



TO: Ministry of Business, Innovation & Employment
rsepolicyreview@mbie.govt.nz

DATE: 24 April 2023

SUBMISSION ON: Recognised Seasonal Employer Policy Review



**THIS SUBMISSION IS SUPPORTED
BY THE FOLLOWING:**

- Zespri International Limited (Zespri)
- Māori Kiwifruit Growers Inc (MKGI)



NEW ZEALAND KIWIFRUIT GROWERS INCORPORATED

New Zealand Kiwifruit Growers Inc (NZKGI) is mandated under the Commodity Levies Act 1990 to advocate on behalf of New Zealand kiwifruit growers and does this by representing the commercial and political interests of kiwifruit growers in industry and government decision making. While this submission is on behalf of New Zealand kiwifruit growers, NZKGI has also encouraged growers to make their own submission.

ZESPRI INTERNATIONAL LIMITED

Zespri is the world's largest marketer of kiwifruit, accounting for about one third of global kiwifruit trade, with a premium high-value proposition. Zespri is 100 percent owned by current and former kiwifruit growers and has a global team of more than 800 based in Mount Maunganui and throughout Asia, Europe and the Americas. Zespri's purpose is to help people, communities and the environment around the world thrive through the goodness of kiwifruit, and Zespri works with 2,800 growers in New Zealand and 1,500 growers offshore to provide consumers with fresh, healthy and great-tasting Zespri™ Green, RubyRed™ and SunGold™ Kiwifruit. In 2021/22, Zespri supplied over 200 million trays of kiwifruit to consumers in more than 50 markets, and recorded global operating revenue of NZ\$4.47 billion.

MĀORI KIWIFRUIT GROWERS INCORPORATED (MKGI)

Māori Kiwifruit Growers Incorporated (MKGI) is an organisation representing the interests of Māori kiwifruit growers in New Zealand. Established to support and advocate for Māori growers in the kiwifruit industry, MKGI works to ensure that their members have a voice in the decision-making process and are well-informed about industry developments.

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EXECUTIVE SUMMARY.

CAP: NZKGI supports a 3-year cap setting utilising a labour supply/demand model.

ALLOCATION: NZKGI is in favour of implementing a 3-year allocation process which is performance based.

COMPLIANCE: NZKGI supports enhancing the inspection regime and establishing more clearly what constitutes a breach of RSE requirements 'other than of a minor nature'. NZKGI also supports a feedback loop for RSE employers, as well as establishing a scale of breaches of RSE requirements including a clear process for complaints and how issues are to be addressed.

ACCOMMODATION: NZKGI supports transparency to provide workers with recent photos and details of accommodation, to introduce a methodology to assess the reasonableness of proposed accommodation costs/cost increases and to regularly collect and collate a wider range of data from RSE employers on their accommodation. In addition, we support clarifying the RSE accommodation standards to provide greater specificity.

DEDUCTIONS: To ensure consistency and transparency, NZKGI supports a standardised template deductions form for Immigration New Zealand (INZ) and the Labour Inspectorate (LI) to provide to employers as well as a standardised template for operational guidance to the LI on assessing expenses. NZKGI also supports specifying in the policy a minimum dollar amount of pay a worker receives in their hand each week as well as clarifying cost-sharing arrangements and giving the worker the option as to how they would like their deductions to be spread across their time on the scheme.

LABOUR MARKET TEST: For greater clarity and consistency, NZKGI supports a standards-based approach. However, NZKGI **opposes a RSE standard of employment** due to inconsistencies between regions, work readiness among potential New Zealand workers and difficulty finding suitable candidates and instead implementing a standardised work plan.

FLEXIBILITY: NZKGI supports a 3-year, multi-entry visa which allows workers to be moved between regions without a new Agreement to Recruit with the same employer. However, NZKGI **opposes visa's not tied to one employer to enable RSE workers to move between RSE employers.**

HEALTH: NZKGI supports RSE workers having access to publicly funded healthcare. We also support mass procuring the best deal for health insurance and that “acceptable” health insurance is defined. Further, we support mandating health insurance information for workers.

PASTORAL CARE: We support clarifying the pastoral care standard which includes requirements for employers to complete pastoral care plans

WORKER RIGHTS AND EXPLOITATION RISKS: NZKGI supports providing guidance to employers clarifying Pacific countries’ expectations and the obligations on the employer. This involves providing guidance to employers clarifying Pacific countries’ expectations and the obligations on the employer, as well as the establishment of a support package for RSE workers and streamlining processes for INZ to transfer workers to another RSE employer in cases of exploitation.

BENEFITS: NZKGI supports requiring employers to provide training and skills development opportunities. NZKGI also supports requiring the pre departure process to facilitate access to workers’ Pacific superannuation schemes. However, NZKGI **opposes requiring an increase in minimum pay rates over time towards the median wage.**

OTHER RECOMMENDATIONS SUPPORTED BY NZKGI:



- The need for more resourcing for the Labour Inspectorates.
- A 30-hour average over a four-week period requirement.
- Providing all communication materials in the language of RSE worker.
- Establishing a more consistent and equitable accreditation process.
- The implementation of an RSE Worker App.
- The provision of basic budgeting and financial literature training for all RSE workers.

NZKGI recognises the significant benefits that the RSE scheme has brought to the New Zealand kiwifruit industry. At the same time, we acknowledge that expectations are changing with regards to the well-being and working conditions of the RSE workers themselves. By addressing these concerns head-on, we can ensure that the scheme continues to operate effectively and sustainably, benefitting all stakeholders involved.

1. RSE SCHEME IN NEW ZEALAND

NZKGI recognises the significant benefits that the RSE scheme has brought to the New Zealand kiwifruit industry. At the same time, we acknowledge that expectations are changing with regards to the well-being and working conditions of the RSE workers themselves. By addressing these concerns head-on, we can ensure that the scheme continues to operate effectively and sustainably, benefitting all stakeholders involved.

Although New Zealanders are the kiwifruit industry's first priority when it comes to picking and packing kiwifruit, the low 'work ready' unemployment rate makes it difficult to fill all the available positions. Other sources of seasonal labour include backpackers and students but there are shortages at important times, particularly around weekend and nightshifts. RSE workers make a key and significant proportion of New Zealand's kiwifruit workforce, estimated to be around 15-25% of the seasonal workforce, depending on the time of the year. The kiwifruit industry is expanding and will be increasing its already significant contribution to regional and the national economy and RSE workers are important to maximising the growth potential of the kiwifruit industry.

THROUGHOUT OUR CONSULTATION PROCESS, A COMMON THEME EMERGED THAT UNDERScores THE NEED FOR THE RSE SCHEME TO HAVE GREATER CLARITY, DEFINED AND CONSISTENT STANDARDS, AND MEASURABLE OUTCOMES. ACHIEVING THIS STANDARDISATION AND TRANSPARENCY IS IMPERATIVE FOR THE SCHEME'S SUCCESS AND TO ENSURE THAT ALL STAKEHOLDERS ARE WORKING TOWARDS THE SAME GOALS.

We have engaged in extensive discussions and working groups with various key stakeholders to ensure that our submission is well-informed and reflective of the views of the industry. We have engaged with Kiwifruit RSE Employers, Pacific Island Government Representatives from six of the nine countries involved in the scheme, Bay of Plenty Ministry of Social Development (MSD) Representatives, Bay of Plenty Labour Inspectorate Representatives, Māori Kiwifruit Growers Inc, a specialist New Zealand Immigration Law Firm, and the NZKGI Executive. Their insights and feedback have helped shape our proposals and recommendations, and we are grateful for their collaboration in this important matter.

We believe that our recommendations and proposals reflect a balanced and equitable approach, which considers the needs of all stakeholders involved. NZKGI appreciates the opportunity to consult on the RSE Scheme Policy Review.


2. THE KIWIFRUIT INDUSTRY IN NEW ZEALAND

Kiwifruit have been grown commercially in New Zealand since the 1930's with exports starting in the 1950's through shipments to the United Kingdom. Originally known as the New Zealand Kiwifruit Marketing Board and coined Zespri in 2000, the single desk exporter was established in the 1980's in response to prices crashing worldwide due to oversupply. Subject to only minor exceptions, today Zespri manages the export and marketing of New Zealand grown kiwifruit to all countries other than Australia.

Kiwifruit is grown in eight regions, however much of New Zealand's kiwifruit (79%) is grown in the Bay of Plenty where the soils are generally deep and free draining.

Māori growers make up around 10 percent of the industry with 87 percent being based in the Bay of Plenty. In 2021, Māori growers produced 15.7 million trays which is approximately \$165 million of income to Māori growers.

The kiwifruit industry is the biggest sector and largest exporter in New Zealand's horticultural industry making up 40% of total export value¹.

