

Submission  
No 41

**INQUIRY INTO MODERN SLAVERY RISKS FACED BY  
TEMPORARY MIGRANT WORKERS IN RURAL AND  
REGIONAL NEW SOUTH WALES**

**Organisation:** Office of the Australian Anti-Slavery Commissioner

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Australian Anti-Slavery Commissioner

# **Submission to the NSW Inquiry into modern slavery risks faced by temporary migrant workers**

28 February 2025

# Australian Anti-Slavery Commissioner

Australia's inaugural Anti-Slavery Commissioner, Chris Evans, was appointed in November 2024 following an Act of Parliament establishing the Office in May 2024. The primary purpose of Australian Anti-Slavery Commissioner (the Commissioner) is to further strengthen Australia's efforts to address slavery and trafficking by providing an independent pillar to Australia's comprehensive response. The Commissioner also provides national leadership in raising awareness of modern slavery risks and an independent mechanism for victims and survivors, business, and civil society to engage on issues and strategies to address modern slavery.

The Commissioner [exercises several functions](#) under the [Modern Slavery Act 2018 \(Cth\)](#) to address modern slavery, including promoting compliance with the Act. The Commissioner's key areas of work in addressing modern slavery include:

- education and awareness raising
- supporting and engaging with people with lived experience of modern slavery
- supporting Australian businesses to address risks of modern slavery in their operations and supply chains
- advocacy and research.

The New South Wales Anti-Slavery Commissioner (NSW Commissioner), Dr James Cockayne, has been leading efforts in the state for over two years. The Commissioner recognises and appreciates the efforts of Dr Cockayne to highlight the issue of exploitation of migrant workers, including through the publication of the *Be Our Guests* report in 2024. The NSW Commissioner will consequently be better positioned to lead reforms recommended by this Inquiry. That said, many of the challenges facing temporary migrant workers are matters for the Commonwealth and these will be priorities for the Commissioner. As the Commissioner's Office prepares for broad consultations to inform his Strategic Plan, some core work areas already identified include strengthening the criminal justice response to modern slavery, enhancing support services available to victim-survivors and nationally-consistent labour hire licensing and regulation. This submission provides the Commissioner's perspective and recommendations on actions that New South Wales, and other states, can take to complement the work of the Commonwealth to address and prevent vulnerability to modern slavery.

## Introduction

The issue of migrant worker exploitation has rightly drawn the focus of a number of state and federal parliamentary inquiries over the past decade. Noteworthy progress has been made in response to these to improve workplace protections for temporary migrant workers and reduce their vulnerability to labour exploitation. In parallel to these reforms, actions under the *National Action Plan to Combat Modern Slavery* have been implemented to raise awareness and increase pathways to support for victim-survivors.

Nevertheless, ongoing detection of exploitation with indicators of various forms of modern slavery across a range of industries indicates there is more work to be done. Significant structural vulnerabilities exist in temporary migrant worker frameworks; and the number of victims being identified is significantly less than our best estimates of the likely scale of the problem. Illustrating this is the 2019 report by the Australian Institute of Criminology (AIC), which estimated that for every one victim identified, four remain undetected.<sup>1</sup>

While Australia has kept pace, and in some instances, led international efforts to better protect migrant workers,<sup>2</sup> the detection and disruption of slavery-related crimes is falling behind.<sup>3</sup> This has a direct impact on vulnerability. The lack of current, publicly-available data around investigations, prosecutions and case outcomes is a particular challenge, making it more difficult to comprehend the nature and potential scale of the problem and appropriate solutions. Efforts have been made through the Australian Minimum Dataset;<sup>4</sup> however, this project is due to conclude in 2025 with no confirmed plans for ongoing research. There is also a broader question of importance to the Commissioner around how this and other research on Australia's response to modern slavery is translated into policy and practice.

Evidence put to past inquiries into modern slavery risks has identified multifaceted challenges requiring better training for first responders and better coordination for cross-agency interventions at and between federal and state agencies and with civil society. In examining the risks to modern slavery faced by temporary workers, this submission addresses measures that can be taken at the state level to:

- reduce vulnerability and enhance access to support, advice and justice; and
- enhance accountability for perpetrators of modern slavery and workplace exploitation.

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<sup>1</sup> Samantha Lyneham, Christopher Dowling and Samantha Bricknell (2019) [Estimating the dark figure of human trafficking and slavery victimisation in Australia](#).

