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Safe and secure accommodation solutions for seasonal and vulnerable workers in regional industries

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Acronyms and abbreviations used in this report

ABS	Australian Bureau of Statistics
ACTU	Australian Council of Trade Unions
AHURI	Australian Housing and Urban Research Institute
AMRS	Augusta-Margaret River Shire
AS worker	Australian seasonal worker
BAC	Baiyungu Aboriginal Corporation
CBPA	Coral Bay Progress Association
CHP	Community housing provider
COVID-19	Coronavirus disease
DEWR	Department of Employment and Workplace Relations
DFAT	Department of Foreign Affairs and Trade
DHA	Department of Home Affairs
DITRDCA	Department of Infrastructure, Transport, Regional Development, Communications and the Arts
DPIRD	Department of Primary Industries and Regional Development (WA)
EOI	Expression of Interest
EU	European Union
FNAT	PALM workers' focus group
GDC	Gascoyne Development Commission
IDF	Infrastructure Development Fund
ILO	International Labour Organization
ILUA	Indigenous Land Use Agreement
LHP	Labour hire provider
LSU	Labour Sending Units
NGO	Non-government organisations
NSW	New South Wales
NZ	New Zealand
OECD	Organisation for Economic Co-operation and Development
PALMS	Pacific Australia Labour Mobility scheme
PBC	Prescribed Body Corporates
PDB	Pre-departure briefing
RAC	Royal Automobile Club
RDAP	Regional Development Assistance Program (WA)
SMEs	Small to medium enterprises
SWP	Seasonal Workers Program
USA	United States of America
USDA	United States Department of Agriculture
VIC	Victoria
WA	Western Australia
WAPC	West Australian Planning Commission
WHMS	Working Holiday Maker Scheme

Executive summary

Key points

- This report develops an evidence-based policy framework for accommodating seasonal and vulnerable workers in regional areas to ensure a healthy, safe and productive workforce.

- Regional Australia relies on a skilled and unskilled labour force, in part through migration schemes, to remain economically competitive. Regional workers are diverse and have diverse housing needs.

- Worker accommodation is a barrier to worker participation in regional labour markets when there are accommodation shortages. This results in workers experiencing unaffordable, low-quality, overcrowded and precarious housing.

- The most important division in accommodation provision is between employer-provided accommodation and third-party-provided accommodation. Workers in employer-provided accommodation are more vulnerable to inappropriate housing and overcharging, and less likely to raise concerns.

- Visa regulations exert a strong influence over accommodation provision and workers' behaviours and choices. While accommodation is often designed for seasonal workers, it is also occupied by long-term workers and does not meet their housing needs.

- The main barriers to innovative practices of accommodation provision are visa conditions, inappropriate accommodation standards, comprehension of accommodation standards, tight housing markets, the availability and cost of land, and construction of new supply.

- **Policy development options to address these barriers are:**

  - adjusting visa settings

  - revising and applying accommodation standards

  - raising housing literacy through regional communication hubs

  - increasing the supply of appropriate accommodation through public-private partnerships

  - planning mechanisms to secure land and encourage investment

  - collaborations with Aboriginal organisations

  - steps to improve coordination across levels of government and industries to align goal-setting and decision-making.

This research focusses on how workers in regional Australia can be better accommodated to ensure a healthy, safe and productive workforce. It provides evidence and a policy framework for state and industry stakeholders to improve and supply safe and secure accommodation for seasonal and vulnerable workers. An important contribution of this study is its recommendations for collaborations with Aboriginal organisations to deliver workers' accommodation.

There is a high demand in regional and rural Australia for both skilled and unskilled labour. Migration policy encourages skilled and unskilled migration to these areas through a lower threshold for skilled labour, unskilled labour, and settling refugees in regional locations.

Changes in regional housing markets have greatly increased the cost of accommodation and lessened its availability. A lack of affordable and available housing places seasonal workers in precarious, expensive and inappropriate housing, and makes it difficult for businesses to recruit or attract workers to non-metropolitan regions.

Key findings

The workers addressed in this study are some of the most vulnerable in Australia. A determining characteristic of this workforce is that they provide disposable, inexpensive and often foreign labour. This temporary and replaceable characterisation underlies an assumption in industry practices and policy outcomes that sub-par is good enough.

Our findings demonstrate the dire circumstances facing these groups of workers, many of whom live in crowded accommodation and lack the knowledge and power to raise complaints or advocate for improvements.

This situation is untenable for all levels of government, as well as unions, advocacy organisations and local communities. It also causes foreign-relations issues for Australia with neighbouring countries. The primary driver of change will need to be a strong commitment to policy change across government, industry and advocacy organisations under the leadership of the federal government.

Who are 'seasonal and vulnerable workers'?

Our term 'seasonal and vulnerable workers' is structured through two axes:

1. visas

2. length of stay—whether workers are short-term, or stay for over 12 months (are semi-permanent).

As set out below, visa provisions differ greatly between Pacific Australia Labour Mobility scheme (PALMS) migrant workers and Working Holiday Maker Scheme (WHMS) workers. Australian Seasonal (AS) workers are not restricted by visa conditions, however they face many similar accommodation challenges.

PALM workers[1] are required by their visa conditions to remain with a single employer in regional locations. Employers of PALM workers must provide them with accommodation according to guidelines issued by the Department of Employment and Workplace Relations (DEWR).

WHMS workers must be under 35 years old and are incentivised to stay for a period of three to six months in regional locations to extend their visa.

AS workers are not restricted by visa conditions. They tend to be under 35, or older Australians on working holidays.

Undocumented workers are another type of worker, but are not addressed in this study. They are people who are working without a visa, or in contravention of their visa.

The second axis for considering seasonal and vulnerable workers—their short-term/semi-permanent status—affects PALM workers, AS workers and longer-term migrant workers. This is because accommodation requirements and workers' expectations for their accommodation change when they stay for extended periods (such as PALM workers, who can stay in Australia for up to four years).

Hence this report addresses both seasonal workers and longer-term workers who are vulnerable to precarious housing because of visa conditions or housing markets.

Provision of worker accommodation

The most important division in the provision of worker accommodation is between employer-provided accommodation and third-party-provided accommodation.

Employer-provided accommodation occurs when there are obligations on employers (such as the PALMS), or when there is no other accommodation available and employers are forced to provide accommodation to be able to access the workforce they require.

Workers in employer-provided accommodation are most vulnerable to very expensive and often inappropriate housing. However, they are least likely to raise their concerns due to the absence of housing choice, their need for employment, and/or their lack of knowledge about how to raise a grievance.

Contemporary practices to provide accommodation for seasonal and vulnerable workers are diverse in accommodation type, cost and quality. There is a notable reliance on temporary and informal housing, such as shipping containers, caravans and demountable buildings. Even when staying in permanent accommodation, such as detached housing, temporary measures such as bunk beds and adults sharing rooms are likely.

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1   While the acronym for the Pacific Australia Labour Mobility scheme is 'PALMS', we refer to workers under the scheme as 'PALM workers' as this is the more common expression.

Workers' experiences of accommodation

The main influence on workers' experiences of accommodation are visa conditions and the extent to which they are able to arrange accommodation provision themselves rather than having to use employer-provided accommodation.

There are similarities among workers in regional industries. They prize affordability and value for money, want private space and some control over their space, and they value socialising and want good relationships with the local community.

We found that PALM workers had a stronger focus on saving and remittances, needed private space to communicate with family, and valued people around them who were good housemates. PALM workers often socialised through churches and community organisations.

This contrasted with WHMS workers and younger AS workers, who were seeking to socialise with each other, were less concerned about private space, and were saving money for their travels.

PALM workers often had poorer housing outcomes due to their reliance on their employer. Language and cultural differences were also factors. The Employer Guidelines for accommodation result in rents at above-market rates and crowded accommodation—including shared bedrooms, ablution and kitchen facilities.

There were concerns about discrimination towards migrant workers when they apply for private rental properties, but there was also violence toward WHMS workers' vans parked overnight in public areas.

Accommodation plays a large role in shaping the labour-market choices of WHMS, AS workers and semi-permanent workers. WHMS and AS workers will avoid regions or leave if their accommodation is substandard. When semi-permanent workers are pushed towards precarious housing, they will avoid the region, or require their employers to subsidise their accommodation or pay a higher wage.

PALM workers however have less agency to avoid employers or regions.

Barriers to innovative practices

This research identified six barriers to innovative practices to safe and secure accommodation for seasonal and vulnerable workers.

1. PALMS visa conditions that prevent workers from changing employers.

2. The standards that currently apply to worker accommodation. Particularly concerning is how PALMS Employer Guidelines have led to expensive accommodation that is poor value for money. Existing regulations pose risks for both worker health and for regional housing markets. They are also inappropriate for workers who spend many years working in regional industries.

3. Workers lack comprehension of standards; they are unaware of both their rights and how to advocate for improved housing.

4. Tight rental markets affect the supply of housing. In two case-study locations, short-stay holiday rental accommodation had reduced the rental housing stock and there was underutilised ageing building stock (including hotels).

5. The main barriers to new workers' accommodation are the availability and cost of land, and construction and investment returns.

6. Native title can be perceived as a constraint to be negotiated around; this limits engagement with Aboriginal organisations.

Policy development options

Our recommendations for policy changes needed to support innovative practice solutions to address worker accommodation pressures in regional Australia respond to the six barriers that were identified in this research.

Adjusting PALMS visa conditions

Our findings recommend adjusting PALMS visa settings with respect to conditions and Employer Guidelines.

Simple and efficient processes should be established so PALM workers can change employers once initial costs have been paid off. Given the higher risks of exploitation, there should be regular accommodation inspections and access to a cultural mediator when required to support advocacy. PALM workers should be provided contact information for supporting organisations and simple accommodation checklists in their own language so they know the minimum standards.

Worker accommodation standards

The PALMS accommodation provisions should have separate standards for seasonal workers, and for workers who stay over 12 months.

Safe Work Australia should develop a model code for employer-provided accommodation that sets a minimum standard, to be legislated by state governments. Local councils should be directed by state governments to apply existing regulations applying to lodging houses (WA), rooming houses (Victoria) or boarding houses (NSW) to worker accommodation. This would improve standards and address hazards—in particular, fire risks.

Literacy about housing

All regional workers would benefit from information that increases their housing literacy; this could include the compulsory provision of information about the standards that apply to their housing and how to advocate to have issues addressed.

Regional communications hubs could improve matching of supply and demand, and provide accurate information on work and accommodation options—including contact details, timelines and rules or codes of conduct on camping and behaviour.

Increase availability of existing accommodation

State governments are well placed to support increases in the availability of existing accommodation.

In regions with high demand for rental accommodation, requiring registration of all short-term rentals and of development approvals for short-term rentals that exceed an annual cap would provide an important dataset. This would assist governments to understand and regulate the impact of short-term rentals on residential housing.

A vacant residential land tax (such as that used in Victoria) would encourage existing residential accommodation to enter the rental market.

At the municipal level, housing advocates could also facilitate private homeowners subletting rooms or studios to PALM workers.

Supply new regional worker accommodation

To address the cost of developing a supply of new regional worker accommodation, and to encourage collaboration between businesses to achieve superior outcomes, public-private partnerships are likely to be required.

Public programs should encourage multi-business accommodation facilities. This is because they reduce costs and risks, are more accessible for small and medium enterprises (SMEs), and fit well with the priorities of government housing programs.

There is also a need to analyse and provide information on a range of special purpose vehicles for providing multi-business facilities. Such models must bring private investment, be appropriate for government support, and provide pathways for SMEs to secure worker accommodation. Business cooperatives were identified as a promising vehicle.

Planning for worker accommodation

State and local planning could encourage investment through planning schemes and special control areas to designate land for worker accommodation. Planning requirements for larger new tourism developments to include workers' accommodation could also be considered.

A less expensive, and short-term to medium-term solution, would be to establish 'workers' parks' where seasonal workers with their own accommodation could stay.

Collaborations with Aboriginal organisations

Collaborations with Aboriginal organisations to develop worker accommodation present opportunities for achieving mutual goals—if there is sufficient public investment and a clear approach to risk mitigation.

Traditional Owners' responsibilities and relationships need to be properly considered in discussions, planning and negotiations with Aboriginal organisations.

Aboriginal organisations require independent legal and financial advice and human-resource capacity building to mitigate the risks of uninformed decision-making. The relationship between Traditional Owners, Aboriginal organisations and state agencies is crucial—and needs to be managed well.

Coordinated investment in worker accommodation

There is currently little coordination in Australia with respect to worker accommodation between industry, government, accommodation providers and non-government organisations (NGOs).

Despite competing for the same workforce, and exhibiting many similarities in their industries and working visa programs, Australia is behind New Zealand in its coordination and capacity to work with industries to generate investment in workers' accommodation. A next step towards coordination would be to define a shared set of values and standards for workers' accommodation in regional industries across different levels of government and stakeholders. This important collaborative and investigatory work could guide stakeholders as they seek to:

• influence accommodation investment and outcomes

• avoid overreach

• build a stronger, healthier and safer regional workforce.

The study

This project seeks to answer the following research questions:

1. What are the contemporary practices used to provide accommodation to seasonal and vulnerable workers in regional Australia? What are unintended and unwanted consequences of these practices?

2. What are the accommodation experiences of seasonal and vulnerable workers in regional Australia and how do they shape their labour market choices?

3. What are the barriers to innovative practices to providing healthy and safe accommodation for these workers in regional Australia and comparable international locations?

4. What policy changes are needed to support innovative practice solutions to address seasonal and vulnerable worker accommodation pressures in regional Australia?

The project uses a mixed-methods comparative case-study approach with five case studies across seven locations:

*   Margaret River Region and Coral Bay in Western Australia

*   two Victorian regional centres

*   mobile agricultural workers in New South Wales working across Coffs Harbour, Clarence Valley and Richmond Valley.

Coral Bay provided an opportunity to investigate Aboriginal organisations' engagement in providing workers' accommodation through the experience of co-author Paul Baron (Chapter 6).

There were two stages to the case study:

*   Stage 1: a literature review, field research, 33 interviews with industry stakeholders and 39 participants in interviews and workshops with workers, June and December 2024.

*   Stage 2: focus groups where we presented findings and recommendations to 38 stakeholders across the case-study locations, and facilitated an exercise to rank and discuss policy responses, January to March 2025.

Overall, there were 92 participants in our study, including interviews with state and federal officers and three international experts. All interviews, workshops and focus groups were transcribed and thematically coded for analysis using NVivo.

1. Introduction

- Regional Australia relies on a skilled and unskilled labour force to remain economically competitive. This is partly done through migration schemes. Seasonal and vulnerable workers require safe and secure accommodation for their wellbeing, and for regional industries to attract and retain a workforce.

- Worker accommodation is a barrier to regional worker participation in regional labour markets, as workers compete with long-term residents and tourists for housing. This results in workers being forced into expensive, low-quality, overcrowded and precarious housing.

- This research examines how seasonal and vulnerable workers in Australia can be better accommodated to ensure a healthy, safe and productive workforce in regional areas.

- This report is based on a case-study approach across Western Australia, New South Wales and Victoria. It investigates the contemporary practices of providing accommodation to agricultural and tourism workers in regional areas.

- We employ a qualitative methodology to analyse the experiences of workers and to find barriers to accommodation delivery. This approach produces an evidence-base for policy-relevant solutions.

Regional and rural Australia has a high demand for both skilled and unskilled migrants.

Labour supply and working conditions have been issues in Australia since its colonisation from the late eighteenth century. The colonists' need to secure land and labour brought them into conflict with Aboriginal and Torres Strait Islander groups who had exercised their own systems of land ownership and management for at least 50,000 years.[2] Aboriginal people were exploited for their labour—particularly in pastoral work.

However, following the end of convict migration between 1850 (NSW) and 1868 (WA), there was a huge demand for low-wage labour. A number of schemes brought indentured labour to Australia, including Chinese and Indian indentured labour, and the blackbirding schemes (1847–1904) where Pacific Islanders were, in many cases, kidnapped and subjected to involuntary labour in Queensland (Petrou and Connell 2022). This history continues to create regional tensions for Australia, and has ensured an ongoing focus on unskilled migrant labour schemes from Australia's Pacific neighbours. These workers are also labelled 'guestworkers' or 'migrant labour scheme workers'.[3]

Migration policy encourages workers to regional areas through a lower threshold for skilled labour and unskilled labour, and policies related to settling refugees in regional locations (Boese and Moran 2021). The rationale for regional migration is primarily economic, and is designed to create a flexible labour supply in regional Australian towns.

However, changes in regional housing markets have greatly increased the cost of accommodation and lowered its availability. In many coastal locations, seasonal workers are competing with long-term residents and tourists (Gurran et al. 2025). The subsequent lack of affordable and available housing makes it difficult to recruit or attract workers to non-metropolitan regions (Department of Infrastructure, Transport, Regional Development, Communications and the Arts [DITRDCA] 2024).

1.1 The importance of regional worker accommodation

This research was conducted because housing has long been identified as a significant barrier to regional worker participation in non-metropolitan labour markets—both internationally and domestically (Beer et al. 2011; Hodge et al. 2002).

Regional workers in the agriculture and tourism sectors have found themselves competing for housing alongside long-term residents or tourists, or reliant on employers to provide accommodation. Increased pressure on existing housing markets in the regions results in pressure on the availability and affordability of housing (Duncan et al. 2019). These are driven—in tourism areas in particular—by a drop in available rental accommodation and an increase in demand (Buckland et al. 2023; Verdouw et al. 2021). The impact of local planning on new housing supply highlights opportunities to shape how new housing is planned and delivered (Crommelin et al. 2022), including opportunities for inclusionary planning mechanisms (Gurran et al. 2018). Even where employers of migrant labour scheme workers are required to provide accommodation, affordability and quality housing are not guaranteed. Employee experiences of high rents, substandard conditions and overcrowding have been widely reported (Bailey 2018; Barry 2021; Faleolo 2019; Petrou and Connell 2022).

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2   See Veth, P., Ditchfield, K., Bateman, M., Ouzman, S., Benoit, M., Motta, A. P., Lewis, D., Harper, S. and Corporation, B. A. (2019) 'Minjiwarra: archaeological evidence of human occupation of Australia's northern Kimberley by 50,000 BP', *Australian Archaeology*, vol. 85, no. 2: 115–125 for evidence of occupation; and Hunter, A. (2012) *A different kind of 'subject': colonial law in Aboriginal-European relations in nineteenth century Western Australia 1829-61*, Australian Scholarly Publishing, Melbourne, for how Europeans displaced Aboriginal law and land ownership in the Swan River Colony in West Australia.

3   Many publications, including this one, prefer not to use the term *guestworkers* due to the connotation that these workers are treated like guests when their pay, working and living conditions tend to be set at a low standard for the country where they are working.

Recent research (Bailey 2018; Deloitte 2022; Howe et al. 2019) indicates that seasonal workforce accommodation shortages prevent businesses from operating at full capacity. There are few assessments of viable solutions. There is a need for a comprehensive consideration of barriers within planning and visa regulations, and strategies to address them.

Responses to accommodation issues for seasonal and vulnerable workers are an element of broader projects regarding these groups, and focus largely on setting and enforcing standards (Barry 2021; Petrou and Connell 2022). Case studies have tended to point out the failure of employers and housing providers to achieve standards, rather than the pursuit of solutions at sub-national levels. There is an opportunity to make a research contribution by seeking solutions at a variety of levels—including municipal or regional levels—to providing safe and secure accommodation for seasonal and vulnerable workers in the agricultural and tourism-focussed regions of Australia.

Issues associated with accommodation experienced by seasonal and vulnerable workers has emerged in recent literature (Bailey 2018; Barry 2021; Deloitte 2022; Perry 2018). Specific studies on regional worker accommodation argue that it is a major issue that is not addressed well (Bailey 2018; Deloitte 2022; Perry 2018). Due to a focus on cost, and power imbalances between accommodation providers and workers, worker accommodation is often not designed *'as spaces where workers are meant to gather, socialise, or otherwise live out a dignified life'* (Perry 2018).

Accommodation can play an important role in restricting movement and constraining choices, as workers whose accommodation is tied to their work are not willing to put their employment or accommodation at risk. Accommodation providers for international backpackers regularly act as surrogate migration agents (Barry 2021). A Deloitte report concludes that accommodation providers hold *'significant influence'* (Deloitte 2022) in the supply chain and can set prices, and there is agreement that accommodation is overcrowded, substandard and the prices are set too high. Four recent reports concur that rates and conditions are highly variable (Bailey 2018; Deloitte 2022; Howe et al. 2019; International Labour Organization 2022).

Furthermore, both backpackers and migrant labour scheme workers are subject to racial profiling and segregation (Bailey 2018; Barry 2021; Perry 2018; Petrou and Connell 2022). For instance, when questioned about cramped rooms, racial stereotypes of migrant labour scheme workers were used to justify these conditions as being like 'in the Pacific' (Bailey 2018). Seasonal work can also be gendered through:

- the separation of male and female workers in shared living quarters
- the hierarchies that develop in these spaces
- the experiences of stigmas and sexual harassment (Barry 2021; Perry 2018).

Less is known about undocumented seasonal workers who:

- are in situations that are even more precarious
- have complete dependence on contractors for work and housing
- are reportedly widespread in agriculture (Brickenstein 2015; Deloitte 2022; Howe et al. 2019).

The recent literature has made a range of recommendations to improve the conditions for workers in regional industries. These include:

- a single national standard for accommodation for the horticulture industry (Deloitte 2022)
- a long-term strategy based on mechanisation and developing local skilled labour and reliable international labour, rather than pursuing the current fractured approach to horticultural labour (Howe et al. 2019)
- that Australia and New Zealand should improve enforcement of accommodation and work standards for migrant labour scheme workers (International Labour Organization report [ILO] 2022).

Recent research points to the importance of understanding migrants' perspectives and experiences, and the broader relationships they hope to establish in order to generate a range of long-term benefits for both regional locations and migrants (Boese and Moran 2021; Petrou and Connell 2019).

1.2 From seasonal workers to seasonal and vulnerable workers

This project initially focussed on seasonal workers employed in agricultural or tourism. These seasonal workers offer a temporary labour force where local work forces are not sufficient (Hanson and Bell 2007). For over half a century, the mobility of the seasonal workforce has supported the operation of agricultural businesses and the economic competitiveness of the regions (Hanson and Bell 2007).

It was therefore expected that the non-permanent labour force, employed in seasonally based roles, would migrate to a region during peak seasons before moving to the next employment opportunity in another region once the season is over.

It soon became evident that a narrow focus on seasonal worker accommodation would not be appropriate. This is primarily because those employed on a short-term basis in what could be described 'seasonal roles', were remaining in the same region for over 12 months. This occurred particularly under the Pacific Australia Labour Mobility scheme (PALMS), although some backpackers and Australian workers also followed a similar trend.

Four distinct groups of seasonal and vulnerable workers emerged from the research as likely to be employed in low-level hospitality and agricultural roles in regional Australia:

1. Working Holiday Makers (WHMS workers, often called 'backpackers') on Working Holiday Maker visas

2. Workers on the Pacific Australia Labour Mobility scheme (PALM workers)

3. Australian seasonal workers (AS workers) who are permanent residents or citizens of Australia employed in short-term contracts in traditionally seasonal roles

4. Undocumented workers who are working in contravention of their visa conditions or without a visa.

This research also intersects with a fifth group: semi-permanent workers who are in managerial and skilled roles who are Australian, permanent residents or on longer-term visas. We treat this as a separate group that occasionally enters this study, as they only intersect with precarious housing in regional locations where there is a severe shortage of residential housing. As a group with greater agency, resources and choices, they generally choose to avoid locations with severe housing shortages. This can be compared with workers in the other four categories, who are generally in precarious housing. The intersection of this group with precarious housing is likely to increase due to the trends in regional housing markets discussed in subsection 1.3.2.

This research is focussed on the experiences and housing outcomes of WHMS workers, AS workers and PALM workers. We do not include undocumented workers in our research as the risks of deportation or criminal charges outweighed the benefits they would accrue from their participation.[4] As shown in Table 1, the characteristics of seasonal and vulnerable workers are influenced by:

- the relationship between the employer and employee

- the extent to which the employer is involved in the provision of accommodation

- the type of visa on which the worker entered Australia.

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4   This was a decision made during our research-design discussion and human research ethics application process. Chapter 4.6 from the National Statement on Ethical Conduct in Human Research National Health and Medical Research Council, Australian Research Council and Universities Australia (2023) National Statement on Ethical Conduct in Human Research, National Health and Medical Research Council, Canberra, guided us to make this determination, with the additional consideration that researchers could be compelled to reveal information on illegal activities by the courts or our employers.

Table 1: Characteristics of regional worker groups

Regional worker group	AS worker	WHMS worker	PALM worker
Type of visa	none	Subclass 417 or 462	Subclass 403
Employment access	Self-organised through platforms such as Seek, Gumtree, Facebook or word-of-mouth	Self-organised through platforms such as Seek, Gumtree, Facebook or word-of-mouth	Employer or labour agent
Relationship between employee and employer	Free to change employer	Influenced by visa conditions but relatively autonomous	Tied to employer, including labour-hire firms
Industries	Can work in any industry	Can work in any industry: visa extensions require certain industries	Limited by visa requirements
Accommodation provider	Sources own	Sources own	Organised by employer
Accommodation types	Caravan parks, houses, hostels, informal accommodation (van, camping)	Caravan parks, houses, hostels, informal accommodation (van, camping etc.)	Caravan parks, student accommodation, houses (private and employer-provided), hostels/motels
Age	Under 35s, and older retired travellers	18–30 years (or up to 35 years for participants from some countries) linked to visa	Aged over 21 years, linked to visa
Mobility	Mobile, but often settled in place for longer periods	Mobile, but often settled in place for longer periods	Mobility tethered to employment

Source: Authors

WHMS workers

Under the Working Holiday Maker Program, eligible WHMS workers can work for up to 12 months on a subclass 417 (Working Holiday visa), or subclass 462 (Work and Holiday visa). The two visa streams offer almost identical working conditions in Australia, including:

- Employment length restrictions (maximum six months with a single employer)
- A maximum of four months study in each 12 month visa period
- Regional work requirements for visa extension beyond 12 months

The subclass 417 and subclass 462 streams are available to citizens of different countries, with some overlap. Unlike the subclass 417, the subclass 462 also includes education and English language requirements. Given these factors, WHMS workers are aged between 18 and 30 years (or up to 35 years for participants from some countries).

The work undertaken by WHMS workers is defined by their visa and includes agriculture and tourism employment, notably in regional Australia. To extend their visa, workers need to undertake three months of eligible regional work. While the industry in which they work is influenced by their visa, WHMS workers can choose or change their employer (Barry 2021). The jobs typically undertaken by WHMS workers are skilled or semi-skilled, casual and low-paid (Barry 2021; Iaquinto 2018).

WHMS workers live in a variety of dwellings, from houses to apartments, units or townhouses, in vans, hostels, motels or caravan parks (Barry 2021; Iaquinto 2018; Kossen et al. 2021). While WHMS workers are highly mobile, they have been found to settle in place for longer than the three months necessary to secure visa extensions.

At the end of February 2025, there were 181,193 WHMS workers on 417 visas working in Australia (Department of Home Affairs [DHA] 2025). These workers contribute to the community in multiple ways, including to the local economy through their spending patterns as well as the economic competitiveness brought about by their employment and participation in agricultural and tourism industries.

AS workers

The characteristics of AS workers are similar to those of WHMS workers. However, as Australian citizens they are not constrained by visa conditions to specific industries or–regional locations. AS workers use similar processes as WHMS workers to procure work, and do similar work. AS workers often stay in the same types of accommodation as WHMS workers, either sourcing their own or staying in their own caravan or mobile home (Barry 2021).

However, there are three distinctions between WHMS and AS workers:

1. WHMS workers are likely to have less developed English-language skills, social networks and familiarity with Australia and Australians.

2. WHMS workers are more likely to leave a regional job after completing their 88 days of work to extend their visa, whereas AS workers are not compelled by visa conditions to leave a job or to travel.

3. AS workers also include older Australians who are undertaking working holidays while travelling around Australia.

PALM workers

PALM workers enter Australia on a subclass 403 visa and must be aged over 21 years, and have a median age of around 30 years (International Labour Organization 2022). PALM workers' access to employment is directly through their employer, or via a labour agent. The industries in which they can work are prescribed by their visa and include agricultural and tourism industries. Roles undertaken are typically unskilled, low-skilled or semi-skilled, contracted, and are generally low-paid (DHA 2024b; International Labour Organization 2022).

PALM workers' accommodation is organised by their employer as a condition of the PALM scheme. The accommodation used by PALM workers—at least initially, and always for most workers—is provided by their employer. 'Employer' here refers to either a labour-hire firm, or a direct employer who arranges their visa and their obligations are in the *Pacific Australia Labour Mobility Scheme Approved Employer Guidelines* (DEWR 2023b). The economic importance of the PALM scheme for Australia, particularly in the regions, is well documented (Gibson et al. 2014; Shilito 2022; Wallis 2023).

Our research also identified that non–PALM workers who stay for 12 months or more—that is, are semi-permanent—can also be housed in precarious accommodation. These workers are either Australian or permanent residents in our study, but could potentially be on other longer-term temporary visas. This group is drawn into precarious housing when the housing market does not provide adequate housing, and can include skilled and managerial-level workers.

As these workers and long-term PALM workers are not seasonal workers, we call them vulnerable workers. We use the term 'vulnerable' because these workers:

- are vulnerable to precarious housing

- are vulnerable in their reliance on their employers for housing.

The emphasis of the research remained focussed on safe and secure housing outcomes, but now addresses housing for seasonal and vulnerable workers. As described by Faulkner et al. (2023), precarious housing is any situation that places the people living there at risk of homelessness or in a scenario that may impact on their health and wellbeing. Most typically, those in precarious housing would be in the private rental sector, where rents can be unaffordable and housing of low quality (Faulkner et al. 2023). However, here we extend the definition of precarious housing to include housing provided by an employer or linked to employment that is inappropriate for the needs of occupants to an extent that it may impact on their health and wellbeing.

1.3 Policy context

1.3.1 Australia's migration program

The Australian migration policy is a key structural component of the regional labour force. In 2022, a third of Australian workers were born overseas, and 7 per cent held a temporary visa, such as a working holiday maker (Mackey et al. 2022). There is a long-term trend in regional population growth towards a greater concentration in regional cities and coastal areas (Han et al. 2025).

Australia's regional population grew by 117,300 or 1.4 percent in 2022–23 (Australian Bureau of Statistics [ABS] 2022–23) although this is a much slower growth rate than urban areas. Net overseas migration is the largest component of regional population growth: 63 per cent in 2023 in areas outside greater metropolitan regions, compared to 22 per cent for internal migration. However, this is still a much smaller proportion than in greater capital cities (88% in 2023). There are two key programs that provide unskilled or semi-skilled labour to regional Australia:

- the Working Holiday Maker Scheme—WHMS workers, colloquially called 'backpackers', although this phrasing also includes Australians
- the Pacific Australia Labour Mobility Scheme workers—PALM workers, who fit into the international category of 'guestworkers'.

For a summary of the relevant visa categories and regulations, see Table 2.

Working Holiday Maker schemes (WHMS)

The first working holiday program was introduced in Australia in 1975. It was only available to British nationals aged 18–26, and was subsequently expanded to 29 countries.

At present, the key visa conditions are that applicants:
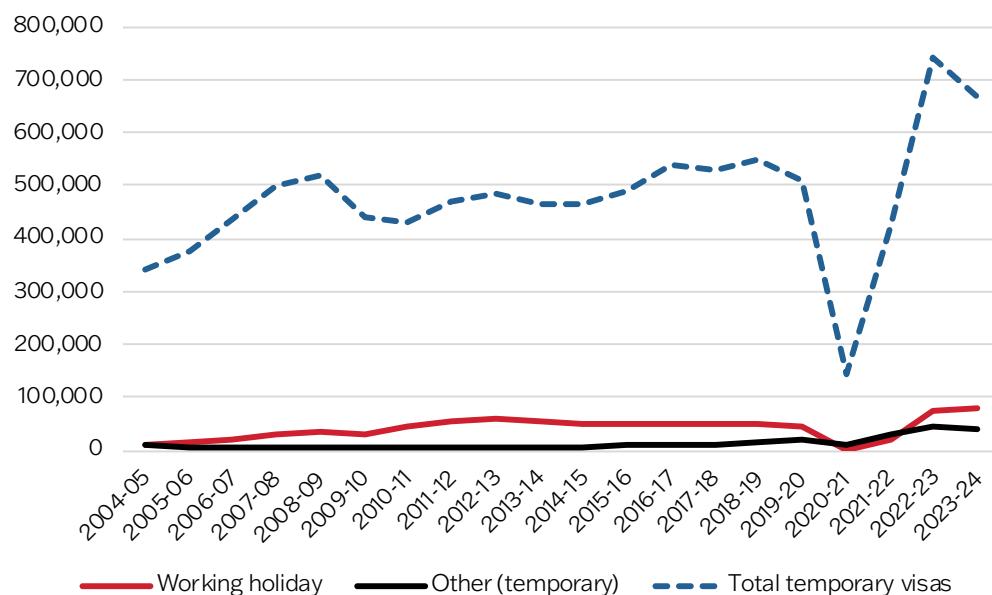
- must be aged 18–30 years (or up to 35 years for participants from some countries)
- can only work for up to six months for the same employer unless the Department of Home Affairs (DHA) grants special leave
- can have their visa extended for a second year if they undertake 88 days of work in regional and remote Australia in specified industries
- can have their visa extended for a third year if they undertake 179 days of work in the preceding two years.

The specified industries for WHMS workers are tourism and hospitality, agriculture, fishing, mining, construction and disaster recovery work.

The visa-extension conditions drive the regional migration of WHMS workers (Mackey et al. 2022). Over time, the origin of WHMS workers has shifted from the United Kingdom to other nations including Japan, Ireland, Germany, France, Italy and South Korea. They are tied to a longer-term international trend in filling low-skilled labour positions in agriculture and hospitality with flexible workers through multinational agreements (Tan and Lester 2011). The 2024 *Australian Migration Strategy* noted the need to better target *'the Working Holiday Program to support Australia's regions and its workers'* (DHA 2023:13).

The Australian Working Holiday Maker Program is the largest in the OECD ([Organisation for Economic Co-operation and Development] Mackey et al. 2022). The annual number of WHMS arrivals was consistently between 50,000 and 60,000 between 2011–12 and 2018–19, before decreasing to 1,020 in 2020–21 due to the COVID-19 pandemic then increasing to 79,600 in 2023–24 (ABS 2023–24). The total number of WHMS workers in Australia on 20 June 2024 was 173,216 (DHA 2024a).

