



Policy Brief

Modern Slavery and Human Trafficking

September 2025

Submitted by

Katherine Berney

Executive Director

Working with Women Alliance

<https://wwwa.org.au/>

Acknowledgement of Country

The Working with Women Alliance (WwWA) acknowledge the Traditional Owners of the land on which we work and live. We pay our respects to Aboriginal and Torres Strait Islander Elders past, present and future. We value Aboriginal and Torres Strait Islander histories, cultures, and knowledge. We extend our respect to Aboriginal and Torres Strait Islander women who for thousands of years have preserved the culture and practices of their communities on country. This land was never surrendered, and we acknowledge that it always was and always will be Aboriginal land. We acknowledge the strength of Aboriginal and Torres Strait Islander people and communities. We acknowledge that Australian governments have been complicit in the entrenched disadvantage, intergenerational trauma and ongoing institutional racism faced by Aboriginal and Torres Strait Islander people. We recognise that Aboriginal and Torres Strait Islander people must lead the design and delivery of services that affect them for better life outcomes to be achieved.

About Us

The Working with Women Alliance (WwWA) represents two key portfolios: National Women's Safety (NWS) and National Women's Equality (NWE). The WwWA connects the critical areas of gender-based violence prevention and the advancement of women's economic equality and leadership, bridging these important policy fields for greater impact. We work with members and stakeholders, including the Australian Government, to provide expertise and advice on gender equality and women's safety.

Contents

Executive Summary.....	4
Intersecting Experiences and Risk Factors	5
Gender.....	5
Children	5
Migrants and Visa-Holders	5
Sex Workers	6
People with Disabilities	6
Aboriginal and Torres Strait Islander People.....	7
Policy Landscape.....	7
Modern Slavery Act 2018	7
Criminal Code Act 1995	7
Migration Act 1958	8
Fair Work Act 2009.....	8
Support Landscape.....	8
Support for Trafficked People Program	8
Alternative Referral Pathway Pilot	9
Workplace Justice Pilot	9
Strengthening Reporting Protections Pilot	9
Evaluations of Pilots.....	9
Public Welfare and Healthcare Support.....	10
Summary of Key Issues	10
Gaps in the Legislation	10
Gaps in Law Enforcement.....	10
Gaps in Support.....	11
Recommendations	11

Executive Summary

The Australian Government has ratified a number of legal and institutional frameworks to combat modern slavery and human trafficking: The Department of Home Affairs, the Attorney General's Department, the Department of Social Services and the Department of Employment and Workplace Relations all contribute to hosting and enacting policies and frameworks that respond to modern slavery and human trafficking. Other relevant bodies include the Anti-Slavery Commissioner, the Fair Work Ombudsman, the Human Rights Commission, the Australian Federal Police (AFP), Australian Border Force (ABF), immigration and compliance officers, and stakeholder advisory committees.

The policy landscape is complex with discrepancies across departments, and weak interaction between legislative instruments. This briefing paper, along with the 2008-9 Australian National Audit Office,¹ the 2025 United Nations' Special Rapporteur Report,² the National Anti-Slavery Commissioner,³ the Parliamentary Joint Committee on Human Rights and others call for greater oversight and coordination between departments and cross-agency interventions that are standardised across jurisdictions.

Despite numerous legal frameworks, rates of prosecution for modern slavery and human trafficking offences remain low. In 2023-24 the AFP received only 382 reports,⁴ with the Australian Institute of Criminology estimating another four unidentified victims of slavery or trafficking for every identified victim.⁵ The Interdepartmental Committee on Human Trafficking and Slavery reported only 25 convictions in 2020, most of which were regarding sexual servitude and forced marriage.⁶ A significant barrier in investigating and prosecuting offenders is the unwillingness of victim-survivors to make reports due to fear of reprisal by perpetrators and/or law enforcement bodies that may result in arrest, visa cancellation, or deportation. A common indication of modern slavery is that victims rely on their employer for basic needs such as accommodation and healthcare. Despite inhumane conditions, victims are faced with the threat of losing that 'security' when making a disclosure. There are little to no legal protections that prevent the use of information disclosed when seeking help from being shared with immigration enforcement.

