



**Uniting Church in Australia**  
SYNOD OF VICTORIA AND TASMANIA



## **Inquiry into the Working Holiday Maker program**

**Joint Submission to the Joint Standing Committee on Migration**

**The Uniting Church in Australia, Synod of Victoria and Tasmania and The Salvation Army Australia**

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## Statement of Recognition

The Salvation Army and the Uniting Church in Australia acknowledge the Traditional Custodians of the lands and waters throughout Australia. We pay our respect to Elders, past, present and emerging, acknowledging their continuing relationship to this land and the ongoing living cultures of Aboriginal and Torres Strait Islander peoples across Australia.

## Introduction

The Salvation Army and the Uniting Church in Australia, Synod of Victoria and Tasmania, welcome the opportunity to contribute to the Committee's Inquiry into the Working Holiday Maker program.

We would be happy to clarify or provide further information and would welcome further opportunities to consult with the Committee. This submission will address the following terms of reference:

1. The purpose of the program including history, size, composition, eligibility, and reciprocal access for Australians and recent changes;
5. The extent to which existing visa criteria and conditions related to Working Holiday Makers are still adequate and appropriate to address the purpose of this program, including cultural exchange and creating job opportunities for Australians;
6. The extent to which the program can support economic recovery in regional Australia.

## Recommendations

1. That the Commonwealth Government create an offence for advertising an illegally low rate of pay for employment, or conveying to a potential job applicant that a job will have an illegally low rate of pay.
2. That with the introduction of Director Identification Numbers, the underlying information about company directors, including place of residence and date of birth, are still publicly accessible to assist those seeking to recover stolen wages.
3. That the Commonwealth Government introduce a public register of beneficial owners of businesses, so that the owners of companies engaged in illegal exploitation of Working Holiday Makers can be held to account.
4. That the Commonwealth Government establish a public register of all employers of Working Holiday Makers, the purpose of which would be to provide assurance that employers on the register comply with tax laws and employment laws and also to assist Working Holiday Makers identify suitable employers.
5. The Commonwealth Government should proceed with its introduction of a National Labour Hire Registration Scheme. The Scheme should ensure the people running and controlling labour hire businesses are identifiable and are 'fit and proper' to run such a business. The Scheme should also make it an offence for a business to use a labour hire company that is not registered.

## Exploitation of Working Holiday Makers

This Inquiry's terms of reference speak to the importance of and, indeed, the reliance of segments of Australia's economy on the Working Holiday Maker Program (WHMP). The inquiry itself, which has been initiated as a result of the significant decrease in Working Holiday Makers (WHMs) resulting from the coronavirus, further speaks to this reliance.

As such, the first matter the Committee should consider is whether the program can continue to be regarded strictly as a 'cultural exchange' program. In many respects, it is indeed a labour program on which key industries and regional communities rely, and has been increasingly so with visa extensions for those who spend the specified periods of time working where there is a shortage of labour supply.

In its own inquiry into the WHMP in 2016, the Fair Work Ombudsman recognised tension between "the public policy intention of the 417 visa program as a 'cultural exchange' and the use of the visa program as a source of labour."<sup>1</sup> The increasing proportion of WHM visas (as well as student visas) within the migration system has been identified by the Grattan Institute as validation of its assertion that "Australia is now running a predominantly low-skill migration system"<sup>2</sup> through the WHMP.

These observations sit within a broader discussion about the extent to which temporary labour programs may suppress wages or drive unemployment and under-employment. To the extent that this is true, the authors submit that the reason for this is less about the quantity of visa holders and more about the impunity under which so many employers have been able to exploit and mistreat temporary workers. Thus, unethical employers are able to employ WHMs below the Award rate, thus excluding many Australian residents from the employment who are unwilling to work for illegally low rates of pay.

Despite the economy's reliance on WHMs, there has been little action to address longstanding problematic issues of the program. These were thoroughly documented by the FWO's 2016 inquiry<sup>3</sup>, which noted underpayment/non-payment of wages; coercion of visa holders to pay for assistance to gain a second year work rights visa; increased dependency on employers by WHMs to secure a second year visa; sexual harassment and workplace safety issues; and WHMs working for free in exchange for non-certified accommodation programs.

