs
- legal services and care for persons who have experienced slavery in Australia

Together we welcome this opportunity to comment on the Inquiry into the Modern Slavery Act 2018 and associated matters. Please see a list of co-branding organisations on page 12.

We recommend that

1. the NSW MSA continue to operate at the A\$50 million threshold and include penalties for non-compliance
2. the language of 'turnover' and 'consolidated revenue' be harmonised with the MSA Cth 2018
3. should the Government proceed with exclusions, that a list of excluded entities be prepared; together with guidance making the nature of the exclusion clear
4. the committee develop a timetable to report earlier than currently proposed
5. the regulations be developed and approved alongside the Inquiry process
6. a clear timeline for the implementation be disclosed by the Government as soon as possible, enabling the Act to come into effect on 1 January 2020
7. the Inquiry committee include in its final report the capacity such an Act has to release people who are enslaved and to prevent further enslavement of people
8. the Inquiry Committee consider whether the introduction of Forced Marriage Prevention Orders (as in the UK) may be useful in strengthening the NSW Act
9. in the absence of progress towards a National Labour Hire Licencing scheme, we encourage the committee to consider and recommend a NSW state-based licencing scheme of labour hire agents as has been done in Victoria²⁴ and Queensland²⁵

Preliminary Comments

In the words of Premier Gladys Berejiklian, 'There is an undeniable moral imperative to take action in relation to all forms of modern slavery.'¹

This in and of itself is sufficient reason for New South Wales (NSW) to proceed with the implementation of the NSW Modern Slavery Act (MSA). NSW must not step back from this.

We understand that the decision by the NSW Government to send the NSW MSA (2018) to the Legislative Council Standing Committee on Social Issues for review, rather than enacting the legislation, relates to operability of the proposed anti-slavery scheme.² However, it also seriously impacts the timeline for the implementation of the Act. No clear timeline is provided.

We need strong moral and ethical leadership on this issue and this dictates that urgent consideration must be given to the establishment of a clear timeline, taking any and all necessary steps to enable implementation of the Act as soon as possible.

Further reasons include:

- The human-scale of the problem and the impact of delays are as follows
 - Modern Slavery is a heinous violation of human rights. **25,200** new people are trafficked into labour-related **slavery every day**³
 - Every six months, equivalent to the population of Sydney enters into slavery conditions. Every delay by NSW contributes to a delay in preventing and abolishing slavery
- As the 7th largest economy in Asia⁴ - the region of the world where approximately two thirds of modern slavery is found⁵ - NSW needs to take the 'moral imperative' its government has identified seriously and offer the necessary leadership
- NSW has the strongest and most holistic Modern Slavery legislation in the world. It should be proud of this and seek to build on the reputation we have earned by implementing it, as a matter of urgency
- The Government has not provided any rationale for a protracted delay

Putting it simply, NSW has a Modern Slavery Act which has already received 'Assent' and the Government now needs to take decisive and swift action to implement it.

Cyber Sex Trafficking - Case Study

This case study offers an insight into the kind of work those in our networks undertake; the collaborations necessary to disrupt slavery; its cross-border nature and the time it takes to address cases. It also provides a good example of how state and federal bodies and NGO's can work efficiently and collaboratively.

In December 2015, the NSW police found child sexual exploitation materials on a mobile phone owned by a male Australian sex offender, during a home visit inspection. Forensic analysis of the Australian's phone revealed that he had been sent photos of two boys from the Philippines. Their mother had sent the photo messages. The Australian perpetrator was placed under arrest on 9 February 2016.

The Philippine authorities and International Justice Mission were made aware of this case through a referral from the Australian Federal Police. On 18 July 2019, a 35-year-old woman in the Philippines was arrested at her residence after she sent photos of her four-year-old son being sexually abused. These photos were sent to an Australian through an online message platform in exchange for money. The four-year-old boy was rescued at the house, while his 11-year-old brother was rescued less than an hour later in a separate location.

