

Consultation and Remediation in Australian Modern Slavery Statements: A Longitudinal Analysis, 2020–2023

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Introduction

Modern slavery affects an estimated 50 million people globally (Walk Free, 2023).

Australia's **Modern Slavery Act 2018** introduced mandatory reporting for large entities, requiring annual statements describing actions taken to assess and address modern slavery risks. Two areas are particularly relevant:

Consultation: Organisations must report how they consulted entities they own or control.

Remediation: Organisations must describe actions taken to address modern slavery risks and associated harm. This includes remediation (Australian Government, n.d).

The **2023 Statutory Review** identified weaknesses in Australia's reporting framework and highlighted the need for stronger compliance, clearer reporting requirements and improved organisational responses (McMillan, 2023).

Using annotated Australian Modern Slavery Statements registered between 2020–2023 (Bora et al, 2025a), this study examines:

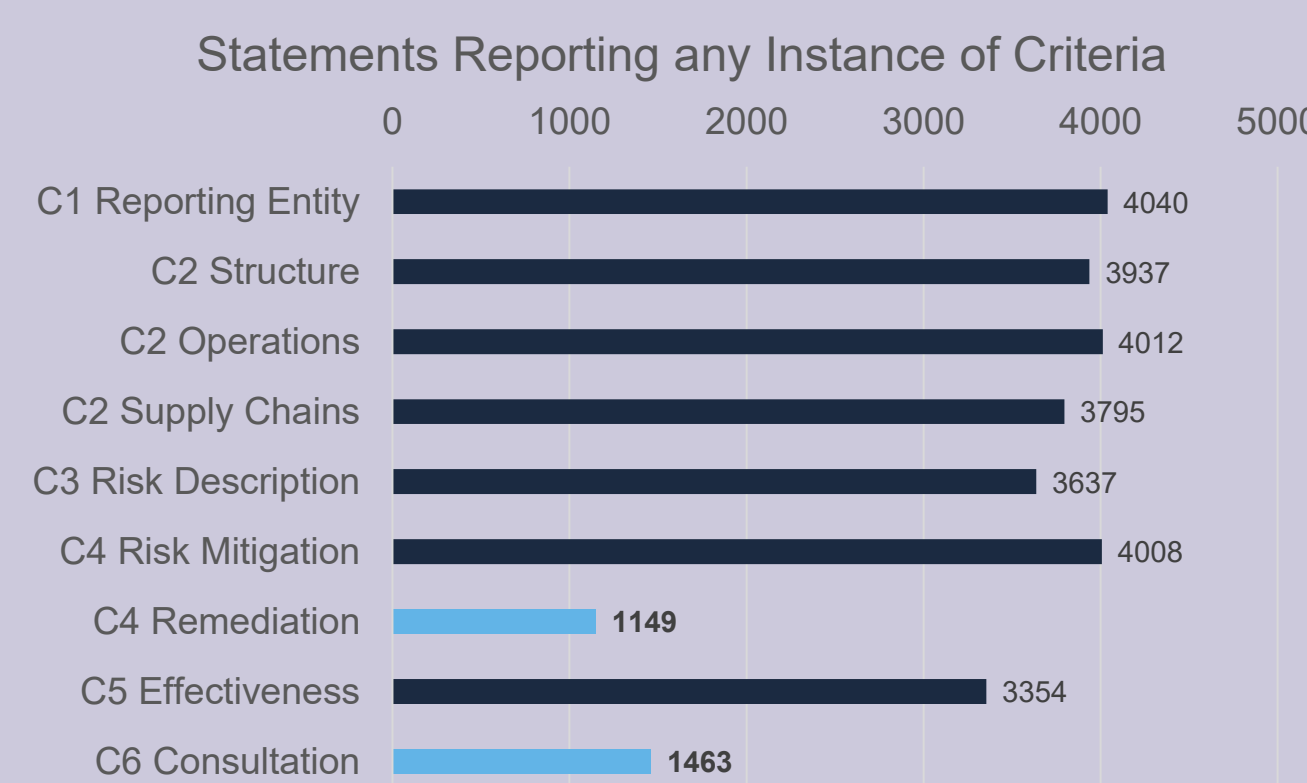
- How consultation and remediation reporting changed over time;
- Which statement characteristics were associated with reporting;
- Whether observed changes occurred within individual organisations;
- The extent to which the findings corroborate the **2023 Statutory Review**.

