

Review into the Modern Slavery Act 2018 (Cth)

**Prepared by the Retail Supply Chain Alliance for the Modern
Slavery Act Review Secretariat, Attorney General's Department**

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Retail Supply Chain Alliance
Fairness from the farm to your front gate



Prelude

The Retail Supply Chain Alliance (RSCA) welcomes the opportunity to contribute to the review into the *Modern Slavery Act 2018* (Cth) ('the Commonwealth Act').

The Retail Supply Chain Alliance ('the Alliance') represents and advocates for the rights of workers across the supply chain in Australia.

The Alliance is a coalition of trade unions that represent workers in each facet of the supply chain.

The Transport Workers' Union (TWU), the Australian Workers' Union (AWU) and the Shop, Distributive and Allied Employees Association (SDA) are worker representatives who have formed the Retail Supply Chain Alliance, which together have coverage across the full spectrum of the supply chain.

The Alliance was formed in 2019 to advance the cause of workers' rights and reduce exploitation across the supply chain.

The Alliance endorses the Australian Council of Trade Unions (ACTU) submission to this consultation process, and further makes the below submissions.

Findings and Recommendations

Recommendation 1: The Commonwealth Act should provide for penalties for non-compliance with mandatory reporting.

Recommendation 2: As a general principle, entities should only be exempt from reporting under the Commonwealth Act if the costs of compliance outweigh the benefits. Consequently, the Commonwealth Act's reporting requirements should apply to:

- a) Any businesses with a turnover of more than \$50 million (rather than the current \$100 million), including not-for-profits.
- b) Businesses which meet the turnover threshold, but have less than 20 employees.
- c) Businesses which do not meet the turnover threshold, but employ more than 20 employees in a high-risk sector (such as agriculture).

Recommendation 3: The Commonwealth Act should establish a role for an Anti-Slavery Commissioner, supported by a Parliamentary Committee to provide oversight of the Act.

Recommendation 4: The Commonwealth should establish a national compensation scheme for victims of modern slavery.

Recommendation 5: The Commonwealth Act should be amended to include an objects provision.

Recommendation 6: The Commonwealth Act should require organisations to take all reasonable steps to inform employees that a statement has been submitted.

Recommendation 7: Reporting entities under the Commonwealth Act should be required to assess and report on their compliance with their broader labour obligations, including meeting the National Employment Standards, correctly paying workers and providing conditions as set out in the relevant Award or enterprise agreement.

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Introduction

There are an estimated 49.6 million people who are in modern slavery on any given day, including nearly 28 million in forced labour. Devastatingly, over 12 million victims of modern slavery are children. According to the global estimates for 2021, our region, the Asia-Pacific, accounted for almost two-thirds of all victims globally with 29,349 million victims of modern slavery.¹

Alarming, the number of people in modern slavery has risen sharply in the last five years. 10 million more people were in modern slavery in 2021 compared to 2016 global estimates. This is despite increasing focus from governments across the world in combatting the problem.

There also have over this time been other catastrophes such as the COVID-19 pandemic and armed conflicts that have made monitoring, enforcement and compliance activity more difficult and created an elevated level of risk of worker exploitation and modern slavery more broadly.

Under United Nations Sustainable Development Goal (SDG) 8: Decent Work and Economic Growth, the world has agreed to end modern slavery when it comes to children by 2025 and more generally by 2030².

If Australia is to play its role in giving effect to SDG's noting the prevalence of modern slavery in the Asia Pacific region and live its ethos of a "fair go" for all and "leaving no one behind", a robust Modern Slavery Act 2018 (Cth) is crucial.

Alarming, modern slavery-like conditions continue to arise in Australian workplaces. There is a spectrum of exploitative work practices in large and small businesses. While

¹ Global Estimates on Modern Slavery ILO, Walk Free, IMO pages 18- 20

² <https://www.un.org/development/desa/disabilities/envision2030-goal8.html>

some are more extreme than others, if left unchecked it signals to the community and the market that businesses can act with impunity and encourage the more serious labour practices such as debt bondage and forced labour. Together the unions in the RSCA cover the entirety of the retail supply chain and workers in these industries experience the full spectrum of exploitation. Some examples are highlighted in the box below.

