

## **A Class of Their Own: Exploitation, Exclusion and Working Students**

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### **1. Overview**

The Fairfax Media expose, *The Great Student Swindle* by Anna Patty in December 2016 and the stories of gross exploitation it contained was a wake up call not only to our movement but more broadly the communities that we live in, the families of the young workers and children who work part time through their school years and later through University and TAFE.

This paper seeks to unpack these stories and their significance on many levels. First and foremost, on the heels of other recently publicised cases of wage theft such as 7/11, Caltex, Dominos – to name a few, these cases add weight to the argument that what we are witnessing is a little different to the garden variety underpayment and cash in hand employment.

What we are seeing is the proliferation and normalisation of wage theft and exploitation business models. Whilst some of these practices appear to be legal under current workplace laws, most are not. The real story here is the proliferation of illegal practices that range from crude and brazen cash in hand employment that make no attempt to meet minimum pay and conditions, the continuing use of pre *Workchoices* 'zombie' agreements through to sophisticated scams which seek to milk the Vocational Education and Training system, suppress wages and then bill the tax payers for the privilege.

To understand and appreciate this phenomenon, however, it is essential that we consider the context that these practices are occurring, the significance of demography and geography. This is a story about young workers and the community that they live in. It is no accident that these workers were targeted in these scams and exploitative practices. It was no accident either or down to luck that these students became conscious of their exploitation, organised themselves and spoke out. Both are conscious acts and are critical to this story.

The traditional narrative of young worker exploitation revolves around the use and abuse of junior pay rates, casualization status, unpaid trials and inappropriate classifications particularly in the hospitality and retail sectors which represent the most popular industries for the employment of young people. Whilst these practices continue to characterise exploitation in this space there has been a logical assumption made that the young workers most at risk are the ones who are the early school leavers and do not go on to further study. The evidence that is emerging here, however, suggests that, the young workers particularly in the hospitality industries are just as likely to be university students desperately seeking work to meet rising accommodation and living costs and day to day expenses.

The University of Wollongong, for example, has over 23,000 enrolled students many of whom reside in a city of 210,000. That's more than 10% of the population and a big slice of the labour market if we assume that the vast majority of these students are either employed or looking for work to support themselves. This gives a sense of scale and significance of the student labour market, particularly in University towns.

This, however, is not just a Wollongong story, this is a systemic failure of monumental proportions which, as has been revealed in several other cases, is being played out along the length and breadth of the whole country. It is, unfortunately, an Australian story.

## 2. Ashleigh's List

Ashleigh Mounser was an enrolled student at the University of Wollongong and like many of her peers was desperately seeking work to pay for her day to day expenses to enable her to continue and complete her studies. Wollongong University is an attractive place to study, with a backdrop of the escarpment in the west and endless beaches to the east it is too easy to miss the social dislocation, poverty and high youth unemployment that has characterised the steel city since the steel and mining shocks of the 1980s. Ashleigh soon discovered, however, that the cappuccino economy was not all it was cracked up to be. When you are competing with thousands of other students for part time work in a regional town your chances of landing a job are not great and if you do happen to land a job your bargaining power over pay and conditions is not really that strong.

The story of working student exploitation could have ended right there at the bottom of a coffee cup as Ashleigh finished her last shift at a Wollongong Cafe. The boss had initially offered her \$10 an hour for months on end and little time for her studies which was the reason she was in this predicament to start with. The reason that it didn't end there is because Ashleigh decided to do three things that would lead to the exposure of a national scandal in the exploitation of working students.

The first was to see whether her experience was a common one in the working student community and so she posted her story, her pay and conditions on an online University chat room and asked her peers whether they had similar experiences such as ridiculously low wages, cash in hand employment, unpaid trials and general experiences of what we know as wage theft.

The response was not only affirmative of Ashleigh's experiences it was also overwhelming in the sheer numbers of responses and details of exploitation on every level imaginable. That is where Ashleigh embarked on her second significant and decisive action which was to compile a list of employers in the city and the first hand accounts and contact details of their employees, their hourly rates of pay and cash in hand payments. It reads like a Yellow Pages of Exploitation.

Finally, and critically, when it was time to move, to go public with the explosive story, *The Great Student Swindle*, Ashleigh's group of working students backed her and themselves in. Twelve young working students gave their personal and confronting accounts of work and exploitation in the steel city.

