Employment Rights Legal Service

6 June 2025

Modern Slavery Committee
Parliament of New South Wales
6 Macquarie Street
Sydney NSW 2000

Dear Modern Slavery Committee,

**Inquiry into modern slavery risks faced by temporary migrant workers in rural and regional New South Wales — Supplementary questions**

The Employment Rights Legal Service thanks the Modern Slavery Committee and the Parliament of New South Wales for the opportunity to provide further responses to the supplementary questions from committee members.

**1. What specific legal changes would you recommend to NSW Legislation e.g. the Residential Tenancies Act 2010?**

We recommend that subsection 9(1) of the *Residential Tenancies Act 2010* (NSW) (**RTA**) be amended as follows:

> *An agreement or arrangement under which a person is given the right to occupy premises for the purpose of a residence:*
>
> > *by a person who is also the person's employer, or an associated entity of the employer; or*
> >
> > *in return for, or as part of remuneration for, carrying out work in connection with the premises or the person's employment,*
> >
> > *is taken to be a residential tenancy agreement.*

Such a change will ensure that employees who are provided accommodation by their employer, or whose accommodation relies heavily on their ongoing employment, will have rights under the RTA (for example, in relation to notice periods or applicable grounds for eviction).

The current section 9(1) of the RTA does not provide protection for employees who pay for their accommodation, including by way of deductions; it only covers employees who are provided accommodation in exchange for their work or as part of their remuneration (i.e. they do not pay rent). However, employees who are both required to live in specific accommodation by their employer and to pay rent currently have no explicit tenancy rights under the RTA. It might be the case that an employee is 'paying' for their rent by way of a deduction, however

without a pay slip demonstrating the deduction/payment, such an employee's status under the RTA is unclear and contestable.

The provision of safe, affordable housing is a critical issue for temporary migrant workers, particularly those in regional and rural New South Wales (**NSW**) who routinely depend on their employers for accommodation. In our experience, migrant workers are often subjected to unlawful deductions or requirements to spend in exchange for (often subpar) accommodation.

It is also our experience that employer often charge greater than market rates for accommodation provided to employees. We recommend that the NSW Government considers a way to regulate and limit the cost of rent that can permissibly be charged to an employee to live in accommodation provided by an employer. Some Modern Awards provide such maximum amounts, however, most do not contain such provisions.

ERLS also recommends changes to the *Victim Rights and Support Act 2013 (NSW)* (**VRSA**), which provides eligible victims of modern slavery with support, including counselling, financial assistance for economic loss and recognition payments. However, the provisions of the VRSA do not appear to have been drafted with victims of modern slavery in mind. As a result, there are significant barriers to workers who fit this definition accessing the support.

One clear example of this is the evidence requirements for people claiming financial assistance for actual loss of earnings as a result of a crime. Under section 39 of the VRSA, claims for actual loss of earnings must be accompanied by "the name and address of the employer, the period of absence from work and a statement from the employer substantiating those particulars".[1]

ERLS has advised clients who have been seriously exploited and injured during their employment. It is entirely inappropriate and unsafe to require people in these circumstances to contact their former employer for a statement of this kind. We note this issue has also arisen for other clients of our services. For example, victims of domestic violence should not be required to seek statements of evidence from their employer where the perpetrator of the violence is also an employee or owner/director of the business.

Another example is that the categories of recognition payment under the VRSA do not reflect the experiences of many victims of modern slavery.[2] While each category explicitly applies to acts of modern slavery, the categories are defined with respect to various acts of violence and do not capture the kinds of acts that

[1] *Victim Rights and Support Act 2013* (NSW) s 39(4)(b).
[2] Ibid, s 35.

typically constitute modern slavery and cause serious psychological harm. As a result, many victims of serious acts of modern slavery are either ineligible for any recognition payment, or only eligible for a category D payment that does not reflect the level of seriousness of the relevant acts.

ERLS recommends that the VRSA be amended to:

- allow victims of crime to submit alternative evidence of actual loss of earnings. In our view, this should be an amendment that applies to all victims of crime, but at minimum is should apply where there is a link between the employer and the perpetrator of the crime (such as all victims of crimes relating to modern slavery); and
- better reflect the experiences of victims of modern slavery in the categories of recognition payment, allowing them genuine access to support under the scheme.

