

Submission  
No 24

**INQUIRY INTO MODERN SLAVERY RISKS FACED BY  
TEMPORARY MIGRANT WORKERS IN RURAL AND  
REGIONAL NEW SOUTH WALES**

**Organisation:** SSI  
**Date Received:** 27 February 2025

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slavery risks faced by  
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# Acknowledgement of Country

SSI acknowledges the Aboriginal and Torres Strait Islander peoples as the First Australians and Traditional Custodians of the lands where we live, learn and work. We pay respect to Elders past and present and recognise their continuous connection to Country.

## Background

SSI welcomes the opportunity to provide this submission to the New South Wales (NSW) Parliament's Committee Inquiry into modern slavery risks faced by temporary migrant workers in rural and regional NSW.

SSI is a national non-for-profit organisation that delivers a range of human services that connect individuals, families, and children from diverse backgrounds with opportunities – including settlement support, disability inclusion programs, community engagement initiatives and training and employment pathways. At the heart of everything we do is a drive for equality, empathy, and celebration of every individual.

SSI was founded in Sydney in 2000 with the aim of helping newly arrived refugees settle in Australia. Over time, our expertise in working with people from diverse cultural and linguistic (CALD) backgrounds served as the foundation for a gradual expansion into other social services and geographical areas.

In 2018, SSI merged with Queensland-based Access Community Services, and in 2019 opened in Victoria, providing an extensive footprint across the eastern coast of Australia. In 2023-24, SSI supported over 60,000 people across almost 60 programs and community-based services nationally. We are also a leading provider of evidence-based insights into the social sector and are known as an organisation that can reach communities that are considered 'hard to reach'.

SSI is an umbrella organisation for 17 migrant resource centres, multicultural services and specialist human-service agencies.<sup>1</sup> Some of our members are located in regional and rural NSW. SSI acknowledges the contribution of [Mosaic Multicultural Connections](#), based in Newcastle that delivers services across northern NSW to this submission.

With respect to modern slavery, SSI has developed and is delivering its Strategies to Prevent Modern Slavery (SToP) program funded by the Australian Government, to raise awareness of modern slavery among migrants and how people with lived experience and communities can respond in NSW (Sydney, Coffs Harbour and Newcastle) and Queensland (Logan and surrounds). In addition, SSI's NSW Multicultural Centre for Women's and Family Safety, that promotes culturally appropriate, evidence-based and community informed responses to domestic, family and sexual violence in NSW, including that experienced by migrant and refugees, has encountered instances of modern slavery in the forms of forced marriage and domestic servitude. This has also been the case in SSI's delivery of the Australian Government's Status Resolution Support Services Program with people seeking asylum.

This submission provides case studies that illuminate Terms of Reference (a) and (c) and provides a detailed response to (l).

SSI is available to be called upon to elaborate further on our submission.

# Summary of SSI Recommendations

## Recommendation 1:

As part of a mix of responses to address forced labour risks for temporary migrants, the NSW Government should invest in resources to build and maintain the capacity for service providers of the Australian Government Settlement Engagement and Transition Support (SETS) Program in NSW to respond to modern slavery. This should include targeted investment in the provision of modern slavery identification, support and response training that is culturally responsive to migrant, refugee and people seeking asylum contexts in NSW. Grants that fund civil society operated programs and projects is one strategy identified by the National Action Plan to Combat Modern Slavery Program 2020-25.

## Recommendation 2:

Following an evaluation of the effectiveness of Recommendation 1 (invest in building and maintain capacity of settlement providers in NSW to respond to modern slavery), the NSW Government should:

- Require mandatory training in modern slavery to all workers in first responder roles across NSW.

## Recommendation 3:

The NSW Government should invest in resources to broaden the scope of the Office of Anti-slavery Commissioner's Community of Purpose to sectors and industries beyond healthcare. The settlement sector should be the next focus.

