

Enhancing Labour Mobility from Papua New Guinea Project Stakeholder Engagement Plan (SEP)

Prepared for the Labour Mobility Unit, Department of Treasury

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1 Introduction

This Stakeholder Engagement Plan (SEP) describes a program for stakeholder engagement, including public information disclosure and consultation to support the Enhancing Labour Mobility from Papua New Guinea (PNG) Project (hereafter the Project).

This SEP was developed in accordance with Government of PNG law and the World Bank's Environment and Social Framework (ESF) including Environmental and Social Standard ESS10 Stakeholders Engagement and Information Disclosure, and ESS7 - Indigenous Peoples. It is closely aligned with the Government of PNG's Draft National Labour Mobility Policy (2021).

1.1 Project Overview

The Project Development Objective is to strengthen government systems in Papua New Guinea that support workers and their households to benefit from overseas employment opportunities, with a focus on women and disadvantaged groups.

The primary Project beneficiaries are current and prospective seasonal/migrant workers and their families from across PNG. The Project will not place PNG seasonal/migrant workers overseas. Rather, the Project will support the design and operation of the PNG labour mobility initiatives across the labour mobility cycle including worker selection, recruitment and mobilisation; support whilst undertaking overseas employment, and return/reintegration.

The Project will be implemented by the Department of Treasury (DOT) in PNG, through its Labour Mobility Unit (LMU) which is responsible for coordinating PNG's Labour Mobility Program.

The Project will consist of four (4) components:

- Component 1. Strengthen systems and worker readiness to enhance benefits from overseas employment opportunities. This component involve three sub-comonents including i) assisting in the development of GoPNG systems and processes for effective management of a work-ready pool so as to support efficient mobilization of workers; ii) finance the development and delivery of work readiness training focuses on ensuring aspiring workers have basic skills necessary for employment as well as extending to the the customizaton and delivery of pre-departure training to temporary migrant workers before they depart; and iii) supporting the strengthening of the GoPNG's liaison and welfare functions to enhance support to workers (and their families) whilst they are overseas.
- Component 2. Enhance equity in access to labour mobility opportunities for PNG workers. The project will enhance access to labor mobility opportunities amongst disadvantaged PNG workers through outreach and enhanced preparatory activities, as well as support for financial inclusion. Three sub-components are envisaged across two phases: (i) special outreach efforts and preparatory support for disadvantaged groups, including females, (ii) support for financial literacy and inclusion of PNG workers and their families; and iii) establishment of a loan facility, working with financial institutions to offer voluntary, uncollateralised loan products for covering costs of pre-departure.
- Component 3: Boost impacts from employment overseas. This component would support the development and delivery of reintegration support services aimed at ensuring smooth,

successful integration of returned migrants in PNG, thereby enhancing the benefits of labor mobility for individuals, migrant families and their communities.

- Component 4. Project management and results monitoring including a PMU which houses relevant advisors recruited under the project and supports project monitoring and evaluation.

1.2 Purpose of the Stakeholder Engagement Plan

The purpose of the Project's SEP is to define a program for meaningful stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. Information disclosure, consultations and engagement with stakeholders under this SEP is focused on Project activities. However, as the Project will provide overall TA support for strengthening the PNG Labour Mobility Programme, some of the wider stakeholder engagement under the LMU programme is also covered.

The SEP specifies objectives, principles and activities for how the LMU and RHHs will communicate with different groups of stakeholders; and establishes a structured approach for engagement including a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and project-related activities. The SEP outlines a strategy for engagement with diverse ethnic groups and culturally appropriate approaches for consultation and information dissemination.

This SEP has been updated for the Project implementation phase. Information on stakeholder engagement conducted during project preparation is provided in Section 3.4.

2 Identification and analysis of stakeholders

Project stakeholders are defined as individuals, groups or other entities who:

- are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as '**affected parties**'); and
- may have an interest in the Project ('**interested parties**'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

Affected parties may also include '**vulnerable groups**' – persons who may be disproportionately negatively impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status¹ and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

2.1 Project Stakeholders

2.1.1 Affected parties

Project-affected parties include:

¹ Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

- Prospective seasonal/temporary migrant workers who meet host country criteria (e.g. age, skill level, sector)
- Current/returned seasonal/temporary migrant workers;
- Families and local communities of current/returned seasonal/temporary migrant workers;
- Local communities in provinces or districts where recruitment occurs;
- Employers of seasonal and temporary workers in A&NZ;
- Regional recruitment hubs or district and provincial administrations organising recruitment;
- Financial institutions engaged through the project to implement the pre-departure loan facility; and
- Training organisations engaged through the project to implement pre-departure training and worker readiness activities.

2.1.2 Interested parties

Interested parties include:

- Other national and sub-national agencies in PNG with some role in the migration process such as the Police and the Department of Health;
- Government agencies implementing the PLS, SWP and RSES in Australia and New Zealand;
- Government agencies/bodies tasked with implementing employment laws in Australia and New Zealand (i.e. Fair Work Ombudsman Australia, Worksafe NZ etc.)
- Trade unions in PNG, Australia and New Zealand and other peak body organisations which represent the interests of employers of seasonal or temporary workers under the schemes (for example, the Approved Employers of Australia Association);
- Employers and their peak body organisations in PNG;
- Other international organisations and civil society organisations working in the area of labour migration; and
- The public in PNG at large.

2.1.3 Disadvantaged/vulnerable individuals or groups

Within the Project, the vulnerable or disadvantaged groups may include:

- Women seasonal/temporary migrant workers;
- Female partners of seasonal/temporary migrant workers;
- Women-headed households in communities where recruitment occurs;
- Individuals with low levels of education including school dropouts and illiterate people in communities where recruitment occurs;
- Remote communities;
- People with disabilities in communities where recruitment occurs; and
- Marginalised groups such as those from outside traditional communities (i.e. economic migrants/informal settlers) living in communities where recruitment occurs.

Vulnerable groups within the communities affected by the Project will be further confirmed and consulted through dedicated means, as appropriate.

3 Stakeholder Engagement Program

3.1 Purpose of Stakeholder Engagement

The Project's stakeholder engagement program will be implemented over the project life-cycle with the following objectives:

- Providing timely and appropriate information during Project preparation and implementation to enable informed participation and feedback;
- Disclosing information and obtaining stakeholder input on the expected project benefits and any potential adverse impacts and proposed mitigation measures;
- Facilitating open and continuous communication and consultation between the Project's many stakeholders and communities;
- Encouraging equal participation of all affected groups in the consultation process; and
- Addressing stakeholder concerns or grievances in a timely manner.

3.2 Stakeholder Engagement Principles

The Project will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach:** Public consultations will be arranged during the whole life-cycle, carried out openly, free of external manipulation, interference, coercion or intimidation;
- **Informed participation and feedback:** Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities will be provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- **Inclusiveness and sensitivity:** The participation process for the project is inclusive. All stakeholders are at all times encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, members of remote communities, individuals with low education and school dropouts, and the cultural sensitivities of diverse ethnic groups.

