

27 May 2026

Submission to the Committee Secretariat for Education and Workforce Committee on the **Modern Slavery Bill**.

We greatly welcome the opportunity to submit on the **Modern Slavery Bill**, as the Bill seeks to establish a statutory framework to strengthen and co-ordinate actions to fight and advocate against modern slavery, including required annual reporting, creating a public register, improving public awareness, and strengthening victim support.

We align this submission to our earlier submission of 12 February 2025 on the **Crimes (Increased Penalties for Slavery Offences) Amendment Bill**. In our Crimes submission, we strongly supported increased penalties for slavery offences and argued that slavery in all forms is a grave violation of the dignity of the human person, the common good, and the absolute violation of the rights of those experiencing destitution and vulnerability. We also called for punitive measures to be introduced alongside proactive prevention, public awareness, and greater victim-centred support.

We, therefore, strongly support the Modern Slavery Bill as a natural and necessary next step in developing anti-slavery legislation. The Crimes Amendment Bill addressed the need for stronger penalties for perpetrators. We believe the Modern Slavery Bill addresses the wider systemic conditions that allow modern slavery to exist and remain hidden, especially in business operations and supply chains. We expect this Bill to strengthen mechanisms for slavery prevention, accountability, transparency, and continued support for survivors.

Clarity and Continuity

‘...ensure [...] legislation truly respects the dignity of the human person in the areas of migration, employment, adoption, the movement of businesses offshore and the sale of items produced by slave labour. There is a need for just laws which are centred on the human person, uphold fundamental rights and restore those rights when they have been violated.’¹

In our Crimes submission, we stated that slavery is “an affront to the God-given dignity of the human person and a serious moral injustice” and affirmed that society has a duty to

¹ Pope Francis. (2015, January 1). *XLVIII World Day of Peace 2015 - No longer slaves, but brothers and sisters* | Francis. https://www.vatican.va/content/francesco/en/messages/peace/documents/papa-francesco_20141208_messaggio-xlviij-giornata-mondiale-pace-2015.html

protect those most vulnerable to exploitation. We also emphasised that stronger penalties should be accompanied by practical measures that raise awareness, support victims, and prevent any likelihood of further exploitation.

The Modern Slavery Bill gives practical expression to these concerns. It does so by requiring entities to report on risks and incidents of modern slavery in their operations and supply chains: the action they have taken to assess, prevent, address, mitigate and remediate those risks, whether by complaints received, training provided or the effectiveness of their response. It also requires publication of these statements both on an entity's website and on a central public register.

For these reasons, our support for this Bill is not new or separate from our previous position. Rather, it is a continuation of the same moral, theological and social vision: that Aotearoa New Zealand must combat modern slavery not only by punishing it after the fact, but by exposing the systems that enable it, reducing the risk of its occurrence, and strengthening support for those experiencing harm.

Catholic Social Teaching

*'Such laws should also provide for the rehabilitation of victims, ensure their personal safety, and include effective means of enforcement which leave no room for corruption or impunity.'*²²

Our support for this Bill is grounded in the same Catholic Social Teaching (CST) principles that underpinned our previous submission.

Human dignity

We continue to advocate that every person possesses inherent dignity and that slavery reduces human beings to objects of control and exploitation. The Modern Slavery Bill affirms that economic life and supply-chain practice must not be separated from moral obligation. By requiring entities to identify and report on incidents and risks of modern slavery, the Bill helps ensure that persons are not hidden behind commercial arrangements or global distance.

Solidarity and the Common Good

Solidarity requires a collective commitment to the wellbeing of all, especially those who are experiencing destitution, marginalisation, and vulnerability. The current Bill reflects this logic by recognising that exploitation in supply chains is not only a private business risk but a matter of public concern. Its public register, annual ministerial reporting, and

²²*Ibid.*

provision for regular policy review reinforce the idea that society has a major role in confronting modern slavery.

Preferential option for those destitute and vulnerable

We continue to highlight that slavery disproportionately affects vulnerable people, including migrants and those with limited choices or protection. The Modern Slavery Bill is consistent with this CST principle because it seeks to reduce the risk of exploitation and explicitly requires support for victims through annual government reporting, guidance for agencies, and periodic review of whether current arrangements are adequate.

