

Invitation for Input: Anti-Slavery Commissioner's Strategic Plan 2025-2028

7 March 2025

Response Template: Strategic Plan Consultation Phase I

The Commissioner welcomes stakeholders to provide their input on the Strategic Plan. To help coordinate the range of perspectives, the Commissioner's Office has developed this template to invite stakeholders to respond to a series of questions.

Where relevant, please indicate which functions of the Commissioner, as set out in Section 20C of the Act, that you are responding to. You do not have to respond to all questions if you do not wish to. Please submit responses to contact@antislaverycommissioner.gov.au with the subject line: **Response to Invitation for Input: Strategic Plan [Organisation/individual name]** by Friday 28 March 2025.

Summary of consultation questions:

1. Considering the functions defined in Section 20C of the Modern Slavery Act, what are the **key priorities** for the Commissioner in 2025-2028? This relates to the most important areas of work for the Commissioner to address.
2. Considering the functions defined in Section 20C of the Modern Slavery Act, what **principal objectives** should the Commissioner work to achieve in 2025-2028? This relates to the goal(s) the Commissioner will work towards within a priority area.
3. Considering the functions defined in Section 20C of the Modern Slavery Act, what **key actions** should the Commissioner take to achieve these objectives? This relates to the activities that will help realise the goals.
4. How should the Commissioner's progress towards achieving the principal objectives be measured?
5. Is there any other information you wish for the Commissioner to consider in the development of the Strategic Plan?
6. Do you wish to be contacted for consultation on the initial draft of the Strategic Plan as set out in phase II?

Respondent Details

Name: Tri Nguyen

Email: tringuyen@ssi.org.au

Position: Social Policy Lead

Organisation: SSI (Settlement Services International)

Sector: Settlement, employment, education, foster care, disability, health, wellbeing and social supports

Consultation questions:

The Table manually entered in the following page, collates SSI's response to Questions 1 – 4 that ask for Key Priority Areas, Principal Objective/s, Actions/Activities and Measures that should be included in the 2025-2028 Strategic Plan, considering to the Commissioner's functions defined in Section 20C of the Modern Slavery Act.

Q1. Key priority areas	Q2. Principal Objectives	Q3. Actions/Activities to achieve these Principal Objectives	Q4. How to measure achievement of Principal Objectives
<p>Modern Slavery Act Compliance and Supply Chain Risk Management</p> <p><i>Commissioner functions:</i></p> <p>a) – (c), (k), (l), (ma)</p>	<p>Principal Objective 1:</p> <p>Promote and encourage Australian entities' compliance with the mandatory requirements of the Modern Slavery Act.</p> <p>Principal Objective 2:</p> <p>Continuous monitoring of the effectiveness of the Modern Slavery Act and providing suggestions for reforms to improve achievement of the Act's purposes; including as described in s7(2), giving effect to modern slavery international agreements that are in force for Australia.</p>	<p>Actions:</p> <ul style="list-style-type: none"> • Provide guidance and resources to businesses on modern slavery reporting requirements; including advocating that governments fund training for entities. • Support entities in conducting thorough risk assessments and implementing mitigation strategies; such as by advocating that governments fund such activities. • Continuously assess the effectiveness of the Modern Slavery Act and provide advice to the Minister on recommended reforms and advocate for these across industry, business, community sector and government agencies. 	<p>Measures:</p> <ul style="list-style-type: none"> • % rate of entities' annual compliance with mandatory requirements. • Annual reports detail the Commissioner's assessment of the operation of the Modern Slavery Act; identifies suggested reforms and advocacy taken to advance those changes.
<p>Victim Support and Engagement</p>	<p>Principal Objective:</p>	<p>Actions:</p>	<p>Measures:</p>

