

**Palladium International Pty Ltd (PIPL) entered into the Head Contract with DFAT. The responses to the questions posed are from PIPL (Palladium).**

1. Please provide a full list of Palladium's responsibilities within the SWP through the PLF.

PLF does not have responsibility for the Seasonal Worker Programme (SWP). Up until January 2022 this sat with the Department of Education, Skills, and Employment (DESE), and now sits with DFAT.

Since October 2018 the PLF has provided targeted support to the SWP in a limited number of areas, these include (per DFAT agreement number 74040):

- LSU performance – strengthening partner Pacific government agency performance of immigration, recruitment, pre-departure briefing, skills, and health check functions in the Pacific labour market system.
- Skills development – facilitating skills development and APTC linkages (linking TVET graduates with Australian employers to support recruitment) and provision of add-on-skills training for workers in Australia.
- Research & analysis – undertaking research and evaluative studies of the Pacific labour market system to inform policy and program management decisions.
- Information management – using information management systems to inform Pacific labour market system actors & ensure DFAT & DESE have required data.

2. How much of the \$77,000,000 contract with DFAT for the PLF has been spent thus far on:

- a. Direct support to PLS and SWP workers – funding is not provided directly to workers through the PLF.
- b. \$7,000,000 of contract value is GST and of remaining \$70,000,000; \$49,210,809 has been expensed to date (as of 28 February 2022) on PLF End of Program Outcomes (EPOs) outlined below but this amount also includes other costs associated with implementing the PLF such as program management costs (communications, quality, learning & performance, operations), personnel, office costs, management fee etc.
- c. The following summarise activities covered by this funding that indirectly support workers involved in both PLS and SWP.

- i. **EPO 1: *An increase of appropriately skilled and diverse women and men are mobilised to work in Australia.*** This relates to a range of initiatives led by the PLF to not only increase the supply of Pacific seasonal and longer-term workers but also to improve the quality of the workers through a range of activities that will ensure workers are suitable and have access to relevant and appropriate skills development. Activities will be undertaken to target those previously under-represented within circular labour mobility (including women and people living with disability), with a particular emphasis on efforts to improve equity and inclusiveness. The outcome will be facilitated by brokering linkages between relevant Australian Pacific Technical Coalition (APTC) graduates and Australian employers. In addition, efforts will be undertaken to ensure partner governments are better informed regarding Australian employer requirements and expectations.

- ii. **EPO 2: *There is a sustainable and growing demand for Pacific workers (women and men) workers from Australian industry.*** This relates to efforts to increase the uptake of workers by Australian employers, which include activities to enhance awareness amongst employers who have unmet labour needs. Activities will also be undertaken to improve the facilitation of the placement of workers with employers, ensuring that only those employers who are deemed of high quality continue to employ Pacific workers. High quality ratings will include an emphasis on support services to workers whilst they are in Australia.

- iii. **EPO 3: *The PLS maximises benefits and minimises risk to Pacific workers (women and men) and Pacific and Australian communities.*** Develop a supportive and conducive environment for both the supply side

(workers) and the demand side (employers) to operate. For workers this includes support services as well as activities to promote financial literacy and financial planning, so that workers are better informed with respect to transferring savings and remittances, and effective reintegration of workers back into their communities on return home, including efforts to help workers become job creators through leveraging skills gained whilst in Australia. For Australian employers this includes as few additional transaction costs as possible relating to PLS.

- d. Palladium overheads and expenses – this information is commercial in confidence
- e. Palladium margin – this information is commercial in confidence
- f. Other (please advise) – n/a
- g. Remains unspent – As of 28 February 2022, \$20,789,191 remains unspent (excluding GST) with 15 months of contract implementation to complete.

3. The contract between DFAT and Palladium for the PLF says in Paragraph 4.1(d) on page 49:

“The contractor will identify and develop partnerships to support national dialogue on managing the risks of worker exploitation and enhancing compliance as well as support services to workers. The contractor will also communicate lessons from research and information from monitoring of the PLS and SWP.”