Rights and responsibilities

Our social teaching recognises both rights and responsibilities. Last year we emphasised society's responsibility to protect the freedom and dignity of those at risk of slavery. This Bill translates that responsibility into an institutional form by placing reporting obligations on entities above the revenue threshold, requiring statements to be signed and published, and creating consequences for failure to comply.

Moving beyond punishment to prevention

We envisioned in last year's Crimes Amendment Bill the increased consequences for slavery offences. This Bill complements that approach by attempting to reduce the risk of modern slavery occurring in the first place, including through reporting, due-diligence-related processes, transparency, and public accountability. The purpose clause expressly states that the Act is intended to reduce the risk of modern slavery by requiring reporting entities to report on actions to identify, prevent, mitigate, and remediate incidents within their operations and supply chains.

Recognising slavery that can be hidden in supply chains

The Bill requires reporting entities to describe their structure, operations, and supply chains, along with any incidents, known or anticipated risks, actions taken, complaints received, training provided, and how effectiveness is assessed. This is important in reducing exploitation obscured by layers of contracting or offshore sourcing. Public reporting creates visibility, and visibility is a necessary first step toward accountability and reform.

Enforcement

The Bill does not rely on voluntary goodwill alone. It creates offences for failing to prepare, submit, or publish required statements, includes liability provisions for directors and others involved in management, and provides for pecuniary penalties. It also provides for

publication of convictions and penalty orders and prevents Crown payments to entities that have contravened the legislation.

Greater Victim Support

We particularly welcome those parts of the Bill requiring annual ministerial reporting on referrals, investigations, prosecutions, certified victims, and support granted to those victims, as well as guidance about referral pathways and available services. These provisions align with the emphasis in our earlier submission on restorative justice, victim-centred care and services, and the beginnings of rebuilding lives with dignity and security.

Recommendations to strengthen the Bill

While we strongly support the direction and intent of the Modern Slavery Bill, we encourage the Committee to strengthen the Bill in several key areas to fully realise the Bill's potential and align with the principles outlined in our 2025 submission on slavery offences.

1. Maintain and strengthen a victim-centred approach

In our February 2025 submission, we emphasised that any effective response to modern slavery must include robust support for victims, including legal, psychological, and social assistance, as well as pathways for restoration and reintegration.

We therefore strongly support the Bill's provisions requiring:

- Annual ministerial reporting on victims and support provided
- Guidance for agencies on responding to modern slavery
- Periodic review of the adequacy of support systems

We recommend the Committee ensure these provisions:

- Remain explicit, practical, and measurable
- Include clear referral pathways and access to services
- Are subject to regular, transparent evaluation

A just response ensures that those freed from exploitation are supported to live with dignity, security, and hope.

2. Ensure reporting leads to meaningful action (not only compliance)

We strongly support mandatory reporting, but we emphasise that reporting alone is not enough. The Bill should make clear that disclosure is a means to accountability, not an end in itself. Decisive, concrete and meaningful action includes, but is not limited to:

- Risks and incidents of modern slavery
- Actions taken to prevent and address those risks

- Complaints, remediation, and training
- Assessment of effectiveness

The Bill's definition of due diligence already points toward an ongoing, systematic process of identifying, preventing, mitigating, and eliminating harm.

We encourage the Committee to ensure that:

- Reporting requirements drive real behavioural and structural change, not merely formal compliance
- There is a clear expectation that entities act on identified risks and incidents
- Transparency is linked to accountability and continuous improvement

Transparency is essential, but it must lead to genuine transformation of business practices.

3. Strengthen long-term oversight and leadership

We welcome the Bill's provision for:

- Regular review of the Act and related policy settings
- Consideration of establishing an independent Anti-Slavery Commissioner or similar body

We recommend that the Committee:

- Treat independent oversight as a key mechanism for accountability
- Ensure that review processes are regular, independent, and public facing

Effective and enduring change requires leadership, coordination, and ongoing scrutiny.

4. Recognise the Bill as complementary to criminal justice reform

In our Crimes submission, we strongly supported increased penalties for slavery offences as an essential means of deterring and adequately penalising exploitation. We emphasise that the Modern Slavery Bill should be understood as complementary to, not a substitute for, **criminal law enforcement**. Together, these approaches form a coherent and integrated response:

- Criminal law that punishes perpetrators
- Modern Slavery Bill as legislation that exposes and prevents harm, increases transparency, and strengthens accountability
- Victim support measures that continue to restore dignity and enable recovery

We encourage the Committee to ensure that this complementary relationship is clearly maintained in the implementation of the legislation and avoids any suggestion that reporting obligations alone are an adequate response to slavery.