Case studies in exploitation

7-Eleven

In 2016, Bharat Khanna, an international student, told his story of exploitation when working at 7 Eleven. Bharat worked 60 hours a week and was paid \$10 an hour. Bharat was told to “walk” by his employer when he queried his pay.

Rahul Patil, another international student, also spoke of his experiences when working at 7 Eleven. Rahul too earned \$10 an hour and a year later this was increased to \$11 an hour. Rahul was paid \$200 - \$300 ‘extra’. The manager would then ask him to withdraw the ‘extra money’ so he could pay other staff in cash.

Stories like Bharat’s and Rahul’s were just two of the many and commonplace across the 7 Eleven franchise.

Horticulture workers

Over the last decade Australia’s horticulture industry has arguably become the most exploitative in the country. At the same time, it has become the most reliant sector on overseas migrant workers, and incidentally an international chronicle for obscene and inhumane workplace abuse and acts of modern slavery.

The extent of exploitation in the horticulture industry is undeniable, uncovered empirically by countless parliamentary inquiries, government taskforce reports, and media reporting. In its Harvest Trail Inquiry, the FWO found that 67% of all growers surveyed were employing overseas workers. Further, it reported that temporary visa holders are more vulnerable to exploitation due to a higher incidence of cultural

and language barriers, low awareness of workplace rights and barriers to accessing assistance. It also recognises that the anchoring of visa status to employment means that workers can be made to feel ‘captive’ to their employer. The final report of the Federal Government’s Migrant Worker Taskforce also noted the inextricable link between the increasing number of temporary visa holders and the systemic spread of underpayment and risk of exploitation.

Many migrant workers are vulnerable to inflated deductions from pay for accommodation and ‘social levies’, which are obfuscated amongst complicated employment arrangements. In one instance, a quarter of workers’ pay was cut to live in a four-bedroom home housing 8 adults.³ This was also the case when the Australian Federal Police and the Australian Border Force commenced an investigation into labour exploitation in Victorian farms after further wage theft of Fijian workers was uncovered.⁴ In 2021 under the Seasonal Worker Program (now the Pacific Australia Labour Mobility program), 70 workers were living in one house in Tasmania and paying up to \$130 a week in rent.⁵

Gig Platform Workers

Gig transport workers are some of the most exploited workers in Australia today. From food delivery to rideshare to parcel delivery these workers are not even recognised as employees and afforded little protection under the current industrial regime – although some states have moved to regulate gig workers. In 2020 a TWU and Delivery Riders Alliance survey found that:

- the average hourly rate for a food delivery worker after costs was **\$10.42**
- 88.72% of workers have noticed that payments have reduced over time
- 82.99% of those injured received no support from the food delivery company they worked for

³ <https://www.abc.net.au/news/2020-06-11/pacific-island-scheme-wages-deducted-high-rent-inverell/12336278>

⁴ <https://www.abc.net.au/news/2019-11-16/police-probe-alleged-exploitation-of-fijian-workers-in-victoria/11626930>

⁵ <https://www.abc.net.au/news/2020-02-14/seasonal-worker-program-under-scrutiny-after-70-people-in-house/11960818>

- Contrary to public perception, 86.12% of respondents are dependent on food delivery work as their main source of income

Amazon Flex

Since the introduction of Amazon Flex in Australia, the TWU has already found Amazon is engaging in the underpayment of workers below national minimum standards and dangerously undermining safety standards. Drivers have reported:

- Earning between \$10-15 per hour on average after costs,
- Regularly overloading vehicles (commonly personal cars) to a point where driving vision is dangerously obstructed,
- Delivering packages which require two or more people to carry and transport,
- Feeling pressured to engage in dangerous road practices in order to complete an unrealistic number of deliveries in short windows,
- Insufficient training to workers with all training limited to a short 2-minute training video covering safety, manual handling, and use of the app prior to commencement of work.
- Drivers are not compensated for additional hours worked to complete the heavy loads and can be disciplined – including with termination – if they fail to complete their deliveries within the allocated time.

The operations of Amazon Flex have the shine of exciting new digital technology providing a valuable source of employment. In reality, these workers are engaged in digital modern-day slavery where their interactions with the company are all via an app with numerous barriers to seeking redress or to escalating to a human when things go wrong.