										
	KIWIFRUIT	GRAPE WINE	APPLES	AVOCADOS	ONIONS	PEAS	POTATOES	VEGETABLE SEEDS	SQUASH	CHERRIES
2020	\$2,540M	\$1,908M	\$896M	\$122M	\$148M	\$115M	\$127M	\$112M	\$79M	\$51M
2021	\$2,709M	\$1,858M	\$847M	\$211M	\$145M	\$108M	\$100M	\$88M	\$72M	\$55M

Source: Fresh Facts 2021

Kiwifruit has been a remarkable success story for New Zealand, delivering enduring and strong economic returns to the New Zealand economy. With exports worth \$2.87 billion in the financial year 2021/22 and with sales expected to grow to \$4.0 billion by 2027, kiwifruit provides one of the highest per-hectare returns in New Zealand's primary sector – \$75,494 per hectare for Zespri Green (green) and \$176,026 per hectare for Zespri SunGold™ (gold) in 2021/22.

The kiwifruit industry is a major contributor to regional New Zealand returning \$2.417 billion directly to rural communities in 2021/22. This has wide ranging benefits not only in terms of regional employment, but domino effects into rural communities for related services (everything from tractor distributors to farm supplies, cafes and schools).

TABLE ONE: SNAPSHOT OF REGIONAL CONTRIBUTION

REGION	REGIONAL CONTRIBUTION
Auckland	\$92m
Bay of Plenty	\$1.992b
Hawkes Bay	\$39m
Lower North Island	\$5m
Nelson	\$27m
Northland	\$98m
Poverty Bay	\$89m
Waikato	\$75m

Source: Zespri

Not only does kiwifruit significantly contribute to regional and national GDP and provide returns to growers, but the industry also has a low environmental footprint and low carbon emissions (0.6 tonnes of CO₂-e per ha per year^[2]).

Across the industry, there are 2,843 growers, 14,000ha of orchards, 9,350 permanent employees and up to 20,000 jobs during the peak season.

THE TOTAL PERMANENT WORKFORCE CAN BE BROKEN DOWN TO:

- **6,100** permanently employed staff
(4,460 on-orchard and 1,640 post-harvest)
- **1,000** self-employed orchard owners and contracting business owner FTEs working in the business.
- **2,250+** workers in a long-term capacity in the sector, but not on a permanent employment agreement.

This cohort are included in the seasonal worker estimates in this report, and many will be counted in both on-orchard- and post-harvest seasonal figures (working segments of the year in each).

Of the seasonal workforce, 60% are New Zealanders with 38% of these being Māori. The remainder of the seasonal workforce are supported by backpackers and workers from Pacific nations.

Māori growers make up around 10 percent of the industry with 87 percent being based in the Bay of Plenty. In 2021, Māori growers produced 15.7 million trays which is approximately \$165 million of income to Māori growers.

Participation in the RSE scheme is key for Māori organisations to meet the seasonal labour demands of the kiwifruit industry while also prioritising the employment of their own people. Many Māori organisations have successfully shifted towards direct employment of their people by supplementing their permanent local workforce with seasonal RSE workers. This approach not only benefits the organisation but also the entire community by creating more stable and committed jobs.

The kiwifruit industry in New Zealand is actively pursuing innovative solutions to address labour shortages and improve efficiency through the implementation of automation and technology. Investment in ongoing research and development is expected to further propel these trends. However, as the industry transitions towards automation, it remains heavily reliant on the valuable contribution of RSE scheme workers to maintain productivity and sustain growth.

The kiwifruit industry in New Zealand has been experiencing significant growth in recent years, due to increasing year on year global demand for nutritious great-tasting fruit, enhanced by the commitment of growers to quality and sustainability. This growth provides significant opportunity for the industry to continue to expand and create employment opportunities for New Zealanders.

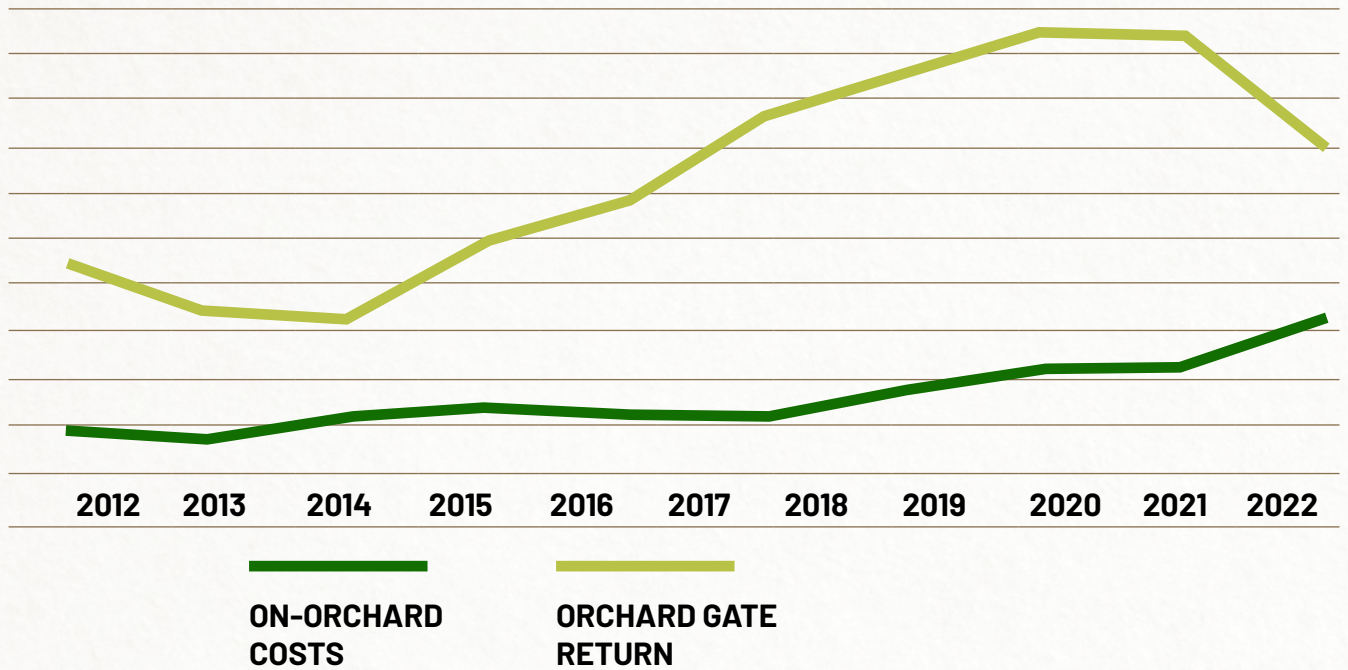
The kiwifruit industry in New Zealand has been experiencing significant growth in recent years, largely due to the long-term plan of Zespri and the commitment of growers to quality and sustainability. This growth provides a valuable opportunity for the industry to continue to expand and create employment opportunities for New Zealanders.

However, growth alone is not enough. Grower profitability needs to be maintained to ensure the sustainability of the industry. The following graph illustrates the Orchard Gate Return and the On-Orchard Costs for kiwifruit growers in New Zealand. It takes into account various factors such as rates and insurance but doesn't include borrowing costs. The graph highlights the increasing financial pressures on employers.

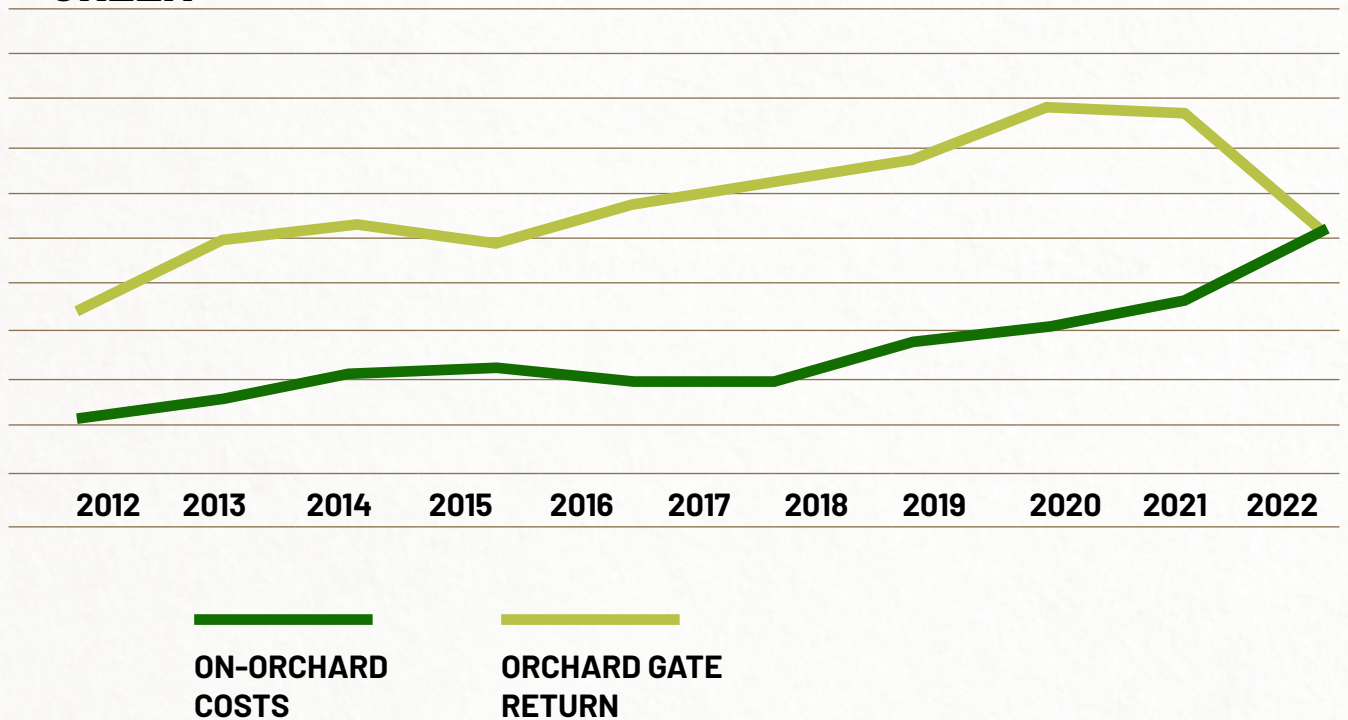
As the graph demonstrates, the relationship between On-Orchard costs and Orchard Gate Return is complex, and kiwifruit growers need to navigate this balance carefully. RSE employers must manage their participation in the RSE scheme to ensure they can continue to provide job opportunities while maintaining a healthy profit margin.