# Lived experience case studies

Case Studies – Northern NSW (provided by Mosaic Multicultural Connections)	
<p><b>Participant Background*</b></p> <p>*details changed to protect anonymity</p>	<ul style="list-style-type: none"> <li>• A couple on 482 visa (Temporary Skills Shortage TSS Visa now known as Skills in Demand SID visa) were hired and worked for a chicken farm. The husband works as a farm manager and is working alone, without help, covering five chicken sheds 12 hours/day 7 days/week. It's manually demanding work; and his wife is assisting him despite not being paid for her work. Their work conditions seem gruelling. She's afraid that her husband could collapse inside the shed due to exhaustion. While their employer has mentioned the intention to provide help, the fact that it's been over a year with no support is alarming and concerning.</li> <li>• A man holding a 482 visa, who is employed as a chef/cook, has said he is working 7 days a week and working beyond normal hours with under payment of wages and unsuitable working conditions.</li> <li>• A man is working as a mechanic in a remote area and is unable to drive as the employer took his (international) driver's license away. The employer requires the man's wife to work in the employer's garden without pay. He also prohibits the couple from going into town to do grocery shopping or to attend church service on Sundays.</li> </ul> <p><i>Mosaic workers have observed that it seems like the 482 visa has loopholes which needs to be addressed.</i></p> <p><i>In Mosaic's experience, workers on a 482 visa are fearful of reporting their unreasonable and slavery-like working conditions for fear of losing their jobs.</i></p> <p><i>Mosaic's frontline workers believe there should be an easily accessible helpline where a worker who is being exploited can make a report and access assistance when their rights are breached e.g. with working hours, working conditions or payment.</i></p>
<p><b>Current</b></p> <p>The main issues they are facing in relation to modern slavery</p>	<ul style="list-style-type: none"> <li>• Underpayment of wages (as stipulated in their job contract)</li> <li>• Deplorable working conditions (unsafe and unreasonable)</li> <li>• Working long hours beyond what's in the job contract</li> <li>• Maltreatment by employer (as described above)</li> </ul>
<p><b>Future</b></p>	<ul style="list-style-type: none"> <li>• Report to police (if location is known)</li> <li>• Report to the Union</li> </ul>

<p>How has Mosaic been able to support the person to address modern slavery (e.g. support, referral, etc)</p>	<ul style="list-style-type: none"> <li>• Provide info to a pro bono lawyer</li> <li>• Provide address and contact of their client's embassy</li> <li>• Settlement worker has reported to their country's economic (or labour) attaché</li> <li>• Support to find a new employer/work</li> </ul>
<p><b>Options</b></p> <p>What are some of the things that would have made it easier for this person, and the services supporting them, to address the risks of modern slavery among temporary migrant workers</p>	<ul style="list-style-type: none"> <li>• An Immigration HELP line especially for 482 visa holders</li> <li>• An Immigration officer to visit locations to check on the employer or worker (if location is known)</li> <li>• A regular visit by Immigration to check the biggest employers in the area who employ large numbers of people on 482 visas.</li> </ul> <p><i>Note: Most 482s are afraid to report for fear of losing their jobs</i></p>

<p align="center"><b>Case Study – SSI</b></p>	
<p><b>Participant Background*</b></p> <p>*details changed to protect anonymity</p>	<p>Lina* was accepted onto the Status Resolution Support Services (SRSS) program, for people seeking asylum, in January 2025. The program is funded by the Department of Home Affairs with narrow eligibility criteria to support highly vulnerable people seeking asylum. She was referred after a long trafficking journey and has been receiving support from the Red Cross Support for Trafficked People's Program, while her case is active with the AFP.</p>
<p><b>Current</b></p> <p>The main issues they are facing in relation to modern slavery</p>	<p>She is a victim-survivor of modern slavery, specifically domestic servitude.</p>
<p><b>Future</b></p> <p>How has SSI been able to support the person to address modern slavery (e.g. support, referral, etc)</p>	<p>Lina is receiving assistance from Safe Place Therapy for mental health support and is on the waitlist for counselling sessions from NSW STARTTS – a specialised statewide torture and trauma service. The SSI case manager is working with STARTTS to get these sessions covered by the Department of Home Affairs, as a part of the SRSS program. The client has been provided links into their ethnic/cultural/faith community and is also being assisted in accessing housing services as she is currently living in temporary accommodation. She would like to one day volunteer or work with other women who have been through what she has, and once her English skills are improved, which is a major goal for her.</p>

# Invest in culturally responsive community awareness initiatives

## Strategies to Prevent Modern Slavery (SToP) program

SSI's Strategies to Prevent Modern Slavery (SToP) is funded by the federal Attorney General's Department. Combating modern slavery through grants that fund civil society operated programs and projects is one strategy identified by the National Action Plan to Combat Modern Slavery Program 2020-25.

SToP aims to raise community awareness and education about three forms of modern slavery abuses: forced marriage, domestic servitude and forced labour, through in-language sessions targeted to community groups known to be vulnerable to modern slavery. From October 2023, SToP conducted community consultations and individual interviews that formed the basis of the creation of community-based videos, culture-specific toolkits, vignettes and guides for facilitators to use in subsequent workshop sessions. SToP has trained bilingual staff to facilitate these sessions, educating communities and raising awareness about modern slavery, including existing resources. For example, in the case of forced labour, the Work Rights Hub and Fair Work Ombudsman; and MyBlueSky when discussing forced marriage; and promoting support and referral pathways.

