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Consultancy report

Evaluation of the National Action Plan to Combat Modern Slavery 2020–25

Prepared by the Australian Institute of Criminology
for the Attorney-General's Department

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Conflict of interest disclosure

The Australian Institute of Criminology is a member of the Australian Government Interdepartmental Committee on Human Trafficking and Slavery with assigned responsibilities for research activities under the *National Action Plan to Combat Modern Slavery 2020–25* (specifically, action items 40, 41, 42 and 43). As part of this evaluation, like other responsible agencies, the Australian Institute of Criminology self-reported on activities conducted in fulfilment of the goals of the National Action Plan.

Acronyms and abbreviations

ABF	Australian Border Force
AFP	Australian Federal Police
AGD	Australian Attorney-General's Department
AIC	Australian Institute of Criminology
ARP	Additional Referral Pathway to the Support for Trafficked People Program
ASEAN	Association of Southeast Asian Nations
ASEAN-ACT	ASEAN-Australia Counter Trafficking
Bali Process	Bali Process on People Smuggling, Trafficking in Persons and Related Transnational Crime
CDPP	Commonwealth Director of Public Prosecutions
DFAT	Department of Foreign Affairs and Trade
DSS	Department of Social Services
FMSSP	Forced Marriage Specialist Support Program
FWO	Fair Work Ombudsman
Home Affairs	Department of Home Affairs
HTMS	human trafficking and modern slavery
HTVF	Human Trafficking Visa Framework
IDC	Interdepartmental Committee on Human Trafficking and Slavery
ILO	International Labour Organization
LALD Program	Look a Little Deeper Program
MSEAG	Modern Slavery Expert Advisory Group
National Action Plan	<i>National Action Plan to Combat Modern Slavery 2020–25</i>

National Policing Protocol	<i>National Policing Protocol to Combat Modern Slavery</i>
NGO	non-government organisation
NMDS	National Minimum Dataset
National Roundtable	National Roundtable on Human Trafficking and Slavery
OWG	Operational Working Group on Human Trafficking and Slavery
Research Network	Human Trafficking and Modern Slavery Research Network
SAC	Survivor Advisory Council
STPP	Support for Trafficked People Program

Abstract

This is the final report of the Australian Institute of Criminology's evaluation of the Australian Government's *National Action Plan to Combat Modern Slavery 2020–25*. A process and outcome evaluation of the plan was undertaken which drew on administrative data concerning modern slavery reports, government and public source documents, community surveys, and stakeholder and lived experience consultations. The plan represents a substantial advance in Australia's response to modern slavery. Findings show that it was successfully implemented and achieved several positive outcomes including improvements in awareness, understanding of and training in modern slavery; increases in reporting to police and referrals to support services; and the strengthening of partnerships and the evidence base. However, several limitations and areas for improvement are also identified. Eleven recommendations are made for Australia's future strategic response to modern slavery based on these findings.

Executive summary

The Australian Institute of Criminology (AIC) was commissioned to conduct a process and outcome evaluation of the *National Action Plan to Combat Modern Slavery 2020–25* (the National Action Plan; Australian Government 2020). The National Action Plan signals the Australian Government’s commitment to eradicating modern slavery and sets the strategic direction of Australia’s response to these crimes. It comprises 46 action items under five National Strategic Priorities: Prevent; Disrupt, investigate and prosecute; Support and protect; Partner; and Research.

Approach

The evaluation examines information from the AIC’s Human Trafficking and Modern Slavery National Minimum Dataset, two national Community Awareness Surveys, documentation relevant to the completion of activities under the National Action Plan, interviews with 41 government stakeholders involved in the delivery and oversight of the National Action Plan, interviews with 25 civil society stakeholders, and consultations with 15 people with lived experience of modern slavery in Australia. The evaluation commenced in January 2021 and was finalised in May 2026.

Findings

The National Action Plan represents a substantial advance in Australia’s response to modern slavery, establishing a clearer and more specific strategic vision than previous modern slavery plans and strategies. It also introduced a more coordinated and accountable approach by assigning responsibilities for activities to specific Australian Government agencies and laid the groundwork for sustained future efforts beyond its term of operation. It was implemented with a high degree of fidelity, with all action items completed and outputs delivered before the end of the National Action Plan’s term. Governance processes for the plan’s implementation also largely functioned as intended. The successful completion or implementation of such a wide range of initiatives represents a significant success of the National Action Plan. This has also translated into positive outcomes including improvements in awareness, understanding of and training in modern slavery; increases in reporting to police and referrals to support services; and the strengthening of partnerships and the evidence base regarding modern slavery.

Findings also point to several limitations and areas for improvement in future strategic responses to modern slavery. Limited involvement of people with lived experience of modern slavery in the design of the National Action Plan was noted, and this was partially reflected in some of the language and framing used in the plan to represent Australia’s response, as well as a lack of attention to certain high-risk groups and contexts. Additionally, while action items were situated within and clearly connected to strategic priorities, the intersections of these action items with other relevant national plans, and their connection with intended outcomes, were not sufficiently articulated. Action items were not scheduled for delivery in a phased and logical manner, with some action items delivered after others that they could have contributed to or supported, had they been delivered earlier. Drawbacks identified in governance processes included confusion around where lead responsibility sat for some action items, opaque endorsement processes for action items, onerous reporting requirements with no clear purpose, and little sustained effort to raise and maintain awareness of the National Action Plan across government.

Despite full realisation of all action items, some challenges and drawbacks were identified in implementation, limiting the achievement of certain outcomes. Many awareness-raising, training and education initiatives were time-limited or undertaken irregularly, potentially constraining their impact. Results also suggest that future community awareness-raising initiatives should enhance their focus on translating improved awareness into action, namely reporting of modern slavery to authorities. Funding emerged across multiple strategic priorities as another limitation, both in terms of the funding amounts offered and the short-term nature of many funding arrangements. Results point to a need for more engagement with state and territory governments and services, and an appetite for greater engagement with people with lived experience of modern slavery to inform future strategies and initiatives. Finally, certain evidence gaps, particularly those concerning children and First Nations people at risk of or experiencing modern slavery, have not been adequately addressed, and important limitations in data available to understand modern slavery and assess prevention and response efforts persist.

Recommendations

The following recommendations are informed by the findings of the process and outcome evaluations and are intended to support the development of Australia’s future strategic response to modern slavery.

Recommendation 1

The Australian Government should adopt an outcomes-focused approach to Australia’s next strategy, which specifies clearly defined outcomes that are connected to activities and outputs via a theory of change, and measurable indicators to enable evaluation of effectiveness and impact.

Recommendation 2

The Australian Government should ensure the next strategy is informed by people with lived experience of modern slavery using principles of co-design to support the development of strategic priorities, activities and outcomes that reflect their needs and concerns. Where feasible, the Australian Government should also explore opportunities to co-design and co-deliver initiatives with people with lived experience including those beyond direct victim-survivor support activities, such as training of frontline workers. Lived experience engagement should be inclusive of diverse experiences, including differences in individual characteristics, forms of exploitation and support needs. Lived experience engagement should be aligned with policy and program development so people with lived experience can see how their contributions meaningfully inform and shape outcomes, ensuring engagement is purposeful and not undermined by preconceived assumptions.

Recommendation 3

The Australian Government should strengthen collaboration with state and territory governments in the design, governance and delivery of the next strategy to improve coordination and consistent implementation of activities nationally, leveraging existing forums and mechanisms where possible.

Recommendation 4

The Australian Government should adopt a phased and sequenced approach to implementing the next strategy that prioritises enabling initiatives early (eg activities pertaining to governance, partnerships and research) and clearly defines phases for delivery (eg year by year).

Recommendation 5

The Australian Government should consider how the framing and language used to describe modern slavery in the next strategy communicates the Australian Government's understanding of the issue to both domestic and international audiences. Specifically, framing should align with the objectives of the next strategy, avoid adversarial language, reflect the intersectional nature of modern slavery and the diversity of affected individuals and experiences, and promote a victim-centred and rights-based approach.

Recommendation 6

The Australian Government should clearly define agency roles and responsibilities in the next strategy, including by attributing lead responsibility for activities, to support effective coordination, accountability and delivery. The Australian Government should also promote and maintain awareness of the next strategy among key stakeholders, particularly staff within agencies responsible for its delivery.

Recommendation 7

The Australian Government should ensure that national awareness-raising initiatives are sustained over time and incorporate knowledge translation mechanisms that support the conversion of awareness into practical action within the community.

Recommendation 8

The Australian Government should ensure that the next strategy strengthens the integration of trauma-informed and victim-centred principles into identification, investigation, prosecution and support mechanisms, to reduce the risk of retraumatisation or further harm and to improve access to support.

Recommendation 9

The Australian Government should ensure projects are sufficiently funded to support the effective delivery of their intended outcomes.

Recommendation 10

The Australian Government should enhance the evidence base underpinning policy and practice responses to modern slavery, for example by establishing a research agenda in collaboration with researchers and other experts that identifies knowledge gaps, priority research topics and opportunities for improved data collection.

Recommendation 11

The Australian Government should strengthen accountability and oversight mechanisms in the delivery of the next strategy through, for example, the Australian Anti-Slavery Commissioner or the National Roundtable on Human Trafficking and Slavery, as well as ongoing monitoring and evaluation. Monitoring and evaluation should be supported by a framework developed concurrently to the next strategy so that intended outcomes, outcome measures and data requirements are defined from the outset.

Introduction

Modern slavery refers to all human trafficking, slavery and slavery-like practices criminalised in Divisions 270 and 271 of the *Criminal Code Act 1995* (Cth). These offences encompass a range of serious exploitative practices including trafficking in persons, slavery, servitude, forced labour, deceptive recruiting for labour or services, debt bondage, and forced marriage. Modern slavery is also used to describe the worst forms of child labour, including the commercial sexual exploitation of children and the exploitation of children for illegal activities such as drug trafficking.

The AIC estimates that up to 1,900 people were living in conditions of modern slavery in Australia across 2015–16 and 2016–17. Further, most people who have experienced modern slavery are unknown to authorities and support services, with an estimated 70 to 80 percent of victims going undetected (a ratio of four undetected victims for every victim detected; Lyneham, Dowling and Bricknell 2019). These figures are conservative, with estimates of the number of victims living in conditions of modern slavery in Australia in 2021 reaching as high as 41,000 (Walk Free Foundation 2023).

The Australian Government launched a five-year national action plan on 9 December 2020 in recognition that modern slavery is a serious and unreported issue that warrants government attention and action. The *National Action Plan to Combat Modern Slavery 2020–25* (Australian Government 2020) builds upon strategies implemented as part of the previous *National Action Plan to Combat Human Trafficking and Slavery 2015–19* (Australian Government 2014). The National Action Plan defines modern slavery as encompassing all human trafficking, slavery and slavery-like offences that are criminalised and defined in Divisions 270 and 271 of the *Criminal Code Act 1995* (Cth).

The National Action Plan provides the strategic framework for Australia's response to modern slavery through five National Strategic Priorities that focus government efforts towards prevention; disruption, investigation and prosecution; support and protection; partnerships; and research (see Box 1). To achieve the goals of each strategic priority, the National Action Plan committed relevant Australian Government agencies to delivering a total of 46 action items. Each action item was assigned to one or more responsible Australian Government entities that were accountable for its planning, implementation and delivery, and reporting requirements.

Box 1: National Strategic Priorities of the National Action Plan to Combat Modern Slavery 2020–25

1. **Prevent** modern slavery by combating the drivers of these crimes and empowering individuals and groups that are vulnerable to modern slavery.
2. **Disrupt, investigate and prosecute** modern slavery by identifying victims and survivors, implementing disruption strategies and holding perpetrators to account through effective investigations and prosecutions.
3. **Support and protect** victims and survivors by providing holistic and tailored victim-centred support and protection.
4. **Partner** across government and with international partners, civil society, business, unions and academia to ensure a coordinated response to modern slavery.
5. **Research** by strengthening data collection and analysis to build the evidence base that supports our response to modern slavery.

The National Action Plan was informed by written submissions and consultations conducted with representatives from civil society groups, peak bodies, businesses, unions, academics, service providers, anti-slavery networks and international organisations. The development of the National Action Plan was also informed by findings from the AIC's *Review of the National Action Plan to Combat Human Trafficking and Slavery 2015–19* (Lyneham & Voce 2020). The purpose of the AIC's review was to document the activities undertaken to achieve the goals of the previous National Action Plan. In addition to several other recommendations, the AIC's review identified the need for future National Action Plans to be evaluated to assess the delivery and impact of strategies to prevent and reduce modern slavery in Australia.

Through implementing the National Action Plan, the Australian Government aspired to achieve the following outcomes:

- Victims, survivors and their families and communities are supported.
- Victims and survivors are empowered to rebuild their lives.
- The rights of victims and survivors, particularly women and girls, are protected and promoted.
- Justice responses are effective and perpetrators are held to account.
- Vulnerable communities and individuals are safer and protected from modern slavery.
- Australia is an international and regional leader driving collaborative responses to modern slavery.
- Australia makes a significant contribution to the understanding of the drivers of modern slavery, and effective responses to these crimes (Australian Government 2020).

In addition, there were nine principles that guided the overall implementation of the National Action Plan:

1. Australia responds to modern slavery in a manner that is comprehensive, effective, timely, coordinated and consistent with our international obligations.
2. Australia addresses the unique needs of women and children, who are disproportionately affected by modern slavery.
3. Australia maintains a strong deterrence framework which promotes investigations, prosecutions and the enforcement of civil sanctions, and penalises offenders to the full extent of the law.
4. Australia provides holistic, gender-sensitive, culturally-responsive, trauma-informed, victim-centred protection and support to all victims and survivors of modern slavery.
5. Australia affords victims and survivors of modern slavery access to effective remedies.
6. Australia promotes a collaborative response that is built on the participation of victims and survivors of modern slavery, government, civil society, business, unions, academia and the broader community working in partnership to prevent and combat modern slavery.
7. Australia strives to be an international and regional leader and partner in deterring and combating modern slavery, and works cooperatively with other governments both internationally and regionally towards this end.
8. Australia promotes an evidence-based response to modern slavery, and its root causes and drivers, to build our understanding of modern slavery and how to prevent it.
9. Australia ensures the voices of victims and survivors, particularly women and children, inform our responses to modern slavery.

Terminology

This report uses a range of terms to describe an individual who has experienced, is experiencing or is at risk of modern slavery, such as person/people with lived experience, victim-survivor, and victim. The specific term used depends on the context in which an individual's experience is being discussed. For example, an individual is often referred to as a victim in the context of criminal justice processes, but is referred to as a person with lived experience when sharing their own views and experiences. We acknowledge that the language of modern slavery is not universally accepted, and that some people with lived experience reject the terms 'victim' and 'victim-survivor' due to connotations that evoke pity, sympathy and disempowerment.

Evaluation of the National Action Plan

Background and approach

The evaluation of the National Action Plan is underpinned by a Monitoring and Evaluation Framework. In March 2020, the AIC was commissioned by the Australian Border Force (ABF) and subsequently the Attorney-General's Department (AGD) following machinery-of-government changes in 2022 to develop this framework and evaluate the National Action Plan. The evaluation framework was informed by a review of consultation transcripts and written submissions received by the ABF as part of the development of the National Action Plan. The AIC then independently interviewed individuals and organisations who participated in the ABF consultations, as well as additional individuals and organisations who had not. Five expert advisory groups were formed from the 65 individuals consulted. Each expert advisory group comprised four to six specialist contributors in specific areas (see Figure 1).

Figure 1: Process for developing the National Action Plan evaluation framework



As part of the Monitoring and Evaluation Framework, the AIC developed five logic models, one for each National Strategic Priority (see Figures 4, 6, 8, 10 and 12). These specify the outputs and outcomes that were expected to be achieved with the successful implementation of all action items. Outputs refer to what was produced or delivered over the life of the National Action Plan, and outcomes refer to changes that were (or are) expected to be realised because of this work. Table 1 summarises the links between outputs and short-, medium- and longer-term outcomes.

Importantly, the National Strategic Priorities are not mutually exclusive. For example, action items under National Strategic Priorities 4 (Partner) and 5 (Research), in principle at least, enable greater success in the delivery and outcomes of action items under National Strategic Priorities 1 (Prevent), 2 (Disrupt, investigate and prosecute) and 3 (Support and protect). As such, the logic models should be read together.

The evaluation encompasses process and outcome components. The process evaluation examines the extent to which action items encompassed within the National Action Plan were implemented as intended, and outputs were achieved. The outcome evaluation examines the extent to which the intended outcomes of the National Action Plan (as described in the logic models) were achieved. It is important to note that, because they are sequential, shorter-term outcomes were more likely to have been observable than medium- and long-term outcomes during the life of the National Action Plan. The evaluation commenced in January 2021 and was finalised in May 2026. Key data sources and collection activities used to undertake the evaluation are described below.

Table 1: Overall program logic for the National Action Plan to Combat Modern Slavery 2020–25

Outputs	Short-term outcomes	Medium-term outcomes	Long-term outcomes
National Strategic Priority 1: Prevent			
• Ratification of international protocols to prevent modern slavery progresses, and ratified protocols (and endorsed guidelines and principles) are promoted; • individuals, groups, communities and organisations participate in/are exposed to education and training programs and use tools and resources; • communities and groups at risk of modern slavery are identified; and • initiatives to identify and address modern slavery risks in Government procurement and investments are progressed.	• Awareness of modern slavery increases among the general public, business, civil society and the community, including in high-risk communities; • understanding of the root causes of modern slavery, and awareness of rights and protections under Australian law, increases in at-risk communities; and • the capacity of civil society and business to identify and interrogate modern slavery risks in Australian supply chains increases.	• The capacity of consumers to identify modern slavery risks associated with consumer goods increases; • community collaboration with government agencies and civil society to address practices or beliefs that lead to or support modern slavery increases; and • the willingness of business operators to address modern slavery risks increases.	Vulnerable communities and individuals in Australia are safer and protected from modern slavery crimes. The rights of victims and survivors, particularly women and girls, are protected and promoted.

Table 1: Overall program logic for the National Action Plan to Combat Modern Slavery 2020–25 (cont.)

Outputs	Short-term outcomes	Medium-term outcomes	Long-term outcomes
National Strategic Priority 2: Disrupt, investigate and prosecute			
• Training resources and tools are developed and disseminated; • frontline responders participate in and complete education and training programs (both in Australia and overseas); • the National Policing Protocol to Combat Modern Slavery is implemented; • modern slavery cases are reported, investigated and prosecuted, where appropriate; and • the Australian Visa Framework and Divisions 270 and 271 of the <i>Criminal Code Act 1995</i> (Cth) are reviewed and findings are communicated.	• Knowledge and skills of federal and state/territory police to investigate suspected modern slavery cases and have positive engagement with victim-survivors increases; • knowledge and skills of the CDPP to prosecute modern slavery cases effectively increases; • confidence among first responders to identify and refer suspected cases of modern slavery increases; and • the Australian Visa Framework and Divisions 270 and 271 of the <i>Criminal Code Act 1995</i> are amended in accordance with the findings from the reviews.	• Knowledge and skills of federal and state/territory police to investigate suspected modern slavery cases and have positive engagement with victim-survivors increases; • knowledge and skills of the CDPP to prosecute modern slavery cases effectively increases; • confidence among first responders to identify and refer suspected cases of modern slavery increases; • the Australian Visa Framework and Divisions 270 and 271 of the <i>Criminal Code Act 1995</i> are amended in accordance with the findings from the reviews; • the number of appropriate reports received by the AFP increases; • victim-survivor satisfaction with and understanding of criminal justice processes increases; • the quality of evidence collected by AFP and ABF officers about suspected modern slavery cases increases; and • the number and quality of briefs of evidence for modern slavery cases received by the CDPP increase.	Justice responses are effective and perpetrators are held to account.

Table 1: Overall program logic for the National Action Plan to Combat Modern Slavery 2020–25 (cont.)

Outputs	Short-term outcomes	Medium-term outcomes	Long-term outcomes
National Strategic Priority 3: Support and protect			
- Victim-survivors of modern slavery are: identified, referred to and engaged in support services; provided support via programs and interventions; and helped to transition out of support services; - services are provided with practical supports to meet the needs of victim-survivors; - businesses are supported and provided with guidance to improve pathways to effective remedies for victim-survivors; and - victim-survivor support options and remedies are reviewed and findings communicated.	- Victim-survivor understanding of their rights and support options increases; - the health and wellbeing of victim-survivors improves; - the capacity and capability of services and businesses to respond to the needs of victim-survivors increase; and - victim-survivor support options and remedies are improved as needed in accordance with the findings of the targeted review of support and legislative protections, defences and remedies available to modern slavery victims and survivors, particularly women and children.	- Victim-survivor willingness and capacity to participate in criminal justice processes increases; - victim-survivor satisfaction with the support received increases; - victim-survivors have greater access to civil and financial reparation; and - the number of appropriate referrals to support services increases.	Victims, survivors and their families and communities are supported. Victims and survivors are empowered to rebuild their lives.

Table 1: Overall program logic for the National Action Plan to Combat Modern Slavery 2020–25 (cont.)

Outputs	Short-term outcomes	Medium-term outcomes	Long-term outcomes
National Strategic Priority 4: Partner			
- Relationships between key stakeholders and forums are developed and maintained; - information is shared between stakeholders; - stakeholder engagement and information-sharing strategies and protocols are reviewed and/or developed and disseminated, including the Victim and Survivor Engagement and Empowerment Strategy; - civil society organisations are funded to deliver programs in collaboration with government agencies; and - the Australian Government funds and delivers programs to prevent and respond to modern slavery domestically and overseas.	- Government recognition of stakeholders' role in preventing and responding to modern slavery and stakeholder collaboration increases; and - stakeholder collaboration and coordination in the prevention, identification, investigation, remediation, prosecution and case management/ support of modern slavery victim-survivors increase.	- The extent to which responses and frameworks to address modern slavery are complementary across all levels of government increases; - stakeholder contributions increase and are reflected in policy design and implementation; - the inclusion of victim-survivor and community 'voice' in policy design and implementation increases; and - understanding of the support needs of victim-survivors and at-risk communities increases among government, law enforcement, business and civil society organisations.	Australia is an international and regional leader driving collaborative responses to modern slavery, including human trafficking.

Table 1: Overall program logic for the National Action Plan to Combat Modern Slavery 2020–25 (cont.)

Outputs	Short-term outcomes	Medium-term outcomes	Long-term outcomes
National Strategic Priority 5: Research			
- Data collection and linkage protocols to support research and evaluation are developed and implemented; - a modern slavery research network is established and new and emerging research findings are communicated; - research and evaluation projects are funded and delivered, and findings are communicated to government and civil society; - the <i>Modern Slavery Act 2018</i> is reviewed and findings are communicated; and - statements submitted under the <i>Modern Slavery Act 2018</i> are made publicly available.	- The capacity of government and civil society organisations to collect and share information about modern slavery increases; - the availability and quality of data that can be used to measure the prevalence and characteristics of modern slavery, and to evaluate the effectiveness of responses in Australia, increases; and - the <i>Modern Slavery Act 2018</i> itself and/or its implementation/delivery is amended as appropriate in accordance with the findings from the review.	- Policies, programs, initiatives and interventions are adapted to reflect research findings and recommendations arising from reviews and evaluations; - the evidence base regarding the nature and prevalence of modern slavery in Australia, including modern slavery risks in supply chains, improves; and - the effectiveness of programs in achieving their stated goals increases.	Australia makes a significant contribution to the understanding of the drivers of modern slavery and effectiveness of responses to these crimes.

Note: AFP=Australian Federal Police. ABF=Australian Border Force. CDPP=Commonwealth Director of Public Prosecutions. The National Strategic Priorities and long-term outcomes are outlined in the National Action Plan. Outputs and short- and medium-term outcomes were developed by the AIC as part of its Monitoring and Evaluation Framework.

Data sources

Human Trafficking and Modern Slavery National Minimum Dataset

The AIC's Human Trafficking and Modern Slavery (HTMS) National Minimum Dataset (NMDS) is an administrative dataset on the nature and outcomes of reports of modern slavery in Australia, and the characteristics of suspected victim-survivors and perpetrators. It collects data on:

- reports of alleged modern slavery made to the Australian Federal Police (AFP) and subsequent investigations;
- suspected victim-survivors and perpetrators of modern slavery identified by the AFP;
- victim-survivors referred to Australian Government funded support programs for victim-survivors and the supports they received, including under the Support for Trafficked People Program (STPP) and Forced Marriage Specialist Support Program (FMSSP);
- victim-survivors granted a visa under the Human Trafficking Visa Framework (HTVF); and
- modern slavery matters referred to or continued by the Commonwealth Director of Public Prosecutions (CDPP).

Data are provided according to a codebook developed for the NMDS by four Australian Government agencies:

- AFP;
- Department of Social Services (DSS), which administers the STPP and FMSSP;
- Department of Home Affairs (Home Affairs), which administers the HTVF; and
- CDPP.

Further data are provided by the Australian Red Cross and Life Without Barriers, who are responsible for delivering the STPP and FMSSP, respectively. This includes information on victim-survivors who have been referred to these programs by the Additional Referral Pathway (ARP), which is delivered by the Salvation Army and Anti-Slavery Australia. These data are provided to the NMDS with the informed consent of clients.

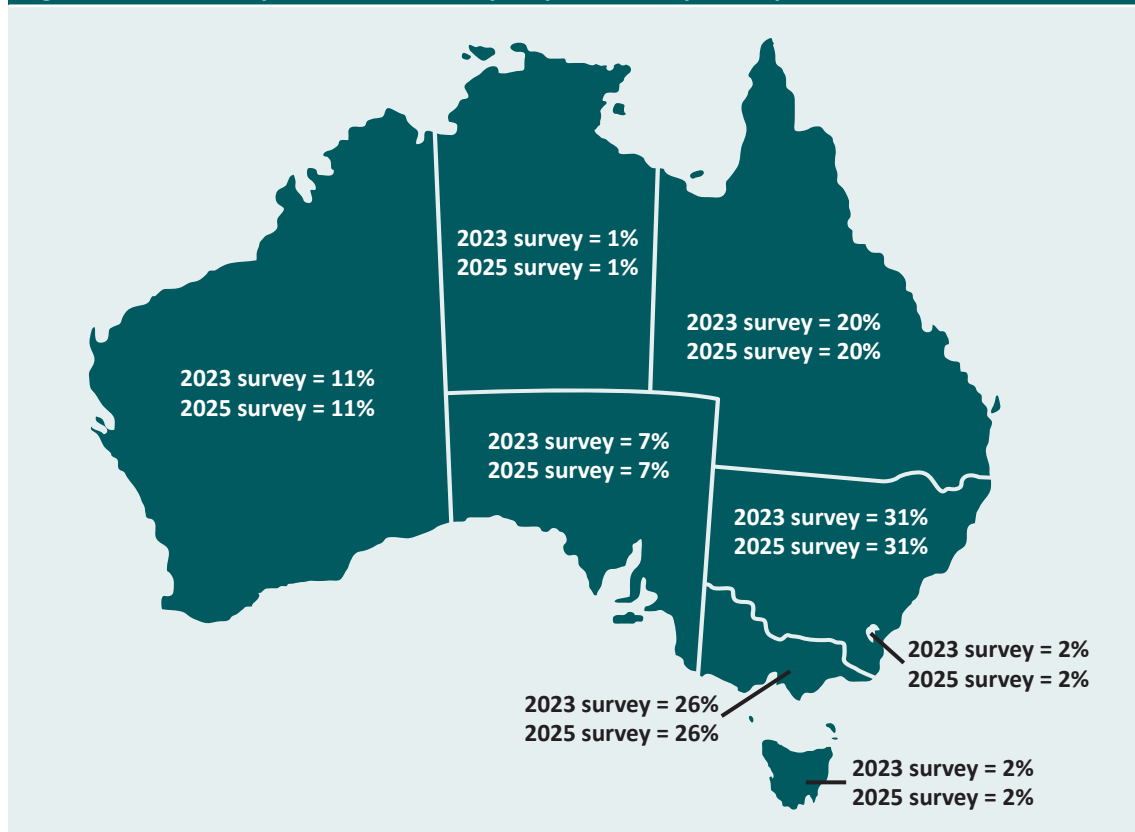
The NMDS was piloted in 2023 (Gannoni & Bricknell 2024) and subsequently became an ongoing statistical monitoring program within the AIC. The NMDS provides high-level information about the nature and characteristics of HTMS in Australia, as well as facilitating the analysis of trends over time. At the time of writing, it includes data on 124 suspected HTMS-related events involving 117 perpetrators and 155 victim-survivors recorded between 1 July 2022 and 30 June 2023 (McDonald & Bricknell 2025), and 132 suspected HTMS-related events involving 88 perpetrators and 128 victims recorded between 1 July 2024 and 30 June 2025 (Bricknell & McDonald 2025).

Community Awareness Survey

The AIC administered two national online surveys of Australian residents aged 18 years and over. These surveys asked respondents about their awareness of, and attitudes towards, modern slavery and related prevention and response efforts. The first survey was administered between 17 May and 19 June 2023, and the second was administered between 30 April and 27 May 2025. Proportional quota-based sampling was used across both surveys to recruit respondents who were representative of the spread of the Australian adult population, stratified by usual place of residence, gender and age, according to data from the Australian Bureau of Statistics.

Survey responses were screened and cleaned to remove nonsensical and poor-quality responses. Due to under- and over-sampling of some respondent groups, data were weighted to more accurately represent the Australian adult population. The final weighted sample from the first survey was 5,006 respondents, and the final weighted sample from the second survey was 4,942 respondents. The sample is described in Figure 2 and Table 2.

Figure 2: Community Awareness Survey respondents by usual place of residence



Note: 2023 survey $n=5,006$; 2025 survey $n=4,942$

Source: AIC Community Awareness of and Attitudes Towards Modern Slavery in Australia Survey 2023 and 2025 [computer file] [weighted data]

Table 2: Demographic characteristics of Community Awareness Survey respondents				
	2023 survey n=5,006		2025 survey n=4,942	
	n	%	n	%
Gender				
Man	2,376	47	2,280	46
Woman	2,585	52	2,638	53
Gender diverse	45	1	25	1
Age (years)				
18–24	562	11	572	12
25–34	930	19	932	19
35–44	885	18	885	18
45–54	802	16	765	15
55–64	741	15	705	14
65 and over	1,086	22	1,084	22
Language spoken most often at home^a				
English	4,584	92	4,491	91
Other	398	8	440	9
Country of birth^b				
Australia	3,859	77	3,772	76
Overseas	1,105	22	1,139	23
CALD^c	1,137	23	1,195	24

a: Denominator includes 23 respondents who did not provide this information in 2023 and 11 respondents who did not provide this information in 2025

b: Denominator includes 42 respondents who did not provide this information in 2023 and 31 respondents who did not provide this information in 2025

c: Refers to culturally and/or linguistically diverse respondents. This includes respondents who were of a non-English-speaking background, who were born overseas and/or who had one or more parents born overseas

Note: Weighted frequencies and percentages may not add to total due to rounding and missing data

Source: AIC Community Awareness of and Attitudes Towards Modern Slavery in Australia Survey 2023 and 2025 [computer file] [weighted data]

Document review

Relevant documents were sought from Australian Government entities involved in the delivery of the National Action Plan. This documentation principally consists of action item completion reports submitted to the ABF, and later the AGD, for provision to the Interdepartmental Committee on Human Trafficking and Slavery (IDC) for consideration and endorsement. These reports were provided to the AIC for the purposes of the evaluation. Public source information relating to the delivery of action items (eg websites, public reports, and the National Action Plan itself) and other unpublished documentation (eg internal reviews and evaluations) were also sourced by the AIC for examination. All together, 245 documents were reviewed. The document review was used primarily to examine the nature of the National Action Plan's implementation and the degree to which activities were implemented as intended, and explore challenges and shortcomings in implementation. To the extent possible, outcomes were also assessed with reference to these documents.

Stakeholder consultations

Forty-three interviews were undertaken with 66 stakeholders involved in the delivery and management of the National Action Plan, and in addressing modern slavery in Australia more broadly. This included 25 interviews with 41 government stakeholders and 18 interviews with 25 non-government stakeholders. Government stakeholders held roles related to policy and program development, delivery and administration; law enforcement and regulation; research, data collection and analysis; and awareness raising. Non-government stakeholders included representatives from civil society organisations, businesses, academia, and lived experience experts. Participants were approached via email to take part in an individual or group semi-structured interview of one to two hours via Microsoft Teams with members of the AIC research team. Consultations sought stakeholder views on:

- the design, structure and governance of the National Action Plan;
- the successes, shortcomings and difficulties of implementing activities under the National Action Plan;
- the extent to which they thought the National Action Plan was being implemented as intended;
- whether National Action Plan activities were achieving desired outcomes and meeting the needs of intended beneficiaries; and
- strategies for improving the effectiveness of the National Action Plan.

Interviews were undertaken between August 2024 and October 2025. With participants' permission, transcripts and written notes were generated for the purpose of analysis. Transcripts were subsequently destroyed. Transcripts and notes were assigned numerical identifiers to anonymise participants and ensure confidentiality. Numerical identifiers were used to attribute quotes to individuals who participated in single as well as group interviews. Therefore, while each quote is from an individual person, the numerical identifier corresponds to the interview they participated in. All records of contact with stakeholders regarding these consultations (eg emails, contact directories) were also destroyed at the conclusion of the evaluation.

Lived experience engagement

Consultations were undertaken with 15 people with lived experience of modern slavery. Persons aged 18 years and over whose experience had relevance to Australia were invited to participate in the evaluation through a mixed public and targeted recruitment process involving posts to AIC social media pages and targeted emails to peak bodies and organisations. Consultations with individuals focused on the effect of National Action Plan activities on:

- their understanding and awareness of support and criminal justice response mechanisms, and their rights in relation to these;
- their satisfaction with these mechanisms and willingness to engage with them; and
- their health and wellbeing.

Individuals who agreed to take part were invited to complete either an online survey, a written submission or an online interview with members of the AIC research team. Each of these options is described further below. Multiple ways to contribute were offered to ensure that individuals who wanted to participate were able to do so in a way that suited them and allowed them to best express their views. Participants could remain anonymous (except for interviews, see below), and any information provided that could be used to identify respondents was removed before storage. After agreeing to participate, but before nominating a preferred method of contribution, respondents were first asked a series of questions to determine their eligibility to participate (ie their age and whether they had experienced modern slavery in Australia) as well as a series of demographic questions. Consultation materials were developed by the AIC research team and refined based on the feedback of seven people with lived experience of modern slavery in Australia before going into the field. All three options were hosted through Survey Manager. Given the focus of these consultations was on outcomes of the National Action Plan, they were held towards the end of the term of the National Action Plan and immediately after, from October 2025 to March 2026. Four respondents completed the online survey and 12 respondents participated in an interview. No written submissions were received.

Online survey

The online survey asked a series of closed and open-ended questions about respondents' own experiences of and views on criminal justice processes and support mechanisms in relation to modern slavery.

Written submissions

Written submissions allowed respondents to outline their experiences and views of criminal justice processes and support mechanisms in relation to modern slavery in a less structured and more tailored way. While respondents were free to write what they wished, a set of high-level questions aligned with those in the online survey were provided to guide their response and prompt the provision of information required for the evaluation.

Interviews

Individual and group interviews were conducted via Microsoft Teams at a time convenient for respondents. Interviews ran for one to two hours and asked a set of high-level questions about respondents' experiences and views of criminal justice processes and support mechanisms in relation to modern slavery. These questions were identical to those asked as part of the written submission and aligned with those asked in the survey. In choosing this option, respondents were required to provide either an email address or phone number at which they could be contacted by an AIC researcher to schedule the interview. As with stakeholder interviews, permission was sought to generate transcripts and written notes for the purpose of analysis. Transcripts and notes were similarly assigned numerical identifiers to anonymise participants and ensure confidentiality. Numerical identifiers were used to attribute quotes to individuals who participated in single as well as group interviews. Therefore, while each quote is from an individual person, the numerical identifier corresponds to the interview they participated in. Contact details and interview transcripts and notes were destroyed at the conclusion of the evaluation.

Limitations

The AIC intended to assess training initiatives delivered under the National Action Plan with an online survey distributed to police and other government officials. This survey was designed to examine the delivery, informativeness and perceived utility of training in understanding, recognising, preventing and responding to modern slavery delivered by Australian Government agencies under the National Action Plan broadly, without a focus on any single initiative. The survey was designed in collaboration with the AGD and was distributed to key government stakeholders in October 2024, with the support of the AGD. Due to a low response rate across government, this survey could not be used. This low response rate was likely due to fatigue among potential respondents, who were already expected to complete one or more training programs and were often asked to complete program-specific surveys immediately after training. There were also difficulties distributing the survey to relevant individuals, who spanned across multiple Australian Government entities. Limitations in the extent to which training initiatives specifically can be assessed in this evaluation are therefore acknowledged. It is noted that an evaluation of the Look a Little Deeper Program (LALD)—one of the largest training initiatives under the National Action Plan, delivered by the AFP to officers across Australia—is ongoing at the time of writing. It is also noted that evaluations of training initiatives delivered under the Modern Slavery Grants Program have been undertaken, which are discussed as part of this evaluation.

Given the timeframes of data collection activities for this evaluation and completion of the final report soon after the end of the National Action Plan's term, this evaluation has a stronger focus on implementation than outcomes. Additionally, several of the specified outcomes, particularly longer-term outcomes, are unable to be examined. This is for several reasons, including:

- Undertaking data collection during the term of the National Action Plan, and completing this evaluation soon after the end of the National Action Plan's term, leaves little time for many outcomes to have occurred. Many of the changes expected to result from the National Action Plan, even shorter-term changes, will be incremental and will take time to emerge.
- Many action items were only fully implemented in the final 12 months of the National Action Plan (see Figures 3, 5, 7, 9, 11 and 13), further limiting the time available for outcomes to be observed.
- To achieve longer-term outcomes in particular, several shorter-term outcomes must be achieved first.
- Understanding the implementation and operation of the National Action Plan will be important for understanding why the National Action Plan has or has not achieved certain (particularly longer-term) outcomes.

Finally, while the proportional quota-based sampling method for the Community Awareness Survey ensured that the sample was representative of the spread of the Australian population in terms of age, gender and usual place of residence, it is unknown how representative the sample is of the broader adult Australian population in terms of other factors. Some care should therefore be exercised in generalising these results to the wider population. Additionally, analyses were limited to differences in awareness of modern slavery by gender, age and cultural and linguistic diversity. As such, there may be other factors associated with awareness of modern slavery that were not identified.

Evaluation findings

Development of the National Action Plan

Through the National Action Plan, the Australian Government made a significant investment in strengthening its response to modern slavery. It built on the foundations of the plan preceding it by articulating clear principles that define the vision for future government action and align with international best practice under the 4Ps framework of the *United Nations Global Plan of Action to Combat Trafficking in Persons* (protection, prevention, prosecution and partnership; International Organization for Migration 2026; United Nations General Assembly 2010).

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The way it's structured is to align with the 4Ps—the international good practices for how we should combat modern slavery. Because of the way the action items are grouped that way, I can see how we can work on implementing action items within the priorities together. Makes sense to me to see it that way. (Consultation 9, Government: Policy and Programs)

This vision was supported by a substantial number of action items designed to enhance the response across the five National Strategic Priorities. It also brought together key government stakeholders and assigned responsibility for delivering specific actions, representing a more coordinated approach than had previously been undertaken. Identifying agencies responsible for each action item signalled an upfront commitment to transparency and accountability in its implementation.

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One of the things the National Action Plan does do really effectively is focus the minds of the relevant departments on the fact that they do actually have to deliver what's in the plan. And so you have really seen, I think, a focus on ensuring that those commitments are met, which is positive. (Consultation 15, Government: Other)

It is a visionary thing to put a strategy together and it is visionary to commit your agencies across the broad spectrum of the government and the Australian Government response to consider how they could be leaders in combating modern slavery in the region. So I think it was a really significant thing to do and I think it was significant to name agencies responsible for each item and to focus people's efforts on moving the dial on really significant issues. (Consultation 35, Civil Society)

The context and challenges, such as key drivers of modern slavery, were also articulated in this National Action Plan, which demonstrated a greater understanding of the problem than previous iterations. Importantly, the National Action Plan established a strategic framework and infrastructure for future action beyond its term, even if outcomes may not have been realised or observed within its specific timeframe. The extent and breadth of consultation within and outside of government to inform its development also contributed to its robustness compared to its predecessor.

However, several deficiencies were identified in relation to how the National Action Plan was developed. Language and framing are important indicators of how governments understand, represent and respond to a problem. One critique of the National Action Plan is its use of adversarial language (eg 'combat'), which promotes a focus on criminal justice and enforcement approaches in a way that is not victim-centred and disempowers people with lived experience.

While the National Action Plan reflects a stronger appreciation of the intersection between modern slavery and gender, and its links to related forms of offending (eg labour exploitation and wage theft), it does not identify the individuals and communities most likely to experience modern slavery, such as migrant workers, persons living with disability, First Nations people, children and young people, LGBTQIA+ people, and people experiencing homelessness or insecure housing. The role of ethical consumerism in reducing modern slavery within supply chains also lacked proper attention. Further, the evaluation revealed concern about modern slavery occurring within high-control groups (ie religious, political and social cults and organised fringe groups; see Legislative Assembly Legal and Social Issues Committee 2025). These groups may use coercive and manipulative practices to deceptively recruit, control and exploit individuals, but this has not yet been acknowledged at a national level.