Figure 1: Selected visa arrivals by type and financial year, 2004–05 to 2023–24

Source: Australian Bureau of Statistics (2023–24)

Notes: 'Other' visas primarily belong to migrant labour scheme workers. The total number of temporary visas includes student visas (282,000 in 2022–23).

Pacific Australia Labour Mobility scheme (PALMS)

Pacific migrant workers access employment in Australia through a serious of labour-related migration schemes that began with the Pacific Seasonal Worker Pilot Scheme (PSWPS) in 2009 and the Seasonal Workers Program (SWP) scheme from 2012.

These schemes had the goals of:

- building stronger links with Pacific nations
- contributing to development (through remittances and training)
- meeting a demand for regional labour (Petrou and Connell 2023).

Workers in the SWP were restricted to six-month to nine-month contracts within 12 months. The Pacific Labour Scheme began in 2018 and allowed for contracts for initially up to three years (since extended to four years), and new industries including aged care, tourism and hospitality. The SWP and the Pacific Labour Scheme were consolidated under the Pacific Australia Labour Mobility scheme (PALMS) in 2022.

These workers are highly regulated due to the provisions of the PALMS. As previously mentioned, they cannot change their employer while in Australia. There are also provisions that aim to prevent exploitation of workers in the *Pacific Australia Labour Mobility scheme Approved Employer Guidelines*, which also sets our mandatory requirements in relation to accommodation for workers (DEWR 2023b).

The guidelines were updated in November 2024, and require employers to provide *'affordable and safe accommodation that is reasonably close to the Workers' site'* unless the worker stipulates that they would like to organise their own accommodation. The cost of accommodation must be *'comparable to the local market'* and shared equally among all tenants. As the accommodation costs are deducted from an employee's wages, all costs, including utilities, must be documented and submitted to the Department of Employment and Workplace Relations (DEWR) for approval in the Accommodation Plan. Any accommodation provided to workers must be safe and secure and fit for occupancy; it must also be of appropriate quality, and comply with the PALMS and state, territory or local government legislation. (The guidelines include a list of minimum standards, which will be discussed further in Chapter 4.)

The SWP contracted during COVID-19, then expanded rapidly due to:

- the sudden reduction in WHMS workers

- the low levels of COVID-19 in Pacific countries

- the greater control the Australian Government could exert over PALM worker movements to and within Australia (Petrou and Connell 2023; Stead and Petrou 2023).

These trends can be seen in the final column of Table 2. WHMS and PALM workers are linked through their participation in the same labour market for low-paid regional work.

In December 2024, a total of 27,260 PALM workers were employed in Australia. Of these:

- 15,265 were employed in agriculture roles

- 9,745 were employed in meat processing

- 455 were employed in other industries—which may include tourism (DEWR 2024).

PALM workers are also working in accommodation provision (2.5%) and health and social care (1.8%).

In terms of location, the majority of PALM workers were employed in Queensland (8,475 workers), followed by New South Wales (5,130 workers) and Victoria (5,105 workers) (DEWR 2024). The majority had arrived in Australia from Vanuatu, Timor-Leste and Fiji (DEWR 2024).

The long-term trend is away from short-term PALM workers and toward long-term PALM workers—of whom there were over 16,000 in most months in 2024. When combined with the numbers of WHMS workers, there is now a greater number of low-wage migrant workers in Australia than ever before.

Table 2: Eligibility and key regulations of Australian visa programs that support regional labour forces

Visa type	Eligibility criteria	Length of stay	Approved activities	Approved industries for specified work in regional Australia
Working holiday maker program visa (subclass 417)	Aged 18–30 years First holiday in Australia and working to fund the trip Passport from an eligible country	12 months	Undertake short-term work Study for up to 4 months Do 3 months of specified work to be eligible for a second working holiday visa	Regional Australia: plant and animal cultivation; fishing and pearling; tree farming and felling; mining; construction. Remote and very remote Australia: tourism and hospitality (from June 2021)
Working holiday maker program visa (subclass 462)	Aged 18–30 years First holiday in Australia and working to fund the trip Passport from an eligible country Have completed 3 months of specified subclass 417 work	12 months	Undertake short-term work Study for up to 4 months Undertake 3 additional months of specified work to be eligible for a third visa	Work of any kind—however, a visa holder can only stay with the same employer for 6 months
Pacific Australia Labour Mobility visa (subclass 403)	Aged over 21 years Hold a valid passport and be work-fit, have no criminal record, and be of good character, have a sponsor, meet the skills and qualification needs of the employer, intend to return to their country at the end of their visa	9 months (short-term contract) up to 4 years (long-term contract	Work for a temporary activities PALM-scheme-approved sponsor	Aged care, aquaculture, agriculture and related food processing, tourism and hospitality sectors

Sources: https://immi.homeaffairs.gov.au/visas/getting-a-visa/visa-listing/work-holiday-417/specified-work; https://immi.homeaffairs.gov.au/visas/getting-a-visa/visa-listing/work-holiday-417/first-working-holiday-417; https://immi.homeaffairs.gov.au/visas/getting-a-visa/visa-listing/temporary-work-403/pacific-australia-labour-mobility-stream#Eligibility.

1.3.2 Migration and regional housing markets

Australia's migration strategy is underpinned by goals to boost productivity and build a skilled workforce to support the growth of key industries nationally—for example, tourism—including in regional Australia (DHA 2023). A successful migration strategy is described as one that *'ensures the right skills get to the right places'* (DHA 2023: 11). One factor that supports the success of a migration strategy is housing and accommodation for migrants (DHA 2023). Similarly, housing is described as being fundamental to the economic growth of regional Australia (DHA 2023).

While an increase in regional workers has a positive impact for the economy and local businesses, population change can have negative implications for local housing markets. Migration (international and domestic) and the subsequent increases in demand for accommodation impacts the prices and rents of housing markets (Yanotti et al. 2024), especially in regional areas (Beer et al. 2011).

There is recognition that regional Australia is experiencing a shortage of affordable, available, diverse, quality housing (DHA 2024b; Reynolds et al. 2024). These existing conditions, particularly affordability, were worsened by the increased demand for housing as households moved away from the cities during the COVID-19 pandemic (Gurran and Shrestha 2024). Moreover, tourist activities can affect the rents and prices of local housing markets, which are potentially exacerbated by the loss of long-term rental stock to the tourist market (Gurran and Phibbs 2017).

A supply of affordable housing appropriate to the needs of regional workers is recognised as a key support to the growth of regional Australia (Department of Infrastructure 2024). A lack of available, affordable housing for regional workers results in:

- jobs being left vacant
- subsequent skills shortages in the community (Buckle et al. 2024).

The unique challenges to increasing the supply of housing in regional Australia are longstanding. They include a combination of:

- land supply—constrained at times by Crown Land and native title requirements
- construction cost
- shortages of builders and associated skills (Beer et al. 2011; Buckle et al. 2024).

The Australian *Migration Strategy* notes that infrastructure, such as housing, is typically delivered by the state, regional or local government, while also recognising the disconnect between the migration system and planning for regional development—including housing (DHA 2023). However, any changes to migration policy that may shift the population to non-metropolitan regions needs to take into account the needs of the those regions (Buckle et al. 2024; DHA 2024b).

1.3.3 Policies and programs for regional worker accommodation

Federal and state governments have turned their attention to the issue of housing due to rising costs and rents across metropolitan and non-metropolitan markets and sectors. Over the last three years, the Albanese Labor government has delivered a range of housing measures:

- Housing Australia—which has the potential to deliver new social and affordable homes
- Home Guarantee Scheme—which supports access to home ownership
- Regional First Home Buyer Guarantee—which is of the most relevance to this project (Australian Government 2018).

In addition, a range of programs has been introduced at state and regional levels to increase the availability of worker accommodation (see examples in Table 3). Many of these examples are recent and their outcomes are not yet ready for assessment. The programs typically focus on increasing supply by working with local governments and, to an extent, incentivising new private investment into a region or removing barriers associated with infrastructure delivery. There is a trend across all states reviewed towards local government playing a growing role in the provision of regional worker accommodation—although our interviews suggested there is resistance in local government to expanding its role.

Large-scale funding programs in Victoria and New South Wales also include affordability criteria. For example, in Victoria's 2023 *Regional Worker Accommodation Fund*, which offers the most funding ($150 million), increases in supply targets are set alongside affordability goals for regional workers (see Table 3). The program is designed to fund housing as well as the infrastructure that supports the delivery of housing. It brings together industry, local government and community groups to respond to local needs. For example, agricultural workers in the Goulburn Valley will benefit from a newly built village to house 60 workers, and 12 new townhouses for agricultural workers are being developed in Shepparton. Tourism workers in the alpine region will receive new accommodation facilities designed to house 1,300 employees.

In New South Wales, the state government launched the *Regional Housing Strategic Planning Fund* in 2022. The $12 million grant program is designed for local governments—with the aim of delivering a range of projects, including affordable housing. Now in its third round, eligible projects include *'affordable housing strategies and affordable housing contributions schemes'* (DPHI 2024: 7) (Table 3).

In Western Australia, the Cook Labor state government established an Infrastructure Development Fund (IDF) worth $80 million to deliver infrastructure components including water, electricity and sewage to support the supply of new housing (Table 3). The funding is divided into three streams, of which $40 million is dedicated to Stream 3: 'Unlocking Regional Accommodation'. Aimed at both developers and local government, the program aims to mitigate the current infrastructure constraints to housing delivery. In September 2024, the West Australian Government announced a $5.3 million boost to funding specifically to deliver 150 key-worker dwellings in regional Western Australia (Government of Western Australia 2024a). Most of the funding applications were from local governments for IDF Stream 3 for regional worker accommodation, and a shire stepped in to develop worker accommodation when a private provider withdrew from an arrangement in Kalbarri (Government of Western Australia 2024b).

The WA Government is also working with local government authorities through the Regional Development Assistance Program (RDAP). The program aims to incentivise private investment in regional locations to accelerate land development where it has been either limited or absent. While local governments apply to deliver projects under the RDAP, the approved applications would be delivered by Development WA—the state development agency. A Call For Submissions framework is another avenue to fund the delivery of worker accommodation in regional Western Australia (Government of Western Australia 2025). The most recent round specifically targets affordable *'service worker housing'*, which may be owned and managed by the local government or through a private entity (DHW 2025: 3).

At the regional level in Western Australia, the Gascoyne Development Commission, Development WA, Department of Planning, Lands and Heritage, the Shire of Exmouth, Shire of Carnarvon, and Shire of Shark Bay commenced a project aimed at addressing the shortage of worker accommodation in the region. The Gascoyne Land and Housing Development Project has released land to attract private investors to the region to deliver housing (GDC n.d.).

A smaller-scale program was identified in the south-west of Western Australia, led by the South West Development Commission. Recognising the challenge of housing workers—particularly for the wine and tourism sectors—a steering group was established to identify and fund solutions (SWDC 2023). The steering group is an example of local organisations delivering local solutions—as it comprises the tourism association, the wine association, local government authorities, and Tourism WA. The steering group has provided a $50,000 grant to a local holiday park to develop a range of worker accommodation options that provide powered sites to those living in tents, vans and campers.

There are clear differences between approaches and trends in regional worker housing provision in responding to the need for supply and affordability.

For instance, Victoria's Seasonal Workers Accommodation Program is broader in scope than programs in New South Wales and Western Australia, and a higher proportion of applicants for this scheme were private companies and health providers (RDV 2025). Western Australia's IDF Stream 3: Unlocking Regional Worker Accommodation Opportunities was open to private companies and local governments—with successful applications mostly from local governments. Other grants in both New South Wales and Western Australia were for local governments. All grants target the supply of regional worker housing—although making the housing costs affordable was not necessarily a key theme.

Table 3: State-government programs to generate additional regional worker accommodation

	State	Funding body	Eligible recipients	Purpose	Value
Infrastructure Development Fund	WA	Department of Planning, Lands and Heritage	Developers, landowners and local governments	Assist with the resolution of infrastructure or site constraints (water, wastewater, electricity)	$40 million (of $80 million)
Regional Development Assistance Program	WA	Development WA	Local government	Incentivise private investment into regional locations to deliver housing projects	unknown
Call for submissions from local governments	WA	WA Department of Communities	Regional local governments	Deliver social housing, affordable rental housing, and key and service worker housing	$50 million
Gascoyne Land and Housing Development Project	WA	Gascoyne Development Commission	Private investors	Develop newly released land sites	Unknown
Tackling the worker accommodation shortage	WA	South West Development Commission	Local industries	Deliver housing for seasonal workers in the wine and tourism industries	$50,000
Regional Worker Accommodation Fund	VIC	Regional Development Victoria	Developers, landowners and local government	Stimulate investment in regional housing and related services	$150 million in Round 1
Regional Housing Strategic Planning Fund	NSW	NSW Department of Planning, Housing and Infrastructure	Local government	New housing strategies, preparation of infrastructure and servicing plans, and amendments to plans	$12 million

Source: Compiled by authors.

1.4 Research methods

This research project addressed the overarching question:

- How can workers in Australia be better accommodated to ensure a healthy, safe and productive workforce in regional areas?

The project focussed on non-metropolitan regions in Australia where agricultural and tourism industries form a substantial portion of the economy. It addresses four research questions:

1. What are the contemporary practices used to provide accommodation to agricultural and tourism workers in regional Australia? What are unintended and unwanted consequences of these practices?

2. What are the accommodation experiences of workers in regional Australia and how do they shape their labour market choices?

3. What are the barriers to innovative practices to providing healthy and safe accommodation for agriculture and tourism workers in regional Australia and comparable international locations?

4. What policy changes are needed to support innovative practice solutions to address worker accommodation pressures in regional Australia?

The research adopted a case-study methodology and focussed on regions where it was known that worker accommodation was an issue—either because of a shortage of available housing or because housing used by workers was not secure or appropriate. This was supported by a two-stage qualitative approach to data collection.

1.4.1 Case-study locations

The selection of the case studies was designed to capture a range of seasonal and vulnerable workers in non-metropolitan locations with strong tourism and agriculture industries in Western Australia, New South Wales and Victoria. The selected case-study regions include:

- Augusta-Margaret River-Busselton: a tourism- and agricultural-focussed region in the south-west of Western Australia (the Margaret River Region)

- Coral Bay: a tourism-focussed locality in northern Western Australia (Coral Bay)

- A tourism- and agricultural-focussed region in Victoria (Victoria Case Study 1)

- An agricultural-focussed region in Victoria (Victoria Case Study 2)

- Coffs Harbour: an agricultural- and tourism-focussed region in northern New South Wales (Coffs Harbour)

- Clarence Valley: an agricultural- and tourism-focussed region in northern New South Wales (Clarence Valley)

- Richmond Valley-Hinterland: a tourism-focussed region in northern New South Wales (Richmond Valley).

In-depth descriptions of the case-study regions can be found in appendices 1–5, detailing their economic, demographic and housing profiles. The appendices also contain:

- additional quotes

- location-specific findings around the experiences of seasonal and vulnerable workers

- barriers to housing delivery

- policy outcomes.

The appendices provide in-depth background information for this report. The short summaries below provide context for the remainder of the report.

Western Australia

Margaret River Region comprises two local government areas: the Shire of Augusta– Margaret River and the City of Busselton. The term 'Margaret River Region' is commonly used to denominate the south-west region of the state. Margaret River has well-established wine, agricultural and tourism industries, which are markedly seasonal and have an overlapping peak demand for labour in the period from November/December to late April (ACIL Allen 2022).

The Margaret River Region has a resident population of about 57,000, with the majority concentrated in the City of Busselton. The region has a very low rental vacancy rate, below 1 per cent for most parts of the region, according to SQM Research (2025c) and a relatively high median weekly rent of >$700 for all dwelling types combined (SQM Research 2025c). Margaret River has a large number of WHMS and AS workers, as well as a smaller cohort of PALM workers (ACIL Allen 2022) who were working in agriculture and began working in tourism and hospitality after the COVID-19 pandemic.

The peak tourist season coincides with the harvest season—in particular for wineries. This creates a severe accommodation shortage, particularly since the advent of online holiday-rental apps.

The region's popularity with WHMS and AS workers is due to the range of coastal, recreational and infrastructure amenities, but businesses struggle to find workers during the peak season when they are most needed, and have to pay a premium for skilled workers due to accommodation shortages. Workers are viewed as being in competition:

- with residents—for residential housing
- with tourists—for caravan-park accommodation.

There is little land available in the townsite for worker accommodation because of the premium it generates as residential or tourist accommodation. Backpacker accommodation is at a premium in peak season with the two backpacker hostels operating at full capacity and regularly turning away WHMS and AS workers.

Coral Bay relies heavily on WHMS and AS workers for its workforce. Coral Bay is a small coastal settlement 1,400 km north of Perth, located in the middle of the 350-kilometre-long World Heritage–listed Ningaloo Reef. It is not a gazetted townsite, but designated as a tourism node by state and local planning policies. It is located within the Shire of Carnarvon.

Planning policies place a cap of 4,800 on the number of people who can stay overnight. However, there is a permanent population of approximately 250 workers and business owners. Residential subdivision is not allowed in Coral Bay and the closest town, Exmouth, is 150 km to the north. Workers stay in accommodation arranged by employers, and accommodation options are variable and very limited. The population is highly mobile, with a significantly younger population than the Western Australia median age: 33 years of age compared to 40 years.

Land in Coral Bay is constrained by pastoral stations, conservation reserves and a marine park. Coral Bay is experiencing a slow process of formalisation that is frustrating for longer-term residents, all of whom have experienced informal or inadequate housing for extended periods.

The majority of freehold land is used for tourist accommodation, and the owners of the small number of houses in Coral Bay are only allowed to be occupied by residents for nine months of the year. The majority of workers are housed on the land of one of the four landowners, Bayview Caravan Park, in a variety of housing ranging from semi-permanent 'dongas' to caravans, small homes and converted buses. Due to caravan-park regulations, these homes must be capable of being removed in the event of a cyclone.

Bayview Caravan Park rents land on a monthly revolving lease to business owners who are responsible for providing portable accommodation for their staff—and for themselves. They can be forced to remove their accommodation with two months notice. The worker housing shortage is so severe that couples are preferred to single employees because of the lack of bed space, and accommodation problems regularly cause staff to leave the settlement. There is an extremely severe accommodation shortage and workers can be given as little as two days notice to vacate their accommodation.

Coral Bay presented an opportunity to research the opportunities and barriers for Aboriginal organisations in delivering workers' accommodation through arrangements to address native title. To the best of our knowledge, Coral Bay is the only location where the state has engaged with an Aboriginal corporation to deliver workers' accommodation. Coral Bay is on Baiyungu Yinnigudurra Country and the Baiyungu Aboriginal Corporation (BAC) is one of the four landowners in Coral Bay. The BAC came to an agreement in 2010 that included procuring freehold land possession for workers' accommodation and has subsequently been involved in discussions for workers' accommodation. The two newest large worker accommodation developments are a result of agreements with the BAC over land at the northern end of Coral Bay. The Director of the BAC, Paul Baron, led this aspect of our research, contained in Chapter 6, and is a co-author of this report.

Victoria

Due to the small number of employers in the two Victorian case studies, and past events at one of the case-study locations where PALM workers were threatened, we determined that extra caution was needed to ensure the confidentiality of respondents and reduce the risk of harm to participants. For these reasons, we do not reveal the two Victorian case-study locations, instead referring to them as Victoria Case Study 1 (V1) and Victoria Case Study 2 (V2). PALM workers in both locations work in meatworks.

V1: The urban centre of V1 is shaped by agricultural and tourism industries. The permanent population is approximately 50,000 people with a median age above Victoria's median of 38 (ABS 2021i). The housing profile in the region in dominated by separate houses, which means there is limited diversity in housing stock (ABS 2021i). The median rent for the urban area was approximately $530 a week, which represented a sizable increase on the previous 12 months from March 2024 (SQM Research 2025b). Again, a low vacancy rate (under 1%) indicates that it is difficult for tenants to find properties (SQM Research 2025b). Land is only slowly released onto the market, and there is resident resistance to moves towards purpose-built permanent worker accommodation.

V1 has a large meat-processing operation that employs all of the PALM workers in the region. This makes the employer very influential locally, in addition to the PALMS provisions that prevent workers from changing employer. The work is physically challenging and workers struggle to address medical problems or reduce their workload due to personal circumstances. Our interviews and local newspaper articles both documented systemic issues with worker wellbeing in the workplace and with their accommodation. The accommodation shortage has meant that PALM workers are housed in a variety of different accommodation types—including university housing—and generally share rooms. Few PALM workers have found their own accommodation.

V2 covers three local government areas. The employment profile includes agriculture and manufacturing. V2 has a resident population of approximately 50,000, and an average age older than the state median of 38 years (ABS 2021g). The town's main industry is manufacturing—including meat processing. The rental market in V2 is tight, with an average vacancy rate in the region of under 3 per cent (SQM Research 2025b). The combined median rent for houses and units in the postcodes that make up V2 was $534 a week (SQM Research 2025b). Housing availability in V2 considerably during COVID-19 due to urban–rural migration during the Victorian lockdowns. There is also a lack of emergency accommodation—as experienced during the 2022 floods that affected the caravan park where PALM workers were staying.

The year-round meat-processing plant employs approximately 200 PALM workers, who arrived during the COVID-19 pandemic in response to a shortage of workers. While PALM workers predominantly stay in caravan parks and shared houses rented by the labour hire provider (LHP), a small number have found accommodation in the private rental sector. These workers are vulnerable to precarious housing, and have community and religious advocates through the relationships they have developed with community organisations. In comparison to V1 workers, V2 workers expressed fewer concerns with their employer—although supporting organisations raised concerns about employer engagement on welfare concerns—but still experienced precarious housing (see Chapter 2 and Appendix 4).

New South Wales
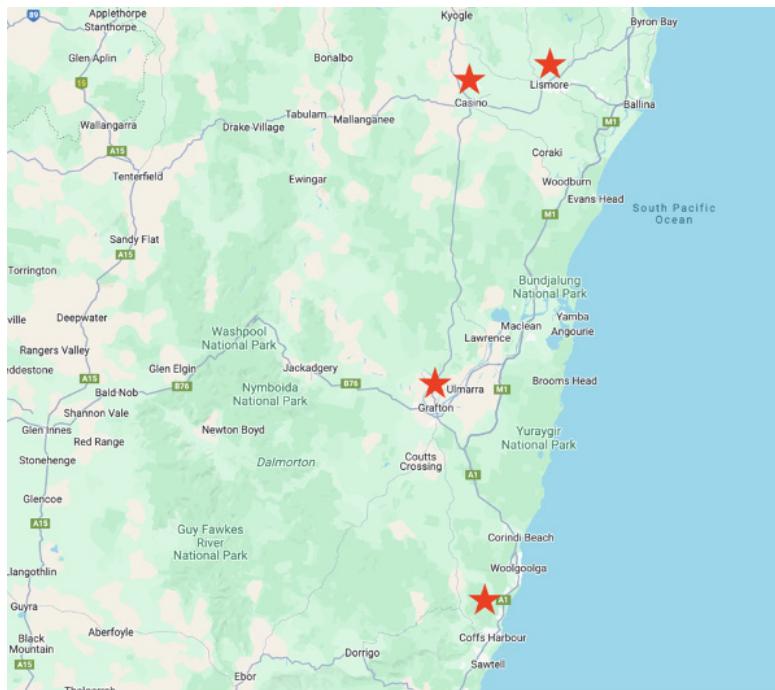
The case-study regions in northern New South Wales respond to a mobile group of vulnerable workers and the industry stakeholders who assist them. In particular, the case-study regions focussed on Grafton (Clarence Valley), Lismore and Casino (Richmond Valley) and Coffs Harbour (see Figure 2). These areas are reportedly where the largest number of PALM workers are located in the state (Interviews SN3, SN4).

PALM workers in these regions were largely engaged in horticulture and fruit picking. As a result, they tended to be more mobile than others, shifting worksites more regularly, depending on employer harvest priorities This contrasts with those working at abattoirs and meatworks who were confined to one worksite for the duration of their contracts. The mobile workers from these regions were generally PALM workers, but also included some working in the agriculture sector who were outside the PALM scheme.

The regional populations range from 53,000 people in the Clarence Valley to 92,000 in Coffs Harbour. The median ages of the populations were all older than the New South Wales median of 39 years—the oldest population found in the Calrence Valley had a median age of 49 years (ABS 2021d).

All three areas were lacking in diversity of accommodation options, with a majority of the dwellings being separate houses. This may limit opportunities for more affordable housing options in the private rental sector. The accommodation for PALM workers is generally provided by their employer. The rental market in March 2025 was tight, with vacancy rates ranging from 0.7 per cent in Grafton to 1.3 per cent in Coffs Harbour (SQM Research 2025a). Median rents across the regions were $598 per week for a house and $448 per week for a unit (SQM Research 2025a), with properties in Coffs Harbour being more expensive than in Casino. Based on these rents, and the incomes recorded in the 2021 Census for these regions, local households are likely to be paying more than 30 per cent of their income towards their housing costs, indicating an unaffordable private rental market.

PALM workers stayed mainly in houses rented by LHPs. However, due to a lack of investment in appropriate housing options, some reported staying in shipping containers and temporary facilities—including disused schools, council buildings and a hostel. PALM workers in these regions were more isolated than PALM workers in Victoria, as they were located away from population centres, at times for extended periods, and lacked transport options. This isolation is a concern, as local organisations are often the most important advocates for PALM workers, and the most likely organisations to provide immediate assistance to address crises or pressing issues.

Figure 2: Northern New South Wales case-study areas

Source: Google Maps (2025).

1.4.2 Qualitative approach: interviews and focus groups

Stage 1: Interviews

In the first stage of the qualitative approach to data collection, semi-structured interviews were held with 72 industry stakeholders and 33 regional employees across the three case-study areas (see Table 4).

Industry stakeholders included labour hire firms, employers, real estate agencies, local government planners and community services managers and organisations that support workers. In the case of Coral Bay, two workshops were also held with managers and business owners to capture a broad range of views. These interviews and workshops focussed on factors impacting on the:

- availability and quality of accommodation
- characteristics of the regional labour force
- initiatives to address accommodation shortages
- potential responses.

Interviews were held with workers to understand their experience of housing. At the outset of the research, it was anticipated that workshops would be used to capture the view of workers. However, it became quickly evident that workers did not want to participate in the public workshop setting and opted for more private interviews due to the precarity of their employment.

The type of regional worker differed by case-study region, with AS and WHMS workers being interviewed in Coral Bay and Margaret River, and PALM workers interviewed in the eastern-state case-study locations. Interviews were conducted online or in person in safe private spaces. PALM workers were particularly cautious about speaking with researchers on this topic due to their reliance on their employer for current and future work. Therefore, a Tetum-speaking research assistant, with significant experience working with migrant workers, was employed to undertake interviews with East Timorese workers in Victoria and PALM workers in New South Wales. Interviews in Tetum were translated into English for analysis.

We also interviewed three international experts on visa and worker accommodation provision. Economic geographer William Terry is an expert in temporary labour migration to the USA and has researched regional worker accommodation. Sophie Vancauwenbergh and Michaela Gasperini from Milieu Law & Policy Consulting are experts in European Union labour laws and temporary labour migration. All interviews were recorded and transcribed before being thematically coded using NVivo software.

Stage 2: Focus groups

Focus groups constituted the second stage of this research. Focus groups were designed to explore responses to issues identified in the case-study regions in Stage 1, notably:

• the application of policy responses

• the barriers to policy responses

• the appetite for a range of different policy responses.

The focus groups in Coral Bay, Margaret River and Victoria brought together seasonal and vulnerable workers, industry representatives and housing stakeholders. These in-person sessions were conducted in the case-study areas and ran for approximately 90 minutes each.

Before the focus group, a discussion paper informed by findings from all of the case-study regions was distributed among participants. The discussion paper proposed a range of policy responses to the issues identified in Stage 1. During the focus group, participants were asked to rank the policy responses and identify the policy response that was most important to them. That policy response then formed the focus of the group discussion and informed the findings in the report.

Focus groups in northern New South Wales were affected by ex-Tropical Cyclone Alfred in March 2025. The unprecedented weather conditions resulted in the cancellation of planned in-person focus groups with industry stakeholders. Instead, an online focus group was held for 17 PALM workers across Australia. Participants again reflected upon and ranked a series of policy recommendations designed to improve their accommodation outcomes. The group rankings were then used to inform the topics of conversation.

Table 4: Project participants

Interviewees	Coral Bay	Margaret River Region	V1	V2	NSW	TOTAL
Seasonal workers						
AS workers	9					9
WHMS workers		8				8
PALM workers			8	3	5	16
TOTAL	9	8	8	3	5	33
Stakeholders						
Local government	1	3	1	1	2	8
State government	1	2			2	5
Local business owners/groups	3	4		1	1	9
Accommodation	2	2				4
Migration/labour agents				1		1
NGOs/community organisation		2	2	6	2	12
TOTAL	7	13	3	9	7	39
International experts						3
Focus groups*	9	9	3 (+17 nationally)			38
PARTICIPANTS**	18	24	11 (+12 nationally)	12	12	92

The focus group in New South Wales was cancelled due to ex-Tropical Cyclone Alfred, and we organised additional interviews instead. The Victorian focus groups were split into stakeholders (3) and PALM workers (17). The PALM workers focus group was organised online and included workers from New South Wales and Western Australia.

*** Some participants participated in both the interviews and focus groups. These participants are only counted once in this row.*

We use codes throughout the following chapters to reference the interviews and focus group participants. The codes for participants in the interviews and focus groups can be found in Appendix 6, and are listed in Table A18 and Table A19.

1.4.3 Analysis of findings

All interviews, workshops and focus groups were transcribed and, when conducted in Tetum, translated into English. All interviews, workshops and focus groups were thematically coded in NVivo using inductive coding methods, where an initial group of codes were drawn from the literature and research questions, then additional codes generated through the coding process.

Two researchers undertook the coding for all information and worked together to ensure that the codes were clearly defined and consistently applied. After approximately 10 per cent of the interviews were coded, there was a review of the coding structure and codes were reorganised to ensure that the themes were organised to effectively respond to the information from the interviews. There was a second review after the focus groups in Stage 2 that focussed on the 'accommodation initiatives' sub-themes.

Table 5: Themes from NVivo coding

Theme	Sub-themes	Coding references
Accommodation experiences	90	193
Accommodation initiatives	63	110
Accommodation attributes	29	64
External factors (context)	12	22
Planning and regulation	16	34
Worker profiles	9	14

The coding structure captured 328 references and was divided into six themes, with a total of 219 sub-themes within a hierarchy of responses. These themes addressed six broad areas (see Table 5) that focussed on different dimensions of worker accommodation as well as its regulation, and discussions of both local and external solutions. Worker profiles were comments on the characteristics of seasonal workers in case-study regions.

We also want to acknowledge the gaps in this study.

First, labour-hire firms were unwilling to speak to us in our case-study locations. While we were able to find ways to engage with PALM workers, their employers were averse to participating in research projects. This limited our capacity to test and analyse stakeholder consensus in the Victorian and New South Wales case studies. Our focus group in New South Wales was looking promising, but was then cancelled due to Cyclone Alfred. The findings in Chapter 5 are largely drawn from Margaret River Region and Coral Bay, where we had exceptional stakeholder engagement.

Second, the choice of case study limited the types of workers and industries who participated in this study. While PALM horticultural workers were interviewed, we did not interview Australian horticultural workers, nor was our work based in regions with sheep and cattle industries. Hence the accommodation experiences of shearers and other remote farm workers were not addressed.

The limits of a case-study approach are that although we get depth of information and understanding of issues in these locations, we cannot generalise across other locations in Australia. We use comparative analysis between case studies to identify similarities and differences in accommodation provision and issues. The appendices provide important contextual information for readers who are seeking to compare our findings with their locations. With this in mind, Coral Bay is a unique location, as it is a tourism node and not a normalised 'townsite'. Care should be taken when comparing Coral Bay with other localities.

1.4.4 Report structure

The report structure addresses different policy dimensions of precarious worker accommodation. As is evident from this chapter, accommodation for seasonal and vulnerable workers has a number of different dimensions regulated by different levels of the state, and sits awkwardly across private and public areas of responsibility.

Chapter 2 uses interview information and fieldwork to analyse the contemporary practices used to provide accommodation, and the experiences of workers, focussing on identifying the major issues and the requirements workers have for their accommodation.

Chapters 3–5 analyse and respond to barriers and responses in different policy areas that impact seasonal and vulnerable workers' accommodation. These policy areas are:

• visa conditions

• standards for regional worker accommodation

• stimulating supply for worker accommodation.

Chapter 6 addresses working with Aboriginal corporations to provide regional worker accommodation, based on the experiences of the Baiyungu Aboriginal Corporation in Coral Bay. There are important lessons for Aboriginal corporations and governments to consider when taking up initiatives for workers' accommodation.

Chapter 7 summarises our findings. It also provides policy development options for different levels of administration to provide safe and secure accommodation for workers in regional industries.

2. Seasonal and vulnerable workers' accommodation experiences in regional Australia

- **Accommodation for seasonal and vulnerable workers in regional industries is consistently inadequate, at times financially exploitative (particularly for PALM workers), and regularly impacts workers' health and wellbeing.**

- **There is significant diversity and unevenness in the type and provision of worker accommodation, including wide variance in quality and cost within the same locality. A one-size-fits-all approach to regional worker accommodation is insufficient for meeting diverse and varied worker needs.**

- **Workers' experiences of regional accommodation are structured through visa conditions. They depend on whether an employer or third party provides the accommodation, and on the accommodation supply and demand in that locality.**

- **Worker accommodation needs to cater for both seasonal and permanent workers, and to cater for the requirements of different groups of workers.**

- **Workers prioritised different aspects of accommodation, including access, privacy, affordability, safety, sociality, assistance and the quality of facilities.**

Chapter 2 draws on analysis of interviews and fieldwork to understand the current practices used to house seasonal and vulnerable workers, and to explore their accommodation experiences. These findings provide the foundation for the later chapters that focus on how to improve these experiences. The themes that emerge from workers' accounts address:

- access
- affordability
- the quality and adequacy of facilities

- issues of crowding and privacy
- safety
- relationships with host communities
- sociality and inclusion.

This chapter concludes with the implications of these findings for future policymaking and worker accommodation planning and development.

This chapter tracks a range of experiences that addresses WHMS and AS workers in Coral Bay and Margaret River, and PALM workers in Victoria and New South Wales. While experiences and issues are shared across locations and groups, they often manifest in different ways due to the differences between these three groups.

Sections 2.2 and 2.3 address similarities and differences between groups and locations within themes; Section 2.4 summarises the experiences of different types of workers and reflects on the variables of employment length and remoteness.

