BCA
Business Council of Australia

Strengthening Australia's legislative response to modern slavery in supply chains

BCA submission

September 2026

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This report addresses key issues highlighted by the BCA, including:



1. Executive summary

The Business Council of Australia (BCA) welcomes the opportunity to provide this submission to the Attorney-General's Department in response to the 'Strengthening Australia's legislative response to modern slavery in supply chains' consultation paper.

The BCA represents 130 of Australia's major corporations and organisations, many with engagement across diverse domestic and global supply chains. The introduction of the Modern Slavery Act 2018 has been a positive step in improving transparency and mitigating the risk of modern slavery occurring through these supply chains.

The BCA and its members take a strong stand against modern slavery and support efforts to reduce its prevalence. For this reason, we are concerned that the reforms now being proposed do not align with the current transparency focused regime, the review of the Act and subsequent recommendations or consultations.

The 'Failure to Prevent' offence will not deliver improved outcomes for workers and rightsholders, as compared with strengthening the existing transparency framework, including through mandatory due diligence. The primary objective of the Modern Slavey Act reform is the safety, dignity and rights of workers, both domestically and across global supply chains.

Australia's approach to addressing modern slavery has focused primarily on transparency. That is, to highlight and uncover where modern slavery exists, and act to address and remediate. The focus on constructive engagement, and working with communities, has enabled businesses to be more confident to raise issues and make positive changes to address the communities impacted. Progress has been made in addressing modern slavery through a transparent model, and we would do not want to see a new system which results in a reversal of this work.

However, the proposed introduction of criminal penalties risks undermining that approach by creating incentives that work against its policy intent. It may encourage entities to minimise their exposure by looking less closely for modern slavery, disclosing less when risks are identified, or disengaging from high-risk suppliers and communities rather than working constructively with them to remediate harm. Penalising an entity in connection with conduct it has identified and disclosed may make candid investigation and reporting a source of legal risk. The proposed 'Failure to Prevent' regime could discourage the very transparency, engagement and remediation that the reforms are intended to promote.

The proposed comparison and application of the foreign bribery model of a 'Failure to Prevent' as referenced in the consultation paper, is inappropriate. Foreign bribery is a discrete, traceable act by an identifiable person within a corporation's own operations, whereas modern slavery is a systemic, hidden condition deliberately concealed across many tiers of a supply chain where a corporation may have no relationship, no visibility and no practical means of detection.

Overall, the proposed changes will increase reporting, legal requirements and costs for large and small businesses. It is counter to the government's productivity agenda of reducing the regulatory burden across the economy.

The structures and processes which companies have implemented will have to be reconsidered from a legal risk perspective, rather than through a transparency and remediation approach focused on working with communities to improve conditions and long-term economic benefits for workers. Yet the consultation paper cites no empirical evidence that the proposed offence would reduce either the incidence of modern slavery or the likelihood of goods and services linked to it entering Australian supply chains. Nor does it address the unregulated importation of goods by offshore operators which are not subject to these requirements.

The proposed changes also do not align with current international reforms and those soon to be introduced in other countries, putting Australia out of step with similar jurisdictions. A legal compliance model is counter to the risk- and principles-based approach under the United Nations Guiding Principles. In addition, they do not meet

the requirements of the United States' Forced Labour Ban or the European Union's Forced Labour Regulation which commences in December 2027.

We also bring to the Department's attention the current Treasury consultation on the exposure draft legislation concerning non-compete clauses and other restraints. The draft bill could have the unintended consequence of discouraging businesses from including contractual provisions designed to minimise or eliminate labour exploitation, including modern slavery, because those provisions may expose businesses to potential cartel liability, even where they impose legitimate labour standards. This could put businesses in an impossible position, where they may face criminal liability if they fail to take reasonable steps to prevent modern slavery, but risk criminal cartel liability if they include those protections in their contracts.

As Australia seeks to drive more investment and business engagement, particularly in our region, the risk of criminal penalties will also have a chilling effect on companies looking to enter some markets where they are uncertain as to how they would meet the proposed legal requirements. Again, one government policy running counter to another.

For these reasons, we urge the government not to proceed with the introduction of criminal penalties for a failure to prevent modern slavery. As per our joint letter to the Attorney General with other employer groups, we recommend the government proceed with a mandatory due diligence obligation as a preferred model.