In part, these gaps reflect the limited involvement of people with lived experience in the design of the National Action Plan. Incorporating lived experience perspectives in the development of the next national strategic response, particularly through principles of co-design (see AGD 2024), could strengthen understanding of modern slavery drivers and contexts, and the varied experiences and needs of those at risk, to ensure a more targeted response.

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I really think that the lack of survivor voice, the lack of survivor validation from point go about a theory of change—‘if we do this, we will achieve that’—you have to check that. You have to test the assumptions that you’re making with survivors because they’ll tell you, ‘Well, actually, if you do that it won’t work because there’s all these things that you have no way of knowing because you’re not in my shoes’... We’re basing survivor engagement on a consultation model as opposed to a co-design model. We need to be looking at how to improve survivor participation in setting the agenda. (Consultation 14, Government: Other)

There’s one sentence [in the National Action Plan] to say ‘voices were incorporated’ but never said how ... It can’t be tokenistic. We can’t present them with a developed plan and then ask for feedback. We also need to engage people with a broad range of experiences. Not just lived experience of labour exploitation, for example. Variation in gender, citizenship, experiences and so on. One voice doesn’t speak for all voices. (Consultation 9, Government: Policy and Programs)

Although the National Action Plan referenced other relevant national plans and frameworks (eg *National Plan to Reduce Violence against Women and their Children 2010–2022*) and important international instruments (ie relevant international laws, Sustainable Development Goals and UN Guiding Principles on Business and Human Rights), it provided limited consideration of how it could align with these through its action items. This limited the identification of potential synergies, collaborative activity or joint effort across related areas, such as family and domestic violence, child protection, migrant worker exploitation, and state and territory policing and justice.

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Modern slavery doesn't happen in isolation. It happens in communities and it can often present as something completely different. So, by looking at it through that context ... we missed the opportunity to bring in all those other groups and coordinate at scale ... It might look like family and domestic violence; it might happen in conjunction with family and domestic violence. Generally, there are mental health issues. How do we bring those sectors in? We haven't always leveraged the opportunity to learn from and work with those sectors. (Consultation 33, Civil Society)

A significant criticism of the National Action Plan is its emphasis on the delivery of outputs, with limited articulation of how action items were expected to contribute to the outcomes. This made it difficult to assess the National Action Plan's underlying impact and contributed to a largely process-driven approach.

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There's a lot of outputs that can't be accounted for by an outcome. (Consultation 26, Academia and Research)

We always talk about the importance of being able to see the impact that something is having on the community or whoever we expect to see the impacts, and there's space for that to be considered in the development process alongside how it's going to be evaluated. If we can understand more clearly what we're trying to get out of the National Action Plan at the end, particularly objective and aims, more effectively, to then better evaluate and analyse impacts, then we'd be able to have a clearer impact, clearer understanding of gaps, greater ability to fill those gaps in future. Tying to evaluation in development phase would be more effective in understanding how to get from A to Z. (Consultation 10, Government: Policy and Programs)

The absence of a clearly articulated outcomes framework and theory of change linking activities, outputs and outcomes further constrained the ability to assess how activities and outputs contributed to meaningful progress. This was compounded by limited consideration of appropriate outcome measures and the data that would be required to demonstrate and monitor impact, particularly positive impacts for victims and survivors.

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The plan is incredibly process-based, and it's difficult if not impossible to evaluate for impact. (Consultation 14, Government: Other)

The theory of change really could be strengthened because while I understand that there's a practical necessity to have measurable actions that will then lead to the type of impact that we want to see, I'm not sure that all of these deliverables have been thought through with that measure in mind ... [The National Action Plan's] been really important in terms of highlighting the strategic priority areas. But I think the weakness is that it focuses on those immediate deliverables, but not that next step of have they actually delivered impact? (Consultation 15, Government: Other)

We need more mechanisms and to think more clearly about data collection at the beginning of the National Action Plan. How are we going to measure success? What data do we need to collect for that? (Consultation 19, Government: Policy and Programs)

It seems like the NAP [National Action Plan] does not focus right now on the actual outcomes for victim-survivors, more on the outcomes that the sector sees. And I've been wondering ... how the government has been actually measuring its success over the past five years, from the point of view of victim-survivors. (Consultation 44, Person with lived experience)

The National Action Plan also did not sequence or link activities in a phased and logical manner to maximise collective impact and timely delivery of action items. For example, activities to establish effective partnerships (eg action item 30) should precede activities that rely on those partnerships (eg action item 23) to be implemented successfully. Indeed, as Figure 3 below shows, many of the action items under National Strategic Priorities 4 (Partner) and 5 (Research), which focus primarily on enabling better responses to modern slavery, were completed in the final two years of the National Action Plan's term. This is concurrent to the completion of many of the action items under other National Strategic Priorities that National Strategic Priorities 4 and 5 should, in principle, have enabled the design and implementation of. As a result, some stakeholders expressed concern that some action items would not be delivered within the timeframe of the plan, or would be delivered to a lower standard due to pressure to complete them in the final year.

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I think we really need to probably think about how we set our targets and I think a more phased approach would be definitely something that we should possibly look at. (Consultation 18, Government: Policy and Programs)

Finally, there was a missed opportunity for the National Action Plan to garner support from state and territory governments and leverage the work being done at the jurisdictional level to support its objectives.

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The absence of states and territories being involved in the current action plan is a huge gap. This is not a problem that can be solved through federal actors alone. It needs to be a nationally guided but locally delivered response where you're harnessing stakeholders, networks and expertise ... Just because it's been criminalised at the national level, it's a victim-based crime. Victim-based crime happens in communities. (Consultation 14, Government: Other)

I recognise the practical challenges in that the Australian Government can't dictate to the states and territories, but there is a reality in terms of Australia's response needing to have buy-in from the states and territories. And so I think it's really a matter of the National Action Plan looking at what mechanisms are there that the Australian Government can use to show national leadership on the issue and to provide guidance to the states and territories about the things they could do that would have the greatest impact ... looking at what are the mechanisms federally that could be used to really try and engage states and territories in these issues. (Consultation 15, Government: Other)

Governance and operationalisation of the National Action Plan

The National Action Plan was implemented with a high degree of fidelity, with all progressed action items endorsed as completed, while retaining flexibility to adapt activities where required. Stakeholders emphasised the importance of the National Action Plan in providing clear, coordinated and cohesive guidance for action, giving government and civil society stakeholders the authority and direction needed to progress initiatives and focus collective effort. It was also seen as a useful tool in international engagement, enabling the Australian Government to clearly articulate its priorities and areas of focus.

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I think the National Action Plan has guided our chain of command up higher and then that's then flowing down to us in terms of what they want us to focus on ... I think it's positive in the sense that it's certainly brought a lot more awareness I think to our offices and informed our operational planning. (Consultation 2, Government: Law Enforcement and Regulation)

I think the biggest thing I see around having the National Action Plan and the importance of being able to drive those changes is having that direction agreed and set with government ... Having the National Action Plan is the mechanism that's going to allow us to take those things forward with the authority from government ... The National Action Plan keeps the momentum and consistency in the approach. (Consultation 20, Government: Policy and Programs)

It puts some process and a framework around how we deal with this problem because it's so big ... and it gives some guidance on how to navigate this, this crime type and the action items ... It clearly articulates to all agencies how we plan to fix the problem or how we plan to move forward and navigate this. (Consultation 7, Government: Law Enforcement and Regulation)

I find it incredibly useful in terms of giving us an indication of Australian priorities in terms of modern slavery ... knowing that over this period of time these are the things that will be the focal points, which allows us to plan the work that we do. The other thing that we find it really helpful for is in a lot of our international engagements. So actually being able to point to the things that Australia's focused on that are Australian priorities in terms of informing the work that we do with our counterparts. (Consultation 15, Government: Other)

Stakeholders further highlighted efforts to strengthen the representation and engagement of people with lived experience in its delivery:

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Engagement with lived experience is relatively new in this space and is still forming and developing in meaningful ways, but I think it's making a difference, bringing lived experience more into the discussions ... I think it's really made an impact and a difference. (Consultation 20, Government: Policy and Programs)

There is a voice now. There's been a group [of lived experience experts] that's been set up that communicates directly with members of Parliament about their issues and there have been some [national] roundtables where they've participated ... I think all of that's important because we can't make decisions for them. They have to be decisions that are based on what their real needs are and, therefore, their voice is important. (Consultation 39, Civil Society)

Even with these improvements, some people with lived experience still felt there remained opportunities to enhance how engagement with them was approached.

“

The next action item can be improved by ... having survivor inclusion from the beginning of the project ... [to] co-design, co-implement and then throughout the whole process have survivors involved in measuring, implementing and even having a feedback mechanism as well as to what parts of the project has worked, what hasn't worked and how we can re rectify it. (Consultation 44, Person with lived experience)

I think that the next plan should move from consultation to governance. I feel to make a really, really strong shift, survivors really do need that decision-making power integrated into each step of the process, not after decisions are made necessarily. (Consultation 44, Person with lived experience)

Stakeholders identified several additional challenges relating to the governance and operationalisation of the National Action Plan. In particular, the changing political environment during the term of the plan, and resulting machinery-of-government changes, required responsible agencies to balance implementation as it was intended with the need to be adaptable to ensure action items could be delivered.

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We need to remain agile, flexible and open as to how this area of public policy and international developments are evolving. So we need to remain open to delivering on our commitments in the context of a rapidly changing environment around us. (Consultation 11, Government: Policy and Programs)

It was hard to implement as intended because of the changing environment. The sector has changed a lot between 2020 and 2024 ... Those responsible had to be quite flexible and interpret meaning behind the action item—Why was the item in there to begin with? What was the purpose of it? We needed to make sure the intention was fulfilled but also that the final product reflected the current environment. So maybe [action items were] not implemented as intended, but that was necessary due to the environment. (Consultation 9, Government: Policy and Programs)

Due to machinery-of-government changes, responsibility for some action items was transferred between agencies or subdivided, which contributed to confusion regarding oversight and delayed delivery. Some government stakeholders believed their agency should have remained responsible for action items that were transferred to another agency, while others were jointly responsible but lost oversight of the action item and therefore found it difficult to contribute to delivery and observe progress and outcomes.

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There is a significant lack of understanding, I would still say, between all of us about where our responsibilities lie and where the lines are between us. (Consultation 4, Government: Law Enforcement and Regulation)

There were quite a few things that I thought we needed to be accountable for. But somehow when the action items have been broken up, much of it has gone [to other agencies], but I haven't had any visibility of how they've actually engaged with us to deliver the things that we could have delivered ... There are quite a few touch points that I would have expected whoever owns those action items to be reaching out to us on. (Consultation 3, Government: Law Enforcement and Regulation)

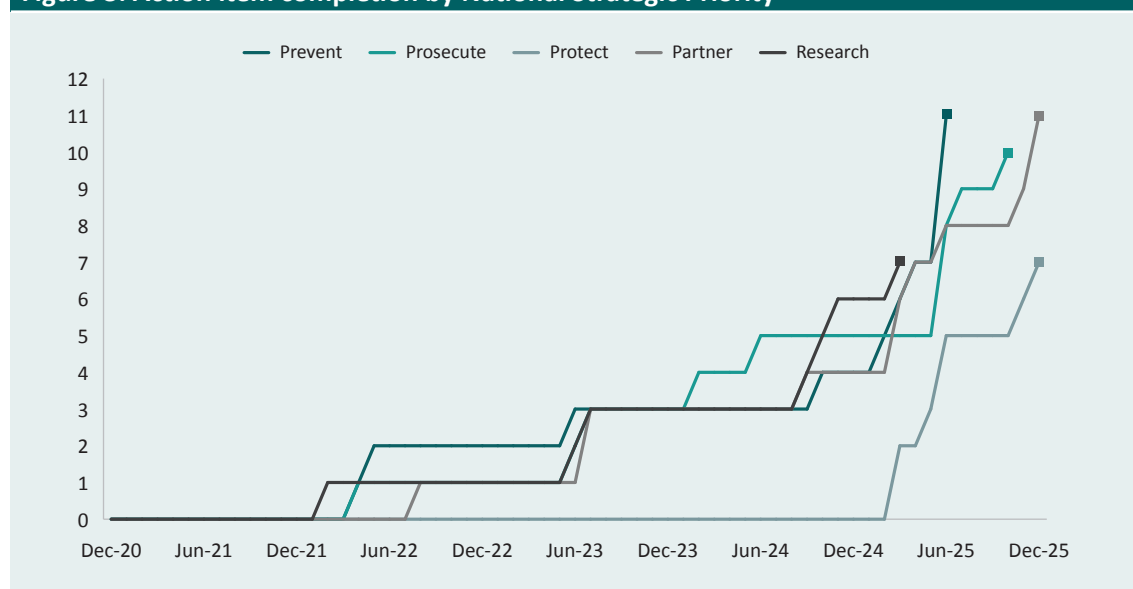
Confusion was also caused by some action items having multiple responsible agencies. While assigning multiple agencies to an action item was intended to support collaboration, stakeholders noted that there was often insufficient clarity about which organisation held lead responsibility for coordinating delivery. This lack of clearly designated leadership created uncertainty regarding roles and responsibilities and, again, delayed delivery. Clearly identifying a lead agency for each action item would help strengthen coordination, accountability and oversight, and facilitate timelier implementation.

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There are a lot of agencies involved [in delivering the action item]. Having that breadth of responsibility makes it hard to get appetite and engagement ... It's harder with more people involved. Not sure of the intention when [agencies] were signed up to be responsible, but it's hard to get traction there now. (Consultation 9, Government: Policy and Programs)

Delays in the delivery of the National Action Plan were also compounded by the lack of a sequenced or phased approach to the delivery of action items (see *Development of the National Action Plan* above). Consequently, a disproportionate number of action items were delivered within the final 18 months of the plan (see Figure 3), including some that may have more effectively supported or informed other action items, had they been delivered earlier. Timeframes for completion of action items and outputs under each National Strategic Priority are included under their relevant headings.

Figure 3: Action item completion by National Strategic Priority



Source: AIC Evaluation of the *National Action Plan to Combat Modern Slavery 2020–25*

Stakeholders also raised concerns about the strength of accountability mechanisms supporting implementation and oversight of the National Action Plan. Accountability largely consisted of action item completion reports drafted by responsible agencies and presented to the IDC for endorsement. While in later years completion reports were expected to contain greater evidence and detail, the overall approach was viewed as a relatively weak form of accountability, as it lacked independent oversight and provided limited opportunity for open scrutiny or meaningful reflection on the progress or completion of action items. Further, government stakeholders noted that endorsement processes did not appear to involve substantial engagement or opportunities for contestability. Establishing more regular, independent and transparent monitoring of progress against action items—for example, by the Australian Anti-Slavery Commissioner—would strengthen accountability and ensure activities are not unintentionally causing harm to victim-survivors.

Further, ambiguity regarding what constituted completion of an action item created challenges for reporting and accountability. Some action items were broadly framed or indefinite in scope, with limited guidance on what specific deliverables or outcomes would demonstrate completion. This lack of clarity made it difficult for responsible agencies and the IDC to determine when an action item could be endorsed as completed.

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There are different ways some of the action items can be understood and interpreted. What was the scope? What was the intention? Different stakeholders have different interpretations of what should be done. That makes it hard to know whether things have been implemented as intended ... There are a lot of activities that can be ticked off ... but it's hard to measure [success] without scoping in place, and having determined and defined aims, outcomes and measurements. (Consultation 13, Government: Policy and Programs)

Stakeholder feedback also indicated that periodic reporting requirements associated with action items could be streamlined. While quarterly and ad hoc reporting was intended to demonstrate progress, some stakeholders felt the requirements were burdensome and diverted time and effort away from delivery. There was also limited evidence that reporting outputs were systematically used to inform decision-making or improve implementation of action items or the National Action Plan more broadly.

In addition, stakeholders perceived that awareness of the National Action Plan was low, both in terms of its existence and content, among staff in agencies responsible for achieving its objectives as well as among relevant state and territory government and non-government stakeholders. Awareness was largely confined to staff in senior roles and those involved in the IDC and National Roundtable on Human Trafficking and Slavery (National Roundtable). Stakeholders felt that greater awareness would help bring attention to key areas of focus in order to progress activities and outcomes.

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I think there is lack of visibility of the National Action Plan, both within government agencies but also more broadly. I think if you asked any stakeholder who is outside membership of the National Roundtable, there would be some pretty low levels of awareness around the National Action Plan and the particular action items and how those action items are being progressed. (Consultation 20, Government: Policy and Programs)

Finally, funding and resourcing constraints were consistently identified as a barrier to effective implementation. Stakeholders commonly described the challenge of delivering action items without dedicated funding attached to the National Action Plan. In practice, most activities were delivered within existing departmental budgets, limiting the capacity of agencies to undertake work beyond business-as-usual responsibilities. Stakeholders noted that continuing to rely primarily on existing resources means agencies prioritise actions that can be achieved within budgetary constraints, and this is unlikely to generate the level of change required to achieve improved outcomes against the National Action Plan's priorities.

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If we're going to fully take action in support of the National Action Plan then there needs to be centralised funding to make sure everything can be achieved. (Consultation 1, Government: Law Enforcement and Regulation)

If [the National Action Plan] is about continuing the work we've been doing, then there probably isn't necessarily much of a need for additional funding. But if we want to be ambitious and want to be very proactive ... then naturally that requires resourcing. (Consultation 18, Government: Policy and Programs)

Agencies are delivering those actions within existing capabilities and resources. I think that's challenging ... and I think it also makes it difficult for agencies to prioritise [National Action Plan] actions out of their whole scope of work ... It's difficult to make those prioritisation and resource allocation decisions without funding or resources attached to them specifically. (Consultation 20, Government: Policy and Programs)

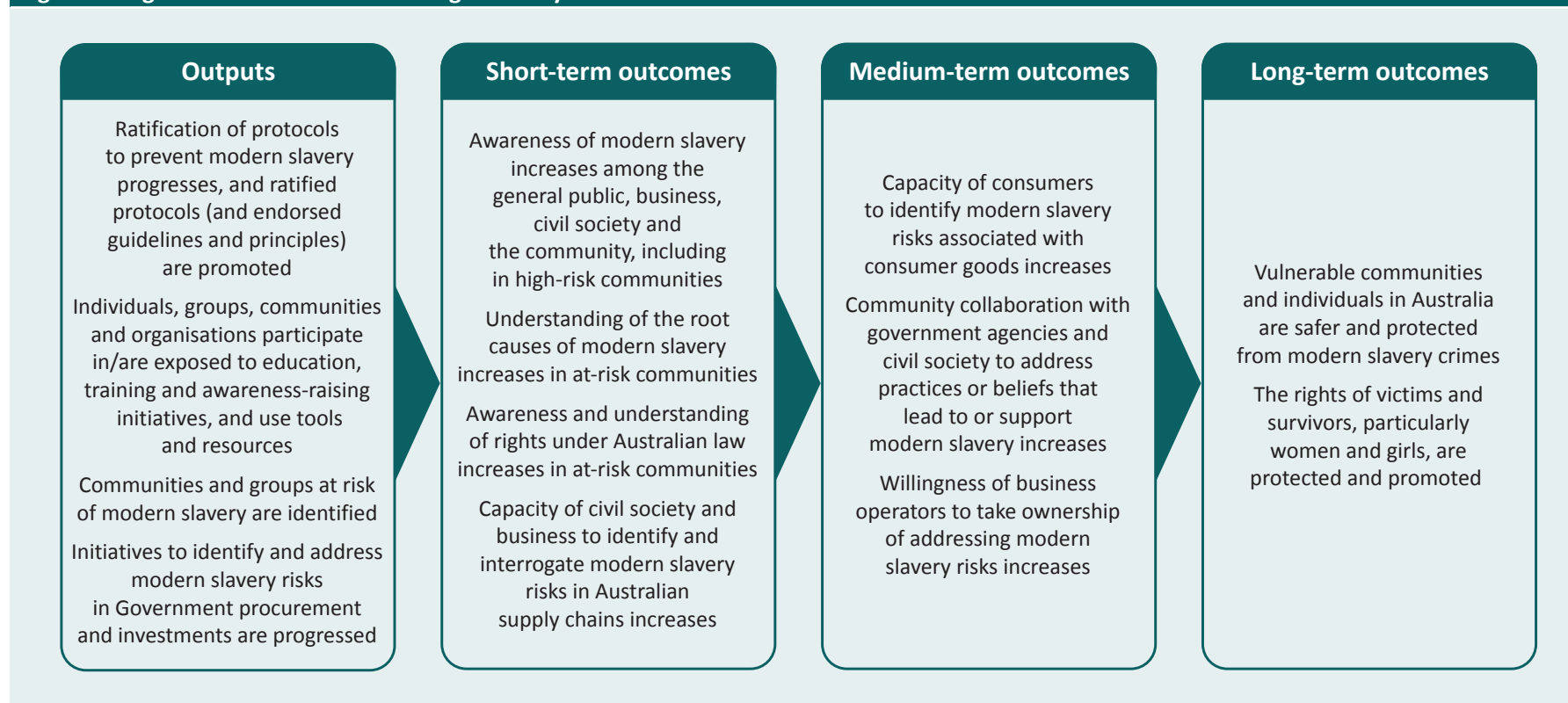
National Strategic Priority 1: Prevent

A core component of Australia’s response to modern slavery involves the implementation of primary prevention activities. Prevention was described in the National Action Plan as ‘the most effective way to eliminate modern slavery in Australia and abroad’ (Australian Government 2020: 22). Under this strategic priority, the Australian Government sought to address the drivers of modern slavery, empower individuals and communities at risk of modern slavery, and improve the Australian community’s awareness of modern slavery.

The logic model for National Strategic Priority 1 (see Figure 4) articulates how action items were intended to contribute to the two relevant longer-term outcomes articulated in the National Action Plan:

- vulnerable communities and individuals in Australia are safer and protected from modern slavery crimes; and
- the rights of victims and survivors, particularly women and girls, are protected and promoted.

Figure 4: Logic model for National Strategic Priority 1: Prevent



Implementation

This section assesses the implementation of action items under National Strategic Priority 1, how these action items contributed to outputs specified in the evaluation framework, and implementation successes, limitations and challenges. Action items were expected to result in the following outputs:

1. ratification of international protocols to prevent modern slavery progresses, and ratified protocols (and endorsed guidelines and principles) are promoted;
2. individuals, groups, communities and organisations participate in/are exposed to education, training and awareness-raising initiatives and use tools and resources;
3. communities and groups at risk of modern slavery are identified; and
4. initiatives to identify and address modern slavery risks in Government procurement and investments are progressed.

Action items contributed to the outputs under this National Strategic Priority as per Table 3.

Table 3: Action items under National Strategic Priority 1 (Prevent) and their contribution to relevant outputs				
Action item	Output			
	1	2	3	4
Action item 1: Provide funding and practical support through Australia's overseas development program and domestic grants programs to address drivers of modern slavery and empower individuals and groups vulnerable to modern slavery, including women and children ^a				
Action item 2: Deliver targeted awareness-raising initiatives on a range of modern slavery issues				
Action item 3: Deliver national awareness campaigns to the Australian community on modern slavery				
Action item 4: Launch new online information, tools and resources on modern slavery, translated into community languages				
Action item 5: Provide education and advice about workplace rights and protections under the <i>Fair Work Act 2009</i> and available Fair Work Ombudsman (FWO) services, to protect and empower vulnerable workers				
Action item 6: Deliver information and guidance to businesses, other reporting entities, investors and consumers on modern slavery risks in global supply chains and the <i>Modern Slavery Act</i> reporting requirements				
Action item 7: Progress initiatives to identify and address modern slavery risks in Government procurement and investments				

Table 3: Action items under National Strategic Priority 1 (Prevent) and their contribution to relevant outputs (cont.)

Action item	Output			
	1	2	3	4
Action item 8: Advocate for the promotion and protection of human rights, including adherence to international labour standards, in relevant international and regional forums				
Action item 9: Progress ratification of the <i>Forced Labour Protocol</i> of 2014				
Action item 10: Progress ratification of the International Labour Organization's <i>Minimum Age Convention</i> (C138)				
Action item 11: Promote the <i>Principles to Guide Government Action to Combat Human Trafficking in Global Supply Chains</i>				

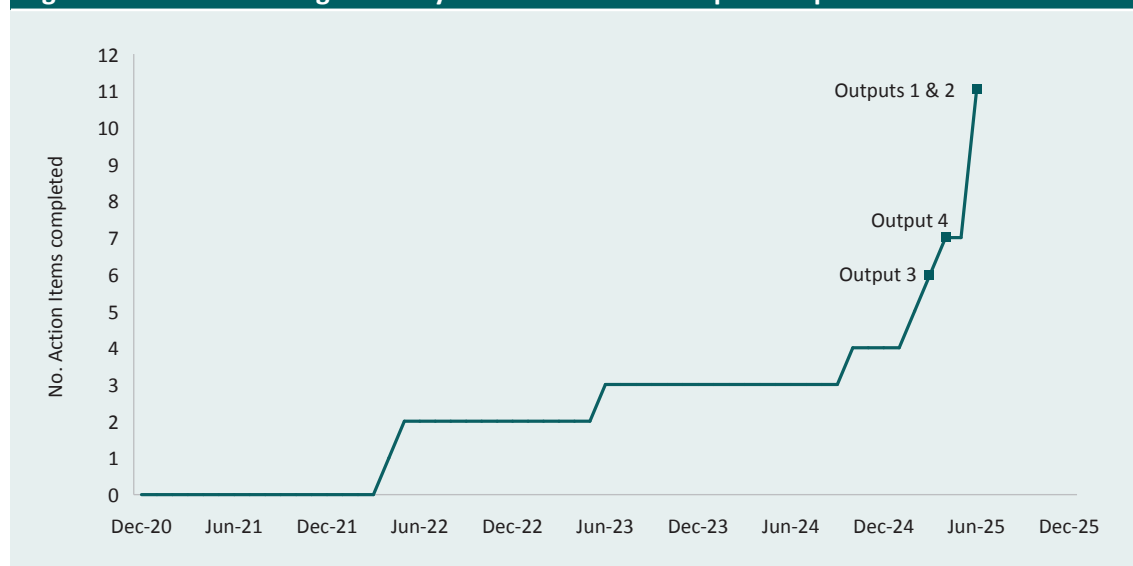
a: This action item also contributes to the following outputs under National Strategic Priority 4 (Partner) of the National Action Plan: Civil society organisations are funded to deliver programs in collaboration with government agencies; the Australian Government funds and delivers programs to prevent and respond to modern slavery domestically and overseas

Note: Activities undertaken for each action item are detailed in the *Appendix*

Source: Australian Government 2020

As discussed, many stakeholders reflected on the timeframes for delivery of action items. As demonstrated in Figure 5, most action items and all outputs under National Strategic Priority 1 were completed in 2025, the final year of the National Action Plan.

Figure 5: National Strategic Priority 1 action item and output completion timeline



Source: AIC Evaluation of the *National Action Plan to Combat Modern Slavery 2020–25*

Outputs achieved under National Strategic Priority 1

Output 1: Ratification of international protocols to prevent modern slavery progresses, and ratified protocols (and endorsed guidelines and principles) are promoted

Responsibility for ratifying the International Labour Organization’s (ILO) *Forced Labour Protocol* and the *Minimum Age Convention* sat with the Department of Employment and Workplace Relations. The former was ratified in March 2022 and came into effect in March 2023 (see action item 9 in the *Appendix*), and the latter was ratified in June 2023 and came into effect in June 2024 (see action item 10 in the *Appendix*). Following ratification, Australia must now complete triennial reports to the ILO on measures taken to implement the protocol.

The Australian Government also committed to promoting the *Principles to Guide Government Action to Combat Human Trafficking in Global Supply Chains* under the National Action Plan. They provide a framework from which all countries can build a strategy to take effective action to prevent and eradicate human trafficking from public and private sector supply chains.

Promotion of the principles was undertaken through three key strategies:

- implementation and promotion of relevant action items under the National Action Plan that give effect to the principles in Australia’s domestic law, policy and practice;
- promotion by AGD, the Department of Foreign Affairs and Trade (DFAT) and Australia’s Ambassador to Counter Modern Slavery, People Smuggling and Human Trafficking in various international and domestic forums, workshops, and publications; and
- participation in the five-country steering committee established to support the implementation of the principles, whose purpose is to establish priorities, goals, activities and deliverables for each year.

The principles have consequently become embedded in Australia’s response to modern slavery through legislation, policy, practice and advocacy (see action item 11 in the *Appendix*).

Output 2: Individuals, groups, communities and organisations participate in/are exposed to education, training and awareness-raising initiatives and use tools and resources

The below summary of activities includes education, training and awareness-raising initiatives delivered or funded by the Australian Government for the purposes of preventing modern slavery. To this end, it focuses on initiatives that were delivered to the community broadly (eg people at risk of modern slavery, community members and businesses) and excludes those that aim to improve the capacity of frontline responders to identify and respond to modern slavery. Such initiatives are described under National Strategic Priority 2.

Education and awareness-raising initiatives and resources developed and delivered by the Australian Government included:

- broad awareness-raising campaigns (eg World Day Against Trafficking in Persons media campaigns), which generated approximately 19 million social media impressions between 2022 and 2025; see action item 3 in the *Appendix*);
- targeted awareness-raising campaigns (eg awareness-raising in school communities and the entertainment and aviation sectors delivered by AFP; see action item 2 in the *Appendix*);
- education and advice about workplace rights and protections (eg establishing an Employer Advisory Service; see action item 5 in the *Appendix*); and
- information and guidance provided to businesses and other reporting entities to the *Modern Slavery Act 2018* (eg through the publication of *Commonwealth Modern Slavery Act 2018: Guidance for reporting entities* and tailored guidance notes on identified compliance and good practice trends; see action item 6 in the *Appendix*).

The reach of various awareness-raising and education resources was also supported by publication in community languages (eg the Modern Slavery in Australia website, the Family Safety Pack in the MyAus app and the *Compendium of good practice examples to combat exploitation in supply chains*; see action item 4 in the *Appendix*).

In addition, the AFP's Human Exploitation Community Officers connected with internal and external partners and the community to raise awareness of modern slavery and its indicators (see action item 12 in the *Appendix*).

Finally, the following awareness-raising, education and training initiatives were delivered by grant recipients under the Modern Slavery Grants Program (see action item 33 in the *Appendix*):

- *Let's talk: A holistic approach to preventing forced marriage within the Muslim community* (Australian Muslim Women's Centre for Human Rights)—a series of training programs which collectively reached 79 young Muslims, 84 Muslim parents and 49 frontline workers (see output 2 under National Strategic Priority 2). These were supported by an online campaign which reached over 1,000 users, and the dissemination of a brochure on supporting Muslim victims of forced marriage (Australian Muslim Women's Centre for Human Rights 2023);
- *Work Right Hub* and *Work Right Hub 2.0* (Australian Red Cross)—an online platform that provides accessible information on labour exploitation and sources of support to migrants and frontline responders;
- *Lived Experience Engagement Program* and *Strengthening and connecting survivor voices in Australia* (Salvation Army)—training for survivors of modern slavery to learn about self-care, voice and leadership, government responses to modern slavery, and how to influence government agencies and others who are working for rights and freedom;
- *Honour My Choice* (Taldumande Youth Services)—training programs to prevent forced marriage and support children and young people affected by forced marriage which were estimated to have reached 296 young people, over 730 school staff and over 400 community service staff;

- *Modern Slavery Impact Initiative* (Global Compact Network Australia)—training, forums and resources to support businesses to adopt a collaborative and multi-stakeholder response to modern slavery;
- *Improving the Regulation of Modern Slavery and Access to Remedy: Learning from Experience* (UNSW Sydney)—release of four reports that intended to improve understanding of modern slavery risks in global supply chains and develop an evidence base to inform policy and practice responses, which were promoted to relevant audiences through webinars, the media and social media;
- *Educating for Change: Preventing and responding to modern slavery amongst university students in pre-service courses* (Australian Catholic Religious Against Trafficking in Humans)—delivering free and accessible education to university students and staff to improve their ability to identify and respond to modern slavery in their fields (including social work, law, education, healthcare and university settings). The training can be tailored to meet the needs of specific sectors and is also available to the broader community (Australian Catholic Religious Against Trafficking in Humans 2026);
- *Shaping Futures: Prevention programs for young Muslim women* (Australian Muslim Women’s Centre for Human Rights)—forced marriage prevention programs delivered to Muslim young people to strengthen their ability to identify risks, understand their rights, advocate for themselves, and to increase help-seeking behaviours, as well as a program to support Muslim mothers to improve their awareness of forced marriage and strengthen their ability to resist community and familial pressures;
- *Developing and disseminating guidance and training materials to assist frontline workers, businesses and modern slavery survivors in taking a trauma-informed approach to preventing, identifying, and responding to modern slavery* (HerSpace)—development of a national guide, training module and other resources to support frontline workers in any discipline to implement a trauma-informed approach to preventing, identifying and responding to modern slavery, as well as resources on psychoeducation for survivors and training for the broader community (HerSpace 2025);
- *Everyday Slavery* (Kyla Raby)—a strategic awareness-raising campaign delivered through social media to equip the public to address modern slavery in global supply chains and the Australian community;
- *Migrant Worker Modern Slavery Research Project, and Training for Evidence-Based Responses to Modern Slavery in Australia* (Migrant Justice Institute)—a report that aimed to improve awareness of, and responses to, underpayment and exploitation of migrant workers in Australia, based on a survey of 10,000 migrant workers (Berg & Farbenblum 2026); and
- *Strategies to Prevent (SToP) Modern Slavery* (Settlement Services International)— guidance, resources and tools to support vulnerable individuals and communities at risk of modern slavery to improve awareness of their rights, particularly among multicultural communities.

Output 3: Communities and groups at risk of modern slavery are identified

Australian Government agencies invested in building the capacity of officials, in particular frontline responders, to identify and respond to indicators of modern slavery. The government delivered training, resources and awareness-raising initiatives, including in collaboration with civil society organisations, to support the identification and referral of victims.

To support the identification of modern slavery risks in supply chains, the Australian Government has engaged in significant domestic and international stakeholder outreach. This has included events and forums, the publication of information online (eg on the Modern Slavery Statements Register (AGD 2026) and the Modern Slavery Remediation Toolkit for Business (AGD 2025a)) and direct engagement with businesses through the Modern Slavery Statements Register Helpdesk. Further work in this space was undertaken by the Bali Process on People Smuggling, Trafficking in Persons and Related Transnational Crime (Bali Process), which Australia co-chairs with Indonesia, particularly through its Government and Business Forum and Regional Support Office. This included hosting events to discuss modern slavery risks in supply chains, as well as publishing resources including:

- a *Business and Investor Toolkit* to support Government and Business Forum members to take action to improve human rights standards and mitigate modern slavery risks in their supply chains;
- the publication *Protecting migrant workers in Indo-Pacific supply chains: A good practice guide for business and Bali Process member states* (International Organization for Migration 2022), which provides good practice and scalable solutions for business to protect migrant workers from exploitation; and
- the *Compendium of good practice examples to combat exploitation in supply chains* (Bali Process 2021), a resource for government policy makers that provides good practice examples for strengthening responses to exploitation in supply chains.

These and other relevant activities are described under action items 5 and 6 in the *Appendix*.

The following work was also undertaken by grant recipients under the Modern Slavery Grants Program (see action item 33 in the *Appendix*):

- *Let's talk: A holistic approach to preventing forced marriage within the Muslim community* (Australian Muslim Women's Centre for Human Rights)—a series of training programs that aimed to increase the Muslim community's understanding of forced marriage and its impact on women and girls, and their ability to identify and respond to people in or at risk of modern slavery through a multi-layered and culturally sensitive program targeting young women, parents and families;
- *Work Right Hub* and *Work Right Hub 2.0* (Australian Red Cross)—an online platform that aimed to prevent and address criminal labour exploitation in Australia and that includes information and tools to help migrants find support if they or someone they know is being exploited at work;
- *Modern Slavery Impact Initiative* (Global Compact Network Australia)—a series of forums and resources that aimed to support Australian businesses reporting under the *Modern Slavery Act 2018* and their suppliers to address modern slavery by providing information on high-risk suppliers and industries;

- *Safe and Empowered Families: A forced marriage prevention program* (Good Shepherd Australia New Zealand)—a program that aimed to prevent forced marriage in Australia by implementing an international model of support and building organisational capacity;
- *Honour My Choice* (Taldumande Youth Services)—aimed to improve understanding among young girls and their communities of forced marriage through training programs for young people, school staff and community service staff;
- *Improving the Regulation of Modern Slavery and Access to Remedy: Learning from Experience* (UNSW Sydney)—four reports that aimed to improve understandings of modern slavery risks in global supply chains by examining how risk factors differ across sectors and identifying high-risk sectors;
- *Shaping Futures: Prevention programs for young Muslim women* (Australian Muslim Women’s Centre for Human Rights)—programs that aim to increase understanding of forced marriage and its impact on women and girls among the Muslim community, including newly arrived migrants; and
- *Migrant Worker Modern Slavery Research Project, and Training for Evidence-Based Responses to Modern Slavery in Australia* (Migrant Justice Institute)—a report that aims to improve awareness of migrant workers’ lived experiences of, and responses to, severe underpayment in Australia.

Output 4: Initiatives to identify and address modern slavery risks in Government procurement and investments are progressed

A number of activities were undertaken to address modern slavery risks in Government procurement and investments, including:

- supply chain mapping and risk assessments of high-risk areas to identify and assess modern slavery risks in government procurement and investments;
- development, publication and dissemination of tools and guidance to lift capability across the public sector, including the Modern Slavery Toolkit for Procurement Officers, modern slavery e-learning modules for procurement officers, and an e-learning video in modern slavery risks in the cleaning industry;
- facilitation of presentations, workshops, working groups and conferences to increase officials’ capacity to assess and address modern slavery risks in government procurement and investments;
- establishment of an Intergovernmental Network on Modern Slavery in Public Procurement to drive action to address modern slavery risks in public procurement; and
- partnership with international counterparts through the Principles Steering Committee to support the implementation of the *Principles to guide governmental actions to combat human trafficking in global supply chains*.

Further details about these and additional activities are provided under action item 7 in the *Appendix*.

Implementation successes, limitations and challenges

Data from the Community Awareness Survey provides high-level evidence for the successful implementation of education, training and awareness-raising initiatives within the community. Findings from the survey indicated a small but statistically significant increase in the proportion of respondents who had completed training on modern slavery as part of their employment or education (7.3% in 2023 vs 8.5% in 2025; OR=1.17, 95% CI [1.00, 1.36], $p=0.048$; see Table 4). This was particularly true for women and respondents aged 35 years and over. While the proportions here remain low, and the difference is small, that an observable increase occurred over a relatively short period of time is positive.

Table 4: Participation in modern slavery training, by gender, age and CALD identity			
	2023 <i>n</i> =4,823 ^a	2025 <i>n</i> =4,808 ^b	
	%	%	<i>p</i>
Gender			
Man	9.5	10.1	0.478
Woman	5.4	7.0	0.021
Age (years)			
18–34	12.2	11.1	0.425
35 and over	5.4	7.3	0.001
CALD identity^c			
CALD	8.4	9.6	0.322
Non-CALD	7.1	8.1	0.120
Total	7.3	8.5	0.048

a: Excludes 183 respondents who did not provide this information

b: Excludes 134 respondents who did not provide this information

c: Refers to culturally and/or linguistically diverse respondents. This includes respondents who were of a non-English-speaking background, who were born overseas and/or who had one or more parents born overseas

Source: AIC Community Awareness of and Attitudes Towards Modern Slavery in Australia Survey 2023 and 2025 [computer file] [weighted data]

Respondents were also asked where they had previously heard information about modern slavery. Consistent with the above, there was a statistically significant increase in the proportion of respondents who had heard about modern slavery from their school or workplace (11.6% vs 14.2%, OR=1.27, 95% CI [1.12, 1.44], $p<0.001$; see Table 5). In addition, there was a small but statistically significant decrease in the proportion of respondents who had heard information about modern slavery from law enforcement sources (19.8% vs 17.5%, OR=0.86, 95% CI [0.77, 0.96], $p=0.005$).