Note that appendices 1–5 provide a more detailed account of each case-study location, with additional evidence.

2.1 Existing research on seasonal and vulnerable workers' accommodation experiences

Chapter 1 has already reviewed literature on the accommodation experiences of seasonal and vulnerable workers. It discussed:

- the problems with tight, competitive housing markets (Beer et al. 2011; Buckland et al. 2023; Verdouw et al. 2021)
- the common experiences of high rents, substandard conditions and overcrowding (Bailey 2018; Barry 2021; Faleolo 2019; Petrou and Connell 2022)
- the possibility of being subject to segregation and racial profiling (Bailey 2018; Barry 2021; Perry 2018; Petrou and Connell 2022).

These issues are explored for the five case studies in this chapter.

Howe et al. (2019) observed that while newer accommodation for horticultural workers was generally of a higher standard than earlier options, persistent noncompliance with council standards and building regulations was concerning. Accommodation was variable with issues of overcrowding, high costs and overbearing house rules. House rules were enforced with fines of up to $500 and there was considerable fear among PALM workers of contract termination and forced repatriation. Howe et al. (2019) found distinct differences in accommodation between visa types. WHMS workers relied more heavily on hostel and caravan-park accommodation providers for work and transportation.

Accounts of PALM worker accommodation are troubling. Petrou and Connell (2022) note that accommodation is often a problem for employers, given the remoteness of the work and the limited availability of accommodation in these locations. They found there was an average of:

- four workers per bedroom
- eight workers per bathroom
- 26 workers per kitchen.

While this is overcrowded, it meets the PALM scheme guidelines. In caravan parks, adult workers are allocated bedrooms and bunkbeds that are designed for children; storage and lockable spaces designed for holidaymakers are inadequate for long-term stays with only basic amenities. An International Labour Organization report (ILO 2022) examined accommodation and found that while the rules met international standards, there were multiple reports of standards being breached. The ILO found that in Australia, there was an average of:

- 3.1 workers per bedroom (but could be up to 10)
- 5.8 workers per bathroom.

Petrou and Connell (2022) explained that the rationale for poor accommodation is based on the assumption that PALM workers are temporary—and therefore do not require or appreciate accommodation above a basic standard. Petrou and Connell argued that these assumptions are false, as workers often stay longer periods with expectations of reasonable accommodation.

Oversight and management of accommodation is generally poor and done remotely (ILO 2022). Petrou and Connell (2018) documented a pervasive sense of isolation and boredom due to the distance to shops, and lack of personal space, as evidenced in northern New South Wales. The accommodation costs to PALM workers generally exceed the market rate given the locations, standards and services provided, and rates are set to generate a profit rather than cover costs (ILO 2022).

2.2 Accommodation provision

Drawing from interview data and fieldwork, this section examines the contemporary accommodation experiences of different groups of seasonal and vulnerable workers across the five case studies. Analysis of accommodation experiences provides insight into the specific requirements and housing needs of these workers, as well as insight into shortcomings in the provision of accommodation.

2.2.1 Types of accommodation

Across the case studies, there is considerable diversity and unevenness in the types of housing utilised by seasonal and vulnerable workers. Contemporary accommodation options ranged from formal sites like houses and hostels, to unconventional solutions tailored to location-specific circumstances, such as shipping containers. While permanent accommodation is common, there is also a notable reliance on temporary or informal housing options, such as vans, caravans, tents and camping.

Western Australia

Coral Bay has a variety of accommodation types, including houses, duplexes, converted motorhomes, and caravans, as well as purpose-built accommodation blocks with single or double units. The Margaret River Region offers a diverse range of accommodation types including hostels, caravan parks and houses, as well as informal options like vans, sheds and tents.

Victoria

In V2, PALM worker accommodation consists of caravan parks, a worker-only motel, and a range of private rentals contracted through real estate agents—including houses. V1 has a similar range of accommodation types.

New South Wales

Accommodation types for mobile workers in northern New South Wales can vary widely, depending on the resources available to each area and employer. While traditional housing solutions like those used in the Victorian locations are present, there is also a noted increase in unconventional and stop-gap practices, like the use of shipping containers.

Across all locations, a state of temporariness is prevalent, and standard provisions cannot be universally assumed, as numerous exceptions are present. Table 6 outlines the dynamics of the most frequently used types of accommodation across the locations. A key difference is that PALM worker accommodation requires a single employer to accommodate a large number of workers, so there is more scope for reprovisioning buildings—such as schools and old motels—and for special relationships with property agents.

2.2.2 Practices of provision

Worker accommodation can be broadly categorised into two types:

- employer-linked or employer-provided housing

- independently sourced accommodation.

Employer-provided accommodation is directly linked to a worker's employment—which means accommodation is arranged, owned or leased by the employer or labour-hire agency. Such accommodation is key to the PALM scheme, and also present in Coral Bay.

Private or independently sourced accommodation is sourced by the workers themselves, and includes private rentals, hostels, caravan parks and caravans.

Coral Bay

In Coral Bay, there are only four landowning organisations. One of these organisations leases land to non-landowning employers who provide portable accommodation for themselves and their employees. Staff working for landowning organisations receive substantially cheaper and higher quality accommodation than staff employed by non-landowning businesses.

Accommodation is power in Coral Bay, as:

- employees are reliant on employers

- employers are reliant on the landowner where most of the worker accommodation is located.

Coral Bay is not a standardised town. It is designated as a tourism node in West Australian planning, and residential subdivisions are not allowed due to its sensitive location next to the Ningaloo Reef. To deliver much needed accommodation, the state-government built units that are run by the Department of Communities as public housing. See Chapter 6 and Appendix 2 for more detail on Coral Bay's unique situation.

Margaret River Region

Accommodation for AS and WHMS workers in the Margaret River Region is mainly independently sourced. While some employers offer rentals, camping spaces or assist in finding housing, the responsibility for securing accommodation largely rests with the workers themselves. Key accommodation providers in the region include hostels, caravan parks and private rentals.

PALM workers

For PALM workers, accommodation is primarily employer-provided, as approved employers are responsible for sourcing and supplying accommodation. In Victoria, employers own company houses that are rented directly to workers. Employers and labour-hire firms also lease properties, including motels (case-study V2) and caravan parks (case-study V1, where 60–80 PALM workers were housed).

Additional accommodation in the form of private houses are secured through rental leases for two to five years. Such housing is leased from real estate agents, and from private investors who purchase homes to lease to the labour-hire agency. Subleases are then drawn up for workers, and the individual rents are deducted from workers' wages.

In New South Wales, employers or labour-hire agencies are also responsible for accommodation provision, with some investing directly in the purchase of real estate—such as a hostel purchased in Tamworth. Workers engaged in fruit picking and who are moved around are housed in shipping containers.

Table 6: Conceptualising housing provision for seasonal and vulnerable workers

	Purpose-built worker accommodation blocks	House or apartment	Caravan park (vans, mobile homes, portable/modular housing)	Student accommodation	Motel/hotel (worker only)	Hostel	Repurposed facilities
Owner	Aboriginal corporation Private ownership	Investors, private ownership	Private ownership Local government	Universities	Private ownership, employers	Private ownership	Local council, state government
Landlord	Labour-hire company, state	Private landlord or real estate agent Labour-hire company	Owner or employer	Labour-hire company	Labour-hire company	Owner	Labour-hire company
Tenancy length	Tied to employment	6 months; one year	Weekly or monthly	Tied to employment	Tied to employment	Flexible	Tied to employment
Worker group types	AS workers	AS workers, WHMS workers, PALM workers	AS workers, WHMS workers, PALM workers	PALM workers	PALM workers	AS workers, WHMS workers, PALM workers	PALM workers
Case-study regions	V1, V2, Coral Bay	All regions except Coral Bay	All regions	V1, V2	V1, V2	Margaret River, NSW (mobile workers)	NSW (mobile workers)

Source: Authors

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2.3 Workers' experiences of regional accommodation

2.3.1 Access

Access addresses both worker access to accommodation and proximal access to services and amenities, including transportation. Issues of access to accommodation emerge primarily among workers who are expected to independently source their accommodation.

As PALMS-approved employers are mandated to provide adequate accommodation, PALM workers typically only face accommodation-access issues when opting for non-employer-provided accommodation. In comparison, WHMS and AS workers are often faced with little to no assistance finding housing in areas that are experiencing acute accommodation shortages.

Access to accommodation

Issues accessing accommodation occur when there are conditions that are favourable or must be met for a worker to gain access to accommodation. Criteria for accessing accommodation varies between locations.

In Coral Bay, a worker must secure employment to secure accommodation. Accommodation is very limited, and employers compete to secure staff accommodation. Pets are prohibited and it is *'virtually impossible'* to find work if a jobseeker has children or dependents (SCB7). As employers are also accommodation providers they prefer to employ couples as they can then *'get two in one bed'* (SCB6). *'Couples are preferred and single travellers will be knocked back due to the need to fill beds rather than rooms'* (SBC7). In Coral Bay, relationship status becomes a key determinant of a worker's access to accommodation and employment.

Conversely, in the Margaret River Region, workers stated that couples were at a disadvantage, and individuals found it easier to secure accommodation.

Different types of accommodation cater to workers with different priorities. For instance, one hostel operates as a *'working hostel'*, where it is *'made clear that it's a condition to have a job to stay at the hostel'* (WMR4), while other establishments cater to lifestyle-oriented workers. During the busiest months, workers reported that hostels became markedly more *'exclusive'*, with outsiders who lack an insider connection unlikely to gain access. Some hostels cater purely for international lodgers, and *'don't let Australians stay'* (WMR4), Workers also state that private accommodation providers are more likely to privilege workers with high levels of English proficiency (WMR7). Thus, a worker's lifestyle preferences, employment situation and personal background all influence their eligibility for certain accommodations.

In Victorian case-study V1, PALM workers on long-term contracts sometimes seek independent private accommodation. However, local stakeholders and workers both identify that PALM workers can experience discrimination from private accommodation providers. Reportedly some Facebook advertisements for share houses explicitly stated that people working for PALMS employers need not apply (SV1-1). A local government employee stated:

> Somebody told [a work colleague], 'Hey, you know, we look at the surname and then decide who to give the house to, so unless you're a John Stone or a Harrington, you're not gonna get a house.' [SV1-1]

This indicates informal racial barriers limit access to accommodation.

Informal networks and social connections play an important role in navigating barriers to accessing accommodation. For WHMS and AS workers, word-of-mouth communication via friends, relatives and other workers is an important source of information on employment opportunities and accommodation (WMR2, WMR3, WMR4, WMR5). Workers stressed the importance of social media groups, particularly those related to communities of workers originating from their home country (WMR3). Others mentioned that their prospective employers, and colleagues at the workplace, helped them secure accommodation (WMR1).

Some WHMS and AS workers suggested that it would be useful to bundle information around accommodation for seasonal workers on location-based, regionally anchored online platforms (RCB1, WMR3, FGMR8). The interviewees argued these platforms could be a place for advertising vacant accommodation but could also facilitate greater housing literacy, as well as smooth relationships with the local community.

Online information hubs for seasonal workers could be a vehicle to inform WHMS and AS workers' about:

- their rights

- the expectations of their hosting communities

- the rules and codes of conduct around camping, neighbourhood noise and amenities.

PALM workers would require information provision through migration agents and employers (discussed in Chapter 3 and Chapter 4).

Access to services

Workers across all case studies wanted accommodation that is conveniently located and within reasonable proximity to their workplace, community hubs, and services—especially in New South Wales, where highly mobile PALM workers seek engagement with their temporary local communities. Issues of accessing services are less prevalent for workers in Coral Bay due to its small size. Workers in the Margaret River Region preferred accommodation close to centres of activity and services. Workers who lived close to town centres in the Margaret River Region were satisfied with their access to amenities, and suggested that proximity to services played a key role in choosing where to stay. The group with the largest barriers to accessing services are PALM workers on farms (see Box 1). Some employers had restricted PALM workers' movements:

> PALM workers are told that they're not permitted to leave accommodation sites such as caravan sites without the approval of one of these intermediary figures. … They have no physical alternative really, but to buy from essentially the equivalent of what used to be called a company store. (SN2)

The prices at the store are generally inflated, and can lead to debts to the LHP. These exploitative practices can undermine the capacity of PALM workers to meet their savings goals, as well as preventing access to services.

Box 1: Transport as a barrier to accessing amenities and services for mobile PALM workers in New South Wales

Mobile PALM workers in New South Wales are frequently 'accommodated in isolated circumstances and given limited access to mobility' (SN2 2024). Without reliable transport, workers faced difficulty accessing essential services and shops, as well as social, community and religious connections. When workers did have access to transport, often it was closely under the control of the employer. One worker described their experience:

The farm is usually far away from facilities, when we have restrictions in using company van or car, it becomes very difficult to us … The restriction from the agency prevented us to visit anyone or any significant place, we were isolated … In [Region], our nearest shop is [Town], which is about 50 minutes. (WN5)

This account echoes a sentiment frequently voiced by mobile PALM workers. The distances between accommodation—which is frequently isolated—and services are often compounded by workers having limited access to transportation.

Access to accommodation can be restricted based on relationship status, presence of children, English-language skills and ethnicity. Accommodation access differs between locations and workers, depending on accommodation availability, visa status, who provides accommodation, and the attitudes of accommodation providers. Access to services is an issue in rural locations—particularly for farmworkers.

WHMS workers had greater choice and agency in addressing access to services than PALM workers, who were more reliant on employers and faced multiple barriers to finding alternative accommodation.

2.3.2 Affordability

Affordability is a key area of concern for workers in all case-study areas. For many workers, cost was one of the most important factors when choosing accommodation.

In Coral Bay, most workers had little choice in their accommodation arrangements, as accommodation is typically provided through their employer. Single villas were deemed unaffordable for a single resident. In one instance, a worker arrived and was allocated caravan accommodation with their partner. When the couple broke up shortly afterwards, the remaining worker was left paying the unaffordable rent by themselves (RCB1). Paying for a caravan, which cost $200 per week, plus bills, was deemed excessive (RCB7). Seasonal fluctuations in income exacerbated affordability concerns as workers in a *'slow week'* worked significantly fewer hours but had to pay the same rent (RCB8).

For WHMS workers in the Margaret River Region, affordability was among the most important considerations. Many WHMS workers struggled to meet high accommodation costs in the private sector. WHMS workers, who are highly mobile, may even leave the region if they cannot find suitable affordable accommodation. This can have significant drawbacks for local businesses, who can potentially lose workforces.

The limited availability of housing stock—especially during peak seasons—means that workers who wish to stay in the region are compelled to accept whatever accommodation they can find, at elevated costs. For some workers, the most affordable solution with the desired facilities were hostels, despite them being considered poor value for money (WMR3, WMR4). For some workers 'illegal', or 'free-camping' is an affordable solution (WM1, WMR7).

Box 2: Variations in WHMS worker perceptions of affordability in the Margaret River Region

Within the Margaret River Region cohort of WHMS workers, three distinct groups emerged, with differing perceptions of what constitutes affordable accommodation.

- **Workers with vans:** Budget conscious, with a preference for the cheapest accommodation possible, which often means living in vans on campsites or even parked in driveways. Likely lifestyle-oriented.

- **Hostel backpackers:** Likely to be staying for shorter periods. Ideally willing to pay around $180 to $200 per week for hostel-like facilities.

- **Affluent backpackers:** Least price-sensitive and often staying for longer periods. Willing to pay $250 and above for private rental accommodation.

This method of grouping is not absolute and there is variation within each subcategory based on individual circumstances. However, these categories collectively highlight that even within a seemingly homogenous group of workers in a single location, there are considerable differences in perceptions of affordability.

PALM workers in Victoria and New South Wales were also concerned about affordability, with particular concern about rising rents, which they felt they had little agency to combat. Some workers reported paying a fixed rent per week regardless of how many people were sharing the room—which they felt was unfair. One worker in case-study V1, lived in employer-provided accommodation where around 10 to 15 people were sharing the cooking and washing facilities. They outlined their experience with rent increases:

> *When we arrived, the price per week was around $196. Recently, the company sent us a letter to sign, notifying us that the payment would increase to $202. We did reject it; everyone living in the accommodation felt the same. We agreed not to sign since the price is too high. However, an email came from the company saying that, if we don't sign, we have to look for other accommodation and leave. We were given options to live in [Accommodation], but we cannot do that since those places are not secure ... As women, we decided to sign the agreement with the increased rent. (WV1-2)*

For many PALM workers, a key priority was having excess income to send home.

In multiple interviews with PALM workers, it was implied that employer-provided accommodation was more expensive than private accommodation (WN4, WV1-5, WV1-6, SV1-3). PALM workers explained that when they moved into a house from the private rental sector, the quality of the accommodation improved and the costs paid towards their housing decreased (WV1-5, WV1-6, WV1-8). A PALM worker in Victoria (V1) described the improvements he experienced when he moved to a private rental with other workers:

> *...The private accommodation offers a more peaceful environment. I disliked sharing a room with another person in the company accommodation, which made it hard to rest. Additionally, there were limited facilities [in the company-provided accommodation], with only one kitchen for many people. In the private accommodation, I dislike having to pay for everything, like electricity and internet. ... [But] the company accommodation was more expensive than the private one. The downside of the private accommodation is that you have to manage everything yourself. (WV1-4)*

The amenities are better and the costs lower when PALM workers directly rent their accommodation.

One reason for this is the inflated accommodation prices for PALM workers in employer-provided accommodation. As a representative from a LHP stated:

> *Before [the LHP] took over that caravan park, those caravans were going for $200, $300 a week. And then once the PALM workers came, there was a change in the lease arrangement and they went up to $800. (SV2-7)*

Workers had a strong desire to regain greater control of their accommodation situation to save money. PALM workers often commented on the lack of information about accommodation costs; they were also the workers with the least power to address high costs.

Table 7 summarises the variation in cost for different accommodation types across locations, based on information from interviews with workers. There is great variation between locations, with worker accommodation offered by landowning businesses in Coral Bay substantially cheaper than staying in accommodation provided by other businesses who must lease land for their portable housing.

However, the greatest variance is between PALM workers, who generally pay rent per person regardless of how many people are sharing a room. In one instance, PALM workers in New South Wales were charged $175 per person for space in a four-person cabin ($700 per week), while in V2 workers paid $193 per person (collectively $772 per week) for a similar cabin arrangement (WN3, SV2-3).

Accommodation costs are the largest budget item for seasonal and vulnerable workers and often have little correlation with quality and privacy. They are also the major cause of financial distress.

Table 7: Variations in pricing by accommodation type and location

Location	Accommodation type	Cost (per week)	Details
Coral Bay	Single units	$380–$400	Deemed unaffordable for single occupants
	Double units	$460–$500	$230–$250 per person
	Caravan park (caravan site)	$230–$260	Cost includes bills
Margaret River	Hostel (shared dorms)	$190–$250 per person	4–8 person dorms
	Private rental (room in house)	$180–$300 per person	Instance of one couple who were paying $450 per week for a private room (SMR11)
	Caravan park (camping/ caravan site)	$100+	
	Driveway space for van parking	$100	Instances of tent space in backyard ($200 per week), or shed ($300 pw)
	Illegal camping	$0	
V2	Worker housing (employer-provided)	$107–$193 per person	4 people per cabin (up to $772 per week)
V1	Worker housing (employer-provided)	$85–$202	Often shared rooms
	Private rentals (multi-person shared house)	$120–$150	
NSW	Worker housing (employer-provided)	$150–$200 per person	Shared cabins (4–10 people), or private room in shared donga or shipping container

Note: These costs are sourced from interviews, and may differ from the constantly evolving price points at the time of reading.
Source: Authors

2.3.3 Facilities

Sleeping arrangements

PALM workers in all case studies made specific mention of negative experiences with their sleeping arrangements. One worker described their experience:

> The worst thing was the sleeping arrangements: sometimes three of us would share one room, and the beds were just like that, crammed together. One person slept on one side, another in the middle, and another on the other side. (WV1-8)

In some instances, workers slept on very thin mattresses, had poor-quality bedding, or slept on mattresses placed directly on the floor. This is a pressing issue for PALM workers. (Overcrowding in shared sleeping spaces is discussed below under 'Crowding and privacy'.)

Bathrooms and laundries

In most locations, experiences with unsatisfactory bathroom and laundry facilities were notable for some workers. In Coral Bay, some accommodation types lacked private bathroom and toilets, and many workers shared limited facilities.

Workers reported dissatisfaction at having to leave their accommodation and walk to shared ablution blocks, particularly during cold and wet weather (RCB8). In the Margaret River Region, experiences with bathroom and laundry facilities differed depending on the accommodation type, with hostels the most common site of complaints (WMR1, WMR2, WMR3, WMR4).

PALM workers on longer visas often shared bathrooms and washing facilities with many other workers in the Victorian case studies (WV2-2, WV1-2, WV1-6). In V1, limited bathroom facilities shared between 17 workers resulted in extended waits for showers—and showering last meant no hot water (WV1-6).

Mobile workers in New South Wales experienced great variation in their accommodation, so their experiences were also varied. In one worker motel, workers shared bathrooms and toilets, and washed their own clothing, but had access to a cleaner and a linen service (WN4). Another worker at a different location explained that all their toilet facilities were outside, hindering access during rainy weather (WN1).

Kitchens

Across locations, workers experienced challenges with kitchen facilities.

In Coral Bay many caravans have small private kitchen facilities, either inside or installed close by outside. While some units were equipped with private kitchens, other accommodation types utilised large communal kitchens.

In the Margaret River Region, the workers who discussed kitchen-related experiences were all hostel residents. Many stated that the facilities were poor, with broken or minimal equipment, limited fridge space, and insufficient space for the number of residents (WMR1, WMR2, WMR4).

In V2, access to kitchen facilities was important for workers. However, some houses provided by employers had inadequate kitchens—or no kitchen at all. In one house with no kitchen, workers were provided with a small barbecue (SV2-7). In shared cabins, workers who had access to a small private kitchenette were satisfied, as they could choose to either cook alone or together.

In V1, a major concern for many workers was the lack of kitchen equipment—especially rice cookers. In one case, kitchen facilities were deemed insufficient for 17 users (WV1-6). In another case, 40 people working shifts shared a kitchen, which led to workers purchasing fast food (WV1-7). While kitchen facilities were inadequate for all workers, PALM workers experienced the most crowded and inadequate kitchens.

Storage space and spatial control

A lack of storage space was a common issue across multiple locations, as it affected workers' ability to keep their living spaces clean and organised.

In Coral Bay, longer-term workers struggled to find space for their accumulated belongings, especially larger items like camping and fishing gear (RCB3, RCB6, RCB7). Issues of space often bled into concerns about spatial control.

Following Tropical Cyclone Owen in 2018, worker accommodation became subject to much stricter spatial controls. These controls forced the removal of informal structures like annexes and fences from caravans and modular buildings. For longer-term workers, the removal of these elements made the accommodation feel more temporary. Other issues of spatial control persisted, with one worker stating that they were made to '*get rid of*' their veggie garden, and were not allowed to store their bike outside (RCB2).

In V2, workers also found issue with a lack of storage space—with some stating that they had no shelves to store belongings on. The lack of storage space made it difficult for workers to keep their spaces organised, with one worker stating:

> *There are no shelves for us to keep our stuff on, so most of the time we just sleep on top of our clothes. They told us to keep the cabin clean and we try our best, but you can't. (WV2-2)*

In parallel, workers in New South Wales and V1 reported similar experiences, with a worker explaining that they '*couldn't even set up [their] things properly*' in their cabin (WV1-8).

Utilities and other facilities

In Coral Bay, workers faced issues of internet access. While some accommodation areas have installed Starlink, workers in other areas had to '*fork out*' for their own access (RCB6).

Two primary concerns consistently emerged for PALM workers in Victoria and mobile workers across New South Wales:

- air-conditioning/heating
- internet access.

Workers reported varying levels of air-conditioning, with some accommodation lacking it entirely, others with non-functional units, and some with excellent systems. Inadequate heating or cooling significantly impacts a worker's ability to sleep comfortably. Workers also expressed a strong desire for reliable internet access so they could stay in contact with their families. One mobile worker in New South Wales shared that they had no mobile service in their cabin, which made it difficult to maintain contact with family. As a result, they explained that regularly their '*family is upset*' (WN2). During the focus group, workers also raised issues around rubbish and recycling (P11-FNAT).

Figure 3: Sleeping quarters for PALM workers in New South Wales indicating the absence of storage space

Source: Photograph by Sr Denise Laverty.

Figure 4: Shared area in worker accommodation consisting of dongas (demountable buildings) in Coral Bay

Source: Photograph by Tod Jones.

Maintenance

The way that maintenance issues within an accommodation were addressed could affect the workers' experience.

In Coral Bay, the isolated nature of the township contributed to some difficulties with maintenance requests. Non-urgent requests sometimes went unsolved for extended periods of time, with issues like leaking roofs or faulty appliances often neglected (RCB6).

In the Margaret River Region, workers staying in hostels reported poor maintenance of many facilities, but that the managers were generally responsive to urgent maintenance issues. Workers emphasised that while poor maintenance for non-essential facilities (like barbecues) is inconvenient, it is also not unexpected for cheap accommodation.

In V1, workers in employer-provided accommodation reported any issues directly to their employer (usually through the human resources [HR] department). This led to some reluctance among workers to speak out, for fear of causing friction. One worker detailed their experience with reporting accommodation issues:

> In the company accommodation, they assigned a Timorese person to look after us. We would always complain and report the issues to him, but we never knew if the person passed the information on to the company. We only knew that we informed him. (WV1-7)

Among PALM workers across all relevant cases, those in more isolated areas faced greater difficulty in reporting and addressing maintenance issues.

The facilities offered in an accommodation have a significant effect on the worker experience, as they:

* influenced workers' comfort

* affected workers' ability to rest

* affected workers' overall wellbeing.

Daily challenges that negatively impacted worker experience included:

* inadequate sleeping arrangements

* limited bathroom and laundry access

* poorly equipped kitchens

* limited storage space.

Maintenance of services and facilities was more pronounced for workers in remote locations. Notably, PALM workers were less willing to advocate for these issues to be addressed than WHMS and AS workers.

Crowding and privacy

Lack of privacy and overcrowding in accommodation was detrimental to the worker experience. Overcrowding was also widespread. It was a concern in almost all of our interviews and was the largest code in our analysis. Lack of rest, conflict, concern for mental health, and general dissatisfaction emerge from a lack of personal privacy. (Conflict and health issues—often stemming from a lack of privacy—are outlined in subsection 2.3.4.)

In Coral Bay, accommodation shortages often forced managers to live with staff, and for workers to live on top of one another, which led to struggles with privacy and lack of personal space. One AS worker, employed in a management role, stated:

> I have a staff member living with me—and that is difficult. If I come home after a hard day, I have to be careful what I say about certain members of staff around the person I live with … (RCB2)

A former Coral Bay worker stated that they didn't fully comprehend how intertwined their work and personal lives were until after they left the region (RCB8).

For WHMS workers in the Margaret River Region, expectations of privacy differ considerably compared to those in Coral Bay. Workers concede that the 'backpacker' lifestyle comes with reduced expectations of privacy (WMR1). For some workers, a lack of alone time was deemed *'exhausting'*, but typical of the lifestyle (WMR3).

In V2, overcrowding was a major issue for PALM workers. Approximately 60–80 PALM workers live in shared cabins in a caravan park provided by the labour-hire agency. Workers voiced their dissatisfaction with these arrangements:

> *The cabins are meant for only one or two people, and they have four. They are swapping out single beds and putting bunk beds in so they can fit more people in. (WV2-1)*

One worker likened the conditions to 'living in a box' (WV2-1), while others were concerned about the lack of privacy, and the impact on being able to rest and get enough sleep. Community members working in pastoral-care roles confirmed that overcrowding and lack of privacy were common complaints, and would have a negative effect on the workers (SV2-7, SV2-8, SV2-9).

Reports of crowding were also widespread among workers in V1. Workers reported living in accommodation with two to six people in one room. In one instance, 17 workers lived in one house, with four to five in each room. Workers expressed discomfort sharing with so many others. As one explained:

> *Some of us are married and want to talk to our spouses or children. Sharing rooms makes it difficult to have private conversations about sensitive matters … and with many people in the house, it can be challenging for those on night shifts to rest during the day. (WV1-5)*

Workers in V1 expressed frustration about crowded conditions. In one case, 12 workers shared two bathrooms; struggles with scheduling showers led to workers often being late to work (WV1-5). In another instance, up to 20 workers sharing one kitchen devised a 'cooking roster' to better manage crowding while cooking (WV1-4). In contrast, workers who lived in private accommodation were satisfied, with *'plenty of space'* and a *'more peaceful environment'* (WV1-4). There was a clear consensus that private accommodation offered workers far greater privacy and comfort.

Mobile workers in New South Wales were particularly susceptible to issues of overcrowding due to their frequent location changes. One worker reflected that during their time spent in the PALM scheme, overcrowding in accommodation was nearly always an issue.

Workers reported sharing in dormitory-style cabins of up to 12 people. Key issues included:

- conflict between workers
- complaints about noise and smell
- difficulties getting sufficient rest
- general lack of privacy (WN1, WN2, WN3, WN4, WN5).

Reports from community members in pastoral-care roles reinforced the workers' accounts. One account described up to 20 people being housed in a shipping container temporary accommodation, with limited kitchen and toilet facilities (SN4).

All interviewed workers had a strong aversion to crowded accommodation, and outlined the negative impacts it can have on:

- mental health

- privacy

- productivity

- sleep

- harmony.

The worker experiences reinforced the importance of accommodation solutions that provide adequate space and privacy for workers.

2.3.4 Safety

Precarity

Precarity refers here to how easily a worker is displaced from their accommodation, and it is a concern for workers across all worker types and regions.

Workers in Coral Bay were especially conscious of precarity: due to the limited supply of accommodation, loss of employment meant that a worker must leave within 48 hours. As one worker explained: *It's not very secure … it's not like you sign a lease and you have that place for a year or two years. It's all riding on your job and anything that happens there'* (RCB7 2024).

These uncertainties are significant stressors for workers—particularly for semi-permanent and longer-term residents.

While accommodation for WHMS workers is largely privately sourced in the Margaret River Region, issues of precarity still arose. Workers were concerned that informal private rental arrangements could end with little warning, and one worker reported accounts of unexpected eviction from a caravan park to make room for arriving tourists (WMR5). Seasonal job cycles exacerbated these issues; a consensus emerged that accommodation became markedly more insecure and unstable during peak seasons.

In V1, some PALM workers felt as though the security of their employer-provided accommodation hinged on their maintaining compliance—even in unsatisfactory conditions. As one worker described:

> *Our leader complained about [sleeping arrangements] until the leader was removed, and no new leader was sent back to work there … because of what happened, they missed about four years— they never came back to Australia. (WV1-8)*

This sentiment was echoed across the Victorian PALM worker experience. Workers felt that their employment and accommodation was precarious—and their reluctance to voice concerns was a direct result of this perceived lack of security. Another example is how PALM workers were treated when they become sick. A PALM worker (who was later diagnosed with cancer) and, on returning, had to go to the office and speak with his managers:

> *I was told I had to choose between keep working or go home to Timor-Leste. I said I wanted to return to TL. I had to put in a resignation letter. (WV1-1)*

While WHMS and AS workers had insecure accommodation when there were severe accommodation shortages, PALM workers were continually insecure because of their visa arrangements.

Across all cases, workers articulated a desire for accommodation that was secure and stable. While none of the workers felt their accommodation was completely secure, workers whose accommodation was provided by their employers were most at risk and required additional protections.

Conflict

Conflict shaped workers' accommodation experience, and often emerged alongside employment-related tension and shared living dynamics. In multiple instances, workers reported that conflicts stemming from workplace issues could spill over into shared accommodation. Employment-related conflict was particularly impactful in instances:

- where employees lived with or near their workplace superiors

- when workers with differing shift schedules and lifestyle expectations coexisted in shared spaces.

Mismatched lifestyle expectations caused some tension, especially regarding noise and partying. To manage this, a blanket 10 pm noise curfew was implemented in Coral Bay. However, personality clashes and mess in shared spaces were also elements that drove conflict. In the context of Coral Bay, a worker explained:

> I don't want to live with any of the people that I work with, and I don't want any of the people that I work with to live together because I also think that you should be able to come home, and it's just a safe space to get away from it. (RCB5)

Intra-accommodation conflict could also have more serious consequences. A former Coral Bay worker detailed that after experiencing prolonged friction with a housemate, but being *'too scared to voice it,'* and reluctant to *'make a scene,'* they ultimately resigned and left the town altogether (RCB8). There was no crisis accommodation that could be used when conflicts in households require someone to leave.

In the Margaret River Region, conflict within accommodation usually arise independently of employment, except where workers choose the same accommodation but worked in different industries or on different schedules, which led to scheduling or lifestyle clashes. Other issues of conflict raised by workers in the Margaret River Region included:

- lifestyle conflicts (similar to Coral Bay)

- unsavoury behaviour by other residents

- conflict with the wider community (covered in subsection 2.3.6).

Mobile workers in New South Wales also reported some conflict within shared accommodation. Multiple workers reported having arguments or disagreements and, in some cases, *'things going missing'* (WN1).

Across all case studies, workers' accounts indicated that accommodation-related tensions persist unless there are effective mechanisms for addressing and resolving them. This highlights the importance of considering on-site management strategies, including, potentially, an on-site management presence (SCB3).

Health

Health-related issues can arise from accommodation practices, or be exacerbated by them. In Coral Bay, workers recounted experiences relating to issues of:

- mental health

- physical health and hygiene

- environmental hazards.

Multiple workers reported that the demands of their industry—combined with inadequate accommodation and a lack of separation between personal and work life—resulted in mental stress. Mental fatigue and poor mental health were both widely reported, exacerbated by a perceived lack of privacy. Alcohol consumption, often to excess, was common among workers as a way to socialise and manage stress (RCB4).

Figure 5: Workers' accommodation in Coral Bay that only exits into a central space

Source: Photograph by Tod Jones.

Alongside mental health and wellbeing concerns, issues pertaining to physical health and hygiene also surfaced in the worker experience.

In Coral Bay, bad water quality, from bore water, could have adverse impacts on skin and hair (SCB3). Inconsistent facilities across different accommodation types meant sanitation was a concern for some workers. Shared toilets, showers and laundry facilities in some accommodation led to discomfort and hygiene issues, and the spread of illness. Workers reported that COVID-19, flu and other illnesses would spread rapidly among workers (RCB5, RCB6).

