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Strengthening Australia's criminal justice response to modern slavery: A rapid assessment

Prepared by the Australian Institute of Criminology for the Office of the Australian Anti-Slavery Commissioner

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Disclaimer

This report does not necessarily reflect the policy position of the Australian Government nor the views of the Australian Anti-Slavery Commissioner's Office.

Acronyms and abbreviations

AFP	Australian Federal Police
AIC	Australian Institute of Criminology
HTVF	Human Trafficking Visa Framework
JSCFADT	Joint Standing Committee on Foreign Affairs, Defence and Trade
National Action Plan	*National Action Plan to Combat Modern Slavery 2020–25*
OHCHR	Office of the United Nations High Commissioner for Human Rights
PJCLE	Parliamentary Joint Committee on Law Enforcement
STPP	Support for Trafficked People Program
Targeted review	*Targeted review of modern slavery offences in Divisions 270 and 271 of the* Criminal Code Act 1995
UN	United Nations
UNODC	United Nations Office on Drugs and Crime

A note on terminology

Modern slavery is used in this report to describe human trafficking, slavery and slavery-like offences in Divisions 270 and 271 of the *Criminal Code Act 1995* (Cth). The authors recognise that there are concerns about the legal and social implications of this term.

This report uses the terms 'victim', 'victim and survivor' and 'people with lived experience' to describe people who have experienced human trafficking and modern slavery. The authors recognise that not all people with lived or living experience will identify with these terms.

Abstract

Modern slavery is a serious, pervasive and largely hidden human rights and safety issue, for which a strong criminal justice response is required to ensure the detection and prosecution of perpetrators, as well as justice for victims and survivors. This report was commissioned by the Office of the Australian Anti-Slavery Commissioner to understand opportunities to improve Australia's criminal justice response to modern slavery. Three data collection activities were undertaken as part of this research: a literature search, stakeholder consultations and consultations with people with lived experience of modern slavery or modern slavery policy.

The report identifies ongoing gaps in Australia's criminal justice response to modern slavery that are preventing some victims and survivors from accessing justice and remedy and holding offenders accountable for their crimes, and makes recommendations to address these gaps. The findings and recommendations aim to contribute to and complement the ongoing and important work being undertaken by the Australian Government to strengthen the criminal justice response to modern slavery.

Executive summary

Background, aims and approach

Australia's response to modern slavery reflects its obligations under a range of international instruments and has most recently been grounded in the *National Action Plan to Combat Modern Slavery 2020–25* (the National Action Plan; Australian Government 2020). The Australian Government aims to respond to modern slavery in a 'comprehensive, effective, timely [and] coordinated' manner that is consistent with international obligations and that promotes investigation, prosecution and penalty of offenders (Australian Government 2020: 20). A strong criminal justice response to modern slavery is important for detecting and prosecuting perpetrators, deterring future offending, and facilitating justice for victims and survivors (Gallagher & Karlebach 2011).

Past and current efforts to strengthen Australia's criminal justice framework for modern slavery have been informed by a steadily growing body of research, including a number of government reviews and inquiries. The current report was commissioned by the Office of the Australian Anti-Slavery Commissioner to collate and summarise the key findings of this work, including the priority law and policy reforms suggested by it, and to supplement these findings with primary data from targeted consultations with stakeholders and people with lived experience. It provides an empirical basis for the Commissioner's criminal justice agenda. It addresses the following questions:

- What are the trends and key issues in Australia's criminal justice response to modern slavery?
- What are the key gaps identified in the available data and literature?
- What are the primary or priority laws, policies or processes that require review or reform to improve the criminal justice response?

Three data collection activities were undertaken as part of this research: a literature review, stakeholder consultations (*n*=36) and consultations with people affected by modern slavery and modern slavery policy or practices (eg people whose workplaces have been impacted by compliance-focused policing operations; *n*=34).

Key findings and recommendations

This report has identified ongoing gaps in Australia's criminal justice response to modern slavery that are preventing some victims and survivors from accessing justice and remedy and holding offenders accountable for their crimes. While many of these findings and recommendations have been made previously, we note ongoing concerns that further and different action is required to strengthen the criminal justice response to modern slavery in Australia. Specifically, victims still face barriers to justice, including Australia's legal framework for modern slavery, policing and prosecution practices, and support and protection measures. A deeper understanding of these barriers is needed, along with systemic action to address these barriers and achieve more tangible outcomes for victims and survivors.

In making these findings and recommendations, the authors acknowledge the ongoing and important work being undertaken by the Australian Government to strengthen the criminal justice response to modern slavery. The following findings and recommendations aim to contribute to and complement these efforts and are informed by findings from previous reviews, inquiries, the broader literature, stakeholder feedback and, importantly, the perspectives of people with lived experience.

Finding 1: Despite improvement in criminal justice responses in recent years, there remain structural and operational barriers to identifying and prosecuting cases.

Recommendation 1: Police, prosecutors and other criminal justice practitioners should critically assess the effectiveness of current systems for identifying and investigating modern slavery to identify areas for improvement. Such improvements may relate to the uptake and efficacy of existing training programs, the accessibility of reporting mechanisms, and communication and collaboration within and between agencies and victim service providers.

Finding 2: While there are measures in place to support victims and survivors to access and navigate the criminal justice system (eg trauma-informed policing practices and legal support), there remains inconsistency in the extent to which these are being applied. The inconsistent application of victim-centred and trauma-informed processes impacts victims and survivors' ability to access justice and support, and to recover from the harms caused by their exploitation.

Recommendation 2: Victim-centred and trauma-informed practices should be consistently embedded throughout the investigation and prosecution of modern slavery to ensure that victims and survivors can participate in the process safely and to minimise the risk of retraumatisation. This includes ensuring there is sufficient communication between criminal justice practitioners and victims and survivors, minimising the burden on victims and survivors to contribute to an investigation and prosecution, and providing appropriate legal support for victims and survivors.

Finding 3: Despite ongoing improvements in measures to support victims and survivors' recovery and ongoing protection, victims and survivors are not consistently benefiting from these measures.

Recommendation 3: Efforts to improve criminal justice responses to modern slavery should focus on strengthening support, protection and remedy measures to enhance their accessibility and effectiveness. This includes legislating forced marriage protection orders for adults, legislating a specific defence for victims of modern slavery, introducing a Commonwealth compensation scheme for victims and survivors of modern slavery, and further de-linking support mechanisms from criminal justice participation.

Finding 4: There remain gaps in available research and data on the effectiveness of criminal justice responses to modern slavery (eg challenges and emerging effective practices in policing and prosecution) and on victims and survivors' experiences accessing and navigating the criminal justice system. Improving understanding of these issues would better direct and support changes in policy and practice.

Recommendation 4: Further research and systematic data collection should be funded to explore the effectiveness of criminal justice responses to modern slavery and victims and survivors' experiences accessing and navigating the criminal justice system. Future research and data collection should focus on priority populations including children, victims and survivors with a disability, and First Nations victims and survivors.

Introduction

Background and aims

Modern slavery is a serious, pervasive and largely hidden human rights and safety issue. Beyond the devastating human cost, it also has substantial economic costs. A recent report estimated that serious and organised crime involvement in modern slavery (excluding forced marriage) cost the Australian economy between $172.9m and $345.8m in 2023–24 (Voce & Morgan 2025). Australia's response to modern slavery reflects its obligations under a range of international instruments, particularly the *United Nations Convention against Transnational Organized Crime* and its supplementary *Protocol to Prevent, Suppress and Punish Trafficking in Persons*, the *International Convention to Suppress the Slave Trade and Slavery* and the *Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery*.

In recent times, Australia's response to modern slavery has been grounded in a series of national strategies, most recently the *National Action Plan to Combat Modern Slavery 2020–25* (Australian Government 2020). The National Action Plan applied to all forms of modern slavery and had five strategic priorities: prevention; disruption, investigation and prosecution; support and protection; partnership; and research. Australia has adopted a whole-of-government approach to preventing and responding to modern slavery, which is overseen by the Interdepartmental Committee on Human Trafficking and Slavery. The Australian Government also works closely with non-governmental organisations in its response to modern slavery, including through the Annual National Roundtable on Human Trafficking and Slavery.

The Australian Government aims to respond to modern slavery 'in a manner that is comprehensive, effective, timely, coordinated and consistent with our international obligations' and to promote investigation, prosecution and penalty of offenders (Australian Government 2020: 20). A strong criminal justice response to modern slavery has been recognised as critical to detecting and prosecuting perpetrators, deterring future offending, and facilitating justice for victims and survivors (Gallagher & Karlebach 2011).

Human trafficking, slavery and slavery-like practices are criminalised under Divisions 270 and 271 of the *Criminal Code Act 1995* (Cth). Modern slavery offences were first introduced to Australia's *Criminal Code Act 1995* (Cth) in 1999, before being reformed and expanded in 2004 following Australia's ratification of the *United Nations Convention against Transnational Organized Crime* and its supplementary *Protocol to Prevent, Suppress and Punish Trafficking in Persons*. Related conduct is criminalised under the *Migration Act 1958* (Cth), the *Fair Work Act 2009* (Cth) and state and territory legislation (particularly laws related to sexual servitude). Protections for victims and survivors of modern slavery when providing evidence in modern slavery proceedings are provided under the *Crimes Act 1914* (Cth). Finally, the *Modern Slavery Act 2018* (Cth) provides a framework for targeting modern slavery practices in supply chains and operations, and supports Australian businesses to minimise and address modern slavery risks.