<sup>2</sup> Bassina Farbenblum and Laurie Berg (2021) [Migrant Workers' Access to Justice for Wage Theft: A Global Study of Promising Initiatives](#).

<sup>3</sup> US Department of State, Trafficking in Persons Office (2024) [Trafficking in Persons Report 2024 - Australia](#).

<sup>4</sup> Alexandra Gannoni Samantha Bricknell (2024) [Findings from the Human Trafficking and Modern Slavery National Minimum Dataset pilot, July to December 2022](#).

## Worker Vulnerability

The vulnerabilities experienced by temporary workers are well-documented in the literature and through previous parliamentary inquiries. Several vulnerability factors manifest within the origin country, including limited work opportunities, natural disasters, poverty and little to no social protection. Together, these conditions act as push factors that spur the migration journey. Limited pathways for safe migration coupled with gaps in understanding about rights and obligations for workers make migrants particularly susceptible to false promises of employment and opportunity.

Within destination countries, like Australia, vulnerability factors include fear and mistrust of authorities and limited access to independent legal advice and social support. Compounding these are gaps in the system response including poor understanding by authorities of the victimology of this crime type, as well as operational tensions between border control and worker protection policies. For example, victims are often coached and/or threatened to prevent them from reporting to and cooperating with law enforcement officials. However, anecdotal reports indicate officials have, at times, misconstrued victims' reluctance to share the truth or full details of their circumstances as dishonesty or uncooperativeness.

Undocumented workers, who may have been deceived or coerced into illegal work face unique barriers to reporting over legitimate fear of deportation. Leveraging this fear is a well-documented and highly effective tactic used by traffickers globally: to prevent victims from seeking help from authorities. A greater understanding by first responders of common victim and perpetrator behaviours would greatly enhance efforts to detect and address exploitation and slavery.

The perceived and actual impunity of perpetrators who, historically, have not faced significant penalties is another factor that indirectly fosters vulnerability by eroding workers' confidence in the system. Consequently, workers often choose to remain in exploitative conditions rather than bear the personal risk of reporting to authorities where the outcome is uncertain.<sup>5</sup>

Notable progress has been made over the past decade to improve workplace and reporting protections for migrant workers.<sup>6</sup> The announcement of a new Migrant Workers Centre in NSW also provides an important avenue for the provision of accessible and culturally sensitive information and support to migrant workers, to reduce their isolation and vulnerability and improve their ability to resist and report situations of exploitation.

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<sup>5</sup> Marie T. Segrave (2017) [Exploited and Illegal: Unlawful migrant workers in Australia](#). Monash University.

<sup>6</sup> Department of Home Affairs (2024) [New workplace justice measures for migrants](#); Fair Work Ombudsman [Visa Protections – Pilot Programs](#).

Further progress can be made if law enforcement authorities at both state and federal levels prioritise making reporting safe and beneficial for victims of exploitation and reducing the risks to migrant workers in coming forward. This includes ensuring that workers who have been exploited have immediate access to support and remedies and that workers are supported to access immigration advice and support to regularise their immigration status where needed. In particular, workers and service providers should be informed about the availability of various safeguards, including re-engagement on labour mobility programs and access to the Workplace Justice Visa for workers to remain and work in Australia whilst pursuing a workplace exploitation claim.

Law enforcement authorities and other first responders should also be aware of the Strengthening Reporting Protections Pilot, which aims to ensure workers on temporary visas who have experienced exploitation do not have their visas cancelled if they report exploitation or support an investigation into their employer. The new Migrant Workers Centre will also be an important site for the provision of information and advice on these issues.

## Perpetrator Accountability

New South Wales has been, and continues to be, a top jurisdiction for slavery-related reports, accounting for approximately one third of national referrals to the Australian Federal Police (AFP) each year. Of the 382 reports made to the AFP in the 2024 financial year,<sup>7</sup> 118 were in the state of New South Wales, second only to Victoria, which received 124 reports.<sup>8</sup> The Human Trafficking and Modern Slavery National Minimum Dataset Pilot, which covered the period from July to December 2022, indicates a historical trend, with 35% (N=52) of modern slavery-related reports to the AFP being made in New South Wales.<sup>9</sup>

While referrals have steadily risen, the number of prosecutions is comparatively low, both within New South Wales and across Australia. The most recent report by the Interdepartmental Committee on Human Trafficking and Slavery,<sup>10</sup> published in 2020, reported only 25 individuals had been convicted under Divisions 270 and 271 of the Commonwealth *Criminal Code*, eight of which were in New South Wales. The majority of these cases involved sexual servitude. Concerningly, the Commissioner's Office could not confirm the number of current criminal matters relating to temporary migrant workers.