Let's not forget that neither Ashleigh or any of the working students were, at that time, union members. They were not working off a script, an organising model or as part of a union campaign. If there was ever an organic example of collectivism and consciousness this is it. The second thing to note is the similarity with what a union campaign might attempt to do and that is to map a community and an industry, to organise and act collectively.

The main difference here is that Ashleigh was able to do this so much more effectively than we, as union leaders and organisers have been able to do with pre-unionised exploited young workers for decades. The motivation and capacity to compile 60 case studies of young workers and wage theft complete with mobile numbers of affected workers, years of service, rates of pay, names and addresses of the employers and details of exploitation is impressive. Imagine what might be possible if the Ashleigh's of this world had serious union resources and an organising space in the union movement from the beginning, or more importantly here, into the future.

***\* Ashleigh Mounser is currently a student at the Australian Film , Television and Radio School in Sydney and an MEAA member. Ashleigh's List of Employers and Working Students, the basis of this paper, was compiled in 2016 largely from social media chat rooms and subsequent mail contact. Whilst acknowledging the significance of her work there should not be the presumption that Ms Mounser necessarily endorses the author's analysis or conclusions.***

### 3. Wage Theft in Numbers

Of the 60 employers included in the original list (the list is now much greater) the vast majority were based in the Wollongong CBD along a 2km strip running from West Wollongong to the Beach and from Crown St to North Wollongong. Almost all of these cases were in the hospitality industry, bars, restaurants and clubs including several chains. The ages of the respondents ranged from 18 to 32 and almost all reported an hourly rate less than the minimum wage with only one reporting the payment of penalty rates. Their experiences are mostly from the years 2014-2016 and the original data has been extracted, tabled and analysed for this paper and the key results are summarised below.

- 60 businesses reported by workers
- 45 businesses are located within a 2km strip in the Wollongong CBD
- Average (mean) age of workers was 21 (range 18-32)
- Average hourly rate of pay \$12.50 per hour (range \$7.50 - \$20.00)
- The most common rates were \$10/hr (15 cases) and \$15/hr (14 cases)
- At least 50 businesses on the list have been either reported or strongly suspected as paying cash in hand (no payslips/group certificates being a key indicator)

#### 3.1 The Bosses Cash Rate

What is striking in these responses are the two spikes in hourly rates of pay at \$10 per hour and \$15 per hour. This does not appear to be a random occurrence. When asked about her account for this, Ashleigh's response in relation to the \$10/hour was that it is employer driven as no worker would nominate or negotiate a \$10 per hour deal.

Clearly, there is a level of organisation or collusion, more to the point, amongst many of the region's employers on this question. It is not only a question of what their competitors are paying their workers it is also a question of what these businesses have been getting away with for many years. Put simply, for so many employers this is a business model which up until now has had very few risks attached to it.

#### 3.2 The Workers Cash Rate

Equally significant is the perspective of the workers themselves and their view of what is a fair rate of pay given that in the majority of cases being 'on the books' was not even on the table when they accepted the job. The \$15/hour rate was regarded by many, according to Ashleigh as the minimum that they would expect to receive in these circumstances. In a sense this seems to be an underground standard that exists side by side with the award.

Without drawing too long a bow here, the evidence from this case study at least suggests a level of collective consciousness, communication and in a sense, bargaining on the part of the students. Ashleigh's List was their way of presenting a demand for a better deal. Their decision to take part in the Fairfax investigation, to work with the South Coast Labour Council and go public in the expose, *The Great Student Swindle* was a very conscious and significant action which provided the leverage to recoup stolen wages. In this respect it has already been successful with almost \$30,000 being paid back to workers in the first 4 cases settled with the assistance of the SCLC. A postscript to the original expose is that the Fair Work Ombudsman has only recently raided over 80 businesses just in the Wollongong CBD. We understand that this was largely based on intelligence gathered from Ashleigh's List.

#### **4. Universities, Colleges and Exploitation Hubs**

Perhaps one of the most significant and in some respects counter-intuitive observations in this case study is the question of why exploitation of young people is occurring where it is. Conventional wisdom and a wealth of evidence points to a direct link between skills, qualifications and levels of educational attainment and employment outcomes including earnings and conditions. You would expect the levels of exploitation and wage theft revealed in this case study to be more prevalent in a cohort of early school leavers and young workers who have not progressed to tertiary and further study. You would not expect these stories of exploitation to be centred around Law and Commerce students.