## 2. Structural risks embedded in visa and employment settings

**a. You describe modern slavery risks as systemic, particularly under PALM and working holiday visas. Can you walk the Committee through how these schemes structurally enable exploitation – particularly through employer control and tied accommodation?**

We refer to Pages 6 to 9 of our submission. In our experience, it is typical for temporary migrant workers to rely on their employers for accommodation, transport, food and other day-to-day necessities, due to language barriers, uncertainties over Australian practices and opportunities, no access to community and the remoteness of rural and regional NSW. Clients report to ERLS that it is often easier to put these necessities in the hands of their employer, creating that overdependence that can result in exploitation.

**b. Do you believe the use of employer-sponsored or geographically fixed visas breaches Australia's obligations under international labour or human rights law?**

ERLS does not advise on visa and immigration issues; however, we have observed that the current visa system, including employer sponsored and geographically fixed visas, disincentivises migrant workers from reporting abuse. This allows living and working conditions that breach Australia's human rights obligations to remain unaddressed.

While Australia has not ratified the *International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families*, migrant workers are protected by the *Universal Declaration of Human Rights* (**UNDHR**)*, International Covenant on Economic, Social and Cultural Rights* and the *International Covenant on Civil and Political Rights*.

Migrant workers are at particular risk of violations of the prohibition on slavery or servitude in Article 4 of the UNDHR. During his recent visit to Australia, the Special Rapporteur on Contemporary Forms of Slavery identified migrant workers as a particularly vulnerable population for modern slavery, and identified workers under the Pacific Australia Labour Mobility (**PALM**) scheme, Domestic Worker (Diplomatic or Consular) stream, Temporary Skill Shortage Visas, Working Holiday Visas, and Student Visas as of particular concern.[3]

As the special rapporteur reported, "the main issue among these schemes is that they create a significant power imbalance between employers and workers, since employees are either tied to a single employer, and mobility is reported to be extremely difficult, and/or dependent on their employer for extension of contracts or nomination for permanent residency".[4] This reflects the observations ERLS has made in our practice.

For the same reasons, Australia's visa system also leaves migrant workers vulnerable to breaches of the ILO Forced Labour Convention, (C29).

**c. Is there a case for de-linking visa conditions from employers altogether? What might a safer alternative migration framework look like?**

Unfortunately, this is outside our expertise and so, we are unable to comment.

[3] United Nations Special Rapporteur on contemporary forms of slavery, including its causes and consequences, End of Mission Visit to Australia, 27 November 2024, https://www.ohchr.org/sites/default/files/documents/issues/slavery/sr/statements/2024-11-27-eomaustralia-sr-slavery-en.pdf, 5.

[4] Ibid, 6.

## 3. Labour hire: Frontline weaknesses

**a. You point to labour hire firms as a common vector for underpayment, unsafe work, and debt bondage. In your experience, are labour hire operators in rural NSW operating in a legal grey zone, or are laws simply not enforced?**

We refer to Pages 5 to 8 of our submission. From our experience, there are multiple legal and practical issues that arise from labour hire employment contexts. Many of these arise from the separation of the employing entity from the workplace.

Our service has advised clients who work on labour hire contracts in fruit picking in regional NSW. It is common for the fruit pickers to be employed by one or more entities, and for the supervisors/farm workers to be employed by other entities. If, for example, a fruit picker is sexually harassed by the supervisor on one of the farms they work on, it can be very difficult to identify the correct entity who should be the subject of a sexual harassment complaint. We have seen responses to discrimination complaints which deny responsibility on the basis that the primary employer was not in control of the workplace conditions. While we do not consider this sufficient from a legal perspective, it makes engaging in a constructive conciliation process very difficult.

There are also significant legal gaps in protection from dismissal for workers who are employed on labour hire contracts. In our client cohort, it is very common that the primary employer will cease providing the worker with shifts or formally dismiss them when they are removed from an assignment with the client company. This often occurs without the primary employer conducting a proper assessment of whether the termination of the assignment was fair or compliant with discrimination laws.

In one example, a low paid administrative worker employed through a labour hire arrangement was dismissed from her placement just hours after notifying the host company of her pregnancy. There were no other reasons given for the end of the placement. The worker, who was on a temporary work visa, notified her employer of the discriminatory conduct. Her employer took no steps to address the actions of the host company and did not find the worker any alternative work, causing the worker immense stress and financial hardship.