For PALM workers in Victoria and New South Wales, health-related issues were closely tied to accommodation experiences. Across all regions, experiences with isolation, overcrowding, and lack of privacy contributed to physical and mental health concerns. Also critical was the lack of adequate cultural support: *'I know that they suffer from fatigue and mental health problems. They are more isolated than any other group of people from their family'* (SN4).

Remote or isolated accommodation arrangements contributed to social isolation, with workers facing difficulty accessing the services and connections vital for maintaining wellbeing and good mental health. PALM interviewees' reluctance to seek health services and medical care was due to costs and unfamiliarity with the system—both of which were exacerbated by physically isolated accommodation.

Environmental, weather and other hazards

While there are regional distinctions, workers across locations faced environmental and weather-related challenges in their accommodation.

In Coral Bay, the more temporary accommodation—caravans and portables—were most at risk of being adversely affected by weather events. Although rain is rare, Coral Bay is on the southern edge of cyclonic activity, and has experienced cyclones. Heavy rain often results in leaking—especially in older caravans (RCB8). Intermittent 'mouse plagues' also pose a health and safety risk. Dongas situated in extremely close confines, many with only one exit, pose a dangerous fire risk. One worker remarked that: *'Most of these caravans and stuff, if there's a fire, [the residents] are not getting out'* (RCB6).

In the Margaret River Region, fewer environmental hazards were reported, and workers were more likely to leave if conditions were unsatisfactory. Multiple workers expressed concern about inadequate heating in hostels. In winter, informal accommodation solutions like free camping become markedly less desirable, made difficult by frequent cold and rainy weather.

PALM workers in Victoria and New South Wales were primarily concerned with discomfort in periods of extreme cold or extreme hot. Some workers were unprepared for very cold weather and lacked adequate bedding and blankets. Numerous interviewees mentioned experiencing both cold weather and hot weather in inadequate housing (SV1-2, SN4, SV2-7, WN5). In 2022, PALM workers in V2 were flooded out of their accommodation due to widespread flooding in the area (SV2-6, SV2-7).

2.3.5 Relationships with host communities

Worker accommodation played a role in shaping the relationships workers had with their host communities. Tensions and acceptance varied across locations. Coral Bay posed a unique case: it is primarily a tourist town, so the workers technically function as locals, while visiting tourists are the outsiders.

In the Margaret River Region, tensions between locals and WHMS workers were exacerbated by the region's housing shortage. Locals and backpackers were *'pitched against one another'* in debates about housing (SMR10). Some locals adopted anti-seasonal-workforce sentiments, perceiving workers to be an inconvenience affecting an already tight housing market—rather than a necessary workforce. One worker detailed their friend's experiences with local hostility while seeking accommodation:

> *They posted something on the Facebook Margaret River group, and there were so many people who replied to them like, 'You're stupid. You're never gonna have a house, you backpackers.' They were insulting them. (WMR5)*

Limitations in available accommodation could result in backpackers camping illegally, or overcrowding private rentals, which increased their visibility in the region and could lead to further local resentment. Complaints about littering, environmental impacts, increased congestion and late-night noise from hostels could fuel negative local perceptions (SMR1). One worker reported feeling *'second'* to locals and tourists. The worker detailed a hostile experience in a caravan park where they were told to leave because it wasn't a *'gypsy camp'* (WMR5). However, other community members said that hostile attitudes were in the minority (SMR6). Box 3 demonstrates community attitudes in one of our case-study locations.[5]

In V1, housing pressures contributed to community tensions. As accommodation options such as motels were repurposed to house workers, some locals perceived the PALM workers as 'taking' essential housing stock (SV1-1). This perception, combined with the visible 'otherness' of PALM workers, can manifest in ill-feeling towards workers and a sense of competition for resources. In V2, PALM workers reported a generally positive relationship with their local community. Local church and community organisations made efforts to make workers feel more at home. Workers participated in sport like rugby and soccer. They also sang in the church choir, which led one worker to state: *'I feel like I am part of the community'* (WV2-2).

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5   We have not disclosed this case-study's location to protect the identify of those affected.

Across all locations, accommodation played a key role in shaping worker–community relationships. Where limited housing availability pushed workers into precarious or highly visible living situations—such as illegal camping, overcrowded rentals, or repurposed motels—tensions with the host community were likely to arise. This highlighted that having access to stable and adequate accommodation is the key for workers to maintain positive relationships with their host communities (and vice versa).

Box 3: Negative sentiment in a tourist region

In some instances, hostile, housing-fuelled, anti-backpacker sentiment manifested in dangerous behaviours. One worker stated:

I know that there's been issues with some locals especially. There's a group of young men I know that have caused a lot of hassle with some people that have free-camped. There's a lot of stories I've heard of people cutting off that little air valve on the tires—angry locals. That's happened to quite a few people I know well.

This sentiment is evidenced in online discourse. In one of our case-study locations, a police Facebook page reported 'multiple slashed tires […] in the early hours of Sunday' and requesting information. Some comments on the post condemned the people in the car park, rather than the tire-slashers:

Illegal campers camping where they shouldn't. Locals frustrated that the shire has no control over the situation and doesn't seem to care. Shit, piss and toilet paper everywhere. […] Maybe do the right thing and it won't happen.

Hopefully it was only [the] backpackers that set up camp in the surf-spot car park. […] Rangers care too much about a dog on the beach but not these scum, disrespectful tourists that treat the place like a tip.

Many community members were acutely aware of the value that workers bring to the community, and were concerned about minority attitudes toward backpackers. This was particularly apparent in the focus group, where broad concern about 'unwelcoming' locals was a key focal point. Focus group participants stressed that improving the accommodation situation was urgent and important, because otherwise it could continue to detrimentally affect community attitudes.

2.3.6 Social life and inclusion

Accommodation plays an important role in workers' social lives and sense of inclusion, with groups of workers having different social expectations of their accommodation.

In Coral Bay, accommodation played an important role in shaping WHMS and AS workers' social lives and sense of community, and we found no evidence of discrimination in worker accommodation. One worker described the town's social landscape as *'a really beautiful community … and really beautiful family vibes'* (RCB8).

In the Margaret River Region, WHMS workers often had specific social expectations, which could directly impact their choice of accommodation. Living with a diverse group of young people is a significant draw for many WHMS workers, who value the cultural exchange and sense of community. Accordingly, WHMS workers preferred accommodation that met these social needs (WMR3).

For PALM workers in Victoria and New South Wales, social connection is particularly important because of the distance from home. As one worker in V1 said:

> *As an immigrant who left my family to work overseas, one thing I appreciate is that Timorese workers are allocated together. This is helpful because we speak the same language and share similar cultural backgrounds. (WV1-5)*

Another worker raised the importance of living with those who shared similar lifestyles:

> *It would be better to have houses [that] workers can live together in, but this should be organised according to their lifestyles. Some men want to drink and go out and have some fun and some, like me, want to live quietly and not drink. It's hard when those groups get mixed up in accommodation together. (WV2-1)*

For other PALM workers, having accommodation that allowed colleagues, family or friends to visit was preferred. One PALM worker stated that moving out of employer-provided accommodation into a private rental greatly improved their social experience (WV1-8). Accounts across the locations reflected workers' desire for accommodation that fostered desired social interactions.

2.4 Comparing PALM, WHMS and AS worker experiences

Precarious accommodation is widespread among seasonal and vulnerable workers in regional industries. However, there are differing degrees of vulnerability according to the type of worker and their individual priorities.

PALM workers

PALM workers were particularly at risk of precarious housing and financial exploitation because of:

- their reliance on their employer for both work and accommodation
- their incapacity to change employment
- the language and cultural barriers they faced.

PALM workers were also vulnerable because:

- their mobility and access to services was likely to be restricted, with employers more likely to seek to control their mobility
- their accommodation was generally more crowded, provided poor value for money, and lacked amenities like storage and privacy
- they faced informal racial barriers to renting accommodation directly (as do WHMS workers).

PALM workers lived in crowded bedrooms, kitchens and bathrooms for many years, and often returned to these conditions. They also struggled to get responses to complaints, and were less likely to push for resolution of accommodation issues because of fear of eviction and deportation.

Privacy was a major issue for PALM workers, especially for communication with absent friends and family.

While these circumstances contributed to poor mental health, PALM workers were reluctant to seek health services and medical care.

PALM workers could form strong friendships with host communities through religious and sporting groups, but they also faced discrimination when seeking alternatives to employer-provided accommodation. A key factor differentiating PALM workers from other groups of workers was their motivation to remit money home and their aspiration to seek further long-term work in Australia.

WHMS and AS workers

In this section, WHMS and AS workers are considered together because they often:

- inhabit the same accommodation
- use social networks and online platforms to find work
- work and socialise together often.

Both WHMS and AS workers generally sourced their own accommodation, unless employers offered accommodation due to either remoteness or severe accommodation shortages. In locations with severe housing shortages, precarious and unsafe housing for workers was commonplace.

Precarious housing is seasonal in Margaret River—timed to the tourist and harvest season from late-autumn to summer—and is always the case in Coral Bay. WHMS workers and AS workers were concerned about the high cost of accommodation but were mobile enough to leave.

However, a key difference between WHMS and AS workers is that WHMS workers must satisfy their visa-renewal requirement for regional work before their visa expired. This could lead to WHMS workers remaining in poor and unsafe conditions to meet their visa conditions.

Accommodation facilities were poor for WHMS and AS workers in our study areas—particularly in hostels and caravan parks. Where there were severe shortages, relationship status becomes an issue for employers, but varied by region:

- Margaret River: most workers stay in hostels, so single workers were preferred
- Coral Bay: most workers stay in caravans and demountable buildings, and couples were preferred.

Precarity is an issue for WHMS and AS workers when there are severe accommodation shortages—with accommodation provision closely tied to employment.

WHMS and AS workers often socialised together where their accommodation became a social hub, and were less likely to join community groups. There were reports of poor relationships with host communities, particularly around the issue of illegal camping and when seeking private rental accommodation. However, our AS and WHMS respondents wanted good relationships with host communities and often interacted with them. However, they rarely stayed as long as the PALM workers—who stay for up to four years—and were often saving to finance their working holiday.

Regardless of visa status, longer-term workers have different accommodation requirements to seasonal workers. Long-term PALM workers had no storage and suffered from extended periods of overcrowding (for up to four years). Other long-term workers suffered poor health from overcrowding and inappropriate accommodation where there were accommodation shortages. A lack of privacy was particularly debilitating for vulnerable long-term workers in Coral Bay, where they often shared accommodation with staff they were managing.

Rural and remote locations exacerbated precarious housing conditions because of:

- issues accessing services—both by workers and for maintenance

- accommodation shortages

- greater reliance on employers to provide accommodation.

Remote agricultural work—which was undertaken by PALM workers in our New South Wales case study—was particularly isolating due to the distance from any settlement and the long hours worked.

2.5 Policy implications of current regional worker accommodation practices

The findings in this section extend the findings from Chapter 1, and establish an evidence-base for the policy recommendations in Chapters 3–7. Inadequate and expensive accommodation was commonplace among all worker types, and regularly failed to meet workers' expectations of safe and secure living conditions:

- From a worker perspective, affordability and value for money are key to the viability of an accommodation practice.

- Unsatisfactory conditions discourage workers from staying, which impacts workforce retention.

- Much worker accommodation is overcrowded—particularly for PALM workers and WHMS and AS workers in regions with severe accommodation shortages. Problems with facilities and maintenance can impact on worker health, safety and satisfaction. Hazardous conditions that increased worker's risk of exposure to health and environmental risks needs to be mitigated.

- Temporary and precarious arrangements are commonplace.

Workers' experiences of regional accommodation are structured through visa conditions, whether an employer or third party provides the accommodation, and accommodation supply and demand in a locality:

- Certain groups, particularly PALM workers, were disproportionately affected by high costs and crowding.

- Division between privately sourced and employer-provided accommodation creates disparities in access and conditions for different worker groups. Workers living in employer-provided accommodation had less agency and control over conditions in their housing situation.

- There is a need to ensure that accommodation practices and costs are fair for all workers, and do not disadvantage workers with less agency in their accommodation decisions—such as PALM workers.

There is evidence of discriminatory practices in access to accommodation, where ethnicity and poor English language skills have been used to exclude workers:

- Workers should not face discrimination in their accommodation experience—not at the hands of accommodation providers, nor from the host community.

Long-term and semi-permanent workers require stable long-term accommodation with different characteristics to seasonal workers:

- Workers' accommodation needs to cater for both seasonal and permanent workers. It also needs to be appropriate for specific groups—for instance, WHMS and AS workers seeking sociality; or PALM workers seeking a quiet place with privacy for regular communication with their family.

- Workers in long-term, managerial or semi-permanent positions were often neglected in discussions around regional worker accommodation—particularly in Coral Bay, where longer-term staff were housed in accommodation suited for short-term habitation.

- PALM workers who stayed for extended periods (up to four years) should be considered a semi-permanent workforce.

While all workers wanted good relationships with each other and the host community, there are tendencies and trends within the different types of workers:

- Social interactions and inclusion are key for WHMS and AS workers. Social aspects are also important for PALM workers—particularly religious and cultural inclusion.

- The importance of social dynamics signals the need for facilitating interactions between workers and the wider community.

Workers often lacked the knowledge and resources to navigate local housing and labour markets:

- There is a need for greater housing literacy, and stronger support networks to provide information and assistance for workers. PALM workers require greater support from community organisations and migrant services. AS and WHMS workers would like—and would benefit from—stronger relationships with host communities.

- Regional communications hubs for WHMS and AS workers could:

  - improve matching of supply and demand

  - provide accurate information on work and accommodation options—including contact details, timelines and rules or codes of conduct on camping and behaviour.

3. Visa conditions and regional worker accommodation

- While PALM workers and WHMS workers are vulnerable to exploitation, the PALMS visa rules that prevent workers from changing employers make PALM workers particularly vulnerable to precarious accommodation.

- PALM workers' displacement from their society and support networks also make them more vulnerable to precarious housing, and less likely to advocate to have accommodation issues addressed.

- Accommodation is used as a threat, and homelessness is an outcome, when PALMS employer–employee relationships break down.

- Simple and efficient processes need to be established so that PALM workers can change employers once initial costs have been paid off.

- PALM workers are likely to require additional support to ensure their welfare, their access to information about their rights to minimum working and living conditions, and advocates who can support them when reporting issues.

This chapter investigates how visa conditions interact with accommodation provision and worker vulnerability. While visa obligations make WHMS workers vulnerable, they have the choice to leave a poor workplace or accommodation. However, visa conditions tie PALM workers to one employer—which makes them:

- more vulnerable to precarious housing
- less likely to advocate to have accommodation issues addressed.

3.1 Existing research on visa schemes and vulnerability

The design and management of temporary worker visas in Australia has issues monitoring employment conditions and, where provided, accommodation standards. The fragmentation of responsibilities and the absence of a central point of coordination for all these initiatives results in a degradation of labour standards and an insecure and fragile labour force (Howe et al. 2019). The Fair Work Ombudsman reported that in 2019–20, migrant workers comprised 7 per cent of the workforce—but 44 per cent of new litigations (Berg and Farbenblum 2017). This is a structural outcome of the precarious position of migrants who are excluded from social services, have limited residence rights, and are over-reliant on their employer.

Experts concur that the PALMS policy of tying visas to one employer must change, so that workers can leave workplaces that may be *'exploitative, unsuitable—or even dangerous—without fear of reprisals'* (Petrou and Connell 2023: 133). Howe et al. (2019) concur that: *'Seasonal workers are vulnerable to exploitation arising from their limited labour market mobility and their desire to return in following seasons.'* More generally, Petrou and Connell (2023: 133) advise: *'Reform will require serious policy change that truly recognises guest workers as people rather than units of labour.'*

International experts we consulted agreed that tying migrants to a single employer was a key source of precarity, and a barrier to workers lodging complaints (IE1, IE3). The European experts reported that the European Union (EU) has been going through a process where visa schemes have been amended to reduce the dependence of non–EU seasonal workers on their EU employers, by allowing them to change employer (IE1, IE3).

The 2021 Australian Council of Trade Unions (ACTU) Congress pointed out the problem for workers of under-compliance and enforcement of regulations, calculating that the 17 full-time inspectors are responsible for 80,000 migrant workers (ACTU Congress 2021).

We found this understaffing was also the case for services offered to migrant workers by DEWR—specifically the PALMS Community Connections program. The staff member consulted for this study ostensibly supplied pastoral care to over 6,000 workers in Victoria (SV2-4). The same can be said for DEWR 'engagement' staff and other personnel responsible for overseeing regulatory compliance, along with Country Liaison Officers, who all appear to be overseeing such large cohorts of workers that providing adequate support and services becomes virtually impossible.

Underscoring this issue is that the workers we spoke to often have little knowledge of these services—or how to access them (WV2-2, WV1-3, WV1-5, WV1-6, WN4). One informant stated that while they were visited by a *'PALMS officer',* they *'didn't communicate due to the language barrier'* (WN4). Another informant advised that PALM workers often don't understand their contracts and face difficulty knowing where to seek help or lodge complaints, as key information is written mostly in English and is not deemed readily accessible (SV2-4).

In these circumstances, employers who recruit their own staff have little regulatory oversight. These workplaces provide little if any protections for PALM workers, who are often wary of approaching—or making any complaint to—welfare or safety officers or union officials for fear of losing their livelihoods, and who remain tied to their accommodation (as demonstrated in Box 4).

Improving coordination and workforce regulation can play a role in improving conditions for seasonal and vulnerable workers. For comparison, in New Zealand there is a national steering group that brings together important stakeholders and improves relationships between industry, government and worker representatives (discussed in Section 5.6).

Improving the regulation of labour-hire firms would influence many PALM workers, in particular. The federal government has promised—but not yet established—a national licensing body for labour-hire firms (DEWR 2023a). State governments are implementing reform. Queensland, South Australia and Victoria have established labour-hire agencies to regulate this sector.

Box 4: Accommodation and precarity

One young PALM worker interviewed for this study, Tobi,** told us how after feeling unwell and suffering from a blood nose at work, he was taken by his employer to the Emergency Department at a rural public hospital. In Emergency, he had to pay $700 for inconclusive tests.

PALM workers' private health insurance requires them to pay up-front, and then reclaim costs. However, workers often cannot afford to pay up-front and do not know how the claims system works. This was the case for Tobi, who could not afford the further tests required to diagnose him. As he still wasn't feeling fit enough for work, he was given an ultimatum by his employer: return to work, or resign and return home to his country.

As he considered what to do, his manager pressured him to leave, saying: 'You're not working now, so how will you pay for accommodation?' Tobi did not ask for sick leave entitlements, and they were not mentioned by his manager. Eventually, Tobi told his manager, 'I'll go back to my country,' and agreed to resign.

However, after recuperating in his home country, and still with a valid three-year visa, he returned to Australia and began working for another employer. Here he had a worse relapse, this time ending up in intensive care in another rural public hospital. Tobi was diagnosed with a brain tumour. With no income and in a precarious visa situation, Tobi is now being sheltered by a community member and receiving life-saving cancer treatment from a public hospital—treatment that is unavailable in his home country. (WV1-1)

(** not his real name)

3.2 Visa vulnerability and housing

Visa vulnerability and PALM workers

While visa vulnerability has a negative impact on working conditions, it also affects accommodation for PALM workers. Our own experience of approaching PALM workers for this study is that their precarity prevents them from openly talking about their experiences. Reliable relationships and networks are essential for PALM workers to address their vulnerability.

There was strong belief among PALM workers that if they voice dissatisfaction about their conditions (including housing), they would likely *'miss out on the next assignment'* due to being *'seen as a troublemaker'* (SV1-2, WV1-8). A community advocate stated that even when PALM workers are aware of their rights, they would rather have the complaint be made on their behalf, to avoid potential conflict (WV2-2). Employers are required to appoint a welfare officer for PALM workers, but this does not always occur nor operate effectively because of language and communication barriers. As one interviewee stated:

> *There's always a language barrier, especially because the way an average Australian from the country speaks English can be very hard to understand, and sometimes the workers just nod even if they don't understand. (WV2-2)*

Employers and labour-hire firms claimed that workers were able to discuss concerns with them. However, the issues they identified often did not align with the concerns communicated by workers. One advocate felt that labour-hire firms lacked literacy in cross-cultural relations and were largely ineffective at communicating with or understanding workers (SV2-4).

PALM workers are more vulnerable to poor accommodation standards than local renters because their current and future employment is tied to an employer who also provides their accommodation (SV2-7). When they do raise issues, the PALM workers we interviewed said that labour-hire firms did not consistently respond to their complaints or concerns (WV2-2).

In most cases, workers had little knowledge of official DEWR complaint processes or pastoral services apart from that offered by labour-hire firms, which they viewed as largely unresponsive (WV1-2, WV1-3, WV1-8, WV1-5, WV1-6). Local advocates for PALM workers say workers need more diverse avenues to discuss issues and concerns together (SN3, SN4, SV1-3, SV2-8). A religious leader from a Pacific country identified that traditional elders, who are generally responsible for leading communities, are missing from PALM worker communities, and thought they should be appointed and resourced (SV2-9). There is strong evidence that workers need more regular and stronger advocacy support, including greater empowerment to advocate for themselves, particularly given the restrictions imposed by their visa situations.

The issue of compliance and monitoring of housing standards is not unique to the Australian context. Two European experts interviewed stated that the main issues were around compliance and policing, and that fines (in particular for undeclared work or illegal employment) were the main deterrent (IE1, IE2). EU agricultural subsidies are increasingly tied to compliance with standards and there are discussions about including accommodation in this calculus for EU nations.

Visa vulnerability and WHMS workers

Visa vulnerability for WHMS workers was present, but differed to that of PALM workers. The requirement for WHMS workers to complete 88 days of regional work put pressure on workers either because:

- they were financially vulnerable due to low hours and the costs of accommodation and food (see subsection 2.3.2)

- they were running out of time to renew their visa.

While Barry (2021) documents the vulnerability and potential exploitation that can arise from these pressures, our interviews did not identify this in Coral Bay or Margaret River. However, it did lead to tensions between employers and workers who were asking for more work (SCB7). Employers also wanted to be able to extend WHMS workers beyond the six-month limit when there was a mutual desire for them to stay (WMR6, SMR3). Clearer and stronger pathways to longer-term and more permanent visas were mentioned for both PALM and WHMS workers.

3.3 Informed consent for workers' accommodation

Workers all received pre-departure briefings (PDBs) from home country representatives (labour sending units [LSUs]) and employers or labour hire providers (LHPs). Initial briefing occurred in home countries with more to follow on arrival in Australia. Workers reported being pressured to sign new documents that were not in accordance with contracts signed in their home countries. One worker explained that despite their LSU advising against signing the contract, many workers signed because they were *'scared that they might not return to Australia'* (WN5). Another worker explained that many of their colleagues signed contracts in English in their home country when they could neither speak or read English sufficiently (WV2-2). The worker explained:

> *Most people were only thinking about going to Australia, that's all they think about, they sign the contract. But they had no idea, they didn't know what they were signing and then when they come over here they face the reality of what is in the contract. And then they start to complain but then it's too late, they have already signed the contract. (WV2-2)*

In our national PALM workers' focus group (FNAT), some workers informed us that everything about their accommodation was just as it had been described in their PDB:

> *They provided us with detailed information, including our residential address and the costs we would incur. They informed us that on a weekly basis we would need to pay a certain amount. (P16-FNAT)*

A colleague added:

> *We live in company-provided accommodation, where each of us has our own room. Our rooms are equipped with various facilities, including a television, sound system, and fridge—each person has these amenities in their own room … I would say that we live in very good accommodation. (P7-FNAT)*

However, for others this was not the case. There was a lot of confusion about what fittings, furniture and facilities should come with accommodation, with suppliers not answering complaints effectively (FNAT). Accommodation standards are not clear to workers and in many cases are not explained clearly to them before they depart or during their time in Australia. It is crucial that workers are provided with clear, detailed and accessible information as part of the broader visa conditions—both before departure and throughout their time in Australia.

3.4 The international relations impacts of the PALMS

There is a view among some representatives of PALMS participating countries who have been sent to Australia to investigate aspects of the scheme that their country is not regarded by the Australian Government as an equal partner. Country representatives (including trade union officials and other advocates) have reported *'systemic issues'* with several employers and labour-hire companies—with the example of Agri Labour Australia being the most egregious (ABC News 2018). The high priority from their perspective was *'critical incidents'* (or workplace-related deaths), which had more than doubled in 2022–23.

Country representatives also emphasised other issues related to worker wellbeing, such as *'substandard, overcrowded and overpriced accommodation'* (pers comms). Diplomatic staff from PALMS participant countries spend significant time and resources seeking to ensure their citizens are safe and treated properly. The industry dynamics were of concern to country representatives; remittances of $184 million between July 2018 and October 2022 can be compared with wages of $434 million and profits of $289 million (Shilito 2022). Country representatives were also concerned about Australian Government regulation of PALM workers, given the money it receives from superannuation deductions, visa fees and workers' tax contributions (pers comms.).

Country representatives have made recommendations to reduce migrant worker vulnerability and precarity. At the structural level, they hope that Australia will:

- ratify the UN Convention on the Protection of the Rights of All Migrant Workers

- change any legislation that does not comply with the UN Convention

- add anti-slavery and forced labour clauses to the PALMS Deed.

There is also a strong case that workers should have access to basic Medicare. Country representatives also support measures already discussed in this report:

- including a legal right to change employers

- enforcing visa and workplace safety rules

- improving advocacy processes

- increasing housing literacy among workers.

This is a growing source of international tension for Australia's near neighbours. As one stakeholder observed:

> *From a soft-power perspective, the mismanagement of the program within Australia is beginning to have very negative implications for our strategic relationships in the region. (SN2)*

Another interviewee recounted a popular Fijian song titled *Ilavo ni Aussie Ilavo Mosimosi* (meaning 'the Aussie dollar is a hard dollar') reflects the 'tough time' experienced by workers participating in the PALM scheme (SN2).

3.5 Policy development for visa conditions

The key change to address the structural causes of vulnerability is to establish simple and efficient processes so that PALM workers can change employers once initial costs have been paid off. While this is a key measure, other steps should also be taken:

- Workplace and migration laws could be strengthened and better enforced to deter exploitation. This would entail adequate resourcing and staffing of the agencies that enforce compliance: the Fair Work Ombudsman, DFAT and the DEWR.

- To guard against exploitative employers, extend the Fair Entitlements Guarantee (FEG) scheme to migrant workers.

PALM workers need independence advice, representation and advocacy:

- Community service organisations like the Victorian Migrant Workers Centre need better resourcing in each state, along with increased funding to community legal centres.

- Employer-provided accommodation needs to be more intensively monitored for compliance with clear guidelines and local laws. Country representatives should be invited to attend monitoring visits, and unions should be allowed to make unannounced monitoring visits.

- Confidentiality should be ensured for PALM worker reporting issues, and there should be regular inspections and access to cultural mediators. Contact information for supporting organisations should be provided to PALM workers.

Due to the regulatory barriers to changing employers and therefore accommodation, PALM workers require a higher level of informed consent about their accommodation:

- Workers should be given accommodation regulation checklists in their own languages in pre-departure processes so they know accommodation standards.

There should be a scheme for employers to apply for extensions for excellent staff on PALMS or WHMS visas that can ultimately provide a pathway to permanent residency.

4. Standards for regional worker accommodation

- Standards for regional worker accommodation depend on visa regulations, planning schemes, accommodation regulations and accommodation management.

- Profit-seeking in the provision of PALMS accommodation—in contravention of its requirement to be provided 'at cost'—risks distorting regional housing markets, and is contributing to poor outcomes for PALM workers.

- The PALMS accommodation provisions should have two standards: one for seasonal workers, and one for workers who stay over 12 months (and up to four years).

- Housing literacy is poor among seasonal and vulnerable workers. Information should be provided in their accommodation and through supporting groups about accommodation standards and how to have issues addressed.

- Federal and state governments should ensure that employers and accommodation providers comply with existing regulations for lodging houses (Western Australia), rooming houses (Victoria) or boarding houses (New South Wales).

- There is a case for state regulation of employer-provided workers' accommodation through a model code developed by Safe Work Australia.

This chapter considers the complex legislative environment that regulates accommodation provision as it relates to seasonal and vulnerable workers.

Legislated minimum standards vary depending on the visa and type of accommodation. PALM workers are the only sub-group of workers where accommodation provision, including standards, is regulated based on visa status.

For all other workers, accommodation provision is regulated through state legislation and is shaped by both the dwelling type and location. This chapter draws findings from the interviews and focus groups to explore the extent to which workers understand their rights, before analysing how the accommodation standards set by the legislation are:

- delivered in practice

- result in some unintended consequences.

4.1 Guidelines for regional worker accommodation standards

4.1.1 Mandatory accommodation standards for PALM workers

The Pacific Australia Labour Mobility Scheme: Approved Employer Guidelines (DEWR 2023b) was updated in November 2024. It sets out the responsibilities of employers in relation to the recruitment of PALM workers, employment conditions regarding minimum hours and pay, work health and safety as well as welfare and wellbeing and—importantly for this research—the minimum standards for employer-provided accommodation (DEWR 2024).

Table 8: Mandatory accommodation standards for PALM workers under the Approved Employer Guidelines

Housing costs	
Fair and good value	Rent must be good value for money relative to the location, and be affordable relative to their income
Security bond	May be recovered within reason from employees' wages
Transparency of all costs	Transparency to the department and the employee: includes rent, bond, utilities and cleaning
Dwelling attributes	
Fit for purpose and in good condition	The home must be able to be moved into immediately, be maintained, have an adequate water supply for drinking and cooking, and a hot-water service
Accessibility, safety and security	Secure storage for personal items, clothes and food; a lockable door on each bedroom and bathroom; appropriate window coverings; individual lockable storage for valuables; well-lit access areas, living room and bathroom
Sleeping quarters and arrangements	For each worker a bedroom that is not overcrowded or set up in open living areas; a separate bed: a comfortable, clean mattress and pillow; two sets of linen, and doona or blanket. Walking space between beds, fixtures, furniture and exits
Bathroom facilities	Provide for every 10 workers at least one toilet, handbasin and shower. Facilities to be permanent and conveniently located
Leisure, social and communications facilities	Social and rest spaces for all tenants, clean furniture in good condition; affordable communications options with their home country either phone-based or internet-based

Adapted from DEWR (2023b).

Employers are required to submit an Accommodation Plan for all new employees that complies with the guidelines and state, territory and local government legislation (DEWR 2023b). The Accommodation Plan must respond to the minimum standards and deliver housing that is safe and secure, and fit for occupation (DEWR 2023b). The guidelines go further, providing mandatory requirements that provide guidance around the housing costs (including affordability), the dwelling attributes and additional responsibilities of the employer, as listed in Table 8. Fire hazards in accommodation are addressed through compliance with existing guidelines for buildings, although there is a separate obligation on employers to ensure that workers remain safe in Australia—including safe from fire and other risks (see DEWR 2023b: 68).

4.1.2 Safe Work Australia

Safe Work Australia (2020) has a model Code of Practice for managing the work environment for workers in regional and remote areas. The Code recommends a vague minimum, without many concrete measures regarding the number of people in sleeping quarters, per bathroom or per kitchen (see Appendix 7). There are state expectations that adhere fairly closely to the Safe Work Australia guidelines for workers' accommodation outside of townsites and the metropolitan area.[6]

In Western Australia, problems with mining accommodation led to the development of a position statement on workforce accommodation. This position statement clarifies that the Planning and Development Act gives local governments the ability to control the location and standards of workforce accommodation through its planning scheme and other local planning instruments. These should be within a town and integrated with town services. This is an effective way for local government to direct and set standards for workforce accommodation.

4.1.3 Additional accommodation legislation for seasonal and vulnerable workers

Some workers in insecure accommodation are either lodgers or boarders who stay in so-called boarding, rooming or lodging houses provided by their employer or by a third party. All states prescribe minimum standards for this type of accommodation, and require registration with local government—although the definitions vary between states (see). There are differences among these types of accommodation:

- Boarders get meals or extra services (such as linen, cleaning provided), while lodgers do not.
- Lodging houses (Western Australia), rooming houses (Victoria) and boarding houses (New South Wales—henceforth all referred to as 'lodging houses') provide lodging and other services for paying guests who generally share facilities and who have an individual agreement with an operator. Hostels are regulated through this legislation. (See Table 9)

Not all accommodation for seasonal and vulnerable workers falls under lodging regulation, as a minimum number of lodgers is required before lodging-house regulations apply. However, there are additional standards for lodging houses due to issues with management, crowding, sanitation and fire safety.

Existing local laws in most jurisdictions provide local governments with the power to apply lodging-house legislation. This allows local governments to:

- require registration of lodging houses
- assess applications for their registration, ongoing management and inspection
- investigate complaints about lodging houses
- charge a fee for such services.

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6 In Western Australia, the Department of Energy, Mines, Industry Regulation and Safety provides a checklist that was last modified in 2016. https://www.commerce.wa.gov.au/worksafe/employer-provided-accommodation-and-duty-care

Applying the lodging-house legislation would apply a much greater level of oversight—particularly to PALMS accommodation—and guarantee a higher level of safety, particularly relating to fire risks.

Table 9: Regulation of 'lodging houses' in the case-study states

State	Western Australia	Victoria	New South Wales
Terminology	Lodging house	Rooming house	Boarding house
Legislation	*Health (Miscellaneous Provisions) Act 1911*	*Residential Tenancies (Rooming House Standards) Regulations 2023*	*Boarding Houses Act 2012*
Differences in definition	6 or more lodgers	4 or more lodgers	5 or more lodgers
Purpose	Ensures minimum standards and administrative requirements for short-term accommodation in townsites and metropolitan areas. Local governments administer lodging houses according to state legislation		

Source: compiled by Authors.

4.1.4 International regulations for worker accommodation

As in Australia, EU directives oblige member states to legislate minimum standards of accommodation for seasonal workers and monitor accommodation standards (European Migration Network 2020). EU countries impose a similar set of obligations on employers as Australia. Most EU countries have minimum standards for sanitation, safety, basic facilities (food preparation, sanitation), drinking water, electricity and heating.

However, unlike Australia, many EU countries also have a minimum habitable size per person, which varies from four square metres (Spain) to 14 square metres (Italy and Croatia), with most around seven square metres.

Like Australia, accommodation costs and arrangements need to be transparent and documented. Malta and Lithuania require that the monthly rent is not more than a third of the workers' monthly wages (European Migration Network 2020).[7]

4.2 Comprehending accommodation rights

Knowledge about the Employer Guidelines and the accommodation rights of workers was explored through interviews and focus groups with PALM workers and other stakeholders. PALM workers were asked:

- if they were aware of the accommodation standards that applied to their accommodation
- if they understood what action could be taken if the accommodation provided contravened the guidelines.