This is not to say that University students have a monopoly in this exploitation space but it certainly appears that they are very strongly represented. Below I offer some reasons as to why this might be the case and what implications this may have for the union movement.

##### **4.1 Exclusion of School Leavers from the Labour Market**

With high youth unemployment and over 20% of 15-19 year olds disengaged from work and study (abs 2011 census) we get a picture of social exclusion which has persisted for decades in the Illawarra with a downturn in the region's steel, mining and heavy industry base. It is not so much a question of employers having an aversion to exploiting these school leavers it's more a question of not needing to employ them in the first place with the notable exception of Traineeship/Apprenticeship programs which will be discussed later. Suffice it to say here, that VET programs can be a little more problematic for employers whose exploitation model of choice is cash in hand payments.

##### **4.2 University Students : The Transient Class**

The notion of the 'poor starving student' is not new and reflects the situation that University and TAFE students find themselves in at that stage of their lives and in many cases their first experience in employment. For many it is seen almost as a rite of passage that full-time students focusing on their studies will rely on some part time work to get them through a period that is usually temporary in duration before their entry into their chosen careers and vocational placements.

So what's new?

First, the massive expansion in student numbers in Universities has impacted the labour market in cities across the country. In regional areas and cities like Wollongong, however, these increases have had a much greater impact particularly in growth sectors such as hospitality and tourism, the industries where working students are concentrated and the sectors that they, as consumers have helped to grow. In the space of 30 years student numbers at the University of Wollongong alone have increased from 6,000 to over 23,000. Ironically, this is almost exactly the reverse trend and numbers employed in the steel industry over this same period.

When you consider that the City of Wollongong is now estimated to have a population of 2011,000 (2016 est) and a labour force in Accommodation and Food Services of over 6,750 (ABS 2011) it's easy to see how this expansion has had a significant industrial impact.

Second, the massive and rapid growth in the hospitality and related sectors, particularly in the last 20 years has resulted in the establishment of hundreds of new enterprises. Businesses which were established in the toxic industrial environments that were spawned from successive waves of industrial relations legislative changes including WorkChoices and current laws. These were the ultimate 'greenfield sites'. These bosses were encouraged to throw out the old rule books and be aggressive and innovative in their efforts to cut labour costs.

A necessary condition for this to occur, particularly in a union town, was to operate in secrecy and beneath the radar and to use the new laws and the agencies of the State to ensure that the risk of intervention from unions or the workers themselves was minimised. This supports the view of the ACTU leadership and the movement more broadly that Governments have not only run protection rackets for the businesses engaged in wage theft but that they encouraged them to develop these business models in the first place.

Third, the well known and acknowledged financial pressures on students driven by rising costs in their day to day expenses and accommodation coupled with a woefully inadequate level of student welfare support provided by Government has substantially increased the desperation of many students to accept almost any offer of a paying job either on or under the table.

Fourth, in this type of labour market and in these particular circumstances it is not too difficult to see why a restaurant owner might prefer to employ an articulate, well presented law student for \$10 per hour cash in hand, knowing full well that their tenure will only last 1 or 2 years at the most. It is all too convenient to do it this way than taking on a local school leaver who lives in the area and may be interested in longer term employment and whose parents might come knocking on their door and disrupt their business model, an outcome that has been known to occur.

Finally, many of the students themselves have made it clear that they are fully aware they are being "ripped off" and that cash in hand employment is not a good or legal model. The point they repeatedly make and one that must be heeded by all is that it is not-negotiable as a condition of employment, raising a number of alarming questions about the integrity of the existing industrial relations system not to mention superannuation, workers compensation and taxation implications. They feel that there is simply no alternative given their situation and in the context of the relatively short period of employment they expect to have in these businesses, these are sacrifices they are prepared to make. The employers who engage them are also acutely aware of this given their reactions to the students that have challenged them about their rights.

What we are left with is a large and growing section of the labour market, a class of *Transient Workers*, who are skilled, culturally suited to and readily exploitable by this section of the hospitality industry. They are unhappy with but generally conscious of their exploitation at the hands of their employers.

## **5. Worst Practice Exploitation Models: The Outback Steakhouse**

One particular example stands out from the rest in these case studies, not just because of their level of exploitation but because of their sophistication and their presentation of their employment practices as legitimate and legal. The Outback Steakhouse, an Australian themed diner, had its birth in the United States and is owned by the Bloomin' Brands group of companies, one of the largest chains in that country. The Australian version of the Outback chain consists of 8 restaurants in NSW and Queensland. This restaurant appears to target students for its workforce in more ways than one. It does not accept written job applications and provides very little to its employees in writing who are regarded and paid as permanent employees but are, for all intents and purposes, a casual labour force.