(International Justice Mission - <https://ijm.org.au>)

Comments on specific terms of reference:

Term of Reference (a)

The operability of the proposed anti-slavery scheme

We commend the Government on the consultation draft of the Modern Slavery Bill 2019 (MSA Amendment Bill) with the focal point of these changes being to ensure that the proposed NSW MSA better aligns with the policy intent behind the NSW MSA (2018), the constitutionality and the ability of the proposed NSW MSA to operate and function effectively.

We also commend the Department of Premier and Cabinet on the inclusion of Attachment A in their submission into the Inquiry into the Modern Slavery Act 2018 (the NSW Inquiry 2019), which outlines the reasons for, and the effect of, each of the proposed amendments to the NSW Act. We understand from the terms of reference that this is not an attempt (nor is it necessary) to return to examining the first principles which established the NSW MSA (2018). Neither is the Inquiry seeking to unnecessarily delay the implementation of a NSW MSA. Rather the proposed changes are essentially to better reflect the intent behind the NSW MSA (2018) which has been given 'Assent'.⁶

Having reviewed and considered each of the proposed amendments to the NSW MSA (2018), we largely concur with the effect and believe they address any potential concerns with respect to the operability of the anti-slavery scheme.

It is our position that

1. The Amendment Bill ensures the operability of the proposed anti-slavery scheme by:

- Ensuring goods and services procured by the NSW Government and Local Governments in NSW are not the product of modern slavery
- Ensuring corporations where a Minister of the state is a shareholder fall within the definition of a 'commercial organisation' and be required to produce a Modern Slavery Risk statement
- Clarifying the role of the Commissioner and allowing greater flexibility in the role and overseeing flexibility in reporting by businesses

2. We believe it would be further strengthened by allowing for:

- Voluntary Modern Slavery Risk statements for entities which fall outside the definitions and thresholds

3. It is imperative that the NSW MSA Amendment Bill:

- Continues to include penalties for non-compliance in reporting. This recognises that voluntary schemes have had little success in addressing modern slavery and child labour (see case study below). This is also true of mandatory schemes without penalties such as the United Kingdom (UK) MSA 2015⁷ where compliance is less than 23% of reporting companies meet the minimum requirements of its Act⁸
- Retains the reporting threshold of \$50 million. This reporting threshold is similar to the UK MSA (2015) of UK£36 million

It would be helpful for the language used in each of the Federal and State legislations, to be consistent on the subject of threshold. Currently both turnover and consolidated revenue are used. Consistency across jurisdictions with accompanying definitions of terminology would be helpful.

We recommend that

- 1. the NSW MSA continue to operate at the A\$50 million threshold and include penalties for non-compliance**
- 2. the language of 'turnover' and 'consolidated revenue' be harmonised with the MSA Cth 2018**

Cocoa Industry - Case Study

The following case study illustrates the inadequacies and inefficiencies of voluntary mechanisms. Whilst these voluntary schemes are well intentioned, it is clear that they are not sufficient to address slavery in supply chains. Government intervention, penalties and regulation is needed.

In the year 2000, the media cast a spotlight on worst forms of child labour and human trafficking in the cocoa industry in West Africa. Two thirds of the world's cocoa is produced in West Africa. A key driver of the use of child and slave labour is the low income of cocoa growers. This cocoa is sourced largely by chocolate companies for the indulgence of people in developed nations.⁹

In 2001, Senator Harkin and Congressman Engel proposed legislation in the United States of America (USA), commanding a 'slave-free' labelling system for chocolate. After intense lobbying, a compromise was reached with the chocolate and confectionary industry and a voluntary industry-managed protocol (without legal implications or penalties) was agreed to. The instrument established is known as the Harkin-Engel Protocol. Since then