3.3 COVID-19 Safe Engagement

The PNG Government has taken measures to restrict public gatherings, meetings and movement both within PNG and between PNG and neighbouring countries. The general public is also increasingly concerned about the risks of transmission, particularly through social interactions.

Given the highly infectious nature of COVID-19, the Project has developed a COVID-19 Safety Protocol for Project implementation (see Annex B). This Protocol identifies COVID-19 transmission risks associated with the implementation of the Enhancing Labor Mobility Project; outlines appropriate risk mitigation measures; and assigns roles and responsibilities for their implementation.

With the COVID-19 risk situation continuing to evolve, the Project will remain flexible and adapt its strategy to minimise COVID-19 infection risks in line with the Department of Treasury's practices.

3.4 Stakeholder engagement during project preparation

During project preparation, the LMU worked closely with the World Bank task team to ensure key stakeholders were identified, and consultation and information dissemination activities were carried out to source inputs and feedback on project design. A preliminary SEP was developed to guide this process.

3.4.1 Engagement with Government Agencies and other organisations

During preparation, several stakeholder engagement activities were conducted with government agencies and other organisations involved in labour mobility in PNG and Australia and New Zealand. These include:

- **Project scoping and preparation meetings** conducted by the LMU with support by the World Bank during project scoping (May - June 2020) and preparation (February – March 2021) to confirm the scope of the proposed project on labour mobility, exchange views with GoPNG agencies and other stakeholders, and agree on steps and a schedule for initiating project preparation. Meetings were also conducted with government representatives in Australia and New Zealand.
- **Social Assessment consultations** (February - March 2021) with national and subnational GoPNG agencies and A&NZ stakeholders. During these virtual meetings, information on the project and its design were presented to stakeholders; and the role of the different agencies in the implementation of the three labour mobility schemes was discussed with a particular focus on mechanisms to mitigate and manage the risks for workers and their families.
- **A National Workshop on Labour Mobility** (October 2021) with national and subnational GoPNG agencies and other organisations. During the workshop, the design of the Project and the findings of the Social Assessment and associated instruments were presented and stakeholders provided feedback.
- **Consultation with A&NZ Agencies** (October and November 2021) on project design and SA/SMP.

Key feedback on E&S risks and management measures from stakeholder engagements to date included:

1. A&NZ have established procedures such as thorough screening processes of employers to be approved under the schemes, and ongoing reporting requirements to ensure that employers comply with the schemes' provisions in terms of workplace-related issues and pastoral care. Regarding workplace-related issues, there is a preference for workers (and employers) to resolve these issues at the workplace. For several reasons, many workers avoid involving government agencies such as the Fair Work Ombudsman in Australia or the Labour Inspectorate in New Zealand. A&NZ agencies are supportive of the project's proposed support for training/mobilisation and liaison. They highlighted the importance of liaison and GoPNG's commitment to MOUs. It was requested that the Project and the LMU support existing grievance redress mechanisms (GRMs). The Project will support the LMU's liaison function through the LMU Worker Welfare and Wellness Officer . The Project GRM will

direct workers on assignment to A&NZ mechanisms whilst at the same time providing liaison support to PNG seasonal/migrant workers through this process.

2. The pastoral care responsibilities established under the schemes by A&NZ governments put most of the pastoral care responsibilities to employers. The system encountered challenges during the COVID-19 pandemic when many workers were unable to return to their sending countries (while others were unable to travel to A&NZ). Stakeholders highlighted that this pointed to the important role of government agencies in looking after the welfare of workers. A&NZ governments have recently strengthened their welfare engagements. In Australia, DESE established 19 labour mobility officer positions under the SWP based around the country. During the COVID-19 pandemic, SWP workers got access to the hotline that was established by the PLF for PLS workers. A review of the PLF Worker Welfare Framework is currently underway.
3. The LMU plans to expand mandatory pre-departure training for prospective workers to include a session on workers' rights in Australia/New Zealand with comprehensive and easy-to-understand information about where workers can seek redress in the event of workplace grievances. The Project will support the LMU in providing the training.
4. It was requested that the Project support the LMU welfare role. The Project will support the LMU Worker Welfare and Wellness Officer who provides PNG seasonal/migrant workers with another avenue of support. This role was deemed as extremely important by stakeholders.
5. Stakeholders had little understanding of the schemes' long-term impacts on participating workers and their families, including when workers return to PNG for good. They were concerned that there was no career guidance for returned workers in PNG to further their understanding of what the seasonal work experience could lead to, or how they could invest their savings into sustainable income-generating opportunities. They requested that the Project consider filling this gap. The Project will support the reintegration assistance provided by the LMU through which workers will receive financial literacy support and career guidance to make informed decisions on building their future in PNG.

3.4.2 Engagement with Target Beneficiaries/Communities

Due to the COVID-19 situation in PNG face-to-face consultations with target beneficiaries and their communities could not be conducted during project preparation. Instead, the Project conducted two virtual focus group discussions with approximately 20 departing workers from Enga, Madang and New Ireland in Port Moresby in March 2021, facilitated by LMU and PLF.

Key feedback on E&S risks and management measures from the focus group discussions with workers included:

1. Workers regarded their upcoming work in the meat processing industry in Australia under the PLS as a once-in-a-lifetime opportunity. They were keen to earn as much as possible and then invest this back into their families, businesses and communities. For most workers, the pre-departure costs were extremely high relative to their current level of savings and income. Some had to travel significant distances to the RRH to organise all required documents. The costs for first-time participants were covered by their district Member or the Provincial Governor. The group also included workers who had already been working in

Australia for 17 months under a different program. They had returned home due to COVID-19 and were planning to return to their previous place of work. These workers had to cover their own pre-departure costs on the assumption that they had enough savings from their previous overseas work. The costs were particularly high after February 2020 as workers had made several attempts to travel to Australia but COVID-19 had thwarted previous attempts. Workers, therefore, were supportive of the Project's plans to introduce pre-departure loan facilities but wanted to know more details about the conditions and the interest.

2. All workers were planning to work under the PLS for the first time and their focus was on the positive aspects associated with the opportunity, rather than the potentially negative impact of their absence on their families and communities. The family involvement in various activities under the Project received strong support from the workers.

The workers had undergone different training and work preparation programmes reaching from workers from New Ireland who underwent an 8-month process of work readiness training and work experience, to workers from Enga who had not received any work readiness training prior to pre-departure training. Workers supported the Project's involvement in training and specifically asked for vocational training and more work experience; additional information on the types of awards and pay structures in Australia; and specific cultural training.

3.5 Proposed Strategy for Consultation during Implementation

Stakeholders will be kept informed as the Project develops, including reporting on Project environmental and social performance and implementation of the SEP and the grievance mechanism.