ORCHARD RETURN V COST

GOLD



GREEN



The graph does not account for the borrowing costs that growers may incur when purchasing their orchards. These costs can be significant and, in some cases, may be comparable with On-Orchard costs.

Profitability is essential to invest in automation and other initiatives that can increase the number of high-paying jobs for New Zealanders due to the significant capital investment required. By prioritising profitability and sustainability, the industry can create employment opportunities that benefit workers and their communities. For example, automation technology can help to reduce labour costs and increase efficiency, freeing up resources to invest in higher-skilled and higher-paying jobs for New Zealanders.

Zespri carefully assesses market factors and consumer demand characteristics across its over 50 markets to reliably forecast optimal supply, which helps to inform expansion in terms of both hectares and workforce requirements. Zespri's long-term planning focuses on increasing grower profitability and investing in automation. This centralised approach allows for efficient resource management, market stability, strategic workforce planning, and targeted investments in technology. Ultimately, Zespri's plan aims to create more high-paying job opportunities for New Zealanders and ensure the continued success of the kiwifruit industry.



3. CAP

NZKGI advocates for a bottom-up approach to Cap Setting where the cap reflects the verified aggregate demand from approved employers.

a) **NZKGI supports a 3-year cap setting.**

New Zealand Kiwifruit Growers Inc. (NZKGI) supports the implementation of a three-year multi-year cap on the Recognised Seasonal Employer (RSE) scheme. This measure will provide greater certainty for employers to make capital investments, including in purpose-built worker accommodation, and will support Pacific partners in overseeing demand for their labour force.

The RSE scheme has been instrumental in providing a reliable and efficient source of seasonal workers for New Zealand's horticulture and viticulture industries. However, the uncertainty surrounding the scheme's continuation has hindered employers' ability to make long-term investments, including in worker accommodation, which is essential for ensuring the health and wellbeing of RSE workers.

By implementing a three-year cap, employers will be provided with greater certainty, which will enable them to make long-term investments with confidence. This will not only benefit RSE workers but will also support the continued growth of the horticulture and viticulture industries, which are important to New Zealand's economy.

Additionally, the multi-year cap will support Pacific partners in overseeing the demand for their labour force, which is essential for ensuring that RSE workers are not subject to exploitation or mistreatment. By providing greater oversight, Pacific partners can ensure that RSE workers are being treated fairly and are provided with appropriate working conditions and accommodations.

b) **NZKGI supports utilising a labour supply/demand model.**

NZKGI supports the use of a supply and demand model for determining the Cap application process. This model requires two inputs: the Pacific Countries CAP and Employer Numbers.

1. The Pacific Countries should indicate the maximum number of workers they are willing to provide to New Zealand via the RSE Scheme.
2. RSE Employers need to submit their verified requested number of workers, which should be collated and compared to the Pacific Countries CAP. This comparison should include an allowance for any newly accredited RSE employers.

For employer numbers to be included in an aggregation they first need to be verified by MSD, the Labour Inspectorate and Onshore Pacific Representatives. This is an important step to provide government with confidence that individual employers are adhering to the principals of the scheme.

If the requested number is lower than the available workers from the Pacific Countries, then all requests should be approved and that becomes the new CAP. However, if the requested number is higher than the combined Pacific Countries CAP, then the combined Pacific Countries CAP becomes the CAP in the short term. In this case, alternatives need to be discussed.

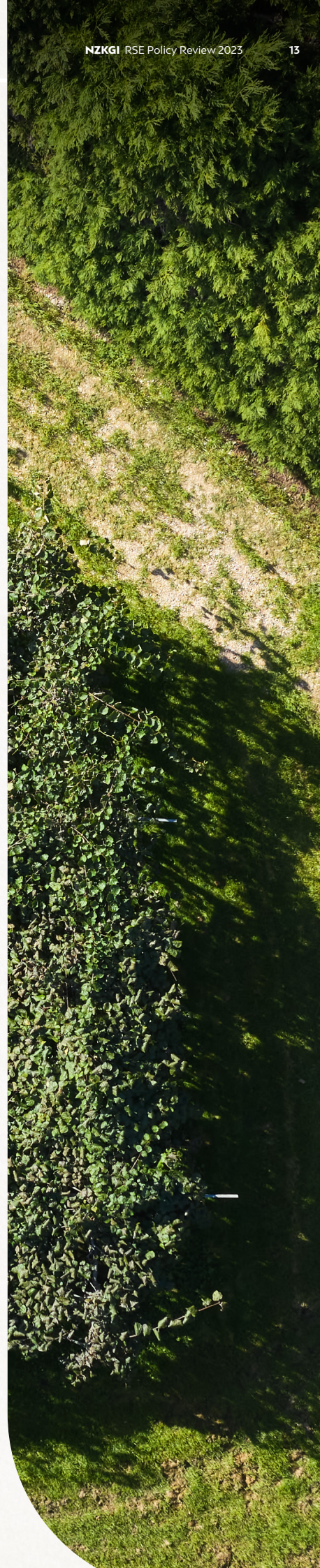
Running the Allocation model in parallel or slightly ahead of the Cap application ensures a smoother process and reduces the risk of labour shortages during the harvest season. By using a data-driven approach, the industry can make informed decisions that benefit both employers and workers.

c) **NZKGI supports each RSE country having the ability to determine its own cap.**

Each individual RSE provider's government should determine its own maximum cap for the RSE scheme every 3 years. This approach would recognise the unique needs and circumstances of each country and enable them to protect their workforces and natural resources while participating in the scheme.

Pacific countries have different levels of economic development, population sizes, and environmental challenges. As such, it is important that they have the autonomy to choose a maximum cap that is appropriate for their situation. For example, a smaller island nation may prefer to have a lower cap to preserve their local labour force and minimize environmental impacts, while a larger country with a larger workforce and natural resources may choose to have a higher cap to meet the demands of the industry.

Allowing Pacific country governments to choose their own maximum cap would also ensure that the RSE scheme is aligned with their national development priorities. By participating in the scheme in a way that meets their own unique needs, Pacific countries can use it as a tool for economic development, job creation, and environmental sustainability.



4. ALLOCATION

a) NZKGI is in favour of implementing a 3-year allocation process.

Implementing a multi-year allocation process for the New Zealand RSE scheme has the potential to yield several benefits. Firstly, it will offer employers who depend on RSE workers greater certainty and stability by informing them in advance of their access to workers for the next three years. Such predictability can allow them to plan their business operations appropriately and consider investments in long-term improvements and infrastructure.

A multi-year allocation process would enhance retention rates and job satisfaction among RSE workers. By providing a more stable and secure work environment, RSE workers will be more inclined to return for subsequent seasons, reducing the need for employers to continuously train new workers.

A multi-year allocation process would also reduce recruitment costs for employers, given that they would not have to repeat the recruitment process annually. This would help make the RSE scheme more cost-effective over the long run.

b) NZKGI is in favour of the allocation process being performance based.

NZKGI advocates for a performance-based allocation process for the RSE scheme that assesses employers on their compliance record, ability to provide suitable accommodation and pastoral care, and their commitment to upskilling and training. This model offers several benefits, including greater certainty and stability for employers who depend on RSE workers, allowing them to plan their business operations appropriately and consider investments in long-term improvements and infrastructure.

Employers would provide a 48-month plan with actual and projected data on producing hectares, permanent and seasonal workforce, and accommodation, with input from the Ministry of Social Development, Labour Inspectorate, and Pacific Island nations. This data would be used to determine whether an employer qualifies for an increase in allocation.