Access to social support for victim-survivors is limited and conditional. Eligibility for programs typically depends on engagement with law enforcement. There is no universal, trauma-informed support pathway for victims of slavery or trafficking, nor is there consistent accessibility to long-term supports such as housing, legal advocacy, mental health services, or employment placements. Access to public healthcare and welfare support is dependent on visa class and fulfilling visa conditions: Victims who disengage

from work due to exploitation may breach their visa conditions and resultingly, lose access to public supports.

This briefing paper calls for harmonisation across all departments and associated legislation, robust legal protection for visa-holders who make disclosures of exploitation, and universal access to social support for victim-survivors.

Intersecting Experiences and Risk Factors

Gender

Modern slavery and human trafficking offences are gendered in nature, with reports most associated with forced marriage and sexual servitude.⁷ In 2024, 94% of victims referred to the Support for Trafficked People Program were women, and 44% were younger than 18.⁸

Children

Australia has seen increasing instances of child sexual exploitation.⁹ This includes sexual violence in domestic and religious settings, online child pornography, including live streaming, and travelling abroad for the purposes of ‘child sex tourism.’¹⁰ The risk of child sex trafficking is increasing through the prevalence of online grooming and technology-facilitated sexual exploitation. In 2018, the Australian Centre to Counter Child Exploitation’s Child protection Unit received 18,000 reports of child sexual exploitation.¹¹ The eSafety Commissioner reports that one in eight children are coerced into producing child sexual abuse material.¹²

Migrants and Visa-Holders

Temporary visa-holders, asylum seekers and refugees face disproportionately high risks of experiencing modern slavery, human trafficking and many other human rights abuses. Working visa-holders are concentrated in ‘high risk’ sectors such as agriculture, horticulture, cleaning, healthcare and social assistance where there is little legal oversight or compliance monitoring.¹³ The risk is especially high for visa-holders with limited or no working rights; access to Medicare is conditional on having the right to work. 55% of asylum seekers have experienced some form of homelessness in Australia.¹⁴ Many women suffer exploitation and sexual slavery due to limited access to trauma-informed specialist support upon arrival in Australia,¹⁵ especially when transitioning from detention centres where institutional violence and human rights violations are normalised.¹⁶

The visitor visa is the most held visa among victims of slavery or trafficking, with 48% of the 5.7 million visas accepted in 2018-19 automatically granted.¹⁷ This leaves limited

opportunities for intervention in suspected cases of slavery or trafficking. The partner visa (accounting for 90% of the family visa stream) is the second most exploited visa in Australia.¹⁸

Sex Workers

Sex work is not yet fully decriminalised in Australia. The lack of harmonisation across states and territories impedes sex workers' access to victim support and legal counsel in cases of sexual violence and worker exploitation.

Law enforcement authorities leverage their responsibility to combat human trafficking to raid premises owned and occupied by migrant sex workers, increasing their risk of deportation.¹⁹ Women and gender-diverse people, particularly those from South-East Asia have been targeted for deportation under operation Inglenook²⁵ conducted by the ABF under the guise of preventing sexual exploitation and trafficking.²⁰ The Scarlet Alliance Asian Migrant Sex Worker Advisory Group described Inglenook as "government-funded harassment and discrimination."²¹ Targeting of sex workers is being exacerbated by the Modern Slavery Act which creates obligations for entities to eliminate modern slavery from their supply chains. However, entities commonly conflate sex work and modern slavery, resulting in unintended consequences for sex workers.²²

It is well evidenced that most trafficking and slavery crimes occur outside of the sex work industry, driven rather, by poverty, inaccessible migration pathways, and a lack of information and support services for at-risk people.²³ The Scarlet Alliance have raised concerns that unwarranted scrutiny on sex workers will drive migrants who are fearful of deportation underground, increasing their risk of being trafficked.²⁴

People with Disabilities

People with disabilities, particularly those in segregated workplaces experience an increased risk of worker exploitation. The Supported Wage System sets wages according to 'assessed productivity,' allowing employers to pay workers with disabilities below minimum wage, receiving as little as \$3.12 per hour for an award that would otherwise be paid \$24.95 per hour.²⁵ The Disability Discrimination Act 1992 currently exempts such arrangements from being considered unlawful discrimination.²⁶

People in segregated employment experience an increased risk of violence due to the closed nature of the environment.²⁷ Additionally, people with disabilities face an increased risk of forced marriage. This may be due to family members seeking permanent care arrangements, or the inability of individuals to report or resist due to social and financial dependence on others for daily living needs.²⁸ People with disability may also be targets of

financial abuse, with perpetrators of forced marriage benefitting from NDIS funding, the Disability Support Pension and Carer's Payments.²⁹