Q1. Key priority areas	Q2. Principal Objectives	Q3. Actions/Activities to achieve these Principal Objectives	Q4. How to measure achievement of Principal Objectives
<p>Commissioner functions: (c) – (f), (j), (ma)</p>	<ul style="list-style-type: none"> Enhance support for victims of modern slavery and impacted communities by providing information in relation to government and non government resources, programs and services and engaging them in policy development. 	<ul style="list-style-type: none"> Develop and disseminate guidance materials on available government and non government resources, programs and services. Dissemination efforts to include: <ul style="list-style-type: none"> A champion in community approach,¹ prioritised to those community groups and regions that are at higher risk of experiencing modern slavery. Engagement with sectors, organisations and services that are natural ‘soft-entry’ touchpoints to educate and raise awareness of modern slavery, such as: migration agents, Fair Work agencies, Working Women Centres, Migrant Resources Centres and all settlement providers. The Commissioner should advocate for corresponding funding resourcing to enable 	<ul style="list-style-type: none"> Guidance materials are informed by victim-survivors’ and impacted communities’ perspectives and needs. Furthermore, such materials should be provided in-language. No. of guidance materials Survey feedback from audiences regarding guidance materials. Types of engagement with victims cover a range of ad hoc and ongoing contributions such as Expert Panels, Advisory Groups. Overview of Commissioner’s advocacy for victim-survivor centred approaches. Commissioner makes advocacy and representation efforts to government agencies to invest in resourcing for those organisations and services that are likely to be natural ‘soft-entry’ touchpoints for victim-survivors.

Q1. Key priority areas	Q2. Principal Objectives	Q3. Actions/Activities to achieve these Principal Objectives	Q4. How to measure achievement of Principal Objectives
		<p>these services' increased role to respond to modern slavery.</p> <ul style="list-style-type: none"> • Scope and explore feasibility of providing an in-language information hotline and website. • Facilitate engagement with victim-survivors and agencies who are well connected in community and receive inquiries to inform policy and practice improvements. • Advocate for victim-survivor centred approaches in government and non-government initiatives. 	
<p>Research and Information Dissemination</p> <p>Commissioner functions:</p> <p>(f) - (h), (ma)</p>	<p>Principal Objective 1:</p> <p>Strengthen the evidence base on modern slavery through research and data analysis.</p> <p>Principal Objective 2:</p>	<p>Actions:</p> <ul style="list-style-type: none"> • Conduct and support research projects on modern slavery trends and impacts. • Collect, analyse, and disseminate data to inform policy and practice. 	<p>Measures:</p> <p>A research strategy/plan is developed that enables and delivers research in the following domains:</p> <ul style="list-style-type: none"> • Modern slavery prevalence and risk factors and dynamics.

Q1. Key priority areas	Q2. Principal Objectives	Q3. Actions/Activities to achieve these Principal Objectives	Q4. How to measure achievement of Principal Objectives
	Disseminate information that informs, guides and encourages best practice.		<p>including the needs of those with lived experience.</p> <ul style="list-style-type: none"> • Policy and regulation. • Modern slavery identification and response best practice.
<p>Collaboration and Advocacy</p> <p>Commissioner functions: (c), (e), (h) – (l), (ma)</p>	<p>Principal Objective 1:</p> <p>Foster collaboration across sectors and advocate for policy improvements.</p> <p style="padding-left: 40px;">a. Fair Work agencies have strengthened protocols to screen for and respond to modern slavery</p> <p>Principal Objective 2:</p> <p>Collaboration and advocacy efforts to prioritise Commonwealth reform of the modern slavery</p>	<p>Actions:</p> <ul style="list-style-type: none"> • Facilitate dialogue among government agencies, businesses, civil society and victim-survivors to align efforts against modern slavery. • Advocate for continuous improvement in policies and practices related to modern slavery. • Provide advisory services to the Minister on modern slavery matters as requested. 	<p>Measures:</p> <p><u>Collaboration and advocacy measures</u></p> <ul style="list-style-type: none"> • The Commissioner convenes cross sector wide, agency wide, civil society wide and lived experience collaborations including, but not limited to: <ul style="list-style-type: none"> - Visa settings' impact on enabling modern slavery. - Reviewing the effectiveness of measures and policies. such as the Workplace Justice Visa.

Q1. Key priority areas	Q2. Principal Objectives	Q3. Actions/Activities to achieve these Principal Objectives	Q4. How to measure achievement of Principal Objectives
	<p>enabling effects of restrictive visa settings, especially of temporary visas; and to provide alternative pathways out of modern slavery that meet victim-survivors' needs including pathways to permanency.</p>		<ul style="list-style-type: none"> - Identifying alternative pathways to permanency including services and resources required that meet the needs of victim-survivors to transition out of modern slavery safely. • Commissioner advocates and procures government agencies', Ministers' and Parliamentary support. <p><u>Reform measures</u></p> <p>Policy and appropriate legislative reform that:</p> <ul style="list-style-type: none"> • Has the support of stakeholders, especially victim-survivors and people with lived experience. • Remove the modern slavery-enabling features of Australia's restrictive visa settings. • Provide alternative pathways to permanent residency for victim-survivors to be able to safely exit