**b. Have you seen cases where the primary employer uses labour hire as a legal buffer to avoid accountability for conditions on the ground?**

Please refer to our answer for Question 3(a).

**c. Would you support a public register of labour hire firms engaged in regulated sectors (e.g. agriculture), including breach history and licensure status?**

We refer to Recommendation 7 in our submission. We would support appropriate measures that create a transparent and effective licensing system for labour hire firms. We note that the current SafeWork Licence Register publishes information including:

- cancellations or suspensions of a licence;
- licence conditions;
- penalty notices and prosecutions involving the licence holder; and
- any other information the regulator thinks appropriate for inclusion.

We think it would be appropriate for a licensing scheme for labour hire firms to include similar information.

We note that there has been movement toward a national labour hire licensing framework, following on from the recommendations of the Report of the Migrant Workers' Taskforce in 2019.[5] We recommend that any steps the NSW Government takes toward regulating labour hire firms is implemented in a way that provides national consistency.

## 4. Legal remedies: The Access Gap

**a. You give a compelling case study about "Donna," who worked six days a week and didn't even know an Award applied to her. How typical is this scenario — and what does it reveal about systemic failures in education and enforcement?**

This scenario is quite common and is not confined to temporary migrant workers, or even workers based in rural and regional NSW. ERLS

[5] Commonwealth of Australia. (2019, March). Report of the Migrant Workers' Task Force < https://www.dewr.gov.au/download/14482/report-migrant-workers-taskforce/29660/report-migrant-workers-taskforce/pdf>.

advises many workers who are unaware of their legal and industrial entitlements, including whether they are covered under an Award.

Workers may generally be aware of a 'minimum wage'; they may have received a Fair Work Information Statement at the time of commencing employment; they may even have received and signed a contract of employment. However, in our experience, this does not translate to a clear or meaningful understanding of their workplace rights and entitlements, which we see persist through a worker's period of service. The longer it persists, the greater the consequence on the worker and the greater the difficulty in them pursuing claims they may have in relation to their employment. This is even further exacerbated in rural and remote areas of NSW, where access to assistance or resources is limited. As a result, community legal education is key in order to improve understanding amongst temporary migrant workers, as well as outcomes in terms of enforcement.

**b. Do current workplace dispute channels — like the Fair Work Ombudsman — work for rural migrant workers in practice? Or are they functionally inaccessible due to language, remoteness, or fear?**

Our experience is that there are significant challenges for rural migrant workers in accessing and effectively utilising current dispute channels, and accordingly, we want to acknowledge the strength and resilience of migrant workers who navigate Australian systems on a daily basis.

Legal language is technical and complex – workplace laws are difficult to navigate for non-lawyers who are not migrants. Migrants, who often do not speak English as a first language, face difficulties both understanding their rights and exercising them.

If migrant workers have been put in a position – financially or otherwise – where they are in breach of their visa conditions, they may feel unable to assert workplace rights for fear of being reported to the Department of Home Affairs. We note the existence of such measures such as the Assurance Protocol (which is currently paused), the Strengthening Reporting Protections Pilot and Workplace Justice Visa Pilot programs. However, accessing these protections still requires a certain level of understanding how where to get help and/or legal literacy due to complex eligibility criteria.

In rural areas, it may be more important to maintain connections and networks for employment prospects such that asserting rights could have implications not only for a migrant worker's relationship with their current employer but with the broader community, making it difficult for them to find employment after a workplace dispute.

c. **What's your view on the Workplace Justice Visa Pilot? Is it reaching rural NSW, and is it usable for real clients facing modern slavery conditions?**

The Workplace Justice Visa Pilot is reaching rural NSW.

Of the ERLS partners, Redfern Legal Centre is the only Accredited Third Party (**ATP**) and is the only non-Union ATP in NSW. As such, all NSW-based migrant workers who are not union members seeking certification must do so through Redfern Legal Centre. Several other community legal centres across Australia have applied to become ATPs and are still waiting for a determination, including ERLS partners Inner City Legal Centre and Kingsford Legal Centre. This needs to be immediately rectified by the Department of Home Affairs.

While the Pilot is successful, there are several limitations to the extent of its reach and success, primarily as a result of a lack of funding and resourcing to undertake this work. For the majority of the Pilot period, only one lawyer at Redfern Legal Centre (**RLC**) has been responsible for this work. With greater funding, ERLS would be able to actively advertise the Pilot and encourage migrant workers to make use of the Pilot. Currently, RLC is struggling to deal with the demand imposed by the Pilot, without doing proactive work seeking further clients. As such, the success of the Pilot is incumbent on the Federal Government expanding the list of ATPs as soon as possible, as per Recommendation 12 of our submission.