One of the key findings was that information about accommodation, the responsibilities of the employer, and their rights as tenants, was provided in English. During the focus group for PALM workers, it was explained that as a result of the language barrier, the information was not understood by all workers. This comprehension barrier occurred both before PALM workers signed their contracts, and after they arrived in Australia. One worker suggested: '*What I think is best is if the Australian Government … work with our government to get our people more properly informed*' (WV2-2).

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[7] In a parallel to Australia, where minimum standards are only specified for PALM workers, minimum rights to accommodation are only available to workers from non-EU countries. However, workers from EU countries have a right to adequate housing with specified minimum standards under the Charter of Fundamental Rights of the European Union.

An example of the extent to which PALM workers understood their rights and responsibilities was found in relation to the wage deductions to pay for accommodation. Where an employer is providing housing for a PALM worker, rent and other associated accommodation costs are deducted directly from the worker's pay. As the following worker explains, this process is not well understood, and would benefit from greater up-front transparency about the nature of these deductions:

> *A lot of us before we came, we think of coming to Australia, we think of making money, saving money, so that's what everybody expects. And then, there is a lot of hidden costs that they never tell us on the other side that we face here … when we come here, those bills come in and we didn't expect them. (WV2-2)*

A related finding is that where accommodation provision does not meet the standards set by the guidelines, there was a lack of knowledge regarding the procedure required to resolve issues. As one PALM worker explained during a focus group: *'Even when workers are aware that their accommodation doesn't seem to meet standards, they do not know where to go with this information, how to get this information sorted'* (P3-FNAT). PALM workers across all case-study locations generally did not understand how to make complaints about substandard accommodation.

Where workers are staying in caravan parks, their accommodation is regulated through the relevant state act for caravan parks.[8] These acts and regulations set standards and rules for accommodation, and regulate the length of time people, including workers, can stay. The building code of Australia, applied through state legislation, also applies to workers' accommodation.

EU experts also identified the lack of seasonal workers' awareness of their rights, including in terms of accommodation in their countries. These experts advised that more work is needed to create informal mechanisms to reduce isolation and barriers to awareness. They argued it is important to complement the legislative tools as isolation, lack of networks, and lack of information are major sources of seasonal workers' vulnerability. Current discussions in Europe are seeking to ensure access to contacts, and to provide information to help workers understand and advocate for their rights.

Workers' accommodation standards are set by the guidelines and legislation at federal and state levels. An individual regional worker, when moving between homes, will find themselves subject to more than one piece of legislation. Knowledge about housing rights and responsibilities, including an understanding of how to resolve housing grievances, is generally poor for seasonal and vulnerable workers. This knowledge is referred to as 'housing literacy'—which is the extent to which households understand the housing system, and can use that knowledge to make future housing decisions (Stone et al. 2020).

Stone et al. (2020) found housing literacy was low for lower-income households who lacked access to complete information about their housing options. A recent study recommended an information hub to assist older Australians (James et al. 2022). This approach is also applicable to seasonal and vulnerable workers, where information channels are often lacking.

Standards and processes are also likely to improve if grievance procedures are provided in regional workers' accommodation—and in the workers' language. In these situations, workers with strong networks or who can contact community groups or regulators such as PALMS support services, unions and labour-hire regulators, are less vulnerable and more likely to advocate for improvements.

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8   In Western Australia, this is the Caravan Parks and Camping Grounds Act 1995; in Victoria, the *Residential Tenancies Act 1997*; and in New South Wales, the Local Government Act 1993 and *Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation*.

4.3 Accommodation standards in practice

4.3.1 Employer-provided housing in the private rental sector

It was revealed during interviews that some labour-hire agencies are working with local property managers to secure housing in the private rental sector to house their employees. As one housing advocate explained:

> What I think we've witnessed in our Shire is that [Labour-hire agency] are managing to somehow access accommodation, or they've expropriated accommodation that was there for general community or crisis transition housing. And then they've managed to, well, they seem to be able to access rentals that other people haven't managed to access. (SV2-7)

It was explained that this was of benefit to labour-hire agencies, as more workers could be accommodated in these dwellings than in other accommodation options. Landlords may also be interested in this arrangement, given the potential long leases and guaranteed incomes that a secure tenant would offer.

As discussed in subsection 2.3.2, PALM workers who directly rent from landlords have accommodation with lower costs and greater amenity—but this was not the case for homes leased by the labour-hire agency in V2. These findings raise questions about the extent to which the housing provided to PALM workers by the employers is meeting the 'fair and good value' mandatory standard in the guidelines. In other words, the cost being charged for employer-provided accommodation is too high relative to the local market rates based on the quality. There may also be implications for the broader community.

Such practices are effectively removing private-rental-sector housing supply from an already tight rental market—which may influence rents more generally.

4.3.2 Are the standards for seasonal and vulnerable workers appropriate?

The Mandatory Accommodation standards apply to all PALM workers, regardless of whether they stay for nine months or four years.

While the standards are designed to provide accommodation scenarios that are liveable, the experience of workers indicates that privacy is limited and accommodation is overcrowded, with up to 10 people sharing cooking and ablution facilities. The scenario may have an impact on their wellbeing while in Australia (Department of Health WA 2020).

The Employer Guidelines would not meet recommended minimum standards for farm workers. For instance, the 2023 Fair Farms standards recommend:

• two people or less in each room, or

• each occupant having at least 5.5 square metres of floor space in sleeping quarters.

In addition, there are recommendations for revised lodging-house legislation in Western Australia that allocate 6.5 square metres per person.

With these alternative standards in mind, are the living conditions provided by the Employer Guidelines fair and appropriate for PALM workers who are staying as guests in Australia—particularly for those staying up to four years? There is a strong case for having two sets of standards for accommodation in the PALMS Employer Guidelines for workers for the different lengths of stay: under nine months and over 12 months. For example, it seems reasonable to argue that workers who are in Australia for more than 12 months should have their own room and share facilities with fewer people.

4.3.3 Enforcement of standards

The application of standards suffers where there are structural failures in the housing market.

Among the three case studies, this structural failure is clearest in Coral Bay, where business owners are staying in caravans to accommodate their staff adequately (RCB2, RCB3). Permanent regional workers are staying in accommodation designed for seasonal workers, and struggle to find storage appropriate for their possessions.

Applying legislated standards would lead to severe staffing shortages, and this has been the case for decades. Situations like this can only be addressed through a coordinated approach between local and state government that strategically applies standards and penalties where they will improve accommodation outcomes and work together with local business organisations to deliver appropriate accommodation (see Chapter 6).

For instance, in Coral Bay standards could be enforced with penalties for employers who own land, as these employers have the financial capacity, land and planning settings to invest in accommodation. However, employers who do not own land have higher and longer-term barriers to providing adequate worker accommodation.

4.3.4 Call for a national code

The most immediate way to improve standards would be through the application of the appropriate lodging-house regulations that already exist in each state. Some states, such as Victoria, also have provisions about providing information to workers about the standards they should expect and how to get them enforced.

Our interviews and conversations indicate that local government officers are likely to resist this role due to the extra workload it will generate (FGMR6). There is a fee structure for this work, although it may need to be revised to cover the costs of increased regulation.

Given the complex legislative environment that delivers and enforces accommodation standards for workers' accommodation, there is a case for a national model code for employer-provided worker accommodation that could be legislated by state and territory governments.

A Deloitte report (2022: 10) on accommodation for horticultural workers recommended that, due to the vulnerability of workers and highly variable costs and quality of accommodation, there needs to be a *'single enforceable standard for accommodation provided by horticulture industry stakeholders, with consequences for noncompliance'*. A minimum standard for all employer-provided accommodation would need to be legislated to be effective. It would not cover workers who stay in caravan parks, hostels or third-party-provided houses, but it would assist many PALM, WHMS and AS workers who are currently vulnerable to precarious housing and unequal power relationships in regional industries. It would also provide an appropriate benchmark for third-party-provided worker accommodation.

4.4 Policies for improving the standards of seasonal and vulnerable workers' accommodation

Accommodation for seasonal and vulnerable workers needs to be suitable for adults working in hard, physical jobs. As highlighted throughout this report, cramped accommodation does not supply workers with adequate privacy and rest. It seems reasonable to request legislation to help avoid accommodation becoming an opportunity to charge workers above-market rates for substandard accommodation.

More specifically:

- There should be a new standard for PALMS employers for workers that are staying over 12 months that provides them with a room, adequate storage, and the privacy and means to maintain contact with their families and social network.

- The current standard should only apply to seasonal PALM workers and should be revised to also include space provisions (6.5 square metres per person), a maximum of four people per room, and a private space for talking with family members.

- Standards for PALM workers need to provide more detailed and clear guidance on the cost of accommodation, in particular ensuring a comparison between household rates as well as individual rates.

Housing literacy and social networks are very important for ensuring that workers are not exploited and that workers are able to enforce minimum standards:

- Standards for minimum room size, maximum occupancy, and fittings and faculties per adult to be provided to workers in languages they can understand.

- Processes for how to lodge a complaint to be provided to workers in languages they can understand.

- The compliance and monitoring recommendations (from Chapter 3) are important for ensuring accommodation standards are known and met.

- Providing opportunities for workers to develop local networks helps ensure they can:

    - access information on accommodation standards

    - advocate for themselves when issues arise.

- Unannounced audits should be made to ensure standards are maintained.

There is little regulation or knowledge of arrangements for workers who are lodgers in rental accommodation provided by employers:

- State governments should direct local governments to require employers to apply lodging house (Western Australia), rooming house (Victoria) or boarding house (New South Wales) regulations and comply with local and state laws for the management and standards of their premises—including information provision.

- The federal government should require registered PALMS employers to comply with regulations for lodging houses (Western Australia), rooming houses (Victoria) or boarding houses (New South Wales), including registration with local governments, management of premises and information provision.

New standards should be considered by state governments:

- Safe Work Australia should develop a national model code for employer-provided accommodation, with a greater and more appropriate level of detail that would set a legislated minimum standard for employer-provided accommodation.

5. Stimulating supply for worker accommodation

- The main barriers to private development of workers' accommodation are the cost of land and construction, and investment returns. These barriers are particularly high for small- and medium-sized enterprises (SMEs). Other barriers are competition for residential housing stock, accessing empty or underutilised accommodation, and land constraints.

- The need for permanent workers' accommodation is pressing in regional Australia, although seasonal worker accommodation is also required. This highlights that diverse housing responses are required.

- State-level planning and regulation can assist by zoning land for workers' accommodation, regulating short-stay rental accommodation, and imposing a vacant land tax.

- Public programs should encourage multi-business accommodation facilities. Such facilities reduce costs and risks, are more accessible for SMEs, and fit well with the priorities of government housing programs.

- Leveraging public support to form collaborative partnerships may be required to make purpose-built worker accommodation viable. Businesses need information on special purpose vehicles for providing multi-business facilities.

- State-government support can increase development viability through programs that:

  - prepare land and secure co-investment

  - provide land-lease arrangements

  - provide a clear pathway including land and objectives

  - provide incentives to refurbish and repurpose ageing building stock.

All case-study locations suffered from a deficit of safe and secure accommodation for seasonal and vulnerable workers. This chapter analyses initiatives to provide more and improved workers' accommodation. It addresses:

- current approaches and issues
- barriers to innovative practices
- policy changes that can support innovative solutions appropriate for local contexts, workers and employers.

The chapter primarily draws from interviews and focus groups in Margaret River and Coral Bay, supplemented with findings from Victoria and New South Wales. There is little existing research on initiatives for workers' accommodation, and a need for a greater research focus on effective and innovative models and pathways.

5.1 Research on increasing the supply of worker accommodation

As reviewed in Chapter 1 and summarised in Table 3, there are a variety of public grant programs to support accommodation for seasonal and vulnerable workers.

There is a trend across all case-study states for local government to play a greater role in the provision of regional worker accommodation—despite resistance from local governments. An interview with the administrators of Western Australia's IDF Stream 3 grant (SCB8) indicated that the capacities of local governments to apply for and deliver worker housing differed greatly, and there is a need through these processes for capacity building. These programs are opportunities to build partnerships to deliver regional worker accommodation.

There are different models for public-private partnerships emerging.

A recent feasibility study for worker housing in the Wheatbelt region of Western Australia demonstrated strong need, a large number of quantifiable benefits—and market failure, which is where the cost of building exceeds the sale value. A cost-benefit analysis made a case for state funding for local-government-led accommodation development (Shire of Wagin 2024).

A similar situation in the Victorian town of Murtoa led to the proposal to develop a special purpose vehicle (SPV)—where local shareholders invest small amounts each, such as $10,000. The aim of the SPV was to raise equity for loans alongside grant applications to build worker accommodation to address a pressing need in a similar case of market failure (Wimmera Housing Innovations 2023). Depending on the specific model chosen, the housing was forecast to return its investment in an eight-to-10-year period.

Our case-study locations are experiencing a different kind of housing market failure—where affordable worker housing is unable to generate comparable returns to residential or short-stay tourist housing. A case in point is the Margaret River Region, where there is a significant gap between the average rents and the wages paid to seasonal and junior workers in the agricultural and hospitality sectors. There is some market adaptation, with an increasing number of providers paying above-award wages to essential workers who are vulnerable to precarious housing.

Internationally, Perry's (2018) analysis of bunkhouses on farms in Canada highlights the dangers of entrenching poor accommodation. Bunkhouses are a growing industry. However, they are not designed as places to socialise, gather or live a dignified life. Instead, they *are designed solely to warehouse workers temporarily until the end of their contracts, thereby entrenching the regulatory immobilization of migrant farm workers'* (Perry 2018).

A positive international example of a successful initiative to develop multi-business accommodation is the Wisconsin Dells International Residence Hall in the USA (see Box 5). Multi-business models address cost and risk issues that can prevent SMEs from investing in workers' accommodation.

Box 5: Multi-business accommodation example: International Residence Hall in Wisconsin, USA

Large water parks in Wisconsin employ international students for their summer breaks. The students arrive in large numbers and were being accommodated inadequately in hotels and guesthouses. The local government used a local premium-resort tax and a loan to generate a $US750,000 investment for a private company to develop an international residence hall where each student has their own bedroom and shares the other facilities. The take-up of residence halls has expanded considerably, and the company now provides a number of similar halls across the USA (Traylor 2017). An international expert we consulted viewed this model as a good way for small and medium operators to access workers' accommodation (IE3).

5.2 The effects of worker accommodation shortages on regional businesses

Our focus groups and interviews confirmed that lack of appropriate workers' accommodation was restricting business growth and development. Here we briefly present evidence of the effects of the workers' accommodation shortage.

In Coral Bay, multiple employers (SCB6, RCB4, RCB3) confirmed that required staff had left due to their accommodation. And accommodation is causing staff recruitment and retention issues in the Margaret River Region, according to a senior business manager:

> *We have definitely lost employees because of accommodation, or just had people pull their applications because we couldn't guarantee them a place to stay when they got to Margaret River. (SMR9)*

While Coral Bay and the Margaret River Region are struggling with permanent staff, in V1 accommodation was restricting the recruitment of seasonal staff. While employers viewed the cause of employee dissatisfaction at the standard of the accommodation, a worker we interviewed left because of the accommodation shortage. When they were clashing with a flatmate, they left because there was no appropriate alternative accommodation (RCB8).

The tourism and agriculture industries are affected in two ways:

First, the lack of accommodation is increasing their costs. Businesses are now either purchasing accommodation (SMR9) or increasing salaries. One Margaret River Region business owner stated that business has '*to pay way above the award because staff are having to pay huge rental costs […]. It doesn't seem to be sustainable*' (SMR10).

Second, business are unable to take opportunities due to the lack of available staff. This was particularly apparent to a Coral Bay business owner:

> *We'd love to take on a shop and have a shop going too, but there's no accommodation for the [workers] … so there's no expansion of businesses. There's lots of other opportunities to grow around town, but without staff you can't grow. (RCB3)*

This impacts both existing businesses and new entrants to the region, with at least one business entrant in Coral Bay unable to enter the market due to a lack of staff accommodation (SCB1).

5.3 Barriers to innovation in workers' accommodation

Changes in housing markets in tourist and tree-change destinations like Margaret River and, to a lesser degree, V2, are reducing the stock of available rental accommodation.

International research has shown that growth of short-term holiday rental accommodation and holiday homes contributes to increasing rental and house prices (Benítez-Aurioles and Tussyadiah 2021; Segu et al. 2020).

Interviewees in the Margaret River Region felt that short-stay accommodation was impacting housing availability, but also denied it was the predominant factor (SMR13). Other barriers are:

- ageing building stock in regional areas where older tourist accommodation has above-average vacancy rates

- second homes that are often vacant or rarely utilised.

In Margaret River, these trends contribute to increased competition for rental housing while other accommodation might remain underutilised.

Focus groups in Coral Bay and the Margaret River Region both identified land availability and costs as barriers to new worker accommodation. Coral Bay had 33 hectares zoned for workers' accommodation, but this was changed to three hectares zoned for workers' accommodation only and 30 hectares zoned for workers' accommodation and holiday homes. While this does not prevent the land being used for workers' accommodation, the return on—and value of—holiday homes far exceeds that of workers' accommodation. The planning setting has worked in the three dedicated hectares with two lots now functioning as workers' accommodation. This is an example of how planning settings can encourage or impede investment in workers' accommodation.

Cost is a major barrier to the development of workers' accommodation. Similar to affordable housing (Gurran et al. 2018), there is an imperative for workers' accommodation to retain its function and affordability, reducing its market value and return on investment, which discourages private providers.

Some large employers in case-study locations in Western Australia and Victoria are investigating—or have already financed—their own workers' accommodation. In Coral Bay, RAC purchased land and built new accommodation. This was done as part of a path-creation strategy, where retaining trained staff will allow them to deliver a better service and avoid the costs of constant retraining (SCB3). Small- and medium-sized employers are unable to make large housing investments because of:

- the risk of overcapitalisation (SCB4)

- the lack of a critical mass of workers (SMR3).

Both deficits could be overcome through cooperation between businesses:

An issue unique to Coral Bay is the current land-lease arrangement. Businesses lease small parcels of land at the back of a caravan park for their own mobile accommodation on a monthly periodic tenancy. Such a lease arrangement makes:

- investment in this accommodation unlikely

- loans to improve accommodation impossible (RCB3, RCB4).

Despite these barriers and risks, the focus groups in these two locations indicated a strong willingness to invest if longer-term solutions to these problems were possible.

5.4 Increasing the availability of existing workers' accommodation

We asked focus groups in Coral Bay and Margaret River to consider ways to increase the availability of existing workers' accommodation. This was most relevant in the Margaret River Region, as it had a wider range of options available than Coral Bay.

While participants' preference was for new workers' accommodation, participants ranked taking steps to address the high proportion of holiday rentals and holiday homes equal fifth of 20 options. (Holiday rentals and holiday homes currently make up to 30 per cent of the housing stock in the Margaret River Region.)

Western Australia's recent regulation of holiday rentals is aimed at unhosted short-term rentals that exceed 90 nights in a 12-month period. It provides a model that combines:

- information collection
- clarity in planning provisions
- development approval (Government of Western Australia 2024c).

A related initiative in Victoria would address vacant residential properties in regional locations. Victoria's vacant residential land tax (SROV 2025) increases the tax on:

- existing homes that are vacant for more than six months in a calendar year
- residential land with a home that has been under construction or renovation for two or more years
- residential land with a home that has been uninhabitable for two or more years.

This tax was applied in inner and middle Melbourne from 2018 until 2024, and from 1 January 2025 applies anywhere in Victoria (with some exceptions). The additional tax starts at 1 per cent of total land value, and increases 1 per cent a year to 3 per cent.

The other fifth-ranked option in the Margaret River Region Focus Group was to increase the availability of existing supply through retrofitting existing accommodation—such as ageing tourist accommodation.

Box 6: Repurposing accommodation in New Zealand

In 2018, Thornhill Horticulture Contracting purchased the Angus Inn Hotel in Hastings, New Zealand. It transformed the hotel into a 312-room site to house its Pacific seasonal workforce. The accommodation is alcohol-free and has 24-hour on-site management. In 2020, for $NZ130 a week, workers received access to a bed and linen, and weekly laundry and cleaning services. Three daily meals were available for an extra $NZ13.50. This was part of a broader sectoral commitment of $NZ45-million to build 1,500 new beds for its seasonal workforce (Horticulture NZ 2020).

However, the lower return on investment from workers' accommodation is a barrier. Discussions in Margaret River constantly hit this wall when considering private investment in workers' accommodation (SMR9). We consider this barrier in Section 5.5.

Labour-hire firms for PALM workers have experienced more success. In the New South Wales town of Tamworth, employers had taken the initiative and invested in a pre-existing hostel and used it exclusively to house PALM and other seasonal workers (SN7). In Casino, adaptive reuse of disused school buildings and former council offices was seen as a cost-effective short-term solution to housing shortages (SN3). Another option used in Victoria was renting student accommodation during periods of low demand (SV1-1, SV2-3).

Another pathway to unlocking workers' accommodation is subletting rooms or studios within private homes. This is common practice in some of the case-study regions. Two interviewees had different perspectives on this opportunity. A WHMS worker in the Margaret River Region had tried renting a room but found the restrictions on having friends over and her lifestyle too restrictive, and moved into a hostel (WMR3). In contrast to this, a PALM worker lived with a single-parent family in V2 and established strong, enduring relationships (SV2-7). In some contexts, placing workers in private homes is best done through a process where expectations and learning about rights and obligations are facilitated through a community housing advocate. Such a process ensures that tenants and landlords' expectations are matched, and there are clear understandings and expectations (SV2-1, SV2-7). This is most applicable to PALM workers who are seeking quiet, affordable accommodation and relationships with the host community, but also need to negotiate intercultural differences.

5.5 Pathways to new workers' accommodation

Private provision of worker housing would be a market-based solution to address worker accommodation shortages—for instance, through employer investments. In practice, private development is generally only undertaken by some large companies for their employees. These businesses have the capital to buy and develop land, or to rent large or multiple properties. Initiatives where private developers have delivered accommodation for workers from other companies are rare in Australia. Two recent attempts in Western Australia, in Exmouth and Kalbarri, were delivered by local governments rather than the selected private providers (SCB2). Hence, there is a need for innovative pathways for developing workers' accommodation.

Focus groups in Coral Bay and the Margaret River Region viewed multi-business accommodation as an important option for providing workers' accommodation. 'Multi-business accommodation' is where a number of employers use the same organisation to develop and provide accommodation for workers. Multi-business facilities reduce the costs and risks for employers by increasing the scale of investment and spreading risk across several organisations. Multi-business facilities allow SMEs to secure worker accommodation. They can also be structured in ways that increase their chances of government investment and support.

In addition to multi-business facilities, government support is an important way to reduce the costs of developing accommodation. EU experts interviewed for this study indicated that collaborative approaches at local or regional level have been critical in finding workable, practical solutions for issues around seasonal work, including accommodation (IE1, IE2).

Our research and the focus groups suggest that public-private partnerships can greatly increase viability as a form of government-supported risk reduction. The focus groups explored models inspired by affordable housing. A major concern with public funding is ensuring that worker housing is not repurposed and sold. Land-lease arrangements—where state or privately owned land is leased for the purpose of workers' accommodation—may be an option. Such arrangements reduce costs and ensure that the accommodation remains for workers. However, lease arrangements need to be long enough for private investors to secure loans for the development of the accommodation.

Another way to increase the chance of public investment is to organise private investment and work with either a regional development body or a community housing provider (CHP) on arrangements and applications for state and federal housing programs.

Box 7: A business cooperative in Coral Bay

Coral Bay has land zoned for workers' accommodation and a preference for multi-business workers' accommodation. The Coral Bay Focus Group discussed the model that would be most appropriate for their businesses. Their preferred model is a business cooperative organised through the Coral Bay Progress Association (CBPA) with the purpose of providing multi-business accommodation for permanent workers. (The CBPA is a coalition of business owners and long-term residents.) This would allow businesses to guarantee that they can access accommodation through their membership of the cooperative. Cooperative rules could allocate accommodation based on the number of shares or investment in the cooperative. Membership of the cooperative would only be open to Coral Bay businesses and only workers and business owners would be eligible as tenants. While this was viewed quite favourably by participants from government and larger organisations, Coral Bay residents were concerned about the potential power imbalance between employers and employees.

While the Margaret River Region Focus Group did not see its role as deciding on a model, the Coral Bay Focus Group articulated a clear preference for a business cooperative (see Box 7).

Business cooperatives are where businesses form a jointly owned and democratically controlled corporation for the purpose of providing a service to its members, and they can be for profit or not-for-profit (United States Department of Agriculture [USDA] 2001). The purpose of a business cooperative would be to provide multi-business accommodation for workers, and businesses who join the cooperative would have first access to the accommodation. A business cooperative:

- reduces risk by dividing the investment across the members of the cooperative

- provides an attractive partner for governments by guaranteeing that public investment would be secured for long term provision of workers' accommodation.

A successful cooperative would be able to expand their accommodation offerings over time, and is less concerned with making a profit as the members receive an ongoing benefit from the accommodation services provided.

An alternative arrangement is cooperative rental housing, which is a community-led form of social housing where the housing is run by the people who live in it. Workers would become members of a cooperative that rents the accommodation from a community housing organisation that assists the members to run the cooperative. This would provide longer-staying workers with more secure housing and address the current power imbalance between employers and workers. This would require investment from the state government—although tourism businesses could also make long-term investments to increase worker housing in this model. Cooperative rules can limit access to workers in particular industries. This is a well-known model for affordable housing that could attract state or federal funding, and would generate additional community benefits if there was an active and engaged group of residents running the cooperative (Gurran et al. 2008).

Two other low-cost options were explored.

The first option was modular accommodation on state land that was not being utilised. This was viewed as an option for multi-business accommodation in the Margaret River Region—if appropriate land could be identified. The Victoria Focus Group of PALM workers identified modular accommodation in Western Australia that was suitable, low-cost and supported by the workers who stayed in it (FGVW7).

The second option addressed a particular group of seasonal workers. Both Coral Bay and the Margaret River Region lacked caravan-park style accommodation. Thus a 'workers park' was viewed as a low-cost way of:

- relaxing pressures on accommodation in Coral Bay

- addressing illegal camping and excess demand for hostel accommodation in Margaret River Region.

5.6 Leadership and roles

In places where the market is failing to provide workers' accommodation, there can be a leadership void between agricultural, tourism and hospitality industries and the different levels of government.

While businesses are open to investing in accommodation for their workers, and there is significant appetite to develop secure affordable dwellings to support this workforce, the financial and administrative hurdles to developing worker accommodation are often considered insurmountable.

There was a concern in the Margaret River Region Focus Group that existing government schemes were not directly addressing the issue of worker accommodation—especially as it ranged from housing ongoing and skilled workers to more temporary and unskilled workers. The funding programs directed towards workers in the region were noted, but these were considered to be piecemeal and lacking defined objectives.

The federal government's role is to administer and coordinate for the international workers within the WHMS and PALM schemes. There is a need for monitoring and review of PALMS settings, in particular, due to the large number of PALM workers in Australia. The PALM scheme now numbers over 30,000 workers, and affects labour and housing markets.

Observing other countries indicates how Australia could improve coordination of its regional workforce. For instance, New Zealand has 12 Regional Steering Groups and a National Steering Group that engage with labour supply issues and planning—including infrastructure and information provision. The National Steering Group improved communication and assisted in creating greater awareness around regional seasonal workforce issues; this supported a more consistent labour supply and higher standards (Howe et al. 2019). The regional groups work with Immigration New Zealand and the Ministries of Business Innovation Employment, Foreign Affairs and Trade, and Social Development, and have led to substantial financial commitments to improving accommodation and working conditions.

Stakeholders in the interviews and focus groups expressed a desire for the state government to take greater leadership in addressing regional worker housing. For instance, the Margaret River Region Focus Group participants argued for a scheme that:

- identified quantifiable objectives

- identified suitably located land

- set up an expression of interest (EOI) process for multi-business development of worker accommodation.

The argued that such a scheme would generate momentum and avenues for businesses to develop a coordinated initiative. This is likely to require coordination between planning and economic development areas to overcome the barriers to new workers' accommodation.

Regional bodies could either:

1. Be based out of the state governments—like the Regional Development Commissions in Western Australia

2. Have representatives from federal, state and local governments—like the Joint Organisations in New South Wales.

Joint Organisations have the functions of establishing strategic regional priorities, providing leadership and taking up opportunities. These bodies can play important coordination roles between local governments and organisations and state-government programs when planning and executing initiatives.

Local government is playing a growing role in facilitating and managing worker housing, as it can:

- identify land
- apply for state government programs
- advise on planning processes and requirements.

Local governments are a key partner in ensuring that worker housing is developed and sustained in their communities. They are increasingly becoming engaged in these initiatives due to housing shortages that cannot be addressed through the private housing market alone.

Businesses, facilitated by business groups, are incentivised to address workers' accommodation as it is a major impediment to their operations and growth. The value they derive from securing adequate housing offsets the longer time required for investments to be realised. If a multi-business model is successful, it can serve as a driver for further investment, diversification and growth in provision of workers' accommodation.

One group that could play a greater role in providing workers' accommodation is community housing providers (CHPs). CHPs are not-for-profit organisations whose role it is to develop and manage community housing—including providing support for tenants to advocate for themselves and access services. Surplus revenues are invested back into new housing, property improvements or services for tenants. CHPs are well placed to address advocacy issues and the needs of tenants, and could take the burden from employers to develop and manage worker housing. They are also a familiar entity for state governments and are regulated in most states.

Developing worker accommodation would require a learning process for many of the organisations involved—particularly at the local level. This became apparent to us in the Coral Bay Focus Group, when some participants were advocating for outcomes that contradicted the local planning settings.

Plans for workers' accommodation may be best advised to follow a similar model to affordable housing: functional, low-cost accommodation on small blocks with land lease agreements and potentially engaging a CHP. Land is scarce and expensive in our case-study locations, and will need to be maximised. Coming to terms with these settings and outcomes will require a process of education and information-sharing. There will be aspects of the accommodation that will require some of the stakeholders involved to adjust their expectations—for instance, preventing changes in building use or sales, or the kinds of accommodation it produces. This adjustment will be an important part of the process.

5.7 Policy development to stimulate availability and supply of workers' accommodation

There are several policy levers that can be used to increase the availability and supply of workers' accommodation in regional areas.

In land planning and regulation, we recommend the following:

- Zoning land as workers' accommodation through special control areas to ensure public investment in workers' accommodation leads to long-term solutions.
- Considering planning requirements for larger-scale new developments—such as tourist resorts—to include provision of workers' accommodation.
- A vacant residential land tax—modelled on Victoria's vacant residential land tax.

- Requiring registration of all short-term rentals in regions with high demand for rental accommodation, and require time-limited development approvals for short-term rentals that exceed 90 nights in a calendar year—modelled on Western Australia's Planning for Tourism and Short-Term Rental Accommodation Guidelines.

While housing-market dynamics differ considerably between locations, government support is highly likely to be required to ensure affordable housing can be viably provided:

- Government support should encourage multi-business accommodation facilities because they:
    - reduce costs and risks
    - are more accessible for SMEs
    - fit well with the priorities of government programs for public support to develop workers' accommodation.

- Leveraging government support to form collaborative partnerships may be required to achieve the scale to make purpose-built worker accommodation viable.

- There is a need to analyse and provide information on a range of special purpose vehicles for providing multi-business facilities. Based on our focus groups, we recommend exploring business cooperatives as one of these vehicles. Models must:
    - bring private investment
    - be appropriate for government support
    - provide pathways for SMEs to secure workers' accommodation.

- Where the private sector is unable to deliver workers' accommodation, state governments should consider cooperative rental housing for long-term workers who are unable to secure affordable accommodation.

- Models for delivering workers' accommodation should also consider the safety and security of workers, and address the security of accommodation in their rules and regulations.

- Developing models for workers' accommodation is likely to be a process of education and information-sharing that resets expectations for what is possible and desirable in the current market.

Government support can increase the viability of investment in workers' accommodation through the following:

- Programs that prepare land to come to market and grant schemes that focus on securing co-investment.

- Land-lease arrangements that reduce costs and ensure that the land use remains workers' accommodation. Leases need to be long enough for private investors to secure finance.

- Providing land in the medium-to-long-term for modular accommodation, which is another low-cost model for delivering worker accommodation.

- Providing a clearer pathway for private businesses to deliver workers' accommodation, either as a collective or individually, through specifying land and identifying objectives.

- Incentivising the refurbishment and repurposing of ageing building stock into worker accommodation—such as residence halls—by providing tax incentives or dedicated grant schemes that could help to turn the challenge of ageing building stock into an opportunity.

We also recommend:

- Investigating programs at the municipal level where housing advocates facilitate PALM workers to sublet rooms or studios from private homeowners.

- Regions with accommodation shortages investigate establishing 'workers parks' where seasonal workers with their own accommodation can stay at reasonable rates and close to amenities. This would reduce the demand on hostels in peak season and address illegal camping.

6. Lessons for working with Aboriginal corporations to provide regional worker accommodation

- **Engaging Prescribed Body Corporates (PBCs) or other Aboriginal corporations in developing workers' accommodation can add complexity, but is an opportunity for long-term solutions and Indigenous economic development if there is sufficient public investment and a clear approach to risk mitigation.**

- **Traditional Owners' responsibilities and relationships need to be taken into account in discussions, planning and negotiations.**

- **There needs to be provision of independent legal and financial advice and human-resource capacity building for Aboriginal organisations to reduce the risks associated with making commercial decisions.**

- **A strong relationship between Aboriginal corporations and government is crucial to realising a pathway to workers' accommodation.**

- **The costs of holding freehold land are substantial. Aboriginal organisations should be advised of the ongoing costs of holding land and for any land offered to be held in trust until there is a clear and certain pathway to development.**

- **Capital-raising, including through land sales, is important for Aboriginal organisations to generate the capacity needed for outcomes on the ground to eventuate.**

Aboriginal organisations who hold native title for their members are often engaged in regional land-use planning and development—particularly where their native title rights apply to land availability and use. This can either be seen as:

- a positive engagement for constructive outcomes, or

- a limiting engagement that sees native title as a constraint and barrier to be overcome or negotiated around.

Aboriginal organisations are generally seeking to achieve a range of outcomes for their members, including community development, natural resource management and financial returns. This chapter:

1. Documents the experiences of the Baiyungu Aboriginal Corporation (BAC)[9] in its negotiations and initiatives in Coral Bay.

2. Draws lessons for Aboriginal corporations and government partners when seeking to develop workers' accommodation through native title agreements.

As outlined in Chapter 1, this chapter documents one of the few cases in Australia of an Aboriginal organisation engaging in a public-private arrangement to deliver workers' accommodation that has broader relevance across Australia. The Coral Bay case-study provided an opening to document the BAC's journey and share learnings for locations where Aboriginal organisations have similar opportunities.

