



CHARTERED ACCOUNTANTS™
AUSTRALIA + NEW ZEALAND

14 January 2020

Australian Border Force
Via email: humantraffickingandslavery@abf.gov.au

Dear Sir or Madam

National Action Plan to Combat Modern Slavery 2020-24

Chartered Accountants Australia and New Zealand supports the Australian Government's National Action Plan to Combat Modern Slavery 2020-24 ("the National Action Plan") and we welcome the opportunity to provide a submission to the Public Consultation Paper. The Appendix provides more information about Chartered Accountants Australia and New Zealand (CA ANZ).

Feedback on proposed goals

We support the 12 proposed goals of the National Action Plan. However, with respect to goal 9, there are already mandatory reporting requirements under the Modern Slavery Act 2018 (Cth Act) and also under the Modern Slavery Act 2018 (NSW Act). This dual layer of regulation has caused confusion in the business community, and the latter is currently being reviewed by the Standing Committee on Social Issues.

We recommend that proposed goal 12 '*work collaboratively across government, along with non-government stakeholders, to combat modern slavery*' is expanded to include collaboration with the states and territories, potentially via the Council of Australian Governments (COAG). We consider active engagement and collaboration between the Commonwealth and the states and territories is critical in order for the National Action Plan to be successful.

Further, we strongly support the independent Anti-Slavery Commissioner (the Commissioner) introduced under the NSW Act. The Commissioner plays an important role in promoting transparency and accountability for combating modern slavery risks in supply chains by supporting and educating businesses as well as raising awareness amongst the community and supporting victims.

The Commissioner has a number of tasks including to monitor reporting concerning risks of modern slavery occurring in supply chains of government agencies and commercial organisations and to raise community awareness of modern slavery.¹ To support proposed goal 2 '*Engage the Australian community to understand and combat modern slavery*' and goal 9 '*Promote transparency and accountability for combating modern slavery risks in global supply chains, including in Government procurement*', we suggest the Government encourages similar state-based support systems (the role of the Commissioner under the NSW Act could be replicated in each state).

Should you have any questions about the matters discussed in this submission or wish to discuss them further, please contact Karen McWilliams via email at karen.mcwilliams@charteredaccountantsanz.com or phone (612) 8078 5451.

Yours sincerely

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Group Executive
Advocacy & Professional Standing

Karen McWilliams FCA
Business Reform Leader
Advocacy & Professional Standing

¹ [Modern Slavery Act 2018 No 30](#)

Appendix

About Chartered Accountants Australia and New Zealand

Chartered Accountants Australia and New Zealand (CA ANZ) represents more than 125,000 financial professionals, supporting them to build value and make a difference to the businesses, organisations and communities in which they work and live.

Around the world, Chartered Accountants are known for their integrity, financial skills, adaptability and the rigour of their professional education and training.

CA ANZ promotes the Chartered Accountant (CA) designation and high ethical standards, delivers world-class services and life-long education to members and advocates for the public good. We protect the reputation of the designation by ensuring members continue to comply with a code of ethics, backed by a robust discipline process. We also monitor Chartered Accountants who offer services directly to the public.

Our flagship CA Program, the pathway to becoming a Chartered Accountant, combines rigorous education with practical experience. Ongoing professional development helps members shape business decisions and remain relevant in a changing world.

We actively engage with governments, regulators and standard-setters on behalf of members and the profession to advocate in the public interest. Our thought leadership promotes prosperity in Australia and New Zealand.

Our support of the profession extends to affiliations with international accounting organisations. We are a member of the International Federation of Accountants and are connected globally through Chartered Accountants Worldwide and the Global Accounting Alliance. Chartered Accountants Worldwide brings together members of 13 chartered accounting institutes to create a community of more than 1.8 million Chartered Accountants and students in more than 190 countries. CA ANZ is a founding member of the Global Accounting Alliance which is made up of 10 leading accounting bodies that together promote quality services, share information and collaborate on important international issues.

We also have a strategic alliance with the Association of Chartered Certified Accountants. The alliance represents more than 870,000 current and next generation accounting professionals across 179 countries and is one of the largest accounting alliances in the world providing the full range of accounting qualifications.