The workers, themselves, are mostly employed by a separate company, run by the Outback's Australian Boss, Mark Ivancic, *Icon Restaurants Australia*. ICON landed the employer deal of the century when in 2002 it had a Certified Agreement approved by the then IRC known as a LK Division 2 non-union agreement with its employees which, effectively reads like a zero hours contract, cashing out leave in the form of 'loaded rates of pay' and would have a snow flakes chance of passing a BOOT (Better off Overall Test) under the Fair Work Act or even meeting basic conditions in the award.

Yet, as we know, this and other “Zombie” agreements continue in perpetuity until and unless a current employee challenges them in the Commission.

### **5.1 Kiara's Story**

Kiara, a working student who is taking on Outback for backpay, took on a job with Outback Steakhouse in January 2014. She was not alone, at least another dozen were starting at the same time, a tell tale sign of labour churn at these establishments as an integral part of the business model. Kiara was required to have an RSA certificate, enabling her to serve alcohol, as a condition of her employment and her rate of pay was \$11.60 per hour – flat. No penalties, no shift allowances no public holiday loadings. As it turned out, everyone worked different hours each week with no minimum number of shifts and yet no worker was deemed a casual. The Agreement had no capacity for the employment of casuals, everyone was a permanent, employed on a weekly basis and whose ordinary hours could be determined or changed with 24 hours notice.

Now you would think that was a pretty good deal for the Outback bosses, but they could do better.

### **5.2 Would You Like a Fake Traineeship With Your Steak?**

The Icon Agreement had only 3 classifications (with little more than 1 dollar per hour between them) and the lowest classification, titled 'Standard' was coincidentally a training grade. Now given that the Vocational Education & Training System was being privatised at a rate of knots, the opportunity arose for the development of some pretty innovative training models with the assistance of some private training providers (RTO's).

In Kiara's case, and that of others interviewed and recently reported by Fairfax Media, she did not begin her employment as a trainee, she accepted a part-time job, not a Traineeship. A couple of months later, however, and shortly before the start of their shift, Kiara and her team of new employees were summoned to a meeting where they were asked to sign up for some extra training and an opportunity to get some of their skills recognised. There was a mountain of paper work to sign but no time to read through it and most signed up as they were told that it would not cost them anything and they had nothing to lose. Besides their shift was about to start.

In fact, what they had signed, unbeknown to a number of them, was a three year Australian Traineeship contract. A strange thing to do for full-time University students. Stranger still was the fact that there was very little, if any training actually provided. According to Kiara there were a couple of visits of 2 hours with some group work around basic and self explanatory hygiene concepts. 2 visits in 6 months. Just long enough it seems for tax payers to pay the private RTO for their efforts and allow the bosses to consider some incentive payments for showing such commitment to training our young workers.

Problematic in this business model, however, was the lack of paper work. In deed, after months of trying and letters of demand to the employer, the RTO, the Apprenticeship Centre and the NSW Government to produce the their complete training documentation, it seems that no one can find the Training Plan. Kiara and her workmates certainly had not seen one.

A greater problem for the boss is the training contract which was acquired by Kiara from a source other than the employer. In order to even qualify for the Traineeship, Kiara needed to be working at least 21 hours per week. Her employer states as much in the signed contract. Kiara's records, however, clearly show that the average hours worked during the length of her traineeship was 10.5 hours. Slight problem for the Boss and an explanation is currently being sought along with backpay for Kiara.

## **6. International Students, Internships and the New Frontier in Exploitation**

### **6.1 Guardian Strata**

As it happens, it was the ASIC records of ICON, Outback and their Directors which led us through an intricate and complex web of related companies and one in particular that contained the most shocking examples of working student exploitation in this group of case studies.

Guardian Strata is a Sydney based property services company that deals with body corporates and other clients in the property sector and is part owned by the ICON/Outback Director, Mark Ivancic and managed on a day to day basis by it's other director, Ossie Pisanu. It has a small team of regular paid staff and at various times a considerably larger team of unpaid interns performing their accounting, data analysis, administrative and other functions as required by the employer. The interns were originally sourced from Navitas as part of Vocational programs and over a 4 year period Navitas provided over 45 unpaid interns. Other interns were sourced from Universities and elsewhere. Most worked at least 40 hours per week as interns with a duration of 2 months to over 6 months at a time.