Table 3-1: Stakeholder Consultations related to the Project

Project Component	Labour Mobility Cycle	Target Stakeholders	Consultation and Information Dissemination Methods	Responsibility
<p>Component 1 - Strengthen systems and worker readiness to enhance benefits from overseas employment opportunities</p> <p>Component 2 - Enhance equity in access to labour mobility opportunities for PNG workers</p>	Selection & worker readiness	<p>Prospective workers and their families</p> <p>Vulnerable groups</p> <p>Local communities</p> <p>Civil Society Organisations</p> <p>Provincial/District Governments with established RRHs</p>	<ul style="list-style-type: none"> • Outreach activities – including community and small group meetings – that are safe and culturally appropriate • Public announcements (radio) • Information desks in RRHs and LMU • Internet and social media (i.e. LMU website and Facebook page) • Outreach by local Members of Parliament. 	LMU & RRHs
	Employer-led Recruitment	<p>Prospective employers</p> <p>Selected workers and their families</p>	<ul style="list-style-type: none"> • Internet and social media (i.e. LMU website and Facebook page) • Meetings with families of selected workers that are safe and culturally appropriate • Phonenumber to LMU Worker Welfare and Wellness Officer within LMU 	LMU & RRHs
	Worker Mobilisation	<p>Selected workers and their families</p> <p>GoPNG National Agencies including Treasury, Police, Immigration</p>	<ul style="list-style-type: none"> • Meetings with families of selected workers that are safe and culturally appropriate • Consultations with departing worker groups • Phonenumber to LMU Worker Welfare and Wellness Officer within LMU 	LMU & RRHs
	Overseas Employment (Led by employers and A&NZ government agencies/contractors)	<p>Workers and their families</p> <p>Administrators of A&NZ labour mobility programmes and other relevant A&NZ agencies</p>	<ul style="list-style-type: none"> • Meetings with families of employed workers that are safe and culturally appropriate • Phonenumber to LMU Worker Welfare and Wellness Officer within LMU 	LMU & RRHs

Project Component	Labour Mobility Cycle	Target Stakeholders	Consultation and Information Dissemination Methods	Responsibility
		GoPNG National Agencies including Treasury, Police, Immigration	<ul style="list-style-type: none"> • Seasonal/migrant worker welfare monitoring tools (i.e. WhatsApp and/or tailored app; online survey tool) • Ministerial meeting • Workshop with GoPNG National Agencies • Coordination meetings with A&NZ program administrators and other relevant government agencies. • Coordination meetings with PNG Department of Foreign Affairs and High Commissions in A&NZ • Attendance at joint annual A&NZ seasonal/migrant worker forum 	
Component 3 - Boosting household impacts from labour mobility programmes	Return/reintegration (Led by RRHs & LMU)	Workers and their families Local communities Civil Society Organisations Provincial/District Government	<ul style="list-style-type: none"> • Meetings with all returning groups of workers in POM • Meetings with communities and families of returned workers involving Civil Society Organisations • Phonenumber to LMU Worker Welfare and Wellness Officer within LMU • Information desks in RRHs and LMU 	LMU & RRHs
Component 4 – Project Management	Overarching	GoPNG National Agencies	<ul style="list-style-type: none"> • Ministerial Meeting • Annual report to Parliament • LMU Facebook page and website 	LMU

3.6 Proposed Strategy for Information Disclosure during implementation

Information will be provided throughout the life cycle of the Project to target beneficiaries and communities, as well as other interested parties by building upon the channels of communication and engagement with stakeholders established during project preparation as per the table below:

Table 3-2 Information Disclosure during Project Implementation

Stakeholder	Information to be disclosed
Target beneficiaries/communities	<ul style="list-style-type: none"> • Project objectives and design • Project GRM; A&NZ Program GRMs; LMU Liaison Function • Project Social risk and impact management • Project implementation • Awareness messages on labour mobility opportunities
PNG Government agencies with role in labour mobility	<ul style="list-style-type: none"> • Project objectives and design • Project GRM; A&NZ Program GRMs; LMU Liaison Function • Stakeholder participation • Project implementation • Design of specific activities • Project Social risk and impact management • Project implementation outcomes – critical evaluation, performance gaps, corrective actions
A&NZ Government agencies involved in implementing aspects of the labour mobilities schemes	<ul style="list-style-type: none"> • Project objectives and design • Project GRM; A&NZ Program GRMs; LMU Liaison Function • Stakeholder participation • Project implementation • Design of specific activities • Project Social risk and impact management • Project implementation outcomes – critical evaluation, performance gaps, corrective actions
Other affected and interested parties	<ul style="list-style-type: none"> • Project objectives and design • Project GRM; A&NZ Program GRMs; LMU Liaison Function • Project Social risk and impact management • Project implementation

3.7 Proposed Strategy for engagement with diverse ethnic groups

PNG is one of the most culturally diverse countries in the world with over 800 languages and over 1,000 distinct ethnic groups and not one dominant group. Despite this diversity, common elements exist between groups and navigating differences in language, culture and custom is part of everyday life in PNG and national programmes are adept at dealing with this.

The Project will ensure that stakeholder engagement and information disclosure activities are designed and implemented using culturally appropriate approaches to identify and address any economic or social constraints that may limit opportunities to benefit from or participate in the project.

Strategies may include:

- Utilization of the strengths of the PNG state and commonalities between ethnic groups in target provinces such as government structures/organizations, shared language (i.e. Tok Pisin or Motu) and shared religion/beliefs (i.e. Christianity/animism) to guide broader communication and engagement approaches.
- Conducting rapid assessments in target provinces and communities to identify cultural groups (both traditional communities and settlers) and their language, decision-making structures and traditional communication channels and inform the design of nuanced community-level communication and engagement approaches.
- Use of Civil Society Organizations located within target provinces and communities to input into the design and lead delivery of community-level communication and engagement approaches.

3.8 Proposed strategy to incorporate the views of vulnerable groups

The Project will ensure that awareness-raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups take account of such groups or individuals’ particular sensitivities, concerns and cultural sensitivities and ensures a full understanding of Project activities and benefits. Vulnerability may stem from a person’s origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. minorities or fringe groups), dependence on other individuals or natural resources etc. Engagement with vulnerable groups and individuals require the application of specific measures and assistance designed to facilitate their participation in Project-related decision making so that their awareness of, and input to, the overall process is commensurate to those of the other stakeholders.

The Project will ensure that vulnerable groups have the opportunity to participate in, and benefit from, Project activities. It will adapt engagement and communication strategies to the specific needs of vulnerable groups and households, including, for example, household outreach in Tok Pisin, Hiri Motu or Tok Ples where necessary, and the use of verbal communication, audio-visuals or pictures instead of text.