Aboriginal organisations that hold native title require registration by the Native Title Tribunal and are referred to as Registered Native Title Bodies Corporate (RNTBCs) or as Prescribed Body Corporates (PBCs) under the Native Title (Prescribed Body Corporate) Regulations. This is a select group of Aboriginal organisations that are able to enter into agreements that make use of their lands (called Indigenous Land Use Agreements (ILUAs)).

Native title is defined in Australia as rights to and interests in land or waters that existed before, during and after European colonisation due to traditional law and customs and that are recognised by Australian common law.[10]

6.1 Native title and workers' accommodation

To the best of our knowledge, Coral Bay is the only initiative in Australia where an Aboriginal Corporation has been engaged in the delivery of workers' accommodation.

While there are no other studies, other bodies of literature point to likely problems. The primary problem, expressed in Chapter 5, is that the financial case for the private-sector delivery of worker accommodation is not compelling, as it leads to a leadership void where accommodation provision falls between the responsibilities of employers and state agencies. Engaging PBCs or other Aboriginal corporations as a third party to this problem adds complexity—but it is also an opportunity if there is sufficient public investment and a clear understanding of what the risks are for this process and how they can be mitigated.

The context of building partnerships between the state and PBCs is the troubled history of state engagement with Aboriginal people and the ongoing effects of policies. The leaders and members of PBCs and other Aboriginal organisations have all been impacted by the segregation and then assimilation policies of the nineteenth and twentieth centuries that created much pain for their families, including the Stolen Generations (Haebich 2000). The recognition of native title in 1992 began a shift in this relationship, as the extent and effects of native title were clarified through legal proceedings and legislation, and Aboriginal ownership and management of land spread across Australia (Markham et al. 2019).

As of 2024, according to DAFF (2024), 20 per cent of land in Australia was owned by Indigenous communities, 25 per cent was under Indigenous management, and 58 per cent was subject in some way to special rights for Indigenous people. Together, these overlapping categories comprise an *'Indigenous estate'* covering approximately 70 per cent of Australia's total land area. Aboriginal leaders whose lives were severely impacted by state policies are often asked to become partners in support of state projects, not just for their benefit but to also 'free up' the pathways for development.

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9 The BAC is not a native title–holding organisation. Its formation preceded native title determination and it works cooperatively with the PBC Nganhurra Thanardi Garrbu Aboriginal Corporation.
10 This definition is based the *Native Title Act 1993* (section 223, accessed 22/09/2023).

The trust issues are compounded by the capacity of state managers to engage with Aboriginal perspectives and priorities (Howitt et al. 2013). This led Hibbard and Lane (2008) to identify the *'inability of state planning processes to understand, respect and give expression to distinct indigenous needs in the use and management of land'*. A key principle is that land is Country—a philosophy of an interconnected, sustaining life force (Graham 2013) that embeds custodians in a web of relationships and responsibilities. Making decisions about land is complex for Aboriginal and Torres Strait Islander people, and can have social, spiritual and health impacts. Consultations about land use require cultural competencies and assurances that obligations to Country and community will be met (Janke 2021).

6.2 Baiyungu Country and Coral Bay

Baiyungu Yinnigudurra Country extends from Point Quobba north of Carnarvon to Exmouth and Exmouth Gulf along the coast, then stretches east almost to the Kennedy Ranges and north to the eastern shores of Exmouth Gulf. The Baiyungu people, through the Baiyungu Aboriginal Corporation (BAC) and native title organisations, have successfully advocated for their Country and their community.

In 1997 Cardabia Station, a short drive north of Coral Bay, was purchased for the Baiyungu people; and in 2019, the native title of the Baiyungu people was recognised as part of the Gnulli Native Title determination after 22 years of perseverance. In 2020, the Baiyungu people, through their PBC, Nganhurra Thanardi Garrbu Aboriginal Corporation, entered into a joint management agreement with the Department of Biodiversity, Conservation and Attractions to jointly manage the Nyinggulara National Park, Nyinggulu Coastal Reserve and the terrestrial portion of the Ningaloo Marine Park. These outcomes have given Baiyungu people a voice in the management of their Country and provided them with opportunities.

The area that includes Coral Bay, right back to Minilya, taking in Maude's Landing, is the core of Baiyungu Country. This area is traditionally for meetings, welcomes, marriages, and as a seasonal gathering place. The Baiyungu people and other Indigenous people from nearby areas have met in Coral Bay for thousands of generations. Paul Baron (BAC General Manager and Baiyungu Elder) calls this area *'the heart and soul of the Baiyungu people, of particular importance'*. Paul Baron has been involved in these developments and this aspect of the research draws from his experience.

Non-Aboriginal occupation of Coral Bay began as a shack settlement for pastoral station families and employees in 1933, which they used as a summer retreat. Coral Bay has a longstanding connection with Cardabia Station. Commercial development began in 1968 when a hotel, caravan park and service station were established. The area expanded in the 1970s with another caravan park, and now consists of two caravan parks, a backpacker hostel, holiday homes, a resort, a shopping centre and a pub. It has high occupancy rates and is a popular tourist destination.

While a townsite was gazetted at Maud's Landing in 1896, three km north of Coral Bay, Coral Bay itself has never been a 'normalised' townsite and is instead designated as a tourism node. No permanent residential development is allowed in Coral Bay. The population is capped at 5,300 people, with limits on the number of tourists and workers who can be accommodated. While effective in limiting the size of the tourist settlement, it has created an ongoing issue for permanent and seasonal workers who have been housed in informal and substandard accommodation for many years.

6.3 Workers' accommodation initiatives in Coral Bay

In 2004, the BAC began discussing an agreement with the Government of Western Australia to surrender a coastal strip and land from Cardabia Station as a future coastal reserve for integration with the Ningaloo Marine Park. This agreement included a native title settlement for Coral Bay and the Ningaloo Coast that involved an exchange for freehold land for tourist development and a lease for the development of worker accommodation (Government of Western Australia 2006). This was the basis for a formal agreement to develop workers' accommodation in 2010 (YMAC 2010). This is a theme unique to Coral Bay—but one that has relevance to the rest of Australia.

Residential development has been opposed in Coral Bay since the 1970s for a number of reasons.

In the 1970s, the Shire of Carnarvon was concerned about the absence of a town water supply, and subsequent planning documents sought to limit the risk of damage to the environment—principally the fringing coral reef in Bill's Bay—by constraining visitor numbers and development.

Following the election of the Gallop Labor government in 2001, the government developed a comprehensive Ningaloo Coast Regional Strategy for the Ningaloo Coast in 2004 that included the Coral Bay Settlement Plan. This Plan limited the expansion of Coral Bay to 3,600 overnight visitors, 400 staff and 500 day visitors, and sought to focus residential growth in the larger regional centres of Exmouth and Carnarvon. It also continued the policy position of no freehold residential development in Coral Bay, which has since been incorporated into a West Australian Planning Commission (WAPC) policy and as a provision in the Carnarvon Shire Local Planning Scheme.

Following negotiations and a framework agreement with the state in 2010, the BAC took freehold possession of 30 hectares of land in Lot 308 at the northern end of Coral Bay. Lot 308 was initially designated as leasehold land in the framework agreement and zoned for workers' accommodation only—and not for tourism development.

The BAC used a project director to seek outcomes with Lot 308 via a subsidiary company with mixed results. The project director applied for a residential subdivision that was refused by the WAPC and the State Administrative Appeals Tribunal. This was a significant decision. It affected the partnership between the BAC and the state as it was a significant diversion from the original intention of the framework agreement. There are other complicated matters relating to the subsidiary structure and management that also impacted on delivering workers' accommodation on this land.

However, there have also been successes. The state government funded the development of 37 units in 2011 through Royalties for Regions. The units were built as seasonal staff accommodation—and are now leased from a BAC subsidiary company (Government of Western Australia 2018). In 2022, RAC purchased a superlot on 308 to build 42 units for its own workforce, which was completed in 2024—again with some state support for services.

In total, 79 units have been built that house up to 130 people on Lot 308. Despite these developments, Lot 308 has not generated the 400 beds for workers' accommodation that has been the long-term planning objective to support workers and employers in Coral Bay, and it remains mostly undeveloped. This is due mostly to the difficulty of developing workers' accommodation caused by issues securing investment and developing effective private-public partnerships (canvassed in the previous chapter) and the shift in direction in project leadership. The project director is no longer employed or involved in the governance of the BAC subsidiary, with the BAC recently taking control with a view to making better progress.

Recent changes in land-use zoning in Coral Bay have increased the complexity and challenges of developing workers' accommodation on Lot 308.

In 2014, a new Coral Bay Settlement Structure Plan proposed expanding Coral Bay to 4,800 overnight visitors and allowing holiday accommodation on Lot 308—the land intended for workers' accommodation. This occurred when the Shire of Carnarvon Local Planning Scheme was changed in 2023. The financial returns on holiday accommodation exceed that for worker accommodation, which complicates the commercial drivers for using some of Lot 308 to accommodate workers.

Additionally, the Shire of Carnarvon also allowed landowners to house their own workers on their own land, reducing the incentive for landowners to invest in new offsite workers' accommodation. In order to preserve some of Lot 308 for workers' accommodation, the WAPC created a special planning control area within Lot 308 that restricts the use in this area to workforce accommodation. This includes the existing workforce accommodation, as well as undeveloped land including the area proposed to be sold to Coral Bay businesses. Much of the balance of Lot 308 is now likely to be developed into holiday homes.

6.4 Policy lessons from Coral Bay

Respecting Country and Custodians are key elements of engagement with Aboriginal organisations and are particularly important where there are changes in land use.

- People and organisations who want to partner with PBCs and related Aboriginal corporations need to respect the connections and rights that Traditional Owners have with their Country when they are seeking to engage in initiatives such as building workers' accommodation.

- Traditional Owners' responsibilities and relationships need to be taken into account in discussions, planning and negotiations.

- There should be respect for senior leaders as knowledge holders and Custodians, and plans should respond to these connections during and after the development of workers' accommodation.

External advice and training for Aboriginal organisations is likely to be required.

- A key finding is that state allocation of Crown land to an Aboriginal Corporation under a native title settlement does not by itself address the range of financial and other capacities needed to get developments off the ground.

- There needs to be provision of independent legal and financial advice and human- resource capacity building for PBCs and related Aboriginal organisations to reduce the risk of making poor deals, acting on bad advice or others exploiting the opportunities intended for Traditional Owners.

Relationships between Aboriginal corporations and government need to be strong and enduring:

- A strong relationship between Aboriginal corporations and government is crucial to realising a pathway to workers' accommodation.

- Government investment will be crucial in Coral Bay due to the absence of residential housing and high building costs, and these investments require strong protections.

- When the relationships between the state government and Aboriginal organisations break down, there needs to be a mechanism to rebuild trust and reopen communications.

The costs of freehold land are a burden to Aboriginal organisations who are often asset-rich and cash poor:

- The costs of holding freehold land are substantial. Custodians should be advised of the ongoing costs of holding land and for any land offered to be held in trust until there is a clear and certain pathway to development.

Raising capital is a barrier for Aboriginal organisations:

- Aboriginal organisations often do not have access to capital for the investments necessary to realise returns on lands. This also creates issues for partner organisations as there is a need to find additional funds before projects can be executed.

- Land sales are important for Aboriginal organisations to generate the capacity needed for outcomes on the ground to eventuate.

7. Policy development options

7.1 Key questions and answers

This research considered the risk of housing precarity for workers in regional Australia. It addresses the overarching question:

- *How can workers in Australia be better accommodated to ensure a healthy, safe and productive workforce in regional areas?*

To answer this question, the project answered four research questions:

1. What are the contemporary practices used to provide accommodation to seasonal and vulnerable workers in regional Australia? What are unintended and unwanted consequences of these practices?

2. What are the accommodation experiences of seasonal and vulnerable workers in regional Australia and how do they shape their labour market choices?

3. What are the barriers to innovative practices to providing healthy and safe accommodation for these workers in regional Australia and comparable international locations?

4. What policy changes are needed to support innovative practice solutions to address seasonal and vulnerable worker accommodation pressures in regional Australia?

Before addressing these questions, it is important to understand how differences between workers and locations affect our findings.

Understanding seasonal and vulnerable workers requires consideration of two axes:

- visas

- length of stay—whether workers are short-term or stay for over 12 months (are semi-permanent).

Visas: workers are identified in our study as PALM, WHMS or AS workers because of the restrictions that visas place on PALM and WHMS workers.

Length of stay: all three types of workers are affected by the length of their stay, as accommodation requirements and expectations change when workers stay for extended periods.

Length of stay primarily affects PALM workers, who are divided between two programs:

- nine months or less

- over 12 months and up to four years.

Australian workers and workers on other visas who stay for over 12 months may also be affected, depending on their location. Semi-permanent workers are a separate category, who only overlap with precarious accommodation when locations experience severe accommodation shortages.

Location: Housing in regional Australia is becoming more expensive and in higher demand in locations where there are services, tourism and outdoor amenities (Gurran et al. 2025). This is primarily in coastal regions, tourism destinations and regional cities.

In locations where housing is in low supply and high demand, workers and employers are more likely to struggle to find workers' accommodation and experience greater levels of housing precarity. Our five case studies were in locations with:

- strong tourism sectors: Margaret River Region, Coral Bay, V1

- strong tourism sectors and/or strong agricultural industries: Margaret River Region, V2, New South Wales.

All case-study areas have tight housing markets characterised by very low vacancy rates and increasing rents. In particular, Coral Bay has many Australian semi-permanent workers staying in precarious accommodation due to a severe worker accommodation shortage.

7.1.1 Contemporary practices for providing accommodation for seasonal and vulnerable workers

The most important division in worker accommodation provision is between employer-provided accommodation and third-party-provided accommodation.

Employer-provided accommodation occurs when there are obligations on employers (such as the PALMS) or where there is no other accommodation available (such as in Coral Bay and in remote agricultural work). These workers are most vulnerable to unaffordable, often inappropriate housing, but are less likely to raise their concerns because of the absence of housing choice, the need for employment, and a lack of knowledge about how to raise a grievance.

Third-party-provided accommodation is generally independently sourced. There may still be links to employers, such as in hostels that require guests to work in the area. Workers in third-party-provided accommodation have less reliance on their employer and are more mobile. These workers tend to be more satisfied with their accommodation and more likely to advocate for themselves when there are maintenance or other issues.

Workers had a strong preference for renting dwellings through the private rental sector. This accommodation provided the highest quality, greatest security and was regularly lower in price. These preferences are most clearly demonstrated by PALM workers who revealed that the private rental sector:

- improved their accommodation outcomes

- was cheaper

- provided more privacy

- gave them more control over their domestic space.

Workers who have and prefer their own mobile accommodation—typically a van, tent or caravan—can choose a third form of provision:

- to camp illegally—known as 'free-camping'

- to stay on private property.

Where it occurs, free-camping frequently leads to tensions with local communities. Only a small proportion of WHMS and AS workers undertake free-camping, with most staying in caravan parks or outside hostels.

Contemporary practices used to provide accommodation for seasonal and vulnerable workers are diverse in accommodation type, cost and quality. There is a notable reliance on temporary and informal housing and—even when staying in formalised accommodation like houses—typically temporary measures like bunkbeds and adults sharing a room are likely. More remote locations and locations with smaller populations are more likely to use informal accommodation.

Workers who are reliant on employers for their accommodation—or reliant on accommodation providers for their employment (Barry 2021)—are more vulnerable to exploitation and precarious housing arrangements. This form of provision requires greater oversight and regulation than third-party-provided accommodation. Stronger agency from workers improves accommodation outcomes.

7.1.2 The accommodation experiences of workers in regional Australia

The main influence on workers' experiences of their accommodation and their labour market choices are visa conditions—which are linked to the requirements of the workers themselves.

There are similarities among workers in regional industries, as they:

- seek affordability and value for money
- want private space and some control over their space
- value sociality
- want good relationships with the local community.

However, their responses within these broad categories demonstrate the differences between the three groups discussed in this report.

PALM workers had a strong focus on saving and remittances, and were seeking to keep costs low in Australia. They wanted private space to communicate with their family and social network in their home country, as well as a group of people who they could coordinate well with in their accommodation.

PALM workers often socialised through their churches and related community organisations.

This can be compared with WHMS and younger AS workers who were:

- seeking to socialise with each other in the evenings and on weekends
- less concerned about private space
- saving money for their travels.

There are also differences within groups, such as the differences within Margaret River Region WHMS workers in price sensitivity between workers with vans, hostel backpackers and affluent backpackers (see Box 2).

PALM workers often had poor housing outcomes and lacked privacy due to their reliance on their employer, as well as language and cultural differences. The guidelines for accommodation result in relative market rates being paid for sharing rooms and sharing bathroom and kitchen facilities with many more people than for WHMS and AS workers. The costs and the way these costs are deducted from their pay was not always well understood.

PALM workers often shared rooms with at least one other unrelated person and, despite living in Australia for over 12 months, were likely to have little storage options for their possessions. They placed great importance on keeping in contact with family members and complained of the isolation of living in Australia.

WHMS workers were more social than PALM workers and were seeking to meet people and see the region where they were travelling. As they were generally in a location up to three months, some tolerated low-quality accommodation as temporary, due to their mobility.

Semi-permanent workers had different accommodation requirements to seasonal workers. These workers are often more senior and, after long days dealing with staff and tourists—in the Western Australian case studies—needed privacy and a chance to switch off. Owing to accommodation shortages, senior staff were often living with junior staff in cramped quarters—for example, in Coral Bay. Semi-permanent workers:

• required more storage

• were less interested in socialising with other staff

• needed private space to recuperate from busy days.

These points also apply to longer-term PALM workers.

There are concerns about discrimination towards migrant workers in our case studies, in particular when applying for private rental properties, but also violence towards WHMS workers' vans parked overnight in public areas. PALM workers experienced discrimination when seeking private rentals, but also often had strong relationships with locals through organisations like churches and sporting clubs.

Precarious housing is more likely where the housing market is unable to deliver appropriate housing for permanent workers. In Coral Bay, both seasonal and permanent workers experienced expensive, informal housing—such as caravans, portable houses, caravans and converted buses. This led to greater concerns with medical, mental health and fire-safety risks from their accommodation relative to other locations. In Margaret River, precarity increases at peak tourism season due to the increased costs and demand for all types of accommodation. There is a stronger case for state intervention in these locations.

Accommodation plays a large role in shaping the labour market choices of WHMS, AS and semi-permanent workers.

WHMS and AS workers will avoid regions or leave quickly if their accommodation is substandard. When workers choose to stay, awkward accommodation arrangements can still cause them to depart. When semi-permanent workers begin to be pushed into precarious housing, they either avoid the region, or require their employers to subsidise their accommodation or pay a premium wage for their level of experience.

PALM workers have less agency to avoid employers or regions, but still share information on employers through their networks and supporting organisations. There is awareness of accommodation standards and employment practices for different employers. Housing availability and accommodation quality are already shaping labour markets.

7.1.3 Barriers to innovative practices

Visa conditions

Visa conditions do not currently encourage quality accommodation outcomes.

In particular, PALM workers' visa rules prevent them from changing employers—which make them particularly vulnerable to precarious accommodation. PALM workers:

• feel unable to raise issues or seek remedies without jeopardising their current and future visas

• may lack English language skills, yet receive their contracts in written English; they can struggle to understand employers and information

- had little knowledge of the formal complaints process

- are likely to require more assistance to address issues, and would benefit from stronger social and support networks.

These issues are also barriers in Europe and the USA.

PALMS accommodation standards

There are three issues with standards for PALM workers' accommodation.

1. Monitoring of accommodation is poor. There is little assistance for PALM workers to advocate for themselves, which they require due to the cultural and language barriers and their reliance on their employer.

2. The standards are not appropriate for semi-permanent workers who spend up to four years in Australia and are likely to return.

3. The standards do not meet the *Approved Employer Guidelines* of being provided *'at cost'* (DEWR 2023b:75) or being *'comparable to local market rates'* (DEWR 2023b:71). There are clearly organisations profiting from the low standards, leading to the overcrowding issues we and other researchers have documented. Ineffective standards create poor outcomes for both the PALM workers and a local housing market. There is also currently little protection for non-PALM workers who live in employer-provided accommodation.

Comprehension of standards

Comprehension of standards is lacking across seasonal and vulnerable workers who are unaware of both their rights and how to advocate for improved housing.

Increasing the local networks of workers would assist with housing literacy and advocacy. This also raises the problem of what happens to workers once they establish strong networks in an Australian community. They cannot build long careers or make longer-term contributions due to their visa conditions if they are:

- prevented from working for one employer longer than 6 months (WHMS)

- forced to return home after their visa finishes (PALMS).

Tight rental markets

All of our case studies had tight rental markets with increasing rents. In two locations, the growth of short-stay holiday rental accommodation had reduced the rental housing stock. There was also ageing building stock—in particular hotels in the Margaret River Region—that had potential for workers' accommodation but was not accessible.

Public investment in worker accommodation, much like social housing, requires that the accommodation retains its function and is affordable. This makes it a less attractive investment if the main goal is a financial return. This could be addressed with the right planning settings.

Cost of land and construction

The main barriers to new workers' accommodation are:

- the availability and cost of land

- construction and investment returns.

Land availability is an issue—particularly in the Margaret River Region and Coral Bay. Cost and returns are a particularly large barrier for SMEs. Larger businesses have the resources to make long-term investments to secure workers' accommodation, but smaller businesses risk overcapitalisation and financial stress. However, there is appetite among some businesses to deliver regional worker accommodation.

Engaging Aboriginal organisations

In circumstances where there is a need for workers' accommodation and land is constrained by factors that include native title, proponents need to engage Aboriginal organisations in regional land-use planning and development. The barrier is if such engagement is based on a perception that native title is a constraint that needs to be overcome or negotiated around.

Other barriers to Aboriginal organisations seeking to engage in developing workers' accommodation are:

- respect for senior Aboriginal people through the negotiation process and their relationships with Country

- capacity building to engage with land developments

- maintaining a strong relationship with government

- costs of holding undeveloped freehold land

- raising capital for land development.

7.1.4 Developing policies for safe and secure regional worker accommodation

There is no magic bullet for improved worker accommodation. It will improve if there is a commitment across different levels of government to address this growing issue in regional Australia, which affects Australian and migrant seasonal and vulnerable workers.

Adjusting visa settings

Starting with adjusting visa settings, simple and efficient processes need to be established so that PALM workers can change employers once initial costs have been paid off. This is in order to reduce the power imbalance between PALM workers and employers.

Given the higher risks for PALM workers of exploitation and precarious accommodation, there should be regular inspections and access to a cultural mediator when required to support advocacy; contact information for supporting organisations should be provided to PALM workers. Workers should be given simple accommodation regulation checklists in their own languages as part of pre-departure processes so they can check if their accommodation is up to standard.

Increasing housing literacy

All workers would benefit from information that increases their housing literacy, such as compulsory provision of information about the standards that apply to their housing, and how to advocate to have issues addressed.

Regional communications hubs could improve matching of supply and demand, provide accurate information on work and accommodation options, and provide contact details, timelines and rules or codes of conduct on camping and behaviour.

There is also no future for PALM and WHMS workers with good employment situations and strong local relationships who want to stay in Australia. There should be a scheme for employers to apply for extensions for excellent staff on PALMS or WHMS visas, which could ultimately provide a pathway to permanent residency.

Two standards for PALM workers' accommodation

The PALMS accommodation provisions should have two standards:

- a standard for seasonal workers

- a standard for workers who stay over 12 months (and up to four years).

PALM workers who are staying for over 12 months should be provided with:

- their own room

- adequate storage

- the privacy and means to maintain contact with their families and social network.

The current standard should only apply to shorter-term seasonal PALM workers. Even then, it should be revised to also include:

- space provisions—6.5 square metres per person

- maximum four people per room

- private space for talking with family members.

An improved standard for employer-provided accommodation could be extended to other workers to address the power imbalance that underlies the greater precarity in employer-provided accommodation. Safe Work Australia could develop a model code for employer-provided accommodation with a more appropriate level of detail. This would set a legislated minimum standard for all employer-provided accommodation.

Applying existing legislation can also improve standards for workers' accommodation. Employer-provided accommodation is likely to fall under the lodging house (WA), rooming house (Victoria) or boarding house (NSW) regulations—but these standards are rarely complied with or applied. Applying these regulations would improve the oversight and standards of a great deal of workers' accommodation.

State governments should direct local councils to require employers to apply 'lodging house' regulations, and comply with local and state laws for the management and standards of their premises—including information provision. Similarly, the federal government should explicitly require registered PALMS employers to comply with these state regulations.

Increasing the availability of existing accommodation

There are ways for state governments to increase the availability of existing accommodation. In regions with high demand for rental accommodation, requiring registration of all short-term rentals and development approvals for short-term rentals that exceed 90 nights in a calendar year:

- provides a dataset on short-term rentals

- addresses issues for neighbours

- encourages owners to return accommodation to the rental market.

A vacant residential land tax (modelled on that in Victoria) would similarly encourage existing residential accommodation to be used. A third program could be at the municipal level, for housing advocates to facilitate PALM workers to sublet rooms or studios from private homeowners.

Developing a supply of new regional worker accommodation

Developing a supply of new regional worker accommodation is likely to require public-private partnerships to address the cost, and to encourage collaboration between businesses for the best possible outcomes.

Public programs should encourage multi-business accommodation facilities, as they reduce costs and risks, are more accessible for SMEs, and fit well with the priorities of government housing programs.

There is a need to analyse and provide information on a range of special purpose vehicles for providing multi-business facilities. Models must bring private investment, be appropriate for government support, and provide pathways for SMEs to secure workers' accommodation.

Based on our focus groups, we recommend exploring business cooperatives as one of these vehicles. Where the private sector is unable to deliver workers' accommodation, state governments should consider cooperative rental housing for long-term workers who are unable to secure affordable accommodation.

There are a number of ways to increase the viability of private investment to provide worker accommodation through leveraging public investment. These include:

* programs that prepare land for market and grant schemes that focus on co-investment
* land-lease arrangements that reduce costs and ensure the land use remains for worker accommodation
* providing clear pathways for private businesses to deliver workers' accommodation through specifying land and identifying objectives
* incentivising the refurbishment and repurposing of ageing building stock into worker accommodation—such as residence halls—by providing tax incentives or dedicated grant schemes.

Planning

State and local planning could also encourage investment through planning schemes and special control areas to ensure that public investment in workers' accommodation provides long term solutions. This could be by preventing workers' accommodation being repurposed for tourists or other groups, or by requiring larger-scale new developments (such as tourist resorts) to include provision for workers' accommodation.

A less expensive and short- to medium-term solution would be to establish 'workers' parks', where seasonal workers with their own accommodation can stay at reasonable rates and close to amenities. This would address illegal camping and reduce the demand on hostels in peak season.

Collaborations with Aboriginal organisations

Collaborations with Aboriginal organisations to develop worker accommodation present opportunities for achieving mutual goals, provided there is sufficient public investment and a clear approach to risk mitigation. Traditional Owners take a longer-term approach to investment and want a continuing say in the management of their Country.

To be engaged well, the responsibilities and relationships of Traditional Owners need to be taken into account in all discussions, planning and negotiations with Aboriginal organisations. Aboriginal organisations require independent legal and financial advice and human-resource capacity building to mitigate the risks of uninformed decision-making.

The relationship between the Traditional Owners, Aboriginal organisations and state agencies is crucial, and needs to be managed well. Aboriginal organisations need to be aware of and manage the cost of holding undeveloped freehold land, and be provided with opportunities to raise capital to generate the capacity for the planned outcomes.

7.2 A policy framework for addressing precarity in workers' accommodation in regional Australia

Large gains are possible if there is:

- a commitment to a shared set of values and standards for housing workers in regional Australia across levels of government and industries

- a willingness to make changes and invest in accommodation

- coordinated decision-making to focus on opportunities and issues when they arise.

Table 10 synthesises the policy recommendations into a framework for different public and private stakeholders to engage with workers' accommodation, identifying who should take passage and the roles of different organisations. This framework identifies the policies through which different levels of government and stakeholders can contribute to achieving safe and secure accommodation for workers in regional industries.

Table 10: A policy framework for achieving safe and secure accommodation for workers in regional industries

Policy recommendations	Federal	State	Regional bodies	Local government	Industry groups	NGOs / unions	Aboriginal organisations
Adjust visa settings	A process for PALM workers to change employer Improved monitoring and inspections Access to a cultural mediator Pathway to extending visas that can lead to permanent residency.						
Improve coordination	Coordination between state and industry bodies Request model legislation for employer-provided accommodation from Safe Work Australia.	Coordination between state and industry bodies Review and implement employer-provided accommodation requirements	Coordination between state and industry bodies	Coordination between state and industry bodies	Coordination between state and industry bodies		
Increase housing literacy and worker support	Provide simple accommodation checklists in language in briefings and in accommodation for PALM workers.	Legislate provision of accommodation standards in employer-provided accommodation					
	Regional information hubs	Regional information hubs	Regional information hubs	Regional information hubs	Regional information hubs		

Policy recommendations	Federal	State	Regional bodies	Local government	Industry groups	NGOs / unions	Aboriginal organisations
Improve standards and monitoring	Require registered PALMS employers to comply with state regulations for lodging (WA), rooming (Vic) or boarding (NSW) houses	Direct local governments to apply lodging (WA), rooming (Vic) or boarding (NSW) house regulations		Apply lodging (WA), rooming (Vic) or boarding (NSW) house regulations to worker accommodation			
	Two standards for PALMS accommodation for seasonal and longer-term workers in employer regulations						
Increase the availability of existing accommodation		Regulate short-term rental accommodation		Monitor and enforce short-term rental accommodation regulations			
		Vacant residential land tax					
	Fund NGOs to facilitate PALM workers to sublet rooms					Facilitate PALM workers to sublet rooms	

Policy recommendations	Federal	State	Regional bodies	Local government	Industry groups	NGOs / unions	Aboriginal organisations
Develop new workers' accommodation	Programs that encourage industry investment in multi-business accommodation facilities	Programs that encourage industry investment in multi-business accommodation facilities	Lead development of models for multi-business accommodation facilities	Review and advise on planning settings to ensure best outcomes for applications and accommodation	Engage and advise on models and proposals	Community housing providers could engage to deliver and manage accommodation	Engage with state and local governments and regional bodies on worker accommodation projects
	Publish information on national best-case models and outcomes for workers' accommodation	Develop clear outcomes for programs and work with local governments to identify land	Coordinate local engagement with state and federal programs	Identify land for worker accommodation	Educate members and encourage investment where needed		Consider land-lease arrangements that provide long-term returns on land without keeping ownership
				Identify land for workers' parks if needed	Engage with local government to establish workers' parks if needed		
Engage with Aboriginal organisations to deliver new worker accommodation		Engage with Aboriginal organisations on worker accommodation opportunities	Assist Aboriginal organisations with worker accommodation opportunities	Review and advise on planning settings to ensure best outcomes for applications and accommodation			Seek to work with state government to mitigate risks, and with local government to bring about best outcomes

Note: The shading on this table indicates policies that require or would benefit from coordination between stakeholders. This runs horizontally in the table.

Source: Authors

7.3 Further considerations

The accommodation of seasonal and vulnerable workers is important to:

- Australian and migrant workers

- regional businesses and communities

- state governments—which are increasingly seeking to address housing issues in their regions

- the federal government—which addresses housing and regional industries in its *Migration Strategy* (DHA 2023) and its review of regional migration settings (DHA 2024b).

However, despite this importance, there is currently little coordination between key organisations and institutions.

It is noteworthy that Australia, despite competing with New Zealand for the same Pacific workforce, is behind the other country in its coordination of migrant and seasonal workers, and in its capacity to work with industries to generate investment in worker accommodation.

While the recommendations posed by this report should be immediately acted on, another step towards coordination is an investigation that defines a shared set of values and standards for workers' accommodation in regional industries. Such standards could set a framework and establish roles for stakeholders and different levels of government. This important piece of collaborative work could provide guidance for a range of stakeholders as they seek to:

- influence worker accommodation investment and outcomes

- avoid problems with overreach

- support a stronger, healthier and safer regional workforce.

Our study has brought approaches from community housing to address barriers to workers' accommodation. There are opportunities for further exploration of community housing innovations—in particular, modular housing and the use of community housing providers (CHPs) to develop and manage accommodation for seasonal and vulnerable workers, and especially for PALM workers. These research directions are worth exploring further.

Glossary

A list of definitions for terms commonly used by AHURI is available on the AHURI website <u>ahuri.edu.au/glossary</u>.

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Appendix 1: Margaret River case study

The Margaret River Region case study is located in the south-west corner of Western Australia, around 250 km south of the state capital, Perth.

This case-study region encompasses seven towns within two local government areas:

- the Shire of Augusta-Margaret River
- the City of Busselton.

This region is described by the ABS as an SAL3 region: Augusta-Margaret River-Busselton (Figure A6). The region spans an area of 3,664 km², and includes the coastal Leeuwin-Naturaliste National Park, which extends across both jurisdictions and is well known for its pristine coastline and jarrah and marri old-growth forests.

While the City of Busselton is a fast growing, predominantly urban region (City of Busselton 2019), Margaret River and Augusta are characterised more by a history of agriculture, including viticulture (Shire of Augusta-Margaret River [AMRS] 2022). However, both areas share strong tourism industries, with tourists drawn to the region by the natural environment, wineries and a range of outdoor and nature-based activities.

Figure A6: Augusta-Margaret River-Busselton Statistical Area Level 3

Source: ABS (2021c).

With a permanent population of 57,332 people, the median age of 44 years is significantly older than the remainder of the state, which is 38 years. Approximately two-thirds (67%) of this population reside within the City of Busselton (40,640 people) (ABS 2021b). Similar to the state of Western Australia overall, a majority live in family households (72%). However, the proportion of couples without children (45.7%) is higher than the West Australian average (38.8%) (ABS 2021a).

The residential mobility of the population is similar to Western Australia more generally, with 16 per cent of the population moving in the year before the ABS Census, and 39 per cent moving in the previous five years (ABS 2021a). Unemployment in the region is low at 3 per cent, and half the working-age population is employed full-time, with 3.9 per cent working in a part-time capacity. The majority of the labour force in the region is employed in these industries:

- accommodation and food services: 12%

- construction industry: 11%

- healthcare and social assistance: 11%

- retail trade: 10% (ABS 2021a).

Accommodation

The housing profile in the Margaret River Region is dominated by separate houses (89%), which is higher than Western Australia more generally (79.7%). This highlights the relative lack of diversity in the housing stock, with only a small proportion of alternative housing options such as townhouses or semi-detached homes (7.9%) or other dwellings (1.7%) (ABS 2021a).