- In 2005, the first deadline of the Harkin-Engel Protocol was not met*
- In 2007, STOP THE TRAFFIK (now Be Slavery Free) was formed and with other civil society groups began campaigning world-wide and the profile of the issue again reached the attention of the public*
- In 2008, the second deadline of the Harkin-Engel Protocol was not met*
- In 2009, some progress was made with Cadbury, Mars and Kraft making commitments on third-party certification and labelling of products*
- In 2010, the third deadline of the Harkin-Engel Protocol was not met, and companies developed an extension to 2020. On current progress, the 2020 commitments are also unlikely to be met*
- It is estimated that there are still 2.2 million children in child labour and evidence of human trafficking, worst forms of child labour and slavery continue¹⁰*
- All the major companies are now addressing child labour to different extents but the industry as a whole is seemingly reluctant to address the key issue of the price paid for cocoa to farmers*
- In 2019 the Governments of Ghana and Cote d'Ivoire introduced a mechanism to increase the wages of cocoa growers. This is currently being debated by certifiers, processors and chocolate companies*
- Be Slavery Free and other civil society groups continue to campaign and engage the industry asking for change and the ending of the crimes of child labour, worst forms of child labour, human trafficking and slavery*
- Australian iconic chocolate brands Haigh's and Darrell Lea and Robern Menz have all taken positive steps in recent years to address these issues. Whilst they may not need to report under the MSA Cth (2018), they will be captured under the NSW MSA and be able to profile their positive actions*
(Be Slavery Free - <https://stopthetraffik.com.au/chocolate>)

Term of Reference (b)

The effect of the anti-slavery scheme on business, including the supply chain reporting obligations under s24 of the NSW Act

Any Modern Slavery Act requiring a mandatory assessment of risk and reporting for transparency in supply chains is good for business. It creates a level playing field. Those who are doing the right thing are not penalised by needing to compete with those whose business practices focus solely on price without considering or addressing modern slavery risks and human rights abuses.

There are costs involved with checking for and addressing modern slavery, but there is also mounting evidence that there are positive long term performance benefits as well. Forced labour exploitation generates approximated US\$150 billion in profit globally.¹¹ Tax is not paid on this money.

Despite warnings of doom during the abolition of the transatlantic slave trade,¹² the economy, and businesses managed to adjust and prosper. Relatively, the economics of tackling modern slavery at a national and a global level have never been better.

Any business built on a reliance on slavery has a flawed business model. President Obama stated, 'It ought to concern every business, because it distorts markets.'¹³ It creates false economies and false economies will collapse! We urge the NSW Government to further strengthen the NSW economy by requiring and supporting those doing business in NSW to also be a part of ending Modern Slavery.

Our experience working with businesses that have taken the eradication of slavery in their supply chains seriously, is that they have found it to be advantageous for their business.

Addressing Modern Slavery is Good for Business (and Society)

Our experience at Konica Minolta, in implementing an ethical sourcing program and in advocating for modern slavery legislation has been overwhelmingly positive. Our employees have expressed their pride in working for a company that seeks to address this terrible societal issue. Our business has grown, as more and more companies, when evaluating suppliers, have regard not just to what you are selling, but to who you are and what you stand for.

Dr David Cooke, Managing Director
Konica Minolta, Australia

You can potentially, I think, make more profit if you are doing the right thing and encouraging others to do the right thing. If you are doing things more ethically I think over the long term, you will make more profit and you will benefit consumers globally by lifting people up out of their situations and making that global wealth that we need to bring people out of poverty.

Chris Crewther, Chair of the Commonwealth Inquiry
A Modern Slavery Act for Australia

Companies that proactively support transparency in their supply chains are much more able to be compliant to current as well as future legislations and they are also able to operate competitively in global markets.

Mabel Wong, Director Sustainability Consulting
ELEVATE Pty Ltd

By tackling social issues in our 'Seachange Sustainability'¹⁴ program we can ensure that we are being transparent in our approach and that we are putting people at the heart of our business. It is not only good for the business; it is good for the people who work in our business but also it is good for the people who work in our supply chains. Nobody wants to work for a company that isn't taking human rights seriously.

Dr Darian McBain, Global Director of Corporate Affairs and Sustainability
Thai Union

Building and sustaining a slave free supply chain gives an organisation and its extended trading partners a distinct competitive advantage.