During implementation the project will seek to engage key vulnerable groups in the following ways:

Vulnerable Group	Method
Women in sending communities including (prospective) women migrant workers and female spouses of migrant workers	<ul style="list-style-type: none"> • Engage “Women in Agriculture”² groups through one-on-one phone calls and emails providing them with information and inviting comment;
Women-headed households in sending communities	<ul style="list-style-type: none"> • Meetings and focus groups with women from “Women in Agriculture” groups during field trips providing them with information and inviting comment.
Individuals with low education levels and illiterate individuals in sending communities	<ul style="list-style-type: none"> • Use of mass media (radio) and simplified project information flyer; • Meetings and focus groups during field trips providing them with information and inviting comment.

² Women ins Agriculture groups have been established in most districts.

Vulnerable Group	Method
People with disabilities	<ul style="list-style-type: none"> • Use of mass media (radio) and project information flyer; • Consultations during field trips.
Remote communities	<ul style="list-style-type: none"> • Use of mass media (radio) and simplified project information flyer; • Consultations during field trips to remote sending communities.
Youth	<ul style="list-style-type: none"> • Use of mass media (radio) and project information flyer; • Consultations during field trips.

Under Project Component 2.2, more and more effective outreach and support to disadvantaged groups will be provided. This includes funding for strategies to engage with vulnerable groups.

3.9 Sourcing and Consideration of Feedback

Some of the information dissemination channels described above are integrated with feedback mechanisms (e.g. face-to-face consultations), while others will be used to provide information about feedback mechanisms to stakeholders:

Stakeholder	Feedback mechanism
Selected workers/current workers and their families and/or direct beneficiaries (workers, families, communities) of project financed activities	<ul style="list-style-type: none"> • Feedback via phone/web application to LMU Worker Welfare and Wellness Officer and RRH
	<ul style="list-style-type: none"> • Written feedback via LMU website, Facebook page, Email
	<ul style="list-style-type: none"> • Face-to-face feedback during meetings with selected workers, their families and communities
	<ul style="list-style-type: none"> • Online survey for seasonal/migrant workers (before, during – at regular intervals, and post assignment)
Target beneficiaries/communities	<ul style="list-style-type: none"> • Feedback via phone to RRH
	<ul style="list-style-type: none"> • Written feedback via LMU website, Facebook page, Email
	<ul style="list-style-type: none"> • Face-to-face feedback during meetings with selected workers, their families and communities
All stakeholders (project-affected parties and interested parties)	<ul style="list-style-type: none"> • Written feedback via LMU website, Facebook page, Email
	<ul style="list-style-type: none"> • Feedback in person at information desks in RRHs

All credible and serious feedback will be collected and analysed by the LMU’s LMU Worker Welfare and Wellness Officer . A database will be set up that will include the main points of feedback, concerns and grievances raised by different stakeholder groups (see also GRM below).

Feedback will be considered throughout the project cycle as follows:

Feedback collected during Project preparation	- Considered in overall design of Project
Feedback collected during Project implementation	- Compiled and analysed every six months - Considered in design of specific activities - Considered during annual project reviews - Considered during mid-term review
Feedback collected during Project closure	- Considered during final project review

4 Resources and Responsibilities for implementing stakeholder engagement activities

4.1 Human and financial resources

The LMU within the Department of Treasury is in charge of stakeholder engagement activities. The **LMU Director** will provide oversight and support coordination of Project implementation across PNG government departments, with Provincial Authorities and with A&NZ governments and labour mobility programmes. The LMU has committed to hiring an **LMU Worker Welfare and Wellness Officer**. This position will be responsible for worker liaison/labour and welfare functions being supported by the Project. The LMU has also committed to hiring an **Country Liaison Officer** (based in Australia) who will also support this function.

A Project Management Unit (PMU) will be established within the LMU (and regional administrations where required) to support project implementation. The PMU will be headed by a Project Manager and include at a minimum a Financial Management Specialist, Procurement Specialist, M&E Specialist, Social Risk and Welfare Specialist, and Admin Officer. The PMU will include specialists to support E&S risk management and the implementation of the SA/SMP and associated instruments including: i) a **Social Risk and Welfare Specialist** (full time) who will support the LMU Director and PMU Project Manager to ensure that the SEP is effectively implemented; and a **Gender and GBV Specialist** (part-time) will support the LMU Director and PMU Project Manager to ensure that gender and GBV risks are managed.

Stakeholder engagement will be the responsibility of all members of the LMU and PMU and will be part of their TOR. The SEP implementation budget is included in Component 4 of the Project (US\$ 3.5 million).

4.2 Management functions and responsibilities

The Department of Treasury (DOT) through the LMU is responsible for Project implementation, including overall coordination, results monitoring and communicating with the World Bank on the implementation of the Project.

The LMU is responsible for carrying out stakeholder engagement activities while working closely together with other entities, such as provincial and district administrations and RRHs. The LMU will be supported by the PMU and technical specialists, through project technical assistance covering key

results areas including pre-departure training, reintegration support, outreach in PNG, outreach in A&NZ will be engaged through the Project to support the LMU.

The LMU with the support of the PMU will be responsible for implementing the SEP, while working closely together with other entities, such as RRHs. The stakeholder engagement activities are formally documented in the LMU's progress reports to the World Bank, and in the LMU's annual report to Parliament. In addition, the LMU provides ad-hoc updates to the Ministerial Committee which may also include stakeholder engagement activities.

5 Grievance Redress and Liaison

5.1 Project Grievance Redress Mechanism

The LMU will establish and maintain a project GRM to manage complaints and grievances concerning project financed activities being implemented in PNG.

The main objective of a Grievance Redress Mechanism (GRM) is to address and resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved.

The Project will establish a GRM to adequately address project-related grievances – including those relating to specific project activities and the implementation of the broader PNG LM programme which the Project will be supporting.

The Project GRM provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM:

- Provides affected people and Project beneficiaries with avenues for making a complaint or resolving any dispute that may arise during the implementation of the Project;
- Ensure that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Avoid the need to resort to judicial proceedings.

The Project GRM will be publicly available on the LMU's Facebook page and website.

The Project GRM for project-affected and interested parties operates through the following steps:

- Step 1: Complainants can submit grievances either orally or in writing via suggestion/complaint box, in-person during consultations or via email to the LMU's Worker Welfare and Wellness Officer or to RRHs. Complaints may be made anonymously, and confidentiality will be ensured in all instances, including when the person making the complaint is known.
- Step 2: RRHs or the LMU Worker Welfare and Wellness Officer records the grievance, capturing information concerning the complainant and grievance; confirming the grievance is project-related (and not programme-related)³; classifying the grievance

³ The LMU's Worker Welfare and Wellness Officer and Country Liaison Officer will be trained to differentiate project related grievances from programme related grievances, and will provide guidance to RRHs if required.

based on the typology of complaint, and providing the initial response as quickly as possible. Complaints and grievances will be based on the characteristics of the complainant (e.g., Government agency, civil society organisation, vulnerable groups, persons with disabilities, etc.), and also the nature of the complaint. Any serious or sensitive grievances⁴ communicated to RRHs will be elevated to the PMU within the LMU immediately, and a proposed resolution is provided by the LMU Worker Welfare and Wellness Officer within fifteen working days. For all other grievances, the RRH/LMU Worker Welfare and Wellness Officer ensures that the grievance is investigated and a proposed resolution is provided within 30 working days.