2. Key recommendations

Recommendation 1.

- Do not proceed with the proposed criminal offence
- As per the joint letter to the Attorney General from employer groups, we recommend the government proceed in implementing a mandatory due diligence obligation instead
- If the government does proceed with a criminal offence:
  - Consider an alternate model of 'failure to identify, mitigate and remediate'
  - Do not replicate the Anti-Foreign Bribery model in the modern slavery context
  - There should be a clear link to the actions of the corporation, such that it is clear that they were deliberate and directly caused the modern slavery in the supply chain
  - Clearly define a causal or contributory connection between the corporation's own conduct and the underlying offending, with a specified formulation
  - Align the key principles as much as possible with the UNGPs and OECD principles
  - Include the definition of 'reasonable steps' in the legislation
  - Provide guidance on how corporations are to undertake 'reasonable steps' in locations where it is difficult, or they are unable to seek information, such as where it is illegal to make inquiries into modern slavery
  - Recognise that corporations are unable to address all issues in supply chains, and a proportionate and risk-based approach is required
  - Do not impose an absolute or strict liability, consider recklessness with significant caveats, that it only applies where the company was aware of the modern slavery, it fails to take reasonable steps and there is a direct connection with the corporation
  - Criminal penalties only apply where there is a direct nexus between the company's actions, and it knowingly facilitated modern slavery
- Penalties should be proportionate. If liability is strict or absolute, and proof of fault is therefore not required, then maximum penalties should be limited. Any penalty should reflect the seriousness of the corporation's conduct, actual culpability and any benefit obtained.
- Allow a two-year timeframe for implementation following the date of the passage of the legislation and issuing of guidance
- The Australian Government as a major procurer, should also be in scope

Recommendation 2.

- Include details on 'reasonable steps' in the legislation for clarity
- Provide additional guiding materials and education for businesses, including SMEs
- Align where possible with other international principles to minimise Australia being an outlier in its reporting requirements and requests to its supply chains, and additional costs from creating duplicative reports
- Provide for mutual recognition of compliance with equivalent international frameworks
- Facilitate industry sector collaboration on initiatives to address modern slavery

Recommendation 3.

- Develop a graduated enforcement process, enabling the prioritisation of the most egregious cases for criminal prosecution
- Consult further on the practicalities and details of any proposed DPA scheme
- Any DPA scheme must be voluntary
- Judicial approval should be required for the terms of a DPA
- Clarify how the criminal and civil systems will operate to minimise complexity and costs and avoid a greater emphasis on legal matters at the expense of remediating modern slavery and improving outcomes for those affected
- Develop a safe harbour model to encourage transparency, including for multi-entities or an industry sector

3. Part A – Core legislative components of a failure to prevent offence

Question 1 – Model: What are your views on the proposed legislative approach to the core components of a failure to prevent modern slavery offence?

Are there any other components that should be included within the legislation, or alternative approaches considered, to clearly establish its scope, application and interaction with existing modern slavery and broader legislative frameworks?

The core components include:

a) Application of the offence
b) The underlying criminal conduct to be prevented
c) The connection to corporations' sourced product or services
d) The connection to corporations' conduct
e) Fault elements
f) Defence
g) Guidance
h) Penalty
i) Commencement.

Introduction

Any legislative reform to the Modern Slavery Act must be judged by what it does to protect vulnerable workers and improve their lives on the ground. Effective reform must encourage proactive due diligence, prioritise worker remediation and foster co-operative relationships across the supply chain, including with workers, to identify, mitigate and remediate risks. The 'Failure to Prevent' corporate criminal offence will have the unintended consequences of disincentivising businesses from undertaking the due diligence and transparency reporting of modern slavery issues and risks.

The introduction of criminal penalties for a 'Failure to Prevent' offence for modern slavery was not one of the recommendations from the Review into the Modern Slavery Act 2018. Nor was it a recommendation from Australia's independent Anti-Slavery Commissioner in response to the consultation arising from the Review.

The BCA was very engaged in the Review process, made submissions and consulted with its members. At the time, the BCA took the position that with significant regulatory burdens already imposed on Australian businesses, and Australian productivity growth at its weakest in 60 years, the threshold should be set high for adding any additional regulatory burden. We raised concerns that the two proposals, mandatory due diligence and high-risk declarations:

> "...may impose additional compliance obligations without a commensurate improvement in risk management outcomes. On that basis, currently we do not support further regulatory or legislative interventions. However, should reform be pursued, it must be carefully calibrated to ensure it strengthens outcomes without imposing additional layers of prescriptive regulation or diverting resources away from practical risk mitigation."