Please advise:

- a. What partnerships Palladium has developed to support a national dialogue on managing the risks of worker exploitation, and what the results of those partnerships have been. [See response to question 3 below.](#)
- b. How does Palladium monitor the SWP? [See response to question 3 below.](#)
- c. What data or other information has Palladium collected from the SWP? [See response to question 3 below.](#)
- d. What lessons have been learned from this information and who have they been communicated to? [See response to question 3 below.](#)

[Response to question 3:](#)

[Palladium through the PLF works closely with a range of research partners, including the Australian National University and the World Bank, on Pacific labour mobility research. Research information is regularly exchanged through coordination meetings, blogs, and policy briefings as well as through online seminars. To date, specific research on worker exploitation amongst research partners has been limited, given that these issues are best captured and addressed through program assurance mechanisms.](#)

[Palladium is not responsible for monitoring the SWP. However, it has previously collected monitoring \(survey/interview\) information from SWP workers on PLF-led activities that have benefited SWP workers. These have included church partnership and skills development activities.](#)

4. The contract between DFAT and Palladium for the PLF says in Paragraph 33.1 that:

[“The contractor will ensure the health, safety and welfare of workers under the PLS and SWP is a high priority for approved employers and for the PLF, particularly for those who may face specific vulnerabilities, including women and people with disability.”](#)

[This is incorrect – there is no mention of the SWP in the contract between DFAT and Palladium Paragraph 33.1. The correct clause says that:](#)

[“The contractor will ensure the health, safety and welfare of workers under the PLS ~~and SWP~~ is a high priority for approved employers and for the PLF, particularly for those who may face specific vulnerabilities, including women and people with disability.”](#)

Please advise in as much detail as possible how Palladium has ensured that worker welfare

is a high priority for approved employers, including how Palladium monitors and audits that this is the case on an ongoing basis.

In relation to the PLS, the PLF is responsible for delivering the following functions to ensure that worker welfare is a high priority for the approved employers (per DFAT agreement number 74040):

- **LSU performance** – strengthening partner Pacific government agency performance of immigration, recruitment, pre-departure briefing, skills and health check functions in the Pacific labour market system.
- **Employer support services** – facilitating timely entry of new employers, facilitating recruitment services, inducting, supporting and educating approved employers.
- **Worker support services** – support to approved employers on worker welfare issues, management of worker critical incidents, engagement with community organisations to support workers, provision of support service line.
- **Assurance** – provision of assurance and compliance functions relating to the Approved Employer Deed, as well as education and capacity development support
- **Stakeholder relationship** – monitoring & facilitating effective relationships among Pacific labour market system actors.
- **Communications and public affairs** – communications capabilities to generate written and multimedia content and the ability to implement communications strategy to promote and inform the Pacific labour market system
- **Information management** – using information management systems to inform Pacific labour market system actors & ensure DFAT have required data.

Specific to the PLS, the following provides more detail on PLF's role with assurance and compliance of Approved Employers.

PLF's role in assurance is distinctly separate from the role of the Fair Work Ombudsman and the Australian Border Force in investigating alleged breaches of the Fair Work and Migration Acts. Rather, the focus of the PLF is on building connections and maintaining positive relationships, reviewing employer obligations and compliance with the Deed of Agreement and Approved Employer (AE) Guidelines, and using those to function as an early warning system, including raising any issues that require further investigation by the Government agencies.

The PLF undertakes assurance activities against an annual plan approved by DFAT and ad hoc activities based on risk and emerging trends. The PLF escalates issues to DFAT for appropriate action and decisions where required.

5. In Senate Question on Notice number 1662, asked by Senator Wong on 23 June 2020, DFAT said that the PLF had taken 43 cases from SWP workers through its 24/7 help and advice hotline, and 73 total SWP cases through all channels. Please advise:

- a. Do you have updated numbers on these two points?