- Step 3: If the complainant is satisfied with the response proposed by the RRH or LMU Worker Welfare and Wellness Officer, the grievance is closed. If the complainant is not satisfied with the resolution proposed, the grievance will be raised to the LMU Director. Upon receipt, the LMU Director will provide an initial response to the complainant, then will investigate the grievance and propose a resolution within 10 working days.
- Step 4: If the complainant is satisfied with the response proposed by the LMU, the grievance is closed. If the complainant is not satisfied with the resolution proposed, the grievance will be raised to the Project Steering Committee for consideration and resolution within 90 days.
- Step 5: Once all possible redress has been proposed and if the complainant is still not satisfied then they are advised of their right to seek legal recourse.

In the early stages of engagement, project stakeholders and affected communities must be made aware: (i) of how they can access the GRM; (ii) who to lodge a formal complaint to; (iii) timeframes for response; (iv) that the process must be confidential, responsive and transparent; and (v) alternative avenues where conflicts of interest occur.

RRHs and the LMU Worker Welfare and Wellness Officer log all project-related grievances received. RRHs forward an up-to-date file with all logged grievances to the LMU Worker Welfare and Wellness Officer once per quarter for inclusion in a centralized log at the LMU. The LMU Worker Welfare and Wellness Officer feeds this information into project progress reports.

For the above, the LMU Worker Welfare and Wellness Officer will be supported by the PMU Social Risk and Welfare Specialist.

The Project's GRM will be equipped to handle cases of SEA/SH and has mechanisms in place for confidential reporting with safe and ethical documenting of SEA/SH issues. Further, the GRM will establish processes to immediately notify both the LMU Director, PMU Project Manager and the World Bank of any SEA/SH complaints, with the consent of the survivor. The Project will also raise awareness amongst project beneficiaries that the GRM can be utilized to raise concerns or complaints regarding

For instance, complaints about non-transparent selection of workers for the work-ready pool refer to the LMU's programme and are not Project related. In contrast, complaints about the conduct of specific project activities such as financial literacy training are Project related.

⁴ Complaints relating to SEA/SH issues or other issues that have caused or may cause significant harm to people or the environment.

project-related SEA/SH incidents. These activities will be further developed and supported by the PMU Gender and GBV Specialist.

5.2 Supporting Overseas Workers and their Families and Communities

The Project will support the LMU and RRHs to strengthen their liaison functions to provide additional support to PNG seasonal/migrant workers, and their families and communities whilst workers are on assignment in Australia or New Zealand.

5.2.1 Program Grievance Redress Mechanism for workers in Australia/New Zealand

Grievance Redress Mechanisms have already been established for the three labour mobility schemes.

While in Australia/New Zealand, workers will follow the guidelines of the respective schemes and/or the regulatory bodies in Australia/New Zealand.

The table below summarises the A&NZ Program grievance mechanisms that are in place which consist of avenues open to all workers in Australia/New Zealand as well as of avenues specifically established for workers under the schemes.

The LMU's Liaison Function will assist workers to access and navigate these A&NZ mechanisms as follows:

- The LMU Worker Welfare and Wellness Officer meets all workers before their travel to A&NZ and stays in contact with workers through overseas assignment through following means:
 - Social Media (i.e. Facebook, Whatsapp and/or tailored App);
 - Phone or email
- The LMU Worker Welfare and Wellness Officer supports PNG seasonal/migrant workers whilst they are on assignment wherever necessary including providing advice, and assisting them to access and navigate existing A&NZ grievance mechanisms.
- Where the LMU is informed by a PNG seasonal/migrant worker, Approved Employer or A&NZ program administrator/agency of a grievance or concern the following steps will be taken:
 - If the grievance concerns an approved employer, the LMU Worker Welfare and Wellness Officer can raise the grievance with the Director of the LMU who will in consultation with the overseeing body (DFAT, DESE, MFAT) of the programme/scheme seek clarification and action as appropriate;
 - If the grievance concerns a feature of the scheme itself, the LMU Worker Welfare and Wellness Officer can raise the grievance with the Director of the LMU who will seek clarification and action with DFAT, DESE or MFAT, depending on the nature of the grievance
 - If the complaint remains unresolved after six weeks, the Director of the LMU will undertake a high-level representation; and
 - If the complainant is not satisfied with process or its outcome, the LMU will consider the case, and will undertake high-level representation where appropriate.

- Workers may also contact staff at their High Commission in Australia or New Zealand. The PNG Department of Foreign Affairs and the LMU will coordinate where appropriate including on any necessary in-country representation/site visits.
- LMU Worker Welfare and Wellness Officer keeps log of all complaints/grievances raised by workers overseas and the resolution of these complaints/grievances and feeds this information into project progress reports.

During project implementation, the LMU will ensure this approach is consistent with A&NZ program approaches to grievance/issue management that are outlined in A&NZ program implementation documents.

The LMU will strengthen its capacity to strengthen the LMUs role through the PLF Support Service and Toso Vaka o Manu – to receive, respond and/or refer grievances and be receive reports or be notified of incidents, and then work with respective programs, AEs and other stakeholders to resolve these issues as they arise

The LMU will also strengthen coordination arrangements with A&NZ including conduct of i) regular (i.e. at least bi-monthly) update calls/meetings btw LMU and High Commissions - DFAT/MFAT where current issues can be discussed; and ii) conduct semi-annual bilateral meeting between the GoPNG’s DOT/LMU and DoFAs and Australian DFAT and PLF; and NZ’s MBIE, MFAT/Toso Vaka o Manu program and the development of coordination arrangements between DOT/LMU, DoFA and High Commissions in Australia and NZ

The project will support additional monitoring tools to allow the GoPNG to directly monitor worker welfare including use/development of communication, information sharing and worker welfare monitoring tools (i.e. WhatsApp and/or tailored app; online survey tool) between PNG seasonal/migrant workers and the LMU which assist the discrete, culturally appropriate and responsive facilitation of concerns, complaints and grievances through existing A&NZ grievance mechanisms.