Table 5: Sources of information on modern slavery by gender, age and CALD identity

	Government			Law enforcement			Non-government organisation			School or workplace			Social media		
	2023	2025		2023	2025		2023	2025		2023	2025		2023	2025	
	%	%	<i>p</i>	%	%	<i>p</i>	%	%	<i>p</i>	%	%	<i>p</i>	%	%	<i>p</i>
Gender															
Man	25.8	30.3	0.002	22.0	20.9	0.390	12.3	14.4	0.047	10.5	13.8	0.001	17.3	18.5	0.320
Woman	18.6	17.7	0.428	17.8	14.5	0.002	12.6	11.8	0.398	12.2	14.5	0.022	22.5	21.4	0.384
Age (years)															
18–34	33.7	35.2	0.406	23.7	20.5	0.059	18.2	15.2	0.048	20.6	22.4	0.261	30.5	27.2	0.072
35 and older	17.1	18.4	0.155	18.1	16.2	0.034	9.9	12.1	0.006	7.7	10.7	0.000	15.7	17.0	0.139
CALD identity^a															
CALD	21.5	23.4	0.291	19.0	17.0	0.228	12.1	14.7	0.081	14.8	18.7	0.016	23.6	22.4	0.509
Non-CALD	22.1	23.6	0.150	20.1	17.6	0.009	12.4	12.4	0.976	10.7	12.7	0.013	19.0	19.3	0.709
Total	22.0	23.5	0.094	19.8	17.5	0.005	12.4	13.0	0.379	11.6	14.2	<0.001	20.1	20.1	0.981

a: Refers to culturally and/or linguistically diverse respondents. This includes respondents who were of a non-English-speaking background, who were born overseas and/or who had one or more parents born overseas. Note: The sample size of the 2023 survey was 4,630; excludes 376 respondents who did not provide this information. The sample size of the 2025 survey was 4,632; excludes 310 respondents who did not provide this information.

Source: AIC Community Awareness of and Attitudes Towards Modern Slavery in Australia Survey 2023 and 2025 [computer file] [weighted data]

During interviews, stakeholders also observed the value of education and awareness-raising initiatives delivered within communities of heightened risk and believed that modest and incremental change was evident.

“

I think community education has had success with specific communities, but it's been relatively small scale due to limited and inconsistent funding ... You know, it's a remarkable experience to work with community and gradually talk through fears and experiences and understanding where for some of the community members, they themselves were victims, they may not have identified it in that way in their lives, in their context, but to actually work through in a, you know, really trauma-informed way based on that kind of already existing community trust and actually seeing those communities re-craft different possibilities for their future and for their family's future. I think absolutely it's working. I think that the community education work is so important to actually stopping this. (Consultation 31, Civil Society)

The Modern Slavery Grants Program delivered several targeted awareness-raising initiatives, which were viewed positively for actively engaging with at-risk communities and sectors despite being constrained by timeframes and funding tied to the grant (described under *Output 2* above).

Australian Government stakeholders also viewed the implementation of awareness-raising initiatives positively due to the strong collaboration and coordination between agencies. They emphasised the value of post-implementation debriefing, as it enabled responsible agencies to reflect on what worked well and identify areas for improvement to strengthen planning and delivery of future awareness-raising activities.

However, stakeholders were still critical of efforts to improve knowledge and understanding of modern slavery across the Australian community more broadly. There was an expectation that a national approach to awareness-raising would be more strategic and sustained, using multiple channels to reach a broad audience. This would be complemented by targeted activities for communities at heightened risk, delivered through coordinated engagement with local community leaders, organisations and businesses.

In practice, the parameters and modes of national awareness-raising efforts were confined by available resourcing, and stakeholders observed that activities delivered by Australian Government agencies largely consisted of social media posts that were limited in volume, scale and duration, and were often tied to specific events such as World Day Against Trafficking in Persons, or information housed on the new Modern Slavery in Australia website: <https://www.modernslavery.gov.au/>.

The World Day Against Trafficking in Persons social media awareness-raising campaigns were informed by consultation across 10 government agencies and 13 civil society and business stakeholders, and a strategic assessment of existing Australian Government and grant-funded communications, products and resources, channels, audiences and messages relating to modern slavery, together with key civil society and business initiatives. Social media strategy and planning was supported by specific subject matter expertise from Universal McCann, engaged in accordance with whole-of-government arrangements, which advised on strategic approach, target audiences, formats and creative considerations, commensurate with available resourcing for the campaign. Campaigns consistently exceeded projected targets.

However, some stakeholders perceived there was limited evidence that strategic planning to support the effective delivery of awareness-raising campaigns included clearly defined target audiences, tailored messaging and appropriate delivery channels.

“

An awareness campaign in and of itself is not useful unless it actually delivers the outcomes that you want it to deliver. The fact that it's described in the National Action Plan as delivering the campaign, but not actually ensuring that the outcomes delivered by that campaign are effective, is a gap in the plan at the moment. (Interview 15, Government: Other)

While the Modern Slavery in Australia website was viewed as an important resource for centrally located information, and the World Day Against Trafficking in Persons campaigns exceeded reach targets, these time-bound and passive forms of awareness-raising were seen by some stakeholders as unlikely to lead to meaningful changes in awareness, knowledge, attitudes or behaviour such as reporting or help-seeking. However, analytics from these initiatives indicate they encouraged action among audiences. The 2024 World Day Against Trafficking in Persons social media campaign resulted in 9,832 'click-throughs' to the AFP's website, and the Modern Slavery in Australia website continues to drive visits to the AFP's online reporting form for human trafficking, slavery and slavery-like practices.

Stakeholders noted that assigning responsibility for awareness-raising to the ABF, and prevention activities more broadly to national law enforcement and regulatory agencies, may frame modern slavery primarily as an enforcement and border protection issue. In turn, this may reinforce perceptions that modern slavery occurs predominantly offshore or mainly affects migrant populations. Importantly, the ABF was the lead Commonwealth agency for modern slavery policy prior to this function transferring to AGD in 2022, and was therefore responsible for awareness-raising under the National Action Plan. Nevertheless, stakeholders emphasised the importance of awareness-raising efforts reflecting the presence of modern slavery within Australian communities, including through locally delivered initiatives and engagement with at-risk communities. While several Modern Slavery Grants Program recipients delivered awareness-raising initiatives within key communities and sectors, stakeholders continued to emphasise the need for a greater and more sustained focus on awareness-raising among frontline workers in health, education and community services to support greater consistency in knowledge, identification, and referral pathways for support.

“

One of the things that's probably stood out to me over the last few years is the way that prevention is defined in the plan and the way that it's then carried out, because there seems to be a high concentration on enforcement agencies when it comes to prevention. [There is] an opportunity perhaps not taken in wrapping in what NGOs do, and by that I mean on the ground where response also circles back to prevention and being kind of embedded in communities as well as seeing risks as they arise from a different lens to what maybe a law enforcement or a border force type lens might be. It's resulted in that being the focus when looking at prevention activities, and it seems to retain that full responsibility in enforcement agencies' hands. (Consultation 37, Civil Society)

If you want to raise awareness, you need to be thinking systematically about which audiences and which actors need to deliver that. And very quickly you would come to the conclusion that you need frontline workers, like healthcare workers, teachers, and police involved in the delivery of that priority under the National Action Plan, and you would therefore need a whole range of state and probably private sector [actors] when you think about healthcare and education actors involved. (Consultation 25, Government: Other)

People with lived experience further suggested that there were deficiencies in the information made available to people at risk of modern slavery:

“

[Australia] currently are not preventing it in ways that are visible within high-risk contexts. (Consultation 51, Person with lived experience)

When you apply for the working holiday visa, you get absolutely no information about your working rights ... It doesn't tell you anything about like how to check for scams, how to check, you know, the ABNs of these businesses, nothing like that. They didn't even give a pamphlet when you get granted the visa about your workers' rights, which I feel like should be standard ... When I applied, when I got the visa and when I entered Australia, I wasn't provided any information about workplace rights. (Consultation 50, Person with lived experience)

None of the non-English speakers that I was working with ... knew about workers' rights, because how would they? Because if you try to search it up on the Australian Government website, everything is listed in English. Even if you use the translation services, the page turns into the selected language, but the documents ... they're all still in English, so most of them just didn't bother reading it because ... you need someone to translate it for you which isn't really possible, especially when you're in regional Australia. (Consultation 50, Person with lived experience)

This suggests that there remain opportunities to prevent modern slavery by providing information to high-risk individuals and communities, including materials in community languages. It is, however, important to acknowledge the work undertaken by the Australian Government and as part of the Modern Slavery Grants Program to improve the availability of information to frontline workers and workers in high-risk areas (see *Output 2* above). For example, the Australian Muslim Women's Centre for Human Rights implemented a series of training programs which collectively reached over 300 people, including women from minority communities, young Muslims, Muslim parents and youth workers. Further, the Australian Red Cross introduced the *Work Right Hub*, an online platform that provides information to migrants and frontline responders on labour exploitation and sources of support.

Finally, while stakeholders perceived that awareness-raising and the provision of information to at-risk communities and the broader population was important, they also felt that more emphasis should have been placed on initiatives aimed at addressing the structural and systemic root causes of modern slavery, including initiatives focused on economic empowerment, improving supply chain transparency, reducing vulnerabilities related to out-of-home care for children, and promoting gender equality.

Outcomes

Stakeholders generally perceived that awareness of modern slavery had improved among frontline responders, government officials, businesses and the broader Australian community over the life of the National Action Plan. This increased awareness was thought to have contributed to an increase in reporting of modern slavery to authorities and to improved identification of potential victim-survivors. Data from the NMDS supports this, showing an increase in the number of reports made by members of the public between 2022–23 (7.8%, $n=22$) and 2024–25 (32.4%, $n=120$).

These perceptions were also partially supported by findings from the Community Awareness Survey, although some inconsistencies between stakeholder views and survey results were observed. While just over half of respondents to the 2025 survey reported that they did not think they could identify a victim of modern slavery (54.3%, $n=2,683$), most were able to recognise specific forms of exploitation when presented with scenarios. Recognition was highest for sexual exploitation (96.8%) and labour trafficking (93.4%), while identification of forced marriage was lower (69.1%).

Comparisons between the 2023 and 2025 survey data indicate small but statistically significant increases in the Australian community's ability to identify modern slavery scenarios, including labour trafficking (90.5% to 93.4%; OR=1.49, 95% CI [1.23, 1.80], $p=0.000$), sexual exploitation (94.6% to 96.8%; OR=1.74, 95% CI [1.34, 2.25], $p=0.000$), and forced marriage (65.3% to 69.1%; OR=1.19, 95% CI [1.06, 1.34], $p=0.003$). Improvements in respondents' ability to identify modern slavery were more common among women, older respondents and non-CALD respondents (see Table 6).

Table 6: Ability to identify modern slavery by gender, age and CALD identity

	Labour trafficking			Sexual exploitation			Forced marriage		
	2023 ($n=3,336$)	2025 ($n=3,283$)		2023 ($n=3,343$)	2025 ($n=3,304$)		2023 ($n=3,333$)	2025 ($n=3,297$)	
	%	%	p	%	%	p	%	%	p
Gender									
Men	88.7	91.0	0.050	92.9	96.0	0.000	60.4	64.1	0.056
Women	92.1	95.7	0.000	96.2	97.4	0.040	69.9	73.5	0.033
Age (years)									
18–34	89.0	91.8	0.062	95.7	97.4	0.002	65.4	68.9	0.152
35 and over	91.1	94.2	0.000	91.9	95.6	0.003	65.2	69.2	0.010
CALD identity^a									
CALD	90.1	94.2	0.004	94.3	96.5	0.049	62.3	65.3	0.268
Non-CALD	91.0	93.3	0.006	95.0	97.0	0.001	66.4	70.3	0.008
Total	90.5	93.4	0.000	94.6	97.0	0.000	65.3	69.1	0.003

a: Refers to culturally and/or linguistically diverse respondents. This includes respondents who were of a non-English-speaking background, who were born overseas and/or who had one or more parents born overseas
Source: AIC Community Awareness of and Attitudes Towards Modern Slavery in Australia Survey 2023 and 2025 [computer file] [weighted data]

Respondents who were able to identify modern slavery in these scenarios were then asked how likely they would be to report this situation. Between 2023 and 2025, there was no statistically significant change in the proportion of respondents who indicated that they would be likely to report suspected labour trafficking (90.7% vs 89.6%; OR=0.88, 95% CI [0.83, 1.06], $p=0.166$), sexual exploitation (95.4% vs 95.5%; OR=1.02, 95% CI [0.79, 1.32], $p=0.862$) or forced marriage (72.6% vs 73.6%; OR=1.05, 95% CI [0.91, 1.22], $p=0.520$). This was true regardless of respondents' demographic characteristics (see Table 7).

Table 7: Likelihood of reporting suspected modern slavery by gender, age and CALD identity									
	Labour trafficking			Sexual exploitation			Forced marriage		
	2023 ($n=$ 2,620)	2025 ($n=$ 2,862)		2023 ($n=$ 2,630)	2025 ($n=$ 2,717)		2023 ($n=$ 1,729)	2025 ($n=$ 1,842)	
	%	%	p	%	%	p	%	%	p
Gender									
Man	90.2	89.4	0.547	95.0	94.8	0.860	73.2	74.4	0.600
Woman	91.4	89.6	0.118	95.8	96.1	0.656	72.0	72.7	0.699
Age (years)									
18–34	89.9	89.1	0.606	94.0	96.0	0.087	73.3	78.3	0.055
35 and over	91.1	89.8	0.187	96.0	95.3	0.275	72.3	71.3	0.566
CALD identity^a									
CALD	90.8	89.3	0.382	95.6	95.7	0.937	69.8	70.1	0.904
Non-CALD	90.9	89.5	0.174	95.6	95.4	0.843	73.2	74.6	0.441
Total	90.7	89.6	0.166	95.4	95.5	0.086	72.6	73.6	0.520

a: Refers to culturally and/or linguistically diverse respondents. This includes respondents who were of a non-English-speaking background, who were born overseas and/or who had one or more parents born overseas

Source: AIC Community Awareness of and Attitudes Towards Modern Slavery in Australia Survey 2023 and 2025 [computer file] [weighted data]

Taken together, these findings suggest that while the community's awareness of modern slavery has improved, there has been little change in their motivation or capacity to act.

Respondents were also asked to indicate the industries that they believed were most susceptible to modern slavery in Australia. Globally, modern slavery is estimated to occur most frequently in the following sectors (presented in no particular order):

- domestic work;
- the services sector (eg hospitality, accommodation and food services);
- construction;
- manufacturing; and
- agriculture, forestry and fishing (ILO, Walk Free Foundation & International Organization for Migration 2022, 2017).

Between 2023 and 2025, there was a small but statistically significant increase in respondents' ability to identify one or more high-risk industries (93.4% vs 94.7%, OR=1.25, 95% CI [1.04, 1.51], $p=0.018$). Improvements in respondents' ability to identify high-risk industries were more common among women and younger respondents (see Table 8).

Table 8: Identification of industries at high risk of modern slavery, by gender, age and CALD identity			
	2023 <i>n</i> =4,192 ^a	2025 <i>n</i> =4,229 ^b	
	%	%	<i>p</i>
Gender			
Man	92.5	92.7	0.769
Woman	94.3	96.4	0.001
Age (years)			
18–34	87.4	91.7	0.001
35 and over	96.1	96.0	0.923
CALD identity^c			
CALD	92.9	93.7	0.485
Non-CALD	93.9	95.0	0.059
Total	93.4	94.7	0.018

a: Excludes 814 people who did not provide this information

b: Excludes 713 people who did not provide this information

c: Refers to culturally and/or linguistically diverse respondents. This includes respondents who were of a non-English-speaking background, who were born overseas and/or who had one or more parents born overseas

Source: AIC Community Awareness of and Attitudes Towards Modern Slavery in Australia Survey 2023 and 2025 [computer file] [weighted data]

Stakeholders emphasised that awareness-raising efforts would be most effective when targeted to communities at heightened risk and delivered through approaches that enable deeper engagement. This includes developing content that reflects the specific risks faced by different communities and equipping individuals with the knowledge and confidence to take meaningful action—such as educating others, challenging harmful attitudes and practices, identifying indicators of modern slavery, and knowing how to respond if exploitation is suspected.

In practice, however, awareness-raising activities were not consistently underpinned by clearly defined target audiences, tailored messaging, or the use of creative channels to maximise engagement. These gaps were compounded by the absence of formal evaluation, meaning that key indicators—such as reach, engagement and attitudinal or behavioural change among target groups—were not systematically captured. As a result, it is not possible to determine the effectiveness of these initiatives or the extent to which they contributed to intended outcomes.

These findings suggest that future awareness-raising efforts would benefit from a more strategic and targeted approach, supported by clearly defined objectives, measurable indicators and embedded evaluation processes to assess effectiveness and inform future campaigns.

Finally, stakeholders suggested that the capacity of businesses to recognise modern slavery within supply chains has increased, which was primarily attributed to the review of the *Modern Slavery Act 2018* and engagement on reporting requirements for the Modern Slavery Statements Register. Stakeholders felt positive outcomes related to the capacity of businesses to identify, interrogate and respond to modern slavery could be enhanced by further engagement and a greater focus on supply chains in Australia’s next strategic response.

“

You now have a very strong corporate commercial interest and there’s a lot of consultancies out there who are interested in how the [Modern Slavery] Act is tracking and what commitments have been made under the National Action Plan that relate to the *Modern Slavery Act*. (Consultation 35, Civil Society)

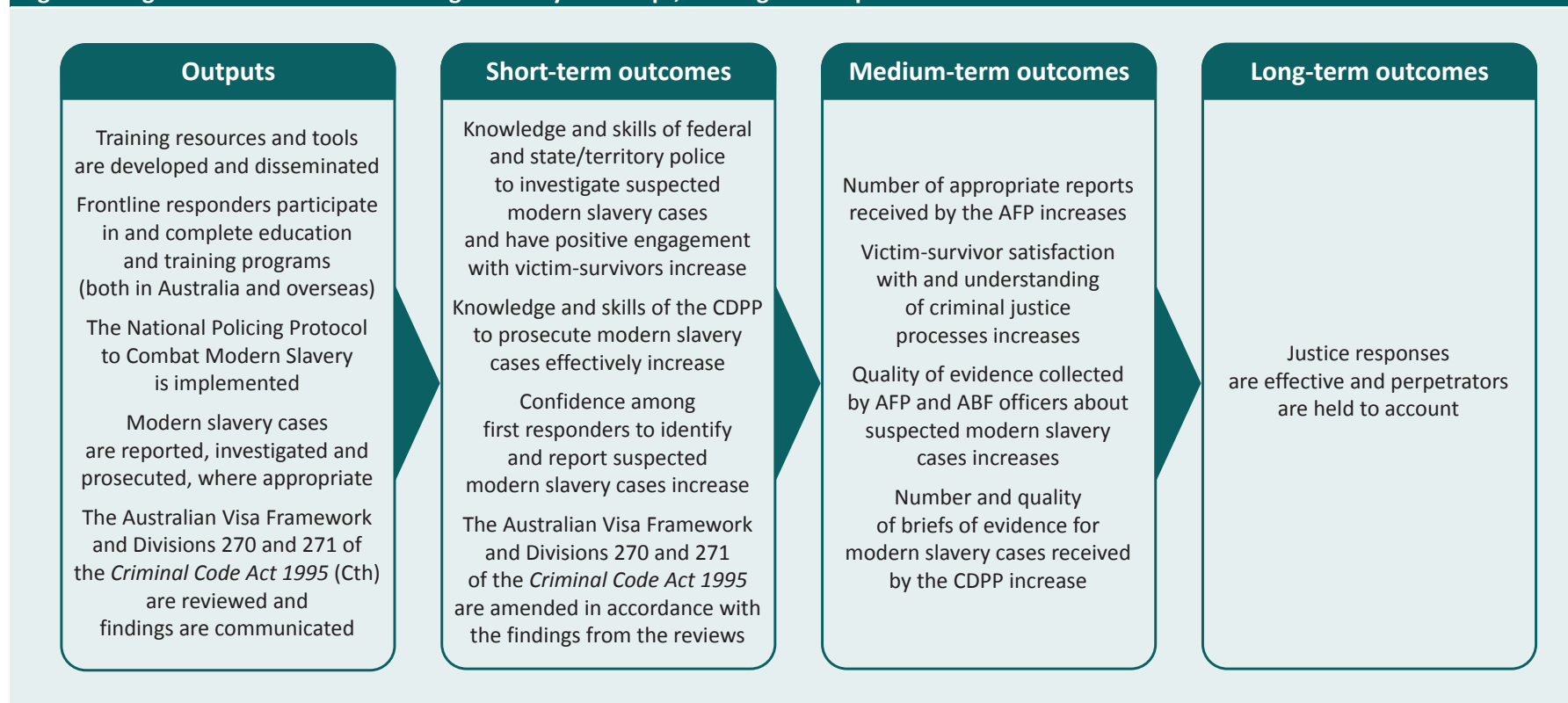
I’m not seeing a lot of small companies represented in those advisory groups and that’s where risk is likely to happen and where we can start to address risk. I see business as a sort of opportunity that has been included in the National Actual Plan a little bit, but I see it as a huge opportunity ... I think we absolutely need to think more broadly about how we bring business in. (Consultation 33, Civil Society)

National Strategic Priority 2: Disrupt, investigate and prosecute

The National Action Plan considered a strong criminal justice response essential to deter individuals from committing these crimes and to hold perpetrators accountable for their actions. As part of this National Strategic Priority, the National Action Plan sought to enhance identification and disruption of modern slavery, enhance investigations and prosecutions, and strengthen Australia’s legislative framework to ensure its ongoing effectiveness.

The logic model for National Strategic Priority 2 (see Figure 6) articulates how action items were intended to contribute to the one relevant longer-term outcome articulated in the National Action Plan: justice responses are effective and perpetrators are held to account.

Figure 6: Logic model for National Strategic Priority 2: Disrupt, investigate and prosecute



Implementation

This section assesses the implementation of action items under National Strategic Priority 2, how they contributed to outputs specified in the evaluation framework, and implementation successes, limitations and challenges. Action items were expected to result in the following outputs:

1. training resources and tools are developed and disseminated;
2. frontline responders participate in and complete education and training programs (both in Australia and overseas);
3. the National Policing Protocol to Combat Modern Slavery is implemented;
4. modern slavery cases are reported, investigated and prosecuted, where appropriate; and
5. the Australian Visa Framework and Divisions 270 and 271 of the *Criminal Code Act 1995* (Cth) are reviewed and findings are communicated.

Action items contributed to the outputs under this National Strategic Priority as per Table 9.

Table 9: Action items against National Strategic Priority 2 (Disrupt, investigate and prosecute) and their contribution to relevant outputs

Action item	Output				
	1	2	3	4	5
Action item 12: Promote and distribute indicators of the different types of modern slavery					
Action item 13: Deliver training, resources and awareness-raising initiatives, in collaboration with civil society organisations, to a broad cross-section of frontline responders to support the identification and referral of victims and survivors, and the disruption of modern slavery practices. Frontline responders include law enforcement, workplace inspectors, education and health officials					
Action item 14: Provide resources and deliver training for state and territory police officers to identify and refer cases of modern slavery to the AFP					
Action item 15: Expand existing training for ABF officers to identify and refer cases of modern slavery to the AFP, particularly in relation to serious labour exploitation					
Action item 16: Provide ongoing dedicated specialist resources to AFP officers to identify, disrupt and investigate cases of modern slavery					
Action item 17: Provide resources and deliver training for prosecutors and lawyers on prosecuting and managing cases of modern slavery					

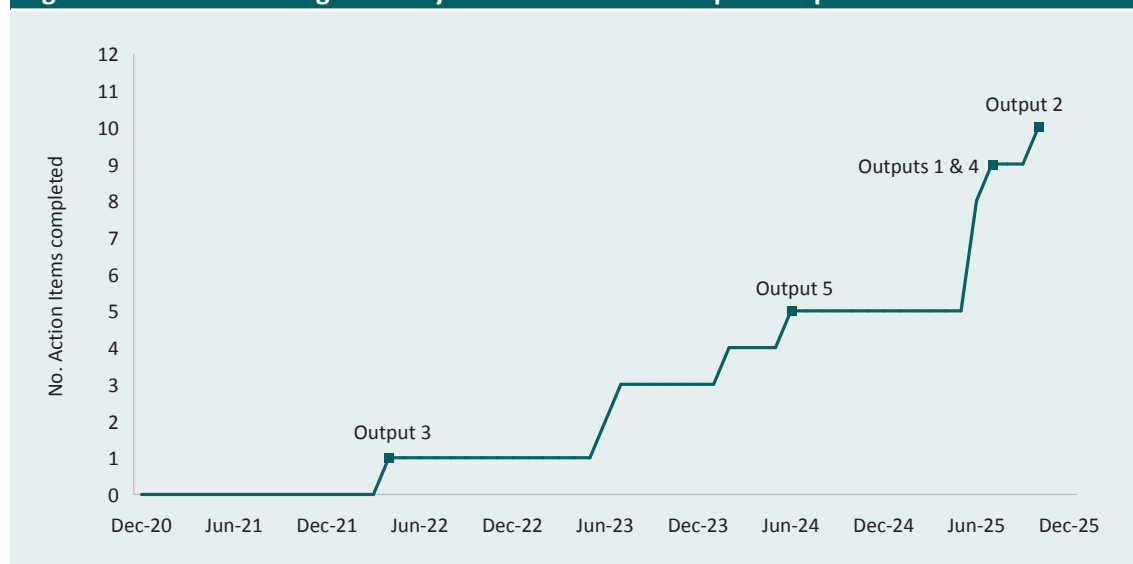
Table 9: Action items against National Strategic Priority 2 (Disrupt, investigate and prosecute) and their contribution to relevant outputs (cont.)

Action item	Output				
	1	2	3	4	5
Action item 18: Implement the National Policing Protocol to Combat Modern Slavery, which will guide cooperation between federal, state and territory law enforcement to detect and investigate modern slavery					
Action item 19: Undertake a targeted review of the modern slavery offences in Divisions 270 and 271 of the Criminal Code					
Action item 20: Undertake a targeted review of Australia's visa framework, including to identify and reduce vulnerabilities to modern slavery					
Action item 21: Deliver and fund overseas capacity-building activities to support the identification of victims and survivors, and the investigation and prosecution of modern slavery crimes					

Note: Progress made under each action item is detailed in the *Appendix*
Source: Australian Government 2020

As discussed, many stakeholders reflected on the timeframes for delivery of action items under the National Action Plan. Timeframes for completion of outputs and action items under this National Strategic Priority are summarised in Figure 7. Over two-thirds of action items under this National Strategic Priority were completed in the final two years of the plan, and half in the final year. Most outputs were also completed towards the end of 2025, the final year of the plan.

Figure 7: National Strategic Priority 2 action item and output completion timeline



Source: AIC Evaluation of the *National Action Plan to Combat Modern Slavery 2020–25*

Outputs achieved under National Strategic Priority 2

Output 1: Training resources and tools are developed and disseminated

A stocktake of modern slavery training initiatives, commissioned by the ABF and finalised in 2023, found good coverage of training needs for Australian Government frontline responders. The stocktake also identified a number of gaps, including inconsistent messaging, non-standardised training for some frontline responder groups and gaps in delivery at the state and territory level. Activities towards this output centred on addressing these gaps, and included Australian Government training activities and training initiatives funded under the Modern Slavery Grants Program.

Training programs and awareness-raising initiatives that were developed for and disseminated to frontline officers include:

- AFP's LALD (delivered to AFP, ABF and state and territory police agencies; see action item 14 in the *Appendix*) and Human Trafficking Investigations Course (see action item 16 in the *Appendix*);
- Home Affairs' HTVF training, Overseas Preparation Program and targeted training for Human Trafficking Contact Officers, Field Compliance Officers and Visa Processing Officers;
- ABF's Airline Liaison Officer Virtual Training Course;
- CDP's targeted training for prosecutors and Witness Assistance Service staff;
- FWO's tailored training for Fair Work Inspectors; and
- DSS's maintenance of the STPP Communications Manual, which assists the Operational Working Group on Human Trafficking and Slavery (OWG) and service providers to understand their roles and responsibilities regarding STPP clients.

In addition, the AFP's Human Exploitation Community Officers connected with internal and external partners to raise awareness of modern slavery and its indicators (see action item 12 in the *Appendix*).

The following training resources and tools for frontline responders were developed and disseminated by grant recipients under the Modern Slavery Grants Program (see action item 33 in the *Appendix* for more information):

- *Let's talk: A holistic approach to preventing forced marriage within the Muslim community* (Australian Muslim Women's Centre for Human Rights)—a series of training programs delivered to 49 frontline workers, including teachers, youth workers, social workers and family violence practitioners, as well as community members (see Outputs 2 and 3 under *National Strategic Priority 1*);
- *Work Right Hub* and *Work Right Hub 2.0* (Australian Red Cross)—training for frontline workers and community members to develop their knowledge and skills in responding to labour exploitation, and a guide for identifying modern slavery, reducing risk and referring suspected victims to support;

- *Safe and Empowered Families: A forced marriage prevention program* (Good Shepherd Australia New Zealand)—a comprehensive forced marriage training program delivered to over 300 participants from the community services sector;
- *Honour My Choice* (Taldumande)—training programs to prevent forced marriage and support children and young people affected by forced marriage, delivered to over 730 school staff and 400 community service staff, as well as 296 young people;
- *Educating for Change: Preventing and responding to modern slavery amongst university students in pre-service courses* (Australian Catholic Religious Against Trafficking in Humans)—education modules for university students and staff to improve their ability to identify and respond to modern slavery in their fields (including social work, law, education, healthcare and university settings). The training can be tailored to the needs of specific sectors and is available to the broader community. Around 190 university staff have participated;
- *Developing and disseminating guidance and training materials to assist frontline workers, businesses and modern slavery survivors in taking a trauma-informed approach to preventing, identifying, and responding to modern slavery* (HerSpace)—a national guide, training module and other resources to support frontline workers in any discipline (including law enforcement) to implement a trauma-informed approach to preventing, identifying and responding to modern slavery;
- *Migrant Worker Modern Slavery Research Project, and Training for Evidence-Based Responses to Modern Slavery in Australia* (Migrant Justice Institute)—training on migrant workers' experiences of, and responses to, severe underpayment in Australia delivered to frontline workers including education providers and agents, government agencies, diplomatic missions and community service providers;
- *Strategies to Prevent (SToP) Modern Slavery* (Settlement Services International)—guidance, resources and tools for frontline workers, community leaders and religious leaders to improve awareness of modern slavery, its risk factors and avenues for reporting and support;
- *Identifying and assisting modern slavery victim-survivors presenting as patients or working in public hospitals* (St Vincent's Hospital Melbourne)—training to raise awareness and build capacity in the healthcare sector for potential survivors and migrant health staff through training and establishment of a peer group. It also aims to develop digital online modules with pilots delivered in two phases in Victoria and New South Wales; and
- *How to Optimise the Usability of an Emergency Department Modern Slavery Screening Process* (Sydney Local Health District)—education sessions for health professionals to build their capacity to identify and manage patients in situations of modern slavery.

Finally, indicators of modern slavery were promoted to frontline workers and the community more broadly during media campaigns for World Day Against Trafficking in Persons (see *Output 2* under *National Strategic Priority 1* above and action item 3 in the *Appendix*).

Output 2: Frontline responders participate in and complete education and training programs (both in Australia and overseas)

Despite the development and dissemination of education and training programs for Australian Government frontline respondents during the life of the National Action Plan (see output 1 of National Strategic Priority 2 and action item 13 in the *Appendix*), participation and completion rates for many of these programs could not be determined due to a lack of available data (see *Limitations*).

The LALD Program was estimated to have reached more than 140,000 members of Commonwealth, state or and territory agencies between 2019 and 2023 (AFP 2023). In May 2025, the ABF College assigned the LALD course to 2,033 ABF frontline officers for completion. At December 2024, 83 per cent of Pacific Labour Operations Division staff within the Department of Employment and Workplace Relations had completed the AFP's LALD training.

Frontline responders also participated in education and training programs developed and administered by recipients of the Modern Slavery Grants Program, as described under *Output 1* above and action item 33 in the *Appendix*.

Output 3: The National Policing Protocol to Combat Modern Slavery is implemented

The National Policing Protocol to Combat Modern Slavery (the National Policing Protocol) was drafted by the AFP in collaboration with all state and territory police agencies. The National Policing Protocol commits all Australian police agencies to a national framework to prevent, detect and respond to all forms of human trafficking and slavery. A key intent of this agreement is to ensure eligible victims of human trafficking receive the support they need and are referred by the AFP to the STPP. In March 2021, all Australian Police Commissioners, led by AFP Commissioner Reece Kershaw, signed and ratified the National Policing Protocol. The National Policing Protocol is described in further detail under action item 18 in the *Appendix*.

Output 4: Modern slavery cases are reported, investigated and prosecuted, where appropriate

The action items underpinning this output relate to the training of police officers, ABF officers, prosecutors, lawyers and related frontline workers, both in Australia and overseas, to facilitate the reporting, investigation and prosecution of modern slavery cases. Relevant initiatives are described under output 1 of Strategic Priority 2 above, and under action items 14 to 17 in the *Appendix*. Bilateral and multilateral capacity-building activities in an international context are detailed under action item 21 in the *Appendix*. These primarily relate to Australia's funding and co-management of the Bali Process Regional Support Office, a support mechanism for Bali Process members to engage in information sharing, capacity building and practical cooperation initiatives.

Data on matters that are reported, investigated and prosecuted are supplied by the NMDS (see action item 41 of the *Appendix*). The most recent NMDS report (Bricknell & McDonald 2025) describes the 371 modern slavery reports received by the AFP between 1 July 2024 and 30 June 2025, the characteristics of victim-survivors and perpetrators identified in these reports, the nature of government-funded support provided to victim-survivors and the outcomes of modern slavery prosecutions. Three-quarters (76%, $n=280$) of reports received by the AFP between 1 July 2024 and 30 June 2025 were accepted for investigation. Half of these 280 reports ($n=148$) were subsequently withdrawn as no modern slavery offence was identified. Of the 132 reports accepted for investigation and not withdrawn, 56 were subject to ongoing investigations at the time of publication, 52 were subsequently discontinued, eight were resolved through prevention and disruption activity, and two were referred to the CDPP for prosecution. Importantly, the AFP considers disruption and intervention outcomes that result in the prevention of a crime or the removal of victim-survivors from harm to be as significant as a successful prosecution (Lyneham 2021).

Output 5: The Australian Visa Framework and Divisions 270 and 271 of the *Criminal Code Act 1995 (Cth)* are reviewed and findings are communicated

During the life of the National Action Plan, the *Targeted review of Australia's visa framework to identify and reduce vulnerabilities to human trafficking and modern slavery* (Department of Home Affairs 2024) and the *Targeted review of Divisions 270 and 271 of the Criminal Code Act 1995 (Cth)* (Attorney-General's Department 2023) were both completed and findings were communicated through the publication of the final reports.

The *Targeted review of Australia's visa framework to identify and reduce vulnerabilities to human trafficking and modern slavery* was undertaken by Home Affairs (see action item 20 in the *Appendix*). The review found that Australia's migration program and supporting visa system are substantially effective in regulating the entry, stay and departure of non-citizens, and in identifying human trafficking indicators. It also found opportunities to increase the likelihood of identification of suspected victims for referral to the AFP and/or support providers. These include: increasing the scope of training provided to Home Affairs and ABF officers; capitalising on community outreach activities; identifying possible changes to policy, procedures and systems; and considering relevant legislative changes.

The *Targeted review of Divisions 270 and 271 of the Criminal Code Act 1995 (Cth)* was undertaken by AGD (see action item 19 in the *Appendix*). The review identified areas for possible legislative change to strengthen Australia's modern slavery offences in line with international good practice, to better reflect growing understanding about what modern slavery looks like and how it takes place in the Australian context, and to further future-proof Australia's offences so they remain flexible enough to apply to new and emerging forms of modern slavery.

Implementation successes, limitations and challenges

Stakeholders recognised the delivery of training and resources for frontline responders as critical to the successful identification of people experiencing or at risk of modern slavery. To this end, stakeholders were broadly positive about the substantial focus on training for frontline responders within the National Action Plan, and efforts to implement appropriate training programs. However, stakeholders also noted some broad limitations in the implementation of training initiatives. Specifically, stakeholders indicated their concern that training programs had generally not evolved or expanded significantly beyond existing approaches over the life of the National Action Plan. Further, stakeholders felt that training was often delivered infrequently and, depending on the course, there were limited spaces available. Given the high staff turnover in some frontline agencies, stakeholders spoke about the ongoing risks of insufficient or inconsistent levels of training in frontline workforces. Further, concerns were raised that training programs may be limited in their reach, with a lack of training delivered or available across states and territories and in regional locations.

“

You can talk to a frontline officer and they wouldn't have been briefed on [modern slavery] for three years. And human trafficking changes and the trends change ... and indicators change and it's always good to have that refresher. (Consultation 1, Government: Law Enforcement and Regulation)

[Police] don't even necessarily know what each other's doing or what's available within their own systems. [The LALD Program is a] great training course, but I don't know how many frontline [state and territory] police in regional and rural areas have done it. Australia's a big place and often these people are really spread out ... I think it's something that stymied some of the progress, if that makes sense. (Consultation 29, Civil Society)

In response to these concerns, stakeholders suggested that training could be improved by requiring completion on a regular basis and involving people with lived experience and those vulnerable to exploitation in the co-design and delivery of training programs (see Dowling 2024 for a discussion of this in the context of police training in responding to family, domestic and sexual violence).

“

The training part is probably partially successful, but ... the next stage needs to happen around people with lived experience working together with police to develop training. That's really going to change the way the experiences of people who are survivors experience interacting with police in the justice system and whether they are taken seriously, whether they're treated well, whether they get to an investigation stage ... (Consultation 29, Civil Society)

Stakeholders acknowledged that these improvements could only be made through sufficient resourcing to develop and implement training programs.

“

It seems like the NAP [National Action Plan] had a pretty heavy leaning on operational delivery, resources, fact sheets, translations, online tools, and those things can be incredibly hard to deliver without dedicated funding. (Consultation 22, Government: Policy and Programs)

As mentioned, a stocktake of modern slavery training initiatives, undertaken by ThinkPlace and finalised in 2024, found that, while there was good coverage of training needs for Australian Government frontline responders, there were notable gaps at the state and territory level. Further, while a high number of training initiatives were identified for frontline workers across most sectors, there was an identified need for more pre-service training (ie training prior to commencing in a frontline role); greater national consistency in the training available to frontline workers in certain sectors such as education, healthcare and community service workers; and easier access to refresher materials and central repositories for best practice resources and online courses that frontline workers can use on-the-job. Additionally, the stocktake recommended more extensive use of train-the-trainer models for hard-to-reach groups. Finally, it recommended greater national collaboration in the development and delivery of training. Documentation under action item 13 details initiatives to address these gaps (see *Output 1* and *Output 2* of National Strategic Priority 2 above), although there is limited information available to gauge the extent to which Australian Government staff and state and territory police participated in those training initiatives. It is nonetheless encouraging that training programs, particularly the LALD Program, continue to expand their reach to many agencies who may have contact with victims of modern slavery.

Beyond training, some stakeholders reflected on the implementation of the National Policing Protocol. Specifically, these stakeholders were concerned about the lack of transparency around what is contained within the protocol. They reflected on ongoing limitations in collaboration between Commonwealth and state and territory police agencies during the investigation and prosecution of modern slavery cases.

“

I think there is a lack of visibility of the processes ... and a clear example is the Policing Protocol. We all know that it exists, but nobody knows what the protocol says. So we continue to experience the same challenges without knowing if they are addressed in the Protocol. (Consultation 32, Civil Society)

Finally, stakeholders reflected on the implementation of the *Targeted review of Divisions 270 and 271 of the Criminal Code Act 1995 (Cth)* and the *Targeted review of Australia’s visa framework to identify and reduce vulnerabilities to human trafficking and modern slavery*. Stakeholders praised the breadth of scope and extensive consultation and collaboration that underpinned the *Targeted review of Divisions 270 and 271 of the Criminal Code Act 1995 (Cth)*. In comparison, they were concerned that the *Targeted review of Australia’s visa framework to identify and reduce vulnerabilities to human trafficking and modern slavery* was limited in scope and did not sufficiently incorporate the perspectives of civil society and people with lived experience, so was not implemented in a manner that could facilitate meaningful change.

“

The *Targeted review of Australia’s visa framework to identify and reduce vulnerabilities to human trafficking and modern slavery* was undertaken, but it didn’t comprehensively review the HTVF. We’ve been raising concerns for years about the HTVF and that it’s not currently meeting the needs of survivors of modern slavery. But that would have been a really good opportunity to actually review it with government. (Consultation 32, Civil Society)

Overall, stakeholders reflected positively on efforts to implement training programs for frontline officers. However, they were concerned that these efforts were limited by training programs that were delivered infrequently, were not accessible across states and territories, were not mandatory and did not involve people with lived experience in their development or delivery. These findings were supported by the training needs analysis undertaken by ThinkPlace. Stakeholders were particularly complimentary of the collaborative and transparent way in which the *Targeted review of Divisions 270 and 271 of the Criminal Code Act 1995 (Cth)* was conducted, and suggested that the *Targeted review of Australia’s visa framework to identify and reduce vulnerabilities to human trafficking and modern slavery* could have been improved if it had been carried out similarly.

Outcomes

Stakeholders indicated that they were generally confident that awareness of modern slavery had improved among law enforcement officers, and that officers had become better able to identify and appropriately refer suspected cases of modern slavery. This was primarily attributed to the implementation and uptake of training programs.