Since December 2024 SSI has been delivering SToP information and awareness sessions targeting communities, settlement services, English language institutes and religious and community leaders across New South Wales and Queensland. As of the date of this submission, SToP is expected to have raised awareness and engaged over 330 participants spanning language groups that SSI's review of the evidence suggests have elevated risks of modern slavery (which can vary by the particular community and context). SToP sessions have been delivered to communities in Arabic, Bahasa, Bengali, Burmese, Dari, Farsi, Hindi Kurdish Kurmanji, Mandarin, Nepalese and English. To date, sessions have been conducted across metropolitan Sydney in areas that comprise significant proportions of those target community language groups.

SToP's sessions are facilitated through bilingual staff who work in partnership with community leaders (such as the Indonesian, Bengali), not-for-profit services (e.g. settlement services), employment services (e.g. Max Employment) and religious leaders (e.g. the Muslim community in the Auburn area). The impact of our awareness raising sessions is likely to be broader than the immediate geographical area targeted because of the interconnectedness of cultural, religious and ethno-specific groups that have networks that extend beyond metropolitan locations.

With respect to rural and regional NSW, where temporary migrants have been known to experience modern slavery conditions, particularly forced labour, SSI has formed partnerships with local community based organisations such as Mosaic Multicultural Connections, NSW Service for the Treatment and Rehabilitation of Torture and Trauma Survivors (STARTTS), Zara House and Max Employment to work with us to facilitate the community sessions. Through these partner organisations, SSI has run some of these sessions directly to clients and community members. Our consultation process identified that these services are likely to be the first responders for many experiencing labour exploitation; meaning that working through them is critical in reaching the broader community.



# Invest in holistic responses that are responsive to people with lived experience's needs and situations

Raising awareness of the risks of modern slavery, at the individual victim-survivor and impacted worker end of the continuum, is necessary but insufficient to combat modern slavery. To ensure that people impacted by modern slavery can successfully navigate their situations, restoring agency, choice and control by working in a culturally responsive, trauma informed way, while offering a range of practical resources and pathways that meet their needs is essential.

Placing too much emphasis on legal and policing pathways to respond to modern slavery, such as contacting the Australian Federal Police, without sufficient consultation and partnership, can risk re-traumatising the victim-survivor. The length of time and uncertainty involved in undertaking legal and investigatory proceedings, the risk of escalation on the part of perpetrators when complaints are raised, and the common reticence and lack of trust in institutions by those who have experienced exploitation, are some of the constraints that dissuade victim-survivors to undertake that legal and policing pathway. Further, impacted people have several more immediate concerns that need to be addressed through appropriate support, such as safety planning and assessing the feasibility of obtaining alternative employment within the context of the modern slavery situation.

The area of gender-based violence can provide some insight and guidance on the nuanced challenges associated with coercive relationships. For example, SSI's gender-based initiatives and work through its NSW Multicultural Centre for Women's and Family Safety,<sup>2</sup> support women and families navigating intimate partner violence. This work has involved cases of modern slavery, mostly forced marriage and domestic servitude.

With respect to forced labour, insecure visas and a lack of alternative pathways to remain in Australia both enable modern slavery and dissuade temporary migrants from disclosing their situation, let alone reporting it to enforcement agencies. Illustrating this, one survivor member of SToP's reference group advised that:

*"I know several survivors who have been deported due to reporting to police".*

In SSI's work addressing modern slavery, victim-survivors are advocating for an agreed protocol between the Australian Federal Police and the Australian Government Department of Home Affairs to ensure that rather than risking deportation for disclosing modern slavery, that victim-survivors instead obtain support for their situation. Deporting temporary migrants who disclose modern slavery is unjustly punishing the victim-survivor rather than directing enforcement efforts towards perpetrators.

All of this points to a key question that the NSW Government should investigate and respond to: What would help temporary migrants experiencing modern slavery to come forward?. Much more needs to be invested in understanding the cycle of exploitation and the circumstances temporary migrants find themselves in to identify potential solutions. Adopting an approach that is holistic and culturally responsive to the needs of people with lived experience is essential to responding to all forms of modern slavery. SSI notes that the Office of the NSW Anti-Slavery Commissioner has identified that its funding constraints have limited investment in survivor co-design.<sup>3</sup>

## Invest in building and maintaining first responders' capability and capacity

Australia's legal framework, established by the Modern Slavery Act's commencement in 2019, means that legal and policing responses to modern slavery are relatively recent. As part of this evolution, there is greater recognition that initiatives to respond to modern slavery must include a more holistic approach to improve identifying and responding to modern slavery.<sup>4</sup> This requires 'first responders', those who are likely to already engage with at-risk communities, to mitigate exploitation. The settlement sector is one such first responder group, comprising organisations that specialise in delivering support to newly arrived migrants and refugees, a demographic that is particularly susceptible to modern slavery, and with existing links with ethno-specific and multicultural organisations.