In the face of significant research and anecdotal evidence of conditions of forced labour among migrant workers,<sup>11</sup> the relatively few prosecutions for forced labour suggest that these cases are both under-detected and under-prosecuted. The AIC 2021 report *Attrition of human trafficking and slavery cases through the Australian criminal justice system*<sup>12</sup> highlighted the challenges of successfully prosecuting human trafficking and modern slavery cases, including victim identification and cooperation, victim credibility and evidentiary difficulties, the complexity of legislation and lack of training and experience of investigators and prosecutors. The report noted that victims of labour exploitation were the least likely to identify and acknowledge their victim status. However, the report also noted that once engaged in the criminal justice process, labour exploitation victims were perceived as more willing to cooperate because of the motivation to recover lost income.

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<sup>7</sup> Australian Federal Police (2024) [National Wrap: AFP Keeping Australians Safe in 2024](#).

<sup>8</sup> Australian Federal Police National Human Trafficking Team, personal communication, 24 February 2025.

<sup>9</sup> Alexandra Gannoni Samantha Bricknell (2024) [Findings from the Human Trafficking and Modern Slavery National Minimum Dataset pilot, July to December 2022](#).

<sup>10</sup> Attorney-General's Department. [Human Trafficking: Australia's Response](#)

<sup>11</sup> Laurie Berg and Bassina Farbenblum (2017) [Wage Theft In Australia: Findings of the National Temporary Migrant Work Survey](#); Marie T. Segrave (2017) *Exploited and Illegal: Unlawful migrant workers in Australia*. Monash University; Department of Employment and Workplace Relations (2019) [Report of the Migrant Worker Taskforce](#); NSW Anti-Slavery Commissioner (2024) [Be Our Guests: Addressing Urgent Modern Slavery Risks for Temporary Migrant Workers in Rural and Regional New South Wales](#).

<sup>12</sup> Samantha Lyneham (2021) [Attrition of Human Trafficking and Slavery Cases through the Australian Criminal Justice System](#).

This highlights the importance of remedy in the criminal justice response to labour exploitation, and of ensuring that exploited workers are informed of their rights to remedy and supported to access remedy through both criminal and civil frameworks. Ensuring that exploited workers are paid wages and benefits that are owing to them is fundamental to the protection of their rights as workers, but also significantly contributes to their recovery and reducing their vulnerability to further exploitation. It is also a key tool for accountability and ensuring that perpetrators are unable to benefit financially from exploitative labour. It is critical that first responders are aware of the range of remediation options available to exploited workers, including remedies available through civil proceedings and complaints to the Fair Work Ombudsman.

The AIC's attrition report also noted the challenges posed by lack of training, experience and exposure among criminal justice practitioners, including the issue of staff mobility among investigators. The lack of operational training and experience, together with the inability to sustain multi-agency relationships as a result of staff mobility, weakens the criminal justice response and undermines the confidence and trust of victims in law enforcement agencies. Greater commitment of resources and trained and dedicated personnel are required to support and sustain the highly complex investigations required for trafficking and slavery offences, particularly those involving migrant workers in regional areas.



## Opportunities to Improve the System Response

### *Preparing First Responders*

While modern slavery has, historically, been a federal responsibility, local and state first responders are best positioned to detect and respond to cases of modern slavery. State police are well placed to identify victim-survivors when responding to domestic or workplace disputes and when survivors attend police stations to seek help. Similarly, the health sector is a recognised and under-utilised point of intervention. For example, one study published 15 years ago found that 28% of trafficked women saw a health care professional while still in a situation of trafficking.<sup>13</sup> A 2016 study reported that 68% of participants (i.e. persons who experienced human trafficking) confirmed that they visited a health care provider while being exploited.<sup>14</sup>

In light of this evidence, we note and support the extensive work of the NSW Commissioner to mobilise and equip healthcare workers across the NSW healthcare system to better identify, refer and assist people experiencing or at risk of modern slavery. The NSW Commissioner's partnership with NSW Health is an Australian first and should be a model for other states to enhance critical capabilities in a sector recognised as an early point of intervention.