Aboriginal and Torres Strait Islander People

Australia's colonial history has seen domestic and sexual servitude forced upon Indigenous Australians through wage theft and forcible child removal. The placement of children in culturally inappropriate settings increase their risk of experiencing exploitation.³⁰

Policy Landscape

The interaction between Australia's legislative instruments, national frameworks and support services for victim-survivors is weak, meaning that rates of prosecution for modern slavery and human trafficking offences remain low, and access to social support for victims is inadequate. This section provides an overview of several legislative instruments and the departments and agencies associated with enforcing them.

Modern Slavery Act 2018

The Modern Slavery Act is concerned with corporate transparency and reporting obligations of businesses with an annual revenue over \$100 million.³¹ The objective of this legislation is to disrupt supply chains that involve slavery practices. Businesses submit annual statements to the Attorney General's Department to ensure compliance with the Act, however, penalties for non-compliance remain at the proposal stage and have not yet been passed.³² The Statutory Review of the Act noted it had been successful in encouraging proactive steps in preventing slavery, but there has been no evidence of meaningful change for people living in conditions of modern slavery.³³ The Anti-Slavery Commissioner, established with the Modern Slavery Act, also supports the Attorney General in enforcing these reporting obligations. At current, the Modern Slavery Act imposes no penalties for failure to report and has no import-ban on goods made with forced labour, the Anti-Slavery Commissioner commenting that Australia has one of the "weakest regimes in dealing with forced labour."³⁴

Criminal Code Act 1995

The Attorney General also has legislative oversight of the Criminal Code Act, Divisions 270 and 271.³⁵ These divisions of the legislation criminalise modern slavery and human trafficking perpetrated by Australian citizens. At the enforcement level, the Australian

Federal Police are responsible for investigating all alleged offences under the Criminal Code.

Migration Act 1958

The Migration Act is administered by the Department of Home Affairs, with the objective of preserving integrity and removal of ‘unlawful’ migrants. The Act contains frameworks to prevent the misuse of Australia’s visa programs, encouraging employers to uphold appropriate working conditions and fair recruitment processes. It also contains offences to deter the exploitation of non-citizens in Australia, reinforcing Divisions 270 and 271 of the Criminal Code.

Fair Work Act 2009

Fair Work legislation³⁶ is administered through the Department of Employment and Workplace Relations, pertaining to incidences of worker exploitation that may not reach the threshold of slavery or trafficking under Criminal Code Act. The intention of the Act is to promote fair work environments by establishing minimum standards and protections for employees. It hosts bodies such as the Fair Work Commission and Ombudsman who are responsible for compliance checks and enforcement of workplace laws, particularly for labour hire companies and employers linked to the Pacific Australia Labour Mobility (PALM) scheme. Crimes that may be resolved under the Fair Work Act include wage theft, retention of passports, deceptive recruitment, or corrupting benefits.³⁷

Support Landscape

Victim-survivors require assurance of their safety to make disclosures. Australia currently does not offer comprehensive legal or social protections. This results in a lack of reporting and cooperation with enforcement bodies: making it difficult for the AFP to administer the Criminal Code Act, and the Attorney General in enforcing the Modern Slavery Act. Fear of reporting is exacerbated for temporary visa-holders who fear retaliation by perpetrators and face the risk of visa cancellation when engaging with law enforcement. Existing social support systems are time-limited and contingent on law enforcement cooperation rather than focused on victim needs or justice outcomes.³⁸ This section provides an overview of the existing support services and protections available to victim-survivors.

Support for Trafficked People Program

The Department of Social Services provides support for victim-survivors through the Support for Trafficked People Program (STPP), established in the National Action Plan. The

program is delivered by Red Cross Australia and provides both fiscal and social support through access to accommodation, healthcare, counselling, referral to legal services, skills development and interpreters. The program also provides different support streams and visa extensions according to the circumstances under which the allegations are made.