Past and current efforts to strengthen this framework have been informed by a steadily growing body of research, including a number of government reviews and inquiries. The current report was commissioned by the Office of the Australian Anti-Slavery Commissioner to collate and summarise the key findings of this prior work, identify the priority law and policy recommendations that extend from them and further illuminate them with the perspectives of stakeholders and experiences of people affected by modern slavery and modern slavery policy (eg people whose workplaces have been impacted by compliance-focused policing operations). It provides an empirical basis for the Commissioner's approach to criminal justice issues and addresses the following questions:

- What are the trends and key issues identified in the available data and literature regarding Australia's criminal justice response to modern slavery?
- What are the key gaps identified in the available data and literature?
- What are the primary or priority laws, policies or processes that require review or reform to improve the criminal justice response?

Importantly, this paper does not seek to examine responses to modern slavery outside of the criminal justice system. The authors nonetheless recognise the importance of a holistic response to modern slavery, including but not limited to the criminal justice system, regulatory frameworks, support provision and prevention initiatives.

Approach

Three data collection activities were undertaken as part of this research: a literature search, stakeholder consultations and consultations with people with lived experience of human trafficking and modern slavery or modern slavery policy.

Literature search

A literature search was conducted in collaboration with the JV Barry Library (part of the Australian Institute of Criminology (AIC)) in April and May 2025. The JV Barry Library searched for relevant research and other resources using standard search terms:

- slavery OR traffick* OR "child exploitation" OR "sexual exploitation" OR "labour exploitation" OR "labor exploitation" OR servitude OR "forced labour" OR "forced labor" OR "debt bondage" OR "forced marriage" AND
- legislat* OR law* OR legal OR report* OR "criminal justice" OR justice OR polic* OR "law enforcement" OR ABF OR "Australian Border Force" OR prosecut* OR judge* OR court* OR judicia* OR sentence* OR "post-sentenc*" OR "Criminal Code" OR "Modern Slavery Act" OR "Crimes Act" OR "Migration Regulations" OR "Fair Work Act" OR "Proceeds of Crime Act".

The AIC's JV Barry Library searched six databases: ProQuest, EBSCO, Analysis and Policy Observatory (now called Australian Policy Online), Google Scholar, DeepDyve, and the JV Barry Library Catalogue.

The search was limited to English-language sources with a substantive focus on Australia that were published between 2013 and early 2025. This timeframe ensured that the search captured research and other sources published after the most recent major amendments to the legal framework for modern slavery in Australia. Sources were excluded if they focused on conduct outside the scope of Divisions 270 and 271 of the *Criminal Code Act 1995* (Cth), such as studies focused only on the *Modern Slavery Act 2018* (Cth) or related issues (ie prevention and intervention in the context of businesses), breaches of workplace laws that do not meet the threshold of modern slavery (eg wage underpayments), and child sex offences outside Australia and offences involving child abuse material outside Australia. Sources were also excluded if they did not have a substantive focus on one or more elements of the criminal justice system—for example, sources that focused on regulatory responses to modern slavery or the support needs of victims and survivors that were not related to participation in the criminal justice system. Individual submissions to completed government reviews and inquiries were also excluded from analysis.

Supplementary searches were undertaken of websites of key government departments and international forums, as well as relevant journals (eg *Anti-Trafficking Review*) and the reference lists of specific sources. Additional research and other sources provided by stakeholders who participated in this research (see *Stakeholder consultations* below) were also included. These sources included international literature and literature published prior to 2013 that were directly relevant to the current rapid assessment. Due to time constraints, a more thorough review process (eg a systematic review) was not possible. As such, the included literature is not exhaustive.

Stakeholder consultations

Individual and group interviews were conducted with 36 stakeholders involved in Australia's criminal justice response to modern slavery. This included 13 government stakeholders and 23 non-government stakeholders. These interviews focused on understanding participants' perspectives on modern slavery legislation; the identification, investigation and prosecution of modern slavery matters; court and sentencing processes; and support for victims and survivors of modern slavery.

In addition, this project draws on transcripts from individual and group interviews conducted with an additional 11 government stakeholders as part of the AIC's evaluation of the National Action Plan (ongoing at the time of writing). These interviews focused on participants' perspectives on the implementation of and outcomes associated with the National Action Plan. As three of the National Action Plan's strategic priorities relate to the criminal justice response to modern slavery (ie prevent; disrupt, investigate and prosecute; and support and protect), these interviews elicited information relevant to the current rapid assessment. Many of the government stakeholders approached to take part in a consultation for this research had previously (within the past six months) participated in consultations as part of the AIC's evaluation of the National Action Plan, and were given the option of allowing the information they provided during this previous consultation to be drawn on for the current research so as to avoid consultation fatigue. Use of these data to inform the current project was approved by the AIC Human Research Ethics Committee, and participant consent to use transcripts for this purpose was received prior to analysis.

Government stakeholders included those who worked in law enforcement, law and policy, regulation, and/or services and support. Non-government stakeholders included those who worked in prevention and advocacy, support services and/or academia. Consultations were undertaken with representatives from both national and state and territory government and non-government agencies.

Consultations with people with lived experience

Finally, this research draws on transcripts from individual and group interviews conducted with 34 people with lived experience of modern slavery or the impacts of modern slavery policy conducted by the Office of the Australian Anti-Slavery Commissioner. The broader purpose of these consultations was to inform priorities for the Commissioner's Strategic Plan 2025–2028 (including criminal justice priorities) and to ensure that the perspectives of people with lived experience of modern slavery and modern slavery policy directly inform the agenda and future research directions of this office. These interviews focused on understanding participants':

- experience of Australia's anti-slavery response;
- priorities for reform or improvement of Australia's anti-slavery response;
- experience of engagement with government and non-government stakeholders as lived experience experts; and
- views, priorities and preferences for engagement with government and non-government stakeholders as lived experience experts.

Use of these data to inform the current project was approved by the AIC Human Research Ethics Committee, and participant consent to use transcripts for this purpose was received prior to analysis.

Legal framework

The most recent examination of Australia's legal framework for modern slavery is the Attorney-General's Department's *Targeted review of modern slavery offences in Divisions 270 and 271 of the* Criminal Code Act 1995 *(Cth)* (the *Targeted review*; Attorney-General's Department 2023). Overall, this review found that Australia has a strong and comprehensive legislative framework for modern slavery that meets international obligations. However, it noted that there were opportunities to:

- strengthen the legal framework for modern slavery and ensure that they reflect international best practice and contemporary understandings of modern slavery in the Australian context;
- simplify and streamline Australia's modern slavery offences, noting that their complexity can complicate decision-making by criminal justice practitioners and result in the inconsistent application of offences; and
- clarify key terms, concepts and definitions underpinning offences in Divisions 270 and 271 of the *Criminal Code Act 1995* (Cth).

Importantly, the *Targeted review* recognised the need to ensure that Australia's criminal justice response to modern slavery is underpinned by a victim-centred, trauma-informed and harm minimisation approach that incorporates the voices of victims and survivors of modern slavery. These recommendations were supported by the United Nations (UN) Special Rapporteur on contemporary forms of slavery, including its causes and consequences (Obokata 2025), who also recommended that Australia establish a Human Rights Act and ratify remaining international instruments to better enshrine rights and protections and ensure that specific groups, particularly marginalised groups, do not fall through the cracks. International instruments yet to be ratified include: the *International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families*; the *International Convention for the Protection of All Persons from Enforced Disappearance*; the *Labour Inspection (Agriculture) Convention, 1969 (No. 129)*; the *Migration for Employment Convention (Revised), 1949 (No. 97)*; the *Migrant Workers (Supplementary Provisions) Convention, 1975 (No. 143)*; the *Indigenous and Tribal Peoples Convention, 1989 (No. 169)*; the *Work in Fishing Convention, 2007 (No. 188)*; and the *Domestic Workers Convention, 2011 (No. 189)*.

Interviews with government and non-government stakeholders expressed concerns with the complexity of Australia's legal framework for modern slavery. Notably, stakeholders reflected on the lack of consistent definitions of modern slavery and related terminology and the patchwork-like nature of the legal framework, which may result in inconsistent interpretation and complicate decision-making for criminal justice practitioners, particularly police and prosecutors (see also Attorney-General's Department 2023; Lyneham 2021). Stakeholders were particularly concerned that modern slavery and related conduct may be captured by multiple laws, including the *Criminal Code Act 1995* (Cth), the *Migration Act 1958* (Cth) and state and territory legislation. As such, stakeholders supported simplifying Australia's legal framework for modern slavery and introducing statutory guidance material for criminal justice practitioners to ensure that they have a thorough awareness of relevant legislation and can appropriately charge, investigate and prosecute modern slavery offences (see also Parliamentary Joint Committee on Law Enforcement (PJCLE) 2017).

The *Targeted review* (Attorney-General's Department 2023) comprehensively examines ongoing gaps and recommendations for specific offences under Divisions 270 and 271 of the *Criminal Code Act 1995* (Cth)—such as the limited definition of trafficking in persons and trafficking in children offences (see also Chazal & Raby 2024; Fitzgibbon, Fitzgibbon & Wijesinghe 2025; United States Department of State 2025). Therefore, these are not addressed in the current report.

Law enforcement and prosecution

Identifying modern slavery

Previous research into Australia's criminal justice response to modern slavery has found that this crime type is under-identified, and most offences are never reported to police. Indeed, a previous study estimated that there are four undetected victims of modern slavery for every identified victim in Australia (Lyneham, Dowling & Bricknell 2019). Under the *Recommended principles and guidelines on human rights and human trafficking* (Office of the UN High Commissioner for Human Rights (OHCHR) 2010), Australia is obligated to ensure that identification of modern slavery victims can and does take place to facilitate justice and access to support. As such, it is necessary to explore why current efforts are not identifying more victims and what opportunities exist to improve identification of modern slavery.