This submission will respond to the following elements of the review:

1(c) Whether additional measures to improve compliance with the Act are necessary or desirable such as civil penalties for failure to comply with the requirements of the Act.

1d) Whether a further review of the Act should be undertaken, and if so, when?

1e) Whether it is necessary or desirable to do anything else to improve the operation of the Act and any rules?

Overview of the Act

The Commonwealth Act took effect in 2019. The original *Modern Slavery Act 2018* (NSW) (NSW Act) was passed in 2018 but was amended significantly before it came into effect on 1 January 2022.

At a high level, the Commonwealth Act requires certain entities to report on how they address modern slavery risks in their domestic and global operations and supply chains. This sets out a framework that encourages transparency by organisations on where modern slavery could exist in their supply chains, allows those organisations to compare themselves to their peers in their efforts, and also allows the broader community to evaluate and encourage stronger action on modern slavery measures.

In and of itself, it is difficult to link the reporting requirements of the Act to changes in behaviour by organisations. Presently the Act does not impose a specific requirement of due diligence on organisations to investigate their supply chains. The Alliance supports the proposal by the ACTU to introduce a human rights due diligence obligation on reporting entities.

The Act sits alongside Australia's international obligations. For example, the UN Guiding Principles on Business and Human Rights were unanimously adopted by the

UN Human Rights Council in 2011, and set out a responsibility (albeit not legally binding in Australian law) that all business enterprises undertake human rights due diligence.

Nonetheless, based on our observations of the Act's operation so far, the RSCA makes the following recommendations for changes to the Act.

Changes to the Act

Penalties

While there has been an uplift in “statements likely compliant” from the first reporting period to the second, there is still a significant percentage of statements that are “likely not compliant”.

Penalties for non-compliance do not exist under the Commonwealth Act.

Penalties for non-compliance with mandatory reporting of risks of modern slavery occurring within supply chains, commercial organisations and government agencies is an important tool to ensure all reporting entities are meaningfully reviewing their supply chains and operations and to consider specific actions to assess and control risks of modern slavery, including due diligence and remediation processes.

Recommendation 1: The Commonwealth Act should provide for penalties for non-compliance with mandatory reporting.

Reporting Threshold

Under the original NSW Modern Slavery Act, the reporting obligation applies to reporting entities with not less than \$50 million in annual turnover compared to \$100 million under Commonwealth Modern Slavery Act. We note that lowering the threshold to \$50m will capture an additional 2300 businesses noting that some businesses currently captured may be reporting voluntarily at present.

We note that under the UK Modern Slavery Act the reporting obligation applies to businesses with an annual turnover of £36 million or more which is around \$A63 million.

As a general principle, entities should only be exempt from reporting under the Commonwealth Act if the costs of compliance outweigh the benefits. Consequently, the Commonwealth Act's reporting requirements should apply to:

- a) Any businesses with a turnover of more than \$50 million (rather than the current \$100 million), including not-for-profits.
- b) Businesses which meet the turnover threshold, but have less than 20 employees.
- c) Businesses which do not meet the turnover threshold, but employ more than 20 employees in a high-risk sector (such as agriculture, or those employing large numbers of temporary visa holders).

Recommendation 2: As a general principle, entities should only be exempt from reporting under the Commonwealth Act if the costs of compliance outweigh the benefits. Consequently, the Commonwealth Act's reporting requirements should apply to:

- a) Any businesses with a turnover of more than \$50 million (rather than the current \$100 million), including not-for-profits
- b) Businesses which meet the turnover threshold, but have less than 20 employees
- c) Businesses which do not meet the turnover threshold, but employ more than 20 employees in a high-risk sector (such as agriculture).

Anti-Slavery Commissioner

The NSW Act includes the establishment of an independent Anti-Slavery Commissioner. The Commonwealth Act should also include the establishment of a well-resourced Anti-Slavery Commissioner with a broad remit including to:

- a) advocate and promote action to combat modern slavery
- b) prevent, detect, investigate and prosecute offences involving modern slavery
- c) co-operate with and work jointly with government and non-government agencies and bodies, which would include Unions and educational institutions, to combat modern slavery.
- d) Develop codes of practice for the purpose of providing guidance including for high risk businesses in identifying modern slavery taking place within their supply chains and steps that can be taken to monitor and remediate identified risks.
- e) Provide assistance and support to victims of slavery.
- f) Raise awareness within the Australia community of modern slavery.
- g) Co-operate and engage with their NSW counterpart.