Alternative Referral Pathway Pilot

Due to the reluctance of victim-survivors to make disclosures to law enforcement bodies, The Salvation Army was funded to provide an additional referral pathway that was piloted in 2024-25 and does not require reporting through law enforcement. However, the program is not available to children under 16 without a guardian, meaning that victims of forced marriage and other slavery practices perpetrated by their parents are excluded from the service.³⁹

Workplace Justice Pilot

The Government has taken steps to address labour exploitation through the pilot of the Temporary Activity visa which allows visa-holders who have experienced exploitation to remain in Australia for 6-12 months, expandable to four years to pursue legal action against employers. However, this visa has requires that individuals already hold a visa with work rights that expires in 28 days or expired in the past 28 days, deeming many visa-holders ineligible.⁴⁰ Migrants who do fall within these 28-day periods still may not be eligible as the Temporary Activity visa only applies to cancellations under section 116 (1) (b) of the Migration Act, but many cancellations occur under 116 (1) (g).⁴¹

Strengthening Reporting Protections Pilot

New protections for visa-holders offer visa security for people who have breached their visa conditions due to exploitation, allowing victims to make disclosures without fear of becoming undocumented. To access the reporting protections, visa-holders must have their workplace exploitation matter certified by a government agency or accredited third party before notifying Home Affairs.⁴²

Evaluations of Pilots

The rollout of these pilots did not include additional funding for providers such as the Red Cross, resulting in organisations being overwhelmed and support services reportedly inaccessible to a substantial number of exploited migrants.⁴³ This makes assessing and evaluating the pilots difficult as usage of the support systems has not necessarily increased due to limited capacity. An evaluation of the Alternative Referral Pathway Pilot will be published after its completion in November 2025.⁴⁴

Public Welfare and Healthcare Support

Certain visa-holders are ineligible for Medicare and income support payments, with many temporary-visa-holders' access to Medicare conditional on their working rights and visa compliance. This limits workers' freedom and mobility: The NSW parliamentary inquiry found that visa-holders are having abortions with absence of choice.⁴⁵ One doctor claimed that 95% of visa-holding workers would have an abortion to keep their visas as they are at risk of breaching the visa conditions due to not working during pregnancy or childcare.⁴⁶ Because income, healthcare, accommodation and access to social security are often employer-provided, visa-holders who do have children face serious risk of poverty, homelessness, ill-health and ultimately, deportation.⁴⁷

Between 2004 and 2021, there have been a total of 1,670 cases of modern slavery detected, with only 31 offenders convicted (ASA).⁴⁸

Summary of Key Issues

Gaps in the Legislation

Survivors of exploitation, slavery-like practices or trafficking lack robust, legislated visa protections or a guaranteed pathway to permanent residency.

There is no enforceable legislative firewall that exists to prevent information disclosed for help (e.g., to the AFP or support agencies) from being used for immigration enforcement, aside from very narrow circumstances. Victims, especially on temporary visas, remain at risk of deportation, visa cancellation, or employer retaliation if they speak out about exploitation.

Gaps in Law Enforcement

Because of this disincentive for victims or witnesses to make disclosures, there are low rates of prosecution for offences under Divisions 270 and 271 of the Criminal Code Act and ineffective disruption of supply chains involving slavery or trafficking through the Modern Slavery Act. Additionally, the Migration Act continues to focus on integrity and removal of “unlawful” migrants, rather than systemic recognition/protection of trafficked or exploited individuals.

There is insufficient systemic focus on unscrupulous employers, migration agents, and labour hire intermediaries who exploit visa vulnerabilities and create the conditions for modern slavery. At-risk visa groups (e.g., visitor, partner, protection, or skills-in-demand

visas) do not have tailored safeguards when exploitation is detected or suspected, leaving these cohorts vulnerable.

Madec, one of Australia's largest labour hire firms (and registered charity) made more than \$200 million in revenue in 2022-23, with 84% generated from labour-hire. Testimonies claim that the same firm has corrupted benefits, charging enormous sums for accommodation and utilities and leaving workers with \$224 of take-home pay per week. Another labour hire firm, McCrystal faced legal action by the Fair Work Ombudsman for unlawfully fining workers for drinking alcohol on site, collecting a total of \$14,500 over three months. NSW Anti-Slavery Commissioner commented that "risks of serious penalty for engaging in these practices are so low that it is rational, from an economic perspective, to take that risk and engage in overcharging, deceptive recruitment, and effective debt bondage of workers."