These are the accounts of several international interns and their explanations, in their own words, of why they paid for the privilege of working at Guardian for no pay. They wished to remain anonymous for obvious reasons.

#### **Intern 'X' says:**

"Not all interns were fresh graduates - There were interns who's very experienced in IT working free at Guardian as well, they were struggling looking for a job because of language proficiency - the employer should really compensate at least travelling expenses for the work they did but it didn't happen of course "

#### **Intern 'Y' remarked:**

"I had to pay to work there and they did not pay me anything, I needed local experience."

#### **Intern 'Z' confirmed what others had advised:**

"I found it through Navitas"

There was one eye witness account, however, which captures the depths of exploitation and something akin to practices of modern slavery:

"She [The intern] was sacked for being on the phone or the net and she dropped on to her knees on the floor in the middle of the office - crying and begging him [the boss] not to let her go."

Can you imagine paying thousands of dollars for an internship so that you can work 40 hours a week or more for no wages and then beg your boss not to sack you from a job you don't actually have ?

If there was such a thing as a vulnerability or 'at risk of exploitation' index then international students would have to be at the extreme end of the spectrum. Not only are they up against the same barriers and exploitative practices as the Australian students, they have some special scams targeted at them. The promise of a foot in the door, extra points towards other visas and citizenship along with the growth and privatisation of the VET market have made International students an integral part of the modern exploitation business model. They are the 'exhibit A' of exclusion from the regulated employment system and as these examples graphically illustrate, clearly show the relationship between exclusion and exploitation.

## 6.2 Australian Internships – Pushing the Envelope

There are a range of established educational institutions and providers both public and private who have dived head first into this lucrative up-front fee paying unpaid internship space. Navitas, mentioned earlier is but one of many. Students can participate with valid visas either directly from overseas or once they are in Australia. Fees range from \$2,000 to over \$20,000 depending on application fees and the off-site training component (where it exists) as part of the internship deal. Airfares and accommodation, of course are extra.

The author was fortunate enough to find a copy an actual agreement, a contract no less used by the Professional Internship Provider, *Australian Internships* to sign up international students. Below are excerpts of some of the more interesting terms and conditions.

### Excerpts Internship Agreement

#### **3. Specifications of the Professional Internship Program**

*The training positions of the Professional Internship Program have the following specifics:*

- a. Positions are available for 6-26 weeks*
  - b. Positions are non-paid*
  - c. Positions are full-time (5 days per week)*
  - d. Interns are not entitled to annual leave or time off during the internship*
  - e. Interns may be requested to provide flexibility with location if difficult fields are desired.*
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#### **4.6 Not a Recruitment Agency**

*The intern acknowledges that Australian Internships is not a recruitment agency and thus does not guarantee employment with the Host Organisation after the internship finishes. The intern shall not ask the Host Organisation for pay or future employment during the internship.*

#### **8. Insurance**

##### **8.1 Intern to obtain Medical, Accident, Travel and Personal Liability Insurance**

*An intern must obtain comprehensive Medical, Accident, Travel and Personal Liability Insurance, which policy must insure the intern on an indemnity basis for death and personal injury, physical or mental illness, public liability for an amount regarding any one event of not less than AU\$2 million, hospital cover, and transportation to the Intern's country of residence.*

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##### **8.4 Insurance Policy to Australian Internships Satisfaction**

*The Medical, Accident, Travel and Personal Liability Insurance obtained by the intern under clause 8.1 must be to Australian Internships reasonable satisfaction (including with an insurer which Australian Internships approves). If Australian Internships notifies the intern it is not reasonably satisfied with the insurance policy, the intern must immediately obtain an insurance policy to Australian Internships' reasonable satisfaction.*

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#### **9. Intern's Obligations and Responsibilities**

*f. The intern will perform the duties outlined in the Training Agreement at a high standard and with all due skill, care and attention with regard to the level of the knowledge, experience or education the intern has represented to Australian Internships he or she possesses.*

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**13.4 Invalid reasons for rejecting or cancelling an internship**

*Applicants are not allowed to reject a placement offer made by Australian Internships or leave their placement after starting for any of the following reasons:*

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*c. Commuting distance to the Host Organisation from accommodation.*  
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*f. Changes in internship hours.*

*g. Personal issues/relationships with other staff members and the internship supervisor.*

*h. Level of supervision offered. Each company has differing Training and Supervision policies which it adheres to.*

*i. Level of responsibility and tasks allocated. This is ultimately determined by the Host Organisation and independent on the qualifications/experience and in the performance of the intern.*

The above clauses have not, to our knowledge been tested in the courts in terms of crossing the line from a vocational program to a de facto employment contract but it would appear that this program is a little different to the work experience most Australian students are expected to undertake at school.