“

The first step is identification and it's easy to miss, but that's a major need of vulnerable groups and all victims of trafficking. They're not going to get any help if they can't be identified. So ... indicators and training ... [are] critically important and it really is the first step and I think [the National Action Plan] does meet those needs. (Consultation 8, Government: Law Enforcement and Regulation)

There's just not that broad awareness across sectors and communities really about modern slavery and I see that the [National Action Plan] has actually helped that in the last few years because there has been a lot of those activities in this current [National Action Plan] around providing more information or raising awareness or training of frontline workers. The way that I've seen that make a difference is through the really quite significant growth in terms of identifying victim-survivors that are being referred onto the STPP ... I think that's partly attributed to some of the actions by other agencies [in] raising awareness and doing the frontline worker training. (Consultation 20, Government: Policy and Programs)

Through the emphasis on training frontline workers, I've seen that direct impact in identifying the fact that frontline workers are really important. That has then led to more identification and better support for victim-survivors. (Consultation 29, Civil Society)

[Training] has some benefit, maybe get some more prosecutions up and maybe victim-survivors who go through legal systems in other places get a better deal ... I think there is training [that] actually does create a better empathy towards the survivors and therefore better outcomes in that judicial process. (Consultation 42, Civil Society)

Data from the AIC’s NMDS demonstrates an improvement in the identification of modern slavery, with the number of reports received by AFP increasing by 32 percent between 2022–23 ($n=281$) and 2024–25 ($n=371$; see Table 10). Of relevance to National Strategic Priority 2 was the increase in reports made by frontline agencies, particularly state and territory police, state and territory child protection agencies and schools and education facilities. There was, however, a decrease in reports made by ABF, and NGOs, although the latter may reflect the introduction of the ARP, which allowed victims and survivors to be referred to the STPP without having to engage with the AFP (see *National Strategic Priority 3* below).

Table 10: Reports of modern slavery by referral source, 2022–23 and 2024–25

	2022–23		2024–25	
	<i>n</i>	%	<i>n</i>	%
Australian Federal Police ^a	17	6.1	5	1.4
Australian Border Force	52	18.5	47	12.7
Department of Home Affairs	1	0.4	5	1.4
Department of Foreign Affairs and Trade	6	2.1	5	1.4
Fair Work Ombudsman	4	1.4	4	1.1
State/territory police	24	8.5	37	10.0
State/territory child protection agency	13	4.6	26	7.0
Hospital/health facility	8	2.8	10	2.7
School/education facility	16	5.7	27	7.3
Non-government organisation	39	13.9	31	8.4
Member of the public	22	7.8	120	32.4
Victim-survivors (self-referral)	8	2.8	41	11.1
International (eg Interpol)	0	0	8	2.2
Other	13	4.6	5	1.4
Unspecified ^b	58	20.6	0	0
Total reports	281		371	

a: Alleged offences detected by the AFP, such as through proactive policing

b: Unspecified reports to the AFP, such as where a report is made anonymously via webform, letter or phone call

Note: Information on referral source is based on data provided to the NMDS by AFP. Percentages may not total 100 due to rounding

Source: Bricknell & McDonald 2025; McDonald & Bricknell 2025

Despite these findings, many non-government stakeholders and people with lived experience felt that improvements in law enforcement officers' awareness of modern slavery were not noticeable in practice. These stakeholders were concerned that identifying modern slavery still relied on victims' ability and willingness to report their own experiences to law enforcement, which may be limited for many reasons (eg lack of awareness of the concept of modern slavery or distrust of law enforcement). Relatedly, stakeholders reflected on the inconsistency in the extent to which law enforcement applied trauma-informed and victim-centred practices when interacting with suspected victim-survivors of modern slavery.

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Even taking statements is an extremely traumatic activity for people to take part in. And if it goes to investigation, that's amazing, if it gets to prosecution ... That is just so traumatic to go through. And they tell me exactly why it's traumatic and it is lots of things around the practices, but also the disjointed systems between state and federal, the confusion, the lack of communication, very bad experiences with police previously where they've actually been victims of police brutality, and of course, always the fear if it's a visa situation. You are completely powerless and hardly anybody's in your court. (Consultation 39, Civil Society)

We're ... extremely concerned around the cross-purposes that seem to be in play at the moment in regards to visa compliance activities and supporting migrant workers. [There are] currently high levels of raids on the workplaces of Asian migrant sex workers and this forces Asian migrant sex workers to work in more hidden ways in order to avoid these raids. And of course, we know that when people work in more underground or hidden areas that that opens up opportunities for exploitation and potential trafficking and modern slavery offences. In this way law enforcement are creating the very environment the National Action Plan seeks to prevent, and all in the name of 'finding' victims. (Consultation 40, Civil society)

Most of the time the first point of contact will be the police, but [victims] will never come to you and say 'I'm a victim of trafficking' or 'I'm a victim of debt bondage'. We don't know the names of these crimes, we'll just come and give you a story. They need to be very fast to pick the signs ... But they were completely dismissive and maybe because they do not have awareness. I think frontline workers, they need a lot of training including police and nurses. I think Australia's responses, most of the times they are criminal and compliance focused. They are not survivor centred (Consultation 46, Person with lived experience).

People with lived experience of modern slavery similarly reflected on issues related to how frontline officers engage with victim-survivors during the investigation and prosecution of modern slavery. Notably, few people with lived experience consulted as part of this evaluation felt police or prosecutors supported them to understand the criminal justice process, or to ensure their safety and wellbeing while engaged with the criminal justice process.

“

Initial statements taken poorly, lack of interagency collaboration, investigative delays, lack of understanding of legislation, lack of communication, long delays ... (Consultation 51, Person with lived experience)

The police were abysmal. When the federal agents came to collect me for an interview—with sidearms—one of them said ‘I thought you’d be Asian’. He was fresh out of the counter-terrorism unit, appeared to know less about [human trafficking] than I did ... He put me through an hours long interview without offering me even a drink of water and was texting back and forth with his mate to organise drinks and sharing his marital problems with me. It was a horrible experience. (Consultation 49, Person with lived experience)

I was trying to describe what was happening [to police] and it wasn’t very successful. The police were very interested in my visa status. Once they knew I was an international student, they asked me how many hours per week I was working, which is completely irrelevant when you’re reporting either sexual violence or exploitation. They also asked me if I was doing my taxes, which again is completely irrelevant. And I reported to police on several occasions. (Consultation 48, Person with lived experience)

They could have met me in a proper office, at the local police station for example. I would have preferred having to deal with female officers. They need to be more professional and work in a trauma-informed approach. (Consultation 52, Person with lived experience)

In contrast, other people with lived experience and civil society stakeholders spoke about positive experiences with police. They discussed officers being open-minded and understanding, victim-survivors’ needs being met (including through referrals to relevant support services) and interactions being underpinned by trauma-informed practices (see also Doherty & Dowling 2026).

Overall, some stakeholders suggested that the National Action Plan over-prioritised training completion and that there was insufficient focus on outcomes (eg improvements in the identification of modern slavery and better outcomes for people with lived experience of modern slavery).

“

I think it's a heavy, heavy focus on training, but it doesn't focus on ... 'these are the things that we expect you to be doing differently'. If that training is working, then I would expect more outcomes [and] higher detection. (Consultation 14, Government: Other)

There's very strong sort of numbers around training and engagement [in an international context] and raising this as an issue of significance in our neighbouring countries ... but there are no measures of how that's actually working, at a really base level for the beneficiaries whom we're doing our casework with. (Consultation 35, Civil Society)

In reflecting on outcomes related to collaboration between criminal justice actors, stakeholders broadly felt that the National Policing Protocol had facilitated further engagement and the identification of opportunities for joint action, particularly between state and territory police and the AFP. However, some stakeholders suggested that there may be opportunities to strengthen partnerships established or developed under the National Action Plan, such as by ensuring that all agencies have clearly defined responsibilities and that there is ongoing communication about cases.

“

There's really no feedback loop as well in terms of the referrals to AFP ... We are constantly referring things that we think might be indicators, but not everything they consider to be related to human trafficking ... We don't want to be creating work, but if there's a mechanism for us to keep that closed learning loop, then it would certainly benefit all of us. (Consultation 3, Government: Law Enforcement and Regulation)

Identification, disruption and prevention ... sits entirely with the AFP ... I think that [others can] shoulder some of that responsibility as well. That would then give further prioritisation within [other Commonwealth law enforcement and regulatory agencies] as well as potentially state police ... my general observation is I think that we could work more hand in hand to shoulder more of that responsibility. (Consultation 2, Government: Law Enforcement and Regulation)

A small number of stakeholders also suggested alternative or additional approaches to collaboration that could be more effective, such as joint taskforces (see also Doherty & Dowling 2026).

“

If you're in a joint agency task force under one command with other agencies, investigators and intelligence working with you, then you have the ability to go off and deal with it immediately without having to negotiate support. At the minute we're in the world of negotiation and request [through the National Policing Protocol] rather than tasking. (Consultation 4, Government: Law Enforcement and Regulation)

Another intended outcome of this National Strategic Priority was that the Australian Visa Framework and Divisions 270 and 271 of the *Criminal Code Act 1995 (Cth)* would be amended as appropriate in accordance with the findings from the relevant reviews. Some stakeholders and people with lived experience indicated their concern that none of the recommendations, which were seen as essential to improving justice outcomes, had been implemented by the end of the National Action Plan. Two participants said of the *Targeted review of Divisions 270 and 271 of the Criminal Code Act 1995 (Cth)*:

“

It was completed, but none of the recommendations have been implemented, so I couldn't point to anything that's come out of the National Action Plan that has addressed that justice responses are effective and perpetrators are held to account ... [It] doesn't feel like a lot of progress has been made. (Consultation 42, Civil Society)

... that's massive [and may contribute to] potentially significant legislative reform, which I think is desperately needed, at least from a point of view of simplifying the legislation and getting better prosecution outcomes. (Consultation 8, Government: Law Enforcement and Regulation)

Importantly, the Australian Government has indicated its intention to develop potential legislative reforms to address the findings of the *Targeted review of Divisions 270 and 271 of the Criminal Code Act 1995 (Cth)* (AGD 2023). At the time of writing, the AGD were undertaking targeted consultations on technical aspects of potential legislative amendments, in line with the government's response.

Stakeholders also reflected on the operation of Australia’s legal and visa frameworks as they relate to modern slavery. In particular, stakeholders and people with lived experience noted the low number of modern slavery prosecutions in Australia. Between 2004 (when relevant modern slavery offences were introduced) 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). Encouragingly, recent data from the NMDS shows an increase in the number of investigations, prosecutions and convictions. 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). Perpetrators may also be investigated and prosecuted for offences under other legislation, such as the *Migration Act 1958* (Cth) or state and territory legislation. While this may provide additional avenues for investigation and prosecution, doing so may also prevent such offences from being recorded in official crime statistics (see Doherty & Dowling 2026). Importantly, some stakeholders and people with lived experience noted the importance of examining trends in attrition alongside trends in prosecutions, to understand how criminal justice processes (eg evidence collection or engagement with victims) can be reformed to improve the likelihood of prosecutions.

In reflecting on criminal justice outcomes associated with the National Action Plan, some stakeholders suggested that a future response could be more effective if it had a greater focus on how people with lived experience access and experience the criminal justice system, and achieve justice more broadly, rather than the current emphasis on obtaining convictions:

“

Justice looks different for different people. Not everyone wants to go through the whole court process. It’s really, really draining. Some people, their perpetrators [are] their families, their mothers, it’s their fathers, it’s their sister. They don’t want to take them to court. Respect that support should not be attached to the criminal justice system ... You don’t need to be involved in prosecution to be to be supported. So there’s still a lot I think we really need to do. (Consultation 46, Person with lived experience)

... the message from the victims was that justice does not mean for victims what we would instinctually think that it means. It’s not saying somebody must be convicted necessarily ... The core process isn’t ideal for everybody ... So I think making sure that we have a large toolkit of options for people to receive help and also to receive justice. (Consultation 8, Government: Law Enforcement and Regulation)

We’re measuring success on the wrong set of data and I do really feel like that is something that the [National Action Plan] can guide. I think if we change the narrative around what we’re looking for, what is a safer society? What is a society where vulnerable groups are less at risk? It’s not that we’ve made more prosecutions. That’s not how we determine success. (Consultation 31, Civil Society)

While not directly relevant to the outcomes associated with this action item, a number of stakeholders and people with lived experience of modern slavery commented on implications of Australia's visa framework for how victim-survivors access and experience the criminal justice system. Crucially, people with lived experience spoke about the fear of visa cancellation as a reason for not reporting, as well as a reason police may discredit their experiences.

“

I've heard stories of other people who like reported to the police about something, but then they were laughed out of it or the police didn't take them seriously ... Another issue with going to the police is if the police find you of any wrongdoing, then my visa gets cancelled, so I don't want to take that chance. (Consultation 45, Person with lived experience)

We went to the police and I officially made a statement ... of what happened, how we met, being very honest. After that, what they concluded, they said I was scared of ... my visa situation because I'm scared of being deported ... and they dismissed the case. (Consultation 46, Person with lived experience)

In addition, some stakeholders and people with lived experience felt that victim-survivors were unable to obtain visas in a timely, accessible and trauma-informed manner due to the requirement to cooperate with law enforcement, delays and uncertainty associated with bridging visas, and the inability to access employment or support while on some visas.

“

I think [something is needed] around reviewing the effectiveness of the Workplace Justice Visa, for example. Related to that, I would like to see an action that is focused on the [HTVF] and it may be that those two initiatives could be combined in the National Action Plan. But clearly people are missing out. (Consultation 30, Civil Society)

You shouldn't link a trafficking visa to a police investigation. That's not a good system [and] so inaccessible that the majority of victim-survivors are not put onto this pathway. Sometimes there are options such as the asylum seeker type of visas, but again, it's not always [viable] and it's not trafficking specific ... It also means you're never allowed to leave Australia while you're applying for this visa. So there's now the Workplace Justice Visa ... which is supposed to only be for like exploitation that doesn't reach modern slavery. But the [HTVF] is so bad that the one-year Workplace Justice Visa is the better pathway. (Consultation 48, Person with lived experience)

Over the life of the National Action Plan there has been an increase in awareness of modern slavery among frontline agencies, and improvements in the identification and prosecution of modern slavery. However, non-government stakeholders and people with lived experience were concerned that these changes have not resulted in better justice and safety outcomes for all victims and survivors navigating the criminal justice system. Stakeholders suggested that future work towards these outcomes should include:

- a focus on intended outcomes of training for frontline officers;
- consistent application of trauma-informed and victim-centred practices in the investigation of modern slavery;
- consideration of best practices for ongoing collaboration between agencies; and
- improvement of Australia's visa framework, particularly the HTVF.

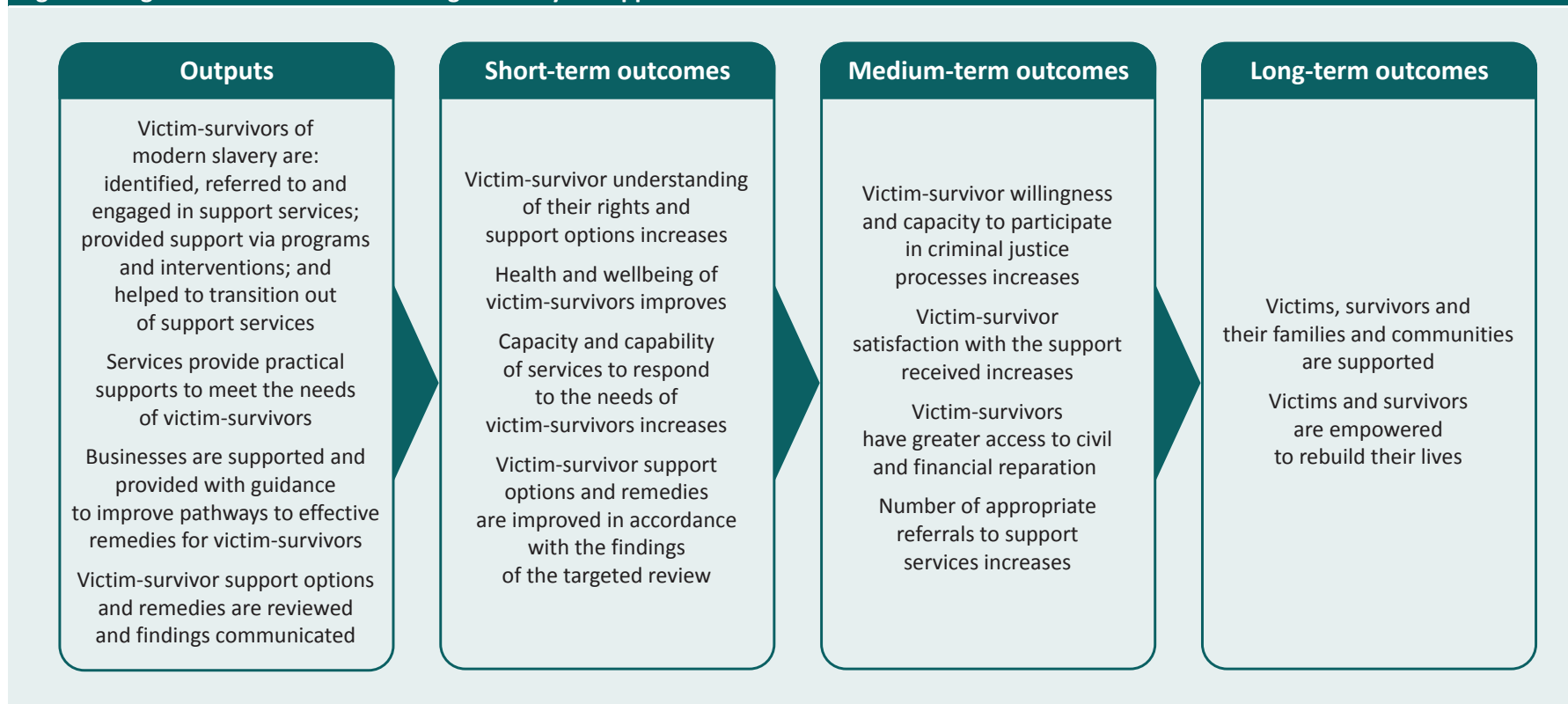
National Strategic Priority 3: Support and protect

Meeting the needs of victim-survivors of modern slavery was a fundamental priority of the National Action Plan. A goal of the National Action Plan was to empower individuals affected by modern slavery to rebuild their lives through increased access to support services. It further intended to ensure effective engagement with civil society organisations and businesses involved in responding to modern slavery to facilitate access to essential services to support and protect victim-survivors.

The logic model for National Strategic Priority 3 (see Figure 8) articulates how action items were intended to contribute to the two relevant longer-term outcomes articulated in the National Action Plan:

- victims, survivors and their families and communities are supported; and
- victims and survivors are empowered to rebuild their lives.

Figure 8: Logic model for National Strategic Priority 3: Support and Protect



Implementation

This section assesses the implementation of action items under National Strategic Priority 3, how they contributed to outputs specified in the evaluation framework, and implementation successes, limitations and challenges. Action items were expected to result in the following outputs:

1. Victim-survivors of modern slavery are: identified, referred to and engaged in support services; provided support via programs and interventions; and helped to transition out of support services;
2. Services provide practical supports to meet the needs of victim-survivors;
3. Businesses are supported and provided with guidance to improve pathways to effective remedies for victim-survivors; and
4. Victim-survivor support options and remedies are reviewed and findings communicated.

Action items contributed to the outputs under this National Strategic Priority as per Table 11.

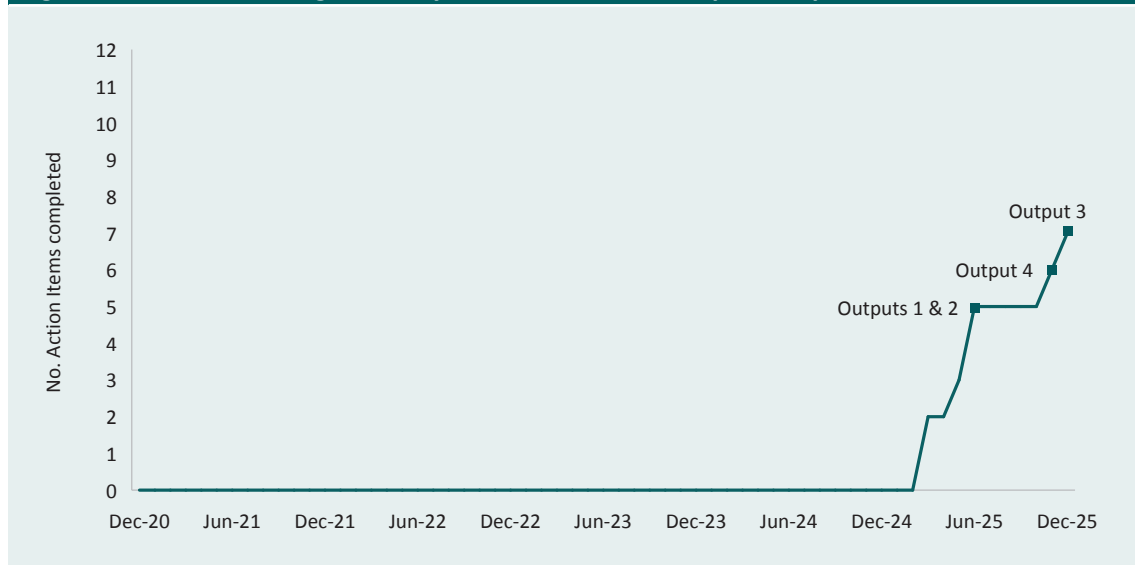
Table 11: Action items against National Strategic Priority 3 (Support and protect) and their contribution to relevant outputs				
Action item	Output			
	1	2	3	4
Action item 22: Develop and distribute factsheets and resources on available support services and pathways to accessing support				
Action item 23: Develop a model for enhanced civil protection and remedies for individuals in, or at risk of, forced marriage				
Action item 24: Implement the <i>Protocol for the treatment of children suspected as victims of human trafficking, slavery or slavery-like practices</i>				
Action item 25: Provide practical support and guidance to NGOs who are supporting victims and survivors, including through updating the <i>Guidelines for NGOs: Working with trafficked people</i>				
Action item 26: Undertake a targeted review of support and legislative protections, defences and remedies available to modern slavery victims and survivors, particularly women and children, taking into account existing reviews and inquiries				
Action item 27: Undertake a review of state and territory victims of crime financial assistance schemes and their availability to victims and survivors of modern slavery				
Action item 28: Support businesses to improve pathways to effective remedies for victims and provide effective remediation in instances of modern slavery, through guidance and awareness-raising activities				

Note: Progress made under each action item is detailed in the *Appendix*

Source: Australian Government 2020

Many stakeholders reflected on the timeframes for delivery of action items under the National Action Plan. Timeframes for completion of outputs and action items under this National Strategic Priority are summarised in Figure 9. All action items and outputs under this National Strategic Priority were completed in the final year of the plan.

Figure 9: National Strategic Priority 3 action item and output completion timeline



Source: AIC Evaluation of the *National Action Plan to Combat Modern Slavery 2020–25*

Outputs achieved under National Strategic Priority 3

Output 1: Victim-survivors of modern slavery are: identified, referred to and engaged in support services; provided support via programs and interventions; and helped to transition out of support services

Over the life of the National Action Plan, a number of resources were published that aimed to help those who were experiencing or at risk of modern slavery to access relevant support services (see action item 22 in the *Appendix*). These resources included:

- the Modern Slavery in Australia website (Australian Government 2024), which provides information on how individuals can access support if they are in or at risk of modern slavery, as well as how frontline workers and community members can support someone who is in or at risk of modern slavery;
- factsheets and resources on the STPP and how to access it (ie by engaging with the AFP or support services as part of the ARP), which are published on the DSS website; and
- Anti-Slavery Australia’s My Blue Sky website (Anti-Slavery Australia 2022), which provides information on how individuals can access support if they are at risk of forced marriage, if they are concerned for someone they know, or if they are frontline workers, including by providing access to interpreters.

The Australian Government also developed the *Practice guidelines for organisations: Working with people in or at risk of modern slavery* in consultation with people with lived experience of modern slavery and individuals and organisations working in the sector. This was published on the Modern Slavery in Australia website in 2025 (National Roundtable on Human Trafficking and Slavery 2025).

Support for victims and survivors of modern slavery is primarily provided through the STPP and the FMSSP. These programs assist victims and survivors of modern slavery to meet their safety, security, health and wellbeing needs, and to develop options for life after they exit these programs. The most recent data from the NMDS (Bricknell & McDonald 2025) indicate that 152 victims and survivors were referred to the STPP in 2024–25, and 63 were referred to the FMSSP. Further information on the nature of support provided is available in the NMDS report (Bricknell & McDonald 2025).

Work to identify victims and refer them to support services was also undertaken by grant recipients under the Modern Slavery Grants Program (see action item 33 in the *Appendix*):

- *Let's talk: A holistic approach to preventing forced marriage within the Muslim community* (Australian Muslim Women's Centre for Human Rights)—offered individualised sessions for parents or families who wanted to discuss issues around marriage plans for their children;
- *Work Right Hub* and *Work Right Hub 2.0* (Australian Red Cross)—developed referral pathways and resources, including in community languages, to inform migrants and frontline workers how and where to access support services;
- *Safe and Empowered Families: A forced marriage prevention program* (Good Shepherd Australia New Zealand)—developed, trialled and evaluated an innovative international model of support for preventing forced marriage in Australia which involved mediation for young people and their families and referral to other support services;
- *Honour My Choice* (Taldumande)—provided case work support to 16 young people affected by forced marriage between 2021 and 2023, referred through outreach initiatives delivered to schools and support services;
- *Educating for Change: Preventing and responding to modern slavery amongst university students in pre-service courses* (Australian Catholic Religious Against Trafficking in Humans)—provided information about responding to modern slavery and referring victims and survivors to appropriate support, as well as avenues for training participants to access support themselves as required;
- *Developing and disseminating guidance and training materials to assist frontline workers, businesses and modern slavery survivors in taking a trauma-informed approach to preventing, identifying, and responding to modern slavery* (HerSpace)—developed resources on psychoeducation for survivors that aimed to assist them to understand their trauma, its impacts, the journey to recovery and the benefits of therapeutic support;
- *Migrant Worker Modern Slavery Research Project, and Training for Evidence-Based Responses to Modern Slavery in Australia* (Migrant Justice Institute)—empowered at-risk migrant workers who participated in their survey by providing immediate tailored information on legal protections, reporting and support to those who reported modern slavery indicators;

- *Worker Led Empowerment (Project Respect)*—provided support to survivors engaged with the economic empowerment program through access to debriefing, a counselling program and transport to facilitate participation;
- *Strengthening and connecting survivor voices in Australia (Salvation Army)*—created a peer support and development program for members of the Lived Experience Engagement Program;
- *Strategies to Prevent (SToP) Modern Slavery (Settlement Services International)*—developed guidance, resources and tools to support vulnerable individuals and communities at risk of modern slavery to improve awareness of their rights, including avenues for reporting and support;
- *Identifying and assisting modern slavery victim-survivors presenting as patients or working in public hospitals (St Vincent’s Hospital Melbourne)*—educated healthcare practitioners to ensure that patients in or at risk of modern slavery are identified and referred to appropriate care and support; and
- *How to Optimise the Usability of an Emergency Department Modern Slavery Screening Process (Sydney Local Health District)*—developed and trialled a screening tool for use in emergency departments to improve the identification of migrants in or at risk of modern slavery.

Output 2: Services are provided with practical supports to meet the needs of victim-survivors

Throughout the life of the National Action Plan, the Australian Government developed a number of guidelines to support services to meet the needs of victims and survivors of modern slavery. These included:

- the *Protocol for the treatment of children with lived experience of human trafficking, slavery or slavery-like practices* (see action item 24 in the *Appendix*), which outlines guiding principles, roles and collaborative arrangements for supporting children who have experienced human trafficking, slavery or slavery-like practices;
- the *Practice guidelines for organisations: Working with people in or at risk of modern slavery* (see action item 25 in the *Appendix*); and
- *Modern slavery lived experience engagement and empowerment* (see action item 31 in the *Appendix*), which sets out values, principles and practical guidance to help organisations to engage with and empower people with lived experience in a safe, ethical and trauma-informed manner.

In addition, the STPP Communications Manual was updated by DSS (described under action item 13 in the *Appendix*). The STPP Communications Manual provides guidance to non-government organisations (NGOs) on victim-survivor welfare and coordination of support to victims.

Output 3: Businesses are supported and provided with guidance to improve pathways to effective remedies for victim-survivors

Support for businesses to improve pathways to effective remedies was primarily achieved by developing the Modern Slavery Remediation Toolkit. The toolkit provides guidance businesses in developing their modern slavery remediation policies and improving pathways to effective remediation. It was developed by AGD in consultation with people with lived experience of modern slavery, and government and non-government stakeholders. The toolkit was published on the Modern Slavery Statements Register (AGD 2026) alongside additional guidance on compliance and good practice trends for businesses (see also action items 5, 6 and 46 in the *Appendix*).

More broadly, the Australian Government continually engaged with businesses throughout the life of the National Action Plan to provide information and guidance on the *Modern Slavery Act 2018*, which requires business to describe actions taken to assess and address identified modern slavery risks. For example, the Australian Government published *Commonwealth Modern Slavery Act 2018: Guidance for reporting entities* and tailored guidance notes on identified compliance and good practice trends; see action item 6 in the *Appendix*.

Businesses were also provided with guidance about effective remedies for victims and survivors during the Modern Slavery Conference 2023 (described under action item 37 in the *Appendix*). This conference was themed ‘Taking action together’ and focused on cross-sector collaboration and partnership to strengthen modern slavery responses. The conference explored topics including modern slavery trends and estimates, people-centred and people-led responses, ethical recruitment, responsible sourcing and procurement, and remedy.

Further work was also undertaken by grant recipients under the Modern Slavery Grants Program (see action item 33 in the *Appendix*):

- *Modern Slavery Impact Initiative* (Global Compact Network Australia)—provided information to business, including on identifying and remediating modern slavery, through a series of forums, training modules and resources;
- *Improving the Regulation of Modern Slavery and Access to Remedy: Learning from Experience* (UNSW Sydney)—engaged reporting entities to the *Modern Slavery Act 2018* interested in strengthening business practices to identify modern slavery risk and implement remedy through the publication of reports including *Good practice toolkit: Strengthening modern slavery responses*, which examined best practice examples of remediation (Nolan et al. 2023); and
- *Migrant Worker Modern Slavery Research Project, and Training for Evidence-Based Responses to Modern Slavery in Australia* (Migrant Justice Institute)—provided recommendations to government on how to ensure that migrant workers who have been underpaid are able to access remedy in their report *Off the books: Inside Australia’s hidden system of migrant worker exploitation* (Berg & Farbenblum 2026).

Output 4: Victim-survivor support options and remedies are reviewed and findings communicated

During the life of the National Action Plan, two relevant reviews were finalised, including a targeted review of support and legislative protections, defences and remedies available to modern slavery victims and survivors (see action item 26 in the *Appendix*); and the *Overview of state and territory victims of crime financial assistance schemes and their availability to victims and survivors of modern slavery* (AGD 2025b; see also action item 27 in the *Appendix*).

The targeted review of support and legislative protections, defences and remedies available to modern slavery victims and survivors identified four opportunities for improvement. These related to research, information dissemination, training for frontline responders and systems to support people in or at risk of modern slavery overseas. This report was disseminated within the Australian Government for consideration and implementation as appropriate.

The *Overview of state and territory victims of crime financial assistance schemes and their availability to victims and survivors of modern slavery* summarised the schemes currently in place and examined differences in thresholds and definitions that may impact the assistance they can offer. The report also highlighted differences in the amounts of financial assistance, types of supports available and time limitations for making a claim between state and territory schemes. Finally, it identified that supports available to victims and survivors to help them understand and access financial assistance differ between schemes. This report was published by AGD (2025b).

The Australian Government also developed options for a model to enhance available civil protections and remedies to prevent and respond to forced marriage (see action item 23 in the *Appendix*). Two models were developed: integrating enhanced protections into relevant state, territory and Commonwealth family and domestic violence frameworks; or establishing enhanced protections through Commonwealth legislation. These were subject to a three-month public consultation. A high-level summary was published on the AGD website in late 2024. At the time of writing, work is underway to determine the final model.

Separately to these reviews, DSS enhanced the STPP in 2023, in response to existing reviews, inquiries and stakeholder feedback. These enhancements included:

- increasing the minimum period of support from 45 days to 90 days for all identified victim-survivors;
- ensuring financial support for visa holders unable to access Centrelink payments matches the rate of Special Benefit payment;
- providing additional support for victim-survivors with dependants; and
- introducing 'post-exit check-ins' at three, six and 12 months after leaving the program.

In addition, the Government agreed to implement an ARP pilot to enable referral to the STPP without having to first engage with the AFP. This pilot and an independent evaluation were funded under the 2023–24 Budget. The ARP pilot commenced in July 2024.

Implementation successes, limitations and challenges

Stakeholders identified several positive developments in the provision of support and protection to victim-survivors of modern slavery. In particular, the establishment of the ARP was widely praised for expanding access to support by enabling more people with lived experience to engage with the STPP. The ARP removed a key barrier to the STPP by allowing victims to be referred without first reporting to the AFP. Stakeholders observed that the ARP also facilitated increased collaboration and partnership across a broader range of service providers, contributing to improved coordination, enhanced information sharing and a more streamlined experience of accessing support. Improved access to the STPP enabled more individuals to receive trauma-informed support.

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The introduction of the Additional Referral Pathway and the Forced Marriage Specialist Support Program are also really significant improvements in moving towards a more rights-based response to modern slavery in Australia, because previously having all formal national government-funded support linked to criminal justice processes was not rights based, and certainly contributed to the low identification of victim-survivors in general. (Consultation 38, Civil Society)

What worked really, really well for survivors from the sex industry was when the Additional Referral Pathway was still funded to small organisations, for example, Project Respect. We were able to get every single sex industry survivor onto the program ... because they are really trauma informed and they give you case management at the same time. But now they have been defunded, so we are back to just Salvation Army and Anti-Slavery Australia which doesn't work for everyone. (Consultation 48, Person with lived experience)

Stakeholders also observed progress in the adoption of more trauma-informed approaches to service delivery more broadly. This was attributed, in part, to the development of the *Practice guidelines for organisations: Working with people in or at risk of modern slavery* (National Roundtable on Human Trafficking and Slavery 2025). While previous versions of the guidelines were primarily targeted at NGOs, their expansion to a broader, multi-sector audience was viewed positively, reflecting the wide range of actors who may engage with victim-survivors. The guidelines are intended to support any individual or organisation that works with, or may need to identify, support or engage with, people who have experienced modern slavery. This includes support services as well as sectors not traditionally associated with service delivery, such as business, education and academia, and the media.

The HTVF was also viewed as a key mechanism for improving support and protection outcomes for victim-survivors.

“

I think probably the main [achievement of the National Action Plan] would be the visa framework in the sense that ... [suspected victim-survivors can] get referred onto the support for people program as well as then be referred for a bridging visa if applicable to that person ... I think that's very effective in terms of resolving peoples' status ... It enables people to receive a visa that normally they wouldn't be able to receive, for the most part, and it just really takes away that key vulnerability for people. (Consultation 2, Government: Law Enforcement and Regulation)

Despite these improvements, stakeholders and people with lived experience identified several limitations in the current support framework, particularly in relation to the extent to which it can be considered victim-centred. First, the STPP continues to operate primarily as a crisis and short-term support program, with limited provision for longer-term recovery needs. Stakeholders emphasised that effective support and protection for victim-survivors extends beyond immediate assistance and should include longer-term support options, access to restitution or compensation, and civil protections and remedies (see also Doherty & Dowling 2026).

“

There is still not enough done through the National Action Plan that relates to forms of remediation. There's a lot of fragmentation ... [state and territory schemes] are not fit for purpose ... There's no remedy if a person is a victim-survivor of modern slavery, unless they've also experienced harm in the way that is interpreted [in state and territory] legislation. So there are limitations. We don't have a special compensation scheme and that is really significant. (Consultation 30, Civil Society)

In this regard, the absence of an agreed model for enhanced civil protections and remedies for individuals in or at risk of forced marriage was identified as a significant gap in both prevention and support responses. Stakeholders were unable to reach consensus on a preferred approach during the life of the National Action Plan. Based on the draft models, further work to develop a nationally coordinated response on forced marriage civil protections and remedies is being undertaken by the Standing Council of Attorneys-General.

While the ARP provides access to 90 days of support through the STPP without the requirement to participate in criminal justice processes, eligibility for longer-term support through the STPP remains contingent on participation in these processes. This requirement was viewed as a significant barrier to accessing support, particularly for child victims and for individuals who may be willing but are assessed as unable to participate by criminal justice actors.

“

You have to be able to make a meaningful contribution to some kind of criminal justice outcome, even if you're not able to do so for reasons outside your control. And so there are, I think, an unknown amount of people who are being prevented from getting support who are victims. Who are just not getting that because our process is overly contingent, overly connected, to the criminal justice process ... We don't impose that kind of obligation on any other crime victim type. We don't require rape victims or domestic violence victims to report and cooperate with law enforcement in order to access those services ... The number of cases that actually successfully proceed to prosecution and conviction are so low [so] maybe this isn't working. Maybe we should look at different ways to do this. Maybe if we gave people more time to stabilise, feel safe, and build trust, we would get better victim testimony. (Consultation 14, Government: Other)

People shouldn't feel coerced into having to pursue a justice process because that's the only way they can stay in Australia [and receive support]. If a crime happened here in this country, we owe someone something. (Consultation 19, Government: Policy and Programs)

Gaps were identified in relation to specific victim-survivor cohorts. Stakeholders and people with lived experience raised concerns about the adequacy of support available for child victims, particularly in relation to the availability and accessibility of specialised services for victims of child trafficking, and children whose parents have experienced modern slavery. Children are eligible for the STPP; however, to be referred through the ARP, children under 16 years must have a safe guardian. Otherwise, they will be directly connected to the AFP, who can then refer them to the STPP (Salvation Army nd). Stakeholders also noted that service responses for children were often fragmented and not sufficiently tailored to their specific needs, highlighting the importance of specialised, trauma-informed and age-appropriate support services.

“

When I look at all those key priorities, [there's] a gap specifically for children in those areas. So, if we consider the referral pathways, whether it's to the Support for Trafficked People Program, it's not for children. The Additional Referral Pathway is not for children unless they have a guardian or they're over 16. (Consultation 43, Civil Society)

Children most of the time do not qualify as victim-survivors of modern slavery or human trafficking themselves. They are often experiencing violence, abuse or exploitation due to their parents experiencing modern slavery. (Consultation 44, Person with lived experience)

Stakeholders and people with lived experience raised similar concerns about the availability and accessibility of support for vulnerable populations who have specific therapeutic needs, including those who are culturally and/or linguistically diverse, and those who are neurodiverse.

“

Originally [two service providers] refused to even make an assessment [because] I think they weren't recognising it. It's a survivor with a different language background who seems to have some kind of neurodiversity or maybe acquired brain injury, so they expressed themselves differently ... They definitely struggled to communicate what has happened to them. (Consultation 48, Person with lived experience)

Neurodivergent survivors seem to be really invisible when it comes to the National Action Plan as well, and I think from my observations there is a really large cohort of people with support or additional needs or that fall within that neurodivergency side of things ... there's different conversations or ways that need to be approached. (Consultation 44, Person with lived experience)

Whereato's (2025) evaluation similarly suggested that the STPP is still ill-equipped to meet the needs of children and young people with complex mental health and addiction needs. This is due to elements of the design and operation of the STPP (ie eligibility criteria and focus on meeting the needs of the protective parent, inability of children to access casework, lack of relevant skills/experience in caseworkers) and systemic issues (ie difficulties referring to external services without parental consent, resourcing constraints in state/territory child protection and other relevant services). Importantly, separate research has been funded to further examine this issue and make recommendations to better address it in future (Chazal 2023). Systemic issues, specifically challenges supporting access to certain services such as accommodation and housing, also emerged as a constraint on the effectiveness of the STPP more broadly.

Stakeholders and people with lived experience raised serious concerns regarding referral pathways for potential victims identified at the border while trying to enter Australia, or through ABF operations onshore, who were not consistently identified and referred to the AFP and subsequently to the STPP, particularly if they were suspected or determined to be working in breach of visa conditions. This was seen to limit access to support and increase the risk of harm to individuals who may need assistance.

“

Often once someone is unlawfully in Australia that becomes their primary identity, as someone who's unlawfully in Australia rather than someone who is an exploited worker or someone who's in a situation of modern slavery or at risk of that. One of the tensions for the government is with identifying [unlawful] workers as people, people who have human rights and the right to dignity, even if they are unlawfully in the country ... often once someone is [identified as] unlawful, that's all that they are. They lose all other aspects of their experience. (Consultation 29, Civil Society)

[Raids] harm [migrant sex workers] rather than help them ... It doesn't achieve justice. A lot of people lost their incomes ... The very harmful result is that Asian migrant sex workers stop [seeking support] because they think that by [doing so they will] attract raids on their workplaces. (Consultation 40, Civil Society)

Further, some stakeholders perceived that difficulties accessing appropriate visas through the HTVF contributed to a victim-survivor's vulnerability, particularly if a person is granted a Bridging visa E without work rights and access to government-funded medical treatment (see also Doherty & Dowling 2026).