Gaps in Support

Eligibility for victim support programs typically depends on engagement with law enforcement. There is no universal, trauma-informed access pathway for any person at risk or experiencing modern slavery. Long-term supports, such as housing, legal advocacy, mental health, or job placement, are not consistently accessible—especially for those outside capital cities or in certain visa classes. Eligibility for the Support for Trafficked People Program requires citizenship or a valid visa, excluding undocumented migrants.⁴⁹

Though the need for broader, cross-sectoral, trauma-informed approaches is recognised, these remain underfunded and are not yet embedded in national policy or legislation. Service providers themselves have noted a lack of sufficient training and guidance in being able to provide culturally appropriate, trauma informed support.⁵⁰

Recommendations

Amend Relevant Legislation to Ensure Protections for Exploited Workers

The interaction between Australia's legislative instruments, national frameworks, accountability mechanisms and support services for victims of modern slavery must be made congruent.

Legal protections need to be consistent across all relevant legislation to assure victim survivors that disclosures made to support services will not be shared with immigration enforcement. Eliminating discrepancies requires cross-department coordination to

reinforce a singular message: Victims of modern slavery will be supported without their visa status being compromised.

This cannot be actioned without removing the eligibility condition that victim-survivors must engage with law enforcement in order to receive social support.

Provide a Pathway to Permanent Residency

The Support for Trafficked People Program is estimated to cost several thousand dollars per survivor for a period of less than 12 months.⁵¹ The national annual cost for broader exploitation programs is estimated at up to \$115 million for all temporary crisis and legal support provided to visa-holders who have been exploited.⁵² Additionally, there are long-term costs due to the high risk of repeated crisis interventions where permanent stability is not achieved. While survivors remain on temporary visas, relying on crisis support, their employment opportunities remain limited, resulting in ongoing fiscal costs.

Granting a permanent visa is estimated to cost between \$4,000 and \$5,000 in processing.⁵³ Permanent visa-holders quickly transition into workforce and tax-paying roles; empirical modelling suggests high labour market participation rates and reduced welfare dependency.⁵⁴ Costs are offset within several years by health, independence, increased earnings, taxes and community engagement.

Aligned with the UN Special Rapporteur, WwWA emphasises that the pathway to permanency must be harmonised across relevant departments and legislation.

Publish Trade Data

Current trade data published by the Government does not allow for sufficient traceability in supply chains. It deidentifies companies which undermines corporate accountability and limits the available interception points to disrupt supply chains.⁵⁵ The Government should make customs data publicly available so that businesses can scrutinise potential links to forced or child labour.⁵⁶

Publication of trade data will not only allow businesses to mitigate risks of engaging with modern slavery practices, but it will also encourage better corporate due diligence and reporting practices.

Ban on Importation of Good Produced Through Slave Labour

The Modern Slavery Act should include a ban on imported goods produced through forced labour. This would clarify where penalties are due and aid enforcement officers by

providing a stronger incentive for businesses to enact a positive duty in reducing their risk of engaging with slavery or trafficking.

Standardise Rights and Entitlements to Support for All Visa-Holders

Aligned with the recommendations made in the UN Special Rapporteur, WwWA affirms the need for minimum rights and entitlements for all visa-holders. Amendments to the conditions on specific visas should be made as follows:

- Abolish the 48 hours work a fortnight condition for Student visa-holders.
- Abolish the condition on Working Holiday visas to remain with one employer for the duration of their stay.
- Ensure all visa-holders are eligible for Medicare.
- Ensure equal access to the Workplace Justice visa and the Strengthening Reporting Protections pilot scheme for all migrant workers, including undocumented workers. and workers disengaged from the Pacific Australia Labour Mobility scheme.
- Reform the Bridging Visas regime by granting work rights to all asylum-seekers in order to prevent their exploitation.
- Expand eligibility criteria for the Support for Trafficked People Program to include undocumented migrant workers.

In addition to these amendments, WwWA recommends that visa-holders receive education on their rights and entitlements, and that these be delivered in a culturally appropriate and accessible format.

Ongoing Funding for Pilot Programs

Implementation of pilots through non-government entities requires proportional funding increases, and additional training so that service providers such as the Red Cross and Salvation Army can respond to increased demand and deliver the necessary services. Implementation of pilot programs must also include funding for evaluation to allow for accurate cost-benefit analysis and modelling.

Without ongoing funding, service providers and victim-survivors remain subject to pilot funding cycles; where progress is made but subsequently lost when the funding is exhausted. Pilot programs that are underfunded and un-evaluated are wasted potential.