Notably, only 74 per cent of private dwellings are occupied—compared to 89 per cent in Western Australia overall (ABS 2021a). The AMRS (2022: 19) estimates that '*30 per cent of the Shire's housing stock comprises second homes, some of which are used for short term accommodation*'. The short-term accommodation options in the case-study region include:

- about 30 caravan, camping or holiday parks

- around 34 hotels or motels

- five guest lodges and backpacker options (Margaret River-Busselton Tourism Association 2025).

The profile of tourist accommodation options is important in this region, as it has an impact on workers' ability to access secure, affordable rentals.

According to the ABS Census data, the region's median weekly rent of $350 was higher than that for Western Australia, which was $340 (ABS 2021a). Rental housing in 2021 was slightly less affordable for those who lived permanently in the region: 33 per cent of tenants were paying 30 per cent or more of their household income in rent, compared to 28.3 per cent for the Western Australian populace (ABS 2021a).

Mortgage repayments in the region at the time of the 2021 Census were similar to the remainder of Western Australia, with a median of $1733 per month, compared to a statewide figure of $1842 (ABS 2021a). In both cases, repayments were equally affordable, with a majority of households paying less than 30 per cent of their income towards their housing costs (ABS 2021a).

However, the dynamics linked to the COVID-19 pandemic altered this situation fundamentally. By February 2025, weekly rents in the region had jumped substantially from the 2021 median rent of $350 to an average of $813 for a house and $530 for a unit or apartment. There was some variation in these rents—for example, Yallingup at $1098/week was higher than Margaret River or Augusta, where the average weekly rent was around $750/week in February 2025 (SQM Research 2025c).

Rental accommodation is hard to find, with an average vacancy rate of 0.6 per cent across the region (SQM Research 2025c). Again, there is some variation, with Dunsborough and Yallingup having slightly more availability (1.2%) compared to Margaret River (0.9%) and Augusta (0.7%) (SQM Research 2025c). The number of building approvals has fallen slightly from a five-year average of 722 approved total dwellings to 685 (ABS 2024)—a factor that may place further pressure on the price and availability of existing housing stock.

Workers' accommodation situation

In the Margaret River Region, hostels, private rentals and caravan parks are the predominant housing options for seasonal workers. Informal options like camping, 'van-living' and 'free-camping' are also present.

During the high season, WHMS and AS workers pursue informal accommodation arrangements such as staying in a van or a tent on private property and paying for the use of amenities. Whether workers have access to private transport also affects their accommodation options in this region, due to limited public transport. Some WHMS and AS workers have vans, and higher degrees of flexibility: they often preferred to live in their vans (on campsites etc.), while those without vans relied more on hostels and rentals.

According to the interviewees, WHMS and AS workers in the Margaret River Region usually arrange their own accommodation, while there are often employer-provided arrangements for PALM workers. Some employers help WHMS and AS workers find accommodation, while others rent accommodation that they sublet to workers.

All interviewees agreed that Margaret River Region experiences severe accommodation shortages for seasonal workers, particularly during November–late April, which is the peak season for agriculture and tourism.

Attempts have been made to improve the situation of seasonal workers' accommodation with varying degrees of success. There were some private business initiatives. Interviewees mentioned employers:

- giving accommodation allowances to workers

- purchasing private apartments and renting them out to employees.

However, the majority of businesses are small and unable to implement such initiatives. There have been attempts to house temporary workers in chalets on agricultural land—which has been mainly in the wineries—and local councils allowing more lenience in terms of parking caravans on private land.

Moreover, greater flexibility was granted to caravan parks to waive maximum-time restrictions so they could accommodate temporary workers for longer periods. The state and local governments also implemented regulations and initiatives in the short-term accommodation space. Nevertheless, when discussing current regulations and past approaches, the interviewees agreed that, as yet, no appropriate solution has been found for housing seasonal workers specifically, or for affordable housing in the region more broadly.

Interviewees noted that the availability and cost of accommodation greatly affected their motivation to stay in the region. Some workers also reported mental health impacts from having limited access to private space. The lack of affordable accommodation for seasonal workers also negatively affects business capacity in production and service delivery. Several interviewees reported on examples where the region had missed out on talent and business opportunities because of the accommodation shortage. Business owners also mentioned the cost pressures of having to lift wages to help cover workers' accommodation costs (see 'Barriers' below).

Some WHMS workers in Margaret River Region were concerned with growing hostilities with longer-term residents due to issues around:

- 'free-camping'

- being pitched against each other in the debates around housing.

The WHMS workers lamented the local perception that the temporary workers were taking housing from longer-term residents. Some WHMS workers reported feeling 'second' to Australians and holidaying tourists in caravan parks—for instance, WHMS workers who were longer-term caravan-park residents experienced temporary eviction with little notice during busy periods.

Tourism and hospitality are key sectors for the Margaret River Region, with the hospitableness of residents being an important success factor for the region. Several interviewees pointed to the risk that these assets are being undermined due to the conflicts around housing.

Barriers

Interviewees in the Margaret River Region mentioned several factors that negatively influence the housing situation for temporary workers.

First, the accommodation shortage for temporary workers has a long history in the Margaret River Region and can be described as 'chronic'. However, the shortage in private rentals has been exacerbated since the COVID-19 pandemic due to strong tourism demand and a consistent flow of migration from eastern states. Upward pressure on rental costs has also resulted from the increased costs of building materials, higher interest rates, and enhanced connectivity at the Busselton airport.

Seasonal work has typically been low paid. However, unaffordable accommodation has made the ratio between wages and rental costs increasingly unattractive for seasonal workers in the region. Recently, more employers of seasonal workers in the Margaret River Region have started paying above-award wages in a bid to close this rental-wages gap.

Second, the interviewees decreased bed capacity in hostels, possibly due to the challenges with the business model, the COVID-19 disruptions and complaints from neighbours in built-up areas.

Third, there is competition for accommodation between tourists, WHMS workers and AS workers. This is a complex relationship—many jobs for seasonal workers depend on tourism, but a lack of accommodation for seasonal workers limits the capacity and quality of the tourism offering in the region.

Table A11 gives an overview on the accommodation used by tourists in 2023. It highlights the importance of houses and apartments in accommodating tourists in the region, as well as the relevance of booking platforms such as Airbnb in getting access to these dwellings. The interviewees mentioned that the growth in short-term holiday rentals has played a role in restricting access to rentals for seasonal workers in the region. But according to several interviewees, it is unlikely to be the most influential driver. They pointed out the high share of holiday homes in the region that are often empty and thus constitute unused accommodation capacity. (See the share of unoccupied dwellings in 'Accommodation', above.)

Finally, some interviewees pointed to the real-estate speculation that is fuelling the land shortage in the region.

Table A11: Distribution of domestic visitor nights per type of accommodation in 2023 (calendar year, quarterly data) in the Margaret River Region (column percentages)

	Mar Quarter	Jun Quarter	Sep Quarter	Dec Quarter	Total Year
1 Hotels, guest houses, backpackers	23%	16%	33%	9%	20%
2 Houses, apartments	46%	60%	53%	75%	58%
2.1 Share of these houses/apartments booked via Airbnb or similar websites	*24%*	*28%*	*39%*	*38%*	*32%*
3 Caravan parks	28%	22%	12%	11%	19%
4 Other	3%	1%	2%	5%	3%
Total	100%	100%	100%	100%	100%

Source: NVS and IVS, Tourism Research Australia.

Proposed pathways

Focus group participants were asked to prioritise possible initiatives for improving the accommodation situation for seasonal workers in the Margaret River Region. The original list was developed based on the interviews. Table A12 below lists the most highly ranked initiatives.

Table A12: Top seven prioritised initiatives

Initiative	Overall score (budgeting exercise)	Rank
Formation of collaborative partnerships between local businesses—cooperative housing models	140	=1
Government-supported risk reduction (land, incentives, grants etc.)	140	=1
Attracting local/national/international worker housing providers/investors	75	=3
Temporary, moveable accommodation on state land	75	=3
Addressing holiday homes: vacant residential land tax	70	=5
Refurbishment/repurposing of ageing building stock	70	=5
Regional coordination boards for seasonal work	52	7

Source: Authors

The discussion in the focus group was heavily oriented towards increasing the supply of housing for seasonal and vulnerable workers in the Margaret River Region (six out of the seven items in Table A12). Other issues mentioned in the discussion included:

- introducing a visa mechanism to extend the time a WHMS worker could work in a business in cases of strong performance
- providing a platform for seasonal workers to access information about work, accommodation and local rules.

Land supply

Land availability and land cost were viewed as the main impediments to realising worker accommodation in the Margaret River Region.

Commercial viability is a challenge for the development of affordable worker accommodation in a region with high land values and the often low incomes that some of these workers receive. This is why some form of public support with land (and infrastructure) may be necessary to ensure affordable housing can be provided. Affordable and appropriate land for development is scarce.

During the discussion, it emerged that there may be underexplored options to identify suitable land. However, more creativity and openness to alternative approaches are required, according to the focus group attendees. Participants identified three potential sites:

- Water Corporation site

- Department of Communities landholding

- Western Power site in the Augusta-Margaret River Shire.

Attendees noted some constraints, largely around incompatibilities that the potential sites could have with existing populations, and the practicalities of securing the land. Promisingly, it was clear that if the government was to provide an appropriate site, there would be a strong appetite among businesses to invest in dedicated workers' accommodation. The participants expressed in-principle openness to a range of funding models, and considered individually driven investments as well as collaborative investment arrangements.

Participants agreed upon or supported the following:

- *A range of worker accommodation:* The need for a range of worker accommodation for different categories of workers, including more worker campsites for workers with vans, plus more hostel accommodation and built accommodation appropriate for skilled and long-term workers.

- *Recognising worker preferences:* The need to expand hostel accommodation and recognise that some WHMS and AS workers prefer to stay in their vans. Thus a 'Workers Park'—a designated and managed area for workers to park their vans and have access to amenities—should be investigated as one option to increase worker accommodation and curb illegal camping.

- *Information hub:* The establishment of a website that provides information on regional employment opportunities and avenues, accommodation availabilities and codes of conduct for the region.

- *Government leadership:* There is significant appetite to develop secure affordable dwellings to support the transient workforce. However, there is a lack of leadership to navigate and overcome persistent hurdles to solve an issue that all participants see as a key priority.

Recommendations

Table A13 summarises key recommendations from the focus group in the Margaret River Region.

Table A13: Summary of recommendations for the Margaret River Region

Recommendation	Recommended lead	Details
1. Identify and release land for creating new, purpose-built worker accommodation for critical workers, including for workers in the hospitality and viticulture industries	State government (supported by local governments)	1.1 Identify suitable land (considering all potential avenues); 1.2 Release land in an EOI process; 1.3 Ensure land is dedicated for worker accommodation in the medium-to-long-term. Note: Given the variety of accommodation that is needed, multiple sites and initiatives are likely to be required.
2. Creation of a regional online information hub for regional work and accommodation	Partnership of Development Commission, industry peak bodies and local government	2.1 Building on previous experiences of similar platforms set up by the South West Development Commission; 2.2 Include codes of conduct with the platform.
3. Creation of a 'Workers Park' (i.e. dedicated van campsites)	Developers together with local government	3.1 Dedicate a suitable site identified in Point 1 for the creation of a 'Workers Park', where WHMS and AS workers with vans can camp; 3.2 Define management criteria and facility requirements; 3.3 EOI process to identify an operator and/or investor.
4. Encourage investment into worker accommodation	Industry, industry peak bodies	4.1 Illustrate the business case for investment; 4.2 In case no individual business is willing or able to invest, consider cooperative investment and organisation models (including partnering with CHPs for development and management).

Source: Authors

Appendix 2: Coral Bay case study

Coral Bay is situated on the coast of Western Australia, 1,200 km north of the state capital, Perth, on the lands of the Baiyungu people—who play a prominent role in Coral Bay today (see Chapter 6 for an account of Baiyungu engagement in Coral Bay).

The proximity of Coral Bay to the Ningaloo Reef and its moderate climate make it a popular holiday destination. Located within the Shire of Carnarvon, the small settlement is shaped by the tourism industry. Beginning with a shack settlement in 1933 and a hotel, caravan park and service station in 1968, Coral Bay is experiencing a slow process of formalisation. Its demographics and dynamics are shaped by the 2001 election of the Gallop Labor government, where a proposed townsite at Maud's Bay just north of Coral Bay became an election issue. The Gallop government rejected the proposal and instead began a planning process that designated Coral Bay as a tourism node and prohibited residential subdivision. The townsite is restricted by the conservation estate, and the planning framework is established through State Planning Policy 6.3 and the Carnarvon Shire Local Planning Scheme.

With a permanent population of only 245 people, the median age of 33 years is significantly younger than the median ages for the state of Western Australia (38 years) and the shire (40 years). A majority live in one-person (50%) or two-person (28%) non-family households (56%). Unemployment in Coral Bay is negligible (ABS 2021f) and almost half (48%) the permanent population work full-time.

The population is employed in these industries:

* accommodation and food services: 33%

* transport and warehousing: 16%

* administrative and support services: 10%. (ABS 2021f)

The population is quite mobile, with 62 per cent of permanent residents reporting that they have moved in the last five years, compared to only 40 per cent in the Shire of Carnarvon; a third (33%) had moved in the 12 months before the 2021 Census (ABS 2021f). These characteristics are consistent with a tourism centre with limited additional services (Department of Planning Lands and Heritage (WA) 2018).

The workforce in Coral Bay is of mixed demographic, with both short-term and 'longer-term' workers.

Short-term workers are primarily younger individuals, living semi-transient lifestyles, with a significant portion being international backpackers. Backpackers are both AS and WHMS workers. Alongside them are semi-permanent staff who have remained in the area for several years and are both Australian and international permanent residents. Finally, a smaller, older contingent of 'legacy' staff have been established in the area for longer extended periods. As the closest school is in Exmouth 150 km north, there are few families and, as residents need to work to access accommodation, there are no retirees.

Figure A7: Coral Bay urban centre and locality

Source: ABS (2021a).

Accommodation

The accommodation in Coral Bay is dominated by tourism facilities for visitors to the region (Shire of Carnarvon 2014). There have been no freehold land sales since the early 1970s (Gascoyne Development Commission [GDC] 2025).

Reflecting this scenario, Coral Bay has a unique housing tenure profile dominated by rental accommodation (50%) (ABS 2021f), with 26 per cent of private dwellings being owned outright and only 7 per cent of housing stock owned with a mortgage—a proportion that is significantly lower than for the Shire of Carnarvon (21%). Unsurprisingly, two-thirds of the dwellings in Coral Bay were in an 'other' category (ABS 2021).

The majority of freehold land in the townsite is being used as tourist accommodation by Bayview Coral Bay Caravan Park, People Park Caravan Village, and the RAC Resort (previously the Ningaloo Reef Resort). Separate homes, which are usually dominant in Australian settlements, accounted for only 13 per cent of the housing stock, with the remainder being described as semi-detached dwellings or flats/apartments (ABS 2021f). From a strategic planning perspective, Coral Bay is to *'remain a tourism settlement, with no permanent residential development allowed'* (Department of Planning Lands and Heritage WA 2018).

According to the 2021 Census data, rental housing can be considered quite affordable with almost three-quarters (73%) of tenants paying 30 per cent or less of their household income to housing costs (ABS 2021f). In 2021, the median rent for Coral Bay was $209 a week (ABS 2021f). Anecdotally, rents vary in Coral Bay from $450 per week for a two-bedroom villa to $100 per week for a one-room transportable rented from a landowning business.

There is a large discrepancy between the quality and cost of accommodation rented from landowning businesses compared to the lesser quality and higher cost of accommodation rented from non-landowning businesses—which is approximately $270 per week for a caravan or similar with access to a shared toilet and laundry. Rental accommodation is hard to find, with a vacancy rate of 0.3% in March 2025 (SQM Research 2025d) and only eight building approvals over the last six months (ABS 2024).

Factors that affect quality of life in regional Western Australia have been identified as:

- worker shortages
- shortage of available land
- access to affordable housing (DPIRD 2023).

Housing is regarded as a key component to developing strong regional economies in Western Australia. A state commitment to this is reflected by investment in infrastructure to support housing development (DPIRD 2023).

Figure A8: 'Big Brother' workers' accommodation in Coral Bay

Source: Photograph by Tod Jones.

The need to facilitate more worker accommodation in Coral Bay has been an ongoing issue for two decades. In 2004, it was noted that to be able to service the tourism population, rental accommodation to house an additional 400 semi-permanent workers—including partners and dependents—would be needed in Coral Bay (DPI 2004). There was no intention that this accommodation would be freehold (DPI 2004).

Recommendations for the placement of workers' accommodation were identified in the Coral Bay Structure Plan on land managed by the Baiyungu people (DPI 2004). This plan was further progressed in 2014 through the strategic planning document Coral Bay Settlement Structure Plan 2014 which again identified the need to *'further develop seasonal worker and permanent workers' accommodation'* (Shire of Carnarvon 2014). The planning issues and arrangements for the land for workers' accommodation are analysed in Chapter 6.

Workers' accommodation situation

Coral Bay residents have illustrative names for worker accommodation that reflect their differences and issues. Two dormitory-style arrangements for staff at a large resort park with shared amenities and little private space are called 'Big Brother' and 'Little Brother' (see Figure A8). 'Bayview Heights' is on a ridge above what was called Bayview Caravan Park (now Ningaloo Coral Bay) and is where some of the larger and more expensive accommodation used by more senior managers and staff is located (see Figure A9). 'Kenya' is down the hill from Bayview Heights at the back of the caravan park and has a range of transportable accommodation owned by non-landowning businesses that lease the land from Ningaloo Coral Bay. Residents of Kenya share a toilet block and live in close proximity. There is also a hostel that is used mainly by visitors.

There are two newer, purpose-built worker accommodation facilities. Pleasantville is a set of 37 one-bedroom and two-bedroom units owned by a subsidiary of the Baiyungu Aboriginal Corporation (BAC) and managed by the Department of Communities. These units were built by the state government to ease the accommodation crisis. Despite being designed for seasonal workers, they house business owners and more senior employees. The second purpose-built accommodation facility has the local name 'Neverland'—as no one thought it would get built. It was built as staff accommodation by the RAC for a resort it is currently building. It consists of 42 units and is the best worker accommodation in Coral Bay (see Figure A10).

There is an important difference between landowning companies and other businesses:

- landowning companies charge less for their accommodation—$100 per week for either a room or per person
- other businesses charge more—$270 for a caravan in Pleasantville, more for a unit.

Workers in these other businesses are also more likely to have quiet work periods, which lead to financial difficulties covering rent and groceries. Accommodation very much structures power relationships in Coral Bay, where employees rely on employers, and many business owners rely on a landowner for their workers' accommodation—and for their own.

The accommodation shortage in Coral Bay is severe. A number of businesses reported staff leaving due to the accommodation they were offered (SCB6, RCB2, RCB3, RCB4, RCB5). One manager stated:

> I've had good staff that I would love to keep, and they wanted to stay long-term, but I haven't been able to find them decent accommodation. So they've left. (SCB6).

Employers rely on friends from other businesses working extra hours when they are busy (RCB2). Businesses prefer to employ couples 'because I get two in one bed' (SCB6). Accommodation is only available for workers and, if a worker loses their job, they need to vacate their accommodation with as little as 48 hours notice. Cars are difficult to maintain in Coral Bay and workers may struggle to relocate to another town.

Figure A9: 'Bayview Heights' in Coral Bay

Source: Photograph by Tod Jones.

Figure A10: RAC workers' accommodation common area in Coral Bay

Source: Photograph by Tod Jones.

Crowding creates health risks. The lack of private space is a serious issue for senior workers and managers who are communicating and dealing with people all day, then often return to accommodation they share with their staff (SCB3). Mental health risks are one of the health concerns related to accommodation. Communicable diseases are an issue in Kenya because of the shared facilities and close proximity of other workers (RCB5, RCB6). Fire is also a risk, particularly in Little Brother (SCB3, SCB6) but also in other accommodation. One worker stated: *'I have one door, one entry. So if there's a fire, I ain't getting out. Most of these caravans and stuff, if there's a fire, they're not getting out'* (RCB6).

There are also hazards due to Coral Bay's location. There have been a number of mouse plagues connected to the weather patterns, and Coral Bay is in a cyclone-prone area. Workers were evacuated during Cyclone Olwyn in 2015 and stayed in the hostel as it was one of the few cyclone-rated buildings available.

In spite of these challenges and risks, Coral Bay offers WHMS and AS workers a strong and supportive community that one worker described as *'a really beautiful community aspect and really beautiful family vibes'* (RCB8) and *'a party town for a young person'* (SCB6). While our literature review identified gendered and racial stereotyping as issues in seasonal worker accommodation, there were no reports of this in Coral Bay, as such behaviour in workers' accommodation is quickly dealt with by senior workers (SCB6).

Barriers

Due to the shortage of land and existing accommodation, Coral Bay needs new accommodation. Participants in the focus group unanimously agreed that the most pressing issue in Coral Bay was developing workers' accommodation for business owners and senior staff who are permanent residents. Another option considered was a seasonal workers' park for workers who have their own campervans and caravans. This was considered possible but rated a much lower priority than permanent workers' accommodation.

There are two major barriers to expanding permanent worker accommodation, and several minor barriers.

The first major barrier is the cost of accessing land and building in a remote location. As demonstrated by the RAC's investment in workers' accommodation (see Figure A7), large businesses may invest in workers' accommodation. However, this is difficult for the majority of businesses in Coral Bay due to the expense and the risk of overcapitalisation (SCB4). There are returns on workers' accommodation through rent, but it will take many years for such an investment to break even.

The second major barrier is land availability (addressed in detail in Chapter 6). To summarise, there is land available that can only be used for workers' accommodation. There are other potential areas that were explored in the workshop, but this was the clear preference. An issue with the current arrangements in Ningaloo Coral Bay is the periodic tenancy agreement for leasing land, which is too short to acquire finance. Any lease arrangements for land need to be long enough for businesses to be able to borrow to cover the cost of building—either separately or collectively.

There are also some minor barriers to expanding permanent worker accommodation. Concerns were raised about the willingness of Coral Bay business owners to invest in a collective arrangement, or even to cooperate together. However, there are two factors that are likely to encourage collaborative engagement.

First, every land offering in Coral Bay for workers' accommodation has been quickly taken up. Capturing these opportunities will be challenging for SMEs unless they collaborate.

Second, there are a number of state-government housing programs that would look favourably on a scheme that encourages local business investment in workers' accommodation in a regional area with a desperate need for it. However, to access these funding streams, business owners need to cooperate with each other and come to terms with the planning settings for Coral Bay—which are more like the special arrangements at Rottnest Island or K'gari-Fraser Island than nearby towns. However, the enticement of guaranteed, quality accommodation and state investment could ease the adjustments needed for a collaborative approach.

Proposed pathways

The Coral Bay Focus Group indicated that there is a relatively clear pathway to workers' accommodation because of the dire need and small number of options. Participants recognised the benefits of a multi-business accommodation facility as it:

- reduces the cost of development

- matches the planning settings for Coral Bay—where no permanent residential accommodation is possible

- spreads risk

- helps unlock government programs by ensuring the accommodation is restricted to workers.

Table A14: Recommended pathways for Coral Bay

Recommendation/steps	Recommended lead/key players	Details
1. Develop a business cooperative organised through the Coral Bay Progress Association (CBPA) with the purpose of providing multi-business accommodation for permanent workers	CBPA	1.1 CBPA is well suited, as it is the most active local organisation and already coordinates business activity
		1.2 Business cooperative model to increase feasibility through a land-lease or purchase arrangement, state and federal funding and private investment
2. Work within current planning parameters		2.1 Essential to qualify for state support and strengthen funding applications
3. Engage/cooperate with key stakeholders	Gascoyne Development Commission (GDC), Shire of Carnarvon, Baiyungu Aboriginal Corporation (BAC)	3.1 GDC is well placed to assist with developing a cooperative model and applications for state and federal funding
		3.2 Shire of Carnarvon to provide planning advice and support, as well as access to some government funding
		3.3 BAC is majority shareholder of the landowner of the preferred site for workers' accommodation, to ensure that it is able to meet the expectations of the Baiyungu Community
4. State government intervention if CBPA/businesses do not act	State government	4.1 State government should lead an initiative to establish a housing cooperative in Coral Bay through a CHP
5. Potential to apply this cooperative model to other worker groups (if successful)	CBPA, GDC, BAC, Shire of Carnarvon	5.1 Cooperative model has potential to provide long-term benefits for businesses beyond accommodation

Source: Authors

Appendix 3: Victorian case-study 1

In Victoria, we focussed on the experience of PALM meatworkers in two rural Victorian towns. We chose to de-identify the towns due to workers' concerns about:

- potential retribution from employers
- potential loss of livelihoods.

There is credible evidence to support workers' concerns—and the refusal of employers to discuss worker accommodation and conditions with us adds weight to this decision.

Victorian case-study 1 focuses on a large rural town that is a centre for social services in the region and has a strong industry focus on agricultural production. The region's largest employer plays a central role in the local economy and employs a significant number of migrant workers on a variety of visas from various sending countries, some of which are PALM workers.

Workers' accommodation situation

Several interviewed workers were happy with their accommodation, particularly those that had a room to themselves: *'I have a single room, one person per room. However, some staying at [motels] share rooms, with two people per room'* (WV1-3). However, most preferred privately rented accommodation:

> Private accommodation offers a more peaceful environment. I disliked sharing a room with another person in the company accommodation, which made it hard to rest. Additionally, there were limited facilities, with only one kitchen for many people. (WV1-4)

Some workers were very happy with the repurposed student accommodation, as the environment was safe and secure.

Cost of accommodation

Many workers found rent too expensive. One interviewee reported that: *'current prices are skyrocketing … many workers struggle to pay these increased rates while also supporting their families back home'* (WV1-5). As another worker noted:

> Our main concern is about the rent, which increases every year. For example, when we arrived, the price per week was around $196. Recently, the company sent us a letter to sign, notifying us that the payment would increase to $202 and there was no negotiation. (WV1-2)

On the benefits of leaving employer-provided accommodation, one worker reported:

> *The company accommodation was more expensive than the private, but the downside of the private accommodation is that you have to manage everything yourself. The place I found myself, I think it's cheaper, better for me, and calmer since I live in a room by myself. (WV1-4)*

Statements by a local religious leader supported the workers' experience with accommodation affordability, stating that *'one of the reasons why they're keen to get out of even the [employer-provided] places, like the university accommodation, is they're looking for something cheaper, private and cheaper'* (SV1-3).

Local council representatives contextualised that state of the accommodation situation in the area:

> *A landlord that leases out to someone, and then that landlord will sublet to, say, three or four people, and charge like $200, $250, $300 a week rent, but it might be three bedrooms with six people … There's reports of seasonal workers walking around the town and knocking on [doors] looking for rooms and then getting a bonus from the employer if they locate accommodation. (SV1-1)*

Overcrowding and lack of privacy

The most common complaints about workers' accommodation were overcrowding and lack of privacy. One worker explained that shared rooms make it difficult to *'have private conversations about sensitive matters,'* and *'challenging for those on night shift to rest'* (WV1-5). Overcrowding also made sharing facilities difficult:

> *With four people in one room, it was very difficult. When we woke up to go to work, it was hard for us because we needed to shower, and we had to take turns. One would finish, and then another would take a shower. It was very difficult. (WV1-6)*

A community advocate also described potential reorganisation of accommodation by employers when compliance checks were made: *'They probably put less beds in when it's approved, but then when the workers come, they will probably put more beds in'* (SV1-2).

Facilities and resources

PALM workers faced issues with adequate access to facilities and resources. One PALM worker staying in a motel stated that they did not have access to a washing machine, so washed and dried all their own clothes by hand (WV1-1). The same worker also reported that although they had access to a shared kitchen, there was no rice cooker (WV1-1). In another accommodation, a worker related:

> *We were 17 people, and there were only two shower rooms and one kitchen. We didn't feel very comfortable. When we got hungry and wanted to cook, we had to wait in line because there were 17 of us. One person would finish cooking, and then the next could start. That was a big challenge for us. (WV1-6)*

Another worker reported:

> *The downside of living in [employer-provided accommodation) was the issue with cooking in the kitchen. The kitchen was quite crowded, and another issue was with the hot water for the shower. Sometimes, there was no hot water left for some of us. Those who woke up earlier could shower with hot water, but those who woke up late had to shower with cold water. (WV1-7)*

An advocate also expressed concerns about inadequate facilities:

> *If no one checks, they don't have proper bedding, like a thin mattress that's not comfortable. If you sleep on that type of mattress, you will get a sore body the next day. They will complain that they will be too cold. (SV1-2)*

Deductions

Many workers spoke about deductions from their wages for items that they needed to purchase for their accommodation. The most expensive of these items were mattresses, rice cookers, frying pans, plates and other kitchenware. PALMS regulations clearly state that these items need to be supplied by the employer, so there were clear violations of regulations occurring. Workers lack of knowledge about the standards meant they:

- did not contest these issues
- did not know how to complain about them.

Housing and visa vulnerability

There was a strong belief that if workers complained about their conditions, including housing, they would be seen as troublemakers and potentially *'miss out on the next assignment'* (SV1-2). A community advocate expanded on this fear, stating that while many workers know the accommodation standards, they would prefer that any complaints were made on their behalf. The official PALMS-appointed community workers were so overstretched that it was impossible for them to tend to workers in this way. Employers are expected to appoint a welfare office for PALM workers, but language barriers can impact their efficacy (SV1-2).

Engagement with local community

Local council representatives explained that they were aware of local community perceptions of migrant workers, stating:

> *Because housing is such a problem, there is community angst when they see other people taking housing or suddenly motels disappearing, and other businesses get angry because that industry's being taken out. So, there's a bit of angst [that can turn into ill-feeling for the workers] … Just [to] say their names is enough. They don't even have to see the person, just say an unusual surname. (SV1-1)*

A religious leader addressed the benefits of the PALM worker engagement with local community:

> *It's also good for them to have an Aussie experience and have the Aussies friendly, and I certainly tried to encourage that in the parish by having them sing at masses to highlight them a bit. (SV1-3)*

Vulnerability and barriers to medical services

One young worker kept getting a blood nose and wasn't feeling well enough to work. He was taken to the Emergency Department at the public hospital where he had to pay $700 up-front for some inconclusive tests. Workers' private health insurance requires them to pay up-front and he couldn't afford to get further tests.

As he still wasn't feeling fit enough for work, he was given an ultimatum by his employer: return to work, or resign and return to your country. As he considered what to do, the welfare officer pressured him to leave the accommodation saying: *'You're not working, so how will you pay for accommodation?'* Eventually he agreed to resign, adding, *'I'll go back to my country.'*

However, after recuperating, he ended up returning to Australia and working for another employer and having a worse relapse, this time ending up in hospital and being diagnosed with a brain tumour. He is now in a precarious visa situation, being sheltered by a community member and receiving life-saving treatment from a public hospital. As well as the cost issue, there is a three to six week wait to see a GP, and longer for new patients (SV1-1). One worker suggested that: *'when an accident happens at work, the company must prioritise medical check-ups and not send people to a massage shop, because we may have fractures or other injuries'* (WV1-2). A religious leader recounted:

> *I've taken them to Emergency when they are feeling sick, and they are asked for $700 up-front, and we've walked away rather than pay. But very often they've got to see a doctor or clinic to get a certificate, to show why they're away from work, but that's been hard to get. It's hard to get a doctor, clinics pass them on … (SV1-3)*

This issue was raised during a Migrant Workers Centre presentation. When workers were informed they were eligible for some sick days without a certificate, workers responded that if they took a sick day and did not produce a certificate, one of their personal-leave days was taken instead.

Labour exploitation

The nature of worker's accommodation experiences in V1 are reflective of wider systemic issues related to labour exploitation. One young man forced to resign because he was sick recalled:

> *The pressure of work was so hard, and the supervisors pushed you to work so hard. You have to work until the point of having run out of energy and no strength left. The speed of the line was so fast—there [were] no speed limits. (WV1-1)*

Another worker recalled a similar experience:

> *They only give us the most difficult and unpleasant tasks. So, the work assigned to us is equivalent to what two or three people should be doing. Sometimes, they leave us alone to handle everything. We end up working like machines. There was a moment when I worked so hard that I just broke down and cried. I really cried because, as newcomers, we had only been working for two or three months, yet they saw that we were fast and efficient. Despite that, they never sent anyone to help me. I was completely alone at the machine. I had to pack multiple boxes—sometimes 10 at a time— all by myself. In front of me were seven or eight more boxes waiting. I had to move quickly because there were two big machines running, with two people feeding them materials. But I was the only one packing everything. The machines kept running at full speed, and since I was alone handling the packing, it was overwhelming. (WV1-8)*

These sorts of labour practices have been reported in the media previously, but it is not clear if any action has been taken. Workers were not aware of the current welfare officer, as is required by the PALMS regulations, and another worker explained that their employer had not put them in contact with any local community services— and that only one local religious leader helped them (WV1-2).Another worker explained how they have their own 'community structure' and a leader from who they can seek help (WV1-7).

Barriers

Local stakeholders outlined that the current housing crisis in V1 serves as a significant barrier to effectively addressing workers' accommodation needs. An interviewee described the situation in V1 as the *'perfect storm,'* resulting from decades of policy *'missteps.'* They said:

For over 30 years, land has been drip-fed into the market, basically to drive property prices up to balance demand, and always the supply is less than what the demand is, so the price keeps going up … The generic way in which housing has been dealt with in Australia—a one-storey home with three bedrooms and a backyard for a BBQ—must change. (SV1-1)

Community resistance to alternative housing models that could potentially better accommodate PALM workers was another barrier. While *'high-density accommodation'* was identified as a potential avenue to explore, one stakeholder acknowledged that *'the community is not ready … there is a lot of community angst and negative reaction when anything of that kind is proposed'* (SV1-1).

Stakeholders also raised concerns that solutions proposed by private businesses, while helpful to their own employees, would *'only cater to their industry,'* and leave other industries struggling. An absence of coordination between major players is a clear barrier to addressing accommodation issues, where fragmented efforts are seen as a hindrance to community-wide solutions. Further, private businesses who initiate building their own accommodation feel that they face rising costs and lengthy delays in planning and approvals.