“

We need to understand better the intersection between modern slavery and migration and the challenges and the consequences of having people on temporary visas with no safety net, with no supports in place, with no access to government supports beyond the 90 days of the STPP ... What could be the consequences when you leave a person on a Bridging visa E with no work rights, no financial means waiting for a ministerial intervention that can take two or three years? (Consultation 32, Civil Society)

Support should also not be connected to visa status ... I struggled a lot because of my visa ... Survivor is survivor. And, mind you, a lot of migrants make the majority of survivors ... Now if the system is not supporting the majority, how are we combating modern slavery in Australia? So let's include everyone regardless of their visa status. (Consultation 46, Person with lived experience)

People with lived experience described further barriers to accessing support, including being unaware of the concept of modern slavery or not recognising that their experiences constituted modern slavery, a lack of awareness of dedicated support mechanisms in place for victims of modern slavery, support services applying inconsistent assessment criteria, and victims and survivors needing to advocate for themselves to ensure they were able to access support.

“

One of the reasons why it was very difficult for anybody to understand who to specifically reach out to is because ... everyone knew this was exploitation, but not everyone knew that this is considered modern slavery. (Consultation 45, Person with lived experience)

I didn't even know the services existed, so I couldn't even look up domestic violence services because I didn't know it was a thing, and things like case management, I'd never heard of it before. (Consultation 48, Person with lived experience)

I think there's even a lack of awareness ... in the modern slavery sector. It comes out very clearly. For example, the five organisations that are doing the Alternative Referral Pathway, if you go and present yourself to each one of them, each one of them will give you a different assessment of whether or not your experience qualifies and what part of your experience qualifies.

So not even in the sector [is] there a clear understanding ... of what modern slavery is. (Consultation 44, Person with lived experience)

I was able to find support but I had to do an enormous amount of work to get that help, and I do not think someone who did not have English or self-advocacy skills could necessarily have got the help I desperately needed. Even with all of those things I ended up periodically homeless and not knowing where to turn. (Consultation 49, Person with lived experience)

Stakeholders highlighted opportunities to strengthen support through the development of a national peer support network. While the STPP provides tailored, individualised assistance, a peer support model could complement existing services by connecting individuals with shared experiences. This was seen as a means of providing emotional support, practical advice and validation, as well as supporting empowerment and recovery in ways that extend beyond formal service delivery. This was supported by people with lived experience, who described engaging in both formal and informal peer support during the life of the National Action Plan. Peer support and advocacy allowed victims and survivors to access support mechanisms that were otherwise hard to reach and contributed to their recovery.

“

I also think that survivor-led organisations should be resourced to deliver peer support and advocacy, because right now survivors are doing this capacity building unpaid and unfunded by the NAP [National Action Plan] and it's not sustainable. (Consultation 44, Person with lived experience)

[We need] funding and creating peer-to-peer support. This includes social activities, but also survivors supporting other survivors in advocacy in order to access services. Too many survivors have only been able to access the STPP and the [Forced Marriage Specialist Support] Program due to other survivors advocating for and with the victim-survivors to help explain the experience according to the eligibility criteria. (Consultation 44, Person with lived experience)

Further, while stakeholders perceived that the specialist HTMS workforce has been strengthened, they identified the need to improve the capacity of mainstream service sectors, such as health and education, to identify and respond to individuals at risk of or experiencing modern slavery.

Overall, stakeholders emphasised that a more comprehensive, tailored and integrated support system is required. It should extend beyond crisis and short-term responses, be informed by people with lived experience and not depend on engagement with the criminal justice system. Strengthening pathways into support, extending the duration of support and embedding victim-centred and trauma-informed approaches in frontline practice will be critical to improving support and protection outcomes. Stakeholders also highlighted the importance of adopting a broader understanding of recovery and justice, including non-criminal justice options, and ensuring that the perspectives and needs of people with lived experience are central to defining what effective support, recovery and justice look like.

Outcomes

Comprehensive analysis of NMDS data relating to suspected victim-survivor profiles and provision of support is detailed in the two most recent *Modern slavery in Australia* reports (McDonald & Bricknell 2025; Bricknell & McDonald 2025). In 2024–25, 128 suspected victim-survivors were identified by the AFP (from reports that were accepted for investigation and not subsequently withdrawn). This is a decrease from 155 suspected victim-survivors in 2022–23. However, over the same period, there was an increase in the number of suspected victim-survivors accessing support through the STPP. In 2022–23, the AFP referred 74 individuals to the STPP. The number of individuals referred increased to 152 in 2024–25, when the ARP was introduced. During this year, 82 suspected victim-survivors were referred by the ARP and 70 by the AFP. Further, the introduction of the FMSSP in January 2025 meant that 63 individuals were able to receive tailored, wrap-around support for forced marriage. Alongside these NMDS figures, the evaluation of the STPP and ARP commissioned by DSS shows that the STPP saw an 85 percent increase in the number of clients between 2018–19 and 2023–24 (Where to 2025).

Alongside these improvements, some people with lived experience described positive experiences accessing support. Positive experiences centred on feeling that support services helped them to understand their rights and options, their needs and how to address them, to feel safe, to recover and to improve their health and wellbeing.

“

I don't know what I would have done without Salvation Army ... They've always been looking after me ... I started casework with them just when I was new here in Australia ... When I was transferred to Red Cross, STPP, the support was good. I stayed in their safe house ... They were also trying to help us with referrals to other organisations ... I got support with my health condition ... They advocated for me at uni to be given some time. They also bought me this laptop ... They paid my rent for almost a year until I got well ... They also paid for my lawyer when I was applying for a visa. (Consultation 46, Person with lived experience)

Similarly, findings from Whereto's (2025) evaluation of the STPP and ARP suggest that clients generally report highly positive outcomes from involvement, particularly in their immediate and short-term needs being met. This includes accessing direct social support, assistance navigating social security, healthcare and other support systems, and generating a sense of confidence and optimism as well as awareness of rights and options.

However, it remains the case that support through the STPP and Forced Marriage Support Stream are time-limited (90 days and 200 days, respectively) unless an individual is able and willing to participate in a criminal justice process (see also *Implementation successes, limitations and challenges* above). The Forced Marriage Support Stream stopped accepting clients in March 2025, when the Australian Government transitioned to the FMSSP. Support through the FMSSP is not time limited. Most clients supported on the STPP only accessed the 90-day Intensive Support Stream—which does not require engagement with criminal justice actors—before exiting the program. In 2022–23, 21.9 percent of clients progressed to the Justice Support Stream, which is available to suspected victim-survivors who are able and willing to participate in a criminal justice process. This decreased to 13.2 percent of clients in 2024–25. People with lived experience commented on the time-limited nature of support provided under the STPP, noting that this has implications for the type of support that victims and survivors can access, as well as their recovery.

“

There is a critical need for long-term support as the impact of modern slavery is lifelong. Most people go through multiple forms of trauma in their experience of modern slavery. For many, leaving their perpetrators does not end the cycle of violence, as many are still threatened and like myself, carry the shame and the burden of thinking we have dishonoured our family. Then this is like a dark cloud that follows us everywhere we go ... Survivors continue to feel unsafe, hyper-vigilant and neglected ... Ongoing support is essential to prevent people from falling back into cycles of violence and exploitation ... The nature of supports [needs to] shift over time, moving from immediate crisis response to recovery focused care, including mental health services and peer support for relational healing. (Consultation 44, Person with lived experience)

[There is a need to] prioritise long-term recovery of survivors, not just emergency. Move the system from focusing more on criminals, [to] survivors, their healing, them gaining their autonomy because that's what's taken from us, the economic empowerment, just them regaining their stability ... Put people at the centre of it. (Consultation 46, Person with lived experience)

Whereto's (2025) evaluation of the STPP and ARP similarly found that the time-limited nature of support for many clients constrained the STPP's capacity to meet clients' longer-term needs.

In 2024–25, most of the clients who exited the STPP did so because the timeframe for support had lapsed (46%), the justice process they were involved in was discontinued or finalised (13%) or the AFP decided that the client had not been exploited (10%). Nineteen percent of clients were unable or unwilling to participate in criminal justice processes and therefore did not proceed beyond the Intensive Support Stream. The remaining clients (9%) voluntarily exited or were involuntarily repatriated. Information was unavailable for three percent of clients. Similarly, the six clients who exited the STPP in 2022–23 did so because the timeframe for support had lapsed, because they declined to proceed beyond the Intensive Support Stream or the justice process they were involved in was discontinued or finalised. Importantly, people with lived experience commented on the potentially serious implications of people exiting support before they are prepared to do so, primarily due to the time-limited nature of support.

“

Probably 75 to 80 percent of our significant mental health crises and even intervention with suicidality have directly been the result of a destabilising event in a survivor's journey and that is usually around being off-boarded from one program and being moved on to another ... Sort of the ground being pulled out from underneath them as we get survivors kind of cycling through these short-term one-stop [programs] ... You actually set them back further when they're off-boarded, so we don't see that consistent ability for people to stabilise and rebuild. (Consultation 44, Person with lived experience)

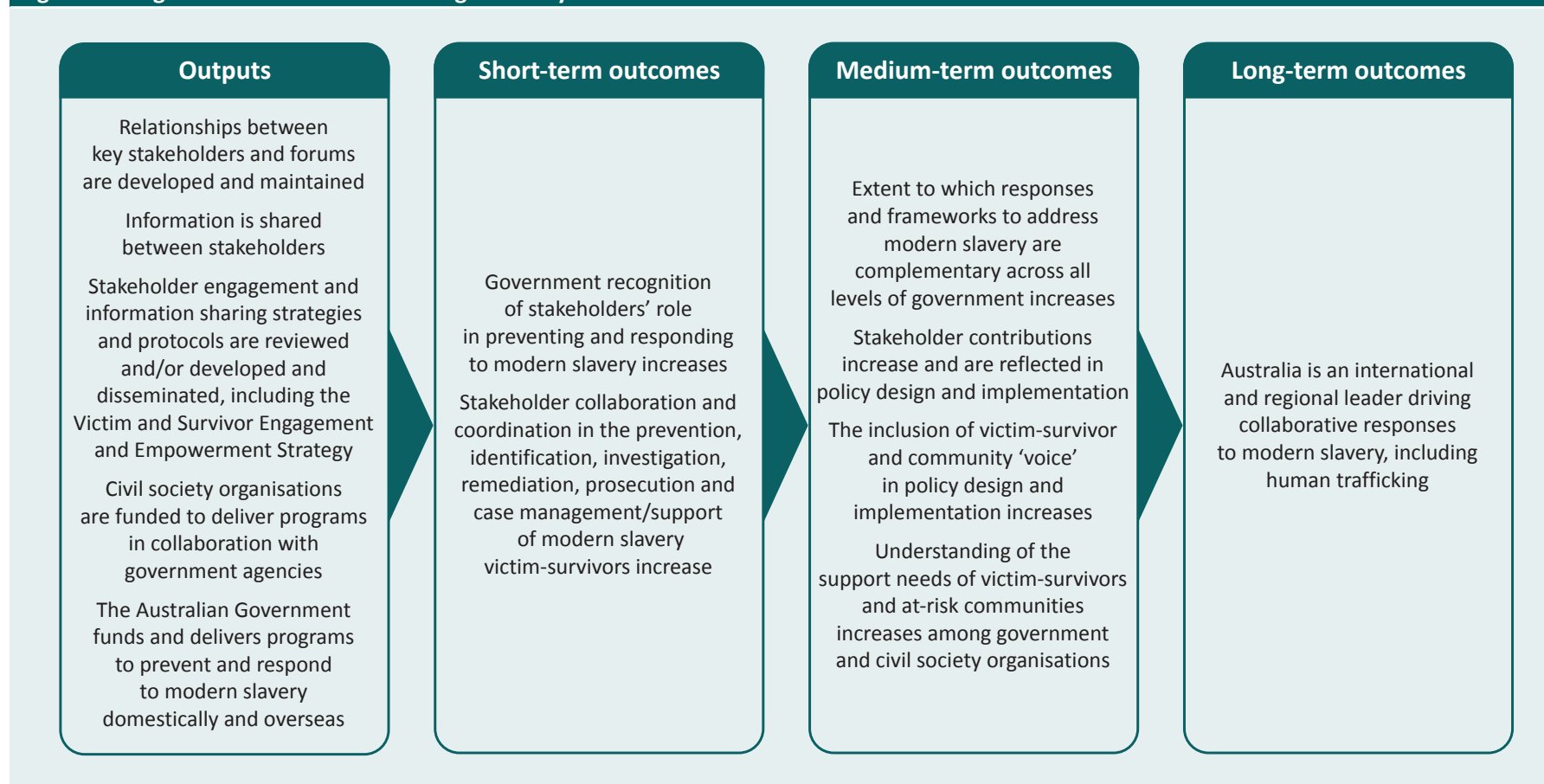
The person that was put onto the STPP in the end and was in the safe house was exited from both the STPP and the safe house at the same time into homelessness. (Consultation 48, Person with lived experience)

National Strategic Priority 4: Partner

Modern slavery is a complex crime that requires a multifaceted approach involving both domestic and international stakeholders. The successful implementation of a holistic response to modern slavery in Australia requires collaboration across government, civil society, business, unions, academia, international partners and people with lived experience of modern slavery.

The logic model for National Strategic Priority 4 (see Figure 10) articulates how action items were intended to contribute to the relevant longer-term outcome articulated in the National Action Plan: Australia is an international and regional leader driving collaborative responses to modern slavery, including human trafficking.

Figure 10: Logic model for National Strategic Priority 4: Partner



Implementation

This section assesses the implementation of action items under National Strategic Priority 4, how they contributed to outputs specified in the evaluation framework, and implementation successes, limitations and challenges. Action items were expected to result in the following outputs:

1. relationships between key stakeholders and forums are developed and maintained;
2. information is shared between stakeholders;
3. stakeholder engagement and information-sharing strategies and protocols are reviewed and/or developed and disseminated, including the Victim and Survivor Engagement and Empowerment Strategy;
4. civil society organisations are funded to deliver programs in collaboration with government agencies; and
5. the Australian Government funds and delivers programs to prevent and respond to modern slavery domestically and overseas.

Action items contributed to the outputs under this National Strategic Priority as per Table 12.

Table 12: Action items against National Strategic Priority 4 (Partner) and their contribution to relevant outputs

Action item	Output				
	1	2 ^a	3 ^a	4 ^b	5 ^b
Action item 29: Work collaboratively with states and territories to ensure complementary approaches to combating modern slavery in Australia					
Action item 30: Develop a strategy for Commonwealth cooperation with state and territory governments on modern slavery, building on existing cooperation and networks in states and territories					
Action item 31: Develop a Victim and Survivor Engagement and Empowerment Strategy					
Action item 32: Work collaboratively across Commonwealth departments and agencies to combat modern slavery risks in Commonwealth procurements and investments					
Action item 33: Provide funding and practical support through domestic grants programs to combat modern slavery					
Action item 34: Review the terms of reference, structure and membership of the National Roundtable on Human Trafficking and Slavery to support continued effective consultation on modern slavery issues					

Table 12: Action items against National Strategic Priority 4 (Partner) and their contribution to relevant outputs (cont.)

Action item	Output				
	1	2	3	4	5
Action item 35: Consult the Modern Slavery Expert Advisory Group and other civil society and business stakeholders to support effective implementation of the <i>Modern Slavery Act</i>					
Action item 36: Develop a Modern Slavery Recognition Scheme to highlight innovative and collaborative business and civil society actions to address modern slavery risks in supply chains					
Action item 37: Host a National Modern Slavery Conference to bring together civil society, business and other relevant stakeholders to drive action to tackle modern slavery					
Action item 38: Promote effective and coordinated international and regional responses to modern slavery in line with the International Strategy on Human Trafficking and Modern Slavery					
Action item 39: Provide funding to overseas anti-trafficking programs					

a: Action item 43, which sits under National Strategic Priority 5 of the National Action Plan (Research) also contributes to these outputs

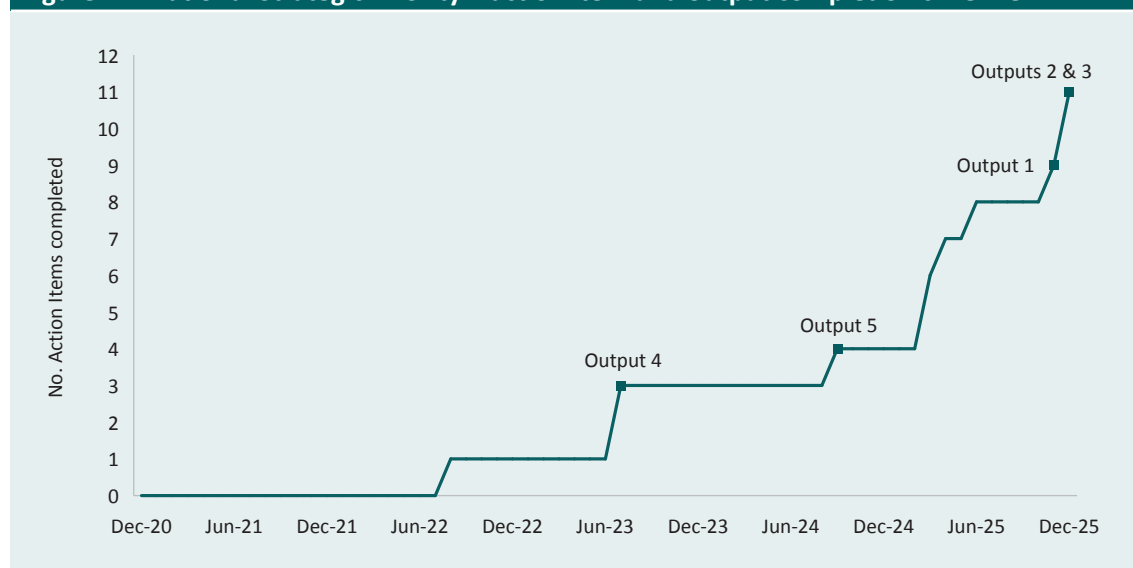
b: Action item 1, which sits under National Strategic Priority 1 of the National Action Plan (Prevent) also contributes to these outputs

Note: Progress made under each action item is detailed in the *Appendix*

Source: Australian Government 2020

Timeframes for completion of outputs and action items under this strategic priority are summarised in Figure 11. Most action items and outputs under this National Strategic Priority were completed in the plan's final year.

Figure 11: National Strategic Priority 4 action item and output completion timeline



Source: AIC Evaluation of the *National Action Plan to Combat Modern Slavery 2020–25*

Outputs achieved under National Strategic Priority 4

Output 1: Relationships between key stakeholders and forums are developed and maintained

Mechanisms for the development and maintenance of relationships between key stakeholders to prevent and address modern slavery in Australia are described under action items 29, 30, 32 and 35 in the *Appendix*. They include:

- the National Roundtable, established to drive law and policy reforms in Australia’s response to modern slavery, and comprising representatives from Australian Government agencies and non-government representatives from civil society organisations and industry bodies;
- the IDC, established to develop Australia’s anti-trafficking strategy, and comprising representatives of Australian Government agencies with portfolio responsibilities in relation to human trafficking and slavery;
- the OWG, established to consider and refer emerging operational and policy issues and solutions to the IDC, and comprising representatives from the AGD, ABF, CDPP, DFAT, Home Affairs and DSS.
- the Modern Slavery Expert Advisory Group (MSEAG), established to provide strategic advice to the Australian Government to support the effective implementation and operation of the *Modern Slavery Act 2018*, and comprising representatives chosen through a merit-based selection process who represent a diverse cross-section of business, civil society, union and academic experts;
- the Evaluation Governance Committee, established to oversee the AIC’s evaluation of the National Action Plan and comprising representatives from AGD, AFP, CDPP, Home Affairs and DSS;
- the Interdepartmental Committee on Modern Slavery in Public Procurement, established to address modern slavery risks in public procurement and drive whole-of-government action, including through the Commonwealth Modern Slavery Statement, and comprising representatives from non-corporate Commonwealth entities;
- the Intergovernmental Network on Modern Slavery in Public Procurement, established to share information and discuss current and future responses to modern slavery risks in public procurement and comprising representatives from all states and territories;
- the Forced Marriage Sub-Committee of the Family, Domestic and Sexual Violence Working Group of the Standing Council of Attorneys-General, established to tackle the issue of forced marriage through a national coordinated response, including by developing a model to enhance civil protections and remedies for individuals in or at risk of forced marriage, and comprising representatives from AGD, the AFP, and state and territory justice, police and child protection agencies; and
- the Human Trafficking and Modern Slavery Research Network (the Research Network), established to promote the dissemination of research about HTMS in Australia and comprising representatives from the Australian Government, state and territory governments, NGOs, academia and business (see action item 43 in the *Appendix*).

Other Commonwealth and state and territory forums that may facilitate collaboration between Commonwealth and state and territory governments in addressing modern slavery include the Standing Council of Attorneys-General, Police Ministers Council, Serious and Organised Crime Coordination Committee, Women and Women's Safety Ministerial Council, Meetings of Workplace Relations Ministers and NSW Anti-Slavery Commissioner Forums (see action item 29 in the *Appendix*). In addition to these forums, collaboration is facilitated through the National Policing Protocol (see action item 18 in the *Appendix*).

Relationships were also developed and maintained at the National Modern Slavery Conference (see action item 37 in the *Appendix*), with 87 percent of attendees who responded to the post-event survey indicating they made new connections with others working in the space. In addition, 87 percent of survey respondents indicated that the conference provided them with the opportunity to strengthen existing connections.

These relationships are supported by the strategy for Commonwealth cooperation with state and territory governments on modern slavery, which sets out principles of effective cooperation and focus areas for future cooperation, and provides examples of how these could be operationalised in practice (see action item 30).

Output 2: Information is shared between stakeholders

Information sharing underpins many, if not all, action items. Information is shared through key stakeholder partnerships, meetings between agencies, and other forums. These included, but were not limited to:

- national partnerships, including the National Roundtable, IDC, OWG, MSEAG, Evaluation Governance Committee, Interdepartmental Committee on Modern Slavery in Public Procurement, Intergovernmental Network on Modern Slavery in Public Procurement, the Forced Marriage Sub-Committee, and the Research Network (described under output 1 of National Strategic Priority 4 above);
- international forums (see action item 38 in the *Appendix*), including the UN Human Rights Council and the UN General Assembly Third Committee, the ILO, Organisation for Economic Co-operation and Development, World Trade Organization, the Bali Process and its working groups, and the Joint Steering Committee of Thailand's Counter Trafficking in Persons Centre of Excellence; and
- conferences, including the Modern Slavery Conference 2023 (see action item 37 in the *Appendix*), the Pacific Perspectives: Combating Human Trafficking in the Pacific 2023 regional conference (see action item 21 in the *Appendix*) and AIC conferences in 2022 and 2025.

Information sharing within these forums included reporting on the progress and completion of activities under the National Action Plan, providing input into these activities, and presenting the findings of research, reviews, inquiries and other reports. Outside of face-to-face discussions, written information—including meeting minutes, progress/completion reports, presentation slides, research, reviews, inquiries and other documentation—has routinely been shared via email with members across all of these forums.

In addition, relevant information may be shared through investigative assistance provided to international law enforcement and bilateral capacity-building initiatives (see action items 21 and 38 in the *Appendix*).

Output 3: Stakeholder engagement and information-sharing strategies and protocols are reviewed and/or developed and disseminated, including the Victim and Survivor Engagement and Empowerment Strategy

Strategies to facilitate engagement with relevant stakeholders under the National Action Plan included the following:

- updating the *Practice guidelines for organisations: Working with people in or at risk of modern slavery* (see action item 25 in the *Appendix*);
- reviewing the National Roundtable;
- developing and disseminating the strategy for Commonwealth cooperation with state and territory governments on modern slavery, which sets out principles of effective cooperation and focus areas for future cooperation (see action item 30 in the *Appendix*);
- developing and publishing *Modern slavery lived experience engagement and empowerment: Values, principles and practical guidance to support trauma-informed engagement and empowerment in Australia* (see action item 31 in the *Appendix*);
- revising the terms of reference, structure and membership of the National Roundtable (see action item 34 in the *Appendix*); and
- developing the Research Network, which promotes the dissemination of research about modern slavery in Australia and assists the Australian Government in its response to modern slavery by strengthening the evidence base to inform policy and program design (see action item 43 in the *Appendix*).

Relevant work was also undertaken by the grant recipients under the Modern Slavery Grants Program (see action item 33 in the *Appendix*):

- *Lived Experience Engagement Program and Strengthening and connecting survivor voices in Australia* (Salvation Army)—developed an evidence-based, survivor-endorsed framework for ethical and effective government engagement with survivors of modern slavery, the Lived Experience Engagement Program, which allows survivors to connect with each other and provides training around wellbeing and engagement with government. The development of the Survivor Advisory Council (SAC) further enables paid engagement with government on modern slavery policy and practice for Lived Experience Engagement Program participants. The Lived Experience Engagement Program supports survivors in this engagement by assisting with preparation, debriefing, access to interpreters, training, and the provision of funding for travel and childcare costs. Government and civil society may also receive training on how to effectively engage with modern slavery survivors;
- *Improving the Regulation of Modern Slavery and Access to Remedy: Learning from Experience* (UNSW Sydney)—engaged reporting entities to the *Modern Slavery Act 2018* interested in strengthening business practices to identify modern slavery risk and implement remedy through the publication of reports including *Good practice toolkit: Strengthening modern slavery responses*, which examined best practice approaches to meaningful engagement with stakeholders and suppliers (Nolan et al. 2023); and
- *Worker Led Empowerment* (Project Respect)—provided recommendations on best practices for engagement with people with lived experience, as well as guidance on how to support victims and survivors’ recovery in the report *Learning from experience: The role of economic empowerment in preventing exploitation* (Survivor Connections, Fair Futures & Project Respect 2026).

Output 4: Civil society organisations are funded to deliver programs in collaboration with government agencies

The 2020–21 Budget committed \$4.4m in multi-year grants for domestic civil society, businesses and academics to deliver projects to prevent and respond to modern slavery. These grants were delivered across two rounds. In 2021, \$1.67m was awarded to seven organisations, and in 2023 \$2.73m was delivered to 13 organisations. Successful projects focused on developing awareness-raising, capacity-building, prevention and intervention strategies, and contributed to a range of other action items. These are described under action item 33 in the *Appendix*.

During the life of the National Action Plan, the Australian Government continued to support efforts to respond to modern slavery through funding the Australian Red Cross to deliver the STPP, and Life Without Barriers to deliver the FMSSP. Funding was also provided to the Salvation Army to deliver the ARP. Finally, the Australian Government funded Anti-Slavery Australia’s Speak Now project, which aims to prevent forced marriage and other forms of modern slavery through education and awareness raising, as well as the My Blue Sky forced marriage support service.

Output 5: The Australian government funds and delivers programs to prevent and respond to modern slavery domestically and overseas

Over the life of the National Action Plan, the Australian Government funded and delivered programs to prevent and respond to modern slavery in both domestic and international contexts. Domestic funding is detailed under output 4 above, and included funding provided through the Modern Slavery Grants Program, and funding provided to relevant civil society organisations to deliver prevention and intervention programs (including the STPP, FMSSP, ARP and the Speak Now project).

In an international context, the Australian Government has invested over \$22.28b in official development assistance to support sustainable development and address drivers of modern slavery including poverty, gender inequality, lack of economic opportunity, lack of access to education and weak rule of law (see action item 1 in the *Appendix*). In addition, the Australian Government provided specific funding to support counter-trafficking programs overseas (see action item 39 in the *Appendix*). The AFP and CDPP have also supported and delivered training, capacity-building programs and other work in consultation with their international counterparts to respond to modern slavery overseas (see action items 17, 21 and 39 in the *Appendix*).

Implementation successes, limitations and challenges

Stakeholders spoke positively about the implementation of several elements of this National Strategic Priority. Many non-government stakeholders noted that, overall, they believed that opportunities for them and people with lived experience to consult and collaborate on government initiatives had increased.

“

There has been more consultation with CSOs [civil society organisations] and broader communities to meet some of the action items. (Consultation 30, Civil Society)

One thing I’ve observed is the involvement of people with lived experience, and advancement of our knowledge that people with lived experience should be included. (Consultation 27, Academia and Research)

There has been increasing sector and government commitment to meaningful engagement with people with lived experience. (Consultation 32, Civil Society)

The government is to be congratulated for listening and acting on expert advice and lived experience advice to create space for survivors to be speaking into the National Action Plan through the National Roundtable and other consultations that I know the Survivor Advisory Council has participated in. Before this action plan that wasn’t happening at all, or if it was it was very ad hoc. (Consultation 14, Government: Other)

A number of these non-government stakeholders mentioned the funding delivered by the Australian Government under its Modern Slavery Grants Program, as well as the administration of this program, as a positive contributor to this increase.

“

... the provision of funding and practical support through a domestic grants program to combat modern slavery. I think that's actually a really important one because it's very hard to provide the practical services that complement and supplement the official government response to modern slavery. (Consultation 35, Civil Society)

I appreciate how AGD have led projects under the grants ... In my experience, the management has been really positive in moving to a place of more openness and collaboration. (Consultation 29, Civil Society)

Several government stakeholders also noted an uptick in consultation and collaboration across government throughout the life of the National Action Plan.

“

Partnerships across government come through really strongly. (Consultation 19, Government: Policy and Programs)

I think it's been a real strength of the National Action Plan. So particularly in terms of coordinating government agencies, which we all know can be a really difficult thing, having it quite clearly set out in the plan who are the leads for different items is really helpful. (Consultation 15, Government: Other)

Many stakeholders, both government and non-government, praised the frameworks for partnership encompassed in the strategies and protocols for collaboration across different sectors developed under the National Action Plan.

“

The work that has been done on the Lived Experience Engagement Strategy, I think it's pretty important. (Consultation 30, Civil Society)

A government stakeholder noted that the International Strategy on Human Trafficking and Modern Slavery was:

“

... a very useful framework to be able to come back to and refer to when asking 'What are we doing and why? What are we trying to achieve?' (Consultation 16, Government: Policy and Programs)

Importantly, while this feedback concerns partnerships explicated in the National Action Plan, a number of stakeholders also spoke about the National Action Plan prompting the identification of unanticipated synergies and overlaps in work, encouraging unplanned collaborations (particularly between Australian Government entities and between NGOs) and emphasising the broader importance of partnerships.

“

There are huge positives that have been coming out of the current National Action Plan, particularly in terms of the structure and encouragement it provides for collaboration, including international collaboration. (Consultation 30, Civil Society)

It feels like it gives a sense of ‘we can all move in the same direction’. Rather than doing work in an isolated manner, we can move in the same direction together. It provides guidance to the sector as a whole. (Consultation 29, Civil Society)

In addition to praise for the increased volume of partnerships under the National Action Plan, stakeholders highlighted specific collaborations and information-sharing arrangements that they believed had been implemented effectively.

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We’ve got the HTMS Research Network, which is great, we can freely share research and information. (Consultation 42, Civil Society)

There is a push towards lived experience being included as equal members on the National Roundtable, the SAC [Survivor Advisory Council] has been invited to Ministerial Roundtables over the last three years and has had prominent guest roles there. (Consultation 39, Civil Society)

The LEEP [Lived Experience Engagement Program] and the SAC [Survivor Advisory Council] have been really good outcomes. It has been important to include the voices of people with lived experience and so that’s been a good success. (Consultation 31, Civil Society)

My participation in the review of the 2018 *Modern Slavery Act* was also really positive and was for me personally really cathartic and a really good experience. (Consultation 44, Person with lived experience)

Alongside these successes, stakeholders offered several critiques of the implementation of this National Strategic Priority. Critically, the National Action Plan emphasises the importance of working in partnership with state and territory governments and services to address modern slavery. It highlights state and territory responsibilities that intersect with modern slavery including child protection, domestic violence, and support (financial and otherwise) for victim-survivors, as well as their role in regulating supply chains. A number of action items also prescribe specific partnerships between the Australian Government and state and territory governments (ie 14, 23, 27) or the development of strategies for such partnerships (ie 18, 30). Similarly, action item 29 requires the Australian Government to ‘Work collaboratively with states and territories to ensure complementary approaches to combating modern slavery in Australia’. Output 1 above details specific partnerships and collaborations between the Australian Government and state and territory governments required under action item 29. Additionally, the National Action Plan similarly emphasises the importance of collaboration with the private sector in addressing modern slavery in supply chains, including in action items pertaining to specific collaborations (ie 35, 36, 37, 46).

Despite these activities, many of the stakeholders consulted as part of this evaluation believed that state and territory governments were still not as represented in partnerships concerned with addressing modern slavery in Australia as they should be. Stakeholders also discussed certain broader issues with the depth of partnerships across all sectors. All of these are examined further below under *Outcomes*. In discussing these issues, stakeholders highlighted aspects of the implementation of this National Strategic Priority that they viewed as constraining the volume and quality of partnerships. Primary among these were funding and resources. Government stakeholders consistently pointed to a lack of time and staff as limiting their ability to collaborate across the now wide variety of government portfolios with a stake in addressing modern slavery, despite wanting to.

“

IDC agencies generally want to do work together more but have limited capacity, so it’s just trying to understand that there’s not much that can be done where capacity is stretched. (Consultation 9, Government: Policy and Programs)

There’s a limit inherent in working with so many agencies. Coordinating with upwards of 12/14 agencies is challenging. It’s a big team across government, so any coordination is challenging. There are also agencies outside of the IDC who are engaged. The breadth and complexity of modern slavery means we need to engage with so many stakeholders which makes things long and complicated. (Consultation 12, Government: Policy and Programs)

Non-government stakeholders identified similar issues, focusing more on the short-term nature of government funding arrangements. Importantly, these shorter-term arrangements did allow for multiple funding rounds and the funding of a larger number of organisations, as well as some level of adaptability in the types of initiatives funded throughout the term of the National Action Plan. However, some argued that these arrangements also instilled a sense of precarity into their collaborations with government. Coupled with the generally small amounts of funding on offer, this constrained their capacity to collaborate effectively with both government and other NGOs.

“

There’s not necessarily the capacity and resourcing for identifying and implementing co-design in areas where it would be of benefit. That could be over a number of engagements, but it really takes longer to collaboratively examine an issue and find solutions. (Consultation 39, Civil Society)

Positive to see emphasis being put on the role of partnerships and collaborations but it’s challenging. In civil society, we felt there was a huge onus to do a lot of the work behind the action items while having no formal responsibilities for any of them in the National Action Plan. This collaboration and partnership may work with businesses, for example, which have income streams, but how does it work for NGOs when it’s not funded? It relies on goodwill and volunteering of time to enable that partnership. (Consultation 28, Academia and Research)

A few stakeholders argued that this extended to partnerships with those with lived experience as well.

“

It’s fantastic that the grant round got the SAC off the ground and that an NGO has had the space and culture to develop it. It’s a great place to start, but it’s now grant-dependent. We’re at the end of the grant period and it’s very unclear what’s happening next. (Consultation 39, Civil Society)

Additionally, and complementing the feedback above from government stakeholders on resourcing, some non-government stakeholders mentioned the high staff turnover in some government entities as a challenge to working in partnership with them. While unavoidable, they argued that this required frequently having to rebuild working relationships and, at times, wait for new staff to develop the subject matter expertise needed to work effectively with them.

“

Government turnover is an issue ... The constant turnover of staff makes it almost impossible to build a collaboration for two reasons. One, you need to get to know someone and build a personal relationship and trusting relationship to collaborate, and two there's a scramble of government to get feet under desks so the last thing on their mind is collaboration. (Consultation 34, Civil Society)

In my time, it's been AGD, Home Affairs, ABF, now back to AGD. It moves around a lot. Some of it has been the same staff moving between departments, other times staff changes. That's one of my concerns when it comes to partnerships. Sometimes staff are moved around and there's a loss of subject matter expertise there. (Consultation 29, Civil Society)

Another challenge identified pertains to the National Action Plan itself and its governance. Some stakeholders pointed out that, while the National Action Plan includes high-level commitments to working with states and territories, they believed that there was not enough guidance or instruction on when, how and to what specific ends Australian Government entities should be doing this. This perceived lack of prescriptiveness, some argued, meant that some areas where collaboration would have been beneficial were not adequately pursued.

“

In the forced marriage space, we're getting good engagement from states and territories. But we're not getting the same engagement in other areas, such as child protection. Here it would have been more helpful if the National Action Plan was more prescriptive about needing federal and state and territory governments to engage with each other. (Consultation 17, Government: Policy and Programs)

There are state-based services in exploitation that are now getting defunded. The reason is that they're not described in or allowed for within the National Action Plan so there's no incentive for states and territories to fund things to do with exploitation or work with the Commonwealth because it doesn't exist in the legislation, there's no KPIs [key performance indicators] ... Going forward, we should have more specific actions in the National Action Plan to break down silos between Commonwealth and states and territories. (Consultation 37, Civil Society)

Finally, stakeholders noted that different priorities across government portfolios, levels of government, organisations and sectors dampened the appetite for greater collaboration, especially without the incentive of sufficient funding or more prescriptive prompts to do so in the National Action Plan.

“

The space is changing constantly and is broadening and we now have two very different responses: frontline responses including service providers, police and government responses, the STPP and FMSSP and so on; and a business and human rights response. And neither are really thinking much about the connection between their two spaces. (Consultation 28, Academia and Research)

There is difficulty working in and with states and territories. Different priorities, legislation, funding, how support and response systems are set up. (Consultation 32, Civil Society)

When state and territory police or child protection encounter a, say, 14 year old forced marriage victim, and they look at the home life and they can see that the victim is otherwise fed, clothed and the living conditions are clean, and they then have to choose between prioritising resources for that forced marriage case or, for example, a two-year-old living in squalor who is malnourished and being abused, who do you think they're going to focus on? (Consultation 17, Government: Policy and Programs)

Outcomes

As with previous plans, responsibility for oversight and leadership of the implementation of the National Action Plan has continued to rest with the IDC. Chaired by the ABF until 2022 and AGD since then, the IDC brings together Australian Government departments and agencies with responsibilities under the National Action Plan every six to eight weeks to discuss progress, coordinate and scrutinise activities, explore opportunities to collaborate and share information, and plan ahead. Strategic advice and input into the direction and implementation of National Action Plan activities has also continued to come from the National Roundtable, whose membership consists of IDC entities as well as other government, civil society and private sector stakeholders. As a result of the review of the terms of reference, structure and membership of the National Roundtable, membership was also expanded during the term of the National Action Plan to include people with lived experience, the Australian and New South Wales Anti-Slavery Commissioners, International Justice Mission and Life Without Barriers.

Several multi-stakeholder decision-making bodies, working groups, advisory groups and information-sharing forums have also been established or expanded throughout the term of the National Action Plan. These bodies provide oversight, and facilitate collaboration, in relation to multiple aspects of Australia's response to modern slavery, and include:

- the Human Trafficking and Modern Slavery OWG of the IDC;
- the Interdepartmental Committee on Modern Slavery in Public Procurement;
- the Intergovernmental Network on Modern Slavery in Public Procurement;
- the Forced Marriage Sub-Committee of the Family, Domestic and Sexual Violence Working Group of the Standing Council of Attorneys-General;
- MSEAG;
- SAC; and
- the Research Network.

The latter three have become critical mechanisms for government stakeholders communicating and working in partnership with civil society, private sector, academic and lived experience stakeholders. Other multi-stakeholder bodies centred on policing responses to serious and organised crime (Serious and Organised Crime Coordination Committee and the Joint Management Group under it) and labour standards and regulations (Technical Officers Network and National Labour Hire Working Group) are also leveraged when required in responding to modern slavery.

Additionally, a series of more focused partnerships between the Australian Government and civil society groups, primarily enabled through Australian Government funding for programs delivered by civil society groups, have included:

- the STPP and ARP;
- the FMSSP;
- initiatives under the Modern Slavery Grants Program, several of which also enabled partnerships between non-government stakeholders; and
- international funding arrangements.

As further evidence of the Australian Government’s recognition of stakeholders’ role in preventing and responding to modern slavery having increased across the term of the National Action Plan, the input of non-government (civil society, private sector, academic and lived experience) and state and territory stakeholders was sought through consultations, and reflected in, many of the reviews, strategies, policies and programs undertaken or implemented under the National Action Plan. Prominent examples include:

- the review of the *Modern Slavery Act 2018*;
- *Practice guidelines for organisations: Working with people in or at risk of modern slavery*;
- *Modern slavery lived experience engagement and empowerment*;
- targeted reviews of Divisions 270 and 271 of the *Criminal Code Act 1995*, of Australia’s visa framework, and of support and legislative protections, defences and remedies available to modern slavery victim-survivors;
- a review of state and territory victims of crime financial assistance schemes and their availability to victim-survivors of modern slavery;
- *Guiding principles to enhance civil protections and remedies for forced marriage* (through the Forced Marriage Civil Society Consultation Group);
- the Modern Slavery Remediation Toolkit;
- national awareness-raising campaigns for World Day against Trafficking in Persons in 2022, 2023 and 2024;
- the Australian Government’s dedicated Modern Slavery in Australia website;
- the *Protocol for the treatment of children with lived experience of human trafficking, slavery or slavery-like practices*; and
- the Monitoring and Evaluation Framework for the National Action Plan.