The Australian Federal Police (AFP) hold primary responsibility for investigating suspected modern slavery. The AFP may receive reports of suspected modern slavery from a range of sources, including state and territory police and other law enforcement agencies, government agencies, non-government organisations, frontline workers (eg in the education and healthcare sectors) and members of the public, who may refer themselves or others. The National Policing Protocol to Combat Human Trafficking and Slavery provides the national framework for police services to combat modern slavery, and formalises the AFP as the primary law enforcement agency responsible for investigating and prosecuting relevant offences.

Modern slavery reporting

Previous research has identified that victims and survivors of modern slavery may not be able or willing to report their experiences of modern slavery to law enforcement for a number of reasons, including:

- a lack of awareness of the concept of modern slavery, or a lack of recognition that their experiences constitute modern slavery or even victimisation more broadly (Boxall et al. 2023; George, Tsourtos & McNaughton 2018; Heys 2025; Nelson & Burn 2024; Office of the NSW Anti-slavery Commissioner 2023; US Department of State 2025);
- distrust of law enforcement, particularly due to observations about the way in which victims and survivors' communities are policed (eg enforcement of breaches of visa conditions in migrant communities; Australian Muslim Women's Centre for Human Rights 2019; Guthdrige & Vidal 2018; Obokata 2025; UNODC 2008; Vidal 2017);
- perceived implications for visa status (eg cancellation and deportation; Nelson & Burn 2024; Obokata 2025);
- fear of reprisal from perpetrators including violence or harm to their loved ones (Heys 2025; Lyneham & Bricknell 2018; Obokata 2025; UNODC 2008);
- ongoing relationships with perpetrators that may include financial dependence (Lyneham & Bricknell 2018; UNODC 2008), familial relationships (Lyneham & Bricknell 2018; Vidal 2017) or other relationships of trust (Heys 2025);
- ongoing impacts of trauma (Chazal & Raby 2024); and
- not knowing how or where to seek support (Lyneham & Bricknell 2018) or not having access to culturally safe and/or accessible support services (Attorney-General's Department 2024).

These barriers to reporting were acknowledged by government stakeholders, non-government stakeholders and people with lived experience of modern slavery consulted as part of this review. People with lived experience further identified that perpetrators may employ tactics to prevent or discourage victims and survivors from reporting their situations, such as preventing victims from having access to a phone, the internet or other people:

> Participant: I didn't have a mobile phone at the time and … they had a pin number on their landline. So I can't dial out … I didn't know where to ask for help … I thought no one will help me.
>
> Support person: The only time really you got to go out of the house in that three years was when the family took you to church.
>
> Participant: Yeah. They took me to church because … I've been doing all Indian prayers and … she got angry. Early morning, she said 'I don't want you to do any of this stuff in the house' … So I was going to healing prayers with them only on Sundays, only in and out, and they only sit beside me, so I can't talk to anyone. I think that was the reason they never left me alone. (Lived experience consultation 4)

Another respondent spoke about ongoing patterns of coercive control that may be used to coerce victims and survivors to remain in the situation:

> … [for] several reasons, I did not feel that I could leave. The first reason on the list would be his extreme anger at, or even the danger involved in, even questioning if you could leave … That danger and anger also landed on the other people that you spoke to [about leaving] … It was more a psychological thing at the start. But then obviously violence also came into it, use of substances and intoxication specifically for the purpose of maintaining control … physical intimidation, like breaking things next to you, screaming at you … I knew that he had in the past thrown someone up against a wall and choked them … A couple of girls that did manage to get out … He spent months stalking them and trying to figure out where they were working, what they were doing, who they'd spoken to, whom they'd influenced. So yeah, there was just a lot of coercion about not being able to leave. (Lived experience consultation 15)

Ultimately, this respondent reflected on how perpetrators may intentionally exploit the way in which victims and survivors are perceived by society more broadly to prohibit them from reporting and ultimately leaving the situation.

> [I was afraid] that if I came forward that I would be, you know, not believed and that no one would help us because people judge us, labelling us as drug addicts [and] sex workers that no one would listen to … those were all of the reasons that we were the perfect victim for the perpetrator. All of the things that make us the 'wrong' or 'bad' victim for services or justice processes make us the 'perfect victim' for the perpetrator. The perpetrators know who is unlikely to be believed or helped, which gives them even more power. (Lived experience consultation 15)

Barriers faced by victims and survivors in seeking help indicate the importance of the community in recognising and reporting possible situations of exploitation. Previous research has identified that community members are the people most likely to come in contact with someone who may be at risk of, or who is experiencing, modern slavery, and are a common source of reports to authorities (Brickell & McDonald 2025; United Nations Office on Drugs and Crime (UNODC) 2024; Unseen 2023). As such, the community's knowledge about modern slavery and reporting pathways can have tangible impacts on victim identification and access to support. Despite this, previous research indicates that awareness of human trafficking and modern slavery in Australia is limited, and that the crime is often misunderstood and unrecognised (Joudo Larsen et al. 2012). Low levels of awareness were found to contribute to low levels of reporting of human trafficking (Joudo Larsen et al. 2012). Government and non-government stakeholders similarly reflected on low levels of awareness of modern slavery in the community as a barrier to the successful identification of modern slavery and subsequent referral to investigation, with one government stakeholder questioning if Australia is 'really achieving what we need to achieve in delivering national awareness campaigns to the Australian community' (Government stakeholder consultation 8).

Australian Federal Police National Operations State Service Centre

Government and non-government stakeholders, and people with lived experience, spoke about limitations to the way suspected modern slavery can be reported to the AFP. The primary method by which victims and survivors, members of the public, non-government organisations and Australian Government agencies can report modern slavery victimisation is through the AFP's National Operations State Service Centre (NOSSC). The NOSSC is a centralised team that receives online or telephone reports about Commonwealth offences including modern slavery and assigns these reports to the appropriate team or officer for investigation (AFP 2025).

While acknowledging the importance of a national reporting system, non-government stakeholders and people with lived experience expressed concern that the NOSSC may not be accessible to victims and survivors who do not have the technology and/or English skills needed to make a report, and who face increased risk by making a report. Further concerns related to the NOSSC include AFP's preference for receiving reports online rather than by phone, extensive wait times (reported by a number of stakeholders as weeks or months) and inconsistent recognition or understanding of modern slavery by those receiving reports:

> I made two calls on the 131 AFP number and the frontline workers, they were not trained to take reports of modern slavery … They didn't really know what I was talking about. Then they forced me to the online form … However, I was very overwhelmed with the situation … The web form wasn't that user friendly … When you are either the victim or someone advocating for the victim, if they are in that deep trauma, it's very hard to put it in words … It's unrealistic to expect a victim to go online and do that … Then what if they have restricted internet access, or they have surveillance on them? So there's a mismatch there … I was like, I don't even know where this web form lands, if someone's going to look at it or not. (Lived experience consultation 3)

One non-government stakeholder suggested that this posed 'a huge issue for identification if we're making the system so hard to navigate that even the specialist organisations are having to fight so hard to get something allocated to the right person' (Non-government stakeholder consultation 1). Ultimately, non-government stakeholders indicated their belief that these issues may be attributable to the centralised team being overburdened and under-resourced.

In response to difficulties in reporting suspected modern slavery, previous reviews and broader research have recommended several measures to more effectively encourage and enable help-seeking among victims and survivors. This includes the establishment of a national modern slavery hotline that is not administered by law enforcement and is more accessible to culturally and linguistically diverse communities and people with a disability (eg Chazal & Raby 2024; Joint Standing Committee on Foreign Affairs, Defence and Trade (JSCFADT) 2017). The United Kingdom's Modern Slavery Helpline and Resource Centre (a confidential helpline administered by a non-government organisation which provides support to people wanting help, information or support for modern slavery) is often held up as a model (JSCFADT 2017).

Detection of modern slavery by law enforcement

Noting the substantial barriers to reporting of modern slavery, it is critical that law enforcement is able to effectively detect and respond to modern slavery (US Department of State 2025). Indeed, research has argued for the adoption of problem-solving and intelligence-led policing strategies to detect and investigate modern slavery, similar to those developed for organised crime investigations (eg David 2007; Farrell et al. 2012; see also UNODC 2008). Here, the two primary gaps identified in the literature and by stakeholders and people with lived experience are how modern slavery victimisation is proactively identified and low levels of awareness among law enforcement.

Proactive identification of modern slavery

In Australia, proactive identification of modern slavery victims primarily occurs through operations focused on identifying noncompliance with regulations such as those related to immigration or employment (eg Operation Inglenook; see Nixon 2023). A number of people with lived experience reflected on negative experiences and outcomes related to compliance-focused operations, such as the deportation of victims and survivors who had an unlawful migration status (see also Ditmore & Thukral 2012; Segrave, Milivojevic & Pickering 2018). Further, one person with lived experience described such actions as racially targeted:

> "There is inherent coercion and violence when it comes to raiding, particularly Asian migrant sex workers' workplaces. Because, you know, uniformed officers show up, they've got guns, they've got Tasers, right from the very start, the power imbalance is there. They don't have interpreters, so don't know what's happening … (Lived experience consultation 19)

Government stakeholders were aware of these concerns, noting that these experiences can impact law enforcement's ability to effectively undertake proactive identification of victims and survivors, and affect perceptions of police among victims and the community. One government stakeholder reflected on the importance of 'changing the narrative', to address fears that law enforcement are 'gonna detain you and deport you' (Government stakeholder consultation 11).