The allocation model proposed also aims to introduce a feedback loop, which is currently absent from the RSE scheme's structure. This feedback loop would provide valuable information to employers on areas where they need to improve and offer support to help them address any issues identified. By providing this feedback and support, employers can work towards making improvements and be better positioned for the next allocation round. This will help to ensure that the RSE scheme continues to evolve and improve over time, meeting the needs of both employers and workers.

By introducing a verified allocation process, employers would have more clarity on what officials are checking, making it easier for them to make improvements and comply with the scheme's requirements. The proposed model also ensures that the allocation of RSE workers is fair and transparent, meeting the industry's workforce needs while adhering to the RSE scheme's overall cap.

Overall, NZKGI supports a performance-based allocation process that offers employers greater stability and certainty while also ensuring that they comply with the scheme's requirements and provide suitable accommodation and pastoral care. The proposed model provides a fair and transparent allocation of RSE workers, ultimately benefiting the industry and the country as a whole.

Please see Appendix 1 - Example of an Allocation Model

5. COMPLIANCE

a) NZKGI supports establishing more clearly what constitutes a breach of RSE requirements 'other than of a minor nature'.

Establishing clear guidelines for what constitutes a breach of RSE requirements 'other than of a minor nature' will have several benefits.

Firstly, it would provide greater clarity for both employers and workers about what is expected of them and what actions could result in a breach of the requirements. This could help to prevent accidental breaches and reduce the likelihood of disputes or disagreements arising.

Clearer guidelines would enable more consistent enforcement of the requirements. This could help to ensure that all employers and workers are held to the same standard and that there is a level playing field for all participants in the RSE scheme.

More clearly defined breaches would help to improve worker welfare and safety. By making it clear what actions or omissions could result in a breach, employers are more likely to take steps to prevent such breaches from occurring in the first place, leading to better working conditions and higher job satisfaction for workers.

b) NZKGI supports establishing a scale of breaches of RSE requirements.

Establishing a scale of breaches of RSE requirements would be a beneficial move in ensuring that compliance frameworks are robust and adequate to protect the interests of workers, employers, and communities. The proposed 'graduated' response to breaches based on factors such as level of harm, intentionality, and severity of breach would enable a more equitable and proportionate approach to sanctions.

By categorising breaches based on these factors, employers and workers would have a clear understanding of the potential consequences of non-compliance, and this would incentivise greater compliance with RSE requirements. Additionally, the geographic or work-unit specific responses for lesser or first breaches would provide a targeted response to breaches and send a signal to all stakeholders that compliance is taken seriously.

Please see Appendix 2 - Example of a RSE Employer Breaches Table

c) NZKGI supports establishing clear process for how complaints and issues are to be addressed.

Establishing a clear process for addressing complaints and issues is essential to ensure that the rights and welfare of both employers and workers are protected under the RSE scheme. By clearly allocating responsibilities for gathering evidence and making decisions on appropriate actions, we can ensure that issues are addressed promptly and fairly.

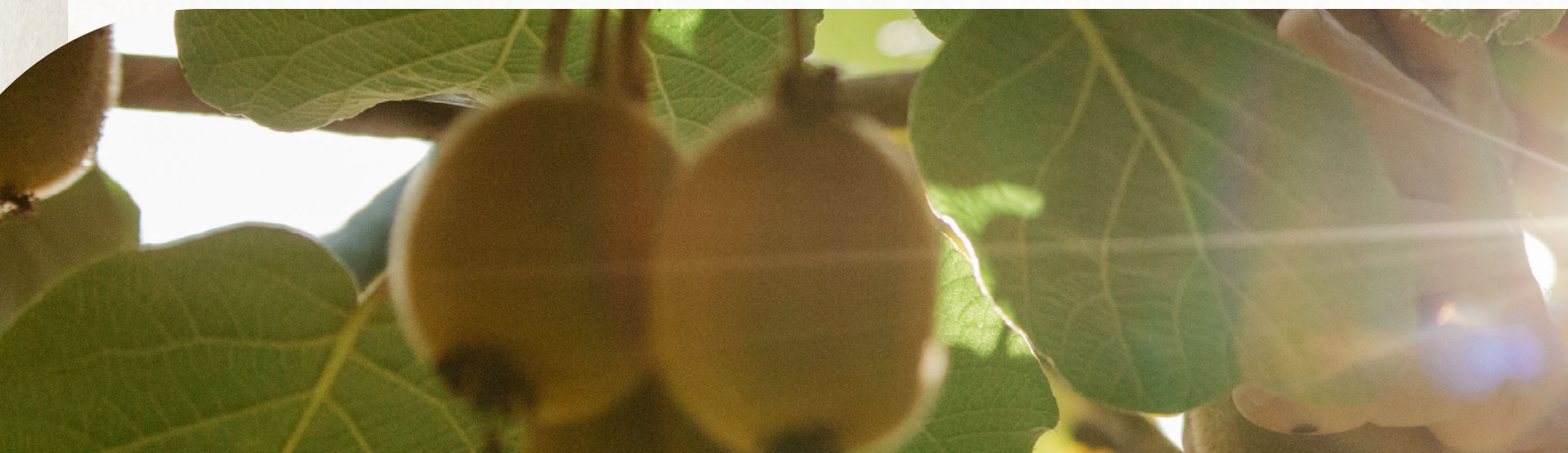
Establishing a transparent process for making judgments concerning the removal or constraints on access to labour can help build trust and confidence in the system. This process should take into account the specific circumstances of each case, with a focus on ensuring that any actions taken are proportionate and appropriate.

d) NZKGI supports increasing RSE worker voice and agency in understanding rights, raising concerns, and getting resolution.

Increasing the voice and agency of RSE workers is a key step towards creating a fair and just work environment. By improving the information and channels available to RSE workers and employers, we can ensure that everyone is aware of their rights and responsibilities under the RSE scheme. This will enable RSE workers to raise concerns and seek resolution, either through their representatives or directly.

The role of the Onshore Pacific Representatives is key in this regard, as they provide valuable support and guidance to RSE workers. They can assist with language barriers, cultural differences, and other issues that may prevent RSE workers from fully understanding their rights and responsibilities. By enhancing the role and resources available to the Onshore Pacific Representatives, we can further improve the voice and agency of RSE workers.

Furthermore, by alerting Immigration New Zealand (INZ) of unresolved concerns, these issues can be taken into consideration in RSE or ATR decisions. This not only supports the rights of RSE workers but also contributes to a more transparent and accountable system. Therefore, NZKGI fully support measures to increase RSE worker voice and agency in understanding their rights and raising concerns.



e) NZKGI supports enhancing the inspection regime.

An enhanced inspection regime for the RSE scheme would provide several benefits. Firstly, increasing resources for inspection activity and providing clarity on what inspections cover, including specific requirements such as pastoral care and accommodation, would improve the overall performance of the sector and contribute to the objectives of the RSE scheme. The consequences of identified breaches would be clearly outlined, providing a strong deterrent against non-compliance. This would help to ensure that employers meet their obligations to their RSE workers, resulting in better working conditions and higher job satisfaction.

Increased training for inspectors would help to ensure that inspections are conducted consistently and to a high standard. This would increase the credibility of the inspection regime and provide greater assurance to both RSE workers and employers.

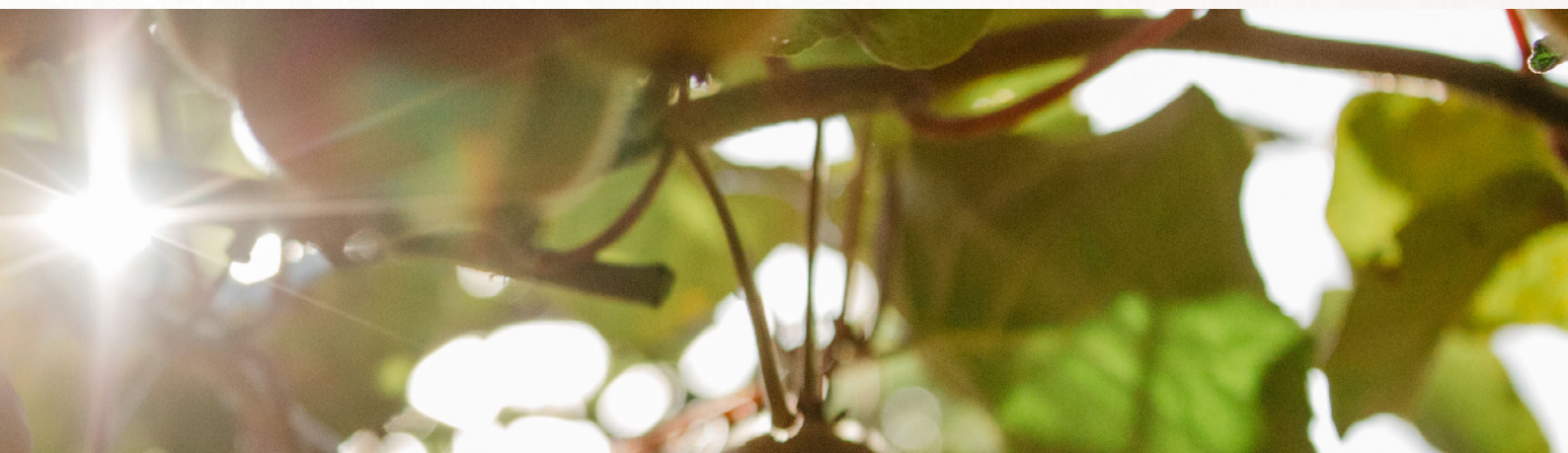
f) NZKGI supports incentives for good performance to be developed with stakeholders.