Critically, non-government stakeholders generally reported an increase in opportunities to consult with and advise on government activities, and many reported believing that their views were taken more seriously than they previously had been.

“

It does feel like government consultation processes have been a lot better ... When you’ve been doing what I do for as long as I have, you start to get a feel for when you’re turning up at a consultation and it’s basically the public servants having to tick off having done it. I haven’t ever felt that way under this current National Action Plan. There has been a willingness to have genuine dialogue and to listen to stakeholders. (Consultation 42, Civil Society)

There’s been an increase in the depth of engagement between members of the National Roundtable. More insight into how each of our agencies work and the work we’re doing. It’s been really enriching. (Consultation 30, Civil Society)

The importance of lived experience engagement in particular was seen by many as being more widely acknowledged, and having improved considerably, across the life of the National Action Plan.

“

Increasing sector and government commitment to meaningful engagement and participation of people with lived experience has been a really significant shift during this National Action Plan. It's now recognised that meaningfully engaging people with lived experience strengthens relevance, impact and effectiveness of services, policies and programs. (Consultation 32, Civil Society)

We've seen a huge change in attitude and confidence of the anti-slavery sector in engaging with survivors on systemic work and I feel that the project has been really successful in moving the dial and changing attitudes about who should be involved and opening up a different understanding of survivors' capacity and agency, particularly their choices to do this work. Not everyone wants to, but we've opened the avenues. (Consultation 39, Civil Society)

Thinking about the good things ... The standout is changes to survivor voice. We're seeing the valuing of survivor voice improve out of sight, particularly in the last two to three years. There's always more to do and more refinement but huge change from where we were for the better. Can see the links to the actual National Action Plan as well so that's great. (Consultation 37, Civil Society)

As further evidence of this, lived experience advice had been sought and incorporated into activities under 18 of the National Action Plan's 46 action items by March 2025. Additionally, Australian Government entities worked with the SAC on at least 15 separate engagements since its establishment under the National Action Plan.

Importantly, while non-government stakeholders, including victim-survivors, had increasing input into the Australian Government's efforts to address modern slavery over the life of the National Action Plan, there were fewer instances of co-design and co-implementation. Stakeholders noted improvements in civil society, private sector and lived experience stakeholder involvement in co-design and co-implementation. A small number of National Action Plan activities that involved interacting with victim-survivors in some capacity included:

- the ARP;
- the FMSSP;
- *Practice guidelines for organisations: Working with people in or at risk of modern slavery*; and
- *Modern slavery lived experience engagement and empowerment* and the SAC.

However, many expressed a desire for increased opportunities for co-design and co-implementation beyond activities that involve direct work with victim-survivors, particularly awareness-raising initiatives and training for police and other frontline workers. This was generally highlighted as a limitation of the current National Action Plan, one that detracts from an otherwise marked increase in the Australian Government’s recognition of stakeholders’ role in preventing and responding to modern slavery.

“

Effective collaboration has to include more involvement at the front end of things. Too often we’re just updated on what is happening. (Consultation 34, Civil Society)

What’s still missing from the equation is survivors as collaborators and partners, not just a ticking box exercise ... I have seen a big shift in how survivor voices and perspectives are taken on board, but we still have a long way to go for real partnership and collaboration with survivors. (Consultation 44, Person with lived experience)

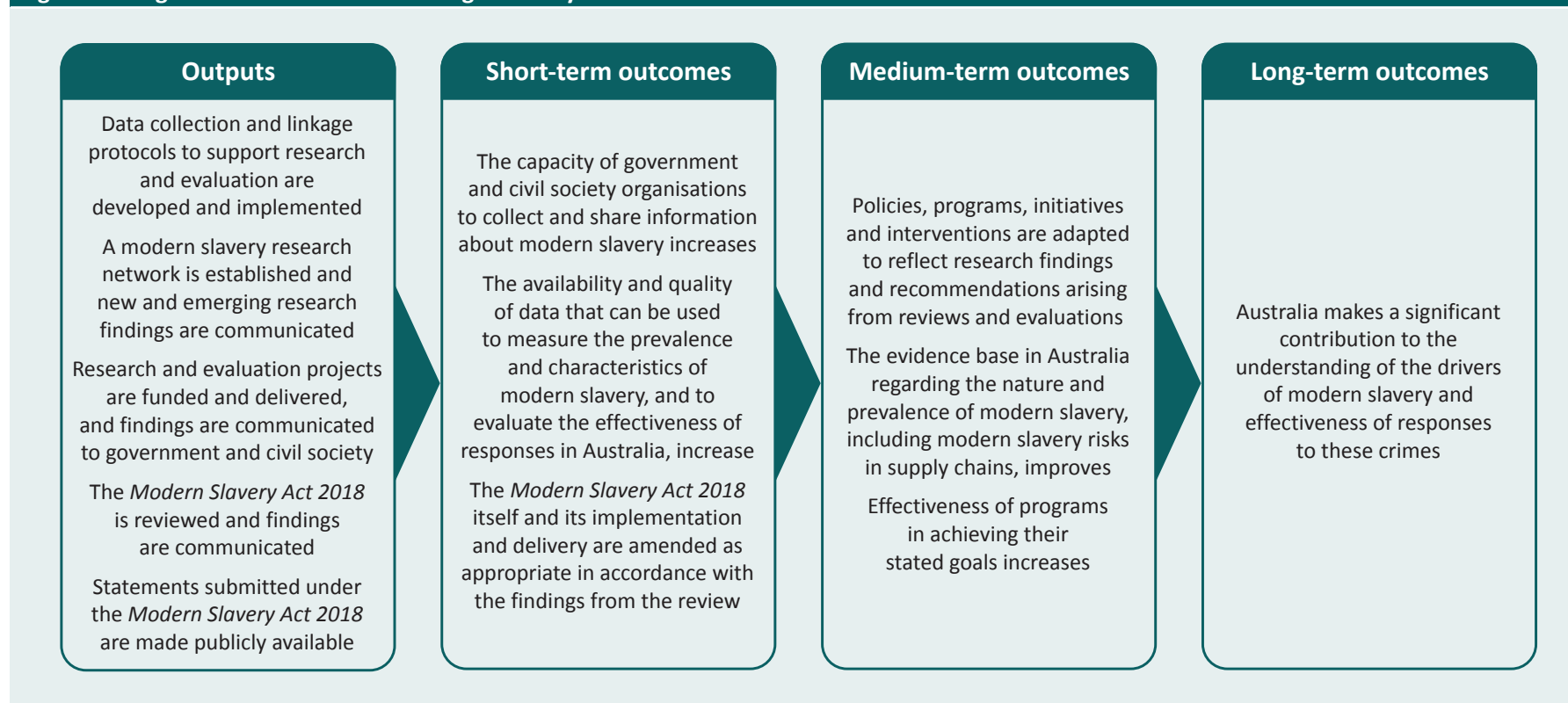
Additionally, as mentioned above, many of the stakeholders consulted as part of this evaluation believed that state and territory governments were still not as represented in partnerships concerned with addressing modern slavery in Australia as they should be.

“

The dream when the National Action Plan was launched was finding ways to engage with states and territories so that one day we could have a truly national action plan endorsed by states and territories. There have been some instances of improvement here, but there’s a lot of work to be done. (Consultation 12, Government: Policy and Programs)

There is mention in the National Action Plan of a strategy for collaboration with the states and territories, but this isn’t visibly active on the ground. (Consultation 37, Civil Society)

Figure 12: Logic model for National Strategic Priority 5: Research



States and territories were consulted as part of a range of activities under the National Action Plan, including many of those listed above. As noted, the National Action Plan also broadly acknowledges state and territory responsibilities that intersect with modern slavery, and prescribes specific activities which involve the Australian Government working with state and territory governments and the private sector. Coordination among state and territory police and the AFP in relation to modern slavery improved (discussed above under *National Strategic Priority 2*), as did instances of collaboration between state and territory governments in addressing modern slavery risks in public procurement. However, many of these activities involved identifying opportunities to improve and harmonise state and territory responses to modern slavery (eg civil responses to forced marriage, financial assistance schemes for victim-survivors, labour hire regulation), as well as developing an overarching strategy for working with states and territories in relation to modern slavery. Much of this work was finalised towards the end of the National Action Plan, in 2024 and 2025. As such, there has been very limited time to see its results in practice. Additionally, it is worth noting that, while multiple bodies bring together state, territory and Australian Government officials to drive responses to modern slavery (eg Intergovernmental Network on Modern Slavery in Public Procurement, Forced Marriage Sub-Committee, Serious and Organised Crime Coordination Committee and the Joint Management Group, Technical Officers Network, National Labour Hire Working Group), state and territory governments remain unrepresented on the IDC, the main governance mechanism for the National Action Plan. State and territory governments also have minimal representation on the National Roundtable.

Finally, the time-limited funding underpinning some of the Australian Government's partnerships with non-government stakeholders warrants brief reiteration here. Discussed in further detail as part of the process evaluation findings examined in the previous sub-section, these arrangements induce a degree of uncertainty about the longevity of some of these partnerships, which has implications for this National Strategic Priority's longer-term outcomes.

National Strategic Priority 5: Research

A strong evidence base is necessary to support an effective response to modern slavery in Australia and overseas. The National Action Plan supported strengthening of data collection processes through collaborative research and sharing of information.

The logic model for National Strategic Priority 5 (see Figure 12, on page 103) articulates how action items were intended to contribute to the relevant longer-term outcome articulated in the National Action Plan: Australia makes a significant contribution to the understanding of the drivers of modern slavery and effectiveness of responses to these crimes.

Implementation

This section assesses the implementation of action items under National Strategic Priority 5, how they contributed to outputs specified in the evaluation framework, and implementation successes, limitations and challenges. Action items were expected to result in the following outputs:

1. data collection and linkage protocols to support research and evaluation are developed and implemented;
2. a modern slavery research network is established and new and emerging research findings are communicated;
3. research and evaluation projects are funded and delivered and findings are communicated to government and civil society;
4. the *Modern Slavery Act 2018* is reviewed and findings are communicated; and
5. statements submitted under the *Modern Slavery Act 2018* are made publicly available.

Action items contributed to the outputs under this National Strategic Priority as per Table 13.

Table 13: Action items against National Strategic Priority 5 (Research) and their contribution to relevant outputs

Action item	Output				
	1	2	3	4	5
Action item 40: Establish a Monitoring and Evaluation Framework for the National Action Plan to enhance data collection and information sharing between government agencies, and with business and civil society organisations					
Action item 41: Undertake research on modern slavery in Australia through the Government's Human Trafficking and Modern Slavery Research Program					
Action item 42: Provide funding to academics, civil society and industry to undertake research on modern slavery in Australia					
Action item 43: Establish a research network to advance and promote collaboration on modern slavery research ^a					
Action item 44: Monitor and report on the implementation of the <i>Modern Slavery Act</i> , including through annual reports to Parliament					
Action item 45: Undertake a review of the operation of the <i>Modern Slavery Act</i>					
Action item 46: Publish modern slavery statements produced under the <i>Modern Slavery Act</i> on a public online register and provide business with guidance on compliance and good practice trends					

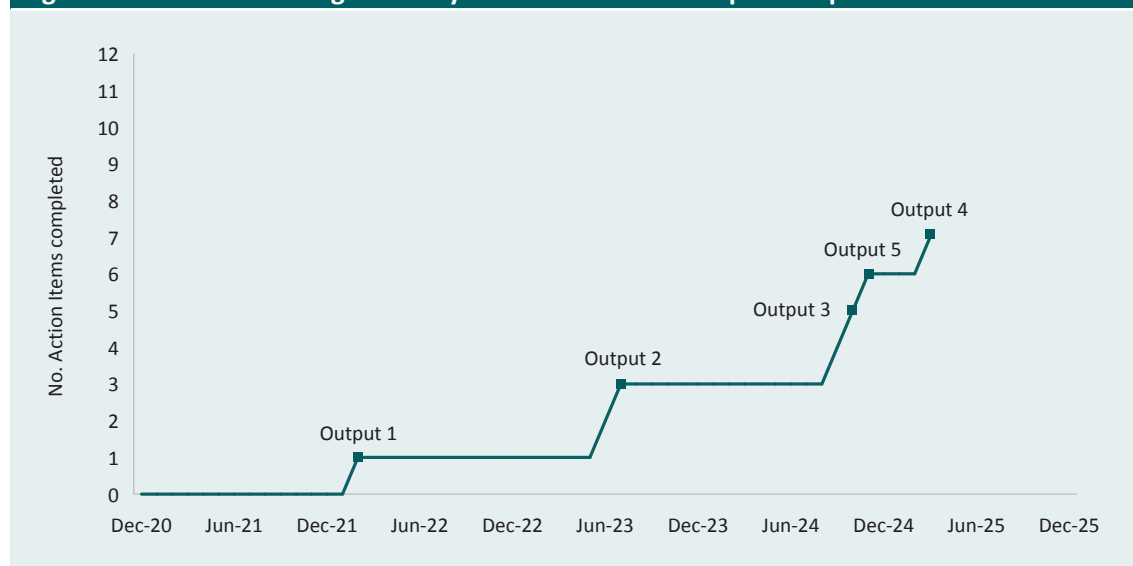
a: This action item also contributes to the following outputs under National Strategic Priority 4 (Partner) of the National Action Plan: information is shared between stakeholders; stakeholder engagement and information-sharing strategies and protocols are reviewed and/or developed and disseminated, including the Victim and Survivor Engagement and Empowerment Strategy.

Note: Progress made under each action item is detailed in the *Appendix*

Source: Australian Government 2020

Timeframes for completion of outputs and action items under this strategic priority are summarised in Figure 13. Action items and outputs under this National Strategic Priority were completed at a relatively consistent rate across the plan’s term.

Figure 13: National Strategic Priority 5 action item and output completion timeline



Source: AIC Evaluation of the *National Action Plan to Combat Modern Slavery 2020–25*

Outputs achieved under National Strategic Priority 5

Output 1: Data collection and linkage protocols to support research and evaluation are developed and implemented

The primary data linkage protocols and agreements developed under the National Action Plan are the Monitoring and Evaluation Framework for the National Action Plan, and the HTMS NMDS.

The evaluation framework was developed by the AIC in 2021, drawing upon consultations undertaken by ABF during the development of the National Action Plan and additional consultations undertaken by the AIC (see action item 40 in the *Appendix*). The purpose of the evaluation framework was to support the Government’s efforts to deliver its commitments articulated in the National Action Plan, and to inform the evaluation of the National Action Plan. It further ensured that all government agencies with responsibilities under the National Action Plan were aware of their intended involvement in evaluation activities, limiting the need for subsequent data sharing and related agreements.

The NMDS was established by the AIC in 2022 under action item 41 of the National Action Plan. While action item 41 does not directly relate to this output, the data-sharing agreement underpinning this activity is particularly relevant. The NMDS is an administrative dataset that links information about suspected victim-survivors and perpetrators of HTMS-related offences in Australia across key Australian Government entities and support providers. The AIC entered into data-sharing agreements with all relevant agencies prior to receiving data for the NMDS. These agreements have contributed to the successful completion of a pilot data collection (Gannoni & Bricknell 2024) and two subsequent data collections (Bricknell & McDonald 2025; McDonald & Bricknell 2025).

Output 2: A modern slavery research network is established and new and emerging research findings are communicated

The Research Network was established in 2022 to promote the dissemination of research about HTMS in Australia and to assist the Government in its response to modern slavery by strengthening the evidence base to inform policy and program design. The Research Network is convened by the AIC and meets twice a year. The purpose of meetings is to discuss and seek feedback from members on proposed research, to present findings from completed projects, and to explore areas for further research and partnership. In addition to regular meetings, the AIC administers the Active Project Register, a publicly available catalogue of research projects on modern slavery. The Research Network is open to individuals affiliated with an Australian or state and territory government department, NGO, business or research institution. Membership is by invitation or nomination from an existing member.

Output 3: Research and evaluation projects are funded and delivered and findings are communicated to government and civil society

Research and evaluation on modern slavery is primarily undertaken or funded by the AIC. The Human Trafficking and Modern Slavery Research Program is one of the AIC's research programs (see action item 41 in the *Appendix*). Relevant research undertaken during the life of the National Action Plan explored the following topics:

- support needs of victim-survivors of modern slavery (Boxall et al. 2023);
- the nature of modern slavery cases that come to the attention of authorities and their attrition through the criminal justice system (Lyneham 2021); and
- commercial exploitation of children (eg Brown, Napier & Smith 2020; Cubitt, Napier & Brown 2021; Gannoni et al. 2024, 2023; Napier, Teunissen & Boxall 2021a, 2021b; Teunissen et al. 2022; Teunissen, Cahill et al. 2024; Teunissen & Napier 2023, 2022; Teunissen, Thomsen et al. 2024).

In addition, the AIC developed the NMDS as part of the current evaluation of the National Action Plan. The NMDS is an administrative dataset that links information about suspected victim-survivors and perpetrators of HTMS-related offences in Australia. To date, the AIC has released three NMDS reports. These relate to the pilot period of 1 July to 31 December 2022 (Gannoni & Bricknell 2024), as well as 2022–23 (McDonald & Bricknell 2025) and 2024–25 (Bricknell & McDonald 2025).

Throughout the life of the National Action Plan, the AIC provided funding to civil society and academia to undertake research on modern slavery in Australia. This included funding to Project Respect, Australian Red Cross and Agora Consulting to contribute to research on the service needs of sexual exploitation victim-survivors in 2021.

Further research and evaluation projects were funded under the Australian Government’s Modern Slavery Grants Program (see action item 33 in the *Appendix*). Under this program, the Australian Government committed \$4.4m in multi-year grants to 20 projects focused on developing awareness-raising, capacity-building, prevention and intervention strategies, to be undertaken by civil society, business and academia. Funded research projects included:

- *Improving the Regulation of Modern Slavery and Access to Remedy: Learning from Experience* (Dinshaw et al. 2022; Marshall et al. 2023; Nolan et al. 2023; Sinclair & Dinshaw 2022);
- *Migrant Worker Modern Slavery Research Project, and Training for Evidence-Based Responses to Modern Slavery in Australia* (Berg & Farbenblum 2026);
- *Worker Led Empowerment* (Survivor Connections, Fair Futures & Project Respect 2026); and
- *Enhancing Modern Slavery Transparency and Disclosure. Artificial Intelligence Applications to Accelerate the Reading and Benchmarking Businesses’ Modern Slavery Statements* (Queensland University of Technology).

Research undertaken or funded by the Australian Government has been disseminated via a range of forums. This includes:

- publication of research findings (eg on the AIC’s website and the Research Network’s database);
- meetings of the Research Network (see *Output 2* above and action item 43 in the *Appendix*);
- meetings of the National Roundtable, IDC and OWG;
- the National Modern Slavery Conference 2023 (see action item 37 in the *Appendix*);
- AIC conferences in 2022 and 2025; and
- AIC research seminars and webinars.

Output 4: The *Modern Slavery Act 2018* is reviewed and findings are communicated

The implementation of the *Modern Slavery Act 2018* was monitored throughout the life of the National Action Plan. This was primarily achieved through ongoing reporting on the implementation of the Act through annual reports tabled in Parliament (see action item 44). The annual reports include a ministerial foreword and highlight implementation action and outcomes over the reporting period and key priorities for the next calendar year.

Further, and in accordance with s 24 of the *Modern Slavery Act 2018*, the Government undertook a 12-month review of the Act's operation and compliance over the first three years of operation (McMillan 2023; see action item 45 in the *Appendix*). The review was undertaken by Professor John McMillan AO and supported by AGD. It resulted in 30 recommendations to make the administration of the Act more effective. Key recommendations related to legislative changes (eg amendments to the reporting criteria, penalties for specific noncompliance, a due diligence obligation on entities, and a mechanism to declare certain matters as high risk), expanding guidance material for the Act, and enhancements to the Modern Slavery Statements Register.

The *Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Act 2024* came into effect on 7 November 2024. These amendments to the *Modern Slavery Act 2018* established the Australian Anti-Slavery Commissioner, set out the Commissioner's functions and dealt with other matters relating to the role of the Commissioner.

On 2 December 2024, the Australian Government released its response to the review report, agreeing in full, in part, or in principle, to 25 of the 30 recommendations. From July 2025 to April 2026, AGD undertook stakeholder consultations as part of its implementation of the Australian Government's response to the review. Approximately 630 stakeholders were consulted via 24 workshops, with over 200 submissions and written comments received. Stakeholders included industry, investors, civil society, unions, academics, workers, and people with lived experience of modern slavery. Findings from the consultations will inform the Australian Government's consideration of any future measures to enhance Australia's response to modern slavery in supply chains.

Output 5: Statements submitted under the *Modern Slavery Act 2018* are made publicly available

The national Modern Slavery Reporting Requirement under the *Modern Slavery Act 2018* obliges reporting entities (including the Commonwealth) to identify and address their modern slavery risks, and maintain responsible and transparent supply chains. Reporting entities must prepare annual modern slavery statements, and approved statements are published on the Australian Government's public-facing Modern Slavery Statements Register (AGD 2026).

There were five primary activities that contributed to the completion of this action item (see action item 46 in the *Appendix*):

- publishing approved modern slavery statements on the Modern Slavery Statements Register;
- releasing and updating guidance material on compliance with the *Modern Slavery Act 2018* to ensure it remains responsive to the evolving risk environment, emerging risk reduction practices, and expanded regulatory approaches;
- providing advice and information on compliance and good practice trends (see also action items 6 and 44 in the *Appendix*);
- providing advice to reporting entities via the Modern Slavery Statements Register Helpdesk; and
- providing education, information and advice to reporting entities via stakeholder engagement activities including attendance at forums, conferences and meetings.

In addition, the quality of modern slavery statements is assessed by Monash University annually and the resulting reports are published on their website (Pham, Cui & Ruthbah 2025, 2024a, 2024b, 2022, 2021).

Implementation successes, limitations and challenges

Government and non-government stakeholders were invariably supportive of research and improvements to data constituting one of the priorities of the National Action Plan. This was seen as critical to bolstering what is widely believed to be an incomplete evidence base, capturing new types and methodologies of trafficking and slavery, and improving the effectiveness of responses.

“

The addition of research is important, it allows us to capture new and evolving crimes, not to mention it strengthening the evidence base more broadly. (Consultation 9, Government: Policy and Programs)

Research is needed and researchers' perspectives are valued when included in policy. (Consultation 27, Academia and Research)

Research is an important priority. (Consultation 44, Person with lived experience)

Stakeholders pointed to the volume and variety of research and data collection activities undertaken as part of the National Action Plan—including the wide range of reports undertaken by the AIC, the AIC’s evaluation of the previous National Action Plan, evaluations of specific measures under the National Action Plan (eg the STPP and LALD), research funded by AGD, and efforts to improve data collection, sharing, linkage and consolidation—as indicative of the successful implementation of activities under this strategic priority. This is discussed more below as part of the outcome evaluation for National Strategic Priority 5.

Stakeholders also spoke positively about the implementation of information-sharing mechanisms, most notably the HTMS Research Network convened by the AIC, identifying it as an important new mechanism of engagement and knowledge-sharing across sectors.

“

I think the Research Network is a really good outcome. There’s a lot of engagement, it generates a lot of interest and discussion. (Consultation 30, Civil Society)

Getting people together for the Research Network and pushing the research in this space is huge. (Consultation 12, Government: Policy and Programs)

Alongside these positive elements of implementation, stakeholders also discussed a number of shortcomings. These primarily concern barriers stakeholders perceived to achieving greater comprehensiveness in research undertaken under the National Action Plan. Discussed in further detail below as part of the outcome evaluation for National Strategic Priority 5, a number of stakeholders pointed to a lack of research projects supported or undertaken under the National Action Plan on specific topics that were widely considered to be priorities (particularly modern slavery involving children and intersections with First Nations people) as well as a general lack of depth and nuance in the topics examined by many of these projects.

In highlighting these, stakeholders identified a number of factors that they believed were obstructing the development of a stronger evidence base. First, some mentioned the lack of adherence to any plan or agenda specifying priority knowledge gaps in government decisions around which research projects to support or undertake. It is noted that the National Action Plan specifies several high-level research priorities around new and emerging issues including long-term risks of modern slavery stemming from the COVID-19 pandemic, the intersectional drivers of modern slavery in Australia, offenders and offending methodologies, the prevention of forced marriage, and responding to modern slavery in supply chains. Additionally, the National Action Plan includes action items outside of National Strategic Priority 5 that concern reviews of existing responses, such as the targeted review of sections 270 and 271 of the *Criminal Code Act 1995* (Cth). But stakeholders were generally of the view that the research and data collection activities undertaken did not adhere to any clearly documented set of priorities and were not coordinated towards achieving specified aims. According to some, this resulted in a suite of research and data outputs which, while voluminous, are lacking in coherence and are not clearly targeted at filling certain knowledge gaps.

“

I don't even know how decisions get made about the kinds of projects that they're funding ... it just seems random. (Consultation 26, Academia and Research)

The National Action Plan includes action items on funding a body of research on certain topics, which is good, but there's no research agenda, no plans for what you want to know or what you want to achieve with it in what's actually been supported or done. (Consultation 14, Government: Other)

Second, many stakeholders spoke about ongoing gaps in quantitative data collections needed to empirically examine modern slavery and responses to it in Australia, which they argued have restricted opportunities for research on a number of topics. Despite acknowledging improvements in this regard over the term of the National Action Plan (particularly with the establishment of the NMDS but also the Modern Slavery Statements Register) and ongoing work to add to these collections, stakeholders highlighted continuing gaps in collections on modern slavery matters that come to the attention of law enforcement and other agencies as a key barrier to undertaking research on priority topics. Additionally, and noting how infrequently instances of slavery come to the attention of law enforcement and other agencies, some stakeholders highlighted that little progress has been made on collecting and collating data on modern slavery in the community.

“

We were excited when the six-month NMDS was released, but we want a bit more. AFP and STPP is such a small part of the picture. If we have better information, we can shape our response. (Consultation 29, Civil Society)

State and territory data are not included [in the NMDS] because the focus in the National Action Plan has been on Commonwealth government agencies ... The NMDS is also, frankly, very skewed towards criminal justice and enforcement data. Health data have not really been included, and again, that's partly because a lot of that would require engagement with state and territory level actors. (Consultation 14, Government: Other)

I would put in an action item around understanding the number of victims in this country right now. (Consultation 19, Government: Policy and Programs)

Importantly, the AIC's 2019 estimate of the number of persons affected by modern slavery in Australia draws on data from the same sources as those which now regularly contribute to the NMDS (Lyneham, Dowling & Bricknell 2019). In supporting the establishment of the NMDS, the National Action Plan has laid the groundwork for future, and more regular, updated estimates of the number of persons affected by modern slavery in Australia, including those who do not come to the attention of police and other systems. Additionally, one of the projects funded under round two of the Modern Slavery Grants Program (Migrant Worker Modern Slavery Research Project, and Training for Evidence-Based Responses to Modern Slavery in Australia) involved surveying almost 10,000 migrant workers in Australia. It found that one-third of respondents had experienced at least one indicator of forced labour (Berg & Farbenblum 2026).

A number of these stakeholders spoke of the ongoing siloing of officially recorded data on modern slavery matters across law enforcement, health, other government agencies and civil society, along with the organisational and methodological obstacles to linking it, as a key challenge to improving data collections on modern slavery.

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We need to better understand the full range of administrative datasets that can be used to examine and measure HTMS, and how they can be used to achieve a full picture of HTMS across the country. (Consultation 14, Government: Other)

From a national perspective, the lack of consistency in definitions and terminology means that data from different jurisdictions and silos is difficult to join up to gain a comprehensive national picture. There's a lot of work needed to harmonise definitions, and this all takes time. (Consultation 33, Civil Society)

Additionally, a handful of stakeholders highlighted an over-emphasis on quantitative data over information recorded qualitatively in these collections, which they argued also limited the scope for research on certain topics.

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Reporting to police is recorded quantitatively. So I understand what they're saying about the NMDS, but I also think qualitatively there has to be an aspect where we bring that in on a semi-regular basis too. The statistics themselves are not going to do enough. (Consultation 35, Civil Society)

I think in many ways the numbers that are counted or the quantitative approach is usually like the numbers of survivors that have engaged with a service. But it's the other factors that are important. We might say that 70 people were referred to a service, but how many of those ended up in a significantly better position in their lives, or were significantly able to stabilise or heal as a result? So there's never that qualitative approach of understanding the impact ... (Consultation 44, Person with lived experience)

Finally, a small number of non-government stakeholders discussed funding as a key barrier to achieving a comprehensive suite of research that strengthens the evidence base on modern slavery. Noting the \$4.4m in funding provided under the Australian Government’s Modern Slavery Grants Program, which included funding for some research projects, as well as external evaluations of the STPP and ARP and research on modern slavery undertaken within government (eg the AIC’s Human Trafficking and Modern Slavery Research Program), these stakeholders identified the small amounts offered to non-government researchers for individual research projects, and the prioritising of funding for research on broader as opposed to narrower topics, as key obstacles.

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There’s insufficient funding on offer for *good* research. Small amounts mean those tendering for research contracts need the resources to absorb additional costs involved in doing the research to the standard required. You’re not getting much of the research the government asks for with the amounts that they’re offering for individual projects. (Consultation 26, Academia and Research)

Research requires proper funding to cut through the surface of some prevalent, and problematic, narratives about trafficking and slavery. (Consultation 40, Civil Society)

When you’re working in a pretty niche area, research funding is harder to obtain. A lot of the community groups we’re speaking about require dedicated support, which requires dedicated research to inform it. But the structure of the National Action Plan means the government are seeking broader research and you’ll never get the depth there. (Consultation 31, Civil Society)

Outcomes

Findings point to a significant improvement in the evidence base regarding modern slavery across the life of the National Action Plan. Twelve research reports were completed across the term of the National Action Plan as part of the AIC’s Human Trafficking and Modern Slavery Research Program. These reports examine the support needs of victim-survivors, the volume and nature of cases that come to the attention of authorities and their attrition through the criminal justice system, community awareness of modern slavery and response mechanisms, the commercial sexual exploitation of children, and border control measures. Three academic research projects were also funded through the Australian Government’s Modern Slavery Grants Program, focusing on modern slavery risks in global supply chains and in high-risk sectors, modern slavery screening processes in Australian emergency departments, and the use of artificial intelligence applications to accelerate the reading and benchmarking of businesses’ modern slavery statements.

These improvements are complemented by the establishment of two mechanisms for collating and sharing data on Australia’s criminal justice and business response to modern slavery, and supporting future research projects on modern slavery:

- the NMDS, out of which three public research reports have been published summarising information on all modern slavery events that have come to the attention of Australian Government agencies; and
- the Modern Slavery Statements Register, with total registered statements covering an estimated 19,440 entities, with increasing numbers of voluntary statements submitted across the term of the National Action Plan, and over five million searches as at 31 December 2024.

While it was not possible within the timeframe of this evaluation to establish whether the effectiveness of programs and measures established under the National Action Plan increased, or the extent to which programs and measures have been adapted to reflect emerging research findings, several ongoing and completed reviews and evaluations (not all of which are encompassed in this National Strategic Priority) have laid the empirical groundwork for such improvements and adaptations. These include:

- commissioned evaluations of the LALD Program (ongoing at the time of this evaluation’s completion) and the STPP and ARP;
- the review of the *Modern Slavery Act 2018*;
- the targeted review of Divisions 270 and 271 of the *Criminal Code Act 1995*;
- the targeted review of Australia’s visa framework and of support and legislative protections, defences and remedies available to modern slavery victim-survivors; and
- the review of state and territory victims of crime financial assistance schemes and their availability to victim-survivors of modern slavery.

As mentioned above, stakeholders were generally complementary of the volume, variety and quality of research and data collection activities undertaken under the National Action Plan.

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There have been notable improvements in data collection and reporting, such as the establishment of the NMDS. (Consultation 32, Civil Society)

The other thing is improvements in data collection, particularly the NMDS. While some of it has a way to go and the work so far hasn’t reduced the burden of reporting, we’re optimistic that it will. This has achieved consistency in how agencies are collecting data and has been one of the wins. (Consultation 20, Government: Policy and Programs)

Reflecting on where we were five years ago and where we are now in terms of the amount of research available, there have been significant gains made. (Consultation 12, Government: Policy and Programs)

Stakeholders generally spoke positively of the review of the *Modern Slavery Act 2018*, and of the reporting obligations under this Act, as important mechanisms for monitoring and identifying modern slavery in businesses and supply chains, and generating an accessible repository of information that could be used in future research projects on this topic (eg Pham, Cui & Ruthbah 2025).

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Done well for the *Modern Slavery Act* and guidance for businesses. Review of the Act was massive. (Consultation 14, Government: Other)

Since we’ve had the *Modern Slavery Act* and associated reporting obligations, which all agencies contribute to, lots of information has come through from [Attorney-General’s Department], particularly around procurement processes. They also ask for input into the Commonwealth statement (under the *Modern Slavery Act*), which holds agencies accountable and ensures they are all benefitting by obtaining greater knowledge, even if they’re not delivering action items under the National Action Plan. (Consultation 20, Government: Policy and Programs)

The Research Network, chaired by the AIC, has grown to 166 members from across government, academia, civil society and the private sector. It has met six times since its establishment as of the time of writing (twice per year from 2023) and featured presentations on 15 ongoing and recently completed research projects by members and invited guests, as well as a series of discussions on topics such as the use of artificial intelligence in trafficking and the bridging of policy and research in modern slavery. The Research Network has also launched a public register of active research projects so members can share the details of their ongoing research, although uptake of this register has been slow and at the time of writing only three research projects have been uploaded. Together, these activities have significantly strengthened the sharing of research and evidence on modern slavery between researchers, government officials and other stakeholders.

However, limitations were identified in the coverage of this research, with few research projects focusing on topics that stakeholders considered to be a priority. While the AIC published a number of studies on the online commercial sexual exploitation of children during the term of the National Action Plan, some stakeholders highlighted a lack of research examining modern slavery in Australia affecting children and First Nations people. These stakeholders pointed to an ongoing lack of understanding of the prevalence and needs of child victim-survivors more broadly that research under the National Action Plan has not adequately addressed.

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We want children in Australia to be seen—to be correctly identified, not hidden under another offence, we want data collected and for them to be counted ... (Consultation 43, Civil Society)

There's a real lack of understanding of modern slavery, and risks of it, in relation to First Nations people in Australia. A real need for more research there. (Consultation 12, Government: Policy and Programs)

Despite the support for research under the National Action Plan, these gaps in understanding of the nature and prevalence of modern slavery against two acutely vulnerable groups persist.

Some stakeholders also highlighted a general lack of depth in the topics of much of the research undertaken under the National Action Plan, arguing that it focused heavily on mapping the problem of modern slavery and understanding its indicators, with little effort put into more nuanced analyses of the drivers of modern slavery, and the reasons for broader trend changes.

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The existing data through IDC, AFP and AIC is sporadic and doesn't come with meaningful analysis. There are changes, but why? If we don't understand why then we can't target future efforts. (Consultation 14, Government: Other)

We need to dig further down into quantitative trends. For example, attrition rates—why was there attrition? Need to be careful not to simply assume that there wasn't enough evidence or that this is a difficult cohort. In many cases it will be because victim-survivors are scared or there is a real risk of harm. (Consultation 44, Person with lived experience)

Stemming from this, the small number of empirical evaluations of activities under the National Action Plan is also acknowledged. With a few exceptions (eg evaluations of the STPP, ARP and the LALD Program) many of the activities undertaken under the National Action Plan are not being evaluated at the time of writing. This work is critical to achieving the longer-term outcomes specified above.

Finally, it is worth reiterating the ongoing gaps in quantitative data collections such as the NMDS available to empirically examine modern slavery and responses to it in Australia, including the absence of state and territory data, health data and data from key civil society organisations. There is also a dearth of data on unreported modern slavery in the community available for broader research. Discussed above as a limitation in the implementation of this strategic priority, it also constitutes a gap in its outcomes.

Summary and conclusions

This report describes the findings of a process and outcome evaluation of the *National Action Plan to Combat Modern Slavery 2020–25* (Australian Government 2020). The National Action Plan provided the strategic framework for the Australian Government’s response to modern slavery over the five years of its operation, comprising a series of 46 action items under five National Strategic Priorities:

- Prevent;
- Disrupt, investigate and prosecute;
- Support and protect;
- Partner; and
- Research.

The process evaluation examined the extent to which action items encompassed within the National Action Plan were implemented as intended. The outcome evaluation examines the extent to which the intended outcomes of the National Action Plan were achieved. This work was underpinned by an evaluation framework, detailing the aims and methods of the evaluation, a series of logic models connecting key outputs from each of the National Action Plan’s five National Strategic Priorities with short-, medium- and long-term outcomes, and data sources and collection activities. The evaluation framework was informed by a review of consultation transcripts and written submissions received by ABF as part of the development of the National Action Plan, as well as interviews undertaken independently by the AIC with stakeholders across five expert advisory groups.

The National Action Plan represents a substantial advance in Australia's response to modern slavery, establishing a clearer and more specific strategic vision than previous modern slavery plans and strategies—one aligned with international best practice through the 4Ps framework (protection, prevention, prosecution and partnership). It also introduced a more coordinated and accountable approach by assigning responsibility for each activity across government and laid the groundwork for sustained future efforts beyond its term of operation. However, stakeholders noted the limited involvement of persons with lived experience in the design of the National Action Plan, and this was partially reflected in some of the language and framing used in the plan to represent Australia's response, as well as its lack of attention to groups and contexts at high risk of modern slavery. Additionally, while action items were situated within, and clearly connected to, strategic priorities, the intersections between these action items and other relevant national plans, and their connection with (particularly short- and medium-term) outcomes, could have been better articulated. Finally, action items were not scheduled for delivery in a phased and logical manner. A disproportionate number of action items were not delivered until the final 18 months of the plan, and some action items, particularly those concerning partnerships and research, were delivered after others that they could have contributed to or supported had they been delivered earlier.

Overall, the National Action Plan was implemented with a high degree of fidelity, with all action items completed prior to the end of December 2025. While action items were detailed and prescriptive in their requirements, many stakeholders still noted significant flexibility to adapt activities as required, which was ensured by both the plan itself and the governance of activities under it. Critically, the fundamental elements of these governance processes for the implementation of the National Action Plan largely functioned as intended. However, the shift in responsibility for the National Action Plan from ABF to AGD midway through its term, and consequent changes in responsibility for some action items, introduced unanticipated challenges in implementation. This exacerbated pre-existing difficulties stemming from confusion around where lead responsibility sat for action items assigned to more than one Australian Government entity. Stakeholders also drew attention to drawbacks in the plan's governance, such as opaque endorsement processes for action items (more so earlier in the National Action Plan's term), onerous reporting requirements with no clear purpose, and little sustained effort to raise and maintain awareness of the National Action Plan across government.

Across the five National Strategic Priorities, all specified outputs were achieved. Broadly, these outputs comprise initiatives which:

- deliver and support awareness-raising, education and training activities;
- establish and support services for victim-survivors of modern slavery;
- foster operational improvements in the policing of modern slavery;
- foster changes in business processes, particularly procurement and investment, to limit opportunities for modern slavery;
- establish and support partnerships with stakeholders across and outside of government, and improve information sharing between them; and
- fund and support research activities.

The successful completion or implementation of such a wide range of initiatives represents a significant success of the National Action Plan. This has also translated into positive outcomes, including:

- the engagement of significant numbers of frontline workers and community members in new training and education programs;
- increased awareness and understanding of modern slavery in the community;
- improvements in the identification of modern slavery, as indicated by an increase in the number of reports to the AFP;
- an increase in victim-survivors being referred for support through the STPP, and the engagement of victim-survivors of forced marriage in the new FMSSP;
- the establishment or expansion of several decision-making bodies, working groups, advisory groups and information-sharing forums, and expanded opportunities for input into Australian Government initiatives by civil society, business and persons with lived experience of modern slavery; and
- the expansion and consolidation of the evidence base with the publication of multiple research and review reports, the establishment of the Research Network's Active Project Register, and the establishment of the NMDS and Modern Slavery Statements Register.

Importantly, despite full realisation of all action items under the National Action Plan, challenges and drawbacks were identified in implementation, limiting the achievement of some outcomes. While a wide variety of awareness-raising, education and training initiatives were implemented, many were time-limited or undertaken irregularly, potentially constraining their impact. Additionally, results suggest that community awareness-raising initiatives should enhance their focus on translating awareness into action. Funding emerged across multiple strategic priorities as another limitation, both in terms of the amounts offered and the short duration of many funding arrangements. Findings point to a need to engage more extensively with state and territory governments and services, particularly in further improving policing responses to modern slavery and support provision to victim-survivors. Many stakeholders also expressed a desire to involve persons with lived experience in the design and delivery of a wider range of initiatives beyond those that involve working directly with victim-survivors. Finally, the absence of a clear research agenda meant that important evidence gaps, particularly those concerning modern slavery affecting child victims and First Nations people, have not been adequately addressed. Gaps also remain in data available to study and monitor modern slavery in Australia and, perhaps most importantly, ascertain whether current efforts are reducing the problem.

Recommendations

The following recommendations are informed by the findings of the process and outcome evaluations, summarised above, and are intended to support the development of Australia's future strategic response to modern slavery.