Since the commencement of the Pilot, RLC has received multiple referrals for certification from both the Office of the NSW Anti-slavery Commissioner, and Anti-Slavery Australia. RLC has provided multiple certificates on the basis that the client was subjected to modern slavery conditions in their employment – while 'modern slavery' is not itself a permissible workplace exploitation claim under the Pilot, the myriad causes of action which amount to modern slavery are.

## 5. Patterns of abuse and enforcement blind spots

**a. Do you see patterns in geography or industry that the Committee should be aware of — i.e., regions or sectors where breaches are concentrated?**

There are distinct geographic and industry patterns in migrant exploitation across NSW. Industries that have been identified as high risk of modern slavery include agriculture, horticulture and meat processing. In particular, the exploitation of workers under the PALM scheme is well documented with a prevalence of PALM workers in the Riverina region of NSW.[6] The concentration of breaches in these regions are commonly tied to restrictive visa settings as the conditional nature of PALM workers' visa makes them particularly vulnerable.[2] As a result, PALM workers facing exploitation have limited pathways to alternative employment which discourages workers from reporting issues such as bullying, harassment and wage theft.

ERLS also finds in regional areas, it is common for hospitality venues to hire migrant workers on working visas as it is difficult to retain talent. These workers are in a very vulnerable position as their housing arrangements will often be linked to their employment, and they have a limited support network. We often assist workers in this industry after they have been dismissed from their employment and in urgent need of legal assistance and other types of support. Additionally, it is common for underpayment issues to be identified at this stage after reviewing the client's payslips; however, workers in this demographic will rarely identify underpayment issues themselves.

**b. You mention excessive deductions and substandard housing. Are these typically linked to contracts, verbal arrangements, or coercive control? Can they be regulated directly by NSW housing law?**

We refer to Pages 6 to 9 of our submission. In our experience, it is typical for temporary migrant workers to rely on their employers for accommodation, transport, food and other day-to-day necessities, due to language barriers, uncertainties over Australian practices and opportunities, no access to community, and the remoteness of rural and regional NSW. Clients report to ERLS that it is often easier to put these

[6] Immigration Advice and Rights Centre and Unions NSW, *Preventing Migrant Worker Exploitation in Australia* (Report, November 2024), 5-6.

necessities in the hands of their employer, creating that overdependence that can result in exploitation.

In terms of regulation, please refer to our answer to Question 1.

c. **What role do major supermarkets or supply chain buyers play in enabling or preventing these abuses? Are you aware of cases where corporate purchasing power could have prevented harm?**

We do not have specific experience of engaging with end clients such as supermarkets unless they are the primary employer or involved directly with the employment.

However, major supermarkets and supply chain buyers play a crucial role in both enabling and preventing migrant exploitation. Major supermarkets can enable exploitation by driving down costs and demanding low prices from suppliers to remain competitive.[7] This places pressure on suppliers to cut labour costs, which often results in wage theft, unsafe working conditions and exploitative labour practices.

There is a systemic abuse of foreign labour and exploitation of migrant workers by being underpaid to pick and package fresh produce that ends up being sold by Australia's big supermarkets. Corporate purchasing power can play a crucial role in preventing migrant worker exploitation by demanding ethical sourcing practices and working collaboratively with suppliers to identify and address exploitative practices.

## 6. Role of the NSW Government

a. **Given that most workplace regulation is federal, what are three tangible actions you believe the NSW Government can take now to reduce harm for temporary migrant workers?**

We refer to Recommendations 3, 7 and 12 of our submission.

b. **You suggest expanding culturally appropriate legal services. What would that look like on the ground — mobile clinics, embedded services in migrant communities, regional hubs?**

Given the unique cultural and linguistic needs of temporary migrant workers, ERLS requires additional funding to provide increased advice

[7] Office of the Anti-Slavery Commissioner, Parliament of New South Wales, *Be Our Guests: Addressing urgent modern slavery risks for temporary migrant workers in rural and regional New South Wales* (Report, September 2024), 11-12.

and representation to temporary migrant workers in rural and regional NSW. With greater funding, culturally appropriate legal services on the ground would look like:

- targeted campaigns providing direct, accessible and in-language resources, and education to temporary migrant workers about workplace rights and exploitation;
- workshops for allied professionals who support migrant workers in regional and rural NSW to identify legal issues, understand the risks, increase knowledge on areas of law and facilitate referrals for legal help;
- mobile legal clinics travel to regional and rural NSW, including farms, accommodation sites and community centres, to bring critical legal support directly to migrant workers, especially those isolated by geography and language;
- regular "Know Your Rights" sessions conducted in-person in multiple languages with live translation;
- launching digital services, including developing legal education materials in different languages, providing tele-legal services with interpreters, and using platforms that are commonly used by these workers; and
- outreach trips in collaboration with local service providers and other stakeholders.

**c. What accountability should the NSW Government bear for allowing an enforcement vacuum to persist in rural regions?**

ERLS acknowledges that the enforcement and monitoring of workplace laws in rural and regional areas is a distinct challenge to overcome. The NSW Government can increase its accountability for migrant exploitation in rural regions by strengthening reporting and support mechanisms and fostering a greater strategic coordination between federal and State authorities to monitor sectors that exhibit higher modern slavery risks.[8] Recommendations 7 and 12 provide ways the NSW Government can ensure migrant workers can enforce breaches of their workplace rights and entitlements to their fullest extent.

[8] Ibid, 23.

## 7. Policy and legislative options

**a. Would you support a state-based labour rights ombudsman or commissioner role, distinct from the Fair Work Ombudsman, focused specifically on temporary migrant workers?**

We would support a NSW-based labour rights ombudsman or commissioner with a focus on temporary migrant workers, distinct from the Fair Work Ombudsman. Particularly given that depending on the specific claim involved, migrant workers can approach state and federal courts for relief. However, this would ultimately depend on the role's authority and powers associated with it, as well as the clarity and distinction defined between this role and the Fair Work Ombudsman.

Our clients often report confusion between state and federal industrial systems, and which is the relevant organisation for them to approach. For example, it is very common for employees of the NSW Government to approach the Fair Work Ombudsman for assistance with workplace issues, and vice versa. As such, clearly defining what abilities and responsibilities are in the remit of a state-based labour rights ombudsman or commissioner would be helpful in ensuring the role is most effective.

**b. What state-level legislative or regulatory reforms would close the current loopholes that allow debt bondage and coercive housing to persist?**

Please refer to our answer to Question 1.

**c. Should NSW establish a standalone compensation scheme for exploited workers who cannot access the Fair Entitlements Guarantee due to visa status?**

Yes, temporary migrant workers should receive the same entitlement as permanent residents and citizens to claim unpaid wages, leave and entitlements from a former employer following a bankruptcy, liquidation or other insolvency event.

## 8. Looking forward

**a. From a legal practitioner's perspective, what does a trauma-informed, justice-based approach look like for a PALM worker in Coffs Harbour or Griffith?**

A trauma-informed, justice-based approach for a PALM worker in regions like Coffs Harbour or Griffith, would focus on understanding the psychological, emotional and physical effects of trauma that these workers have experienced.

Legal services and frontline workers should foster an environment where workers can feel safe, heard and understood. The key in migrant workers accessing justice is being able to communicate and feeling safe to do so. This means interpreting services needs to be better funded and interpreters should be trauma informed.[9] With greater funding, legal services such as ERLS can provide culturally sensitive training for legal practitioners to recognise and respond to trauma to deliver an effective legal service, without causing further harm to the worker. In addition, legal services must embody trauma-informed principles across all aspects of service design, organisational culture, leadership and management.

**b. If the Inquiry were to recommend a 12-month pilot reform initiative in a high-risk region, what would you prioritise — enforcement, outreach, legal education, or policy change?**

As our submission and other submissions have highlighted, there is no single issue which when addressed could remediate the current state of modern slavery in Australia. In ERLS' experience, these issues are all inevitably and incontrovertibly entwined. For example, outreach may be beneficial in terms of providing direct access to advice and assistance for temporary migrant workers, but without legal education, the outreach itself may not be effective or may not result in any particular outcome. Instead, a holistic response is required.

[9] See Recommendation 5 of our submission.

**9. Legal rights and access to justice**

**a. In your experience, are workers in regional areas even aware of what minimum wages, hours, and entitlements apply? How much of the system depends on workers self-identifying breaches?**

Please refer to the answer to Questions 4(a) and (b).