The proposal to develop incentives for good performance in the RSE scheme is an important step towards improving compliance and promoting ethical employment practices. The development of sector-specific schemes like New Zealand Good Agricultural Practices (NZGAP) and Zespri CAV Programme already demonstrated the benefits of working with stakeholders to establish standards and best practices that support compliance.

By providing incentives for good performance, the proposal would encourage employers to engage with these schemes and improve their compliance with RSE requirements. This, in turn, would help to improve working conditions for RSE workers and reduce the likelihood of breaches occurring.

In addition, streamlining INZ decision-making for employers who are part of these schemes would help to reduce the administrative burden associated with compliance. This would make it easier for employers to participate in the RSE scheme, while also ensuring that compliance is maintained.

Overall, developing incentives for good performance in the RSE scheme would be a positive step towards promoting ethical employment practices, improving compliance, and ensuring that the RSE scheme is accessible and effective for both employers and workers.



6. ACCOMMODATION

a) **NZKGI supports updating the RSE accommodation standards to provide greater specificity.**

Accommodation standards need to strike the right balance between acceptable standards and not overinvesting at the risk of driving up the price of accommodation for workers.

Updating the RSE accommodation standards to provide greater specificity would have several benefits for the RSE scheme. Firstly, the implementation of the Healthy Homes standards would ensure that RSE workers are housed in accommodation that meets a high level of quality and safety. This would help to improve the living conditions of workers and provide greater assurance that their basic needs are being met.

By providing clear guidelines on what is expected of accommodation providers, employers would be able to make more informed decisions when selecting accommodations for their workers.

It is important to provide employers with a reasonable transition period to bring their accommodations in line with any new changes to the RSE scheme standards. While it is essential to ensure that RSE workers are provided with safe and comfortable living conditions, we must also recognise that some employers may require time to make the necessary upgrades to their accommodations. By allowing a fair transition period, we can encourage compliance with the RSE scheme standards while minimising the burden on employers.

b) **NZKGI supports requiring employers to provide workers with recent photos and details of accommodation.**

Requiring employers to provide workers with recent photos and details of their accommodation is a necessary step in ensuring transparency and fairness in the RSE scheme. By providing workers with information about their accommodation prior to their arrival in New Zealand, workers can make informed decisions about their working conditions, including their living arrangements.

This requirement will also help prevent situations where workers are surprised or disappointed upon their arrival in New Zealand and may have concerns about their accommodation that could have been addressed prior to their arrival. By providing clear information about accommodation and setting up a pathway for workers to raise concerns, employers can create a more positive and welcoming environment for their workers.

In addition to improving the experience of RSE workers, this requirement can also benefit employers by promoting better communication and trust between employers and workers. It demonstrates a commitment to transparency and a willingness to engage with workers about their needs and concerns.

In the case of larger employers, it may not always be possible to confirm the final accommodation for RSE workers prior to their arrival in New Zealand. In such instances, the suggested approach has been to provide workers with photos that are representative of the accommodation they will stay in, with a disclaimer that there may be some variation.

As a potential solution for larger employers with multiple properties, we suggest exploring the possibility of providing a sample of a range of photos depicting the expected standard of accommodation, as agreed upon with the Labour Inspectorate.

Requiring employers to provide detailed information about accommodation and establishing a clear pathway for raising concerns can enhance the RSE scheme by promoting fairness, transparency, and communication between employers and workers.

c) NZKGI supports introducing a methodology to assess the reasonableness of proposed accommodation costs/cost increases.

Introducing a methodology to assess the reasonableness of proposed accommodation costs or cost increases would bring much-needed transparency and fairness to the RSE scheme. This would help to ensure that workers are not being exploited by excessive accommodation costs and would provide a safeguard against unscrupulous employers seeking to maximize their profits at the expense of their workers. By implementing this methodology, we can ensure that the costs being charged for accommodation are reasonable and reflect the actual costs of providing suitable accommodation for RSE workers. This will promote a more positive and sustainable relationship between employers and workers, which is essential for the long-term success of the RSE scheme.

d) NZKGI supports starting to regularly collect and collate a wider range of data from RSE employers on their accommodation.

Introducing a regular and comprehensive data collection system from RSE employers on their accommodation would greatly enhance the monitoring of accommodation supply and demand. This would allow for informed decision-making in regards to improvements to accommodation standards, which would ultimately benefit RSE workers and employers alike. By collating and analysing data on complaints and regularly surveying workers on their satisfaction with accommodation, it will be possible to identify areas of concern and improve the overall quality of RSE accommodation. This will help to ensure that RSE workers are provided with safe and comfortable living conditions, which is not only a moral obligation but also a legal requirement. Additionally, by enhancing the monitoring of accommodation supply and demand, it will be possible to identify any issues early on and work with employers to address them before they become significant problems.

An efficient approach would be if the Labour Inspectorate, who are responsible for reviewing all accommodation, were also responsible for collating information about existing accommodation.

Overall, the regular collection and collation of data on RSE accommodation will be a valuable tool in improving the RSE scheme for everyone involved.

7. DEDUCTIONS

- a) **NZKGI supports a standardised template deductions form for INZ and the LI to provide to employers, to ensure consistency and transparency.**

The introduction of a standardised template deductions form for INZ and the LI to provide to employers would bring about several benefits. Firstly, it would ensure consistency and transparency in the deductions process, making it easier for employers to understand the requirements and comply with them. The form would provide clear guidelines for employers to follow when making deductions from workers' wages, ensuring that they are only deducting amounts that are allowable under the law and/or policy.

Additionally, this standardised template would be especially helpful for workers who move between employers in joint agreements, as it would provide them with a clear understanding of deductions and amounts between employers.

This standardised template would be especially helpful for workers who move between employers in joint agreements, as it would provide them with a clear understanding of deductions and amounts between employers.

To ensure greater clarity and accuracy when discussing the practice of deducting expenses from a worker's pay, it is important to revisit the terminology used. The term "rent deduction" is not always fully representative of the expenses that are being covered and can be misleading.



It is proposed that a more accurate term, such as “partial board”, be used instead. This term better reflects the nature of the expenses being covered, such as power, internet, property maintenance, cleaning, and in some cases, food. By using this more accurate terminology, workers and employers can have a clear understanding of the arrangement and avoid any confusion.

Adopting this more accurate terminology will promote greater accountability and responsibility on the part of employers. It will ensure that they are providing suitable living conditions and that the expenses being covered are reasonable and necessary. This will create a more fair and equitable working environment for workers.

Furthermore, employers need to provide clear details and costs associated with partial board deductions. If partial board includes power, internet, property maintenance, and cleaning services, employers must provide evidence of the breakdown of these costs to the Labour Inspectorate for approval. This helps ensure full transparency and that employers are charging RSE workers fairly.

Providing clear and upfront information to RSE workers about expenses and deductions is key. It enables workers to make informed decisions about their employment and living situation. However, it is important to acknowledge that not all employers may be able to provide accommodation that meets the personal needs of every worker. This highlights the need for open communication between employers and workers to ensure that suitable living arrangements are made.

Moreover, the worker-focused options for consultation demonstrate that employment in the RSE scheme extends beyond the employment agreement and relevant terms and conditions. It includes considerations such as accommodation, transportation, and access to healthcare. Therefore, it is important for employers to approach employment in the scheme holistically and prioritise the well-being of their workers.

Please see Appendix 3 - Example of a Deductions Guideline to be used by the Labour Inspectorate

b) NZKGI supports allowing the worker to have the option as to how they would like their deductions to be spread across their time on the scheme. With a minimum timeframe.

The proposal to allow RSE workers the option to choose how they would like their deductions to be spread across their time on the scheme, with a minimum time frame of 12 weeks, has several potential benefits.

Firstly, it would provide greater flexibility and control for the workers over their finances, allowing them to better plan and manage their expenses. Rather than having a large portion of their wages deducted all at once, they could choose to have smaller deductions spread out over a longer period of time, which may be more manageable for them.

Secondly, it could help to address issues around debt and financial vulnerability that some RSE workers may experience. If workers are able to spread out their deductions, they may be less likely to find themselves in situations where they are struggling to meet their living expenses or are forced to take on additional debt to cover unexpected costs.