The Business Council maintains this position. Unfortunately, what is now being proposed will add further costs, without the required improvement in risk management outcomes. Even more concerning, a punitive rather than transparency-focused approach is more likely to undermine the original purpose of the Modern Slavery Act to protect the rights, safety and dignity of workers in Australia and in global supply chains.

The shift to a 'Failure to Prevent' corporate criminal offence will deter businesses from transparently seeking to uncover cases, as companies seek to distance themselves from their suppliers. As an example, businesses may

be reluctant to establish worker grievance mechanisms, which are considered an important due diligence tool. Improving worker grievance mechanisms which, in turn, improve worker engagement increases the chance that one will uncover modern slavery, which also increases liability exposure under the proposed offence. Instead, the proposed offence will encourage a narrower legal compliance approach, which will put an increased burden on businesses to comply with regulatory 'box ticking', rather than prioritising higher-risk cases and seeking to address and remediate. The regulatory burden will be greater, but the outcome will be diminished.

On that basis, the BCA opposes the introduction of a criminal offence and proposes that the government consider the previous recommendation of mandatory due diligence.

Key points

Application of the offence

The current reporting requirements cover corporations with annual consolidated revenue of over $100 million. We do not propose a change to this threshold.

However, we do highlight that the implications of any change are not just on those companies, but also on the smaller businesses in their supply chains. The addition of criminal penalties will increase the requirement from reporting corporations to interrogate their supply chains which can involve hundreds or thousands of SMEs. Previous consultations on the review of the Act recognised the burden this was placing on those businesses and there was a concerted effort to consider solutions to streamline and minimise those requirements. That well intentioned approach will unfortunately be difficult to implement under this regime.

The proposed offence does not address concerns about a level playing field, and that all companies doing business in Australia are subject to the same regulatory requirements. For example, what exposure would Temu or Shein have under the proposed offence?

If the current threshold applies, the Australian Government, as a major entity and procurer, should also be included under the Modern Slavery Act.

Underlying criminal conduct

We support the current definitions of the types of modern slavery to be covered by the offence under Divisions 270 and 271 of the Criminal Code. Any expansion of these will be even more difficult to administer.

Connection to a corporation's sourced product or service

The consultation paper compares the proposed offence to the 'Failure to Prevent' offence for foreign bribery, but this is of limited value as a model for modern slavery. This is because the foreign bribery offence centres on a far more confined and readily identifiable connection between the wrongdoing and the corporation. It applies where a legally defined associate of the corporation bribes a foreign public official for the corporation's profit or gain. By contrast, as the consultation paper recognises, the proposed modern slavery offence could reach conduct that is many tiers removed from the corporation where it has little to no control to prevent the offence from occurring (although the specific connection that will be required between the corporation and the exploitation has not yet been settled). For example, there may be no contractual relationship with the entity in its supply chain that is actually exploiting vulnerable workers. The foreign bribery model does not translate readily to broad, diverse supply chains that can extend across many products, suppliers and intermediaries.

Tier one providers are generally the corporation's most direct and obvious connection in a supply chain. But even then, a corporation may not have access to full information or sufficient influence over the supplier's conduct. So, whilst limiting the connection to tier one as a way of defining the connection to the corporation, it is far too simplistic and impractical an approach, and would undermine the broader actions currently undertaken by companies to address modern slavery further down their supply chains. This makes the definition of supply chain extremely problematic, particularly when considering a practicable threshold for enforcement.

A corporation's visibility and influence generally diminish further down a supply chain. It cannot delve into every organisation, nor does it have the power to. This problem is particularly acute when dealing with State-Imposed

Forced Labour (SIFL), where a company will have limited ability, if any, to influence the supply chain. In practical terms, defining a supply chain and the connection to the corporation's sourced product or service is very difficult and impractical to enforce. In some jurisdictions with a risk of SIFL, there are also significant restrictions on information gathering.

