

130 Little Collins Street
Melbourne Victoria
Australia, 3000
Telephone: +61-3-9251 5271
Facsimile: +61-3-9251 5241
jim@victas.uca.org.au

Tom Reid
Division Head
Law Design Practice
The Treasury
Langton Crescent
Parkes, ACT 2600

E-mail: taxlawdesign@treasury.gov.au

Submission by the Justice and International Mission Unit, Synod of Victoria and Tasmania, Uniting Church in Australia and Harris Wake to the Inquiry into the Information Sharing – Protecting Vulnerable Visa Holders January 2016

The Justice and International Mission Unit of the Synod of Victoria and Tasmania, Uniting Church in Australia, and Harris Wake welcome this opportunity to make a submission on the *Taxation Administration Amendment (Disclosure of Information) Regulation 2016*. We support the regulation which will allow taxation officers to disclose protected information to taskforce officers in Taskforce Cadena. The Unit supports the government's efforts to reduce visa fraud, illegal work and exploitation of migrant workers in Australia.

Our only concerns are that Taskforce Cadena does not undertake activities to punish vulnerable people on temporary work visas that may have been coerced, physically or psychologically, or deceived into illegal activity. For example, people who have been trafficked into Australia or subjected to forced labour and were coerced or deceived into accepting cash-in-hand payments (illegally below the required wage level) from which no income tax deductions have been made should not be prosecuted for tax evasion. Protection of Australia's revenue base would be better served by prosecuting those involved in the human trafficking or forced labour arrangements and coerced or deceived the employees on temporary work visas. In our experience people in low skill or semi-skilled work on temporary work visas have limited ability to challenge illegal arrangements imposed on them by their employer and hold the very genuine fear that if they fail to comply with their employer's demands the employer will be able to orchestrate their removal from Australia.

Dr Mark Zirnsak
Director
Justice and International Mission Unit
Phone: +61-3-9251 5265
E-mail: mark.zirnsak@victas.uca.org.au

Cathrine Burnett-Wake
Director & Principal Migration Agent
Harris Wake Pty Ltd
Phone +61 3 9036 0000
E-mail: cbw@harriswake.com