

THE NEW AUSTRALIAN MODERN SLAVERY REGISTER

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Australia Corporate Alert

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As a world first and in a milestone step, on 27 November 2020, the Australian government's publicly accessible Online Register for Modern Slavery Statements uploaded the first tranche of statements under the *Modern Slavery Act 2018* (Cth). To access the Register on the Australian Border Force website, click [here](#).

Although the Online Register for Modern Slavery Statements was officially launched on 30 July 2020, the first of the modern slavery statements had not been uploaded until now.

There are currently 121 modern slavery statements that have been submitted and are able to be searched. Out of those uploaded, there are 102 mandatory statements and 19 voluntary statements from single or joint entities.

These initial reporting entities operate in a wide range of industries, including mining, air transportation, food retail, textiles and apparel and healthcare equipment.

The register will provide Australian consumers, investors and civil society with unique insight into global supply chains.

EXTENDED DEADLINES FOR MODERN SLAVERY STATEMENT SUBMISSION

Whilst the Modern Slavery Act ordinarily requires modern slavery statements to be submitted by reporting entities within six months following the close of the relevant reporting year, we are reminding clients and readers that deadlines have, for some reporting periods, been extended by three months in light of COVID-19. As we reported on 6 May 2020 in our [update](#), the new deadlines are summarised below:

Reporting period	Original deadline	New, extended deadline
1 April 2019 – 31 March 2020 (Foreign Financial Year)	30 September 2020	31 December 2020
1 July 2019 – 30 June 2020 (Australian Financial Year)	31 December 2020	31 March 2021
Reporting periods ending after 30 June 2020	The six month deadline for reporting periods ending after 30 June 2020 remains unchanged	

ONGOING COVID-19 CONSIDERATIONS

As earlier reported (in our [update](#) on 6 May 2020), the Australian government has continued providing comprehensive guidance and resources to assist reporting entities to address their modern slavery risks, including those risks associated with vulnerable workers resulting from the COVID-19 pandemic.

Companies are expected to continue to take steps to assess and address modern slavery risks during the pandemic and to report on those actions in their modern slavery statements.

Specifically, companies continue to be actively encouraged to maintain relationships and open communication with suppliers about COVID-19 risks; to collaborate with various stakeholders and peers to identify best-practice approaches to support vulnerable workers in global operations and supply chains; and to review and consider implementing guidance from international resources identified in the government's [Information Sheet](#).

The Australian government does however recognise, that some companies may be unable to provide detailed responses to certain criteria because of the pandemic. In that case, reporting entities are being instead encouraged to explain how COVID-19 has impacted their ability to assess or address modern slavery risks or delayed certain key actions, such as in-person training, planned audits or supplier engagement activities.

WHAT CAN K&L GATES DO TO HELP?

K&L Gates is currently assisting clients as they undertake their modern slavery review. Whether you have already started and are looking for some additional support, or if you have possibly not yet started, our team would be happy to talk with you. Ways we can help include:

1. Identifying the entities (if any) within your supply chain required to report under the legislation.
2. For reporting entities, assembling a project team, identifying and briefing key stakeholders, mapping structures, operations and supply chains.
3. Assisting in analysis of the risks of modern slavery.
4. Delivering stakeholder education.
5. Reviewing existing codes, procedures, policies, contracts (for modern slavery).
6. Assisting in drafting or reviewing a Modern Slavery Statement.

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