For example, across NSW, almost 40 small, medium and large organisations are funded by the Australian Government's Settlement Engagement and Transition Support (SETS) Program to work with refugees and other eligible permanent migrants (excluding Australian citizens) and their communities to address their settlement needs. These service providers are generally staffed by bilingual staff who are well placed to provide specialised support to temporary migrants. Settlement providers have a deep understanding of issues facing newly arrived migrants and refugees through their delivery of existing federally-funded programs and expertise in helping newcomers to navigate service systems and develop meaningful social connections.

Settlement providers have expertise working in a culturally responsive, trauma-informed way, which is essential to supporting people impacted by modern slavery. Most workers in the settlement sector come from culturally diverse backgrounds, having intimate knowledge and understanding of community challenges; positioning them to be most able to subsequently assess and respond to modern slavery. Governments have a critical role in working with settlement providers to not only build their understanding of modern slavery, as it is defined by Australia's legal framework, but to engage with the sector in dialogue to better understand the complexities, nuances and challenges of navigating those coercive, exploitative relationships while also empowering victim-survivors.<sup>5</sup>

The NSW Government has the opportunity to take a leadership role by investing in building the capacity of these providers to not only identify modern slavery, but to provide support and appropriate referrals. This investment should first be targeted to SETS providers as their experience and expertise to work sensitively with migrants and refugees positions them well to respond to the modern slavery contexts, including in regional and rural NSW. This would address the Office of the NSW's Anti-Slavery concerns about funding constraints that has limited investment in training of frontline workers.<sup>6</sup>

Greater investment in training is required to build these first responders' knowledge and capability to be familiar with what constitutes modern slavery, and how to respond to disclosures that support victim-survivors in a trauma-informed, culturally responsive way. To ensure such training is undertaken and is effectively applied in practice, corresponding funding and resources for first responders to undertake the training should be provided.

### Recommendation 1:

**As part of a mix of responses to address forced labour risks for temporary migrants, the NSW Government should invest in resources to build and maintain the capacity for service providers of the Australian Government Settlement**

**Engagement and Transition Support (SETS) Program in NSW to respond to modern slavery. This should include targeted investment in the provision of modern slavery identification, support and response training that is culturally responsive to migrant, refugee and people seeking asylum contexts in NSW. Grants that fund civil society operated programs and projects is one strategy identified by the National Action Plan to Combat Modern Slavery Program 2020-25.**

Building the settlement sector’s capacity is one major first step that the NSW Government can take in advancing a broader system response to modern slavery. An evaluation of the investment in settlement providers’ support of temporary migrants at risk of modern slavery should form the basis of instituting mandatory requirements that all workers in first responder roles be familiar with modern slavery; similar to child protection mandatory requirements. In SSI’s STOP reference group, one member observed that police, a key first responder group, themselves receive limited training on modern slavery.

**Recommendation 2:**

**Following an evaluation of the effectiveness of Recommendation 1 (invest in building and maintain capacity of settlement providers in NSW to respond to modern slavery), the NSW Government should:**

- **Require mandatory training in modern slavery to all workers in first responder roles across NSW.**

## **Progress community-wide, multi-sectoral responses**

The multiple forms of modern slavery cuts across several domains, from the workforce and employment settings (forced labour) to home and personal networks (forced marriage, domestic servitude).

Accordingly, responses need to be community wide and multi-sectoral. A multi-sectoral approach that collaboratively includes services, organisations, industry and employer groups, requires appropriate resourcing. This collaboration will be able to identify at the system, sector and industry level, reforms that government, sector and industry can make, to address the risk of modern slavery, while also developing practice-based resources and responses and ensuring they are appropriately translated and suitable to different client contexts. First responder practitioners and service providers, alongside people with lived experience, should also be included in this collaboration. The Office of the NSW Anti-slavery Commissioner is ideally positioned to facilitate this collaboration, building on its Community of Purpose which has to date been focused on healthcare settings.<sup>7</sup>

**Recommendation 3:**

**The NSW Government should invest in resources to broaden the scope of the Office of Anti-slavery Commissioner’s Community of Purpose to sectors and industries beyond healthcare. The settlement sector should be the next focus.**

# Address substandard working conditions and underpayment of workers

While SSI recognises that substandard working conditions or underpayment of workers per se does not meet the legal threshold definition of modern slavery, and that the Inquiry is focused on forced labour of temporary migrant workers in regional and rural NSW,<sup>8</sup> these practices remain harmful and are likely to be co-occur in situations of forced labour modern slavery.