While compliance-based policing strategies are one way to prevent the burden of identification from falling solely on victims and survivors, stakeholders and people with lived experience emphasised the importance of ensuring that these strategies do not contribute to over-policing of vulnerable and minority populations. Further, the UN Special Rapporteur on contemporary forms of slavery, including its causes and consequences, noted that raids may 'drive individuals further underground, discouraging them from seeking help or engaging with authorities, which can perpetuate exploitation and abuse' (Obokata 2025: 14). That compliance-focused operations may have the unintended consequence of limiting victim identification suggests a need to consider complementary or alternative approaches to the proactive identification of victims. To this end, international reviews into Australia's response to modern slavery have recommended:

- more proactive monitoring of employers, labour hire companies and migration agents through regular inspections (Obokata 2025);
- enhancing international cooperation to share technical expertise, intelligence and best practice on modern slavery detection (Obokata 2025);
- screening for modern slavery indicators among vulnerable populations including undocumented migrants, asylum seekers, agricultural and hospitality industry workers, visa holders, domestic workers, and people working in the sex industry (US Department of State 2025); and
- investigating suspected modern slavery as such, rather than as a violation of employment conditions (US Department of State 2025).

It is important to acknowledge that law enforcement may already be using these and other strategies to proactively identify victims and survivors of modern slavery (eg intelligence-led policing); however, there was limited discussion of this in the literature. Further research on how proactive policing strategies are or may be used to improve how modern slavery is prevented, detected and responded to in a trauma-informed manner would therefore be beneficial. This research could draw on international experiences of policing modern slavery. For example, the United Kingdom's Modern Slavery Strategy specifies that regional organised crime units 'will proactively draw intelligence up from police forces and other local partners to map the regional picture' and that 'strategic and tactical intelligence on modern slavery is proactively shared' (Home Office 2014: 36). Relatedly, both the current Special Rapporteur on contemporary forms of slavery, including its causes and consequences (Obokata 2025) and the former Special Rapporteur on trafficking in persons, especially women and children (Ezeilo 2012) recommended that Australia collect and analyse disaggregated data on modern slavery to support victim identification.

Awareness of modern slavery

Successfully identifying modern slavery requires law enforcement to have a sufficient level of awareness of the issue and relevant indicators. Without sufficient awareness, police may misidentify modern slavery cases as other offences (Davy 2017) or misidentify victims of modern slavery as perpetrators of other offences (eg migration or drug offences). Previous research has identified low levels of awareness of modern slavery among law enforcement, particularly state and territory police (eg Davy 2017; George, Tsourtos & McNaughton 2018; Lyneham 2021). This finding was reiterated by government and non-government stakeholders, and people with lived experience, who often attributed low levels of awareness to the federal nature of Australia's modern slavery response. For example, one government stakeholder indicated:

> … the overemphasis on the Commonwealth Criminal Code has been … disastrous for the state level response. It has meant that state and territory police forces and criminal justice systems more broadly have completely under-invested in the capabilities needed to respond to these crimes. They see it as not their responsibility. As a result, they can't identify these offences. (Government stakeholder consultation 17)

Noting gaps in awareness among Commonwealth and state and territory law enforcement, previous reviews into Australia's criminal justice response have recommended improving training to empower officers to better recognise, assess and verify modern slavery, and refer victims and survivors to support services (Department of Home Affairs 2024b; JSCFADT 2017; PJCLE 2017; see also Ezeilo 2012; Obokata 2025; US Department of State 2025). Research from Australia (Irwin 2017) and overseas (eg Davy et al. 2020; Farrell, McDevitt & Fahy 2010) has identified that training completion is associated with increased rates of victim identification and subsequent investigation.

Modern slavery training for law enforcement is predominately delivered under the AFP's Look a Little Deeper Program. This is a training and awareness program developed in 2014 to support law enforcement to recognise indicators of modern slavery and respond to people in or at risk of modern slavery (AFP 2023). Since this time, all state and territory police agencies and several Commonwealth law enforcement, regulatory and other frontline agencies have adopted the Look a Little Deeper Program, including the AFP, Australian Border Force, Department of Home Affairs, Department of Foreign Affairs and Trade, Fair Work Ombudsman and Services Australia. The Look a Little Deeper Program was estimated to have reached more than 140,000 members of Commonwealth, state or and territory agencies between 2019 and 2023 (AFP 2023). While training gaps may remain, it is encouraging that the program continues to expand its reach to many agencies who may have contact with victims of modern slavery. At the time of writing, this program has not been evaluated.

While government and non-government stakeholders acknowledged the importance of the Look a Little Deeper Program, they highlighted a number of concerns about this and other training programs delivered or funded by the Australian Government:

> I don't think it's good enough that some people have one session of [training] every two, three, four, five years and then we run a refresher every now and again when the resources are available … We actually need to make sure that every frontline officer is aware, at all points, of what they need to do. (Government stakeholder consultation 8)
>
> It relies on the culture of the local area command police station … So that's a massive problem that it's not consistent, it's not embedded, and it's not a responsibility … It's terrible that there's not more investment into [state and territory police officers'] training and development [in relation to modern slavery]. (Non-government stakeholder consultation 1)

In response to these concerns, stakeholders and people with lived experience made a number of recommendations that may improve training for law enforcement to ensure more accurate and timely identification of modern slavery victims. These include:

- mandating training completion at different stages of police officers' careers, noting high turnover of staff—for example, in broader training programs for recruits, as a requirement for fulfilling certain positions, or as ongoing and mandatory training (see also Lyneham 2021);
- updating training programs regularly to address the evolving nature of modern slavery in Australia; and
- involving service providers and/or people with lived experience in the development or delivery of training (see Dowling 2024 for a discussion of this in the context of police training in responding to family, domestic and sexual violence).

Importantly, stakeholders acknowledged that implementing such changes would be difficult due to ongoing funding and personnel constraints, which also impede law enforcement's ability to ensure the consistent presence of specialist staff who can identify and respond to modern slavery. For example, one government stakeholder questioned whether there was sufficient funding and resourcing for law enforcement to have a 'priority one response' to modern slavery and suggested that 'funding has to improve if we're to evolve and continue to change and meet the requirements … and make sure that victims are supported' (Government stakeholder consultation 8). Importantly, training and specialist staff are both associated with improved rates of victim identification and investigation (eg Davy et al. 2020; Jurek & King 2020).

Investigating and prosecuting modern slavery

Between 2004 and 2023, 30 people were convicted of offences under Divisions 270 and/or 271 of the *Criminal Code Act 1995* (Cth) (Attorney-General's Department 2023). However, the attrition rate of modern slavery matters through the criminal justice system is high, with the most recent figures indicating that around three-quarters of defendants referred for prosecution between 1999 and 2017 were not convicted of a modern slavery offence (Lyneham 2021). Over this time period, prosecutions were least likely to obtain a conviction for debt bondage offences, followed by trafficking in persons (including children) and servitude. Encouragingly, recent data from the AIC's Human Trafficking and Modern Slavery National Minimum Dataset shows a substantial uptick in investigative and prosecutorial success. These data show that six defendants were convicted of a total of nine modern slavery offences in 2022–23 (McDonald & Bricknell 2025) and five defendants were convicted of a total of nine modern slavery offences in 2024–25 (Bricknell & McDonald 2025).

Importantly, criminal justice practitioners may use other legislative provisions when investigating and prosecuting modern slavery and related conduct (eg *Migration Act 1958* (Cth) or state and territory legislation; see Moore et al. 2019; Segrave, Milivojevic & Pickering 2018). Some government and non-government stakeholders indicated that these offences 'provide another avenue to prosecute egregious offences … without having to hit that threshold of the human trafficking cases' (Government stakeholder consultation 12) and may be preferable for some victims and survivors (see also Segrave 2017). However, other government and non-government stakeholders noted concerns that these cases may not be captured in crime statistics for modern slavery offences (eg the AIC's aforementioned Human Trafficking and Modern Slavery National Minimum Dataset; see also Segrave, Milivojevic & Pickering 2018), which may impact future resourcing and funding allocation (see also Heys 2025) and referrals to appropriate support services, particularly for vulnerable populations such as children.

Operational challenges

Investigating and prosecuting modern slavery cases is inherently complex (eg Davy 2017; Heys 2025). This is particularly true of matters with an international dimension. Factors outside of the control of police, prosecutors and other criminal justice practitioners may impact the outcomes of modern slavery investigations and prosecutions (eg resourcing issues, availability of evidence and court delays; Heys 2025). Discussed below are two operational challenges and related opportunities to strengthen the investigation and prosecution of modern slavery cases that were particularly salient in the literature, and in consultations with government and non-government stakeholders, and people with lived experience.