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<sup>1</sup> Fair Work Ombudsman. (2016). Inquiry into the wages and conditions of people working under the 417 Working Holiday Visa Program, <https://www.fairwork.gov.au/about-us/access-accountability-and-reporting/inquiry-reports#417-visa>.

<sup>2</sup> Daly, J. (2019). *Immigration and wage growth: Discussant paper Low Wage Growth, RBA Conference 2019*, p 10, <https://grattan.edu.au/wp-content/uploads/2019/07/RBA-wages-and-migrants-as-submitted-22-July.pdf>.

<sup>3</sup> Fair Work Ombudsman. (2016), p 4.

One university study<sup>4</sup> examining wage theft amongst international students and Working Holiday Makers observed that the risks and costs of pursuing a remedy were unwarranted for the majority of workers. Of the study's 4,322 respondents, 2,250 expressly acknowledged that they had been underpaid, of which 97 per cent did not seek any assistance to recoup wages. Of those Working Holiday Makers who were underpaid and sought assistance (4 per cent), 60 per cent recovered nothing and only 17 per cent recovered all of their unpaid wages.

The authors submit that the lack of transparency, due to the absence of a WHM Employer Register<sup>5</sup>, and lack of regulation of the program, where recruitment largely occurs via informal channels, exacerbate problems and make it difficult for employees to exercise their rights or to know which employers are more likely to be compliant with the law.<sup>6</sup> This has fostered an endemic culture of abuse, as observed by the FWO's inquiry that:

- unreasonable and unlawful requirements are being imposed on visa holders by unscrupulous businesses;
- exploitative workforce cultures / behaviours are occurring in isolated and remote workplaces; and
- employers are making unlawful deductions from visa holders' wages, or are unlawfully requiring employees to spend part or all of their wages in an unreasonable manner.<sup>7</sup>

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<sup>4</sup> Fassenblum, B. & Berg, L. (2018). *Wage theft in silence: Why migrant workers do not recover their unpaid wages In Australia*, <https://static1.squarespace.com/static/593f6d9fe4fcb5c458624206/t/5bd26f620d9297e70989b27a/1540517748798/Wage+theft+in+Silence+Report.pdf>.

<sup>5</sup> *Treasury Laws Amendment (Working Holiday Maker Employer Register) Bill 2017*, [https://www.aph.gov.au/Parliamentary\\_Business/Bills\\_Legislation/bd/bd1617a/17bd088#\\_Toc478637304](https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/bd/bd1617a/17bd088#_Toc478637304).

<sup>6</sup> Mullins, S. (2019, June 16). Sleep with me or I rape you. *ABC News*. <https://www.abc.net.au/news/2019-06-16/calls-to-regulate-backpacker-work-ahead-of-federal-visa-changes/11186178?nw=0>.

<sup>7</sup> Fair Work Ombudsman. (2016), p4.

### **Case Study – ‘Kylie’<sup>8</sup>**

**(\*names and some details have been changed for privacy purposes)**

I arrived in Australia at the end of January 2016, already with the intention to complete my 88 days of farm work to extend my visa for a second year. I decided to do the farm work as soon as possible as then this would give me the opportunity to travel and explore Australia later.

I spent one month searching the internet, ringing various people, trying to find farm work, with no luck. Either it was the wrong season, or there was no work available. Eventually, I came across an advert on Gumtree for zucchini picking in Young. I rang the number, and a man with a thick accent (not Australian) answered and explained how it would be difficult work, but he will sign for my visa if I work for at least six weeks. In retrospect, I was naive to jump on this opportunity so quickly, but after one month of searching for a job, I was ready for anything. Little did I know what I was getting myself into.