Beyond this collaboration, however, it is concerning to read in the NSW Commissioner's last Annual Report that none of the 32 Government departments and agencies engaged for the Report's preparation were mandating training for frontline workers. We agree with the NSW Commissioner's assessment that such training is "explicitly anticipated" by section 19(3) of the *Modern Slavery Act 2018* (NSW) and should be actioned as a priority.

Expanded and more consistent training for state-based responders would significantly enhance Australia's response to modern slavery. This training should incorporate indicators of trafficking, slavery and severe exploitation; referral pathways for support and remedy; and information about the victimology of this crime type that influences how victim-survivors behave and interact with helping systems. Further, it is vital this training is codesigned and co-delivered with victim-survivors so trainees can develop a firsthand understanding of the human impact of the crime and how their engagement can contribute to recovery and access to various forms of justice.<sup>15</sup>

We also note the extensive training undertaken by NSW Police to enforce new coercive control laws.<sup>16</sup> Given the widespread use of coercion within slavery-related crimes, the state should

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<sup>13</sup> Tiffany Dovydaitis (2010) [Human Trafficking: The Role of the Health Care Provider](#).

<sup>14</sup> Makini Chisolm-Straker, Susie Baldwin, Bertille Gaïgbé-Togbé, Nneka Ndukwe, Pauline N. Johnson, Lynne D. Richardson (2016) [Health Care and Human Trafficking: We are Seeing the Unseen](#)

<sup>15</sup> Lilly Yu, Jeanette Hussemann, Hanna Love, Evelyn McCoy, and Colleen Owens (2018) [Alternative Forms of Justice for Human Trafficking Survivors](#)

<sup>16</sup> Lia Harris (2024) [NSW Police Investigating More than 80 Cases of Coercive Control, with Senior Officers Tasked to Enforce New Domestic Violence Laws](#).

explore how this training may be leveraged and, where necessary, extended for officers likely to encounter criminal labour exploitation. Additionally, it would be helpful for NSW Police to fast-track this training for investigators stationed in high-risk regional areas and to maintain records of officers who have completed this training so they may be prioritised for deployment to investigate suspected labour exploitation cases. The AFP's 'Look a Little Deeper' and 'Human Trafficking Investigator' course, which are periodically available to a range of law enforcement officials, provide additional avenues to prepare state police officers to respond to slavery-related cases.

### ***Multi-Agency Collaboration***

A wide body of research has identified how place-based frameworks for multi-agency collaboration yield greater detection and prosecution of slavery crimes,<sup>17</sup> improved access to training and case coordination protocols,<sup>18</sup> greater balance between prosecution and protection priorities<sup>19</sup> and enhanced support services to victim-survivors.<sup>20</sup> A place-based approach provides an evidence-based way to reduce vulnerability by strengthening the institutional response to slavery-related crimes.

Illustrating this, one U.S. study found: *"The federal government has provided strong national leadership in the fight against human trafficking, but responses from local law enforcement remain essential to the successful identification and investigation of these crimes. Municipal, county and state police are familiar with their local communities and are involved in routine activities that will likely bring them into contact human trafficking victims and offenders....Effectively responding to human trafficking requires local law enforcement officers to recognize potential victimization and provide services to victims who may have been historically under-served by or had poor relationships with law enforcement (e.g., migrants, immigrant community member, and poor women and girls)."*

Similar research by the Office of the Independent Anti-Slavery Commissioner and the University of Nottingham's Rights Lab identified a high demand for increased coordination of partnership

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<sup>17</sup> Amy Farrell, Jack McDevitt, Rebecca Pfeffer, Stephany Fahy, Colleen Owens, Meredith Dank and William Adams (2012) [Identifying Challenges to Improve the Investigation and Prosecution of State and Local Human Trafficking Cases](#).

<sup>18</sup> Amy Farrell, Jack McDevitt and Stephanie Fahy (2008) Understanding and Improving Law Enforcement Responses to Human Trafficking. <https://www.ncjrs.gov/pdffiles1/nij/grants/222752.pdf>.

<sup>19</sup> Annie Fukushima and Cindy Liou (2012) [Weaving Theory and Practice: Anti-Trafficking Partnerships and the Fourth 'P' in the Human Trafficking Paradigm](#).