Vikram Bhakoo, PhD, Associate Professor, Department of Management & Marketing
Faculty of Business & Economics, The University of Melbourne

Modern slavery represents a tragic market failure that leaves us all worse off. By treating people as disposable objects to be exploited, we all miss out on their lost economic and social potential.

Fiona Reynolds, Chair Financial Sector Commission on Modern Slavery & Human Trafficking
CEO of the Principles for Responsible Investment

Complying with legislation is simply the cost of doing business in this day and age



The financial cost for businesses in NSW addressing slavery should be viewed as a necessary investment into meeting their international human rights obligations and agreements for the workers in their supply chains

The reputational risk of not taking these steps is much higher than any cost of compliance



As public interest in ending modern slavery continues to grow, there will be an implicit social cost (loss of consumer confidence and therefore business) and a real financial cost (penalties) for companies who are recalcitrant on modern slavery

The Commonwealth (Cth) has estimated the regulatory impact of producing a Modern Slavery Risk statement as \$21,950.



With a lower reporting threshold for the NSW Modern Slavery Act, the reporting organisations will be smaller. As such they are likely to have smaller and less complex supply chains. This will make the average cost of compliance less than the MSA Cth (2018) estimation. These smaller entities will also need to be resourced with models and sample road maps on how to address these regulatory requirements

The submission to the Inquiry from the NSW Government uses this same figure for companies covered under the NSW Act.



The first year of reporting will be more onerous and resource intensive for any organisation that has not begun the process of addressing Modern Slavery. In subsequent years, once a culture of prioritising addressing Modern Slavery has been established in the business, this should decrease

Clarifying supply chain reporting obligations

Charities and Not-For-Profits, Local Government and Small Business

We do not agree with the exclusion of any organisation, business or entity solely on the basis of their size and nature of the business. The reporting requirement need not be onerous, it is simply good business and good for society.

Should the Government proceed with offering the proposed exemptions it also needs to make clear that

- This is an exemption from the reporting requirement only and not from providing information to those they do business with on their request
- Although requiring some investment by business, does not need to be an expensive task
- Supporting modern slavery is a crime no matter the size of a business and whether it is required to report or not

We recommend that

3. should the Government proceed with exclusions, that a list of excluded entities be prepared; together with guidance making the nature of the exclusion clear

Local Government

Local Government NSW¹⁵ is the peak body for Local Government in NSW. They already own and offer a fully integrated procurement service to councils and associated organisations in NSW. It is simply good business to do so. Just as they offer goods and services needed by Local Government, they can also undertake a Modern Slavery risk assessment on the products and services they provide. Local Governments provide similar services to each other. Local Government NSW can resource them to easily produce a Modern Slavery Risk Assessment and statement. This should be legislated.

Charitable Donations

The public has a right to be assured that their charitable donations are not being used to procure goods and services which are the product of Modern Slavery. Hence, donations should be included in calculation for establishing if a charity falls within the threshold for reporting.

‘Small’ Business

For taxation purposes, the Australian Taxation Office defines a small business as one that has an aggregated annual turnover (excluding GST) of less than A\$2 million. For employment purposes, Fair Work Australia defines a small business as one that has less than 15 employees. The Australian Corporations Act defines a large business as one with a consolidated revenue in excess of A\$50 million with 100 or more employees.¹⁶ To suggest that a business with a turnover between A\$50 and A\$100 million with 20 employees is ‘small’ is inconsistent.

Most businesses with a turnover or consolidated revenue in excess of \$50 million will also have 20 or more employees. In the case of a high-turnover business with a small number of staff, there is no obvious rationale for an exemption. This exemption serves no purpose. However, if the Government proceeds with exempting businesses that employ fewer than 20 employees, it needs to be clear where those employees are located. Whilst we assume it is anywhere in the world, this is not stated and could be assumed otherwise.

Further comments on specific terms of reference:

Term of Reference (g)

Whether the passage of the Modern Slavery Act 2018 (Cth) renders parts or all of the NSW Act unnecessary, or requiring of amendments to address inconsistencies or gaps

We do not believe that the Modern Slavery Act 2018 (Cth) renders any part of the NSW Act unnecessary. The two Acts are complementary. Some things are State responsibilities as well as Federal. NSW has a clear responsibility and moral obligation in this area.