The Anti-Slavery Commissioner should be required report annually to Parliament about, inter alia, the Commissioner's activities, recommendations for changes to legislation or administrative action as a result of its exercise of the Commissioner's functions.

Parliamentary Committee to work with Anti-Slavery Commission

To compliment the work of the NSW Anti-Slavery Commissioner in combating modern slavery, the NSW Act establishes a Modern Slavery Committee with members from both Houses of Parliament. Its remit is to inquire and report on matters of modern slavery and report to both Houses of Parliament. Once the report has been tabled in

a House of Parliament, the NSW Commissioner may provide a response to the report of the Committee.

For appropriate oversight, to compliment the work of the Commonwealth Anti-Slavery Commissioner and to enable victims, Unions, civil society, the religious community, academia and others an appropriate forum with the power to gather and evaluate information and make appropriate recommendations relating to modern slavery, the Commonwealth Act should include the establishment of a Parliamentary Modern Slavery Committee.

Recommendation 3: The Commonwealth Act should establish a role for an Anti-Slavery Commissioner, supported by a Parliamentary Committee to provide oversight of the Act.

Victim support and compensation / National Compensation Scheme

The Parliamentary Inquiry report, *Hidden in Plain Sight: An Inquiry into Establishing a Modern Slavery Act in Australia*, recommended that it should include measures to support victims of slavery, including ‘establishing a national compensation scheme.’ The Commonwealth Act does not contain direct provisions to improve support for victims or improve access to remedies including State-based compensation schemes.

In Australia, there are currently eight different victims of crime compensation schemes available to survivors of modern slavery. However, only having State and Territory schemes is problematic as there are inconsistencies between the various schemes; differences in eligibility criteria; differences in maximum compensation entitlements; and are not designed for the specific circumstances of modern slavery. A victim who

has been trafficked between multiple States and Territories may be required to make separate state-specific applications for compensation.

Australia is a signatory to numerous conventions and treaties that require it to provide access to effective remedies to victims of human trafficking, slavery, and slave-like practices. These include:

- article 6(6) of the Trafficking Protocol, which requires each state party to ensure that its domestic legal system provides victims of human trafficking with the possibility of obtaining compensation for damages suffered;
- article 25(2) of the United Nations Convention Against Transnational Organized Crime, which requires each state to 'establish appropriate procedures to provide access to compensation and restitution for victims of offences covered by the Convention;
- article 1 of the ILO Forced Labour Protocol, obliges members 'to provide to victims protection and access to appropriate and effective remedies, such as compensation;'
- article 12 of the United Nations Declaration of Basic Principles of Justice for Victims of Crime and Abuse of Power, which states that 'when compensation is not fully available from the offender or other sources, States should endeavour to provide financial compensation to: Victims who have sustained significant bodily injury or impairment of physical or mental health as a result of serious crimes; The family, in particular dependents of persons who have died or become physically or mentally incapacitated as a result of such victimization'; and

- part II article 2(3)(a) of the International Covenant on Civil and Political Rights which requires each state party to 'ensure that any person whose rights or freedoms as herein recognized are violated shall have an effective remedy, notwithstanding that the violation has been committed by persons acting in an official capacity.'

A national compensation scheme will also ensure that Australia fulfils priority 2 of the National Action Plan to Combat Modern Slavery 2020-25 by establishing a consistent and effective remedy to support victims. It would provide an effective remedy for survivors of modern slavery: by providing financial security to reduce vulnerability and the risk of re-trafficking; enable survivors to better re-integrate into communities; provide acknowledgement of the harm that survivors have suffered; and may contribute to the punishment of traffickers.

A national compensation scheme would coexist with the criminal justice penalties so that where an offender has been convicted of an offence in divisions 270 of 271 of the Criminal Code Act 1995 (Cth), victims may be able to obtain monetary redress under section 21B of the Crimes Act 1914 (Cth), at the conclusion of the criminal trial before the case has been finalised.

