

Dear Committee,

**The Modern slavery Bill 2018 does not effectively address slavery in Australia**

This bill offers nothing substantive in terms of controlling slavery beyond the dubious benefit of getting NGOs, traders and consumers to stigmatise others who appear not to have eliminated slavery from their supply lines. There are no effective sanctions against organisations shown to be directly involved in slavery.

Furthermore, it does not touch an important cause of slavery in Australia: prostitution. While the bill does mention child prostitution, no specific consideration appears addressing prostitution by adults, and yet it is this prostitution, whether legal, decriminalised or illegal, which is shown repeatedly to be associated with slavery practiced by pimps, brothel keepers and traffickers linked to organised crime. This bill turns a blind eye to Australia's most widespread and compelling instance of slavery.

One related industry apparently not considered in the drafting of the bill is online provision of accommodation. It appears that organised crime uses this service to run brothels in communities, on a short term basis, thus evading laws controlling their presence and (when legal) zoning.

The UK's All-Party Parliamentary Group inquired into prostitution and the world sex trade, and published their report earlier this year, '*Behind Closed Doors*', on sexual exploitation in England and Wales.

[ <https://www.aph.gov.au/DocumentStore.ashx?id=52a9e723-d084-4ca4-86da-b35553fad177&subId=406184> ]

The report expresses concern about Airbnb and Booking.com: "*Organised crime groups move women around as a way of controlling women and evading the police.*"(p17). Plainly, they could move prostituted children around, as well.

I do not know whether the online accommodation booking industry is sufficiently profitable to fall within the financial guidelines of the Bill's reporting requirements. In any case, do you believe that stigmatisation of Airbnb and Booking.com or other short-term letting sector businesses will have any influence on traffickers using these services?

The report recommends "*The Government should establish a national register of landlords and issue guidance on preventing sexual exploitation for the short-term letting sector.*" (page 24) I endorse that recommendation wholeheartedly. If I had an Airbnb rental property, I would not want it used for organised prostitution.

I hope that the government sees fit to amend this legislation so that it impacts slavery associated with prostitution in every Australian state and territory. I will leave the details of those amendments to concerned legislators.

Sincerely,  
Robert Rands