The Government must invest in comprehensive evaluation of programs and ongoing funding for successful programs such as the Alternative Pathways Pilot which has been supported by the UN Special Rapporteur.

Decriminalise Sex Work

The decriminalisation of consensual sex work nationwide will improve the safety, dignity and access to justice and healthcare for sex workers.⁵⁷ It will also ensure that sex workers who have not been trafficked are not targeted by anti-trafficking measures such as operation Inglenook.

Ensure Comprehensive and Frequent Compliance Checks

With victim-survivors disincentivised from making reports of modern slavery or human trafficking, the onus is on Australia's compliance and enforcement bodies complete frequent and comprehensive compliance checks and impose necessary penalties. In particular, high-risk sectors, migration agents and labour hire companies should be scrutinised often. To ensure effective compliance monitoring, WwWA recommends:

- Strengthened cooperation with local, state and territory governments in facilitating regular health and safety inspections.
- Establish a national registration system for migration agents and labour hire companies.
- Establish a robust complaint mechanism to prompt compliance checks and respond to exploitative practices.

Create a Survivor Advisory Council

WwWA echoes the UN Report and the Parliamentary Joint Committee on Human Rights in affirming the importance of centring victim-survivors in policy design. We urge the Government to create a survivor advisory council that captures people with intersecting experiences of human trafficking and/or modern slavery.

End Notes

¹ Australian National Audit Office, (2009). *Performance Audit of the Attorney-General's Department, the Department of Immigration and Citizenship, the Australian Federal Police and the Department of Families, Housing, Community Services and Indigenous Affairs*.

https://www.anao.gov.au/sites/default/files/ANAO_Report_2008-2009_30.pdf

² United Nations Human Rights Council, (2025). *Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata**

<https://docs.un.org/en/A/HRC/60/28/Add.1>

³ Australian Anti-Slavery Commissioner, (2025). *Submission to the NSW Inquiry into modern slavery risks faced by temporary migrant workers*. <https://www.antislaverycommissioner.gov.au/system/files/2025-03/aasc-submission-to-nsw-inquiry-into-modern-slavery-risks-temporary-migrant-workers.pdf>

⁴ United Nations Human Rights Council, (2025). *Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata**

<https://docs.un.org/en/A/HRC/60/28/Add.1>

⁵ Australian Institute of Criminology, (2019). *Estimating the dark figure of human trafficking and slavery victimisation in Australia*. <https://www.aic.gov.au/publications/sb/sb16>

⁶ Interdepartmental Committee on Human Trafficking and Slavery, (2020). *Trafficking in Persons*.

<https://webarchive.nla.gov.au/awa/20220327120732/https://www.homeaffairs.gov.au/criminal-justice/files/report-of-the-interdepartmental-committee-on-human-trafficking-and-slavery-2017-2020.pdf>

⁷ Australian Institute of Criminology, (2024). *New Data Released on Human Trafficking and Modern Slavery in Australia*. <https://www.aic.gov.au/media-centre/news/new-data-released-human-trafficking-and-modern-slavery-australia>

⁸ Australian Institute of Criminology, (2024). *New Data Released on Human Trafficking and Modern Slavery in Australia*. <https://www.aic.gov.au/media-centre/news/new-data-released-human-trafficking-and-modern-slavery-australia>

⁹ United Nations Human Rights Council, (2025). *Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata**

<https://docs.un.org/en/A/HRC/60/28/Add.1>; Timothy Cubitt, Anthony Morgan, Rick Brown, *The overlap between viewing child sexual abuse material and fringe or radical content online*, <https://www.aic.gov.au/publications/tandi/tandi708>; Australian Centre to Counter Child Exploitation, (2024). *ACCCE Statistics*, <https://www.accce.gov.au/resources/research-and-statistics/statistics>

¹⁰ *ibid.*

¹¹ Australian Centre to Counter Child Exploitation, (2020). *Online Child Sexual Exploitation: Understanding Community Awareness, perceptions, attitudes and preventative behaviours.*,

https://www.accce.gov.au/sites/default/files/2021-02/ACCCE_Research-Report_OCE_acc.pdf

¹² eSafety Commissioner, (2023). *1 in 8 children coerced into producing child sexual abuse material remotely*, <https://www.esafety.gov.au/newsroom/media-releases/1-in-8-children-coerced-into-producing-child-sexual-abuse-material-remotely>