Finally, offering this option to workers could help to improve their overall experience on the RSE scheme and enhance their satisfaction with their working conditions in New Zealand. By giving workers more choice and control over their finances, they will feel more valued and respected by their employers and the New Zealand government. This could in turn contribute to greater retention rates for RSE workers and a more positive reputation for the scheme both locally and internationally.

Taking into consideration the potential impact on the cash flow of RSE employers, it is important to note the one-off costs they may incur. For instance, a Kiwifruit RSE employer has provided an example where they incurred a one-off cost of approximately \$1,500 per worker. To lessen the burden on RSE workers, this cost was split into deductions over a 20-week period, which amounts to approximately \$320,000 that the employer has had to bankroll. The one-off cost included a 50% share of the flight to NZ, visa, 50% share of bus transfer from Auckland Airport to Tauranga, and a \$200 cash advance on arrival.

c) NZKGI supports specifying in the policy a minimum dollar amount of pay a worker receives in their hand each week.

The current proposal of using a maximum percentage of a worker's wage as a guide for their minimum take-home pay can lead to confusion and inconsistency. This approach can also result in some workers receiving significantly less pay than they are able to survive on, especially during weeks with lower earnings.

By specifying a minimum dollar amount of pay, the RSE scheme can ensure that all workers receive a fair and consistent wage that meets their basic needs. This measure will also provide clarity for employers, helping them to avoid any unintentional underpayment of their workers.

In addition to promoting fair pay, the establishment of a minimum dollar amount can also serve as a valuable tool for monitoring compliance with RSE scheme regulations. The clear guidelines will make it easier to identify any potential breaches and take appropriate action.

Furthermore, the proposed policy can take into account situations where workers are unable to work due to illness or injury. While sick leave entitlements can provide some compensation, they may not cover all expenses. Offering alternative work opportunities within the same company or on a different work site can help to ensure that workers are fairly compensated during their recovery period.

Overall, establishing a minimum dollar amount of pay for RSE workers is a key step in promoting fair compensation and ensuring compliance with the RSE scheme regulations.

d) NZKGI supports clarifying cost-sharing arrangements in the RSE policy.

Ensuring that there is clear policy on cost-sharing arrangements is essential for both employers and workers in the RSE scheme.

In terms of the specific cost-sharing arrangement proposed, it is beneficial to have the worker cover the Pacific domestic travel, as it is typically more cost-effective for them to arrange this travel on their own. On the other hand, it makes sense for the employer to cover the domestic NZ travel, as they have more knowledge and resources in the country to make the necessary arrangements.

In terms of the international flight, it is reasonable for both the employer and worker to contribute equally to the cost, as both parties benefit from the worker's participation in the RSE scheme. This cost-sharing arrangement can also help to ensure that workers are not put under undue financial pressure to participate in the scheme, as they can split the cost of the flight with their employer.

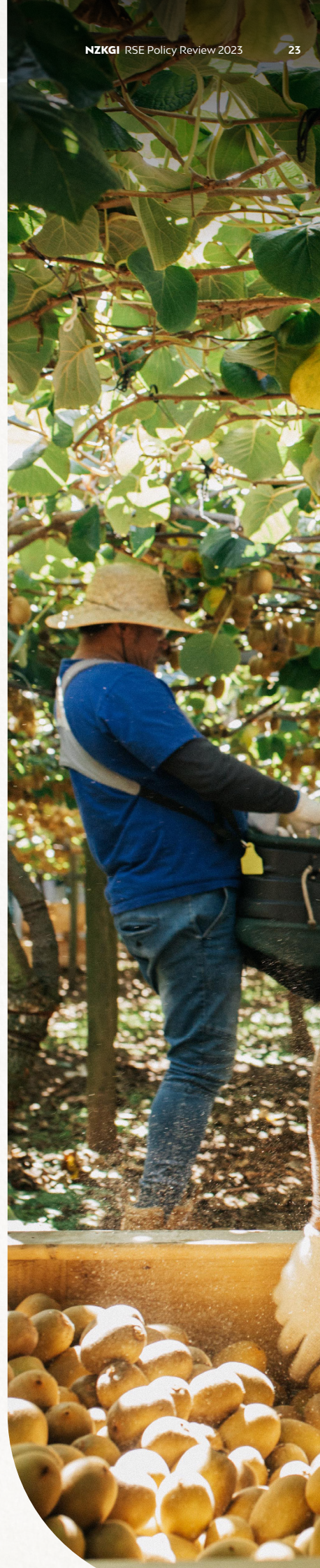
Overall, clarifying cost-sharing arrangements in policy is a win-win situation for both employers and workers in the RSE scheme.

e) NZKGI supports a standardised template for operational guidance to the LI on assessing expenses.

Providing a standardised template for operational guidance to the LI on assessing expenses would bring a multitude of benefits. It would allow for consistency and transparency in the process of assessing expenses and would ensure that all LI staff are following the same procedures.

A standardised template for assessing expenses, including clear criteria for allowable expenses and required documentation, would provide a framework to prevent misunderstandings or discrepancies between employers and workers when claiming expenses. This would not only ensure consistency and clarity for individual workers, but also for those who move between employers under joint agreements.

Having a standardised template for operational guidance would improve the overall efficiency of the process, as it would reduce the time and resources required for the LI to assess expenses. This, in turn, would lead to a quicker resolution for both employers and workers.



8. LABOUR MARKET TEST

a) NZKGI supports a standards-based approach.

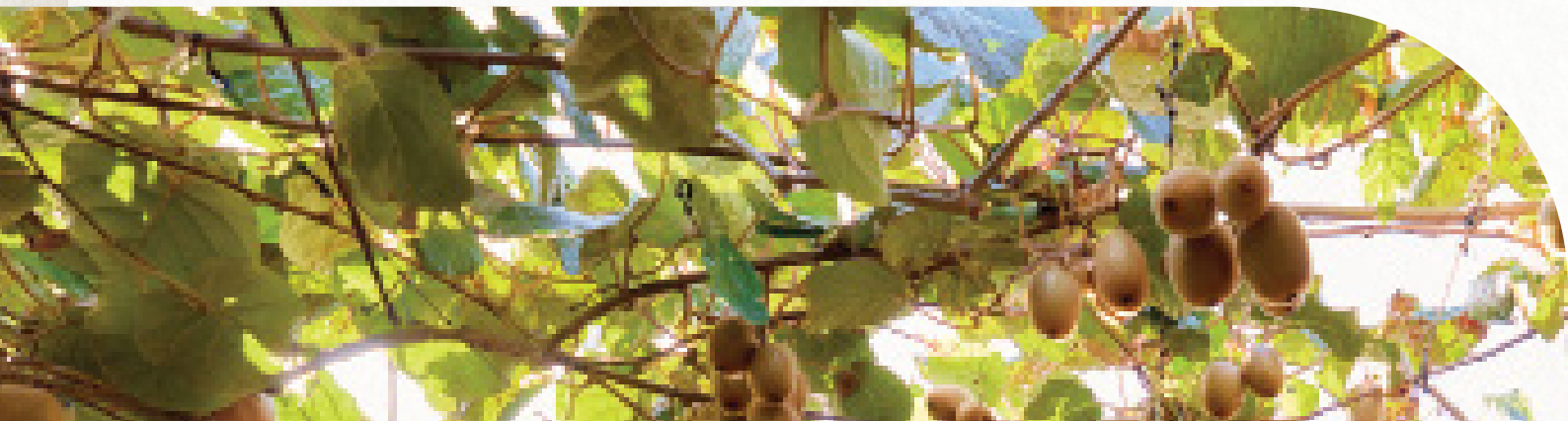
A standards-based approach to the RSE scheme has numerous benefits. By implementing a national standard for all employers, the expectations and obligations placed on them would be clearer and easier to follow. This would provide a more consistent and uniform approach to the RSE scheme, making it easier to assess compliance across the board. Additionally, a national standard could also be adapted to include specific regional standards that are reflective of different labour markets.

Furthermore, if regionally based standards were adopted, it would require good communication between industry and the relevant authorities to ensure everyone is aware of the new standards and how they should be implemented. However, this would provide an opportunity for MBIE and MSD to align their views prior to an upcoming season and work together to ensure the standards are being met consistently across different regions.

A standards-based approach would provide clarity and consistency for both employers and workers. By adopting a national standard with the possibility to include regional standards, the scheme can account for different labour markets while maintaining a consistent compliance approach. Additionally, by providing upfront standards, employers would know what to include in their applications, streamlining the administrative process for both employers and departments that review the information for approval.

The Bay of Plenty Region provides a successful example of a Labour Market Test in action. Under this system, RSE employers submit an Annual Labour Plan to the Ministry of Social Development (MSD) detailing their workforce requirements for upcoming seasons. This ensures accountability and responsibility lies with the employer, who must provide a detailed month-by-month snapshot of their needs using the National Template. By engaging in a partnership with MSD, employers can identify issues, highlight solutions, and have open and frank discussions about labour needs well in advance.