Any response to Modern Slavery requires a holistic approach. In that sense the NSW MSA (2018) is a stronger Modern Slavery Act, than the present Modern Slavery Act 2018 (Cth). The NSW MSA (2018) provides a holistic, person-centred approach to addressing Modern Slavery with crucial components such as

- An Anti-Slavery Commissioner responsible for advocacy and victim support and regular review of the Act
- Education and awareness raising for the community and business
- Support, compensation and protection systems for those who have experienced slavery
- Government procurement being covered by the Act
- Modern Slavery risk reporting with penalties for non-compliance

Removing part of the NSW MSA (2018) will impact the other parts. Ending slavery requires a holistic approach; recognising the shared responsibility by civil society, business, government and the community; and providing the best chance for ending Modern Slavery.

At this stage, the Modern Slavery Act 2018 (Cth) is a ‘Transparency in Supply Chains Act’ and does not (yet) take the more-inclusive approach recommended in the ‘Hidden in Plain Sight’ Inquiry report¹⁷ nor provided for in the NSW MSA (2018). The Commonwealth Inquiry Report, ‘Hidden in Plain Sight’ recommended a reporting threshold of \$50 million (similar to the UK MSA of UK£36 million).¹⁸ The reason given for choosing a higher threshold was explained as lack of capacity within the Commonwealth government to identify and process more than the estimated 3,000 - 3,500 reports. Some Australian companies (many of them with an employee in NSW) operating in the UK are required to report in the UK but will not be required to report in the Commonwealth. In the proposed NSW scheme the threshold matches the UK threshold, and is better practice.¹⁹

The use of digital technology solutions by NSW can enable the processing of large numbers of reports, as well as providing the kind of data which governments, business, consumers, academics and civil society currently deeply desire to grow their capacity to understand the realities and find lasting solutions. Such solutions need not to be expensive.

A survivor needs support - Case Study

Longdy's experiences are no different to those who experience slavery in Australia. Ensuring survivors receive appropriate care is a crucial component of the NSW MSA. A holistic Modern Slavery Act with a Commissioner who advocates for victims is crucial, especially when there are proposed amendments to the original Modern Slavery Risks orders.

Targeted because of his physical disabilities caused by polio, Longdy was trafficked as a child to beg on the streets of Thailand – a country visited by 800,000 Australians every year. For six years, the young boy was exploited and deprived of food if he didn't make enough money.

Today Longdy, now 29, is a passionate activist and qualified counsellor working for anti-slavery NGO Hagar.

Longdy was rescued and referred to Hagar, which helps survivors overcome their trauma and build a new future. Hagar ensured he had a safe place to live and provided him with intensive counselling. Hagar also helped to reunite Longdy with his family.

'Day by day, year by year, I felt I got better,' he says.

With support from Hagar, Longdy now has degrees in Psychology and English, and is about to begin a Master of International Studies and Management. He hopes one day to open a counselling centre for young people.

His story illustrates the profound and traumatic impact that slavery has on human beings but equally, the healing and bright future that can come with the right support.

(HAGAR Australia <https://hagar.org.au>)

Term of Reference (h)

The preferred course of action to address the matters identified

This Act (MSA NSW 2018) passed through all processes including being given 'assent' last year. Why will this Inquiry take 59 days to receive submissions and then a further 140 days for reporting? A total of 199 days. Recent inquiries by the Legislative Council Standing Committee on Social Issues on 'Provisions of the Ageing and Disability Commissioner Bill 2019' and 'Reproductive Health Care Reform Bill 2019' have taken 8 and 21 days respectively.²⁰

Delays have an impact both on business and on the prevention of slavery. The delays create uncertainty for business while they continue to be unaware of whether they will be required to report, when and how. Submissions close on 4 October 2019 with the Inquiry report due 14 February 2020. In this time 3,326,400 new people (or nearly half the population of NSW) will have potentially entered slavery world-wide.²¹ Implementation should proceed with haste.