<sup>20</sup> Office of the Independent Anti-Slavery Commissioner and the University of Nottingham's Rights Lab (2017) [Collaborating for Freedom: Anti-Slavery Partnerships in the UK](#).

work at a national, regional and local level.<sup>21</sup> Partnerships surveyed for the report identified emerging good practice in the areas of learning, awareness raising, support for victims and survivors, joint operations, governance and training. Notably, the research also uncovered gaps in consistency, resources and evaluation to inform 'good practice'.

In 2018, that research culminated in the publication of a dynamic online Anti-Slavery Partnership Toolkit to help practitioners through the sharing of resources and good practice examples and to inspire action and prevent duplication.<sup>22</sup> This toolkit includes a partnership checklist to guide membership, terms of reference and survivor engagement. It also provides a governance library and extensive resources and training materials. Importantly, the toolkit has been developed to inform collaboration with stakeholders beyond the criminal justice response, including businesses reporting under modern slavery legislation.

While efforts have been made to enhance cross-agency coordination, Australia's approach remains highly centralised at the federal level, with no nationally-consistent, place-based framework through which to drive key anti-slavery measures. Nor is there a national framework to engage the breadth of civil society organisations and service providers who are not formally attached to a government-funded initiative, such as the Support for Trafficked People Program. Within NSW, the NSW Commissioner has indicated there is no standing whole-of-government anti-slavery coordination mechanism driving implementation of the NSW *Modern Slavery Act*.<sup>23</sup>

This Inquiry provides an opportunity for NSW to lead an inclusive, well-coordinated and evidence-based response to improve detection and support for individuals in the community who are experiencing or vulnerable to modern slavery. Importantly, such an approach would facilitate trust-building with key migrant and diaspora communities—an essential component of any strategy intended to reduce migrant worker vulnerability.

### ***Labour Hire Licensing and Regulation***

The lack of labour hire regulation poses a major risk in the NSW response to labour exploitation and, potentially, modern slavery. There is significant risk of impacts in Victoria and Queensland, given the porous nature of state borders; we suggest the Committee explore these risks further with the Victorian and Queensland Labour Hire Authorities.

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<sup>21</sup> Office of the Independent Anti-Slavery Commissioner and the University of Nottingham's Rights Lab (2017) [Collaborating for Freedom: Anti-Slavery Partnerships in the UK](#).

<sup>22</sup> Office of the Independent Anti-Slavery Commissioner [Anti-Slavery Partnership Toolkit](#).

<sup>23</sup> NSW Anti-Slavery Commissioner (2024) [Engaging for Freedom: NSW Anti-slavery Commissioner's Annual Report Financial Year 2023–2024](#), p10.

It is well-documented that risks of severe exploitation and modern slavery among migrant workers are exacerbated where unscrupulous labour hire providers are engaged.<sup>24</sup> Robust models of labour hire regulation in Australia, such as the Victoria Labour Hire Authority, and abroad, such as the United Kingdom's Gangmasters and Labour Abuse Authority,<sup>25</sup> demonstrate the key role that labour hire regulators can play in preventing and addressing the exploitation of migrant workers. National regulation of the labour hire industry is broadly supported by business groups, including the Australian Fresh Produce Alliance,<sup>26</sup> AusVeg,<sup>27</sup> the National Farmers Federation,<sup>28</sup> and the Business Council of Australia.<sup>29</sup>

In 2022, the Federal Government signalled its commitment to develop a nationally consistent labour hire scheme and regulator. After a series of consultations with the states, Victoria was selected as the host jurisdiction for establishing a model law and the National Labour Hire Licensing Regulator. Now in its sixth year of operation, the Victoria Labour Hire Authority (the Authority) has achieved significant progress to block rogue operators from entering the market,<sup>30</sup> thus creating a more level playing field for the industry. The Authority has also enhanced the detection of rights abuses commonly experienced by temporary migrant workers, including underpayment of wages and other entitlements; sham contracting; unreasonable deductions; and sub-standard accommodation.<sup>31</sup> As several cases demonstrate, the Authority is not just detecting issues but is also actively facilitating remedy for affected workers, successfully seeking repayments for breaches of the *Labour Hire Licensing Act 2018*.<sup>32</sup>

Given the success of Victoria and other states with licensing arrangements, NSW should commence adequate preparation for elements of the harmonised scheme that require state-based implementation. As identified in the recent McKell Institute report, *Licensing Labour Hire*,<sup>33</sup> such a scheme should be specifically directed towards protecting vulnerable workers, and should provide regulators with the power and resources to share real time data and proactively monitor and enforce licensing requirements. Crucially, the scheme should ensure that workers are able

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<sup>24</sup> Department of Employment and Workplace Relations (2019) [Report of the Migrant Worker Taskforce](#).