Methodology

The sample used 4061 unique statements from the period 2020–2023



Aggregate instances of criteria fulfilment were made at the statement level
Binary outcomes derived per criteria: $C_n > 0 \Rightarrow C_n = 1$



Pooled Logistic Regression

Why: To identify factors associated with whether an individual statement contained consultation or remediation coverage.
How: Two binomial logistic regression models were fitted, one per outcome.

Generalised Estimating Equation

Why: To directly test whether consultation and remediation changed differently over time.
How: Both outcomes stacked into a single dataset, each statement contributing one observation for each outcome domain.

Organisation Fixed-Effects Logistic Regression

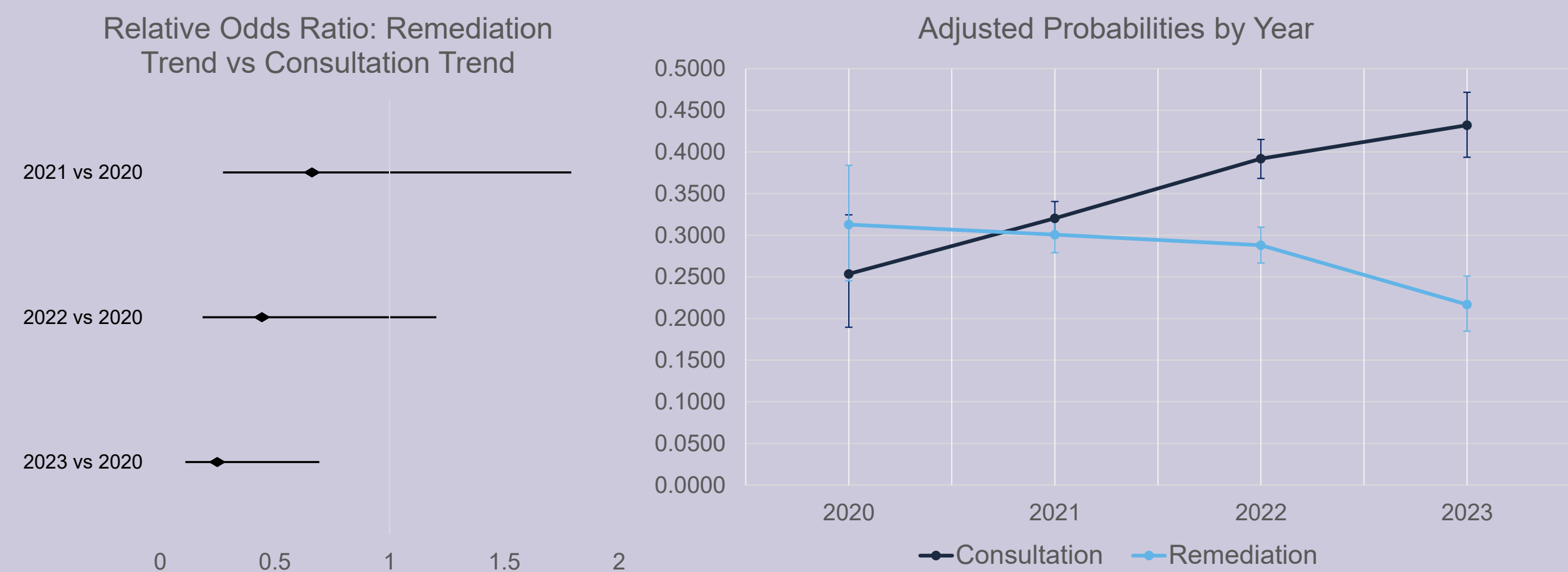
Why: To determine whether patterns were also evident within the same organisations over time.
How: Organisations in ≥ 2 register years matched: Valid ABN then Exact entity-group text – **1,001 longitudinal organisations**. An organisation fixed-effects logistic regression then estimated changes across years while accounting for stable organisation-specific characteristics.