From June 2019 to March 2022, there have been:

- 390 welfare cases from SWP workers
- 226 through the welfare hotline
- 164 through other channels

- b. One of the other channels described is “regular welfare visits/calls”, another is “community outreach events.” Madec is one of, or perhaps the largest labour hire firm in the SWP. How many welfare visits or calls, or outreach attempts, have been made to Madec workers since the PLF was established? Please provide dates and locations for each.

PLF does not have responsibility for the Seasonal Worker Programme (SWP), refer to DFAT for any questions about the SWP.

- c. In total across all employers, how many “regular welfare visits” has Madec conducted in the SWP since the PLF was established, and how many workers were spoken to?

PLF does not have responsibility for the Seasonal Worker Programme (SWP), refer to DFAT for any questions about the SWP.

Specific to the PLS, the following provides more detail on PLF's role in supporting the welfare outcomes of workers:

The PLF worked in collaboration with a large number of labour mobility stakeholders in 2021 to determine and establish the Community of Care approach to support the welfare outcomes of PLS workers.

Approved Employers play a central role in meeting the general support needs of workers; however, it is recognised that divestment needs to occur in combination with enhanced worker self-agency, and explicit involvement of local communities, and participating countries in order for support to be most effective.

Since 2021 the PLF has facilitated a regional engagement process involving Approved Employers and other key stakeholders. This place-based approach, in the form of the Regional Accelerator Forums (RAF), brings together key stakeholders and establishes stakeholder roles and responsibilities, identifies stakeholder capacity building opportunities, embeds operational protocols including procedures for escalation of worker concerns and set general communication and interaction practices between AEs, participating countries, community and other key stakeholders.

See Annex 1 for an overview of the Community of Care model. See Annex 2 for an overview of the escalation process.

6. According to the SWP Approved Employer Guidelines on page 11 at Section 1.5:

“DFAT, through the PLF, delivers the Add-On Skills training component of the SWP which allows Seasonal Workers to access basic training including in first aid, English and IT skills.”

Notes for clarification:

- Palladium does not provide training directly to workers, rather they manage the administration related to worker training.
- PLS and SWP Approved Employers are eligible for funding support to train their workers using registered training providers
- The Add-On Skills training component has been redesigned and is now referred to as the Skills Development Program
- More details about the Skills Development Program can be found here - <https://www.palmscheme.gov.au/skills-development#:~:text=The%20Pacific%20Australia%20Labour%20Mobility,they%20are%20working%20in%20Australia.>
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Please advise:

- a. How many SWP workers has Palladium provided with basic training in first aid since the PLF was established?  
Since October 2018 = 1051
- b. How many SWP workers has Palladium provided with basic training in English since the PLF was established?  
Since October 2018 = 180
- c. How many SWP workers has Palladium provided with basic training in IT skills since the PLF was established?  
Since October 2018 = 41

- d. What proportion of SWP workers has Palladium provided with basic training in first aid since the PLF was established?  
Palladium does not have the data to provide a response to this question. PLF does not have responsibility for the Seasonal Worker Programme (SWP), refer to DFAT for any questions about the SWP.
- e. What proportion of SWP workers has Palladium provided with basic training in English since the PLF was established?  
Palladium does not have the data to provide a response to this question. PLF does not have responsibility for the Seasonal Worker Programme (SWP), refer to DFAT for any questions about the SWP.
- f. What proportion of SWP workers has Palladium provided with basic training in IT skills since the PLF was established?  
Palladium does not have the data to provide a response to this question. PLF does not have responsibility for the Seasonal Worker Programme (SWP), refer to DFAT for any questions about the SWP.

Additional information:

A total of 1474 SWP workers have received training since the PLF was established. Includes other types of training – examples outlined below.

A total of 1605 PALM scheme workers (PLS & SWP) have received training since the PLF was established. Includes other types of training – examples outlined below.