Trapped in Forced Labour in NSW - Case Study

The crime of Modern Slavery happens in New South Wales. Not all are reported or prosecuted.

Bulu left the Pacific Islands to become a 'marketing manager' for a restaurant on the North Coast of NSW. Excited to leave poverty and unemployment behind, she was looking forward to learning new skills. On arrival, she handed her passport to her new employer to 'sort out her visa'. She had no idea they were keeping her passport and identity.

She was kept in a small room for two years, unpaid and brought into the restaurant at night to work all night – 60 hours of cleaning and prepping food each week. She was trapped. Alone. Depressed.

One day her room was not locked so she took the opportunity to run and was picked up by some farmers on the Pacific Highway who helped her go to a local church for help.

(The Freedom Hub, <https://thefreedomhub.org>)

Addressing slavery is urgent. The Act was due to come into effect on 1 July 2019, further delays are highly undesirable in the current context.

We recommend that

4. the committee develop a timetable to report earlier than currently proposed
5. the regulations be developed and approved alongside the Inquiry process
6. a clear timeline for the implementation be disclosed by the Government as soon as possible, enabling the Act to come into effect on 1 January 2020

Term of Reference (i)

Any other related matter

We are surprised that the focus of the Terms of Reference for this Inquiry are primarily about the impact of the Act on business rather than on the victims of slavery in the supply chains of products and services we purchase. We are first and foremost a society with an economy, and not the other way around. Our values shape our society and hence our economic policies.

This Act is about addressing crimes against some of the most vulnerable people in societies. 50% of the victims are young people and children and 71% are women. Of those women, it is estimated 80% are also sexually abused.²² Tolerating this crime, against these people, is not part of our values.

Forced Marriage of Lalani - Case Study

The law can make a difference. The Australian Federal Police have received more than 200 referrals for forced marriage since it became a crime in 2013. It is the tip of the iceberg. The NSW MSA, with its support for victims, will provide further awareness of the crime and importantly support and potentially compensation for victims on getting on with their lives.

Lalani is a 16-year-old girl who was attending high school in Melbourne. Her parents took her overseas for a holiday to their country of origin. When they arrived Lalani discovered preparations for her marriage were well under way. She didn't want the wedding to take place but felt she had no choice but to comply. Lalani's parents returned to Australia with her passport.

Through Facebook, Lalani's school friends in Australia alerted her to the My Blue Sky website²³ and the fact that forced marriage is a slavery-like practice and is illegal in Australia. Lalani was able to receive support through the My Blue Sky. She was assisted to obtain new Australian travel documents and an airline ticket back to Australia.

Lalani did not return to live with her family. She expressed to her NGO caseworker that she wanted to reconnect with some family members and was given mediation assistance to do so. Lalani was able to continue working towards her dream of graduating from university.

ACRATH is committed to running education programmes for schools to ensure all young people, especially girls, know their legal right not to be forced into marriage. ACRATH is also working to provide school leadership, teachers, welfare staff and parents with information regarding the current Australian legislation regarding forced marriage.

(ACRATH - Australian Catholic Religious Against Trafficking in Humans, <https://acrath.org.au>)

We recommend that

7. the Inquiry committee include in its final report the capacity such an Act has to release people who are enslaved and to prevent further enslavement of people
8. the Inquiry Committee consider whether the introduction of Forced Marriage Prevention Orders (as in the UK) may be useful in strengthening the NSW Act
9. in the absence of progress towards a National Labour Hire Licencing scheme, we encourage the committee to consider and recommend a NSW state-based licencing scheme of labour hire agents as has been done in Victoria²⁴ and Queensland²⁵

Concluding Comments

This Act is not just a piece of legislation. It is a blueprint for the kind of society we want NSW to be, respecting and upholding human rights including the fundamental right of people to be free. The Act is an expression of the society and values we want to characterise NSW. We can – and should – be setting world standards. There is a moral imperative to do so.