I packed up and left a few days later using my friend’s car to drive to Young, a four hour drive from Sydney. I was nervous and didn’t know what to expect. I arrived and instantly I felt odd. I met a man, sitting in a big shed. Immediately, it felt sketchy, however I was willing to give it a shot. I went around to our accommodation, which was somebody’s back yard where I set up my tent. The kitchen facilities were appalling. There was one pot for ten people, a couple of plates, and a few pieces of cutlery. The kitchen was infested with cockroaches and flies, as no one had removed the overflowing bin. The bathroom was a room with a shower as a dribble and no hot water, which luckily didn’t matter as it was 40 degree heat. But for washing dishes this was not hygienic, especially with the amount of insects. The loo was disgusting, no loo roll, paint peeling off the walls and not much of a flush! Anyway, I set up camp and spoke to a few people who had been there for three weeks, or a few days, which didn’t fill me with much hope.

The following day, I set out at 6:45 am, the employer showed me how to pick the zucchini’s. Each bucket I picked was \$2.00 each. All the zucchini’s were different sizes, and the employer insisted on a specific size, so picking one bucket took time! I picked six buckets in six hours work, which is a measly \$2.00 per hour. We rang the employer after we had picked all the correct size zucchini’s and asked him to move us to a different field. However, he said no, we had to stay on that same field and pick all the overgrown zucchini’s as they were taking all the water and nutrients. Essentially, we did this work for free as we were not putting the zucchini’s in the bucket. By 1 pm I had had enough.

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<sup>8</sup> ‘Kylie’ was a WHM who shared her story with the Uniting Church in Australia.



I felt disappointed and exploited. There was no way that I could make any money and also no way that I could respect the people employing me. On top of this, they did not give out payslips and it was cash in hand with no tax. This was dodgy!! Too dodgy to seem legitimate for the second year visa. I had been lied to.

After this, a couple of us ventured into Young, in hope to find an alternative job. We rang the harvest trail website and I spoke to a man called Jack\*, a contractor based in Mildura. He explained on the phone, that the job would be grape picking and packing, and that it was hard work, but he could sign my days for my visa and he gave out pay slips! Accommodation would be \$100 and work was available asap. I took the opportunity and left for Mildura the following morning.

From the situation I was in, I felt this was my only option. I drove seven hours to Mildura from Young and started grape picking the following day. Jack showed us exactly how he wanted the grapes picked and packed. I did this for a few days and received my first pay slip. \$147 for four days work. I was horrified, I had worked hard for 10 hours per day and this was my pay. This again, is about \$2.00 per hour. It was disgusting. Again, I felt exploited and lost all respect for the contractor. On top of the shocking pay, the accommodation was dismal. The fridges did not work properly, there was a tiny freezer for 20 people. There was no electricity in the bathrooms, or our bedroom. The toilets did not flush properly and there was no escaping the intense heat at night-time. This set up again, was very dodgy.

In addition, to the poor pay, and awful accommodation. Jack, the contractor, was charging us \$5 per day to get to work. He would pack 16 people into his minibus and would be making over \$100 a day for "petrol." My first pay check was \$147, so if you take off \$100 for accommodation, \$10 for internet, and \$30 for transport to work. I was left with \$7 for food. So ridiculous.

I felt disappointed with Australia, I was not expecting any of this, I felt totally exploited and was so angry with the contractors. I decided to leave Mildura and travelled with others to Hillston, for orange-picking work. After we arrived, we soon learned from some locals that, yet again, the contractor for the orange picking was dodgy. I felt disheartened, thoroughly fed up and messed around. We decided just to stay in Hillston for one week and see if we can get some other work on a different farm around there. I have never looked back.

The following morning we were given the opportunity to pick up sticks on a wheat and barley farm. We grabbed the opportunity, finally an hourly paid job!!! And legitimate payslips and signature for my second year visa. I have stayed in Hillston for over two months now, and I can honestly say that through everything I had been through this was the best and most honest set up that I had experienced.

The issues of exploitation were arguably already contributing to a decrease in the WHMP. From 1 July to 31 December 2019 compared with the same period in the previous year, there was a 9.3 per cent reduction in the number of WHMP visa grants and an 11.4 per cent decrease in second visa grants.<sup>9</sup> From 31 December 2018 to 31 December 2019, the WHMP had shrunk by 3 per cent.