Recommendation 1

The Australian Government should adopt an outcomes-focused approach to Australia's next strategy, which specifies clearly defined outcomes that are connected to activities and outputs via a theory of change, and measurable indicators to enable evaluation of effectiveness and impact.

Recommendation 2

The Australian Government should ensure the next strategy is informed by people with lived experience of modern slavery using principles of co-design to support the development of strategic priorities, activities and outcomes that reflect their needs and concerns. Where feasible, the Australian Government should also explore opportunities to co-design and co-deliver initiatives with people with lived experience including those beyond direct victim-survivor support activities, such as training of frontline workers. Lived experience engagement should be inclusive of diverse experiences, including differences in individual characteristics, forms of exploitation and support needs. Lived experience engagement should be aligned with policy and program development so people with lived experience can see how their contributions meaningfully inform and shape outcomes, ensuring engagement is purposeful and not undermined by preconceived assumptions.

Recommendation 3

The Australian Government should strengthen collaboration with state and territory governments in the design, governance and delivery of the next strategy to improve coordination and consistent implementation of activities nationally, leveraging existing forums and mechanisms where possible.

Recommendation 4

The Australian Government should adopt a phased and sequenced approach to implementing the next strategy that prioritises enabling initiatives early (eg activities pertaining to governance, partnerships and research) and clearly defines phases for delivery (eg year by year).

Recommendation 5

The Australian Government should consider how the framing and language used to describe modern slavery in the next strategy communicates the Australian Government's understanding of the issue to both domestic and international audiences. Specifically, framing should align with the objectives of the next strategy, avoid adversarial language, reflect the intersectional nature of modern slavery and the diversity of affected individuals and experiences, and promote a victim-centred and rights-based approach.

Recommendation 6

The Australian Government should clearly define agency roles and responsibilities in the next strategy, including by attributing lead responsibility for activities, to support effective coordination, accountability and delivery. The Australian Government should also promote and maintain awareness of the next strategy among key stakeholders, particularly staff within agencies responsible for its delivery.

Recommendation 7

The Australian Government should ensure that national awareness-raising initiatives are sustained over time and incorporate knowledge translation mechanisms that support the conversion of awareness into practical action within the community.

Recommendation 8

The Australian Government should ensure that the next strategy strengthens the integration of trauma-informed and victim-centred principles into identification, investigation, prosecution and support mechanisms, to reduce the risk of retraumatisation or further harm and to improve access to support.

Recommendation 9

The Australian Government should ensure projects are sufficiently funded to support the effective delivery of their intended outcomes.

Recommendation 10

The Australian Government should enhance the evidence base underpinning policy and practice responses to modern slavery, for example by establishing a research agenda in collaboration with researchers and other experts that identifies knowledge gaps, priority research topics and opportunities for improved data collection.

Recommendation 11

The Australian Government should strengthen accountability and oversight mechanisms in the delivery of the next strategy through, for example, the Australian Anti-Slavery Commissioner or the National Roundtable on Human Trafficking and Slavery, as well as ongoing monitoring and evaluation. Monitoring and evaluation should be supported by a framework developed concurrently to the next strategy so that intended outcomes, outcome measures and data requirements are defined from the outset.

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Appendix: Summary of activity under each action item

National Strategic Priority 1: Prevent

Action item 1: Provide funding and practical support through Australia's overseas development program and domestic grants programs to address drivers of modern slavery and empower individuals and groups vulnerable to modern slavery, including women and children

Action item 1 was reported as complete in June 2025. Completion was endorsed by the IDC.

Over the life of the National Action Plan, the Government invested over \$22.28b in official development assistance to support sustainable development and address drivers of modern slavery including poverty, gender inequality, lack of economic opportunity, lack of access to education and weak rule of law (see DFAT 2024). Outcomes associated with Australia's official development assistance are described in annual *Performance of Australian Development Cooperation* reports (see DFAT 2025, 2024). These reports summarise the performance of Australia's development cooperation and outline progress in implementing the *International Development Policy* (DFAT 2023b) and its *Performance and Delivery Framework* (DFAT 2023a). In addition, DFAT has continued to deliver Australia's long-term development investments to address the drivers of modern slavery, including the Association of Southeast Asian Nations-Australia Counter Trafficking (ASEAN-ACT) program and the TRIANGLE in ASEAN Program.

Under the Modern Slavery Grants Program, \$4.4m has been delivered to civil society, business and academia in multi-year grants to address the drivers of modern slavery and empower individuals and groups who may be at risk. This grants program is described under action item 33. Additional funded research is described under action item 42. Finally, the Australian Government funds the STPP and Anti-Slavery Australia's Speak Now project, which aims to prevent forced marriage and other forms of modern slavery through education and awareness raising, as well as the My Blue Sky forced marriage support service.

Action item 2: Deliver targeted awareness-raising initiatives on a range of modern slavery issues

Action item 2 was reported as complete in June 2025. Completion was endorsed by the IDC.

Targeted awareness-raising initiatives were primarily delivered under the Modern Slavery Grants Program (see action item 33), including:

- *Let's talk: A holistic approach to preventing forced marriage within the Muslim community* (Australian Muslim Women's Centre for Human Rights)—a series of training programs for young Muslims, Muslim parents and frontline workers, which were supported by an online campaign and the dissemination of a brochure on supporting Muslim victims of forced marriage (Australian Muslim Women's Centre for Human Rights 2023);
- *Work Right Hub* and *Work Right Hub 2.0* (Australian Red Cross)—an online platform that provides accessible information on labour exploitation and sources of support to migrants and frontline responders;
- *Lived Experience Engagement Program* and *Strengthening and connecting survivor voices in Australia* (Salvation Army)—training for survivors of modern slavery to learn about self-care, voice and leadership, government responses to modern slavery, and how to influence government agencies and others who are working for rights and freedom;
- *Honour My Choice* (Taldumande Youth Services)—training programs to prevent forced marriage and support children and young people affected by forced marriage;
- *Modern Slavery Impact Initiative* (Global Compact Network Australia)—training, forums and resources to support businesses to adopt a collaborative and multi-stakeholder response to modern slavery;
- *Improving the Regulation of Modern Slavery and Access to Remedy: Learning from Experience* (UNSW Sydney)—release of four reports that intended to improve understanding of modern slavery risks in global supply chains and develop an evidence base to inform policy and practice responses;
- *Educating for Change: Preventing and responding to modern slavery amongst university students in pre-service courses* (Australian Catholic Religious Against Trafficking in Humans)— free and accessible education to university students and staff to improve their ability to identify and respond to modern slavery in their fields (including social work, law, education, healthcare and university settings). The training can be tailored to meet the needs of specific sectors and is also available to the broader community (Australian Catholic Religious Against Trafficking in Humans 2026);
- *Shaping Futures: Prevention programs for young Muslim women* (Australian Muslim Women's Centre for Human Rights)—forced marriage prevention programs to Muslim young people to strengthen their ability to identify risks, understand their rights, advocate for themselves, and increase help-seeking behaviours, as well as a program to support Muslim mothers to improve their awareness of forced marriage and strengthen their ability to resist community and familial pressures;

- *Developing and disseminating guidance and training materials to assist frontline workers, businesses and modern slavery survivors in taking a trauma-informed approach to preventing, identifying, and responding to modern slavery* (HerSpace)—a national guide, training module and other resources to support frontline workers in any discipline to implement a trauma-informed approach to preventing, identifying and responding to modern slavery, as well as resources on psychoeducation for survivors and training for the broader community (HerSpace 2025);
- *Everyday Slavery* (Kyla Raby)—development of a strategic awareness-raising campaign delivered through social media to equip the public to address modern slavery in global supply chains and the Australian community;
- *Migrant Worker Modern Slavery Research Project, and Training for Evidence-Based Responses to Modern Slavery in Australia* (Migrant Justice Institute)—a report that aimed to improve awareness of, and responses to, underpayment and exploitation of migrant workers in Australia (Berg & Farbenblum 2026); and
- *Strategies to Prevent (SToP) Modern Slavery* (Settlement Services International)— guidance, resources and tools to support vulnerable individuals and communities at risk of modern slavery to improve awareness of their rights, particularly among multicultural communities.

Government agencies have delivered further targeted awareness-raising initiatives.

For example:

- Home Affairs published resources on migrant worker protections in 13 languages and engaged directly with communities across Australia through its Community Liaison Officer Network.
- The AFP delivered targeted awareness-raising in school communities and the entertainment and aviation sectors.
- AGD procured Communicorp to deliver training on how to engage with people who have experienced trauma and how to mitigate vicarious trauma among government officials who were going to engage with the pilot SAC.

National awareness campaigns delivered by government are described under action item 3, and awareness-raising campaigns and education and training programs with a focus on indicators of HTMS are described under action item 12. Finally, education and training programs that are delivered or funded by the Australian Government, typically to frontline workers, are described under action items 13, 14, 15 and 17.

Action item 3: Deliver national awareness campaigns to the Australian community on modern slavery

Action item 3 was reported as complete in June 2025. Completion was endorsed by the IDC.

Throughout the life of the National Action Plan, the Government released an annual national awareness campaign to coincide with World Day Against Trafficking in Persons and align with the annual themes set by the United Nations Office on Drugs and Crime to support amplification. These campaigns were also informed by consultation with government agencies and civil society and business stakeholders undertaken as part of the development of the Modern Slavery in Australia website (described under action item 4), which found that messaging needed to:

- be tailored to address the identified lack of understanding about what modern slavery is and the misconception that it does not occur in Australia;
- incorporate clear calls to action; and
- involve partnership with civil society.

The campaigns are described below.

The 2021 campaign aligned with the World Day Against Trafficking in Persons global theme 'Victims' voices lead the way' by leveraging case studies published in the National Action Plan to demonstrate what different forms of modern slavery can look like in Australia, indicators of modern slavery, and how to get help. It was designed in-house by ABF staff and comprised 12 social media posts disseminated across the ABF's Facebook and Twitter accounts without paid promotion.

The 2022 campaign focused on how traffickers use online platforms to deceive and recruit victims, aligned with the World Day Against Trafficking in Persons global theme 'Use and abuse of technology'. It further encouraged the Australian community to 'Look a Little Deeper. Recognise the indicators. Know what to do,' and provided information on how to get help. It was designed with the support of an external service provider and disseminated on ABF and Home Affairs' Facebook and Instagram accounts, both with and without paid promotion. The campaign reached almost 10 million users.

The 2023 campaign aligned with the World Day Against Trafficking in Persons global theme 'Reach every victim of trafficking, leave no one behind'. The campaign used animations from the 2022 campaign, translated into five community languages (Arabic, Hindi, Mandarin, Thai and Urdu). It was disseminated on Facebook and Instagram with paid promotion. The campaign reached almost 6.5 million users, including almost 350,000 culturally and/or linguistically diverse users who viewed the material in their own language.

The 2024 campaign focused on raising awareness of child trafficking and how the community can help to prevent this crime, aligned with the World Day Against Trafficking in Persons global theme ‘Leave no child behind in the fight against human trafficking’. Key messages included that child trafficking happens in Australia, and everyone can help stop it. It was disseminated on Facebook, Instagram and Snapchat with paid promotion. The campaign made almost 18 million impressions. As part of this campaign, the AFP displayed a campaign graphic on the electronic billboard outside of the Australian Centre to Counter Child Exploitation building and published a media release, and AGD posted graphics and information on its LinkedIn and Facebook pages. Materials were also provided to National Roundtable members for dissemination.

The 2025 campaign recognised the correlation between human trafficking and other forms of organised crime, aligned with the World Day Against Trafficking in Persons global theme ‘Human trafficking is organised crime—End the exploitation’. The Minister for Foreign Affairs, the Attorney-General and the Assistant Treasurer released a joint media statement reaffirming the Australian Government’s commitment to addressing human trafficking and slavery in all its forms and expressing deep concern about the growth of trafficking in persons into online scam centres for forced criminality. The statement had extensive social media engagement and coverage from the Heads of Missions across Australia’s diplomatic network. AFP shared a series of videos on social media to promote public awareness of trafficking in persons, indicators, AFP’s role and response, and how to report. The videos were collectively viewed more than 100,000 times across Facebook and Instagram. The Australian Ambassador to ASEAN released a video message and coordinated social media outreach across Australian embassies and high commissions in the region, amplifying shared messages on victim-centred responses and regional cooperation.

Action item 4: Launch new online information, tools and resources on modern slavery, translated into community languages

Action item 4 was reported as complete in February 2025. Completion was endorsed by the IDC.

In 2022, AGD consulted with 10 government agencies and 13 civil society and business stakeholders to understand the availability and accessibility of information and resources about modern slavery on Australian Government and grant-funded websites. Findings from these consultations indicated that:

- information and resources were fragmented across multiple websites;
- audiences had to use precise terms to find the information they needed, which may not have been consistent with their understanding of modern slavery or their lived experiences;
- information and resources did not convey the holistic Australian Government response or the range of support available to victims and survivors of modern slavery; and
- navigation and visual tools, translated materials and safety features were lacking.

These consultations also indicated that a website not affiliated with a specific government agency would be better received and more accessible to a broader user group.

AGD subsequently established a dedicated government website to host new and existing online information, tools and resources on modern slavery in 2024 (Australian Government 2024). The website was designed by a specialised developer and informed by further consultation with government agencies, civil society partners and people with lived experience (supported by the Australian Red Cross). The website provides authoritative and factual information on modern slavery from Australian Government agencies to support people in or at risk of modern slavery, frontline workers, businesses, academics and government officials, and to raise community awareness. It provides plain language information to help people determine whether they or someone they know needs help and includes a number of accessibility measures, including translation functionality, enabling the website to be translated in 249 languages, a ReadSpeaker function that reads website text aloud, and a 'quick exit' button. Development of the website involved consultation with government agencies, civil society partners and people with lived experience of modern slavery.

Further relevant government resources that were published online over the life of the National Action Plan and that are accessible in community languages include:

- the AFP website, which contains information about and indicators of crimes under Divisions 270 and 271 of the *Criminal Code Act 1995* (Cth) and how to report them;
- the Australian Anti-Slavery Commissioner webpage (Australian Government nd), which contains information about the Commissioner, their role and function, and how people in or at risk of modern slavery can find help and support; and
- the Family Safety Pack in the MyAus App, which provides information on forced and early marriage, human trafficking and other forms of modern slavery for people settling and living in Australia.

Finally, online information, tools and resources were published under the grants program (see action item 33), as well as through Anti-Slavery Australia's Speak Now project and the My Blue Sky forced marriage support service, both of which are funded by the Australian Government.

Action item 5: Provide education and advice about workplace rights and protections under the Fair Work Act 2009 and available FWO services, to protect and empower vulnerable workers

Action item 5 was reported as complete in May 2022. Completion was endorsed by the IDC.

FWO undertook a number of activities between 2020 and 2022 to establish ongoing sources of education and advice about workplace rights and protections, and to protect and empower vulnerable workers.

Specific activities undertaken in response to action item 5 include:

- establishing an Employer Advisory Service to advise small business employers on the National Employment Standards and award and enterprise agreement provisions relating to pay and employee entitlements, record keeping and pay slips;
- developing and publishing a number of information videos, including an animated video on sham contracting and videos for international students;
- developing animated videos and information sheets in community languages for Fair Work Inspectors to show at arrival briefings for Pacific and Timor-Leste workers in the Seasonal Worker Program and Pacific Labour Scheme;
- disseminating a communications campaign to promote the FWO's newly developed community language resources and website translation function; and
- updating the Fair Work Information Statement and publishing this and the Casual Employment Statement in 38 languages.

In addition, the Australian Government authorised the development of an information and education package to empower temporary migrant workers in 2024. This included a behavioural research component to generate an improved understanding of perceptions, mindsets and barriers within multicultural communities to reporting exploitation and the most effective ways to disseminate information within these communities. It also involves a capability-building component to engage third parties to establish a major and centralised capability in each state and territory to support temporary migrant workers who are experiencing workplace exploitation.

Action item 6: Deliver information and guidance to businesses, other reporting entities, investors and consumers on modern slavery risks in global supply chains and the Modern Slavery Act reporting requirements

Action item 6 was reported as complete in March 2025. Completion was endorsed by the IDC.

A number of activities were undertaken by AGD to fulfil this action item, including:

- releasing and updating guidance material on compliance with the *Modern Slavery Act 2018* on the Modern Slavery Statements Register (AGD 2026);
- participating in stakeholder events and conferences, including presenting to the Australian Government's National Modern Slavery Conference (see action item 37), and participating in over 300 presentations between 2020 and 2023;
- maintaining and improving the accessibility and clarity of the Modern Slavery Statements Register, which houses modern slavery statements and promotes transparency and accountability among reporting entities;
- providing advice to reporting entities via the Modern Slavery Statements Register Helpdesk;
- convening the Expert Advisory Group to provide expert advice on the implementation and operation of the *Modern Slavery Act*; and
- releasing a new Modern Slavery in Australia website (see action item 4).

In addition, DFAT undertook domestic and international outreach with a range of stakeholders to discuss modern slavery risks in global supply chains and reporting requirements under the *Modern Slavery Act*, particularly through Australia's Ambassador to Counter Modern Slavery, People Smuggling and Human Trafficking. DFAT also undertook a range of activities with business through Australia's diplomatic network and key anti-trafficking programs, including the ASEAN-ACT and TRIANGLE in ASEAN Program.

Further, Australia co-chairs the Bali Process and the Government and Business Forum of the Bali Process with Indonesia. The Government and Business Forum provides a platform for international collaboration between government and business leaders to combat modern slavery, and is particularly focused on ethical recruitment, transparency in supply chains and worker protection. This forum held a number of events to discuss and highlight modern slavery risks in supply chains, and launched a Business and Investor Toolkit to support members to take action to improve human rights standards and mitigate modern slavery risks in their supply chains. The Bali Process Regional Support Office also provided funding to the International Organization for Migration to develop *Protecting migrant workers in Indo-Pacific supply chains: A good practice guide for business and Bali Process member states* (International Organization for Migration 2022), which provides good practice and scalable solutions for business to protect migrant workers from exploitation. Australia also contributed to the *Compendium of good practice examples to combat exploitation in supply chains* (Bali Process 2021), a resource for government policymakers that illustrates ways to strengthen responses to exploitation in supply chains.

Finally, information and guidance about modern slavery risks in global supply chains was delivered to businesses, investors and consumers under the Modern Slavery Grants Program (see action item 33).

Action item 7: Progress initiatives to identify and address modern slavery risks in Government procurement and investments

This action item was reported as complete in April 2025. Completion was endorsed by the IDC.

AGD undertook a number of activities to fulfil this action item, including:

- preparation of the Commonwealth Modern Slavery Statement in collaboration with all non-corporate Commonwealth entities to provide a platform for entities to work together to identify and address modern slavery risk in government procurement and investments;
- identification of five key areas of focus for modern slavery risks in Commonwealth supply chains and operations, being ICT hardware, cleaning and security services, investments, textiles procurement and construction;
- supply chain mapping and risk assessments of high-risk areas to identify and assess modern slavery risks in government procurement and investments, with results disseminated to relevant Commonwealth agencies to inform ongoing modern slavery risk assessment and management;
- development, publication and dissemination of tools and guidance to lift capability across the public sector, including the Modern Slavery Toolkit for Procurement Officers, modern slavery e-learning modules for procurement officers, and an e-learning video on modern slavery risks in the cleaning industry;
- facilitation of presentations, workshops, working groups and conferences to increase officials' capacity to assess and address modern slavery risks in government procurement and investments;
- establishment of an Intergovernmental Network on Modern Slavery in Public Procurement to drive action to address modern slavery risks in public procurement at both Commonwealth and state and territory levels of government; and
- partnership with international counterparts through the Principles Steering Committee to support the implementation of the Principles to Guide Government Action to Combat Human Trafficking in Global Supply Chains, including participating in an International Contracting Officer's Forum on modern slavery hosted by the government of Canada.

Actions taken to identify, assess and respond to modern slavery in Commonwealth procurement and investments are reported annually in the Commonwealth Modern Slavery Statement published on the Modern Slavery Statements Register.

Further information, including the extent to which these initiatives involve partnership with state and territory governments, is included under action item 32.

Action item 8: Advocate for the promotion and protection of human rights, including adherence to international labour standards, in relevant international and regional forums

This action item was reported as complete in June 2025. Completion was endorsed by the IDC.

Over the life of the National Action Plan, the Australian Government (led by DFAT) worked to advance and promote respect for human rights through bilateral relationships, development assistance, engagement with civil society and engagement with regional and multinational forums. Further, the Australian Government facilitated visits by international dignitaries, such as the visit by the Special Rapporteur on Contemporary Forms of Slavery in November 2024. Much of the work to advocate for Australia's human rights priorities and bolster Australia's support for the international human rights system was undertaken by DFAT and other officers in forums such as the UN General Assembly and the UN Human Rights Council.

In addition, the Australian Government (led by the Department of Employment and Workplace Relations) promoted the ratification and implementation of, and adherence to, international labour standards. This primarily involved engagement with the ILO, including:

- participating in governance, policy and new international labour standard setting discussions at the triannual Governing Body meeting and annual International Labour Conference in Geneva);
- signing a Strategic Engagement Framework with the ILO to frame Australia's high-level priorities and engagement;
- engaging in the ILO Committee on the Application of Standards, which reviews cases of alleged breaches of ratified international labour conventions;
- providing resourcing for three years from 2025 for a Junior Professional Officer focused on addressing modern slavery, child labour and forced labour to the ILO Country Office for Pacific Island Countries in Suva; and
- funding the ILO Country Office for Pacific Island Countries in Suva to deliver a two-year \$500,000 grant project titled Promoting Implementation of ILO Standards in Pacific Island Countries.

Beyond engagement with the ILO, Australia participated in international and regional forums to promote and support integration of international labour standards within the Pacific region. These efforts are described under action item 38. Funding provided to international organisations for this reason is detailed under action item 39. Additionally, work undertaken to ratify the *Forced Labour Protocol* of 2014 is addressed under action item 9 and work undertaken to ratify the ILO's *Minimum Age Convention* is described under action item 10. Finally, the Australian Government has committed to adopting and promoting the *Principles to Guide Government Action to Combat Human Trafficking in Global Supply Chains* (see action item 11).

Action item 9: Progress ratification of the Forced Labour Protocol of 2014

Action item 9 was reported as complete in April 2022. Completion was endorsed by the IDC.

During 2021 and 2022, work was undertaken to ensure Australia's Commonwealth and state and territory legislation and related practice complied with the obligations of the *Forced Labour Protocol*. The protocol and a national interest analysis were then tabled in Parliament and referred to the Joint Standing Committee on Treaties. This committee subsequently held a public hearing, before recommending that Australia take binding treaty action. This was approved by the Federal Executive Council, which holds responsibility for ensuring that government decisions are documented and legally valid under the Australian Constitution. Australia's instrument of ratification was formally lodged with the ILO in March 2022 by the Australian Government. The ILO accepted the ratification and issued a certificate of deposit, completing the ratification process. The protocol came into effect in March 2023.

Action item 10: Progress ratification of the International Labour Organization's Minimum Age Convention (C138)

Action item 10 was reported as complete in June 2023. Completion was endorsed by the IDC.

In 2021 and 2022, work was undertaken to ensure Australia's Commonwealth and state and territory legislation and related practice complied with the obligations of the *Minimum Age Convention*. The convention and a national interest analysis were then tabled in Parliament in September 2022 and referred to the Joint Standing Committee on Treaties. This committee subsequently held a public hearing, before recommending that Australia take binding treaty action. This was approved by the Federal Executive Council. Australia's instrument of ratification was formally lodged with the ILO in June 2023 by the Australian Government. The ILO accepted the ratification and issued a certificate of deposit, completing the ratification process. It came into effect in June 2024.

Action item 11: Promote the Principles to Guide Government Action to Combat Human Trafficking in Global Supply Chains

Action item 11 was reported as complete in October 2024. Completion was endorsed by the IDC.

The principles were developed in September 2017, when the Governments of Australia, Canada, New Zealand, the United Kingdom and the United States, among others, endorsed a Call to Action to End Forced Labour, Modern Slavery and Human Trafficking. The principles provide a framework on which all countries can build a strategy to take effective action to prevent and eradicate human trafficking from public and private sector supply chains. They are intended to align with the UN Guiding Principles on Business and Human Rights. The principles were endorsed by the Australian Government in 2018.

The principles were promoted through three key strategies:

- implementation and promotion of relevant action items under the National Action Plan that give effect to the principles in Australia's domestic law, policy and practice. This included the implementation of the *Modern Slavery Act 2018* and promotion of associated guidance (action items 6, 35 and 44), advancing responsible recruitment policies and practices through Australia's comprehensive workplace legislation, introduction of criminal offences for serious labour exploitation, awareness-raising efforts, and exploration of how inter-jurisdiction legislative harmonisation may improve responses to modern slavery;
- promotion of the principles by AGD, DFAT and Australia's Ambassador to Counter Modern Slavery, People Smuggling and Human Trafficking in various international and domestic forums, workshops and publications. This included co-chairing the Bali Process Working Group on Trafficking in Persons, promoting the principles in the *Compendium of good practice examples to combat exploitation in supply chains*, facilitating meetings of the Interdepartmental Committee on Modern Slavery in Public Procurement and the Intergovernmental Network on Modern Slavery in Public Procurement, and holding the Australian Government's National Modern Slavery Conference 2023 (action item 37); and
- participation in the five-country Steering Committee established to support the implementation of the principles. The Steering Committee's purpose is to establish priorities, goals, activities and deliverables for each year. The Steering Committee is guided by strategic aims and terms of reference, and aims to meet quarterly.

The principles have consequently become embedded in Australia's response to modern slavery through legislation, policy, practice and advocacy.

National Strategic Priority 2: Disrupt, investigate and prosecute

Action item 12: Promote and distribute indicators of the different types of modern slavery

This action item was reported as complete in June 2023. Completion was endorsed by the IDC.

Indicators of modern slavery were primarily promoted and distributed through the AFP's LALD Program. This program aims to improve awareness of modern slavery and its indicators among frontline officers and is described in further detail under action item 14. In the public sphere, the AFP delivered media campaigns to raise awareness of modern slavery and its indicators, and also included extensive information on indicators of modern slavery on its website. Finally, the AFP employed Human Exploitation Community Officers during the life of the National Action Plan who connect with internal and external partners and the community to raise awareness of modern slavery and its indicators. This provides an opportunity for early identification of victims and intervention in modern slavery.

In addition, information on indicators of modern slavery was promoted and distributed to communities, including frontline responders, by recipients of the Modern Slavery Grants Program (see action items 2, 13 and 33).

Further relevant awareness-raising initiatives are described under action items 3 and 4, and education and training programs are described under action items 13, 14, 15 and 17.

Action item 13: Deliver training, resources and awareness-raising initiatives, in collaboration with civil society organisations, to a broad cross-section of frontline responders to support the identification and referral of victims and survivors, and the disruption of modern slavery practices. Frontline responders include law enforcement, workplace inspectors, education and health officials

This action item was reported as complete in October 2025. Completion was endorsed by the IDC.

In 2022, ThinkPlace were procured to undertake a training needs analysis to identify opportunities to enhance coordination and impact of training initiatives for frontline officials. The findings of the training needs analysis resulted in three high-level recommendations:

- lead national coordination with partners;
- establish communities of practice and fund targeted research; and
- develop, deliver and improve frontline responder training initiatives.

These recommendations informed the delivery of training and related activities under action item 13. These activities primarily targeted core frontline responders in law enforcement, education, healthcare and community sectors. Some activities may have targeted a broader cohort of frontline responders (eg community and cultural leaders, community and social workers, legal professionals, migration agents, supply chain managers and other related professions). Relevant activities undertaken by Australian Government agencies under action item 13 include:

- AFP's LALD Program (see action item 14) and Human Trafficking Investigations Course (see action item 16);
- Home Affairs' HTVF training, Overseas Preparation Program and targeted training for Human Trafficking Contact Officers, Field Compliance Officers and Visa Processing Officers (see action item 15);
- ABF's Airline Liaison Officer Virtual Training Course (see action item 15);
- CDPP's targeted training for prosecutors and Witness Assistance Service staff (see action item 17);
- FWO's tailored training for Fair Work Inspectors; and
- DSS's maintenance of the STPP Communications Manual, which assists the OWG and service providers to understand their roles and responsibilities regarding STPP clients.

The following training initiatives were also developed and delivered by grant recipients under the Modern Slavery Grants Program (see action item 33):

- *Let's talk: A holistic approach to preventing forced marriage within the Muslim community* (Australian Muslim Women's Centre for Human Rights)—a series of training programs delivered to frontline workers, including teachers, youth workers, social workers and family violence practitioners, as well as community members;
- *Work Right Hub* and *Work Right Hub 2.0* (Australian Red Cross)—training for frontline workers and community members to develop their knowledge and skills in responding to labour exploitation, and a guide for identifying modern slavery, reducing risk and referring suspected victims to support;
- *Safe and Empowered Families: A forced marriage prevention program* (Good Shepherd Australia New Zealand)—a comprehensive forced marriage training program delivered to over 300 participants from the community services sector;
- *Honour My Choice* (Taldumande)—training programs to prevent forced marriage and support children and young people affected by forced marriage, delivered to school staff, community service staff and young people;
- *Educating for Change: Preventing and responding to modern slavery amongst university students in pre-service courses* (Australian Catholic Religious Against Trafficking in Humans)—education modules for university students and staff to improve their ability to identify and respond to modern slavery in their fields (including social work, law, education, healthcare and university settings). The training can be tailored to the needs of specific sectors and is available to the broader community;
- *Developing and disseminating guidance and training materials to assist frontline workers, businesses and modern slavery survivors in taking a trauma-informed approach to preventing, identifying, and responding to modern slavery* (HerSpace)—a national guide, training module and other resources to support frontline workers in any discipline (including law enforcement) to implement a trauma-informed approach to preventing, identifying and responding to modern slavery;
- *Migrant Worker Modern Slavery Research Project, and Training for Evidence-Based Responses to Modern Slavery in Australia* (Migrant Justice Institute)—training on migrant workers' experiences of, and responses to, severe underpayment in Australia, delivered to frontline workers including education providers and agents, government agencies, diplomatic missions and community service providers;
- *Strategies to Prevent (SToP) Modern Slavery* (Settlement Services International)—guidance, resources and tools for frontline workers, community leaders and religious leaders to improve awareness of modern slavery, its risk factors and avenues for reporting and support;

- *Identifying and assisting modern slavery victim-survivors presenting as patients or working in public hospitals* (St Vincent's Hospital Melbourne)—training for frontline healthcare staff on identifying modern slavery indicators among survivors presenting to healthcare facilities, as well as training on recruitment of migrant healthcare staff from labour hire agencies; and
- *How to Optimise the Usability of an Emergency Department Modern Slavery Screening Process* (Sydney Local Health District)—education sessions to health professionals to build their capacity to identify and manage patients in situations of modern slavery.

Action item 14: Provide resources and deliver training for state and territory police officers to identify and refer cases of modern slavery to the AFP

This action item was reported as complete in July 2023. Completion was endorsed by the IDC.

In 2014, the AFP, in partnership with Victoria Police, developed the LALD Program. The LALD Program is an information and awareness-raising initiative that was designed to answer four questions:

- What is human trafficking?
- Where might I see human trafficking?
- What are the indicators of human trafficking?
- What do I do when I suspect human trafficking?

The LALD Program has since been further developed and now comprises in-field and external products, as well as online training modules for frontline staff.

In 2021, the AFP Commissioner and all state and territory police commissioners signed the National Policing Protocol, committing to a national framework for police services to prevent, detect and respond to all forms of HTMS (see action item 18). Under this protocol, all agencies committed to promoting awareness of HTMS, ensuring they had the capability to recognise and refer suspected cases, and allowing police personnel to access modern slavery training. Following the signing of the National Policing Protocol, all state and territory police agencies signed individual LALD Program licence agreements, allowing each agency to deliver the LALD Program within their organisations in a way that meets their needs. The AFP maintained responsibility for developing and maintaining a train-the-trainer package, which was successfully delivered to over 200 representatives throughout 2022 and 2023. The LALD Program has since been adopted by other frontline government agencies.

An evaluation of the LALD Program by Murdoch University has commenced and will explore the impact the program has had on reporting, its effectiveness at improving the knowledge base among frontline staff, and any barriers to implementing the program.

Action item 15: Expand existing training for ABF officers to identify and refer cases of modern slavery to the AFP, particularly in relation to serious labour exploitation

This action item was reported as complete in July 2025. Completion was endorsed by the IDC.

In 2020, ABF undertook a gap analysis on modern slavery training available to ABF and Home Affairs officers to ensure comprehensive and consistent training. ThinkPlace were subsequently procured to undertake a training needs analysis, to identify opportunities to enhance the coordination and impact of training initiatives targeted at frontline responders (described under action item 13). These analyses contributed to the continuation and expansion of training available to ABF officers, such as the ABF Airline Liaison Officer Virtual Training Course, the Home Affairs Overseas Preparation Program, the LALD Program, the AFP's Human Trafficking Investigations Course and Home Affairs' HTVF training program. Finally, the ABF's Human Trafficking Contact Officer Network, the National Human Trafficking Coordination team and the Human Trafficking Visa Program team delivered awareness-raising sessions to relevant internal and external stakeholder representatives.

Action item 16: Provide ongoing dedicated specialist resources to AFP officers to identify, disrupt and investigate cases of modern slavery

Action item 16 was reported as complete in June 2025. Completion was endorsed by the IDC.

Over the life of the National Action Plan, the AFP's National Human Trafficking Coordination team provided ongoing dedicated specialist resources to AFP officers to identify, disrupt and investigate cases of modern slavery through the Human Trafficking Investigations Course and the LALD Program.

The Human Trafficking Investigations Course is a specialist training program aimed at developing the skills and competencies of dedicated human trafficking investigators. The course teaches investigators about the human trafficking environment, investigative methodologies and options, multi-agency and international aspects, legislation, and victim liaison and support. It provides participants with the required knowledge and skills to advance their capability in areas critical to human trafficking and slavery investigations. The course is delivered to staff of the AFP, state and territory police, ABF and FWO.

The LALD Program aims to improve awareness of human trafficking and slavery, increase detection of cases and ensure their subsequent referral to the AFP for investigation, while improving assistance for victim-survivors. It is described in further detail under action item 14.

Finally, AFP resourcing to HTMS also includes specialist investigators located in or available to all capital cities; the provision of specialist operational, intelligence and training support to domestic and international law enforcement; and the ongoing review and enhancement of resources available to human trafficking investigators.

Action item 17: Provide resources and deliver training for prosecutors and lawyers on prosecuting and managing cases of modern slavery

Action item 17 was reported as complete in February 2024. Completion was endorsed by the IDC.

Between 2020 and 2023, the CDPP delivered a number of training sessions for prosecutors on prosecuting and managing cases of modern slavery. Training sessions were delivered in national and international forums and focused on human trafficking broadly, as well as specific issues including victim impact statements and reparation orders, victims of crime and the role of the CDPP's Witness Assistance Service, online child abuse offenders, and Divisions 270 and 271 of the Criminal Code.

Action item 18: Implement the National Policing Protocol to Combat Modern Slavery, which will guide cooperation between federal, state and territory law enforcement to detect and investigate modern slavery

Action item 18 was reported as complete in April 2022. Completion was endorsed by the IDC.

The National Policing Protocol was drafted by the AFP in collaboration with all state and territory police agencies. All agencies subsequently indicated their support ratifying the National Policing Protocol at the Australian and New Zealand Policing Advisory Agency and the Australia New Zealand Council of Police Professionalisation board meeting in November 2020. In March 2021, Reece Kershaw, then the AFP Commissioner, led the signing and ratification of the National Policing Protocol by all Australian police commissioners.

The protocol commits all state and territory police services to work in collaboration with the AFP to:

- combat modern slavery;
- promote awareness of modern slavery;
- maintain partnerships with government and NGOs;
- contribute to relevant intelligence products prepared by the Commonwealth, states and territories;
- ensure that suspected victims can access appropriate support and protection;
- allow police to access relevant and available training and education; and
- contribute to reviews of relevant legislation and regulatory regimes.

Action item 19: Undertake a targeted review of the modern slavery offences in Divisions 270 and 271 of the Criminal Code

Action item 19 was reported as complete in June 2023. Completion was endorsed by the IDC.

The *Targeted review of Divisions 270 and 271 of the Criminal Code Act 1995 (Cth)* was launched in 2022 by the Attorney-General of Australia. It was undertaken by the Modern Slavery and Human Trafficking Branch of AGD in collaboration with the AFP and the CDPP and involved significant consultation across the Australian Government. It was overseen by a Review Governance Group comprising representatives from AGD, the AFP and the CDPP.

This review included a three-month public consultation that took place from December 2022, when the Attorney-General released the targeted review discussion paper. During this time, AGD received 30 written submissions responding to the discussion paper and also held targeted consultation sessions with Australian, state and territory, and international government agencies, businesses and civil society. AGD also consulted with the Government's pilot SAC (see action item 31).

The final report was provided to the Attorney-General of Australia in June 2023 and was made public in August 2023 (AGD 2023). The review identified areas for possible legislative change to strengthen Australia's modern slavery offences in line with international good practice, to better reflect growing understanding about what modern slavery looks like and how it takes place in the Australian context, and to further future-proof Australia's offences so they remain sufficiently flexible to apply to new and emerging forms of modern slavery. Findings drew on feedback from stakeholders, as well as additional research and analysis of relevant international and comparative laws and practices, reports, academic literature and other sources.

The Australian Government has since considered the final report and agreed to develop potential legislative reforms to address the findings of this report. In 2025, AGD commenced targeted consultation on technical aspects to inform advice to government on potential legislative amendments.

Action item 20: Undertake a targeted review of Australia's visa framework, including to identify and reduce vulnerabilities to modern slavery

Action item 20 was reported as complete in June 2024. Completion was endorsed by the IDC.

The *Targeted review of Australia's visa framework to identify and reduce vulnerabilities to human trafficking and modern slavery* was undertaken by Home Affairs.

This review comprised four main activities:

- an in-depth desktop analysis of Australia's existing visa framework, focusing on visa programs that are vulnerable to abuse by human trafficking groups;
- mapping of the controls available to prevent, detect and disrupt cases of human trafficking;
- a literature review on international responses to human trafficking; and
- stakeholder consultations.

The final report was delivered to the Minister for Immigration, Citizenship and Multicultural Affairs before being publicly released in June 2024 (Department of Home Affairs 2024). The review specifically explored the department’s interaction with victims of human trafficking and modern slavery as they come in contact with Australia’s visa framework. The review found that Australia’s migration program and supporting visa system are substantially effective in regulating the entry, stay and departure of non-citizens, and in supporting identification of human trafficking indicators. However, it identified opportunities that may increase the likelihood of identification of suspected victims for referral to the AFP and/or providers of support. These include: increasing the scope of training provided to Home Affairs and ABF officers; capitalising on community outreach activities; identifying possible changes to policy, procedures and systems; and considering relevant legislative changes.

Action item 21: Deliver and fund overseas capacity-building activities to support the identification of victims and survivors, and the investigation and prosecution of modern slavery crimes

This action item was reported as complete in June 2025. Completion was endorsed by the IDC.

Over the life of the National Action Plan, the Australian Government delivered and funded overseas training and capacity building on legal and policy frameworks, law enforcement, migration and border management, effective prosecutions and witness support. Initiatives have supported the prevention, disruption, investigation and prosecution of modern slavery crimes, and the identification, support and protection of victims and survivors. This work has primarily occurred through Australia’s funding and co-management of the Bali Process Regional Support Office, a support mechanism for Bali Process members to engage in information sharing, capacity building and practical cooperation initiatives. In addition, relevant Australian Government agencies:

- contributed to international efforts to improve relevant legislation;
- delivered specialist human trafficking investigations training to international law enforcement agencies;
- delivered training and capacity building on broader migration and border management capabilities;
- engaged with international partners on good practices in prosecuting human trafficking and other forms of modern slavery, and supporting victims and witnesses;
- supported the delivery of frontline and community awareness-raising initiatives; and
- funded and co-delivered (with Fiji) the Pacific Perspectives: Combating Human Trafficking in the Pacific regional conference in 2023.

Relatedly, Australia has continued to increase funding for overseas anti-trafficking programs across the ASEAN and Pacific regions, as well as funding for global initiatives to contribute to the prevention of modern slavery. These activities are described under action item 39.

National Strategic Priority 3: Support and protect

Action item 22: Develop and distribute factsheets and resources on available support services and pathways on accessing support

This action item was reported as complete in March 2025. Completion was endorsed by the IDC.

In 2024, AGD developed a dedicated website to host new and existing information, tools and resources on modern slavery (Australian Government 2024). This website provides authoritative and factual information on modern slavery, including comprehensive information on how to get help or support someone else, available support services and pathways to access support. This is described in further detail under action item 4.

In addition, the Australian Government funds the STPP. Relevant factsheets and resources on the STPP and how to access it (ie by engaging with the AFP or support services as part of the ARP) are published on the DSS website. This includes information about accessing the STPP without engaging with the AFP through the ARP pilot, which commenced in July 2024. These resources were also provided on the Salvation Army's website and the DSS website. Similar materials were developed by Life Without Barriers, who began delivering the FMSSP in January 2025, and these are also published on the DSS website.