Reliance on victim testimony

Victim testimony is central to investigating and prosecuting modern slavery offences and is often relied upon as the primary or only source of evidence (Demeke 2024; UNODC 2017). However, victims and survivors may not wish to participate in a criminal justice process for a number of reasons, including not identifying themselves as victims, lacking trust in the criminal justice process, and viewing cooperation as inconsistent with their best interests (see Lyneham 2021). Where victims and survivors do decide to participate in a criminal justice process, their testimony may be challenged for a number of reasons:

- they may provide inconsistent and non-linear accounts of their victimisation due to fear, memory issues related to trauma or a desire to protect themselves or family members (Chazal & Raby 2024; Davy 2017; Farrell, Owens & McDevitt 2014; Heys 2025; Lyneham 2021; UNODC 2017);
- access to visas allowing them to remain in Australia and/or access to support services can be contingent on their participation in criminal justice processes, creating a perception that their testimony is motivated by access to visas (Lyneham 2021; Segrave, Milivojevic & Pickering 2018); and
- the prosecution may rely on biases, particularly in the context of sexual exploitation, where myths and stereotypes about sex work may result in victims and survivors being deemed to be less legitimate victims and less credible witnesses (Chazal & Raby 2024; Davy 2017).

In response to these concerns, it has been recommended that training be expanded for the judiciary, judicial officers, prosecutors and lawyers on understanding, prosecuting and managing these cases (JSCFADT 2017; US Department of State 2025).

Government and non-government stakeholders, and people with lived experience, identified reliance upon victim testimony as a critical barrier to investigating modern slavery. Specifically, stakeholders were concerned that decisions to proceed with an investigation and prosecution of a modern slavery offence were often overly reliant on a victim's initial testimony and misinformed perceptions of their credibility (or lack thereof). A number argued that other sources of evidence (eg contact with healthcare and support services, electronic evidence and financial evidence such as wage payments) are not always fully explored (see also David 2007; Davy et al. 2020; Organization for Security and Co-operation in Europe 2010; UNODC 2008). For example:

> … we're far too reliant on victim testimony and the reality is we could be putting more effort into conducting investigations … [investigation and prosecution] requires a multi-faceted approach. (Non-government stakeholder consultation 7)
>
> I think it's really interesting in an Australian context that we rely so significantly on victim testimonial in the investigation process. [In other countries] there is a much stronger focus on following the money trail and looking at other forms of digital evidence. (Non-government stakeholder consultation 9)

Another non-government stakeholder noted that the first slavery conviction under the *Criminal Code 1995* (Cth) (*R v Wei Tang* [2009] VSCA 182) involved victim testimony that was found to have numerous credibility issues including outright lies but was supported by other evidence such as financial records and videos of the room in which victims were held (see also UNODC 2017). Relatedly, a number of non-government stakeholders indicated that investigating officers had never contacted them to request information that could be used as evidence or intelligence, despite their willingness to consider these requests. Further, a number of people with lived experience spoke about having prepared evidence to provide to law enforcement but never being given an opportunity to do so. Ultimately, non-government stakeholders were concerned that over-reliance on victim testimony may limit the likelihood of successful prosecutions, as well as the ability of vulnerable victims and survivors (eg those with a disability, cognitive impairment, mental health needs or substance use) to access justice.

Collaboration between government agencies

Previous research has identified the need for modern slavery investigations and prosecutions to prioritise effective inter-agency cooperation and collaboration, including within and between jurisdictions (eg Moore 2018; Tan & Vidal 2023). Further, international evidence suggests that collaboration between law enforcement and service providers increases victims and survivors' willingness to engage with the criminal justice system and increases the likelihood of successful investigations and prosecutions (Annison 2013; Davy et al. 2020; Van Dyke & Brachou 2021). As such, previous reviews into Australia's criminal justice response to modern slavery have identified a need to ensure that responses are coordinated and cooperative, particularly noting the number of Commonwealth, state and territory governments and civil society agencies involved in responding (eg JSCFADT 2017; PJCLE 2017). This could be done by establishing a standing Modern Slavery Joint Taskforce, which could ensure that criminal justice practitioners have well established connections and clearly defined roles and responsibilities (eg JSCFADT 2017; Nixon 2023). Taskforces have been identified as an effective model for preventing and responding to modern slavery internationally (eg Organization for Security and Co-operation in Europe 2010; UNODC 2008). International research has also found that multi-agency partnerships improve the identification and investigation of modern slavery and contribute to successful prosecutions (Annison 2013; Farrell et al. 2012; Farrell, McDevitt & Fahy 2008). Multi-agency partnerships may be most effective when they are underpinned by regular meetings, protocols and training (Farrell, McDevitt & Fahy 2008). In an Australian context, research has argued for a shift away from a federally-focused model to 'a decentralised, but connected model that fosters learning, cooperation and capacity building across a broader range of stakeholders' to better engage states and territories (Moore 2018: 10).

The National Policing Protocol to Combat Human Trafficking and Slavery is intended to support cooperation between the AFP and state and territory police agencies (AFP 2026). However, government and non-government stakeholders, and people with lived experience, similarly expressed their belief that there remains a need for improved cooperation between federal and state and territory law enforcement agencies during investigation and prosecution. For example, non-government stakeholders observed that cases reported to state and territory police agencies are inconsistently referred to the AFP for investigation. They further noted that this issue particularly affects victims and survivors of forced marriage, whose cases may be more likely to be reported to state and territory police, child protection agencies and/or support services (see also Guthdrige & Vidal 2018). Further deficiencies in coordination between law enforcement agencies have been observed in situations where responsibility for investigation is shifted from one police agency to another.

Insufficient communication and collaboration may result in cases not being investigated or victims and survivors needing to provide the same evidence to multiple parallel investigations. People with lived experience described this as impacting their wellbeing and safety. For example, one participant described an interaction with a state and territory police agency in which the officers 'got really confused about it being a multi-jurisdictional issue … even within [the state] they were confused as to where to send it, so then it eventually ended up in the location where my perpetrator lived' (Lived experience consultation 15). Noting these impacts, stakeholders emphasised the importance of government agencies improving communication with each other, and ensuring there are appropriate and effective protocols or mechanisms to facilitate this (see also David 2007; Moore 2018).

Victims and survivors' experiences navigating the criminal justice process

International evidence suggests that victims and survivors' willingness and ability to engage with criminal justice processes increases when they receive appropriate, victim-centred and trauma-informed support during the investigation and prosecution of modern slavery (Annison 2013; David 2007; Davy et al. 2020; see also Nichols & Heil 2024). This includes 'creating an environment of trust, promoting a sensitivity to trauma by those interviewing the victims and fostering conditions of physical and psychological safety for the victim' (UNODC 2017: 20). Research with victims and survivors in the United States suggests that a victim having space to tell their story, feeling involved in decisions about their involvement in a criminal investigation, and receiving transparent communication and respectful treatment are integral to a feeling of justice (Yu et al. 2018). Communication is particularly important noting the lengthy timeframes that may be associated with modern slavery investigations and prosecutions (Heys 2025). Conversely, a lack of cultural competence, ineffective communication and inadequate support for victims and survivors limits their ability to disclose experiences of modern slavery and engage with the criminal justice process (Heys 2025). Trauma-informed practice also relates to the extent to which the criminal justice system is able to support culturally and linguistically diverse and other vulnerable populations to participate in matters (eg Annison 2013; Heys 2025; Nichols & Heil 2024).

Interviews with government and non-government stakeholders, and people with lived experience, indicated a concern that trauma-informed practices are being inconsistently applied during modern slavery investigations and prosecutions, particularly by police. Some stakeholders and people with lived experience reported positive interactions with police, which broadly centred on victims and survivors feeling heard and respected, having their needs met, and feeling communicated with:

> … there was a lady [AFP] officer and [she] was very gentle and very good. They asked me questions like they understand that I'm new and I feel confident that … I can talk to them and that they can help me'. (Lived experience consultation 12)
>
> … they kept coming to check every night to see if we safe. I think they used to patrol around the area and after that they come and knock [and ask] 'is everything alright?' (Lived experience consultation 5)
>
> I was so lucky. [The AFP] were really good … I think they did very well and they explained everything very well and then every step they took, they explained … what we are going to do next. (Lived experience consultation 4)

However, other people with lived experience described their interactions with police more negatively:

> I was giving my statement, but I didn't feel comfortable at all because they didn't let my caseworker sit there with me … It would have been good having some legal assessment beforehand provide the accurate information to be aware of the kinds of questions that they were going to ask. Also, I think it would have been good having an interpreter because many of the things I wanted to express I couldn't because I didn't know how to say it in English. Or I was confused about some of the things that they were asking me … [After the first interview] we met again at the local police station. But at the car park, not even in an office. And this time it was two male police officers and … they sat me in the car, in the back part. And one of them sat next to me on my left and the other one at the front. And that made me feel really scared and really uncomfortable … I feel uncomfortable with men, and especially if they were police officers. It made me feel like a criminal. (Lived experience consultation 6)
>
> I waited almost a year to have the AFP listen. They were so encouraging, they said 'come in for as many videos as you want to, give us all the details, no matter how little they are' … Then they threw me curveballs, and then they just completely cancelled me out of nowhere. So that was really not professional … Is it because it wasn't trafficking or is it because it's difficult to corroborate or is it better in [state police agency's] hands? Because you're giving me three different things. And either way, why didn't you tell me this six months ago when you had all the information … I've been really distressed by that. (Lived experience consultation 8)

Overall, non-government stakeholders and people with lived experience indicated their belief that experiences with police were dependent on the extent to which individual officers employed trauma-informed practices in their interactions with victims and survivors (see also Nichols & Heil 2024). For example, one non-government stakeholder noted that an officer 'has quite a big impact on the case and the communication and sometimes even the outcome …' (Non-government stakeholder consultation 3). Together, these experiences indicate that, while police are employing trauma-informed practice, there is ongoing inconsistency in its implementation. As such, non-government stakeholders and people with lived experience reflected on trauma-informed principles that should be consistently applied throughout the criminal justice process, including:

- building rapport with victims and focusing on their emotional wellbeing;
- ensuring interviews with victims are private and comfortable, are not rushed (noting impacts of trauma, language barriers and cultural norms) and are supported by informed consent procedures;
- ensuring sufficient record keeping so that victims don't need to provide subsequent or repeated statements;
- ensuring that throughout the criminal justice process victims have access to required support people and interpreters who speak their language, understand their cultural background and are able to effectively interpret and communicate evidence provided to an investigation; and
- prioritising ongoing and open communication with victims throughout the criminal justice process, particularly in response to an initial report, where there are changes to the investigative officer (which happens regularly given the length of these investigations), when the case is closed, or when the case is transferred to state and territory police for investigation.