Although the consultation paper acknowledges this complexity and the distinctions between the foreign bribery and modern slavery contexts, it does not clearly explain how the proposed legal framework would overcome the practical difficulties of identifying and proving the relevant connections, or the significant challenges of limited corporate visibility and influence. Nor does it show how the proposed offence and reasonable steps defence would give businesses sufficiently clear and workable rules capable of operating effectively in complex global supply chains. Nor is there any articulation about why a framework targeted at imposing liability in respect of conduct of an associate (as defined) is suitable in this context, where legislation is concerned with imposing liability for the conduct of an independent third party, generally a foreign entity.

It is important to note that other regimes have not gone down the criminal penalties path. This model does not align with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD guidelines. While the proposed model may appear to be a tougher approach, it fails to meet the requirements of the United States' Forced Labour Ban or the upcoming EU Forced Labour Regulation (FLR). The irony is that Australian companies will be facing even tougher criminal penalties under the proposed Australian reform but are still likely to be hit with ongoing higher tariffs from the US, following its review of Australia's forced labour laws.

Nexus between offence and the corporation

Further clarification is needed as to what would be captured through a definition where a company '*caused or significantly contributed to the underlying offending*'. As an example, purchasing a product does not automatically mean the company's pricing policies are a major contributor to modern slavery. This type of definition is simplistic and goes against the well-known understanding of how modern slavery operates.

The alternative formulation proposed, of '*materially contributed to, facilitated or enabled the underlying offending*', provides additional guardrails, although it is still extremely broad and risks significant challenges in definition and prosecution. This also does not align with the circumstances in which criminal liability is imposed on one party, for the conduct of another. As an example, it does not align with 'aiding and abetting' or 'knowingly concerned' provisions that impose accessorial liability.

When dealing with criminal prosecutions, there should be a clear link to the actions of the corporation, such that it is clear that they were deliberate and directly caused the modern slavery in the supply chain.

The range of options proposed in the consultation paper confirms the challenge of trying to define a very complex area. It will be extremely difficult for a corporation to understand what its legal responsibilities will be, particularly when assessing a corporation's act or omission in relation to the conduct, given that it may often have no awareness of the relevant actions or be able to fully trace goods and services through diverse supply chains.

Fault elements

Comparisons with the foreign bribery model are again inappropriate. As a key principle, the corporation must have knowledge of the offence. That is why absolute or strict liability should not apply.

A recklessness-based offence also creates difficulties in a modern slavery context, where the offence is very often beyond the corporation's ability to have that knowledge.

Defences - Reasonable steps

The proposed defence of reasonable steps will be critical if the reforms proceed, to enable corporations to understand what they will be required to do. As much as possible, the definition should align with the UNGPs and the OECD guidance. These include elements such as materiality, proportionality, control, leverage and proximity. The offence construction does not align with the UNGPs, which are designed to be remediation and solution

focussed, rather than means to determine fault. Instead, the UNGPs expect corporations to undertake due diligence to identify whether they may be involved in human rights harm and provide for cooperation in remedial action where appropriate. Bringing these expectations into the offence construction assists with alignment, reinforces existing good practice already in place within reporting entities in Australia and reduces duplication across jurisdictions.

Reasonable steps should also be defined in the legislation and not left solely to be detailed in later guidance. This should also include prioritising due diligence for high-risk areas, which will allow businesses to continue to take a risk-based approach where appropriate.

It will be important to consider how corporations are expected to take reasonable steps in jurisdictions where it is extremely difficult or illegal to even ask for information regarding modern slavery. The recent Chinese decrees 834 and 835 are examples of this. How does the government propose to address or account for circumstances where an entity is limited in the due diligence it can undertake by local laws or the geopolitical circumstances? The government cannot intend that entities no longer do business with companies in those jurisdictions and so what constitutes 'reasonable steps' in such a jurisdiction must be addressed.

The same issues arise regarding practical inquiries and evidence gathering to undertake a prosecution. How will evidence be obtained where the corporation is unable to request or access the information? Are the Australian Federal Police (AFP) going to undertake this work? Has a budget been allocated for the necessary expansion of the AFP's overseas operations that the administration of this proposed scheme will require? If the AFP is not the responsible agency, who will do the evidence gathering, and if it is reliant on other parties, a civil rather than criminal jurisdiction would appear more appropriate.

There is also concern that a civil remedies process in parallel with a criminal prosecution will create additional complexity, increased legal costs, and a further tendency away from transparency to managing the risk of additional legal cases.