The fact that the intern is expected to pay, effectively, their own workers compensation insurance over and above their internship fees, which in this case do not even include any face-to-face training from the provider, speaks volumes as to what is going on here. Further, there appears to be no limitations on hours of work for the interns or for that matter controls on levels of responsibility or productive work. This space is a legal free-for-all and explains, in an unrelated example, Guardian Strata's practice of a revolving door of free intern labour for years.

So confident is *Australian Internships* of their legitimacy and legal position that they boast on their website that:

***“When you participate in an internship through Australian Internships, you can be assured that we are fully compliant with Fair Work Australia guidelines. In addition, we maintain regular communication with Fair Work Australia regarding quality internship options for international students and young professionals.”***

It would be interesting to know how *Fair Work Australia* regards internship contracts such as the one referred to above.

What we do know, however, is what Australian businesses think of *Australian Internships*. They love them, what's there not to like about free labour? Here is what one company had to say in their testimonial posted on the Australian Internships website.

***“Once our Interns landed all we as a business needed to worry about was guiding them into the areas they wanted to work. For the very small cost of the work equipment we received an FTE [Full Time Equivalent] for the internship period.”***

There is no doubt that there are many internship programs, historically, that have benefited the students and job seekers that have participated in them for the stated objectives of those programs. Equally, there can be no doubt from the examples outlined above that many internship programs have become a new frontier for exploitation of vulnerable international students and those desperate to increase their chances of staying on in Australia as skilled migrants.

## 7. Lessons for the Union Movement

### #1 Exclusion Leads to Exploitation

If exclusion is the cancer, inclusive organisation is the answer. The fact of the matter is that the young workers featured in these case studies have been excluded on many levels. From work, from the protections of the law and the regulated industrial relations system and unintentionally, from the union movement as well. They have organised themselves in the shadows of the established union structures. Now the union movement has a choice: Tear down the walls and change our structures that were established for different conditions, and let the next generation of workers in - or wait a few years and have this discussion again without the resources, density or momentum for change that is building across the country right now.

### #2 What can be done:

2.1 All full time students at any level of study should be offered free – complimentary associate membership of the union movement through a national umbrella program that is educationally focused and allows young workers to access information about basic workplace rights, pay and conditions as well as providing information about unions and campaigns. It would also encourage young members to speak up and report cases of exploitation. There should be special efforts to identify and support working international students. They need to be included and organised, not ostracized.

2.2 Working students that sign up to the young worker program should be given an individual member number that should ultimately remain with them throughout their working lives and across different jobs, breaks in employment and further study. If we want 'unionists for life' then we need to make it as easy as possible for members to stay with the union movement and give our unions an ability to track the membership and understand changes in work patterns and the labour market.

2.3 Establish a Working Student Alliance at Campuses across the country. Ideally it would promote the associate membership program outlined in 2.1 and be supported by existing campus trade unions and where possible student unions. These organisations could also organise their own actions on the ground in relation to uncovering exploitation and provide an opportunity for students to collectively organise and take action on the ground themselves. The aim is to encourage collective consciousness and action from the very beginning – before they begin their careers full-time.

2.4 Begin a program of workplace rights awareness for the parents of children under the age of 18 who are working increasingly long hours in chains and other workplaces. Whilst the case studies in this paper involve students over the age of 18, there is no doubt that exploitation occurs before the 18<sup>th</sup> birthday as well. This program could be piloted in regions by regional /State TLC's and a team of officials and delegates rostered to P&C or P&T meetings, answering parents questions and handing out a take home reference flier courtesy of the union movement.

2.5 An independent inquiry needs to be established to investigate and expose exploitation, wage theft and the various business models that are used for this purpose. Ideally, it would have hearings around the country and would be chaired by an eminent IR figure.

**#7 Finally, a Lesson for all Working Students: Stand Up – Speak Out – Stick Together** (*The Three Rs were designed to get students through school - the Three Ss will help them survive the workplace.*)