Government and non-government stakeholders, and people with lived experience, argued that incorporating trauma-informed practices such as these more consistently into modern slavery investigations and prosecutions may prevent retraumatisation, improve victim participation in the criminal justice process and contribute to punishment and deterrence outcomes. Importantly, it is acknowledged that some or all of these strategies are likely already being implemented, and that the variation in practice could reflect high staff turnover, resource constraints, and inconsistencies or long delays in the delivery of training.

Legal protection and support

Trauma-informed practice also relates to providing legal protection and support to victims and survivors while they are engaged with the criminal justice system, which is crucial to ensuring that they continue to participate (Annison 2013; Boxall et al. 2023; Davy et al. 2020). This is particularly important noting the centrality of victim and survivor testimony to the successful investigation and prosecution of modern slavery cases. Legal protections may include limitations on the disclosure of witness identity, evidentiary rules to permit victims and survivors to provide their testimony safely (eg in a closed court) and procedures ensuring that victims and survivors are not able to be cross-examined by self-represented defendants (see also Attorney-General's Department 2024; OHCHR 2010). It may also include the provision of legal representation to victims (UNODC 2008).

In Australia, legal support for victims and survivors during prosecution is primarily provided through the Commonwealth Director of Public Prosecution's Witness Assistance Service. This service works with prosecutors to ensure that vulnerable victims of crime have access to information about and support for their case (Commonwealth Director of Public Prosecution 2025). While acknowledging the importance of the Witness Assistance Service, some non-government stakeholders raised concerns that its limited resources mean it is not available in-person in all jurisdictions. They further noted that support is primarily provided in and around court appearances, which can make it difficult to establish trust and rapport with victims and survivors. These stakeholders also thought that support for victims during prosecution could be bolstered by improving access to independent legal support for the duration of the criminal justice process, and allowing long-term case managers to support victims alongside Witness Assistance Service staff, noting that this period is typically one of heightened need and risk.

Victims and survivors may also be referred to legal support through the Support for Trafficked People Program (STPP). However, some government and non-government stakeholders were uncertain about how many referrals are being made and whether victims and survivors are receiving the support they need. The importance of legal support for victims is reflected in the JSCFADT's (2017) recommendation that the Australian Government consider better ways to enable victims and survivors to access legal aid. In addition, the US Department of State (2025) has emphasised the need for Australia to improve the availability and quality of protection services, including legal assistance, for all identified and suspected victims of modern slavery. As such, research into the current and required availability and accessibility of legal support for victims would be of benefit.

Protecting victims and survivors of modern slavery

Visa framework

The Human Trafficking Visa Framework (HTVF) was established in 2004 (and was then called the People Trafficking Visa Framework). It allows suspected victims and survivors—and their immediate families—who do not already hold a valid visa to remain in Australia lawfully to access the STPP and to participate in a criminal investigation into modern slavery. The HTVF consists of the Bridging visa F and the Referred Stay visa. The Bridging visa F allows suspected victims and survivors of modern slavery to remain in Australia for an initial period of 45 days to rest and recover (Department of Home Affairs 2024b). It is accessible to suspected victims of modern slavery and their immediate family members who are identified and referred to the Department of Home Affairs by the AFP or state or territory police. The Bridging visa F also allows for a longer term stay to be granted where victims and survivors are able and willing to participate in a criminal investigation and prosecution. The Referred Stay visa provides a permanent visa pathway for suspected victims of modern slavery and their immediate family members who are certified by the relevant Minister or their delegate to meet a number of criteria under the Migration Regulations 1994 (Cth), including that they are located in Australia, they have contributed to and cooperated closely with a criminal investigation, they are not a subject of the investigation or resulting prosecution, and they would be considered to be in danger if they were to return to their home country.

Previous reviews into Australia's criminal justice response to modern slavery have recommended strengthening visa protections for visa holders who have been subject to modern slavery (eg JSCFADT 2017, 2013; PJCLE 2017). These recommendations have included:

- de-linking access to the HTVF from compliance with investigations (JSCFADT 2017, 2013);
- granting the ability to refer suspected victims of modern slavery to the HTVF to other government agencies (eg Australian Border Force and Fair Work Ombudsman) and approved non-government organisations (JSCFADT 2017); and
- extending the initial 45-day period to a minimum of 90 days, with options for extension (JSCFADT 2017).

The UN Special Rapporteur on contemporary forms of slavery, including its causes and consequences, has similarly recommended expanding eligibility for the HTVF to increase accessibility for vulnerable groups at risk of exploitation to ensure they are able to access support (Obokata 2025). These recommendations are supported by the broader literature, which has identified that eligibility criteria for the HTVF, particularly for the Referred Stay visa, are unnecessarily narrow, potentially limiting victims and survivors' ability to access essential support (eg Anti-Slavery Australia 2016; Davy 2017; Ezeilo 2012; Raby et al. 2023). Further, it has been argued that an initial period of 45 days is an inadequate timeframe for victims and survivors to 'reflect and make critical decisions' (Ezeilo 2012: 14).

People with lived experience articulated the importance of granting visas to modern slavery victims, whose visa status may be impacted by experiences of exploitation. For example, one participant described not wanting to be 'an illegal citizen and illegal person in this country' (Lived experience consultation 10) once they were supported to leave their circumstances of exploitation. However, a number of government and non-government stakeholders indicated their concern that the Bridging visa F was often not granted, or not granted early enough following victim identification, resulting in victims and survivors being without a valid visa or needing to remain on their current visa, which is often tied to their trafficking experience and may have additional limitations (eg on work or study). This, in turn, may affect victims and survivors' ability to remain engaged with the criminal justice system and to access support. Finally, one non-government stakeholder described decisions on whether or not to grant a Referred Stay visa as 'beyond opaque and highly discretionary' (Non-government stakeholder consultation 4) and noted the lack of appropriate mechanisms for review.

Migrant workers

It has been further recommended that the Australian Government review and improve visa settings and protections for temporary migrant workers (Cockayne, Kagan & Ng 2024; JSCFADT 2017; Nixon 2023). Particular attention has been drawn to the need to ensure that minor breaches of visa conditions do not result in visa cancellation and that migrant workers are able to remain in Australia should they need to pursue claims related to their employment conditions and/or access rehabilitation and compensation schemes (JSCFADT 2017; Senate Education and Employment References Committee 2016). Importantly, these recommendations are being addressed by the Strengthening Reporting Protections (Department of Home Affairs 2024a) and Workplace Justice Visa (Department of Home Affairs 2025) pilot programs, which at the time of writing have not been evaluated.

Protection orders

Protection orders, such as an order to prevent international travel, may be used to protect children at risk of forced marriage under the *Family Law Act 1975* (Cth). While adults in or at risk of forced marriage may be able to seek protection under state and territory domestic and family violence legislation (eg domestic violence orders), there are currently no provisions in Commonwealth law designed to protect this population (Askola 2018). As such, previous inquiries into Australia's criminal justice response to modern slavery have recommended explicitly extending the application of protection orders in relation to forced marriage to people aged over 18 years (JSCFADT 2017; PJCLE 2017). Forced marriage protection orders were introduced in the United Kingdom in the late 2000s as a civil injunction to protect people in or at risk of a forced marriage. Recent research into these orders suggests they are an important preventative mechanism, but they may increase risk of abuse perpetrated against victims and survivors (Anitha, Gill & Noack-Lundberg 2023). Consequently, it has been suggested that forced marriage protection orders would be most effective when supported by a strong support service system, inter-agency coordination, training of relevant stakeholders and protocols to manage and mitigate risk (Attorney-General's Department 2024; Anitha, Gill & Noack-Lundberg 2023).

Non-government stakeholders supported extending the application of protection orders to adults in or at risk of forced marriage. They argued that this would also provide police, including state and territory police, with a greater opportunity to intervene in and disrupt offending if required. People with lived experience similarly supported the introduction of a forced marriage protection order, noting that it would ensure consequences for perpetrators without risking their visa status or employment. Stakeholders also recommended the introduction of something comparable to the United Kingdom's child abduction warning notices, which are used to warn an individual that they do not have permission to contact or associate with a specific child and that they will be arrested if they fail to abide by the conditions of the warning notice. This may help disrupt potential trafficking in children or child exploitation more broadly. Finally, the JSCFADT (2021) recommended the Australian Government ensures support is provided to Australians who are overseas and are in or are at risk of forced marriage, including by establishing a repatriation protocol. A repatriation protocol would mean that Australians overseas who are in or at risk of forced marriage are able to receive prompt and streamlined assistance to return to Australia, rather than having to independently coordinate and fund their return (see also Obokata 2025).