Since convictions in modern slavery are rare, this remedy is not an option for many survivors. Even where a conviction is obtained, there are numerous challenges: high standard of proof; difficulty accessing legal representation; prohibitive costs associated with the preparation of an application; re-traumatisation for victims participating in the process of making an application; and ambiguity over outstanding legal issues.

The scheme would be designed to complement the already established State and Territory compensation schemes to provide a pathway for victims of federal modern slavery crimes to seek compensation.

Compensation for survivors can assist their recovery and reintegration into society. A victim should be able to apply for compensation irrespective of when the victimisation occurred. Remedies must be available for victims who were exploited before slavery and slavery-like practices were criminalised.

The scheme should be designed by taking into account that many survivors may find it difficult to quantify the harm they have suffered, influencing the eligibility criteria and the standard of proof required.

The Scheme could be modelled on other Commonwealth schemes such as the Australian Victims of Overseas Terrorism Payments Scheme (AVOTPS) and the National Redress Scheme (NRS), which provide a streamlined remedy to victims without any requirement of an admission of liability.

The NRS establishes an accessible, survivor-focused and trauma-informed application process that facilitates access to redress which consists of a monetary payment in recognition of the wrong suffered by survivors of institutional sex abuse. Redress payments are determined on an individual basis, are non-taxable and exempt from income tests related to Commonwealth government payments. The process has a different standard of proof – the decision-maker determines whether there is a ‘reasonable likelihood’ that the abuse occurred.

The National Compensation Scheme could be funded primarily by the proceeds of confiscated assets, by amending the Proceeds of Crime Act 2002 (Cth) to require that the proceeds of crime in human trafficking and slavery cases be used to fund

compensation or reparation for victims. Secondly, companies could be required to pay a lodgment fee when lodging their Modern Slavery Statement, fees that would contribute to a victims support fund. Furthermore, there could be an opt-in mechanism or claw back provision for companies and/or supply chains where victims are identified and compensated.

The statutory compensation scheme will need to interact with reparation orders and other related payments, including claims for unpaid wages, and procedures for seeking recompense from the offender. Reparation provisions in the Crimes Act should be retained to minimise victims' restrictions to access assistance. These remain a useful avenue in situations where the defendant has been identified, convicted and has sufficient assets to pay for the harm caused.⁶

Recommendation 4: The Commonwealth should establish a national compensation scheme for victims of modern slavery.

Objects of the Act

Although the issues paper for this review identifies a number of objectives for the Commonwealth Act (namely, that it is aimed at increasing awareness of modern slavery risks, and supporting entities in identifying, reporting and addressing those risks), the Act itself does not specify objectives. The RSCA supports adopting formal objectives into the Act. The NSW Act provides an indicative example, including various aims, particularly:

- (a) to combat modern slavery,
- (b) to provide assistance and support for victims of modern slavery,

⁶ Frances Simmons et al, 'Modern Slavery and Material Justice: The Case for Remedy and Reparation' (2022) 45(1) *UNSW Law Journal* 182.

- (c) to provide for an Anti-slavery Commissioner,
- (d) to provide for detection and exposure of modern slavery that may have occurred or be occurring or that is likely to occur,
- (e) to raise community awareness of, and provide for education and training about, modern slavery,
- (f) to encourage collaborative action to combat modern slavery,
- (g) to provide for the assessment of the effectiveness and appropriateness of laws prohibiting modern slavery and to improve the implementation and enforcement of such laws,
- (h) to provide for mandatory reporting of risks of modern slavery occurring in the supply chains of government agencies,
- (i) to make forced marriage of a child and certain slavery and slavery-like conduct offences in New South Wales,
- (j) to further penalise involvement in cybersex trafficking by making it an offence to administer a digital platform for the purpose of child abuse material or encourage another person to use a digital platform to deal with child abuse material,
- (k) to provide for education, training and guidance about identifying and addressing modern slavery taking place within supply chains of organisations.

Recommendation 5: The Commonwealth Act should be amended to include an objects provision.

Government Procurement

The RSCA supports the Commonwealth Act extending to ensure the procurement of goods and services by Commonwealth Government agencies are not the product of modern slavery.

At the time of the 7-Eleven wage scandal, the SDA called on the NSW Government to put a stop to selling Opal cards through the 7-Eleven store network at a time that the Company was engaged in rampant exploitation of its workers. The NSW Government failed to act.