The partnership is more than just ticking boxes for vacancies - it involves actively engaging in a robust conversation about labour needs. Employers must also meet with MSD to discuss the content of their Annual Labour Plan, and MSD may visit sites to assess their capability to fulfil the requirements. The process is designed to be transparent and equitable, with discussions about the number of requests and an Assessment to Recruit (ATR) that matches the Annual Labour Plan.



The recommendation then goes to the Labour Market Manager for approval, with accountability for the New Zealanders first approach. Although hiring New Zealanders can pose challenges that RSE workers don't contend with, such as children's sickness, and other personal commitments, an attitude shift among employers can help overcome these obstacles.

The Seasonal Worker System provides an overview of intentions, including bespoke options for those who are work-ready or not suited to the kiwifruit industry. The level of trust and engagement between the kiwifruit industry and MSD has built relationships based on open and constructive dialogue. It is key to understand the issues before implementing any adaptations or changes, which is why the Labour Market Test has proven to be successful in ensuring that employers make genuine attempts to attract and recruit New Zealand citizens or residence class visa holders before offering positions to overseas job seekers. By prioritising New Zealanders first, we can ensure a fair and equitable labour market for all.

MSD Southern, Northern and Nelson/Tasman regions have recently adopted this method and it has proven to be a great success.

b) NZKGI opposes a RSE standard of employment.

Opposing the proposal of requiring employers to advertise roles for New Zealanders with identical pay and conditions to those offered for RSE workers as a way to satisfy the Labour Market Test (LMT) has several concerns. While the proposal aims to address the issue of employers preferring RSE workers over New Zealanders, it may not necessarily result in the desired outcome.

One issue is the inconsistency between regions. Certain regions may have a higher demand for RSE workers due to the nature of the work, and the proposal may not be effective in addressing the labour shortage in those regions. Additionally, proving that employers are trying to recruit New Zealanders may be challenging, especially if there are no suitable candidates available.

Another concern raised by growers is the work readiness of potential New Zealand workers. The difficulty of finding suitable candidates is attributed to issues such as drug and alcohol use, as well as violence. Other barriers to work include transportation, driver's licenses, social settings, and home environments. While MSD assistance is available to employers, it is not always sufficient, and it is not fair to burden social services resources in an already under-resourced industry.

Implementing a standardised work plan, such as the BOP model as mentioned above, at a national level may provide consistency and improve the working relationship between employers and workers. However, the proposal to require employers to advertise roles for New Zealanders with identical pay and conditions to those offered for RSE workers may not be the most effective solution to address the labour shortage issue.

9. FLEXIBILITY

a) NZKGI supports a multi-entry visa.

Enabling RSE workers to have multi-entry visas is a change that would provide significant benefits for both workers and employers participating in the scheme. The current single-entry restriction on RSE limited visas hinders workers from returning home to attend to personal and familial needs such as family emergencies, funerals/tangi, or other significant events. This not only negatively impacts the workers' well-being but also has the potential to impact their productivity and job satisfaction.

By allowing multi-entry visas, RSE workers would be able to return home for short periods without having to incur the hassle and financial burden of reapplying for a visa and covering associated costs.

Moreover, multi-entry visas would not require any significant structural changes to the administrative system settings. It would be reasonably straightforward to implement, and guidance for employers and workers could be provided on the number of entries and/or allowable reasons for leaving and re-entering. While the cost of return flights for RSE workers at the beginning and end of their visa is shared equally between the worker and employer, returns for family reasons within the visa period should fall on the worker.

b) NZKGI supports a 3-year multi-year visa.

The current single-season restriction of the RSE visa in New Zealand has presented several challenges for both RSE workers and employers. The limitations of this system do not provide workers with the assurance that they can participate in the scheme for longer than one season, nor do they provide employers with certainty in their medium-term workforce planning. It is clear that a change is necessary to address these issues.

RSE employers and workers have expressed interest in a multi-year visa that would be applicable for several consecutive seasons. To address this, we suggest introducing a three-year visa, covering three separate periods of either 7 or 9 months each. This not a full-time three-year visa.

By implementing this solution, all parties involved would experience increased certainty, allowing for more effective forward planning and a reduction in visa and administrative expenses. Furthermore, a multi-year visa would grant RSE workers the chance to develop their skills and enhance their employability, benefiting both the workers and their employers. This proposal also encourages employers to maintain exceptional working and accommodation conditions to retain RSE workers for successive seasons.

Implementing a multi-year visa for RSE workers presents several important issues that must be addressed. However, these issues are not insurmountable, and they can be resolved through careful planning and collaboration between relevant stakeholders.

A multi-year visa must be linked to a multi-year cap setting process to ensure its workability. By monitoring and evaluating the program regularly and consulting with stakeholders, it is possible to establish a cap setting process that is responsive to changing needs and conditions.

c) NZKGI supports allowing workers to be moved between regions without a new Agreement to Recruit with the same employer.

NZKGI are in support of allowing RSE workers to be moved between regions under the same Agreement to Recruit (ATR) because it would provide greater efficiency and flexibility for the RSE scheme. This approach would not only reduce administrative burdens for employers and INZ, but it would also provide more transparency and clarity for all parties involved and ultimately improve the experience for workers.

Currently, if a worker needs to be relocated to a different region, a new ATR must be submitted and approved by INZ, which can be time-consuming and bureaucratic. Allowing workers to be moved between regions under the same ATR would save time and effort while also providing a more efficient use of resources.

Allowing workers to be moved between regions under the same ATR would address these challenges by providing greater flexibility for employers and workers. Employers would be able to better manage their workforce across different regions limiting the need for additional paperwork and delays. Workers, on the other hand, would have the opportunity to gain experience in different regions and be more able to respond to the needs of their employers. The proposed change would not compromise the safety and wellbeing of workers. Employers would still need to provide the same level of accommodation, transport, and other support services required by the current system. The initial ATR would also need to include any potential changes of location, which would provide transparency and clarity for both employers and workers. Employers would need to inform the RSE unit of the RSE's movements, and most importantly, any change in the accommodation and other arrangements for the workers.

d) NZKGI opposes visas not tied to one employer to enable RSE workers to move between RSE employers, except in the instance where there is evidence of exploitation or other issues affecting the worker's wellbeing.

Opposition to allowing RSE workers to move between employers without their visa being tied to one employer is grounded in the need to protect vulnerable workers. The current policy ensures that RSE workers are employed by accredited, reputable employers who have demonstrated their ability to provide safe and fair working conditions for their employees. Allowing RSE workers to move between employers may put them at risk of exploitation by unscrupulous employers who do not prioritize their welfare.

RSE workers often come from countries outside of New Zealand and diverse cultural and linguistic backgrounds. This may put them at a disadvantage and increase their vulnerability to mistreatment. However, by linking their visa to a reputable employer, we can assure that RSE workers are safeguarded from exploitation and provided with equitable working conditions.

Limiting RSE workers to a single employer creates an incentive for the employer to offer favourable working conditions to retain their employees. This encourages employers to prioritise the well-being and safety of their workers, leading to a more positive and productive work environment for both parties. Furthermore, employers have invested in recruiting RSE workers to come to New Zealand and allowing them to transfer to another employer puts that investment at risk.

While it may seem reasonable to allow RSE workers to move between employers, it is important to recognise the risks that such a policy would pose to these vulnerable workers. The current system has been designed to protect them, and any changes to this system should be made with great care and consideration.

It is also important to provide flexibility in the event that a worker is facing mistreatment or abuse from their employer. In such cases, RSE workers should have the ability to move between employers without jeopardising their visa status. This would allow workers to escape abusive situations and seek better working conditions without fear of repercussions. NZKGI recognises the need for flexibility in the RSE scheme to protect workers from mistreatment while maintaining the integrity of the visa system. NZKGI advocates for a system that balances the need for protection with the ability to provide workers with the freedom to seek better working conditions when necessary.

10. HEALTH

a) **NZKGI supports RSE workers having access to publicly funded healthcare.**

The current system, where RSE workers are only entitled to limited healthcare services, is unfair and poses a risk of communicable diseases spreading within the community. Denying healthcare to RSE workers due to financial reasons, such as the cost of accessing healthcare services, may result in a worker's condition deteriorating, and this can be as simple as an untreated boil or dental problem which manifests itself into something more serious when left untreated. RSE workers should have access to quality healthcare services for their well-being and for the safety of the wider community.

By slightly increasing the workers tax rate, it would be possible to fund this much-needed healthcare coverage. The small increase in the tax rate would be a small price to pay for the benefits that this policy would bring, including healthier RSE workers, less spread of disease, and a more sustainable and successful RSE scheme in the long term.

While providing publicly funded healthcare to RSE workers can be beneficial to their health and wellbeing, it is important to acknowledge the potential strain it can put on the healthcare system. The increased demand for healthcare services from RSE workers may lead to longer wait times and delays for other patients, which could ultimately impact the quality of care for everyone. To address this concern, a solution could be to incorporate the role of Pastoral Carers in the healthcare system. With their responsibility over the physical and mental wellbeing of workers, they can play a role in triaging and influencing the healthcare needs of workers, potentially reducing strain on the healthcare system.