Table 5-1 A&NZ Labour Mobility Grievance Mechanisms

LM scheme	Mechanisms in A&NZ
RSE	<p>Employment-related grievances</p> <ul style="list-style-type: none"> • RSE workers have same workplace protections as New Zealand workers • The steps are: <ul style="list-style-type: none"> ○ Talking to employer/Project Manager ○ Involving RSE Labour Inspectors from New Zealand’s Labour Inspectorate or relationship managers under the RSES ○ Mediation through MBIE’s mediation services or through independent mediators ○ Determination through the Employment Relations Authority <p>General wellbeing and welfare grievances</p> <ul style="list-style-type: none"> • The steps are: <ul style="list-style-type: none"> ○ Talking to employer/Project Manager ○ Contacting MBIE / relationship managers

	<p>Note: The LMU continually engages with PNG seasonal/migrant workers through its liaison function, and can refer complaints that arise from their employment experiences and their general wellbeing to New Zealand’s Labour Inspectorate or relationship managers.</p>
SWP (see also Annex C)	<p>Employment-related grievances</p> <ul style="list-style-type: none"> • SWP workers have same workplace protections as Australian workers • The steps are: <ul style="list-style-type: none"> ○ Talking to employer (could be a labour-hire company) ○ Involving Fair Work Ombudsman or Department of Education, Skills and Employment (DESE) ○ Dispute Resolution Process under FWO <p>General wellbeing and welfare grievances</p> <ul style="list-style-type: none"> • The steps are: <ul style="list-style-type: none"> ○ Talking to employer (could be a labour-hire company) ○ Department of Education, Skills and Employment (DESE) / Pacific Labour Facility (PLF) hotline ○ Consultation process with the LMU and collaboration on more difficult circumstances or behaviour issues. <p>Note: The LMU continually engages with PNG seasonal/migrant workers through its liaison function, and can refer complaints that arise from their employment experiences and their general well-being to the DESE, DFAT and the PLF</p>
PLS (see also Annex C)	<p>Employment-related grievances</p> <ul style="list-style-type: none"> • PLS workers have same workplace protections as Australian workers • The steps are: <ul style="list-style-type: none"> ○ Talking to employer (could be a labour-hire company) ○ Involving Fair Work Ombudsman or DESE ○ Dispute Resolution Process under FWO <p>General wellbeing and welfare grievances</p> <ul style="list-style-type: none"> • The steps are: <ul style="list-style-type: none"> ○ Talking to employer (could be a labour-hire company) ○ Pacific Labour Facility (PLF): PLS Worker Welfare Hotline, or PLS Worker Welfare Case Manager ○ Consultation process with the LMU and collaboration on more difficult circumstances or behaviour issues <p>Note: The LMU continually engages with PNG seasonal/migrant workers through its liaison function, and can refer complaints that arise from their employment experiences and their general well-being to DFAT and the PLF</p>

The LMU Liaison Function will be equipped to handle cases of SEA/SH reported by seasonal/migrant workers whilst in Australia, and has mechanisms in place for confidential reporting with safe and ethical documenting of SEA/SH issues. The LMU will also raise awareness amongst seasonal/migrant workers about ways to raise cases of SEA/SH and seek support in Australia and NZ. These LMU functions will be further developed and supported by the PMU Gender and GBV Specialist in consultation with A&NZ programs.

5.3 Grievance Redress for Families and Communities of Overseas Workers

The Project will provide TA to strengthen the LMU and RHHs liaison functions with the families and communities of overseas workers. This will include assisting families and communities when they have

a complaint regarding their indirect involvement whilst a PNG seasonal/migrant worker is on assignment in A&NZ.

- Step 1: Complaints should be raised in the first instance with the regional administration. Only if the regional administration is unable or unwilling to resolve the issue, it should be raised with the LMU. The only exception are cases where the complaint is about the regional administration.
- Step 2: Complainants can submit grievances either orally or in writing via suggestion/complaint box, in-person during consultations, telephone, SMS, or email, to the LMU Worker Welfare and Wellness Officer within the LMU or to RRHs. Complaints may be made anonymously, and confidentiality will be ensured in all instances, including when the person making the complaint is known. The LMU and RRH will take a unified approach with the LMU supporting and assisting regional administrations.
- Step 3: RRHs or the LMU Worker Welfare and Wellness Officer at the LMU records the grievance, capturing information concerning the complainant and grievance; confirming the grievance is project-related; classifying the grievance based on the typology of complaint, and providing the initial response as quickly as possible. The classification will be based on the characteristics of the complainant (e.g., spouse or children of migrants, extended family of migrant, community members, etc.), and also the nature of the complaint (e.g., lack of opportunity to communicate with migrant, lack of remittances received, family emergency, natural disaster in community etc.). If the grievance concerns other stakeholders in Australia/New Zealand, the LMU Worker Welfare and Wellness Officer will take a consultative and collaborative approach with all stakeholders. Any serious or sensitive grievances communicated to RRHs will be elevated to the Director of the LMU immediately, and a proposed resolution is provided by the LMU Worker Welfare and Wellness Officer within five working days. For all other grievances, the RRH / LMU Worker Welfare and Wellness Officer ensures that the grievance is investigated and a proposed resolution is provided within 10 working days.
- Step 4: If the complainant is satisfied with the response proposed by the RRH/LMU Worker Welfare and Wellness Officer, the grievance is closed. If the complainant is not satisfied with the resolution proposed, then they are advised of their right to seek legal recourse.

RRHs and the LMU Worker Welfare and Wellness Officer log all grievances received. RRHs forward an up-to-date file with all logged grievances to the LMU Worker Welfare and Wellness Officer once per quarter for inclusion in a centralized log at the LMU. The LMU Worker Welfare and Wellness Officer feeds this information into project progress reports.

6 Monitoring and Reporting

The SEP will be periodically revised and updated as necessary in the course of Project implementation in order to ensure that the information presented is consistent and reflects the evolving nature of information required at different stages of the Project, and that the identified methods of engagement remain appropriate and effective in relation to the Project context and specific phases of the development. Any major changes to Project-related activities or schedule will be reflected in the SEP.

Project stakeholder engagement activities will be documented through regular progress reports, to be shared with the World Bank. Progress report summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by the LMU Worker Welfare and Wellness Officer

(with the support of the PMU Social Risk and LMU Worker Welfare and Wellness Officer) and referred to the LMU Director, PMU Project Coordinator and Project Steering Committee. The progress report summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner.

Information on public engagement activities undertaken by the Project during the year will be included in the annual report of the LMU to Parliament.

The project will include a key performance indicator "Project related complaints to the Grievance Redress Mechanism (GRM) satisfactorily addressed within the specified timeframe" to monitor the implementation of the Project GRM.