The ease with which unscrupulous employers and operators can evade detection and continue to exploit WHMs and other low-skill workers not only acts to deter prospective employees—both migrant and Australian—from taking up work in industries like hospitality and horticulture. It also acts as a disincentive for those employers/operators benefiting from the system to hire workers who will expect to be paid the legally required wage, who are more inclined to raise grievances and who may not require hostel accommodation or links to employment through hostel operators.

If the government's wish is to ensure the WHMP 'complements' rather than 'competes' with Australian workers' interests, it must address these longstanding issues of exploitation and unlawful employer behaviour. As it stands, the current conditions on the WHMP are likely to deter Australian workers, particularly young workers who are already facing higher rates of under- and non-payment in the workforce. The Committee should examine this and also what other barriers currently exist for Australians to seek work in certain geographic areas and industries that commonly face labour shortages.

In the case of 'Kylie' above, when the Synod attempted to follow up her exploitation we found that her employer in Mildura had used a false name and we were unable to track him down. Kylie had no official documents from him that allowed a place of business to be identified.

Fortunately, the Parliament has passed legislation to modernise the Australia business registries. There is a need to ensure that in introducing a Director Identification Number access to the underlying information that allows directors to be identified is not lost, including place of residence and date of birth. The Commonwealth Government should also introduce a publicly accessible beneficial ownership register, so the real owners and controllers of companies can be identified and held to account when WHMs and others are illegally exploited.

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<sup>9</sup> Australian Government Department of Home Affairs. (2019, December 31). *Working Holiday Maker visa program report*. <https://www.homeaffairs.gov.au/research-and-stats/files/working-holiday-report-dec-19.pdf>.

## Working Hostels

Employers can currently gain a competitive advantage by underpaying WHMs and the well documented model of the working hostel sustains vulnerability of workers by binding them to particular operators to access and maintain work. We have raised concerns and examples of problems in past inquiries, which we respectfully submit to this inquiry for reconsideration.

Whilst there are some areas with legitimate labour shortages, the demand for seasonal labour is often occurring in areas of high local unemployment. In these scenarios, labour hire companies target temporary migrant workers because the business model generates higher profits, not just from low cash in hand, underpayment of wages, but when jobs are also tied to accommodation through the extraction of wages back in over-priced accommodation charges.

In the 'working hostels' model, companies deduct excessive housing costs for substandard housing, as documented in media reports dating back several years.<sup>10</sup> This is also demonstrated in Carl's payslip below, which he shared with The Salvation Army in an email detailing his story.

DESCRIPTION		HOURS	CALC. RATE	AMOUNT	YTD	TYPE
Base Piece Rate		137.32	\$1.00	\$137.32	\$137.32	Wages
Accommodation				(\$84.00)	(\$84.00)	Deductions

<sup>10</sup> Blair, O. (2019, December 5). Is it time for Australia to overhaul its farm work visa scheme for backpackers? *Cosmopolitan*.  
<https://www.cosmopolitan.com/uk/reports/a27490859/farm-work-australia/>

### **Case Study from Western Australia**

Carl was 24 when he came to Australia on a working holiday visa. Carl granted The Salvation Army permission to share his story, which he communicated to us in an email after identifying problems on a WA strawberry farm where he worked briefly before deciding to locate better work.

"I'm sending this email in reference to an article I've read about X strawberry farm in Y, WA. I also was informed that a news station aired a story about the farm treatment and underpayment of employees.<sup>11</sup> I was also informed that camera crews were here just days before 1 August (our first day on the farm).

I've only been here on the farm for one week, but can clearly see things are not right. At least three of my work days were already taken from me and I don't know why because I've started the first of the month and worked every day except Sunday. The accommodation is \$12 a day, but the rooms are freezing cold due to the placement of the rooms which is the next to the packing room. The rooms have bunk beds, but the beds are mats—not beds at all. Also, during the entire first week, if me or my friends had questions concerning the accommodation or just follow up questions about workers' pay rate, 'the bosses simply and nonchalantly told us that we 'should just find another place to work or live'. And at the moment we've felt stranded and hopeless because neither of us had vehicles to drive to new places for work or accommodation.