Sensitivity & Robustness

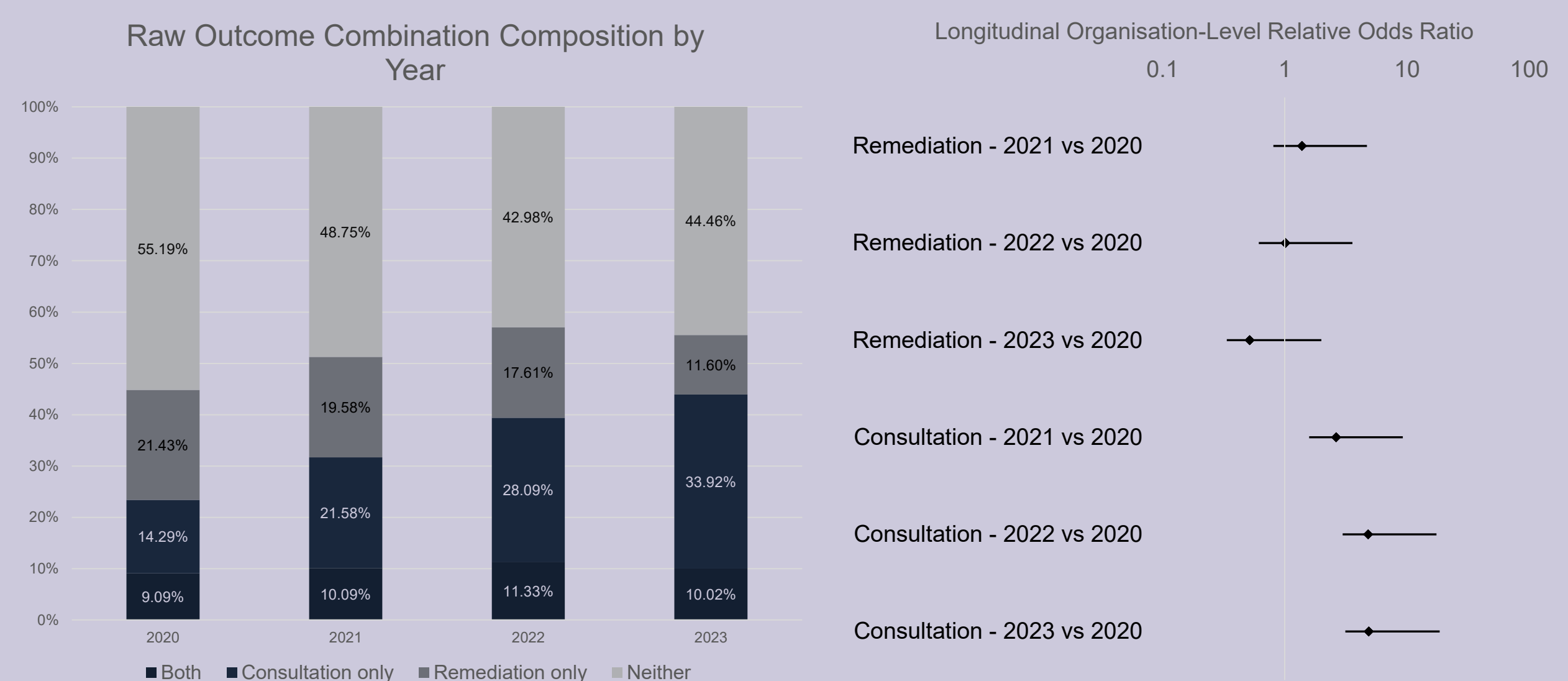
Why: To assess whether conclusions were sensitive to multiple testing, organisation matching and sample definition.
How: Industry comparisons → Benjamini–Hochberg FDR correction
Organisation matching → Restricted to checksum-valid ABNs
2022–2023 paired analysis → Organisations observed in both years
Paired outcome changes → McNemar tests