Annexes

Annex A: Summary of Stakeholder Engagement during Preparation

Project Scoping Meetings May - June 2020	
Country	Stakeholder
PNG	<p>Government agencies and authorities</p> <ul style="list-style-type: none"> • Department of Treasury • Department of Higher Education, Research, Science and Technology • Department of Labour and Industrial Relations • Enga Provincial Administration • Lae City Authority • Namatanai District Development Authority • Madang District Development Authority <p>Australian and New Zealand agencies and organisations in PNG</p> <ul style="list-style-type: none"> • Department of Foreign Affairs and Trade (DFAT), Australia • Ministry of Foreign Affairs and Trade (MFAT), New Zealand • Australia Pacific Training Coalition (APTC) • Pacific Labour Facility <p>Private sector employers and civil society organizations</p> <ul style="list-style-type: none"> • Niupay • ABT • Infrastructure Construction Engineering LTD • SME Net Solutions • Women’s Business Resource • Steamships • SME • Bank of Papua New Guinea • Bank South Pacific • Business Council PNG • Family Farms Program in PNG • Pacific Women
Australia	<ul style="list-style-type: none"> • Department of Foreign Affairs and Trade (DFAT), Australia • Pacific Labour Facility • Approved Employers Association • Food Industry People
New Zealand	<ul style="list-style-type: none"> • Ministry of Foreign Affairs and Trade
Project Preparation Meetings	
Country	Stakeholder
PNG	<p>Government agencies and authorities</p> <ul style="list-style-type: none"> • Labour Mobility Unit –Department of Treasury • Department of National Planning and Monitoring • Department of Labour and Industrial Relations • Department of Higher Education, Research, Science and Technology • Regional Hubs Coordinators, East Sepik Province • Regional Hubs Coordinators, North Fly District Office, Western Province • Regional Hubs Coordinators, Enga Province • Regional Hubs Coordinators, Madang District Development Authority

	<p>Australian and New Zealand agencies and organisations in PNG</p> <ul style="list-style-type: none"> • Australian Department of Foreign Affairs and Trade • New Zealand High Commission in PNG • Australia Pacific Training Coalition <p>Private sector employers and civil society organizations</p> <ul style="list-style-type: none"> • Financial and Banking Service Providers in PNG <p>International organisations</p> <ul style="list-style-type: none"> • World Bank PNG Office •
Australia	<ul style="list-style-type: none"> • Australian Department of Education, Skills and Employment • Pacific Labour Facility • Labour Hire Licensing Compliance Unit, Office of Industrial Relations, QLD
New Zealand	<ul style="list-style-type: none"> • NZ Labour Inspectorate, Migrant Exploitation Team
Consultations for Social Assessment, February – March 2021	
Country	Stakeholder
PNG	<ul style="list-style-type: none"> • Pacific Labour Facility
Australia	<ul style="list-style-type: none"> • Department of Foreign Affairs and Trade • Department of Education, Skills and Employment • Fair Work Ombudsman • Pacific Trade and Invest • Labour Hire Licencing Unit, Queensland • Skybury Coffee
New Zealand	<ul style="list-style-type: none"> • Ministry of Business, Innovation and Employment • Labour Inspectorate
Consultation with Outgoing Workers, March 24-25, 2021	
PNG	<ul style="list-style-type: none"> • 20 workers from New Ireland, Madang and Enga Provinces in preparation for their departure under the SWP
Consultation with Financial Institutions (June, August, November)	
PNG	<ul style="list-style-type: none"> • Consultation with various FIs and MFIs on loan facility design
Consultations on Design and E&S work (October and November 2021)	
PNG	<ul style="list-style-type: none"> • 25 prospective workers in Madang undertaken by the LMU
Australia and NZ	<ul style="list-style-type: none"> • NZ High Commission; Australia High Commission; DFAT; PLF; MFAT, MBIE
PNG - National Workshop	<ul style="list-style-type: none"> • Department of Treasury; Department of Labour and Industrial Relations; Department of Higher Education, Science, Research and Technology; Department of Foreign Affairs; East Sepik RRH; North Fly RRH; World Bank.
Australia	<ul style="list-style-type: none"> • Consultation with DFAT and PLF on project design

Annex B: COVID-19 Safety Protocol: Project Implementation

Purpose

The purpose of this Protocol is to identify COVID-19 transmission risks associated with the implementation of the Enhancing Labor Mobility Project; outline appropriate risk mitigation measures; and assign roles and responsibilities for their implementation.

Context

An outbreak of the coronavirus disease (COVID-19) caused by the 2019 novel coronavirus (SARS-CoV-2) has spread rapidly across the world since December 2019. On 11 March 2020, the World Health Organization (WHO) declared a global pandemic. By 18 June 2021, the WHO had reported over 177 million confirmed cases and 3,840,000 deaths worldwide.

The first COVID case in PNG was recorded in March 2020. The GoPNG activated the National Emergency Response Operation Committees (NEOCs) on the 27th of January 2020. COVID-19 was declared a national emergency on March 11, 2020. A Joint Agency Task Force for COVID 19 under the National Control Centre has been established to coordinate the national response. The official website is: <https://covid19.info.gov.pg/>

NDOH in partnership with the World Health Organisation published the Niupela Pasin Transitioning to a 'New Normal' Handbook.

The Department of Treasury has produced a guide, Treasury Niupela Pasin, outlining the Department of Treasury's approach to operating safely within an environment where COVID-19 is present. The guide outlines practices put in place by the Department of Treasury to continue to work and operate safely and maintain physical distancing wherever possible.

COVID-19 Transmission Risks

ELMP will involve project workers including government staff, PMU staff, and consultants, working to deliver enhanced labour mobility activities across PNG.

The project's design includes:

- Technical assistance provided by in-country consultants (based in LMU and/or regional administrations)
- Conduct of meetings, workshops and community engagements
- Technical assistance for community outreach activities; and
- Support for training and worker-readiness activities.

These engagements present a high risk of COVID-19 transmission i) between project workers, ii) from project workers to target beneficiaries, and iii) amongst target beneficiaries. The risk of transfer between outside project workers to communities is viewed as the greatest risk.

COVID-19 Transmission Mitigation Measures

The Project will implement the following measures to mitigate the risk of virus transmission during project implementation:

- Routinely review the national, provincial and district COVID-19 situation and the restrictions put in place by the government to contain virus spread and send updates to all LMU officials on a bi-weekly basis or sooner if the situation has changed;

- Ensure that all project workers including government staff, PMU staff, and consultants undertake regular COVID-19 risk awareness and mitigation training and commit, through the project's code of conduct, to managing COVID-19 risks associated with project activities;
- Ensure project beneficiaries are made aware of COVID-19 transmission risks and prevention measures (general and project-specific) throughout project implementation by utilizing project communication channels including website, Facebook page, community notice boards; and before the commencement of on-ground project consultations/activities;
- Conduct all project activities as per the national restrictions or advisories including staying home when sick, good hygiene and social distancing, and minimize direct interaction between project agencies and beneficiaries / affected people where possible;
- Ensure that project workers do not conduct face-to-face activities when they are feeling unwell or have been identified as a close contact of a COVID-19 case. Support Government, PMU staff and consultants to get tested for COVID-19 before recommencing face-to-face activities. In the event that a case is identified by medical experts, the PMU must be notified immediately and will work closely with medical staff and authorities to ensure support is given to the officer/consultant to go through the necessary protocols including isolation and treatment
- Monitor and report on the implementation of project COVID-19 prevention measures during the conduct of project activities through the project's existing monitoring and reporting framework

Roles and responsibilities

The Head of the LMU, with the support of the PMU Manager, is responsible for ensuring the implementation of the Plan.