They also stated indirectly at X strawberry farm (because nothing was ever clear to us but to be up at 7:30 am daily to be ready to pick strawberries) that workers don't get paid until their third week of work. Which will mean that if my friends and I were to stay here we wouldn't be compensated until the third week and would still have to pay for accommodation while still buying groceries for us to survive. We couldn't possibly have enough money to do that.

Also during the first week of staying on the farm my friends and I tried to secure a ride to the nearest town to buy groceries and linen for the rooms, but were told different times about a shuttle bus that never came or we were told by one driver that we could be dropped off and would have to find our own way to the farm. To get to the town from the farm is like a 40-minute drive and to be told 'find your own way back' should be more proof they didn't care about our wellbeing.

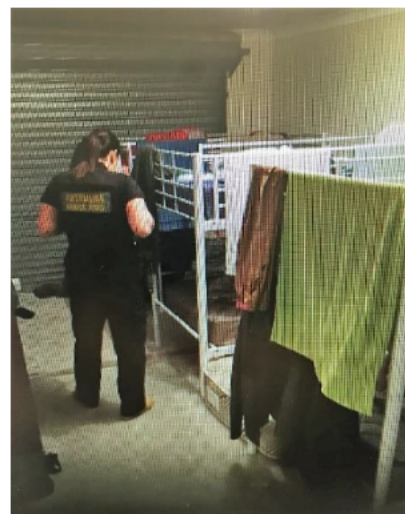
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<sup>11</sup> Day, L. (2016, August 1). Strawberry pickers claim they were paid as little as \$4 an hour in 'labour camp' conditions, *ABC 7:30 Report*. <http://www.abc.net.au/7.30/content/2016/s4511363.htm>.

Like I said I was only here for a week, but made friends with fellow backpackers and we thought this was a farm for options to do quality work and get paid; and in my friends' cases, work towards their second year visas while getting paid as well, but this farm has not shown us that this could be done here. We felt like we had no other option but to leave this farm and find proper work and accommodation somewhere else. They showed no interest in any of their employees' welfare, but only strawberries.

Not only does this business model generate financial benefits by hostel operators; it also enables those benefiting from exploited labour to avoid reputational damage by disconnecting their workforce from the social fabric of the town.

The photo shown here was taken during a Border Force raid in September 2016 on a property controlled by a labour hire company charging 10 workers \$100 per week each to live in a garage in Woolgoolga with a roller door as its main entrance. The case study below from Mildura demonstrates the issue of sub-standard, over-priced accommodation is not an anomaly.



### se Study – My Mildura Nightmare<sup>12</sup>

It was the contractor, Don, who picked us up. Before he even drove us to our backpacker accommodation, we had to sign a form saying that the money we pay the contractor was for a “job search” and not for rent. He drove us straight to a cash machine, where we had to withdraw \$900 to pay upfront. This was actually for two weeks rent each, plus a bond.

He then drove us straight to our accommodation which, to our surprise, was a house with about 30 people living there (4 bedrooms). After having a strict talk from the ‘head of house’ (who had been there for four weeks) about the rules of the house and respecting Don (otherwise he would kick us out without question or delay-which he has done many times before), we then got shown to our room...the garage, with 6 bunk beds in it and no heating. At this point I was feeling very uncomfortable, unwelcome and very homesick.

We got told to go and buy some food for the week and some clothes/shoes suitable for the job. This rinsed us of all of our money. We had nothing left.

We started work the next day at 7am, it was freezing and after a very cold night, we weren’t feeling ready at all. We turned up to a farm full of rows of dead vines, no fruit. We were vine pulling. We could only afford thin gloves and we spent the whole day until 6pm, pulling old vine branches off the wires. It was extremely hard work, time consuming, getting whipped all over our bodies and across our faces every two minutes from the vines. We had to count how many vine trees we had pulled by the time we got picked up and it got written down. We were then told we got paid about 15c a vine. In a full day we earned max of \$30 each a day. “Rent” was \$150 each a week. If we worked 7 days a week we’d earn max \$210 each, leaving us with \$60 a week for living essentials.

We got back to the house to share one kitchen with everyone and two showers (even though we were told we were only allowed to use one). Then to bed in the freezing garage, which was only accessible from outside, and back up at 6:30am with swollen and very sore hands. We found out after a couple of days, that the girl on the phone was just another worker, one of us, who had only been there for two weeks previous to us, who got paid \$20 per person she signed up, so obviously she sold the fruit picking job well.