At a time when other Parliaments around the world are looking at strengthening their Modern Slavery legislation or are introducing strong, full human rights compliance beyond slavery, the Inquiry committee must not step back from taking meaningful swift action on the human rights of the world's most vulnerable people.

We would request an opportunity to give evidence to the Inquiry. If we can be provided with the areas the committee wishes to examine more fully from our submission, we can ensure the correct make up of a small team.

References

1. Premier Gladys Berejiklian, in her second reading speech for the Act, 6 June 2018, <https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/>
2. 'The amendments proposed to the NSW Act by the Modern Slavery Amendment Bill 2019 (the Bill) (Attachment B) will ensure that the NSW Act better aligns with the policy intent behind it, and will enhance the legal clarity, constitutionality and operation of the NSW Act.' NSW Government submission to the Inquiry into Modern Slavery Act 2018 and associated matters. <https://www.parliament.nsw.gov.au/lcdocs/submissions/64692/0001%20%20NSW%20Government.pdf>
3. Calculations from the Mekong Club (<https://themekongclub.org>) based on the Global Slavery Index (<https://www.globalsslaveryindex.org>) and the estimation of 20% of the total are new people entering slavery each year
4. <https://www.smh.com.au/national/nsw/how-would-sydneys-economy-rank-internationally-if-it-were-a-citystate-20170227-gumiqr.html>
5. Global Slavery Index (<https://www.globalsslaveryindex.org>)
6. Ibid, p3
7. <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>
8. <http://www.modernslaveryregistry.org> Minimum requirements of the UK Act are
 1. Statements published on the company's website with a link on the home page
 2. Signed by director or equivalent
 3. Explicit approval by the board is included in the statement
9. <https://www.voicenetwork.eu/cocoa-barometer/>
10. <https://www.washingtonpost.com/graphics/2019/business/hershey-nestle-mars-chocolate-child-labor-west-africa/>
11. Ibid, p3
12. The merchants and plantation owners in William Wilberforce's time, warned that the abolition of slavery would mean ruin for Britain, as its economy would collapse.
13. President Barak Obama speech at the Clinton Foundation <https://obamawhitehouse.archives.gov/the-press-office/2012/09/25/remarks-president-clinton-global-initiative>
14. <https://seachangesustainability.org>
15. <https://www.lgnsw.org.au>
16. <https://asic.gov.au/regulatory-resources/financial-reporting-and-audit/preparers-of-financial-reports/are-you-a-large-or-small-proprietary-company/>
17. PARLIAMENT OF THE COMMONWEALTH OF AUSTRALIA, Hidden in Plain Sight, An inquiry into establishing a Modern Slavery Act in Australia. Joint Standing Committee on Foreign Affairs, Defence and Trade, December 2017 Canberra. https://parlinfo.aph.gov.au/parlInfo/download/committees/reportjnt/024102/toc_pdf/HiddeninPlainSight.pdf;fileType=application/pdf
18. Ibid p4
19. Some submissions to the Cth Inquiry recommended the use of the definition of a large corporation in the Corporations Act https://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Foreign_Affairs_Defence_and_Trade/ModernSlavery/Submissions
20. <https://www.parliament.nsw.gov.au/committees/listofcommittees/Pages/committee-details.aspx?pk=246#tab-inquiries>
21. Ibid p3
22. Ibid p3
23. <https://mybluesky.org.au>
24. <https://labourhireauthority.vic.gov.au>
25. <https://www.labourhire.qld.gov.au>