Proposed pathways

Table A15: Recommended pathways for V1

Recommendations	Recommended lead	Details
1. Enhance understanding of accommodation issues among workers, and ensure their needs are heard	Employers, accommodation providers	1.1 Develop accessible housing literacy/ support programs to improve workers' understanding of standards, their rights and options.
		1.2 Workers should be given simple accommodation regulation checklists in their own languages as part of pre-departure processes so they can check if accommodation meets standards.
2. Improve coordination between private and public entities	Federal, state and local government. Employers and accommodation providers	2.1 Streamline and harmonise communication flows between federal and state-government agencies with local governments actors
3. Consider alternative accommodation practices/models	Local government	3.1 Explore viability of long-term options such as high-density accommodation, and building upwards rather than outwards (the use of air rights)
4. Improve monitoring/policing of standards	Federal, state and local government. Employers and LHPs	4.1 Enforce regular inspections
		4.2 Ensure workers have access to cultural mediator and supporting organisations

Source: Authors

Appendix 4: Victorian case-study 2

In Victoria, we focussed on the experience of PALM meatworkers in two rural Victorian towns. We have chosen to de-identify the towns due to workers' concerns about:

- potential retribution from employers

- risk of loss of livelihoods.

There is credible evidence to support their concerns—and the refusal of employers to discuss worker accommodation and conditions with us adds weight to this decision.

Victorian case-study 2 was a medium-sized regional town featuring recreational and historical tourism sectors. The town's main industry is manufacturing—including meat processing. The town is currently experiencing a significant rental crisis. The nearly 200 PALM workers currently employed in the town arrived during the COVID-19 pandemic, when a shortage of other types of workers induced a focus on the PALM scheme.

Workers' accommodation situation

Lack of transparency in pre-departure and arrival processes

In V2 the labour hire provider (LHP) conducted health and police checks, as well as inductions in the workers' home country. Further induction sessions were then conducted at the LHP head office after the workers arrived (SV2-2). However, insight from workers makes it clear that this process needs to be more comprehensive, and conducted over a longer period. As one worker explained:

> I think before we came over, when Foreign Affairs [DFAT] gave us those contracts and we signed the contracts, most of the people didn't know how to read and write so they didn't understand English. All the contracts were in English, and they gave us these forms and they didn't explain anything in the contract. Most people were only thinking about going to Australia, that's all they think about, they sign the contract but they had no idea, they didn't know what they were signing and then when they come over here they face the reality of what is in the contract and then they start to complain but then it's too late, they have already signed the contract. It would be better if our people were more properly informed. (WV2-2)

Initial travel, visa and accommodation costs are covered by the LHP but workers pay back all the money they owe through deductions from their wages over the first 14–16 weeks (SV2-3).

A local housing advocate stated that while workers signed one contract in the sending country, *'when they arrived in Australia, they had to sign a second one, which then took deductions off their wages, that they didn't know about'* (SV2-7). The period of paying back travel and visa costs was a source of frustration for workers. Workers argued that they were not adequately informed of the process, and that they paid *'much more [rent] than they described to us'* (WV2-2).

Employee relations

Employers and labour-hire firms claimed that workers were able to discuss concerns and issues with them. However, the issues they identified did not align with those communicated by workers—which suggested a gap in their knowledge of the workers' lived experiences.

One advocate felt that labour-hire firms lacked literacy in cross-cultural relations, and were largely ineffective at communicating with workers or understanding their needs (SV2-6). The advocate reported that a common worker complaint was perceived excessive wage deductions, with workers claiming to them *'that about half their wages are deducted'*. The same advocate estimated that weekly deductions for workers in V2 were:

- $110–$180 per week for accommodation
- $30–$41 for accommodation expenses
- plus variable fuel costs.

One worker summarised the sentiment: *'There is a lot of hidden costs that they never tell us at home that we face here … those bills come in and we didn't expect them'* (WV2-2).

The advocate also felt working conditions were racialised, with harsher work conditions being endured by migrant workers (SV2-6). Workers reported that labour-hire firms did not consistently respond to their concerns, and had shut down a Facebook messenger group when workers started to openly voice concerns (WV2-1). He added that *'they [employer/LHP] only give us information at the last minute'* (WV2-1).

An advocate explained that PALM workers were more vulnerable to poor quality housing conditions than local renters, as their livelihoods are also tied to their accommodation—which rendered them doubly hesitant to raise complaints (SV2-7). There was a consensus among advocates that PALM workers were generally hesitant to approach their employer with concerns, out of fear it could negatively impact their employment and visa status.

Worker wellbeing and pastoral care

The PALM scheme information claims that PALMS employers must conduct *'at least fortnightly meetings face-to-face with Workers to check their progress and enable them to raise any concerns'* (DEWR 2023b), but neither employers, LHPs or workers made mention of discussions occurring at this frequency during interviews. Although employers are also required to appoint a welfare and wellbeing officer within the organisation to help and support workers, workers in this case study were not aware if there was one or who it was. This appears to have been the responsibility of the LHP, but that service appeared uneven, depending on quality of worker, and with a high staff turnover was generally inadequate.

Community advocates and religious leaders were extremely concerned about the detriment to mental health associated with lack of community, spiritual connection, and cultural safety, compounded by feelings of:

- homesickness
- loneliness
- exhaustion from physically demanding work.

Advocates were also worried about lack of access to health services, specifically lack of knowledge about:

- sexual reproduction health
- local driving laws and regulations.

Employers were also worried about workers taking drugs. Religious leader shared concerns about alcohol and risk-taking among the PALM worker community.

Workers' knowledge or experience of pastoral services did not extend past the limited services offered by the LHP, and personal community relationships—including connections with local religious and sports groups.

Local religious leaders said workers needed more avenues to discuss concerns together as a community. A religious leader from the sending country explained that traditional elders, who are usually responsible for leading communities, were missing from worker communities, and should be appointed and resourced (SV2-9). Conversely, an Australian community advocate felt that workers needed to be empowered to be able to advocate for themselves. They noted that union membership was low because workers:

- were warned by LHPs not to join unions

- were hesitant to sign up for any further deductions from their pay (SV2-6).

All stakeholders were concerned with ensuring there was gender segregation in accommodation, and romantic relationships were not encouraged. Others were concerned that women were rarely present at public events, and identified that women were very cautious about going out.

Community engagement

One employer representative suggested that language difficulties and initial culture shock might affect workers' relations with local community, but that community engagement was increasing with sporting clubs and friendships at work. This was supported by several workers who mentioned links with soccer clubs, and by religious leaders who emphasised worship and connection.

The Community Connections Coordinator for Victoria is contracted by the DEWR PALM scheme to provide *'positive relationships between PALM workers and their local communities, helping workers settle into life and work in Australia'*.[11] Located in another state, the coordinator worked in a .6 position (i.e. three days a week) providing this service to approximately 6,000 workers across several hundred sites. This under-resourcing suggests why workers were not aware of the service.

A year after the PALM workers arrived in V2, local community members were concerned that there had been no public acknowledgement or welcome for the newcomers, and organised a picnic attended by half the workers and a similar number of local community members. The local attendees included representatives from the local churches, the Community House, the local multicultural services, Safe Space, the Shire Council, local choirs and arts groups, the football club, and the labour hire provider (LHP) and employer. One of the main organisers expressed concern about the lack of input from either the LHP or the employer. They felt that the LHP's insistence on everything going through them to workers had created a bottleneck that meant that community assistance was not getting through effectively (SV2-7).

Caravan-park conditions

Employer staff advised that 60+ PALM workers live at a local caravan park but that there was overcrowding in cabins and very little communal space, so most workers were keen to move out to a house. The caravan park was the site of many complaints about inadequate infrastructure and facilities. However, overcrowding, lack of privacy and costs are the leading causes of concern among workers. It was established knowledge among all involved stakeholders that crowding was rife in the caravan park. Employer staff held concerns that the overcrowding *'leads to behavioural problems like drinking. This gets the local community offside, and our business gets a bad reputation'* (SV2-2).

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11 https://www.palmscheme.gov.au/worker-support

One worker described the cabins in the caravan park as *'like living in a box. You are resting in a box for one person,'* adding that while cabins were *'meant only for one or two people and they have four, and they are swapping out the single beds and putting bunkbeds in so they can fit more people in'* (WV2-1). Caravans are also too hot in summer and too cold in winter. Workers were particularly concerned with the cold, with one worker revealing that they were sometimes too cold at night to go to sleep (WV2-2).

Caravan-park costs

All informants—including community advocates, religious leaders and employers—agreed that workers living in the caravan park were being overcharged. A representative from the LHP advised that workers rent directly from the owner of the caravan park who is *'making a lot of money',* and estimated that at $193 per week per worker, the caravan-park owner's income was over $50,000 per month (SV2-3). Another interviewee added context, stating:

> *Before LHP took over that caravan park, those caravans were going for $200–$300 a week. And then once the PALM workers came, there was a change in the lease arrangement and they went up to $800 [per week] (SV2-7).*

This indicates that PALM accommodation is more profitable than comparable accommodation available through the rental market.

Share houses

The LHP organised *'upgrading'* to a share house on a *'first in, first out'* principle. One informant speculated that the LHP had an arrangement with a local real estate agent to secure priority access to available rental properties. They said:

> *LHPs are managing to access accommodation or expropriate accommodation that was there for general community or crisis transition housing. And they seem to be able to access rentals that other people haven't managed to access. (SV2-7)*

The LHP negotiates leases with the agent, and then separate leases are drawn up for each worker and money is direct-debited from their pay. Employer staff advised:

> *We have about 14 houses in town, some owned by the company—six houses owned by the company but four houses were for the women seasonal workers originally—one in G. and one in C. We have five homes in B, and we rent direct from a guy who is buying up homes for this purpose. It's about $180 per week per worker, two to a bedroom, including internet and all utilities and they have the heating up high most of the time. (SV2-2)*

Workers were relieved and happy when they finally got into a house. One worker outlined the value of gaining access to a house, stating: *'We need our own rooms for privacy purposes and then it's easy to keep the room clean. I think that is the best type'* (WV2-3). Workers were much more content to pay shared rents in private rentals organised by the provider, but were still concerned with the cost of bills. The cost of one share house was approximately $500 per week. A worker outlined their costs in a house:

> *We divide the cost of $500 a week between the five of us, so each resident paid $107 each week, but we also paid bills separately from the rent. (WV2-1)*

While most houses were considered reasonable quality, some were also described as *'shoddy and substandard'* (SV2-6). There were concerns expressed by advocates and workers about inadequate heating and cooling systems.

Workers preferred having their own rooms in rental accommodation. One worker remarked that sharing rooms is *'hard when you come home to sleep, and the other one is still talking on the phone … We don't have enough time to rest'* (WV2-2).

Putting incompatible people together in shared housing was another issue raised by workers. Incompatible differences were primarily based on ethnicity, religion, moral standards and age. Another worker shared a house with his wife and other male workers and—even though they had their own ensuite—sharing everything with the other men was clearly difficult for his wife. However, the cheaper rent overall made it better than the caravan-park accommodation.

Transport

PALM workers are frequently *'accommodated in isolated circumstances and given limited access to mobility'* (SN2). Without reliable transport, workers faced difficulty accessing essential services and shops, as well as social, community and religious connections. When workers in isolated areas did have access to transport, it was often closely regulated and controlled by the employer. Transport also came at an extra cost, as an employer explained:

> *Work buses supplied by [the LHP] cost workers $70 per week [per person] plus petrol and insurance. Workers were responsible for driving but [the LHP] felt workers didn't look after the buses and got speeding and traffic fines. (SV2-2)*

Workers held concerns regarding both the cost, and the safety of their transport situation. A worker said:

> *It was $34 at first, and then they say, 'That's too cheap', and put it up to $70, each person each week for one bus [i.e. 12 people for each bus at $70 per person]. The PALM workers drove the bus. I drove one of the buses, but then I gave it back because they didn't help me to apply for my license when the six months elapsed. I just gave back the keys and everybody stop … maybe only two buses stayed. (WV2-2)*

The worker explained that the LHP didn't offer any driving-related lessons or information. A community advocate explained that in one extreme case, a PALM worker had absconded after accruing $2,500 worth of traffic fines.

Barriers

The local council advised that the housing shortage was already accelerating in the Shire before the COVID-19 pandemic, but hit crisis point afterwards with the rapid shift to work from home and the permanent move of tree-changers into the area. A council representative said that two waves of change crashed together: accommodation shortage and the recruitment wave. There is an extremely low vacancy rate of less than 1 per cent for all rental stock.

The structural barriers for availability were identified as being related to the supply chain of provision of housing—there aren't enough houses being built. The housing advocate explained:

> *I think it's the lack of affordable, appropriate housing. We need 600 more social-housing units in this Shire. We've got about 180, so we need four times that. Wages and pensions not going up and [we have] a total mismatch of housing supply and demand. Thirty-three per cent of our households are one person but we've got 2 per cent one-bedroom units and maybe 15 per cent two-bedroom units. (SV2-7)*

There were also safety concerns lingering from recent floods. The housing advocate said:

The caravans were majorly impacted by the floods. There was a whole heap of concern around mental health because some of them were just sleeping on the floor in a room up at the factory … the community wanted to support them but [couldn't] again. Emergency Management were meant to go through the LHP, and it was all clunky. (SV2-7)
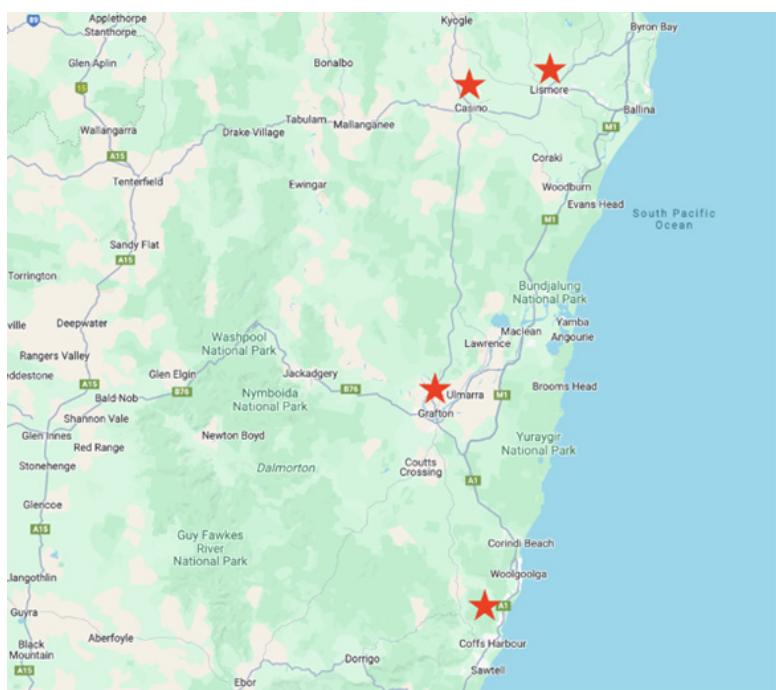
Proposed pathways

Table A16: Recommended pathways for V2

Recommendations	Recommended lead	Details
1. Improved monitoring/policing of regulations	Federal, state and local government. Employers and LHPs	1.1 Enforce regular inspections
		1.2 Ensure workers have access to cultural mediator and supporting organisations
2. More adaptive reuse of pre-existing infrastructure	Employers/accommodation providers	2.1 Establish inventory of surplus commercial and former education facilities across the state
		2.2 Incentivise developers to embark on and invest in adaptive reuse and conversion
3. Explore home-share and lodger solutions	Local government	3.1 Expansion of existing community programs in V2 that saw locals and migrant workers mutually benefitting from home-share schemes

Appendix 5: Mobile PALM workers in northern New South Wales case study

Figure A11: Northern New South Wales case-study areas

Source: Google Maps (2025).

Accommodation

Coffs Harbour

The 'Coffs Harbour' case-study area is located 530 km north of Sydney and covers an area of 3,966km² (Figure A12). The ABS Statistical Level Area 3 encompasses two local government areas: City of Coffs Harbour and the Shire of Bellingen.
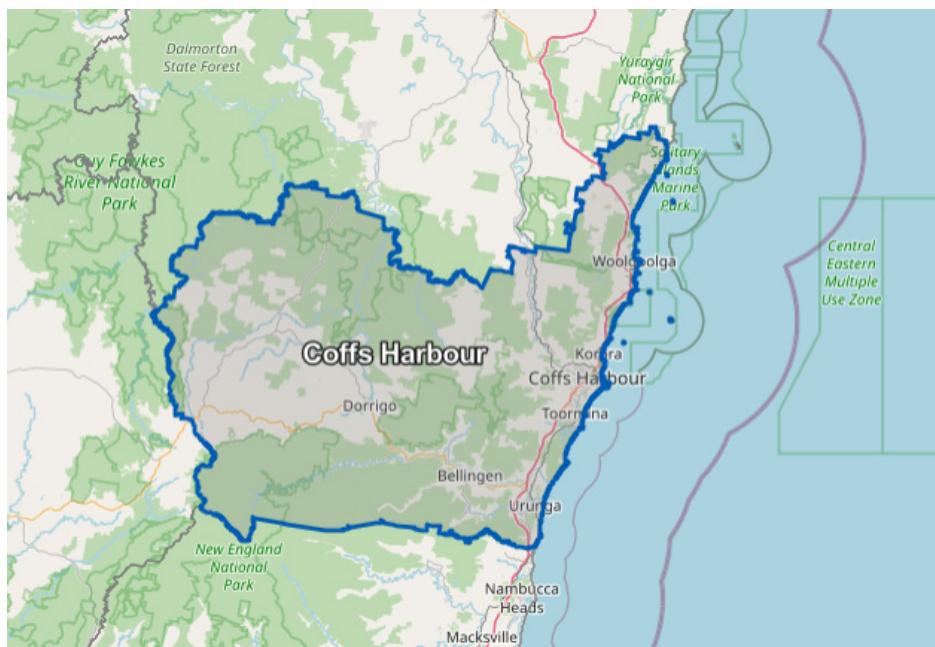
The case-study area includes two distinct profiles, both located on the mid-north coast of New South Wales.

- The City of Coffs Harbour is an established coastal urban centre with a strong agricultural, manufacturing and tourism employment base (New South Wales Government 2023c).

- The Shire of Bellingen is dominated by timber industries, dairy production and meat processing, with some emerging tourism elements (New South Wales Government 2023a).

More broadly, the major industries that define the Coffs Harbour case-study region are:

- healthcare and social assistance: 19%

- retail trade: 10%

- construction: 10%

- education and training: 10% (ABS 2021e).

Figure A12: Coffs Harbour Statistical Area Level 3
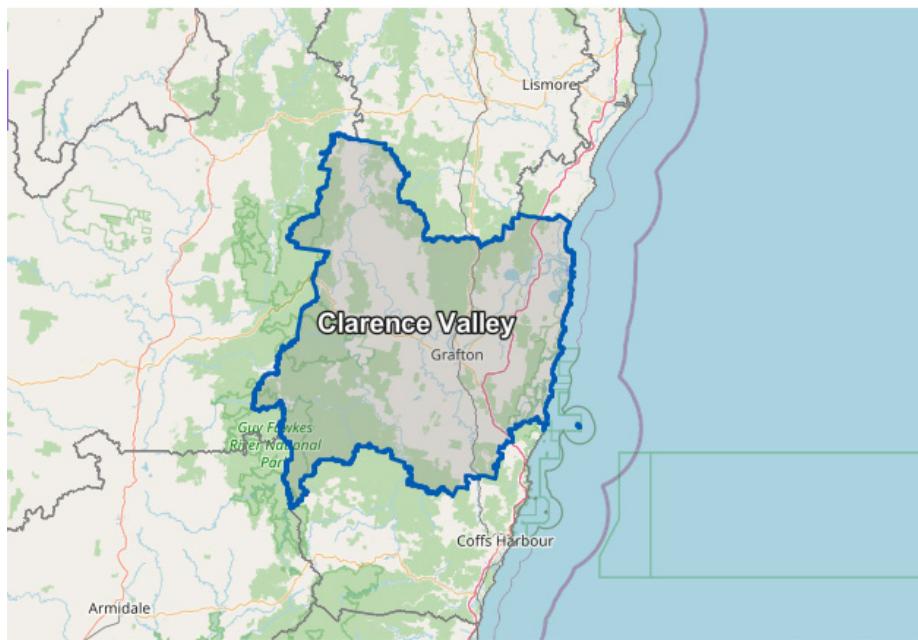

Source: Google Maps (2025).

Clarence Valley

The 'Clarence Valley' case-study area is located 620 km north of Sydney and covers an area of 9,263 km^2 (Figure A13). The ABS Statistical Level Area 3 closely mirrors the jurisdiction covered by the Clarence Valley Council local government area. Located on the New South Wales mid-north coast, Clarence Valley Council has strong agricultural, forestry and fishing industries, as well as service, retail and tourism (New South Wales Government 2023b).

More broadly, the major industries that define the Clarence Valley case-study region are:

- healthcare and social assistance: 17%

- retail trade: 11%

- construction: 9%

- public administration and safety: 9% (ABS 2021c).

Figure A13: Clarence Valley Statistical Area Level 3

Source: Google Maps (2025).

Richmond Valley – Hinterland

The 'Richmond Valley' case-study area is located 730 km north of Sydney and covers an area of 7,390 km² (Figure A14). The ABS Statistical Level Area 3, known as Richmond Valley—Hinterland encompasses three local government areas in the Northern Rivers area of New South Wales: Richmond Valley Council, Lismore City Council, and Kyogle Council.

The Richmond Valley case-study region has three distinct profiles.

- Richmond Valley Council includes the urban centre of Casino. It is characterised by the natural beauty of the coast, as well as the rivers and inland areas (New South Wales Government 2023f).

- To the north-east, the Lismore City Council is bound by rainforests and the ocean with the main urban centre of Lismore providing a range of functions—including education, entertainment and business opportunities; it also offers health and retail facilities (New South Wales Government 2023e).

- The Kyogle Council covers the jurisdiction to the north-west of the Richmond Valley case-study area (New South Wales Government 2023d). With old-growth forests and World Heritage–listed natural attractions, Kyogle Council is a rural area with agriculture, timber, cattle and tourism industries (Kyogle Council 2025).

More broadly, the major industries that define the Richmond Valley case-study region are:

- health care and social assistance: 20%

- retail trade: 11%

- education and training: 10% (ABS 2021h).

Figure A14: Richmond Valley - Hinterland Statistical Area Level 3

Source: Google Maps (2025).

Background

As interviews of PALM workers unfolded, feedback became saturated on the same core issues:

- poor quality of accommodation
- lack of privacy
- excessive deductions
- isolation
- inability to voice concerns when they arose.

As a follow-up, we pivoted to interviewing key stakeholders including local councils, advocacy groups (which were mainly church groups), and support organisations with a specific remit to oversee matters concerning PALM workers. This helped capture top-down perspectives important for informing the structural changes.

At the end of January 2025, there were 5,620 PALM workers stationed in New South Wales, most based in the northern and southern agricultural regions. This made up one of the larger cohorts by state, with just under 20 per cent of total PALM workers in Australia. Ascertaining the exact numbers of PALM workers at the various locations was challenging because of the extent to which workers were mobile during the term of their contracts. This largely applies to workers in the horticultural sectors, such as fruit pickers, and not so much to workers in abattoirs who are stationed in one place for the entirety of their contract.

In the 2024 report, *Be Our Guests: Addressing urgent modern slavery risks for temporary migrant workers in rural and regional New South Wales*, the Office of the New South Wales Anti-slavery Commissioner made several key points, as follows.

- New South Wales benefits from the contributions of temporary migrant workers in agriculture, horticulture, meat processing, cleaning, hospitality, retail and tourism.

- Temporary migration is largely well managed. It benefits workers, their communities of origin, businesses in rural and regional New South Wales, and the communities in which workers live temporarily as guests. T

- here is an increasingly urgent need to address the situation of a minority of low-wage temporary migrant workers in New South Wales who face risks of debt bondage, deceptive recruiting, forced labour—and, in extreme cases, servitude, sexual servitude or even human trafficking.

The report from the Anti-slavery Commissioner signals a heightened concern that compliance by employers remains contentious—despite the regulations.

Despite this, the challenges of securing appropriate and suitable housing for seasonal workers come at a time of unprecedented housing affordability and supply crises for communities across regional New South Wales. This put added pressure on rural housing stock that is immensely constrained. Accordingly, the REA Group Rental Affordability Report confirms that New South Wales is experiencing the worst rental affordability crisis on record (Moore and Ryan 2024).

Workers' accommodation situation

Contestation and competition for housing come down to the ability to access affordable and secure housing that is located in work locations where seasonal workers predominate (Welcoming Australia 2024). Added to this is the inability of local councils and the NSW agricultural sector to incentivise property developers to invest in housing for seasonal workers because of the inferior returns on investment likely (SN6). As a result, accommodation availability and affordability for PALM workers in New South Wales is dire. Chronic shortages result in temporary and short-term fixes including:

- accommodation fashioned out of shipping containers

- temporary facilities such as redundant schools, council buildings and a hostel (SN4).

Moreover, PALM workers dedicated to horticulture work are regularly on the move, which means that securing permanent housing is an impracticable constraint because of the limited options available (SN4). This is further exacerbated because their work usually takes place in remote rural locations, away from populated town centres where services and interaction with local communities are possible (SN2). The lack of public or private transport further hinders any socialisation that might be possible. Key themes that emerged are outlined below.

Excessive deductions for housing and other expenses

What is considered unfair and excessive payroll deductions from PALM workers' wages? This is a recurring theme in much of the extant research, public commentary and advocacy on migrant workers' wages. For example, the president of Timor-Leste, Jose Ramos Horta, recently weighed in on the topic, arguing that his compatriots working in the PALM scheme were subject to unfair treatment: *'unscrupulous employers are exploiting workers from [Timor-Leste] by overcharging them for accommodation and transport'* (Dziedzic 2024).

A key advocacy organisation (SN2) reiterated the prevalence of institutionalised excessive deductions from PALM workers' pay packets, reiterating that the deductions made are excessive and unreasonable. This is worsened by workers often being captive to their employers, who insist that:

- they must stay in employer-arranged accommodation

- they have no alternative but to agree with the proposed deductions.

To make matters worse, workers report that they have no leverage to negotiate housing costs, and that what they are being charged is the appropriate going rate (SN1).

Poor quality of housing

In keeping with much public discussion and advocacy, a regular complaint was that the quality of housing tended to be substandard and overpriced. Typically, there were contentions around:

- the lack of privacy
- overcrowding
- the lack of appropriate heating and cooling
- the rudimentary nature of toilet and kitchen facilities
- the constraining nature of employer rules, which made socialisation difficult:

> *The PALM scheme accommodation settings are too expensive, sharing [with] up to 12 people, sleeping in bunk beds [that] are uncomfortable, couch or in the kitchen, too many rules that are unfair. Sometimes the AC is not working, very hard for us to sleep. (WN5)*

Evidently, what PALM workers are paying for accommodation and what they are getting in return suggests poor value for money. A PALM worker's complaint epitomised this:

> *Paying $150/week sharing between 10 of us in same cabin, no privacy. Sometimes it's hard to rest and sleep properly, especially if the bunk bed is near the heater or aircon—either too cold or too hot right next to the aircon. We must walk to the toilet or kitchen in the rain and cold without any shelters or shades to walk outside our cabin. (WN1) (See also Figure A15.)*

These arrangements made socialisation and harmonious living difficult and often led to conflicts among PALM workers (SN2).

More recently, there have been moves to give PALM workers more autonomy over the choice of accommodation, with some workers opting to stay in pubs and hostels in town areas (SN7). However, this can present logistical issues, especially if their work takes place in remote locations and if they are unable to secure regular and reliable transportation. For workers who are mobile and move according to employer harvest priorities, choosing their accommodation is a practical challenge, given the out-of-the-way locations they usually work in.

Figure A15: International shipping container accommodating up to 12 workers, Casino, New South Wales

Source: Photograph by Sr Denise Laverty.

Isolation from the local community

Many workers lamented they had little opportunity to integrate with the local community because:

- of their isolation and lack of transport options
- of employers who would forbid them from going into town, unless shopping for food (WN4).

One community worker blamed the social isolation felt by PALM workers on the inability of local governments to know the number of seasonal workers within their jurisdiction, blaming the lack of communication between DEWR, visa-issuing agencies, employers and local government (SN4). This goes against the sociality of Pacific islander communities, where community gatherings and participation in group activities are norms—such as in sporting clubs or during special occasions.

The lack of forewarning about the presence of PALM workers in the local area meant that the local councils were unable to provide the services typically required, including:

- health and wellbeing services
- community support mechanisms
- connections to churches and sporting clubs, among others.

An advocate for workers (SN2), highlighted the link between isolation and the lack of transportation: *'When they're accommodated in isolated circumstances and given limited access to mobility, you know these are not places where public transport operates.'* While many community members expressed interest in socialising with PALM workers, and vice versa, how this can be arranged in a manner that overcomes practical constraints of access to transport and distance travelled remains a formidable obstacle (SN2).

Limited wellbeing support for workers

Overall, PALM workers expressed overwhelming reluctance to complain or seek better conditions because of the fear of compromising their contracts (Office of the NSW Anti-slavery Commissioner 2024). As a result, when it came to their wellbeing, in cases of illness or personal problems, they had little support. As one community support worker (SN3) said: *'I know that they suffer from fatigue and mental health problems. They are more isolated than any other group of people from their family.'* As a result, poor access to medical care exacerbates health outcomes for PALM workers (SN1).

The stigma of being a PALM scheme worker also creates considerable uncertainty, and can manifest in reluctance to try and engage with the local community. This is made worse by the politicisation of immigration and migrant workers (Office of the NSW Anti-slavery Commissioner 2024). This was evident in a recent raid in western Sydney looking for undocumented former PALM workers. In some instances, this has resulted in a growing aversion to hiring PALM workers, potentially leading to increased marginalisation of those currently in-country (SN1).

Barriers

Overall, a key barrier expressed was the issue of bureaucratic inertia, all the way from the federal government to state and local governments (SN2). There is a great deal of confusion around who is responsible for managing the processes related to the engagement and placement of PALM workers and ensuring sufficient compliance is achieved (SN1). The high cost of accommodation means that PALM workers are priced out. Unless housing subsidies are offered, they will be left with whatever accommodation remains, and be housed via precarious and insecure means (SN1).

Another key barrier was the difficulty of incentivising developers and assuring them of a better return on workers' accommodation—which remains a considerable challenge (SN2). With wider issues of housing supply in rural New South Wales, innovative business models that are in some part supported and underwritten by local councils and state governments seem necessary (Office of the NSW Anti-slavery Commissioner 2024).

How to ensure compliance with the array of regulatory requirements relating to accommodation for PALM workers remains a sticking point. The DEWR maintains a team of compliance officers monitoring and assessing the provision of accommodation to PALM workers in some of the more remote locations in New South Wales (SN7). However, this is made more difficult when PALM workers are moved from one worksite to the next, as in the northern New South Wales case, and where temporary accommodation is the norm, including shipping containers and dongas.

Proposed pathways and recommendations

Increased compliance from employers resonated in stakeholder discussions. There were strong expressions that there are enough regulations in place and that the sector is highly regulated. The argument was that ensuring more widespread compliance and weeding out problematic approved employers is pressing (SN1). Others have argued that rather than rely on federal authorities to ensure compliance, local councils should have a bigger role to play (Welcoming Australia 2024).

The issue of striving for adaptive reuse of pre-existing infrastructure such as schools and disused commercial buildings is also seen as a possibility.

Table A17: Recommended pathways for New South Wales case-study regions

Recommendation	Recommended lead	Details
1. Improve compliance of employers with accommodation regulations	Local government	1.1 Assign compliance responsibility to local government supported by federal and state-government funding mechanisms
		1.2 Streamline and harmonise communication flows between federal and state-government agencies with local government actors
2. Incentivise developers to invest in new builds	Federal and state government	2.1 Formulate and apply tax mechanisms to help make investments in seasonal worker accommodation more viable for developers
		2.2 Formulate and apply tax mechanisms to encourage employers
3. Encourage adaptive reuse of pre-existing infrastructure	Local government	3.1 Establish inventory of surplus commercial and former education facilities across the state
		3.2 Incentivise developers to embark on and invest in adaptive reuse and conversion

Appendix 6: Interview and focus groups participant codes

Table A18: Interview participants' codes

Interviewees	Coral Bay	Margaret River Region	V2	V1	NSW
Seasonal workers					
AS workers	RCB1, RCB2, RCB3, RCB4, RCB5, RCB6, RCB7, RCB8				
WHMS workers		WMR1,WMR2, WMR3,WMR4, WMR5,WMR6, WMR7,WMR8			
PALM workers			WV2-1, WV2-2, WV2-3	WV1-1, WV1-2, WV1-3, WV1-4, WV1-5, WV1-6, WV1-7, WV1-8	WN1, WN2, WN3, WN4, WN5
Stakeholders					
Local government	SCB1	SMR1, SMR2, SMR3	SV2-1	SV1-1	SN1
State government	SCB2 SCB8	SMR4, SMR5			SN2
Local business owners	SCB3, SCB4, SCB5	SMR8, SMR9, SMR10, SMR11	SV2-2		
Accommodation	SCB6, SCB7	SMR6, SMR7			
Migration/ labour agents			SV2-3		
NGOs/ community organisations		SMR12, SMR13	SV2-4, SV2-5, SV2-6, SV2-7, SV2-8, SV2-9	SV1-2,SV1-3	SN3, SN4
International	IE1, IE2, IE3				

Source: Authors

Table A19: Focus group codes

Location	Focus group code	Participant type	No. of Participants	Participant codes
Coral Bay	FCB1	Stakeholders and residents	6	P1-FCB1 to P6-FCB1
Coral Bay	FCB2	Stakeholders and residents	5*	P1-FCB2 to P5-FCB2
Margaret River	FMR	Stakeholders and workers	9	P1-FMR to P9-FMR
Victoria	FVIC	Stakeholders	3	P1-FVIC to P3-FVIC
National	FNAT	PALM workers	17	P1-FNAT to P17-FNAT

*Note: *Two participants from this group also attended the first Coral Bay Focus Group.*

Source: Authors

Appendix 7: Safe Work Australia Code of Practice guidelines

Table A20: Safe Work Australia Code of Practice guidelines for accommodation outside of towns and metropolitan areas

Accommodation should be separated from hazards at the workplace likely to adversely affect the health and safety of a worker using the accommodation.

The accommodation facilities should also:

- be lockable, with safe entry and exit
- meet all relevant structural and stability requirements
- meet electrical and fire-safety standards
- have a supply of drinking water
- have toilets, washing and laundry facilities
- be regularly cleaned and have rubbish collected
- be provided with sleeping quarters shielded from noise and vibration
- have crockery, utensils and eating facilities
- have lighting, heating, cooling and ventilation
- have storage cupboards and other furniture
- be provided with a refrigerator or cool room, and
- have all fittings, appliances and equipment in good condition.

Source: Safe Work Australia (2020).