Similarly, government procurement of goods such as courier and parcel services should ensure only companies that do not encourage or base their business model on exploitative practices like Amazon Flex are utilised.

Publication of Modern Slavery Statements

The RSCA believes that when it comes to reporting and notification, the Commonwealth Act should adopt the model found in the Workplace Gender Equality Act 2016 (Cth). In effect, this would mean that when a commercial organisation lodges its modern slavery statement with the Anti-Slavery Commissioner, they would be required to take all reasonable steps to inform employees that a statement has been submitted. This facilitates employees in understanding and engaging with modern slavery issues in the organisations they work for.

Recommendation 6: The Commonwealth Act should require organisations to take all reasonable steps to inform employees that a statement has been submitted.

Further review of the Act

Given that the framework for the Act, and this review, describes the process of eliminating modern slavery as a ‘race to the top’, it makes sense that obligations on organisations are reviewed and tightened over time. As a result, the RSCA supports a 5-yearly periodic review process for the Act considering organisations’ progress in meeting the aims of the Act, and advancements in other jurisdictions.

Other matters which have an impact on combating exploitation

While much of this submission has focused on the efficacy and operation of the Act, it is important to contextualise the experience of modern slavery and slavery-like conditions within the Australian economy. The drivers of labour exploitation are often like the drivers of modern slavery and therefore the solutions are similar.

The view of the Alliance is that these practices are allowed to flourish where workers hold visas that are dependent on their employer, often in industries known for their low labour costs business model or restrictions placed on their ability to work. Many of these workers are unaware of their rights or how to seek assistance, face language barriers, and their industries little union oversight to ensure the enforcement of workers' rights.

That's why the Alliance believes it is important for the Commonwealth Act and policy settings to address the underlying causes of exploitation not just the symptoms (e.g. visa amnesties while welcome and necessary will not end modern slavery). For this reason, entities required to report under the Commonwealth Act should be required to assess and report on their compliance with their broader labour obligations, including meeting the National Employment Standards, correctly paying workers and providing conditions as set out in the relevant Award or enterprise agreement.

Recommendation 7: Reporting entities under the Commonwealth Act should be required to assess and report on their compliance with their broader labour obligations, including meeting the National Employment Standards, correctly paying workers and providing conditions as set out in the relevant Award or enterprise agreement.

The most crucial element to combating modern slavery and those vulnerable to exploitative practices is to ensure they have a strong collective voice. It is not surprising that the industries and sectors with a higher risk of modern slavery are those that have either very low or no union membership. The Alliance argue for a collective voice because we know that even if individual rights were granted or amnesties

provided, the ability of workers to exercise their rights does not exist without support. Unions as the collective voice of workers are also more likely to succeed in exposing systemic abuse and hold those responsible for exploitative practices to account on an employer and industry basis.

The Alliance recommends that prior to commencing work in Australia and upon arrival it is important for every migrant to receive a worker briefing about their rights in Australia from the ACTU or relevant union in the industry (as is done in the Pacific Australia Labour Mobility program).

Wage theft is also systemic amongst migrant workers and rampant in many sectors. The existing enforcement measures are inadequate. Many, like gig workers fall outside the system entirely. It also penalises businesses who do the right thing by undercutting labour costs. Workers cannot safely report exploitation with the threat (real or not) of deportation. Further we have seen employers time and again threaten people's visa if they refuse a direction.

For these reasons, the Alliance believes that, in the long-run, a transition to an approved employer program is necessary for temporary migrant labour. This means:

- Employers have to be approved in advance.
- Employers are subject to site visits and audits.
- Employers have to provide an induction for workers and invite the FWO and unions.
- Employers can be suspended for non-compliance.
- Employers are subject to monitoring by the FWO.

The Alliance believes that these protections should form the basic standard of Australia's temporary migration program and will go a long way to combating modern slavery.

Conclusion

We have seen disgraceful examples of rampant worker exploitation like the 7-Eleven wage scandal and others outlined in the introduction to this submission. Reporting obligations on companies to describe the risks of modern slavery practices “...in the operations and supply chains of the organisations...” and more importantly the actions to assess and address those risks including due diligence and remediation process are positive steps to eliminate modern slavery. This submission puts forward a number of opportunities to continuously improve the obligations applying to organisations under these laws.