All Project workers including government staff, project staff, and consultants are required to carry out their duties in accordance with this Plan.

Resources

GoPNG COVID19 situation reports and advisory: <https://www.health.gov.pg/subindex.php?news=1>

GoPNG COVID19 awareness-raising resources: <https://covid19.info.gov.pg/index.php/covid-19-awareness/>

Tools

The following tools will be developed/utilized by LMU to ensure COVID-19 mitigation measures are complied with:

- ELMP Code of Conduct
- ELMP Pre Mission Checklist / Project Worker Health Certification
- ELMP Training Record
- ELMP COVID Safe Meeting Guidance
- ELMP Consultation Record (to be updated with COVID awareness and COVID safe meeting check box) and attendance/participant health certification.

Annex C: A&NZ Grievance Mechanisms

SWP and PLS Grievance Management

The key roles and responsibilities for obtaining and progressing support for SWP and PLS workers while in Australia are outlined below. For all these services, workers have access to interpretation services through the [National Translating and Interpreting Service](#)

Identified need	support	Stakeholder responsible	Source of referral/ contact	Notes
SWP/PLS matters advice and clarification on:	workplace including and	SWP/PLS Employer	Approved Employer – HR Representative If AE cannot be reached: contact DESE on (02) 6240 5234 or email SeasonalWorker@dese.gov.au FWO	If a worker is employed by a labour-hire company, the Host or direct employer (e.g. Farm) will not have responsibility or be able to provide information or advice to workers on these issues.
SWP worker wellbeing and welfare support, including general assistance for:		SWP Employers Participating Countries' Labour Sending Units (LSUs) and their Australian based Country Liaison Officers and/ or Consulate staff, also provide ongoing support and assistance to workers.	Approved AE SWP Worker Wellbeing and LMU Worker Welfare and Wellness Officer . If AE cannot be reached contact DESE on (02) 6240 5234 or email SeasonalWorker@dese.gov.au	Worker wellbeing and welfare support may be delivered by the AE directly and/ or through their appointment of a third party. Privacy issues may prevent the worker and wellbeing officer from disclosing specific information about a worker and as such formal consent from a worker may need to be provided to facilitate a discussion.
<ul style="list-style-type: none"> - leave and entitlements - deductions - accommodation - worker pay 				

<p>SWP Approved Employer supplementary worker wellbeing and welfare support during exceptional events e.g. natural disaster events.</p>	<p>SWP Approved Employers in the first instance.</p>	<p>If AE cannot be reached: contact DESE on (02) 6240 5234 or email SeasonalWorker@dese.gov.au DESE Management will provide information to PLF. PLF will propose PLF action to DESE.</p>	<p>Support is provided subject to referral by DESE. Support will be primarily virtual in the form of general assistance including provision of information and advice on matters including repatriations as well as material support in the form of assistance with food and accommodation.</p>
<p>SWP contract management enquiries including issues relating to the SWP AE Deed of Agreement.</p>	<p>Department of Education, Skills and Employment (DESE)</p>	<p>Seasonal Worker Programme information line 02 6240 5234 or email: SeasonalWorker@dese.gov.au</p>	<p>9 am to 5 pm (AEDT) Monday – Friday</p>
<p>SWP worker support (out of hours): critical incidents</p>	<p>Pacific Labour Facility (PLF)</p>	<p>PLS Worker Welfare Hotline - 1800 51 51 31</p>	<p>Critical incidents will be referred on to Department of Education, Skills and Employment (DESE) for consideration and action outside business hours. Non-critical incidents will be referred to DESE for consideration and action during business hours.</p>
<p>PLS worker wellbeing and welfare support, including general assistance for:</p> <ul style="list-style-type: none"> - day to day support needs - health and wellbeing issues 	<p>PLS Approved Employers (AE) Participating Countries' Labour Sending Units (LSUs) and their Australian based Country Liaison Officers and/ or Consulate staff, also provide ongoing support and assistance to workers.</p>	<p>Approved Employer – HR Representative</p>	<p>If a worker is employed by a labour-hire company, the Host or direct employer (e.g. Farm) should be the first point of contact to support these needs.</p>

<p>PLS worker wellbeing and welfare support, including general monitoring and assistance for:</p> <ul style="list-style-type: none"> - health and wellbeing issues - critical incidents - exceptional events and/or issues 	Pacific Labour Facility (PLF)	PLS Worker Welfare Hotline - 1800 51 51 31 or PLS Worker Welfare Case Manager number.	All mobilised PLS workers are provided with contact details for their respective Worker Welfare Case Manager.
PLS contract management enquiries including issues relating to the SWP AE Deed of Agreement.	Pacific Labour Facility (PLF)	Pacific Labour Facility (PLF): 07 3557 7750	9 am to 5 pm (AEDT) Monday – Friday
PLS worker support (out of hours): Critical incidents	Pacific Labour Facility (PLF)	PLS Worker Welfare Hotline: - 1800 51 51 31	Non-critical incidents will be addressed during business hours.
Known or suspected breaches of Australian workplace laws.	Fair Work Ombudsman (FWO)	Fair Work Ombudsman (FWO) – phone 13 13 94	Referrals to FWO can be initiated directly by a worker or another party. Interpreter service for non-English speaking employees is provided.

Source: PLS and SWP, Pathways for accessing worker support

RSES Grievance Management

In case of employment-related grievances, the steps for RSES workers are as follows:

1. Talking to employer/team leader,
2. Involving RSE Labour Inspectors from New Zealand’s Labour Inspectorate or relationship managers under the RSES
3. Mediation through MBIE’s mediation services or independent mediators
4. Determination through the Employment Relations Authority.

In case of general wellbeing and welfare grievances, the steps for RSES workers are as follows:

- Talking to employer/team leader,
- Contacting MBIE / relationship managers.

Formal mechanisms for migrant workers to seek information or resolution to employment-related issues are outlined on [Employment NZ’s website](#) and summarized in the table below. For MBIE

services, including the Migrant Worker Hotline, RSES workers have access to interpretation services through [NZ Ezispeak](#)

Identified support need	Stakeholder responsible		Source of referral/ contact	Notes
All forms of worker exploitation	Employment Zealand	New	Labour Inspectorate 0800 20 9020	Interpreters provided for 180 languages through Ezispeak service
Immediate physical danger	Police		111	
Early Mediation <ul style="list-style-type: none"> - working arrangements, hours, pay or leave - health and safety concerns. - End of employment - Unfair treatment or bullying - concerns about your employee's performance. 	Employment Zealand	New	Early mediation through- https://earlyresolution.employment.govt.nz/	Early meditation for issues that employees feel could be resolved promptly with help from an independent resolution facilitator. Not suitable for reoccurring issue; reporting migrant exploitation; relating to personal grievance or previous mediation; case has been through courts already; reporting a wage subsidy issue
Mediation and or Settlement Service	Employment Zealand	New	Online mediation meeting (Zoom) – online application form	