Non-punishment of victims of modern slavery

Under the *Recommended principles and guidelines on human rights and human trafficking*, 'Trafficked persons shall not be detained, charged or prosecuted for the illegality of their entry into or residence in countries of transit and destination, or for their involvement in unlawful activities to the extent that such involvement is a direct consequence of their situation as trafficked persons' (OHCHR 2010: 1). This is referred to as the 'non-punishment principle' and it aims to protect the rights of victims and survivors, encourage victims and survivors to report modern slavery victimisation and participate in criminal justice processes, and ensure that victims are not punished for the conduct of traffickers (Inter-Agency Coordination Group against Trafficking in Persons 2020). Full implementation of the non-punishment principle requires identifying a person as a victim of trafficking as soon as possible and ensuring that no prosecution or other punitive measures are initiated in situations where an offence is committed as a consequence of trafficking victimisation (Piotrowicz & Sorrentino 2016). These measures are argued to be critical in the effective identification and protection of victims and survivors (Davy et al. 2020).

In Australia, the non-punishment principle is primarily enacted through general defences in the *Criminal Code Act 1995* (Cth) that defendants may raise in relation to a prosecution for a Commonwealth offence. The non-punishment principle may also be applied through the Prosecution Policy of the Commonwealth Director of Public Prosecutions, which underpins decisions made throughout the prosecution process. The Prosecution Policy emphasises fairness and consistency, and requires prosecutors to satisfy a two-stage test before commencing prosecution: that there is sufficient evidence to prosecute a case, and that the prosecution is in the public interest. Finally, the *Director of Public Prosecutions Act 1983* (Cth) provides the Director with discretion not to use information provided by a person in evidence against them, or not to prosecute a Commonwealth offence.

Previous research has argued that existing defences may not be broad enough to apply to all situations in which victims and survivors may have to commit an offence to 'escape, endure, or survive the trafficking situation' (Schloenhardt & Markey-Towler 2016: 21). Indeed, it has been argued that the non-punishment principle should not be limited in its application and should apply to any offence committed as a consequence of trafficking (Piotrowicz & Sorrentino 2016). Some government and non-government stakeholders were therefore concerned that Australia may not be adequately upholding the non-punishment principle. Specifically, stakeholders raised concerns that Commonwealth and state and territory prosecutors were not adequately taking defendants' circumstances of modern slavery into consideration when making decisions to charge or prosecute. This was argued to be 'not a semantic or policy issue, it is absolutely devastating to the human rights of individuals' (Government stakeholder consultation 17).

In response to such concerns, the JSCFADT (2017) recommended the introduction of a defence for victims (and associated guidance for criminal justice practitioners) that builds upon the model under s 45 of the United Kingdom's *Modern Slavery Act 2015* and draws on best practice. It was further recommended that this model should provide a path for appeal and/or expungement of criminal convictions for victims of modern slavery who have previously been convicted but who may have legitimate defences (see also Inter-Agency Coordination Group against Trafficking in Persons 2020). The JSCFADT (2017) and government and non-government stakeholders suggested that implementing a defence for victims of modern slavery may also encourage reporting and engagement with criminal justice processes.

Supporting victims and survivors of modern slavery engaged in the criminal justice system

Support for Trafficked People Program

Accessing support is essential to victims and survivors' recovery, contributes to preventing potential revictimisation and supports participation in the criminal justice system (Davy et al. 2020). The primary support service for victims and survivors of modern slavery is the STPP. The STPP was established in 2004 to help victims and survivors 'in meeting their safety, security, health and well-being needs' (Department of Social Services 2025: np) on referral from the AFP. The STPP is administered by the Department of Social Services and delivered by the Australian Red Cross. Case managers help victims and survivors to access required services, which may include accommodation, medical treatment, counselling, referral to legal and migration advice, skills development and training, and social support (Department of Social Services 2025). Depending on their circumstances, victims and survivors may be referred to one of five streams:

- Intensive Support Stream, which provides intensive support to all people referred to the STPP for 90 days, regardless of their participation in a criminal investigation;
- Forced Marriage Support Stream, which provides intensive support to clients who are in or at risk of a forced marriage for up to 200 days. The Forced Marriage Support Stream stopped accepting clients in March 2025, when the Australian Government began transitioning to the Forced Marriage Specialist Support Program. This program is delivered by Life Without Barriers and provides tailored support for an unlimited period without requiring victims and survivors to engage with the criminal justice system;
- Justice Support Stream, which provides support until the investigation and prosecution of a modern slavery matter is finalised;
- Temporary Trial Support Stream, which provides intensive support for trafficked people who return to Australia to give evidence to a human trafficking investigation; and
- Transition Stream, which supports clients leaving the STPP to transition back into life beyond the STPP for 20 working days.

Access to the STPP requires that a victim or survivor is an Australian citizen or holds a valid or regularised visa. A person who has experienced modern slavery in Australia and who does not hold a visa may be able to access the HTVF to allow them to stay in Australia while participating in the STPP. Importantly, however, this requires a person to be engaged with the AFP.

Recent reviews and inquiries have recommended a number of changes to the STPP, including de-linking access from cooperation with criminal investigations (JSCFADT 2017; Obokata 2025; PJCLE 2017; see also Boxall et al. 2023; Chazal & Raby 2024; Davy 2017; George, Tsourtos & McNaughton 2018; Guthdrige & Vidal 2018), allowing victims and survivors to be referred to the STPP by other approved entities (JSCFADT 2017), and extending the initial support period from 45 days to 90 days (JSCFADT 2017). Encouragingly, all of these recommendations have been addressed through recent increases in funding for the STPP and program reforms. These have included extending the initial support period to 90 days and funding the Additional Referral Pathway pilot, which allows victims and survivors to be referred to the STPP by approved community service providers without engaging with the AFP (Rishworth, Dreyfus & Elliot 2023). This pilot is delivered by the Salvation Army and, at the time of writing, is set to run until 30 June 2027 (Salvation Army & Anti-Slavery Australia nd).

The Additional Referral Pathway is currently being evaluated, but government and non-government stakeholders indicated their belief that this is a positive step towards a more trauma-informed approach to referrals, particularly for victims of modern slavery perpetrated by a family member whom the victim does not wish to be charged. Non-government stakeholders were, however, concerned that this referral pathway does not completely de-link the STPP from compliance with criminal investigations, as victims and survivors are required to participate in investigations if they wish to access support beyond the initial 90-day period (see also Chazal & Raby 2024; Obokata 2025; US Department of State 2025). Finally, a number of government and non-government stakeholders were concerned that children cannot be referred to the STPP under the Additional Referral Pathway, noting that referral from the AFP may be delayed due to resourcing constraints. The UN Special Rapporteur on contemporary forms of slavery, including its causes and consequences, indicated further concerns that children in such situations would trigger mandatory reporting to state and territory child protection services, the response from which may be limited (Obokata 2025). Indeed, one non-government stakeholder reflected on referral processes for child victims of modern slavery and indicated that they would be 'scared for that to occur because I am not confident that we would get the response we need' (Non-government stakeholder consultation 1).

Despite the extension of the initial period of support to 90 days, government and non-government stakeholders, and people with lived experience, remain concerned about the time-limited nature of the STPP. They argued that victims and survivors often have long-term needs that cannot be met in the initial 90-day period. One person with lived experience said:

> … more help around long-term planning would have been useful—like clearer guidance on my visa options or how to access mental health support beyond the crisis stage. Sometimes it felt like I didn't know what steps to take next once the immediate help was given. Having that kind of roadmap could've made things less overwhelming. (Lived experience consultation 22)

Providing victims and survivors with unconditional support and time to focus on their recovery by addressing their critical needs (eg housing, employment or family law issues) may also help them to report from a position of strength and be better equipped to participate in an investigation and prosecution (see also Vidal 2017). Non-government stakeholders also recognised the importance of ensuring that victims and survivors who do wish to be involved in the criminal investigation receive tailored support to do so. Consequently, non-government stakeholders recommended reforming support to be needs-based rather than time-based, which would allow victims and survivors to receive support under the STPP when and how they need. International evidence also recommends the implementation of needs-based support rather than support driven by timeframes or eligibility criteria to ensure that it is person-centred, encourages a successful transition to independence and protects victims and survivors from revictimisation (Gren-Jardan & Gleich 2022).

Government and non-government stakeholders, and people with lived experience, raised further concerns about eligibility requirements for the STPP. Notably, the requirement for victims and survivors to have Australian citizenship or a valid visa may exclude a large number of victims from accessing support (unless they are able to access a visa under the HTVF; see also Obokata 2025). Noting these concerns, the UN Special Rapporteur on contemporary forms of slavery, including its causes and consequences, has recommended that the Australian Government expands eligibility criteria for the STPP to include undocumented migrant workers (Obokata 2025). Further, non-government stakeholders indicated that victims and survivors whose cases are being investigated by state or territory police are typically unable to access support under the STPP and may receive limited support from state-based services. This was attributed to the nature of relevant state-based support services, which are typically designed for victims and survivors of family, domestic and sexual violence; which may have a limited understanding of or ability to respond to modern slavery (see also Askola 2018); and which receive no federal funding to support victims of modern slavery. Non-government stakeholders argued that these barriers could be overcome by developing coordinated and multidisciplinary responses to safety planning and support provisions (see also Vidal 2017) and improving coordination between Commonwealth and state and territory governments, police, child protection agencies and support services.