¹³ Fair Work Ombudsman, (2025). *Horticulture compliance report*, Australian Government, <https://www.fairwork.gov.au/sites/default/files/2025-06/Horticulture-compliance-report.pdf>

¹⁴ United Nations Human Rights Council, (2025). *Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata**
<https://docs.un.org/en/A/HRC/60/28/Add.1>

¹⁵ *ibid.*

¹⁶ People with Disability Australia, (2025). *Country visit to Australia – Further information*,
https://wwda.org.au/wp-content/uploads/2025/04/PWDA.LT_.Special-Rapporteur-Further-Information_WWDA-FPDN-NEDA_March2024.pdf

¹⁷ Department of Home Affairs, (2024). *Targeted review of Australia’s visa framework to identify and reduce vulnerabilities to human trafficking and modern slavery*, Australian Government,
<https://www.homeaffairs.gov.au/reports-and-pubs/files/targeted-review-napai20.pdf>

¹⁸ *ibid.*

¹⁹ United Nations Human Rights Council, (2025). *Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata**
<https://docs.un.org/en/A/HRC/60/28/Add.1>; Scarlett Alliance, *Companies are using the Modern Slavery Act to discriminate against sex workers*, <https://scarlettalliance.org.au/wp-content/uploads/Modern-Slavery-Act-Review-Position-Statement.pdf>

²⁰ United Nations Human Rights Council, (2025). *Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata**
<https://docs.un.org/en/A/HRC/60/28/Add.1>; Scarlett Alliance, (2024). *Submission to the TIP Report*,
<https://scarlettalliance.org.au/wp-content/uploads/2024-02-01-Scarlett-Alliance-Submission-to-the-TIP-Report-1-1.pdf>

²¹ *ibid.*

²² Scarlett Alliance, *Companies are using the Modern Slavery Act to discriminate against sex workers*,
<https://scarlettalliance.org.au/wp-content/uploads/Modern-Slavery-Act-Review-Position-Statement.pdf>

²³ Scarlett Alliance, (2023). *Key Issues for Asian Migrant Sex Workers: Our 2023 Agenda*,
<https://scarlettalliance.org.au/2023-key-issues-paper-asian-migrant-sex-workers/>

²⁴ Scarlett Alliance, (2024). *Submission to the TIP Report*, <https://scarlettalliance.org.au/wp-content/uploads/2024-02-01-Scarlett-Alliance-Submission-to-the-TIP-Report-1-1.pdf>

²⁵ United Nations Human Rights Council, (2025). *Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata**
<https://docs.un.org/en/A/HRC/60/28/Add.1>

²⁶ *ibid.*

²⁷ People with Disability Australia, (2025). *Country visit to Australia – Further information*,
https://wwda.org.au/wp-content/uploads/2025/04/PWDA.LT_.Special-Rapporteur-Further-Information_WWDA-FPDN-NEDA_March2024.pdf

²⁸ *ibid.*

²⁹ *ibid.*

³⁰ United Nations Human Rights Council, (2025). *Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata**
<https://docs.un.org/en/A/HRC/60/28/Add.1>