Penalty

If, against our recommendation, the Government proceeds with legislating a criminal offence, the proposed penalties for the offence should be proportionate. If the offence is based on strict or absolute liability, the maximum penalty should be limited because a corporation could be convicted without proof that it intended the wrongdoing, knew about it or was reckless as to the risk of it occurring.

Any penalty imposed should reflect the seriousness of the corporation's conduct, any actual degree of fault, and the value of any benefit obtained.

Additionally, there are existing regulatory levers that could and should be pulled before criminal prosecution is contemplated. For example, there is an existing ability to 'name and shame' non-compliant entities under the current Modern Slavery Act. The Fair Work Ombudsman can investigate and prosecute employers in Australia who do not pay workers appropriately, and misleading or deceptive conduct laws mean any company that acts inconsistently with statements about how it does business can be the subject of enforcement action by the Australian Competition and Consumer Commission (ACCC).

A graduated enforcement process should be adopted, to enable prosecution resources to focus on the most egregious cases.

Delayed commencement

As there will be significant changes required to company processes and supply chain review practices, a commencement date two years after the passage of the legislation and issuing of guidance would be recommended. This will give businesses time to update their systems, and importantly, inform and educate their supply chains on the additional information required to comply with the reforms.

Recommendation 1.

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- If the government does proceed with a criminal offence:
  - Consider an alternate model of 'failure to identify, mitigate and remediate'
  - Do not replicate the Anti-Foreign Bribery model in the modern slavery context
  - There should be a clear link to the actions of the corporation, such that it is clear that they were deliberate and directly caused the modern slavery in the supply chain
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  - Align the key principles as much as possible with the UNGPs and OECD principles
  - Include the definition of 'reasonable steps' in the legislation
  - Provide guidance on how corporations are to undertake 'reasonable steps' in locations where it is difficult, or they are unable to seek information, such as where it is illegal to make inquiries into modern slavery
  - Recognise that corporations are unable to address all issues in supply chains, and a proportionate and risk-based approach is required
  - Do not impose an absolute or strict liability, consider recklessness with significant caveats, that it only applies where the company was aware of the modern slavery, it fails to take reasonable steps and there is a direct connection with the corporation
  - Criminal penalties only apply where there is a direct nexus between the company's actions, and it knowingly facilitated modern slavery
- Penalties should be proportionate. If liability is strict or absolute, and proof of fault is therefore not required, then maximum penalties should be limited. Any penalty should reflect the seriousness of the corporation's conduct, actual culpability and any benefit obtained.
- Allow a two-year timeframe for implementation following the date of the passage of the legislation and issuing of guidance
- The Australian Government as a major procurer, should also be in scope

Question 2 – Impact: What measures could be adopted to minimise costs for affected corporations, while ensuring the offence remains effective in achieving its objectives?

Question 3 – Support: What support might corporations need to effectively understand and comply with the proposed offence and defence, including to help businesses more broadly to take action to combat modern slavery?

Key Points:

Clarity and guidance

The likely significantly increased costs of the administration of the scheme are counter to the government's stated priorities of improving Australia's productivity and reducing the regulatory burden on business.

Costs will significantly increase, as all current systems will need to be reviewed to comply with the changed legal requirements. This cost will be borne by large and small businesses. Reporting entities will incur significant costs in their legal and compliance areas. For SMEs there will be additional requirements to meet the requests from organisations to provide and verify the absence of modern slavery.

Including the definition and details of 'reasonable steps' in the legislation will assist in providing clarity. Additional guidance and supporting information will also be required. Illustrative examples and education materials, including for SMEs in supply chains, will be important in helping businesses understand their new requirements. To improve implementation, a specific stream of work is needed with SMEs, so that companies requesting information are more likely to receive it, and it is in a form which meets the new standards.

However, we continue to stress that such assistance will only marginally address the substantial additional legal and regulatory costs that a change of this type will impose.

International frameworks

Many Australian corporations operate under comparable legislation in other jurisdictions, including the Canadian and UK Modern Slavery Acts, and will soon operate under the due diligence obligations of the EU CSDDD. Many organisations already comply with the UNGPs and OECD guidelines. Aligning the legislation as much as possible with those systems to minimise the need for companies to provide a bespoke reporting system for Australia should be a priority.

The legislation should provide for mutual recognition of compliance with equivalent international frameworks, avoiding the need for corporations to maintain separate, jurisdiction specific compliance programs that address identical risks.