Finally, non-government stakeholders highlighted concerns that support provided under the STPP may not be sufficiently specialised for high-risk and vulnerable populations who have specific therapeutic needs, including children (see also Askola 2018; Ezeilo 2012; Fitzgibbon, Fitzgibbon & Wijesinghe 2025; OHCHR 2010; Singhateh 2022), victims and survivors who have children (see also Chazal, Raby & Spasovska 2023), victims and survivors with a disability (see also Mebalds & Garcia-Daza 2021; Obokata 2025), and First Nations victims and survivors (see also Obokata 2025). This may be, in part, related to concerns about the funding and resourcing constraints of community service providers (see also Nelson & Burn 2024; Obokata 2025). Indeed, the JSCFADT (2017) recommended that funding be continued for non-government and civil society organisations to support victims of modern slavery, and that funding be increased where appropriate. The UN Special Rapporteur on contemporary forms of slavery, including its causes and consequences, has similarly recommended that the Australian Government increase funding for frontline service providers (Obokata 2025).

Remedy for victims and survivors of modern slavery

The importance of ensuring that victims and survivors can access effective remedy has been repeatedly highlighted in the literature (eg Attorney-General's Department 2025, 2023; Simmons, Burn & McLeod 2022). Remedy can assist victims and survivors in their recovery by supporting them as they rebuild their lives and reintegrate into society, acknowledging the harm suffered, and reducing the risk of revictimisation by providing financial security (Attorney-General's Department 2025; Simmons, Burn & McLeod 2022). Importantly, the right to effective remedy is included in six international instruments to which Australia is obligated, most notably the *Protocol to Prevent, Suppress and Punish Trafficking in Persons*.

Currently, remedy is primarily available to victims and survivors through victims of crime financial assistance and compensation schemes at the state and territory level. A previous review of these schemes (Attorney-General's Department 2025) and broader research (eg Simmons, Burn & McLeod 2022) have identified a number of limitations of these schemes for victims and survivors of modern slavery, specifically:

- the particularities of modern slavery cases may mean they are excluded from eligibility criteria (eg Commonwealth offences and those involving non-physical forms of violence may be ineligible under the criteria);
- awards are limited to compensation for injuries that occurred in the relevant jurisdictions, meaning that victims and survivors who were trafficked between jurisdictions may need to apply for compensation across multiple schemes, or make a claim based on only one part of their experience;
- victims and survivors may be unable to meet timeframe requirements due to the enduring impacts of trauma and fear, support needs that have not been met, or a lack of awareness of schemes; and
- victims and survivors may be barred from accessing compensation schemes due to disqualifying circumstances, such as being involved in criminal activity, failing to report an offence or failing to provide reasonable assistance to an investigation or prosecution.

Ultimately, it is argued that variation in state and territory schemes impedes victims and survivors of modern slavery from obtaining fair, effective and timely access to justice, and departs from international best practice (Barnes, Naser & Aston 2023; Burn, McLeod & Knackstredt 2016; Simmons, Burn & McLeod 2022). This reflects the uniqueness of modern slavery offences that fall within the Commonwealth's jurisdiction—offences these schemes were not designed to capture (Burn, McLeod & Knackstredt 2016).

Beyond compensation schemes, reparation orders are available under the *Crimes Act 1914* (Cth), but these have rarely been accessed by victims and survivors of modern slavery (Attorney-General's Department 2023). This is primarily attributed to the fact that access depends upon a successful prosecution resulting in a conviction (of which there are few for modern slavery), compounded by a lack of clarity in application and adjudication processes and uncertainty as to outcomes (Burn, McLeod & Knackstredt 2016; Simmons, Burn & McLeod 2022). Further, reparations are discretionary and victims and survivors often lack support in seeking a reparation order (Simmons, Burn & McLeod 2022). Nonetheless, Anti-Slavery Australia and the Law Council of Australia have indicated support for retaining this mechanism to ensure victims and survivors are not limited in their ability to access justice. Similarly, the PJCLE (2017) has recommended that the Australian Government consider ways in which reparation orders can be made more accessible for victims and survivors of modern slavery.

The Australian Government also provides access to civil mechanisms through the Fair Work Ombudsman and the Fair Work Commission, which allow victims and survivors to seek civil and administrative remedies, such as for unpaid wages and entitlements (Office for Women 2025).

Government and non-government stakeholders indicated their concerns that current avenues for remedy are not only ineffective but in breach of Australia's international obligations. Further, they indicated that information about remedy is difficult to find. This was supported by people with lived experience, one of whom explained:

> I definitely needed legal advice … No one told me [about] the victim services payments that I could have gotten. I missed out on [them] because time lapse which [meant] I was no longer eligible … Because I just simply didn't know about them early enough to apply … Those were the sorts of things that would have been really helpful for me to hear. (Lived experience consultation 15)

Noting the limited accessibility of existing schemes through which remedy is currently available, previous inquiries into responses to modern slavery in Australia by parliamentary committees and UN Special Rapporteurs all recommended the establishment of a national compensation scheme (Ezeilo 2012; JSCFADT 2017, 2013; Obokata 2025; PJCLE 2017; see also US Department of State 2025). Compensation schemes are also an example of best practice for child victims of modern slavery and related offences (Singhateh 2022). Researchers and previous inquiries have recommended that this scheme should be:

- eligible to anyone who has experienced modern slavery in Australia (regardless of participation in a criminal investigation or visa status) who can demonstrate, to a reasonable standard of proof, that they have been a victim of a relevant Commonwealth modern slavery offence;
- flexible in determining payment amounts, while also having clearly defined boundaries to limit administrative burdens. To ensure the scheme complements existing state and territory schemes, calculation of payments to be received should consider any compensation received in another jurisdiction; and
- transparent about the process and timeframes of the application and determination process, to allow victims and survivors to make an informed decision (Burn, McLeod & Knackstredt 2016; JSCFADT 2017; OHCHR 2010).

The JSCFADT (2017) has recommended that this scheme could be funded by proceeds of crime and supplemented by Australian Government funds, and modelled on other Commonwealth supported schemes such as the Australian Victims of Overseas Terrorism Payments Scheme and the Defence Abuse Reparation Scheme. Under these schemes, there is no requirement for victims and survivors to prove liability by the Commonwealth, and money received by victims and survivors does not necessarily reduce access to social security benefits.

Summary and conclusion

This report was commissioned by the Office of the Australian Anti-Slavery Commissioner to identify trends, issues and gaps in Australia's criminal justice response to modern slavery, as well as opportunities to strengthen it. Broadly, this report has identified opportunities to improve how victims and survivors access justice and remedy, and the extent to which offenders are held accountable for their crimes. Identified gaps relate to four main areas:

- policing and prosecution of modern slavery;
- victims and survivors' access to and experiences of the criminal justice system;
- support, protection and remedy for victims and survivors; and
- data and research.

Importantly, many of the findings made throughout this report are not new. They have been identified in previous reviews and inquiries by parliamentary committees, international examinations into Australia's modern slavery response (eg by the Special Rapporteur on contemporary forms of slavery, including its causes and consequences (Obokata 2025) and the US *Trafficking in persons* report (US Department of State 2025)), and are often addressed by non-government stakeholders. However, this report builds upon these findings by identifying a need for further and different action to strengthen the criminal justice response to modern slavery in Australia. Specifically, these findings point to a need for a deeper understanding of the barriers faced by victims and survivors as they seek to access justice, and more systemic action to address these barriers and contribute to more tangible outcomes for victims and survivors.

In making the following findings and recommendations, the authors acknowledge the ongoing and important work being undertaken by the Australian Government to strengthen the criminal justice response to modern slavery. The findings and recommendations aim to contribute to and complement these efforts.

Finding 1: Despite improvement in criminal justice responses in recent years, there remain structural and operational barriers to identifying and prosecuting cases.

Recommendation 1: Police, prosecutors and other criminal justice practitioners should critically assess the effectiveness of current systems for identifying and investigating modern slavery to identify areas for improvement. Such improvements may relate to the uptake and efficacy of existing training programs, the accessibility of reporting mechanisms, and communication and collaboration within and between agencies and victim service providers.

Finding 2: While there are measures in place to support victims and survivors to access and navigate the criminal justice system, there remains inconsistency in the extent to which these are being applied. The inconsistent application of victim-centred and trauma-informed processes impacts victims and survivors' ability to access support and justice and recover from the harms caused by their exploitation.

Recommendation 2: Victim-centred and trauma-informed practices should be consistently embedded throughout the investigation and prosecution of modern slavery to ensure that victims and survivors can participate in the process safely and to minimise the risk of retraumatisation. This includes ensuring there is sufficient communication between criminal justice practitioners and victims and survivors, minimising the burden on victims and survivors to contribute to an investigation and prosecution, and providing appropriate legal support for victims and survivors.

Finding 3: Despite ongoing improvements in measures to support victims and survivors' recovery and ongoing protection, victims and survivors are not consistently benefiting from these measures.

Recommendation 3: Efforts to improve criminal justice responses to modern slavery should focus on strengthening support, protection and remedy measures to enhance their accessibility and effectiveness. This includes legislating forced marriage protection orders for adults, legislating a specific defence for victims of modern slavery, introducing a Commonwealth compensation scheme for victims and survivors of modern slavery, and further de-linking support mechanisms from criminal justice participation.

Finding 4: There remain gaps in available research and data on the effectiveness of criminal justice responses to modern slavery (eg challenges and emerging effective practices in policing and prosecution) and on victims and survivors' experiences accessing and navigating the criminal justice system. Improving understanding of these issues would better direct and support changes in policy and practice.

Recommendation 4: Further research and systematic data collection should be funded to explore the effectiveness of criminal justice responses to modern slavery and victims and survivors' experiences accessing and navigating the criminal justice system. Future research and data collection should focus on priority populations including children, victims and survivors with a disability, and First Nations victims and survivors.

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Consultancy report

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