-
- ³¹ Federal Register of Legislation, (2024). *Modern Slavery Act 2018*, Australian Government, <https://www.legislation.gov.au/C2018A00153/latest/text>
- ³² Attorney-General's Department, *Modern Slavery Statements Register*, Australian Government, <https://modernslaveryregister.gov.au/>
- ³³ Professor John McMillan, AO, (2023). *Report of the statutory review of the Modern Slavery Act 2018 (Cth) The first three years*, Australian Government, <https://www.ag.gov.au/sites/default/files/2023-05/Report%20-%20Statutory%20Review%20of%20the%20Modern%20Slavery%20Act%202018.PDF>
- ³⁴ Ben Doherty, (2025). *Australia could be a 'dumping ground' for goods made for us with forced labour, anti-slavery tsar warns*, The Guardian, <https://www.theguardian.com/australia-news/2025/sep/01/australia-modern-slavery-laws-goods-made-with-forced-labour>
- ³⁵ Federal Register of Legislation, (2019). *Criminal Code Act 1995*, Australian Government, <https://www.legislation.gov.au/C2004A04868/2018-12-29/text>
- ³⁶ Federal Register of Legislation, (2017). *Fair Work Act 2009*, Australian Government, <https://www.legislation.gov.au/C2009A00028/2017-09-20/text>
- ³⁷ Fair Work Ombudsman, (2025). *Horticulture compliance report*, Australian Government, <https://www.fairwork.gov.au/sites/default/files/2025-06/Horticulture-compliance-report.pdf>
- ³⁸ Australian Red Cross, *Support for Trafficked People*, <https://www.redcross.org.au/migration/support-for-trafficked-people/>
- ³⁹ United Nations Human Rights Council, (2025). *Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata** <https://docs.un.org/en/A/HRC/60/28/Add.1>
- ⁴⁰ United Nations Human Rights Council, (2025). *Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata** <https://docs.un.org/en/A/HRC/60/28/Add.1>
- ⁴¹ *ibid.*
- ⁴² Department of Home Affairs, *Strengthening Reporting Protections Pilot*, Australian Government, <https://immi.homeaffairs.gov.au/visas/working-in-australia/work-rights-and-exploitation/strengthening-reporting-protections-pilot>
- ⁴³ United Nations Human Rights Council, (2025). *Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata** <https://docs.un.org/en/A/HRC/60/28/Add.1>
- ⁴⁴ Ministers for the Department of Social Services, (2024). *More pathways to support for victims and survivors of human trafficking*, Australian Government, <https://ministers.dss.gov.au/media-releases/15321>
- ⁴⁵ Australian Anti-Slavery Commissioner, (2025). *NSW Inquiry into modern slavery risks faced by temporary migrant workers*, <https://www.parliament.nsw.gov.au/lcdocs/other/21840/Australian%20Anti-Slavery%20Commissioner%20-%20AQoN%20-%20received%2010%20June%202025.pdf>
- ⁴⁶ Ewing, T., Schultz, A. (2025). *No health cover, no home, no money: The women forced to choose between their visa or their baby*, Sydney Morning Herald. <https://www.smh.com.au/national/no-health-cover-no-home-no-money-the-women-forced-to-choose-between-their-visa-or-their-baby-20250819-p5mo76.html>

⁴⁷ Ewing, T., Schultz, A. (2025). *No health cover, no home, no money: The women forced to choose between their visa or their baby*, Sydney Morning Herald. <https://www.smh.com.au/national/no-health-cover-no-home-no-money-the-women-forced-to-choose-between-their-visa-or-their-baby-20250819-p5mo76.html>

⁴⁸ Anti-Slavery Australia, (2025). *Slavery in Australia*. <https://antislavery.org.au/>

⁴⁹ United Nations Human Rights Council, (2025). *Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata**
<https://docs.un.org/en/A/HRC/60/28/Add.1>

⁵⁰ United Nations Human Rights Council, (2025). *Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata**
<https://docs.un.org/en/A/HRC/60/28/Add.1>

⁵¹ Department of Social Services, *Support for Trafficked People Program*, Australian Government, <https://www.dss.gov.au/human-trafficking-and-slavery/support-trafficked-people-program>

⁵² Brendan Coates, Trent Wiltshire, and Tyler Reysenbach, (2023). *Short-changed: How to stop the exploitation of migrant workers in Australia*, Grattan Institute, <https://grattan.edu.au/wp-content/uploads/2023/05/Short-changed-How-to-stop-the-exploitation-of-migrant-workers-in-Australia.pdf>

⁵³ Department of Home Affairs, *Fees and charges for visas*, Australian Government, <https://immi.homeaffairs.gov.au/visas/getting-a-visa/fees-and-charges>

⁵⁴ Brendan Coates, Trent Wiltshire, and Tyler Reysenbach, (2023). *Short-changed: How to stop the exploitation of migrant workers in Australia*, Grattan Institute, <https://grattan.edu.au/wp-content/uploads/2023/05/Short-changed-How-to-stop-the-exploitation-of-migrant-workers-in-Australia.pdf>

⁵⁵ United Nations Human Rights Council, (2025). *Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata**
<https://docs.un.org/en/A/HRC/60/28/Add.1>

⁵⁶ United Nations Human Rights Council, (2025). *Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata**
<https://docs.un.org/en/A/HRC/60/28/Add.1>

⁵⁷ United Nations Human Rights Council, (2025). *Visit to Australia - Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata**
<https://docs.un.org/en/A/HRC/60/28/Add.1>