5. Continue to develop a comprehensive, whole system response

Our earlier submission also emphasised the need for proactive measures, including raising awareness, early intervention, and exploitation prevention. We urge the Committee to recognise that modern slavery is **systemic, adaptive, and deeply embedded**, and therefore cannot be addressed by reporting requirements alone.

Subsequently, we further recommend this Bill be seen as part of an ongoing, evolving framework toward:

- Stronger public awareness and education
- Early intervention and prevention
- Engagement with civil society, faith communities, affected communities and institutions
- Continuous improvement of legal, social, spiritual, health, wellbeing, and regulatory responses.³

Modern slavery is complex and systemic. A piecemeal response will not be enough. It requires a response that is co-ordinated, sustained, morally and ethically grounded.

Nota Bene

We note that the Bill does not explicitly address emerging risks associated with modern forms of work, including those linked to artificial intelligence (AI) and digital supply chains. These include labour involved in data labelling, content moderation, and the production of digital systems, which may be hidden from public view but are nonetheless vulnerable to exploitation. We recommend that guidance issued under the Bill explicitly recognise these evolving forms of labour and ensure that reporting entities consider risks of modern slavery across both physical and digital supply chains.

More perspectives on *‘Breaking the chains of new forms of slavery’* and combating contemporary forms of servitude directly linked to the digital economy can be found in

³ King, P., Blaiklock, A., Stringer, C., Amaranathan, J., & Mclean, M. (2017, October 06). *Slavery in New Zealand: What is the role of the health sector?* New Zealand Medical Journal, Vol. 130 (No 1463), 1463. <https://nzmj.org.nz/media/pages/journal/vol-130-no-1463/slavery-in-new-zealand-what-is-the-role-of-the-health-sector/a6ea6d40da-1696477316/slavery-in-new-zealand-what-is-the-role-of-the-health-sector.pdf>

Pope Leo XIV's new encyclical ***Magnifica Humanitas: On Safeguarding the Human Person in the time of Artificial Intelligence*** in sections 173 – 182.⁴

In Principle

We also note that, while the Bill is not explicitly framed in terms of Te Tiriti o Waitangi, it aligns with key Tiriti principles, particularly the Crown's obligation to actively protect those who are vulnerable to harm. As we have expressed throughout our submission, modern slavery represents a profound and endemic violation of human dignity and wellbeing, and measures to prevent exploitation and support victims are consistent with this protective role. At the same time, we encourage the Committee to consider how the Bill could more explicitly reflect Tiriti principles, including through greater recognition of partnership and participation, and ensuring that Māori Tangata Whenua perspectives are included in all ongoing oversight, review, and implementation.

Conclusion:

*We ought to recognize that we are facing a global phenomenon which exceeds the competence of any one community or country. In order to eliminate it, we need a mobilization comparable in size to that of the phenomenon itself. For this reason I urgently appeal to all men and women of good will, and all those near or far, including the highest levels of civil institutions, who witness the scourge of contemporary slavery, not to become accomplices to this evil, not to turn away from the sufferings of our brothers and sisters, our fellow human beings, who are deprived of their freedom and dignity.*⁵

We, as a small island nation, have an opportunity to lead the global fight against modern slavery. We can be catalysts for absolute slavery abolition. Moreover, this Modern Slavery Bill is already making history as the first of its kind to advance under Standing Order 288 in our country, highlighting a rare and unprecedented unity across Parliament in responding to what is fundamentally a grave moral and ethical injustice.

We say loudly: keep moving with the momentum, expand the definition of what equates to modern slavery, then harness and enhance this singular cross-party agreement and move with the urgency and agency necessary to abolish slavery in all its forms, first from our own shores, then the world.

⁴ Pope Leo XIV. (2026, May 15). *Encyclical Letter of His Holiness Leo XIV Magnifica Humanitas (15 May 2026)*. The Holy See. Vatican.va. https://www.vatican.va/content/leo-xiv/en/encyclicals/documents/20260515-magnifica-humanitas.html#_chains_of_new_forms_of_slavery

⁵ Francis, *XLVIII World Day of Peace 2015*