<sup>25</sup> [UK Gangmasters and Labour Abuse Authority](#).

<sup>26</sup> Australian Fresh Produce Alliance (2020) [Media Release: National Labour Hire Licensing Vital Amid Workforce Shortages](#).

<sup>27</sup> AusVeg (2024) [Australian Vegetable Industry Welcomes Announcement of National Labour Hire Registration Scheme](#).

<sup>28</sup> National Farmers Federation (2019) [NFF Horticulture Council Names Its Five Election Priorities](#).

<sup>29</sup> Business Council of Australia (2023) [Response to DEWR Consultation Paper on National Labour Hire Regulation](#).

<sup>30</sup> Victorian Labour Hire Authority (2024) [High-impact outcomes, and more licensed providers than ever – progress in 2023-24](#)

<sup>31</sup> Victorian Labour Hire Authority (2024) [Labour Hire Authority Annual Report 2023-24](#).

<sup>32</sup> Victorian Labour Hire Authority Media Releases: [Labour Hire Provider Agrees to Refund Workers for Sub-Standard Accommodation; Provider pays workers and exits industry after LHA investigation](#). See also [Labour Hire Authority Annual Report 2023-24](#), Case study – LHA audit condition leads to rectification of \$310,000 underpayment to workers, p19 and Case study – Notice to comply required superannuation and tax be paid / withheld, p22.

<sup>33</sup> McKell Institute (2025) [Licensing Labour Hire: Promoting a national labour hire licensing scheme which protects Australian horticulture workers and supports businesses](#), p23-25.

to easily and safely report grievances, and that entities that have engaged in exploitative practices are publicly identified and restricted from holding licenses. Should the Federal process encounter any barriers to commencement, we encourage the NSW Government to proceed with establishing a state Labour Hire Regulator, modelled on the Victorian Labour Hire Authority.

## Conclusion

This submission provides three core recommendations to advance New South Wales' response, and through it, other states' responses to worker vulnerability to modern slavery. The Commissioner looks forward to working closely with the NSW Commissioner and other stakeholders to find a feasible pathway forward to reform. As signalled in the Introduction, the Commissioner will be prioritising several work areas that will align with and support the states to assume a greater role in combatting modern slavery across Australian communities. These work areas will include advocating for greater engagement of state police and work health and safety regulators in the next *National Action Plan to Combat Modern Slavery*. We also intend to work through the Standing Council of Australian Government Attorneys-General and Health Minister processes to build consensus toward a more integrated response. Noting the importance of diversifying pathways out of exploitation to address the many barriers to reporting and help-seeking, the Commissioner will actively support the sustainability of trial initiatives such as the Workplace Justice Visa and Additional Referral Pathway Program, funded by the Commonwealth Department of Social Services.

The Commissioner commends the Committee for convening this Inquiry and would be pleased to provide further information on request.

## Recommendations

1. Strengthen collaboration between state and Commonwealth agencies and between government agencies and victim service providers. The NSW Commissioner's Office provides the basis to establish a framework for enhanced, place-based collaboration to drive training and capacity building and other activities targeting worker vulnerability. Another supporting framework is the National Policing Protocol between the AFP and State Police Commissioners and other agencies to ensure cross-agency coordination to better refer and support the needs of trafficking victims.
2. Support and expand the work of the NSW Commissioner to engage and equip first responders to identify and assist people who have experienced labour exploitation. Expand survivor-informed training for NSW police and other first responders. We note AFP's 'Look a Little Deeper' Training Program and Human Trafficking Investigators Course provide two resources. We further note research by the AIC which identified areas to strengthen training for criminal justice stakeholders.<sup>34</sup>
3. Prepare to adopt labour hire licensing legislation and support a harmonised approach through a national scheme based on the Victorian model.

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<sup>34</sup> Samantha Lyneham (2021) [Attrition of human trafficking and slavery cases through the Australian criminal justice system.](#)