The Australian Government also funds Anti-Slavery Australia's My Blue Sky (Anti-Slavery Australia 2022), a website which provides information on how individuals can access support if they are at risk of forced marriage, if they are concerned for someone they know, or if they are frontline workers, including by providing access to interpreters.

Finally, a number of projects funded by the Modern Slavery Grants Program involved the development and distribution of factsheets and resources on available support services and pathways for accessing support, including the Australian Muslim Women's Centre for Human Rights, the Australian Red Cross and Taldumande Youth Services (see action item 33).

Action item 23: Develop a model for enhanced civil protection and remedies for individuals in, or at risk of, forced marriage

This action item was reported as complete in May 2025. Completion was endorsed by the IDC.

In 2023, the Forced Marriage Sub-Committee was established under the Family, Domestic and Sexual Violence Working Group of the Standing Council of Attorneys-General to develop options for a model to enhance available civil protections and remedies to prevent and respond to forced marriage. The sub-committee was chaired by AGD and comprised representatives from AGD, DSS, the AFP and state and territory justice, police and child protection agencies. The forced marriage civil society consultation group was subsequently established to provide expert advice on the government's work to prevent and respond to forced marriage, including work to progress action item 23. Following work undertaken by the Forced Marriage Sub-Committee, consultation through the forced marriage civil society consultation group, and a legislation and policy gap analysis undertaken by AGD, two models to enhance civil protections and remedies were developed. One option involved integrating enhanced protections into relevant state, territory and Commonwealth family and domestic violence frameworks, and the other involved establishing enhanced protections through Commonwealth legislation.

The two models were subsequently subject to a three-month public consultation. Over this time, AGD met with over 240 people from more than 130 organisations, including people with lived experience, and received 44 written responses. A high-level overview of the public consultation was published on the AGD website in late 2024. At the time of writing, the Standing Council of Attorneys-General were considering the preferred direction for a model to enhance civil protections and remedies for people in or at risk of forced marriage at their next meeting.

Action item 24: Implement the Protocol for the treatment of children suspected as victims of human trafficking, slavery or slavery-like practices

This action item was reported as complete in November 2025. Completion was endorsed by the IDC.

The *Protocol for the treatment of children with lived experience of human trafficking, slavery or slavery-like practices* (Children's Protocol) was developed based on:

- the pre-existing *Protocol for the treatment of children suspected as victims of human trafficking, slavery or slavery-like practices*, which was revised to ensure it aligned with current legislative requirements and practice standards; and
- consultations undertaken by DSS with internal and external stakeholders, including the OWG, state and territory child protection authorities, and service providers.

The Children's Protocol outlines guiding principles, roles and collaborative arrangements for supporting children who have experienced human trafficking, slavery or slavery-like practices. To ensure alignment with existing national frameworks, the Children's Protocol acknowledges intersections with the *National Plan to End Violence against Women and Children 2022–2032* and *Safe and supported: The National Framework for Protecting Australia's Children 2021–2031*. It has been implemented as an internal resource for OWG member agencies as well as relevant service providers.

Action item 25: Provide practical support and guidance to NGOs who are supporting victims and survivors, including through updating the Guidelines for NGOs: Working with trafficked people

This action item was reported as complete in June 2025. Completion was endorsed by the IDC.

This action item began with AGD disseminating a scoping paper to National Roundtable members about proposed updates to the *Guidelines for NGOs: Working with trafficked people*. The roundtable requested further research on the usefulness, usability and effectiveness of the *Guidelines for NGOs*. A public online survey was subsequently undertaken and completed by participants across government, NGOs, business and academia. Survey findings indicated a need to:

- broaden the target audience;
- update the presentation and content to provide practical advice and examples of good practice;
- strengthen content, including by providing information on trauma-informed practice and engagement with people who have lived experience of modern slavery; and
- improve dissemination and promotion of the updated guidelines.

These results were presented at the Senior Officials' Meeting of the National Roundtable in mid-2023, and National Roundtable members agreed to establish a working group to update the NGO Guidelines, chaired by Professor Jennifer Burn from Anti-Slavery Australia. Throughout 2024 the working group undertook extensive consultations and worked with people with lived experience of modern slavery and individuals and organisations working in the sector, to capture a diversity of views and expertise aligned with best practice principles and approaches. The newly developed document, *Practice guidelines for organisations: Working with people in or at risk of modern slavery*, was published on the Modern Slavery in Australia website in 2025 (National Roundtable on Human Trafficking and Slavery 2025).

Action item 26: Undertake a targeted review of support and legislative protections, defences and remedies available to modern slavery victims and survivors, particularly women and children, taking into account existing reviews and inquiries

This action item was reported as complete in November 2025. Completion was endorsed by the IDC.

Work under this action item included a stocktake of existing Commonwealth support and legislative protections, defences, and remedies available to victims and survivors of modern slavery, and related reviews and inquiries; and consultations with government agencies and members of the National Roundtable on specific focus areas identified in the stocktake (including the HTVF, support for Australians in or at risk of modern slavery overseas, implementation of the non-punishment principle and reparations). The outcomes of these activities were summarised in a final report, which also outlined key areas for future consideration. There were three key findings from the review:

- There is a wide range of information available about the supports, protections and remedies available to people in or at risk of modern slavery. These resources grew significantly during the life of the National Action Plan and were disseminated widely. Notwithstanding that some of these resources require time to fully reach their intended audience, opportunities exist to enhance outreach to rural and remote communities and cohorts at risk, leveraging cross-sector partnerships.
- While important, the criminal justice response is not the sole recourse available to people in or at risk of modern slavery. Civil supports and remedies complement the criminal justice response. There is scope to enhance awareness of and access to these measures.
- The limited data available on modern slavery hinders the ability to respond. Enhancing the evidence base is vital to improve existing policy and program responses.

Aligned with the findings, opportunities for future consideration identified by the review included:

- further strengthening Australia's evidence base on the prevalence and manifestations of modern slavery, including through lived experience engagement and cross-sector collaborations, to inform development of policies and programs;
- continuing cross-sector efforts and building private sector partnerships to disseminate resources relating to supports, defences and remedies available to people in or at risk of modern slavery;
- increasing frontline responders' uptake of training opportunities to better equip them to identify and refer suspected cases to law enforcement agencies and support services; and
- enhancing current arrangements to support and repatriate people in or at risk of modern slavery overseas, including documenting relevant agencies' roles and responsibilities for operational clarity and better information sharing, and bolstering information on the Smartraveller website.

The above opportunities will be considered by responsible agencies and steps will be taken to implement them as appropriate.

Action item 27: Undertake a review of state and territory victims of crime financial assistance schemes and their availability to victims and survivors of modern slavery

This action item was reported as complete in March 2025. Completion was endorsed by the IDC.

Activities undertaken as part of this action item included:

- a desktop review of state and territory victims of crime financial assistance schemes and other relevant literature;
- a questionnaire completed by states and territories about their schemes, followed by meetings with state and territory representatives;
- consultation with the National Roundtable; and
- consultation with the pilot SAC.

The report *Overview of state and territory victims of crime financial assistance schemes and their availability to victims and survivors of modern slavery* incorporated analyses of state and territory legislation, academic literature and feedback from consultations. It was published on the AGD website in February 2025 (AGD 2025b). The report summarised the availability of victims of crime financial assistance and compensation schemes to victims and survivors of modern slavery and examined differences in thresholds and definitions that may impact their availability. The report also highlighted differences between state and territory schemes in the amount of financial assistance and types of supports available and time limitations for making a claim. Finally, it identified that supports available to help victims and survivors to understand and access financial assistance differ between state and territory schemes.

Action item 28: Support businesses to improve pathways to effective remedies for victims and provide effective remediation in instances of modern slavery, through guidance and awareness-raising activities

This action item was reported as complete in December 2025. Completion was endorsed by the IDC.

This action item involved the development of a Modern Slavery Remediation Toolkit, which provides guidance material for businesses to consider when developing modern slavery remediation policies and improving pathways to remediation. It was developed by AGD in consultation with people with lived experience of modern slavery and their representatives, and government and non-government stakeholders. The toolkit was subsequently published on the Modern Slavery Statements Register (AGD 2026).

Businesses were also provided with guidance about effective remedies for victims and survivors during the Modern Slavery Conference in 2023 (see action item 37). This conference was themed ‘Taking Action Together’ and focused on cross-sector collaboration and partnership to strengthen modern slavery responses. The conference explored topics including modern slavery trends and estimates, people-centred and people-led responses, ethical recruitment, responsible sourcing and procurement, and remedy.

Further work was also undertaken by grant recipients under the Modern Slavery Grants Program (see action item 33):

- *Modern Slavery Impact Initiative* (Global Compact Network Australia)—provided information to business, including information on identifying and remediating modern slavery, through a series of forums, training modules and resources;
- *Improving the Regulation of Modern Slavery and Access to Remedy: Learning from Experience* (UNSW Sydney)—engaged reporting entities to the *Modern Slavery Act 2018* interested in strengthening business practices to identify modern slavery risk and implement remedy by publishing reports including the report *Good practice toolkit: Strengthening modern slavery responses*, which examined best practice examples of remediation (Nolan et al. 2023); and
- *Migrant Worker Modern Slavery Research Project, and Training for Evidence-Based Responses to Modern Slavery in Australia* (Migrant Justice Institute)—provided recommendations to government on how to ensure that migrant workers who have been underpaid can access remedy in their report *Off the books: Inside Australia’s hidden system of migrant worker exploitation* (Berg & Farbenblum 2026).

National Strategic Priority 4: Partner

Action item 29: Work collaboratively with states and territories to ensure complementary approaches to combating modern slavery in Australia

This action item was reported as complete in March 2025. Completion was endorsed by the IDC.

In consultation with the IDC, AGD developed an internal report that outlined touchpoints and existing collaboration between Australian, state and territory governments, and identified opportunities to enhance this partnership. Existing partnerships related to modern slavery include the Standing Council of Attorneys-General and its working groups, Police Minister's Council, Serious and Organised Crime Coordination Committee, Women and Women's Safety Ministerial Council and working groups, Intergovernmental Network on Modern Slavery in Public Procurement, meetings of workplace relations ministers, National Workplace Relations Consultative Council, and the Criminology Research Advisory Council. These and other partnerships have facilitated collaboration and complementary approaches to combating modern slavery in Australia, including:

- collaborating on actions to address and mitigate modern slavery risk in public procurement (see action items 7 and 32);
- working with frontline responders to improve identification of those in or at risk of modern slavery and support them, particularly through the joint delivery of the LALD Program (see action items 13, 14 and 15);
- participating in reviews of modern slavery offences in Divisions 270 and 271 of the Criminal Code (see action item 19) and state and territory victims of crime financial assistance schemes and their availability to victims and survivors of modern slavery (see action item 27);
- developing a model for enhanced civil protection and remedies for individuals in or at risk of forced marriage (see action item 23);
- developing the *Practice guidelines for organisations: Working with people in or at risk of modern slavery* (see action item 25) and the *Modern slavery lived experience engagement and empowerment: Values, principles and practical guidance to support trauma-informed engagement and empowerment in Australia* (see action item 31); and
- progressing ratification of the *Forced Labour Protocol* of 2014 (see action item 9) and the ILO's *Minimum Age Convention* (see action item 10).

Action item 30: Develop a strategy for Commonwealth cooperation with state and territory governments on modern slavery, building on existing cooperation and networks in states and territories

This action item was reported as complete in November 2025. Completion was endorsed by the IDC.

The strategy was developed based on insights from the report produced under action item 29. This report outlined touchpoints and existing collaboration between Australian and state and territory governments, and identified opportunities to enhance this partnership. The strategy aimed to enhance Commonwealth engagement and collaboration with states and territories and inform the national response to modern slavery. It sets out principles of effective cooperation and focus areas for future cooperation, and provides examples of how these could be operationalised in practice. Ongoing collaboration and cooperation between Commonwealth and state and territory agencies and law enforcement will be undertaken in line with the principles of cooperation and focus areas described in the document. The Commonwealth will continue to develop targeted strategies to guide engagement with jurisdictions on specific bodies of work as required.

Action item 31: Develop a Victim and Survivor Engagement and Empowerment Strategy

This action item was reported as complete in March 2025. Completion was endorsed by the IDC.

The report *Modern slavery lived experience engagement and empowerment: Values, principles and practical guidance to support trauma-informed engagement and empowerment in Australia* was designed to help organisations seeking to engage with and empower people with lived experience of modern slavery in Australia. It contains values, principles and practical guidance to help them do this in ways that are safe, ethical and trauma informed. The development of the strategy was informed by consultation with the pilot SAC, who advised the government on what the strategy could look like, including how to best model safe and ethical engagement, and how this could be implemented in large forums. Further consultations were undertaken with members of the National Roundtable and people with lived experience of modern slavery. The strategy was published online in late 2025.

Relevant work was also undertaken by the following Modern Slavery Grants Program projects (see action item 33):

- *Lived Experience Engagement Program and Strengthening and connecting survivor voices in Australia* (Salvation Army)—developed an evidence-based, survivor-endorsed framework for ethical and effective government engagement with survivors of modern slavery, the Lived Experience Engagement Program. This program allows survivors to connect with each other and provides training around wellbeing and engagement with government. The development of the SAC further enables paid engagement with government on modern slavery policy and practice for Lived Experience Engagement Program participants. The Lived Experience Engagement Program supports survivors in this engagement by assisting with preparation, debriefing, access to interpreters and training, and by providing funding for travel and childcare costs. Government and civil society may also receive training on how to effectively engage with modern slavery survivors;
- *Improving the Regulation of Modern Slavery and Access to Remedy: Learning from Experience* (UNSW Sydney)—engaged reporting entities to the *Modern Slavery Act 2018* interested in strengthening business practices to identify modern slavery risk and implement remedy by publishing reports including *Good practice toolkit: Strengthening modern slavery responses*, which examined best practice approaches to meaningful engagement with stakeholders and suppliers (Nolan et al. 2023); and
- *Worker Led Empowerment* (Project Respect)—provided recommendations on best practices for engagement with people with lived experience, as well as how to better support victims and survivors' recovery in the report *Learning from experience: The role of economic empowerment in preventing exploitation* (Survivor Connections, Fair Futures & Project Respect 2026).

Action item 32: Work collaboratively across Commonwealth departments and agencies to combat modern slavery risks in Commonwealth procurements and investments

This action item was completed in April 2025. Completion was endorsed by the IDC.

Key activities undertaken in fulfilment of this action item included:

- establishing the Interdepartmental Committee on Modern Slavery in Public Procurement with a focus on uplifting Commonwealth capability to assess and manage modern slavery risk in procurement and contract management activities;
- developing tools and guidance in collaboration with Commonwealth agencies to assist non-corporate Commonwealth entities to assess and address modern slavery risks in their procurements and investments;
- facilitating presentations, workshops, working groups and conferences to increase understanding and awareness of modern slavery risks in Commonwealth procurements and investments and to promote the Modern Slavery Toolkit for Procurement Officers; and
- coordinating five annual Commonwealth Modern Slavery Statements, reporting on Australian Government actions to identify, assess and address modern slavery risks in Commonwealth procurement and investments.

Work to address modern slavery risks in Commonwealth procurements and investments was also undertaken through existing interdepartmental and broader forums, including the National Roundtable, IDC, MSEAG (see action item 35) and the Research Network (see action item 43).

These activities contributed to the development of strong relationships between Commonwealth departments and agencies which foster ongoing collaboration, information sharing and stakeholder contribution to tools and resources developed to combat modern slavery risks in Commonwealth procurements and investments.

Action item 33: Provide funding and practical support through domestic grants programs to combat modern slavery

Action item 33 was reported as complete in July 2023. Completion was endorsed by the IDC.

The 2020–21 Budget committed \$4.4m in multi-year grants for civil society, business and academics to deliver projects to prevent and respond to modern slavery. These grants were delivered across two rounds, following assessment of applications by the Selection Advisory Panel, comprising representatives from AGD, AFP, AIC and DSS. Successful projects focused on developing awareness-raising, capacity-building, prevention and intervention strategies and supported action items 2, 3, 4, 6, 13, 22, 31, 41 and 42 of the National Action Plan. In 2021, \$1.67m was awarded to seven organisations for the following projects:

- *Let's talk: A holistic approach to preventing forced marriage within the Muslim community*—a community-based prevention project to raise awareness, build capacity and strengthen family resilience to prevent forced marriage within the Muslim community in Australia (delivered by the Australian Muslim Women's Centre for Human Rights);
- *Work Right Hub*—a digital platform aimed at preventing and addressing criminal labour exploitation in Australia which includes information and tools to help migrants find support if they or someone they know is being exploited at work, as well as resources, tools and training for frontline responders to better identify and respond to labour exploitation (delivered by the Australian Red Cross);
- *Modern Slavery Impact Initiative*—a project which aimed to support Australian businesses reporting under the *Modern Slavery Act 2018* and their suppliers to collectively tackle modern slavery. This project involved holding a series of forums and developing resources to assist business to adopt a collaborative and multi-stakeholder response to modern slavery (delivered by the Global Compact Network Australia Limited);
- *Safe and Empowered Families: A forced marriage prevention program*—a project which aimed to develop, trial and evaluate an innovative international model of support to prevent forced marriage in Australia (delivered by Good Shepherd Australia New Zealand);
- *Lived Experience Engagement Program*—a program which aimed to empower survivors of criminal labour exploitation to use their lived expertise to inform positive change (delivered by the Salvation Army);

- *Honour My Choice*—a program which aimed to prevent forced marriage and support children and young people affected by forced marriage by offering trauma-informed and culturally sensitive wrap-around case management, as well as educational resources for schools and frontline community workers (delivered by Taldumande Youth Services); and
- *Improving the Regulation of Modern Slavery and Access to Remedy: Learning from Experience*—a research project that sought to improve understanding of modern slavery risks in global supply chains by identifying which sectors have a high risk of modern slavery and how risk factors differ across sectors (delivered by UNSW Sydney).

In 2023, \$2.73m was delivered to 13 organisations or individuals for the following projects:

- *Educating for Change: Preventing and responding to modern slavery amongst university students in pre-service courses*—a program which aimed to develop and roll out a micro-credentialled course to raise awareness of modern slavery indicators among Australian university staff and pre-service students of frontline industries (delivered by Australian Catholic Religious Against Trafficking in Humans);
- *Shaping Futures: Prevention programs for young Muslim women*—an initiative which aimed to deliver tailored prevention and support programs to young Muslim women to reduce vulnerability to and risk of forced marriage (delivered by the Australian Muslim Women's Centre for Human Rights);
- *Work Right Hub 2.0*—a project which aimed to develop and update existing resources on the Work Right Hub targeting different sectors and new audiences, including those in regional and rural communities (delivered by the Australian Red Cross);
- *Developing and disseminating guidance and training materials to assist frontline workers, businesses and modern slavery survivors in taking a trauma-informed approach to preventing, identifying, and responding to modern slavery*—a project which aimed to develop guidance, training materials and resources for frontline workers, businesses and modern slavery survivors around modern slavery, trauma and its impacts, the recovery process, the provision of trauma-informed care to survivors, and their relevance to the continuum of modern slavery responses (delivered by HerSpace);
- *Everyday Slavery*—a research project which aimed to explore how consumers engage with four different approaches to anti-slavery activism on social media (delivered by Kyla Raby, an anti-slavery researcher and practitioner);
- *Migrant worker modern slavery survey project, and training for evidence-based responses to modern slavery in Australia*—a project which aimed to empower at-risk migrant workers with tailored information on legal protections and reporting; to create the first largescale dataset on migrant workers' experiences of modern slavery indicators; and to deliver materials and training to frontline officials in universities and the international education sector, diplomatic missions, business and investors (delivered by Migrant Justice Institute);
- *Worker Led Empowerment*—a project which aimed to empower specific migrant communities by building capacity, creating peer groups of workers in the massage industry and promoting workplace empowerment to combat isolation (delivered by Project Respect);

- *Enhancing Modern Slavery Transparency and Disclosure: Artificial Intelligence Applications to Accelerate the Reading and Benchmarking of Businesses' Modern Slavery statements*—a research project to develop artificial intelligence solutions to leverage machine learning for reviewing business compliance with *Modern Slavery Act* requirements (delivered by the Queensland University of Technology);
- *Strengthening and connecting survivor voices in Australia*—a project which aimed to expand the Lived Experience Engagement Program, an evidence-based and ethical model to support the Australian Government's engagement with victims and survivors of modern slavery and human trafficking to inform national policy (delivered by the Salvation Army);
- *Strategies to Prevent (SToP) Modern Slavery*—a project which aimed to improve awareness and implement prevention strategies among vulnerable individuals and communities in New South Wales, Queensland and Victoria, using bilingual frontline staff and engaging women in co-designing culturally appropriate training resources and strategies (delivered by Settlement Services International);
- *Identifying and assisting modern slavery victim-survivors presenting as patients or working in public hospitals*—a project which aims to raise awareness and build capacity in the healthcare sector for potential survivors and migrant health staff through training and establishment of a peer group. It also aims to develop digital online modules with pilots delivered in two phases in Victoria and New South Wales (delivered by St Vincent's Hospital Melbourne);
- *How to Optimise the Usability of an Emergency Department Modern Slavery Screening Process*—a research project to assess the usability of modern slavery screening processes in Australian emergency departments; analyse the effectiveness, efficiency and user satisfaction of an implemented modern slavery screening process; and raise awareness of modern slavery among the healthcare community and beyond (delivered by the Sydney Local Health District); and
- *Honour My Choice*—a nationwide expansion of an early intervention and direct support program that built on the accommodation, casework and education/outreach program already delivered for children and youth at risk of or experiencing forced marriage, and to support victim-survivors of forced marriage by providing training, education and resources for schools and frontline workers (delivered by Taldumande Youth Services).

During the life of the National Action Plan, the Australian Government continued to support efforts to respond to modern slavery by funding the Australian Red Cross to deliver the STPP and Life Without Barriers to deliver the FMSSP. Funding was also provided to the Salvation Army to deliver the ARP. Finally, the Australian Government funded Anti-Slavery Australia's Speak Now project, which aimed to prevent forced marriage and other forms of modern slavery through education and awareness raising, as well as the My Blue Sky forced marriage support service.

Action item 34: Review the terms of reference, structure and membership of the National Roundtable on Human Trafficking and Slavery to support continued effective consultation on modern slavery issues

During the National Action Plan, feedback was sought from members of the National Roundtable on its terms of reference, structure and membership. Feedback from these consultations indicated a desire for expanded membership, for state and territory efforts to be integrated into the national response to modern slavery, and for people with lived experience to have ethical and equitable participation. The terms of reference were subsequently updated to reflect this feedback. Specifically, the revised terms of reference included:

- reframed purpose and objectives that reflect strategic priorities to address all forms of modern slavery, not only human trafficking;
- specific integration of state and territory efforts, including frontline responses, community services and public sector procurement policy and practice;
- greater clarity on governance, with detailed description of the National Roundtable's method of operation, roles and responsibilities; and
- expanded membership to include people with lived experience, the Australian Anti-Slavery Commissioner, the NSW Anti-slavery Commissioner, International Justice Mission and Life Without Barriers.

The revised terms of reference took effect in December 2025.

Action item 35: Consult the Modern Slavery Expert Advisory Group and other civil society and business stakeholders to support effective implementation of the Modern Slavery Act

Action item 35 was reported as complete in August 2022. Completion was endorsed by the IDC.

The MSEAG was established in May 2020 to provide strategic advice to government to support the effective implementation and operation of the Act. The MSEAG has met quarterly since its establishment. Consultation with the MSEAG has focused on:

- driving compliance;
- developing supplementary guidance and aids for reporting entities;
- increasing usability of the Modern Slavery Statements Register; and
- providing advice on the Commonwealth Modern Slavery Statement to strengthen the Government's actions to identify and address modern slavery risks.

Further to engagement with the MSEAG, the Australian Government has continued to consult with the National Roundtable, as well as businesses, peak bodies, academia and civil society organisations.

Action item 36: Develop a Modern Slavery Recognition Scheme to highlight innovative and collaborative business and civil society actions to address modern slavery risks in supply chains

This action item was reported as not progressing in December 2025. This decision was endorsed by the IDC.

The objective underpinning this action item was to raise the profile of the *Modern Slavery Act 2018*, recognise high performing businesses and highlight best practice compliance with the *Modern Slavery Act 2018*. Following consultation with government and non-government stakeholders and research into existing Australian and international awards and related schemes, it was determined that the policy intention of this action item had already been met. This, coupled with the associated cost of implementing a recognition scheme, resulted in the determination that delivery of the action item should not be progressed. This was agreed to by the Attorney-General and subsequently communicated to the Prime Minister.

AGD will continue to look for opportunities to promote good business practice to address modern slavery risk, potentially including:

- promoting good industry practices at the National Roundtable;
- presenting good practices of modern slavery statements as part of the Australian Government's annual report to Parliament on the implementation of the *Modern Slavery Act*; and
- highlighting good industry practices contained in modern slavery statements on the Modern Slavery Statements Register.

Action item 37: Host a National Modern Slavery Conference to bring together civil society, business and other relevant stakeholders to drive action to tackle modern slavery

Action item 37 was reported as complete in July 2023. Completion was endorsed by the IDC.

In June 2023, AGD, in partnership with the AIC, delivered the National Modern Slavery Conference in Melbourne. The conference theme, 'Taking Action Together', focused on cross-sector collaboration and partnership to strengthen modern slavery responses. The conference explored topics including modern slavery trends and estimates, people-centred and people-led responses, ethical recruitment, responsible sourcing and procurement, and remedy. The conference also reflected on the operation of the *Modern Slavery Act* and the role of a forthcoming federal Anti-Slavery Commissioner. There were over 400 in-person attendees and 80 online attendees, including representatives from government, business, civil society, academia, advocates and victim-survivors. Findings from a post-event survey found that attendees ($n=201$) were satisfied with the conference (90%), learnt new information that would facilitate their work (89%), made new connections with others working in the space (87%) and strengthened their existing connections (87%). Feedback from the conference will be used to inform future stakeholder events and forums.

Action item 38: Promote effective and coordinated international and regional responses to modern slavery in line with the International Strategy on Human Trafficking and Modern Slavery

This action item was reported as complete in June 2025. Completion was endorsed by the IDC.

Throughout the life of the National Action Plan, the Australian Government engaged bilaterally, regionally and multilaterally to promote effective and coordinated responses to modern slavery, in line with Australia's *International engagement strategy on human trafficking and modern slavery: Delivering in partnership* (DFAT 2022). Australia's international engagement on human trafficking and modern slavery aimed to:

- increase understanding across sectors of modern slavery, advocate for action, and identify and highlight the tools available to help;
- support and strengthen systems in our region that detect, prevent and respond to modern slavery; and
- address the drivers, both specific and general, by investing in development and advocating for systemic change.

Australia advocated for effective and coordinated responses to modern slavery in multilateral forums including the UN Human Rights Council, the UN General Assembly, the ILO, Alliance 8.7, and the Bali Process. This work was led by DFAT and the Ambassador to Counter Modern Slavery, People Smuggling and Human Trafficking, who regularly met with people with lived experience, civil society, business and academics.

Further, Australia co-chairs the Bali Process with Indonesia, and also co-chairs a number of its work streams. These include:

- the Working Group on Trafficking in Persons, co-chaired with Indonesia, which promotes more effective and coordinated law and justice responses to human trafficking (including for the purpose of forced labour) in the Asia-Pacific region;
- the Task Force on Planning and Preparedness, co-chaired with Indonesia, which aims to improve the region's preparedness for irregular migration events and to support collaboration to respond effectively to urgent forced migration events;
- the Technical Experts Group on Returns and Reintegration, co-chaired with the Philippines, which supports information sharing on returns and reintegration, including key policy initiatives, trends and issues, and identification of opportunities for cooperation and capacity building; and
- the Government and Business Forum, co-chaired with Indonesia, which provides a strategic platform for cross-sector collaboration to address forced labour and human trafficking challenges, bringing together influential business leaders and ministers from across the Bali Process membership (see action item 6).

In addition, Home Affairs funds and co-manages the Bali Process Regional Support Office, which serves as the technical and operational support mechanism for Bali Process members, delivering policy development, capacity building and practical cooperation initiatives. In 2023, the Australian Government contributed \$2.7m to the Regional Support Office.

Finally, effective and coordinated international responses to modern slavery are promoted through Australia’s bilateral capacity-building initiatives (see action item 21) and investigative assistance provided to international law enforcement agencies.

Action item 39: Provide funding to overseas anti-trafficking programs

Action item 39 was reported as complete in September 2024. Completion was endorsed by the IDC.

Throughout the life of the National Action Plan, the Australian Government continued and increased its funding for anti-trafficking programs across the ASEAN and Pacific regions, and for global initiatives. This included:

- \$80m for the ASEAN-ACT initiative between 2018 and 2028, which continues Australia’s commitment to strengthening justice responses to human trafficking, the implementation of the *ASEAN Convention against Trafficking in Persons, especially Women and Children among ASEAN Member States*, and supports partnership and cooperation at the regional and national levels;
- \$24m for the TRIANGLE in ASEAN Program between 2015 and 2025. TRIANGLE in ASEAN is implemented by the ILO and co-funded by Canada. The program supports safe and informed migration within the ASEAN region to protect the rights of migrant workers and reduce their vulnerability to trafficking;
- \$3.2m for the ASEAN Convention against Trafficking in Persons, Especially Women and Children (ACTIP) Implementation Program between 2018 and 2022. The implementation program supports cross-sectoral work in ASEAN to implement the convention and is managed by the Asia Foundation;
- \$3.04m for the Pacific Islands Transnational Organised Crime project being delivered by the UN Office on Drugs and Crime, which aims to increase data collection, support Pacific governments to accede to and implement international conventions, strengthen labour standards and enforcement, raise awareness of the impacts of trafficking and slavery-related organised crime on women and girls, and increase security capacity;
- \$1.6m for relevant UN Voluntary Trust Funds, including \$1.1m between 2022–23 and 2024–25 for the Office of the High Commissioner for Human Rights Voluntary Trust Fund on Contemporary Forms of Slavery, and \$500,000 between 2022–23 and 2023–24 for the UN Office on Drugs and Crime’s Voluntary Trust Fund for Victims of Trafficking in Persons, Especially Women and Children;
- approximately \$4.9m for various projects to combat modern slavery and human trafficking through DFAT’s Direct Aid Program and Australian NGO Cooperation Program. This funding included investments to: strengthen protections against forced labour in Timor-Leste, Cambodia and Bangladesh; protect migrant workers in Thailand and South Asia; raise awareness of and combat child marriage and child labour in Afghanistan and across multiple African states; and counter human trafficking in Nepal;

- investments to counter child, early and forced marriage overseas, including \$667,000 for Pacific Women Lead between 2020–21 and 2023–24 and \$7.5m for the Towards Universal Sexual and Reproductive Health and Rights in the Indo-Pacific program between 2023–24 and 2024–25;
- approximately \$1.8m for the Australia–Malaysia Comprehensive Strategic Partnership between 2023 and 2026, to build capability in areas such as institutional and economic reform, including strengthening governance, fostering research and policy innovation to support economic resilience, and countering human trafficking; and
- \$500,000 for the ILO’s Pacific Office over 2.5 years between 2022 and 2024 to strengthen labour standards in the Pacific.

The Australian Government also funded and delivered training and capacity-building programs in collaboration with international counterparts to respond to modern slavery overseas (see action item 21).

National Strategic Priority 5: Research

Action item 40: Establish a Monitoring and Evaluation Framework for the National Action Plan to enhance data collection and information sharing between government agencies, and with business and civil society organisations

Action item 40 was reported as complete in February 2022. Completion was endorsed by the IDC.

In March 2020, the ABF commissioned the AIC to develop a Monitoring and Evaluation Framework (the Framework) to guide the evaluation of the National Action Plan. The purpose of the Framework was to support the Government’s efforts to deliver its commitments articulated in the National Action Plan, and to inform the evaluation of the National Action Plan. It further ensured that all government agencies with responsibilities under the National Action Plan were aware of their intended involvement in evaluation activities, limiting the need for subsequent data sharing and related agreements.

The Framework was drafted in 2021, drawing upon consultation transcripts and written submissions provided during the development of the National Action Plan. The AIC subsequently undertook their own consultation on the draft Framework with relevant government agencies, law enforcement, civil society organisations, businesses and academics. The Framework was also distributed to IDC members for feedback. Approval was subsequently provided in February 2022.

The current evaluation of the National Action Plan has been undertaken in line with the Framework.

Action item 41: Undertake research on modern slavery in Australia through the Government's Human Trafficking and Modern Slavery Research Program

Action item 41 was reported as complete in October 2024. Completion was endorsed by the IDC.

The Human Trafficking and Modern Slavery Research Program is one of the AIC's core research priorities. Relevant research undertaken during the life of the National Action Plan explored the following topics:

- support needs of sexual exploitation victim-survivors (Boxall et al. 2023);
- the nature of modern slavery cases that come to the attention of authorities and their attrition through the criminal justice system (Lyneham 2021); and
- commercial exploitation of children (eg Brown, Napier & Smith 2020; Cubitt, Napier & Brown 2021; Gannoni et al. 2024, 2023; Napier, Teunissen & Boxall 2021a, 2021b; Teunissen et al. 2022; Teunissen, Cahill et al. 2024; Teunissen & Napier 2023, 2022; Teunissen, Thomsen et al. 2024).

In addition, the AIC developed the NMDS, an administrative dataset that links information about suspected victim-survivors and perpetrators of modern slavery offences in Australia from DSS, Home Affairs, CDPP and the AFP. To date, the AIC has released three NMDS reports. These relate to the pilot period of 1 July to 31 December 2022 (Gannoni & Bricknell 2024), as well as 2022–23 (McDonald & Bricknell 2025) and 2024–25 (Bricknell & McDonald 2025).

All research undertaken by the AIC has been published on the AIC's website and has been presented across various conferences, seminars and other forums.

Action item 42: Provide funding to academics, civil society and industry to undertake research on modern slavery in Australia

Action item 42 was reported as complete in September 2024. Completion was endorsed by the IDC.

Research and evaluation projects were primarily funded under the Australian Government's Modern Slavery Grants Program (see action item 33). Under this program, the Australian Government committed \$4.4m in multi-year grants to 20 projects focused on awareness-raising, capacity-building, prevention and intervention strategies, to be undertaken by civil society, business and academia. Funded research projects included:

- *Improving the Regulation of Modern Slavery and Access to Remedy: Learning from Experience* (Dinshaw et al. 2022; Marshall et al. 2023; Nolan et al. 2023; Sinclair & Dinshaw 2022);
- *Migrant Worker Modern Slavery Research Project, and Training for Evidence-Based Responses to Modern Slavery in Australia* (Berg & Farbenblum 2026);
- *Worker Led Empowerment* (Survivor Connections, Fair Futures & Project Respect 2026); and
- *Enhancing Modern Slavery Transparency and Disclosure: Artificial Intelligence Applications to Accelerate the Reading and Benchmarking of Businesses' Modern Slavery Statements* (Queensland University of Technology).

The AIC provided further funding to civil society and academia to undertake research on modern slavery in Australia. This included funding to Project Respect, Australian Red Cross and Agora Consulting to contribute to research on the support needs of sexual exploitation victim-survivors (Boxall et al. 2023).

Research undertaken or funded by the Australian Government has been disseminated via a range of forums. These include:

- publication of research findings (eg on the AIC's website and the Research Network's database);
- meetings of the Research Network (see action item 43);
- meetings of the National Roundtable, IDC and OWG;
- the National Modern Slavery Conference 2023 (see action item 37);
- AIC conferences in 2022 and 2025; and
- AIC research seminars and webinars.

Action item 43: Establish a research network to advance and promote collaboration on modern slavery research

Action item 43 was reported as complete in June 2023. Completion was endorsed by the IDC.

The Research Network was established in 2022 to promote the dissemination of research about HTMS in Australia and to assist the Australian Government in its response to modern slavery by strengthening the evidence base to inform policy and program design. The Research Network is convened by the AIC and meets twice a year. The purpose of meetings is to discuss and seek feedback from members on proposed research, to present findings from completed projects and to explore areas for further research and partnership. In addition to regular meetings, the AIC administers the Active Project Register, a publicly available catalogue of research projects on modern slavery. The Research Network is open to individuals affiliated with an Australian or state and territory government department, NGO, business or research institution. Membership is by invitation or nomination from an existing member.

Action item 44: Monitor and report on the implementation of the Modern Slavery Act, including through annual reports to Parliament

This action item was reported as complete in March 2025. Completion was endorsed by the IDC.

Over the life of the National Action Plan, AGD has monitored the implementation of the Act through the following mechanisms:

- managing the Modern Slavery Statements Register;
- monitoring the compliance of reporting entities;
- capturing data and trends seen on the Register within each reporting cycle; and
- identifying best practice modern slavery reporting under the Act.

In addition, there has been ongoing reporting on the implementation of the *Modern Slavery Act* through annual reports tabled in Parliament. These reports include a ministerial foreword and highlight implementation action and outcomes over the reporting period and key priorities for the next calendar year. Information is provided on actions undertaken related to four workstreams, including:

- supporting entities to understand their compliance obligations under the Act;
- awareness raising and promotion of best practice responses to modern slavery;
- developing and maintaining an ongoing Modern Slavery Statements Register; and
- combating modern slavery risks in public sector procurement.

Information on the implementation of the Act has also been reported to relevant domestic and international forums (eg the MSEAG).

Relatedly, the *Modern Slavery Act* underwent a statutory review of its operation and compliance with the Act over the first three years of its operation (see action item 45).

Action item 45: Undertake a review of the operation of the Modern Slavery Act in 2022

Action item 45 was reported as complete in July 2023. Completion was endorsed by the IDC.

In accordance with s 24 of the *Modern Slavery Act 2018*, the Australian Government undertook a 12-month review of the Act's operation and compliance over its first three years. The review was undertaken by Professor John McMillan AO and supported by AGD.

The review included a three-month public consultation that took place from August 2022, following the release of an issues paper. During this time, the review received:

- 136 written submissions from domestic and international stakeholders;
- 30 responses to an online questionnaire that contained 27 consultation questions featured in the issues paper;
- 496 responses to the online survey of reporting entities; and
- 38 targeted consultations with 285 organisations including business, government, civil society, academic, unions, charities, peak bodies and professional associations.

Consultation was also undertaken with members of the pilot SAC.

The final report was tabled in Parliament and made public in May 2023 (McMillan 2023). The review resulted in 30 recommendations to make the administration of the Act more effective. Key recommendations related to legislative changes (eg amendments to the reporting criteria, penalties for specific noncompliance, a due diligence obligation on entities, and a mechanism to declare certain matters as high risk), expanding guidance material for the Act, and enhancing the Modern Slavery Statements Register.

The *Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Act 2024* came into effect on 7 November 2024. These amendments to the *Modern Slavery Act* established the Australian Anti-Slavery Commissioner, set out the Commissioner's functions and dealt with other matters relating to the role of the Commissioner.

On 2 December 2024, the Government released its response to the review report, agreeing in full, in part or in principle to 25 of the 30 recommendations. From July 2025 to April 2026, AGD undertook stakeholder consultations as part of its implementation of the Government's response to the review. Approximately 630 stakeholders were consulted via 24 workshops, with over 200 submissions and written comments received. Stakeholders included representatives of industry, investors, civil society, unions, academics, workers, and people with lived experience of modern slavery. Findings from the consultations will inform the Government's consideration of any future measures to enhance Australia's response to modern slavery in supply chains.

Action item 46: Publish modern slavery statements produced under the Modern Slavery Act on a public online register and provide business with guidance on compliance and good practice trends

This action item was completed in November 2024. Completion was endorsed by the IDC.

Part 2 of the *Modern Slavery Act 2018* established a national modern slavery reporting requirement for reporting entities. Reporting entities are defined under s 5 of the Act. The national modern slavery reporting requirement obliges reporting entities (including the Commonwealth) to identify and address their modern slavery risks and maintain responsible and transparent supply chains. Entities required to report must prepare annual modern slavery statements, and approved statements are published on the Australian Government's Modern Slavery Statements Register, a public website that promotes transparency and accountability among reporting entities, supporting compliance with the *Modern Slavery Act* (AGD 2026). It allows all stakeholders to easily navigate and search for submitted statements, thereby facilitating access to essential information.

There were five primary activities that contributed to the completion of this action item:

- publishing approved modern slavery statements on the Modern Slavery Statements Register;
- releasing and updating guidance material on compliance with the *Modern Slavery Act* to ensure it remains responsive to the evolving risk environment, emerging risk practices and expanded regulatory approaches;
- providing advice and information on compliance and good practice trends (see also action items 6 and 44);
- providing advice to reporting entities via the Modern Slavery Statements Register Helpdesk; and
- providing education, information and advice to reporting entities via stakeholder engagement activities including attendance at forums, conferences and meetings.

In addition, the quality of modern slavery statements is assessed by Monash University annually and the resulting reports are published on their website (Pham, Cui & Ruthbah 2025, 2024a, 2024b, 2022, 2021).

AIC reports

Consultancy report

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