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<sup>12</sup> Anonymous. (2015 January 26). My Mildura Nightmare. *Fruit-picking jobs*. <http://www.fruitpickingjobs.com.au/my-mildura-nightmare/>

## False Internships

The FWO inquiry found a number of businesses that “prior to the introduction of the paid work requirement, were signing off on the specified work requirement of the 417 visa program in exchange for ‘unpaid’ work.”<sup>13</sup> Whilst not identical to the described issue, The Salvation Army has identified that some employers may be falsely or deceptively recruiting WHMs on the basis of legitimate, paid internships, as illustrated in the case study below:

### Case Study

A client of The Salvation Army was enrolled in a Hotel Culinary course at a university in South Korea. Her professor/lecturer circulated an opportunity to students in the course to complete their final semester as an intern working with the X Hospitality group in Australia.

Our client was interviewed in Korea, and selected with a few other students. They were advised that the internship would be for three months in Sydney and would pay \$500 per fortnight. They were also advised that if they stayed on and worked for a full 12 months, the company would reimburse the costs of their travel to Sydney.

Our client entered Australia on a 417 visa. When she arrived, she discovered that there was no training or supervision involved at all at X Hospitality group. “Interns” were just expected to work for X Hospitality group at various locations across Sydney.

Our client discovered that she in fact would not be paid for her work during the “internship”, and that she would have to cover her own transport costs around Sydney. She was not paid at all for three months of work, working 45 hours per week, each day without a break. She was housed at a dormitory run by X Hospitality group with many other student workers to a room.

She had no employment contract.

The professor/lecturer visited the “interns” in Sydney. One of the students complained to the professor/lecturer about their working conditions and was verbally abused by him, being told that she had no choice but to do the unpaid work.

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<sup>13</sup> Fair Work Ombudsman. (2016), p 28.

## Transparency and Accountability for WHMP Employers

The government's decision to repeal the WHM employer register also shields those employers/operators doing the wrong thing by making it difficult, if not impossible, to confirm the legitimacy of job advertisements. The register would have provided WHMs with the reassurance that employers listed were paying their taxes in compliance with the law, which is likely to indicate they were compliant with employment laws and legal pay rates.

The government's own announcement<sup>14</sup> of WHMP reforms in 2016 stated that an employer register would "provide valuable data on who employs working holiday makers, what sectors they are engaged in and where the employers are located. The register will be made public so working holiday makers can check whether a prospective employer is registered."

## National labour hire registration

In the 2019-2020 budget the Commonwealth Government indicated that it would implement the recommendation of the Migrant Worker Taskforce for a National Labour Hire Registration Scheme.<sup>15</sup> The commitment is a welcome measure to address exploitation of WHMs and other vulnerable workers by unethical labour hire businesses. To be effective the Scheme needs to ensure people running labour hire businesses are 'fit and proper', that those found to exploit workers are held to account and that it is an offence for a business to use a labour hire business that is not registered. It is the authors' experience that the business contracting a labour hire business that is engaged in illegal activity is often aware of the illegal activity and have been willing to profit from it in the form of paying less for the labour it needs. The model shields the contracting business, because when law enforcement agencies pursue the labour hire business, that business will often phoenix and the contracting business escapes without penalty. There have been some noticeable exceptions in recent years, with the Fair Work Ombudsman pursuing the contracting business through the accessorial liability provisions of the *Fair Work Act*.

The anecdotal experience of the Uniting Church is that the Victorian Labour Hire Licensing Act 2018 has already been making a difference for WHMs. The congregation at Maroona in Victoria hold a barbeque for WHMs every Friday night during the harvest season. Prior to the Victorian Act being passed, WHMs stated their expectation was that they would be illegally exploited on farms. They would 'put up with it to do the 88 days' work to get the second year extension on their visa'.

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<sup>14</sup> Australian Government The Treasury. (2016, September 27). *Better working holiday maker tax arrangements* [Media release]. <https://ministers.treasury.gov.au/ministers/scott-morrison-2015/media-releases/better-working-holiday-maker-tax-arrangements>.