In SSI's experience, migrants and refugees experience substandard working conditions or underpayment across a variety of visa categories in metropolitan, regional and rural settings. Feedback provided during SToP consultations consistently identified that underpayment of wages as an issue. Migrant and refugee communities settling in rural and regional areas are at higher risk due to not having local work experience. It has been reported to SSI that because of this, most migrants and refugees are forced to take jobs that have exploitative work practices; and due to lack of access to alternative employment, most refrain from reporting these practices to the authorities. One community sector worker based in regional NSW, indicated to SToP, that:

*“Clients are working for \$10 and are reluctant to report as they tell her, ‘something is better than nothing’.”*

Another point raised with SToP is that employers are well aware of the vulnerability associated with a person's migrant status, some of whom:

*“As soon as they see that you are a migrant, they treat you differently. I struggled to find employment in Australia for a long time.”*

At a broader policy level therefore, more commitment to addressing labour exploitation, particularly of migrants and refugees, should be considered. This would be one strategy to prevent the risk of modern slavery particularly with forced labour. Equally important and complementary to this, is to develop viable, sustainable pathways to alternative employment with local employers.

**Authorised by:** Sandy Fitter, Group Head, Stakeholder Relations, Research and Policy

**Contact:** Tri Nguyen, Social Policy Lead,

**Date:** 27 February 2025

## References

<sup>1</sup> SSI. (2025). *Member organisations*. Retrieved from <https://www.ssi.org.au/about-us/member-organisations/>

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<sup>3</sup> Office of NSW Anti-slavery commissioner. (2024). *Engaging for freedom, NSW Anti-slavery Commissioner's Annual Report 2023-2024*. Retrieved from [https://dcj.nsw.gov.au/content/dam/dcj/dcj-website/documents/legal-and-justice/anti-slavery-commissioner/plans-and-discussion-papers/engaging\\_for\\_freedom-oasc\\_annual\\_report\\_fy2024.pdf](https://dcj.nsw.gov.au/content/dam/dcj/dcj-website/documents/legal-and-justice/anti-slavery-commissioner/plans-and-discussion-papers/engaging_for_freedom-oasc_annual_report_fy2024.pdf)

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<sup>4</sup> Australian Government Attorney General's Department. (2024). *Modern Slavery Lived Experience Engagement and Empowerment*. retrieved from [https://www.ag.gov.au/sites/default/files/2024-11/modern-slavery\\_lived-experience-engagement-and-empowerment.PDF](https://www.ag.gov.au/sites/default/files/2024-11/modern-slavery_lived-experience-engagement-and-empowerment.PDF)

<sup>5</sup> David, K., & Salter, M. (2022). 'They are here without chains, but with invisible chains': Understandings of modern slavery within the New South Wales settlement sector'. *Social and Legal Studies*. 31 (1). 50-71. DOI: 10.1177/0964663921990103

<sup>6</sup> Office of NSW Anti-slavery Commissioner (2024). *Engaging for Freedom Annual Report 2023-2024*. Op. Cit.

<sup>7</sup> Ibid.

<sup>8</sup> Office of the NSW Anti-Slavery Commissioner. (2024). *Be our Guests: Addressing urgent modern slavery risks for temporary migrant workers in rural and regional New South Wales*. Retrieved from [https://dcj.nsw.gov.au/documents/legal-and-justice/anti-slavery-commissioner/plans-and-discussion-papers/Be\\_Our\\_Guests -](https://dcj.nsw.gov.au/documents/legal-and-justice/anti-slavery-commissioner/plans-and-discussion-papers/Be_Our_Guests_-_Addressing_urgent_modern_slavery_risks_for_temporary_migrant_workers_in_rural_and_regional_New_South_Wales.pdf)

[\\_Addressing urgent modern slavery risks for temporary migrant workers in rural and regional New South Wales.pdf](https://dcj.nsw.gov.au/documents/legal-and-justice/anti-slavery-commissioner/plans-and-discussion-papers/Be_Our_Guests_-_Addressing_urgent_modern_slavery_risks_for_temporary_migrant_workers_in_rural_and_regional_New_South_Wales.pdf)