Results

- Consultation increased in pooled statements 23.4% → 43.9% (2020–2023), while remediation decreased 30.5% → 21.6% (2020–2023)
- Relative to consultation, the odds of remediation were increasingly lower over time (Outcome × Year interaction: Wald $p = 1.279e-10$)



- The **increase** in **consultation** was reflected at the **statement level**, although the **weight** of this was **less certain**
- The point estimate for **remediation** reporting falls, however this is **statistically imprecise**



Discussion

Consultation had a union (IAA) 0.94 and Cohen's Kappa (CK) 0.86, making it the most **reliably labelled** criteria in the entire dataset. **Remediation** instances on the other hand had an IAA 0.93, but CK 0.77, resulting in the **largest IAA – CK gap in the entire dataset** (Bora et al., 2025b).

44% of companies reported difficulty in deciding information which constituted **consultation**, while only 10% reported difficulty in including **remediation**.

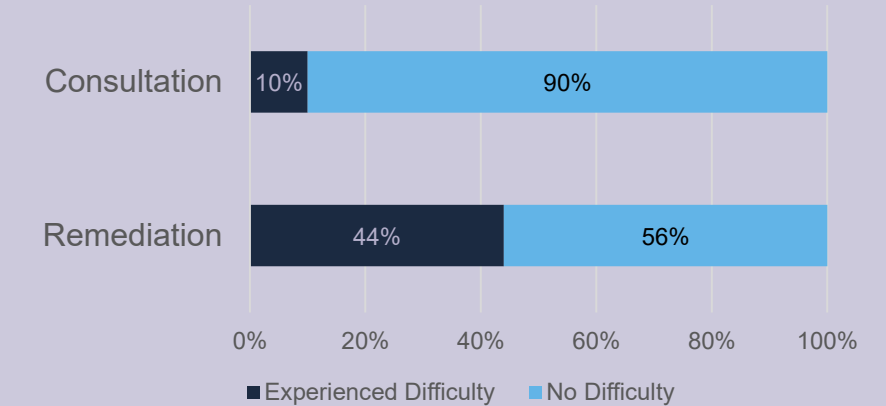
Failure adequately to describe **consultation** constituted over 55% of cases of **non-compliance** (McMillan, 2023).

The **increase** in **consultation** may be a result of its **singular mandate**, meaning unlike remediation, it has a **specific definition** which companies are **compelled to meet** lest they fail compliance.

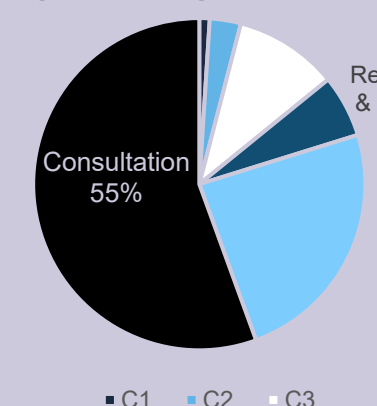
Although both remediation and consultation are essential in understanding and preventing modern slavery, the disparity in handling between them under current Australian law leads to different temporal trajectories.

Ongoing reform discussions in response to the review include an **extension of reporting criteria**, **civil penalties** and **criminal offences** for a failure to comply.

Difficulty Posed in Deciding Information to Include



Proportion of criteria inadequate reporting causing non-compliance



Future Research

- Analyse the **content and quality** of positively identified consultation and remediation statements.
- Extend the analysis beyond 2023 to assess **longer-term trends and the effects of legislative reform**.
- Evaluate whether increased consultation translates into **more substantive remediation activity**.
- Reproduce with **other disclosure-based legal frameworks**, such as the UK's Modern Slavery Act 2015.
- Reproduce following implementation of **updated legislation**, including any **new mandatory criteria** identified.



References