Q1. Key priority areas	Q2. Principal Objectives	Q3. Actions/Activities to achieve these Principal Objectives	Q4. How to measure achievement of Principal Objectives
			<p>the modern slavery without incurring undue hardship and punishment. These pathways reflect the needs that victim survivors identify as critical to providing safety and support and are appropriately and sustainably resourced.</p> <p><u>Effectiveness measures</u></p> <ul style="list-style-type: none"> • Number of disclosures/reporting of modern slavery. • Lower/zero number of deportations of victim/survivors due to their disclosure of modern slavery. • Feedback from victim/survivors of the level of support they received and experience transitioning out of their modern slavery situation.

5. Is there any other information you wish for the Commissioner to consider in the development of the Strategic Plan?

SSI's input is based on its experience in delivering the Strategies to Prevent Modern Slavery (SToP) program and responding to domestic and family violence in multicultural communities.

SSI's recommendations to the Commissioner to consider including in its Strategic Plan, detailed in its response to Questions 1 – 4 in the Table above, are based on our long-standing involvement in working with marginalised migrants and refugees and our delivery of the [Strategies to Prevent Modern Slavery \(SToP\) project](#) which is funded by the federal Attorney General's Department. Combating modern slavery through grants that fund civil society operated programs and projects is one strategy identified by the [National Action Plan to Combat Modern Slavery Program 2020-25](#).

SSI delivers SToP in NSW (Sydney, Coffs Harbour and Newcastle) and Queensland (Logan and surrounds). SToP aims to raise community awareness and education about three forms of modern slavery abuses: forced marriage, domestic servitude and forced labour, through in-language sessions targeted to community groups known to be vulnerable to modern slavery. From October 2023, SToP conducted community consultations and individual interviews that formed the basis of the creation of community-based videos, culture-specific toolkits, vignettes and guides for facilitators to use in subsequent workshop sessions. SToP has trained bilingual staff to facilitate these sessions, educating communities and raising awareness about modern slavery, including existing resources. For example, in the case of forced labour, the Work Rights Hub and Fair Work Ombudsman; and MyBlueSky, an initiative of Anti-Slavery Australia when discussing forced marriage; and promoting support and referral pathways. Furthermore, SSI is currently exploring opportunities with universities to run sessions on forced labour and labour exploitation targeting international students.

SToP has raised awareness and engaged over 500 participants spanning language groups that SSI's review of the evidence suggests have elevated risks of modern slavery (which can vary by the particular community and context). SToP sessions have been delivered to communities in Arabic, Bahasa, Bengali, Burmese, Dari, Farsi, Hindi, Vietnamese, Mandarin, Nepalese and English. The main focus of the Modern Slavery Act 2018 is on forced labour and SSI has implemented a number of initiatives in this area with temporary migrants experiencing modern-slavery conditions and has formed partnerships with local multicultural community-based organisations. Through these partner organisations, SSI identified that these services are likely to be the first responders for people experiencing labour exploitation; meaning that working through them is critical in reaching the broader community.

In addition, SSI's [NSW Multicultural Centre for Women's and Family Safety](#), promotes culturally appropriate, evidence-based and community informed responses to domestic, family and sexual violence in NSW, has encountered instances of modern slavery in the forms of forced marriage and domestic servitude. This has also been the case in SSI's delivery of the Australian Government's Status Resolution Support Services Program with people seeking asylum. SSI acknowledges the Australian Government's work to address

forced marriage and domestic servitude, particularly through Forced Marriage Specialist Support Program.

SSI's experience underscores the importance of ensuring that the Strategic Plan recognises, includes and addresses modern slavery dimensions that operate along intersectional lines, in particular, migration status, gender and culturally and linguistically diverse backgrounds.

6. Do you wish to be contacted for consultation on the initial draft of the Strategic Plan as set out in phase II?

Yes

REFERENCES

¹ Saberi, E., Hurley, J., & Hutchinson, M. (2021). The role of champions in leading domestic violence and abuse practice improvement in health care: A scoping review. *Journal of Nursing Management*. 130 (2). DOI:10.1111/jonm.13514. Retrieved from <https://www.researchgate.net/publication/356409622> The role of champions in leading domestic violence and abuse practice improvement in health care A scoping review