Organisation	Role	Title	First name	Last Name	website
Anglican Diocese of Canberra and Goulburn	Bishop	The Right Reverend Doctor	Mark	Short	https://anglicancg.org.au
Anti-Slavery Australia	Acting Director	Professor	Jill	McKeough	http://www.antislavery.org.au
Australian Catholic Religious Against Trafficking in Humans (ACRATH)	President	Sr	Noelene	Simmons sm	www.acrath.org.au
Australian Centre for Christianity and Culture	Executive Director	The Right Reverend Professor	Stephen	Pickard	https://about.csu.edu.au/community/accc/home
Baptist Association of NSW and the ACT, Public Engagement Group	Public Engagement Coordinator	Ms	Kelly	Crawford	http://www.gen1kmission.org.au/public-engagement/
Baptist World Aid Australia	Advocacy Co-ordinator	Ms	Eliza	Johnson	https://baptistworldaid.org.au
Be Slavery Free	Co-Director	Ms	Carolyn	Kitto	https://stopthetraffik.com.au
Buoyancy	Director	Ms	Samantha	Jennings	https://buoyancyfilm.org/film/
Causeway Films	Manager, Development and Production	Ms	Taylor	Goddard	https://www.causewayfilms.com.au
Dalgarno Institute	Executive Director	Mr	Shane	Varcoe	www.dalgarnoinstitute.org.au
Dignity Freedom Network	Executive Director	Mr	Jonathan	Rodwell	https://dfn.org.au
Empower Collection	Owner / Manager	Mr	Ian	Kikkert	https://empowercollection.com
Etiko	Founder/Director	Mr	Nick	Savaidis	https://etiko.com.au
Fighting for Justice	Founder	Ms	Andrea	Tokaji	https://andreatokaji.com
Freedom United	Campaign Strategy & Communications Manager	Mr	Jamison	Liang	https://www.freedomunited.org
Good On You	Co-Founder/Chief Executive Officer	Mr	Gordon	Renouf	https://goodonyou.eco
Gosford Anglican Church	Rector	The Venerable	Rod	Bower	https://www.anggos.com.au
Hagar Australia	Chief Executive Officer	Ms	Jo	Pride	https://hagar.org.au

Human Rights Law Centre	Legal Director	Ms	Keren	Adams	https://www.hrlc.org.au
International Justice Mission	Chief Executive	Ms	Caroly	Houmes	https://ijm.org.au
Justice and Mercy Network	Founder	Ms	Tanya	Matthias	http://www.thejamnetwork.com
Mercy Foundation	Chief Executive Officer	Ms	Sue	Mowbray	https://www.mercyfoundation.com.au
Offspring	Founder	Ms	Kristi	Van Es	https://offspringproject.org
Oxfam	Advocacy and Campaigns Manager	Ms	Rachel	Ball	https://www.oxfam.org.au
Presbyterian Church of Australia in NSW	Member of Gospel, Society & Culture Committee of PCNSW	Reverend	Sandy	McMillan	www.pcns.org.au
Project Didi Australia	Projects	Ms	Clare	Bartram	https://www.projectdidiaustralia.org
Project Futures	Chief Executive Officer	Ms	Jo	Maloney	www.projectfutures.com
RREPP	Founder/Director	Mr	Scott	Goddard	www.rrepp.com.au
SJ Around the Bay	Convener	Mr	Phil	Jones	http://sjaroundthebay.org/
SOS Foundation	Chief Executive Officer	Ms	Nikki	Capp	https://soshealth.org.au/
Spirited Consulting	Co-Director	Mr	Fuzz	Kitto	https://spirited.net.au
Sustainable Rescue	Founder	Ms	Mary	Adams	https://www.sustainablerescue.com
The A21 Campaign	Reach Manager	Ms	Blake	Loaney	https://www.a21.org
The Freedom Hub	Founder/Managing Director	Mrs	Sally	Irwin	https://thefreedomhub.org
The Freedom Project	Founder/Chief Executive Officer	Mr	Michael	Newton-Brown	https://www.thefreedomproject.org
The Mekong Club	Chief Executive Officer	Mr	Matt	Friedman	https://themekongclub.org
Unchained	Founder/Chief Executive Officer	Dr	Stephen	Morse	www.unchained.net.au
Uniting Church in Australia, Synod of NSW and the ACT	Moderator	Reverend	Simon	Hansford	https://hswact.uca.org.au
War on Slavery	Co-Founder/Director	Ms	Jane	Jeffes	http://waronslavery.org

War on Slavery	Co-Founder/Director	Ms	Becky	Honey	http://waronslavery.org
Welcoming Australia	Chief Executive Officer	Mr	Aleem	Ali	https://welcoming.org.au