Sector level collaboration

Collaboration within and across industry sectors should be encouraged and facilitated. Initiatives such as industry codes of conduct, shared audit programs and collaborative traceability platforms can deliver greater outcomes than individual companies acting alone. However, this will require consideration of both competition law implications and the risks of a criminal prosecution under the proposed changes.

Recommendation 2.

- Include details on 'reasonable steps' in the legislation for clarity
- Provide additional guiding materials and education for businesses, including SMEs
- Align where possible with other international principles to minimise Australia being an outlier in its reporting requirements and requests to its supply chains, and additional costs from creating duplicative reports

- Provide for mutual recognition of compliance with equivalent international frameworks
- Facilitate industry sector collaboration on initiatives to address modern slavery

4. Part B – Alternative enforcement

Question 4 – DPA Scheme: What are the benefits and limitations of a DPA scheme in addressing failure to prevent modern slavery offences? What terms and conditions should be available for inclusion in a DPA scheme?

Question 5 – Civil remedies: What existing civil remedies would be available to victims and survivors seeking redress in connection with a failure to prevent modern slavery offence?

Are these remedies adequate? If not, what enhancements could be considered?

Key points:

Graduated enforcement

We propose there be a graduated enforcement process, such as compliance notices and then enforceable undertakings, before criminal charges are considered, with the last of these used only for the most egregious cases. This would provide a mechanism for the authorities to concentrate on priority offences, particularly when resources will be limited and the ability to obtain evidence will be exceptionally difficult.

Deferred Prosecution Agreement

A DPA scheme would be new for Australian companies and, as such, there may be significant concerns as to how it would operate.

A key principle would be that a DPA must be voluntary. A company must have the choice as to whether it agrees to the DPA or allows a criminal case to potentially proceed. The terms of the agreement should require judicial approval and a mechanism for the court to reject agreements that are not in the interests of justice. The decision to offer a DPA should rest with the Commonwealth Director of Public Prosecutions.

As already highlighted, the operation of the criminal process is highly uncertain because much of the evidence in many cases will be overseas and will require cooperation with other suppliers or governments. In such circumstances, the legal and evidentiary basis on which a DPA would be considered will be difficult to determine. Businesses would need to assess the risk in those circumstances of agreeing to a DPA, when the basis for a criminal case is unclear but, in the public domain, agreement to a DPA may nevertheless be perceived as an admission of guilt and cause significant reputational damage.

Companies would also need to consider the implications of a DPA, when any evidence or admissions made could then be used in a separate civil case.

Overall, the proposed reforms are likely to lead to increased litigation, causing reputational harm to businesses, even where the case does not succeed, and in many instances the Australian Federal Police will not have the resources or authority to pursue actions, particularly in other jurisdictions.

The options of civil remedies become complex when criminal penalties are now being considered. This creates two different legal processes. We note that other jurisdictions have civil remedies, such as the EU's CSDDD which comes into effect in 2029. Compliance is through civil liability and administrative penalties.

Safe Harbour

If the Government proceeds with implementing a criminal offence, the concept of a safe harbour may provide an alternative or complementary model to a DPA. A safe harbour mechanism could enable an organisation to disclose supply chain modern slavery risks and intended remedial actions at an early stage, and thereby secure an immunity from prosecution risk, which is more akin to the current transparency and disclosure regimes. Consideration should also be given to the safe harbour being used by multiple entities or an industry sector, to enable the sharing of information, which can be critical in addressing areas of risk. This would allow organisations to act in good faith in providing information, and demonstrate their willingness to respond,.

Matters raised in Modern Slavery Statements should receive statutory immunity from prosecution arising from those disclosures. Without this, the offence creates the perverse incentive to conceal rather than disclose risks.

Recommendation 3.

- Develop a graduated enforcement process, enabling the prioritisation of the most egregious cases for criminal prosecution
- Consult further on the practicalities and details of any proposed DPA scheme
- Any DPA scheme must be voluntary
- Judicial approval should be required for the terms of a DPA
- Clarify how the criminal and civil systems will operate to minimise complexity and costs and avoid a greater emphasis on legal matters at the expense of remediating modern slavery and improving outcomes for those affected
- Develop a safe harbour model to encourage transparency, including for multi-entities or an industry sector

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