**b. Do you believe the current legal system assumes a level of literacy and confidence that temporary migrant workers in rural NSW simply do not have?**

Please refer to the answer to Questions 4(a) and (b).

**10. Labour hire and supply chain structure**

**a. You've suggested that labour hire companies create distance between the real employer and the exploited worker. Is there a case for holding end clients — supermarkets, processors — jointly accountable for violations in their supply chains?**

We consider that all businesses have obligations to ensure that human rights are respected throughout their supply chains, in Australia and internationally. We support local and global movement towards holding end users accountable for breaches of human rights in their supply chains.

We note that the NSW Anti-slavery Commissioner has published resources for the management of modern slavery risks for public entities which may provide a blueprint for large corporate entities as well.

**b. Have you seen examples of repeat labour hire operators with known records of exploitation continuing to operate unimpeded?**

Please refer to the answer to Question 3(a).

**11. Visa conditions and dependency**

**a. What reforms to visa settings would best reduce the fear your clients have of employer retaliation or visa cancellation?**

While we are unable to provide specific recommendations on possible reforms to visa settings, we note our clients' fear of employer retaliation or visa cancellation generally stems from a perception that raising concerns or making complaints may result in adverse effects on their stay or safety in Australia.

Unscrupulous employers can either exaggerate or misrepresent these effects to temporary migrant workers in order to disincentivise temporary migrant workers from raising concerns or making complaints. As such, allowing temporary migrant workers to safely extract themselves from employment and providing education on what action or conduct from employers is permissible would be key to reducing fear amongst this cohort of workers.

**b. Do you support sectoral or regional-based mobility under existing schemes like PALM as an interim solution?**

Unfortunately, this is outside our expertise and so, we are unable to comment.

## 12. Workplace justice visa and legal reform

**a. From your casework, is the Workplace Justice Visa pilot known to and usable by those in regional communities?**

Please refer to the answer to Question 4(c).

**b. What design elements would you change — eligibility, length, employer cooperation — to make this program actually protective?**

The Pilot is already protective, however in its capacity as an ATP, Redfern Legal Centre has been consistently engaged with and making recommendations to the Department of Home Affairs to ensure the Pilot achieves its purpose. Aside from increasing the number of ATPs across the country, and requesting funding to undertake the extensive work required, we have also recommended that:

- ATPs be permitted to make assessments for the purpose of the Pilot by reference to verbal instructions (as opposed to a statutory declaration), as well as other forms of evidence where available.
- Eligibility for the Strengthening Reporting Protections Pilot be extended to workers whose visas are at risk of cancellation in circumstances where their employer has made unlawful deductions or unreasonable required them to spend an amount (capturing situations where migrant workers are forced to pay fees associated with their visa – which is currently unlawful under the *Migration Act 1985* (Cth) and is not a breach for which a worker can access the Strengthening Reporting Protections Pilot).

- The formal visa application process be amended to enable workers whose passports have been confiscated (as they often are in modern slavery situations) to efficiently and effectively progress their application, for example by providing a statutory declaration that their passport has been confiscated.

## 13. Enforcement and regulatory gaps

**a. Are NSW regulators resourced or trained to investigate complex coercion or trafficking cases in regional areas — or are these often passed off as "federal issues"?**

Please refer to Recommendations 9, 10 and 11 of our submission.

**b. Would you support stronger powers for NSW agencies to initiate enforcement action even where federal regulators decline to act?**

Stronger enforcement powers for NSW agencies, even when federal regulators decline to act, could lead to more effective regulation and protection of migrant workers. Given the severe vulnerabilities of migrant and seasonal workers in regional and rural NSW, state-level enforcement powers can provide a crucial safety net and ensure that workers' rights are protected.

In our submission, we highlight the need for a more tailored and personal approach from regulatory bodies such as SafeWork NSW in terms of investigation and compliance, with an emphasis on cultural competency given the unique circumstances faced by temporary migrant workers. We refer to Recommendation 9 in particular, regarding an establishment of a Migrant Worker Taskforce or Unit in SafeWork NSW to exclusively handle incident notifications involving temporary migrant workers.

Please let us know if you have any questions about this submission. You can reach the Employment Rights Legal Service at .

Yours sincerely,

Yuvashri Harish
Coordinator
**EMPLOYMENT RIGHTS LEGAL SERVICE**