<sup>15</sup> Australian Government. (2019). *2019–20 Budget Jobs and Small Business Overview* [Budget Papers]. <https://www.employment.gov.au/budget-2019-20#portfolio-budget-statements-2019>



Their expectations were met. Most of the WHMs were on illegally low piece rates and only a few were on hourly rates. In the year following the implementation of the Act, most of the WHMs were on legal hourly rates or fair piece rates compliant with the Horticulture Award. The WHMs reported that they were now coming out to the farms to earn money to continue their travel around Australia.

## Conclusion

In conclusion, with the creation of visa extension arrangements to encourage WHMs to fill labour shortages, the WHMP is no longer just about bi-lateral cultural exchange; it has become a de facto labour program. As such, it requires greater monitoring to ensure that recruitment and employment conditions are to a legal standard and that employees have meaningful access to labour protections. We respectfully submit that it is not realistic to expect a WHM to bring wage claims to the FWO when they are reliant on the employer for sign-off and in such a short time frame. In such circumstances, the WHM has much more to lose and evidence cited earlier in this submission demonstrates the myriad barriers WHM face to accessing stolen wages.

Rising rates of unemployment due to the Covid-19 pandemic mean that many Australians will be in search of work. It is both sensible and appropriate to encourage Australians to take up work in sectors dominated by migrant labour to address unemployment and the loss of migrant labour. However, all workers have the right to be paid a legal wage for their labour. It is not realistic to expect Australians to flock to industries where widespread wage theft has been documented without first addressing those issues. We acknowledge the Government's efforts to date to address exploitation of WHMs and other migrant workers, including amendments under the *Fair Work Amendment (Protecting Vulnerable Workers) Act 2017*; however, we submit that more must be done to monitor conditions on the WHMP. This will be in the interest of all workers within Australia.

## About Us

### The Uniting Church in Australia, Synod of Victoria and Tasmania

The Synod of Victoria and Tasmania is part of the Uniting Church in Australia, the country's third largest Christian denomination. The Uniting Church in Australia was formed in 1977, when three congregations – the Methodist Church of Australasia, the Presbyterian Church of Australia and the Congregational Union of Australia – came together.

We are one of six Synods, comprising 600 congregations and more than 60,000 members. We also have 12 schools. We worship every week in more than 40 languages. Through worship, sharing the story of Jesus, and service in the community, we witness to the belief that life is most fully found in God.

Through UnitingCare, the Uniting Church in Australia is the largest non-government provider of community services in Australia, employing more than 70,000 Australians.

We have formal partnerships with 32 churches in Asia and the Pacific and have also been instrumental in pioneering interfaith relationships, including other Christian denominations.

We have a strong sense of social justice and actively campaign on a range of issues, including the environment, modern slavery, asylum seekers, fair work and gambling.

We have campaigned against modern slavery in seafood production and processing from Thailand, garment production in India, cotton production out of Uzbekistan, palm oil production from Malaysia and on Australian farms.

## The Salvation Army

The Salvation Army is an international Christian movement with a presence in 128 countries. Operating in Australia since 1880, The Salvation Army is one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion.

The Salvation Army Australia has a national operating budget of over \$700 million and provides more than 1,000 social programs and activities through networks of social support services, community centres and churches across the country. Programs include:

- Financial inclusion, including emergency relief.
- Homelessness services.
- Youth services.
- Family and domestic violence services.
- Alcohol, drugs and other addictions.
- Chaplaincy.
- Emergency and disaster response.
- Aged care.
- Employment services.
- Modern Slavery

As a mission driven organisation, The Salvation Army seeks to reduce social disadvantage and create a fair and harmonious society through holistic and person-centred approaches that reflect our mission to share the love of Jesus by:

- Caring for people.
- Creating faith pathways.
- Building healthy communities.
- Working for justice.

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

### **Further Information**

The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance. Further information can be sought from Major Paul Hateley, National Head of Government Relations, on [REDACTED] or at [government.relations@salvationarmy.org.au](mailto:government.relations@salvationarmy.org.au).