A total of 35 SWP Approved Employers have accessed funding via the PLF to train workers since October 2018

A total of 14 PLS Approved Employers have accessed funding via the PLF to train workers since October 2018

Other types of training requested by Approved Employers that has been funded for SWP and PLS workers:

- Forklift licenses
- Working safely with chemicals
- Food safety supervision
- Pole & chainsaw operation
- Applied occupational health & safety
- Testing of electrical cords
- Tag, trim and cutting fell trees
- Safe driving / Australian driving license tests





# FIRST RESPONSE ESCALATION PROCESS

This document outlines the roles and responsibilities for all stakeholders involved in supporting the community of care for workers on the Pacific Australia Labour Mobility (PALM) scheme. It is essential that all stakeholders follow the process below when responding to issues and incidents to ensure they are dealt with effectively and in a timely manner.

**IN AN  
EMERGENCY  
CALL 000**

<b>LOW RISK</b> <b>LEVEL 1 – GENERAL ISSUES</b> Timeframes: 5 working days to act Level 1 includes minor issues resolved without the PLF or other party consultation or assistance.		<b>MEDIUM RISK</b> <b>LEVEL 2 – REPORTABLE ISSUES</b> Timeframes: 24 hours to act and notify Level 2 includes significant issues requiring PLF oversight. Consultation with CLO, LSU, FWO and Home Affairs may be required.		<b>HIGH RISK</b> <b>LEVEL 3 – CRITICAL INCIDENTS</b> Timeframes: must act and notify immediately (as soon as practicably possible). Urgent and serious issues. PLF intervention and additional oversight from PLF CLO, LSU and HOM partners may be required.	
<b>Examples of Level 1 issues:</b> <ul style="list-style-type: none"> <li>• minor employer issues</li> <li>• payslips</li> <li>• minor conflict with a supervisor</li> <li>• money transfer queries</li> <li>• visa queries</li> <li>• health insurance queries</li> <li>• general welfare issues</li> <li>• minor medical concerns</li> <li>• minor issues with accommodation</li> <li>• minor conflict at accommodation sites.</li> </ul>		<b>Examples of Level 2 issues:</b> <ul style="list-style-type: none"> <li>• unresolved level 1 issues</li> <li>• end of employment</li> <li>• repatriations</li> <li>• absconding</li> <li>• worker hospitalised</li> <li>• workplace dispute or serious allegation</li> <li>• worker exiting the PLS</li> <li>• visa non-compliance</li> <li>• police and/or emergency services involvement</li> <li>• workplace injury resulting in time off work or a work cover claim</li> <li>• medical issue resulting in prolonged period off work</li> <li>• worker redeployment or relocation</li> <li>• 30 hours per week not met</li> <li>• HR process pending. (performance, conduct).</li> </ul>		<b>Examples of Level 3 issues:</b> <ul style="list-style-type: none"> <li>• unresolved level 2 issues</li> <li>• death of worker</li> <li>• critical injury or illness of a worker</li> <li>• worker arrested and or involved in a criminal offence (victim or perpetrator)</li> <li>• worker admitted to hospital in life threatening condition</li> <li>• domestic violence incident involving a worker, either as a victim or perpetrator.</li> <li>• major deed non-compliance event.</li> </ul>	
APPROVED EMPLOYER	ALL OTHER STAKEHOLDERS	APPROVED EMPLOYER	ALL OTHER STAKEHOLDERS	APPROVED EMPLOYER	ALL OTHER STAKEHOLDERS
1. AE to analyse the issue. 2. AE to find a remedy. 3. AE to ensure resolution has taken place.	1. Contact the AE during business hours. 2. If unresolved, escalate via level 2.	1. AE addresses and resolves matter with workers. 2. AE to inform and seek support from LO/LSU of matter if unresolved. 3. AE to engage with PLF/other stakeholders as per DEED requirements. 4. AE to ensure resolution has taken place.	1. Report to AE (during business hours) and/or call the PLF 1800 hotline (1800 51 51 31).	1. AE to report Incident to PLF. 2. AE to engage with PLF/ other relevant stakeholders to identify actions to take. 3. AE to ensure resolution has taken place.	1. Report to AE and/or PLF 1800 hotline (1800 51 51 31) as soon as practicably possible, within 24 hours.