Policies and procedures should also be implemented to ensure that RSE workers are using healthcare services appropriately and efficiently. This can be achieved through providing pre-departure training in the workers' native language, which includes information about the New Zealand healthcare system and how to access appropriate services. This training can help workers understand the importance of only seeking healthcare services when necessary, and how to access appropriate care to prevent unnecessary visits to emergency departments.

Another solution is for the New Zealand Government to partner with healthcare providers to ensure that RSE workers are directed to appropriate services and that there are no delays or unnecessary costs. Healthcare providers can work with employers to establish clear protocols for accessing healthcare services and provide guidance on which services are covered by their insurance. This can help to streamline the process and ensure that workers receive appropriate care in a timely and cost-effective manner.

Healthcare providers should also establish culturally sensitive healthcare services to cater to the unique needs of RSE workers. This can include providing interpretation services or partnering with community organisations to ensure that workers feel comfortable and understood when seeking healthcare services.

In conclusion, ensuring RSE workers have access to publicly funded healthcare is not only a matter of ethical responsibility but also a practical necessity for the success of the RSE scheme. However, there is a potential concern that this policy may attract individuals who are seeking free healthcare rather than genuine employment opportunities. To address this, it may be necessary to implement measures to discourage or prevent individuals from taking advantage of the healthcare system without contributing to the productivity of their employers. This could involve closer scrutiny of the eligibility criteria for RSE workers and ensuring that individuals are not abusing the system. Ultimately, the benefits of providing healthcare to RSE workers would outweigh the risks, as it would contribute to a healthier and more productive workforce, benefiting both the workers and the wider New Zealand community.

b) NZKGI supports defining “acceptable” health insurance in policy according to a higher standard as a second alternative to publicly funded healthcare.

It is important to define “acceptable” health insurance in policy according to a higher standard, even if it comes with higher cost implications.

The inclusion of pre-existing conditions, immunisations, screening, contraception, testing and treatment for sexually transmitted infections, and maternity care are necessary to provide comprehensive coverage for RSE workers. These are important areas that should not be overlooked.

c) In the alternative, NZKGI supports mass procuring the best deal for health insurance.

Ensuring that RSE workers have access to acceptable health insurance will protect their health and wellbeing while they are in New Zealand. One way to achieve this is by mass-procuring the best deal for health insurance, either through MBIE or with individual Pacific countries.

The government’s buying power could be utilised to obtain a more favourable deal for RSE workers, ensuring they have access to high-quality healthcare at an affordable cost. This approach would also alleviate the administrative burden on employers who are currently responsible for sourcing and purchasing health insurance for their workers individually. A standardised health insurance policy would provide consistency for workers who move between employers on joint agreements or work for different employers at different times, ensuring they receive the

same level of coverage. Additionally, it can be challenging for employers to determine the appropriate level of coverage for their diverse workforce and individual circumstances.

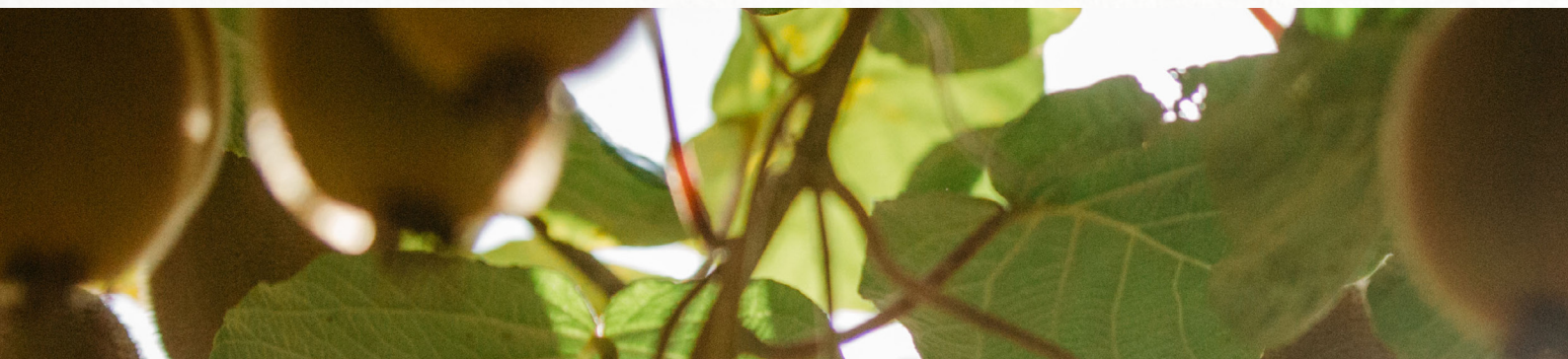
Overall, mass-procuring the best deal for health insurance is a practical and cost-effective solution that would provide RSE workers with the necessary health coverage, while also benefiting employers and the government. If the RSE worker is eligible for public funded medical care, then the cost of insurance would most likely reduce in cost. This would hopefully offset any increase to the tax rate.

d) NZKGI supports mandating public health care / health insurance information.

NZKGI supports mandating health insurance information for RSE workers as part of pre-departure training and employer induction upon arrival. RSE workers are often from countries with different healthcare systems and may not be familiar with the New Zealand healthcare system. By providing comprehensive information about their insurance coverage and how to access it before they arrive in New Zealand, workers will be better equipped to address any health issues that arise during their employment.

Furthermore, providing pre-departure training in the workers' native language can help to alleviate the stress and uncertainty that workers may feel about their healthcare coverage while working abroad. They can arrive in New Zealand feeling more confident and secure in the knowledge that they have access to the healthcare services they need.

In addition, having a standardized medical insurance policy simplifies the pre-departure training process, as there is only one type of policy to explain and translate. This can reduce confusion and ensure that all workers receive the same level of information and preparation, regardless of their country of origin or language proficiency. It can also make it easier for employers to understand and comply with their legal obligations to provide appropriate healthcare coverage for their RSE workers.



11. PASTORAL CARE

a) NZKGI supports clarifying the pastoral care standard.

Ensuring the health and well-being of RSE workers is of utmost importance, and further clarifying the pastoral care standard can go a long way in achieving this goal. By providing further requirements and guidance, we can ensure that RSE employers are equipped to meet the unique needs of their workers, including their physical, social, cultural, spiritual, and mental needs.

It is important to clearly define what pastoral care means and how it can be measured to ensure that it is not just limited to physical health needs, but also encompasses mental health, cultural sensitivity, and overall well-being. This can include providing access to mental health services, cultural support, and other resources that are specific to the workers' needs. Requiring employers to complete pastoral care plans demonstrating how they will meet each of the pastoral care requirements can help ensure that workers receive the care they need. These plans can be tailored to meet the individual needs of each worker and should be reviewed regularly to ensure they remain relevant.

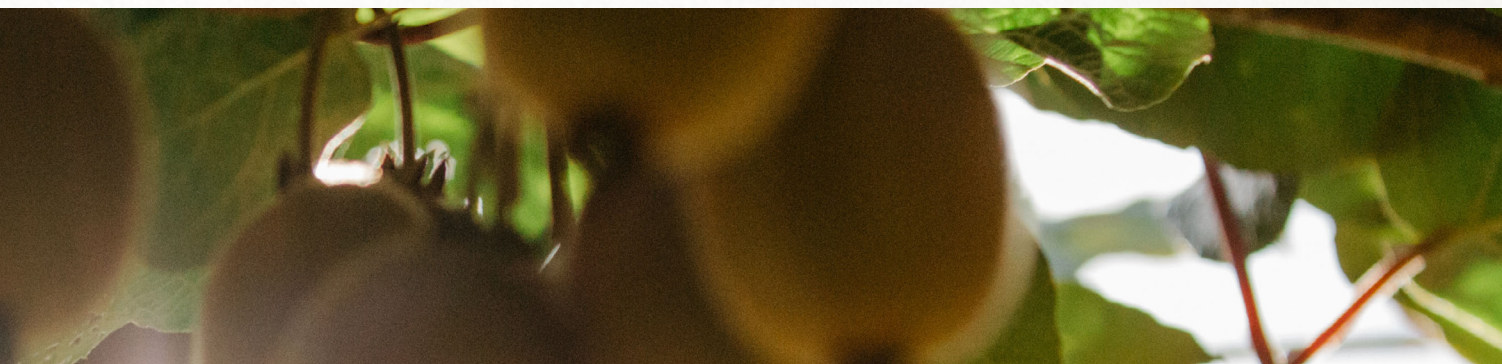
By lifting and clarifying the pastoral care standard and providing further requirements and guidance, we can ensure that RSE workers are receiving the care they need and deserve. This will not only benefit the workers themselves, but also the employers and the wider community.

e) NZKGI supports requiring employers to complete pastoral care plans.

Requiring employers to complete pastoral care plans will ensure that the needs of RSE workers are met and their well-being is protected. Pastoral care plans provide a framework for employers to demonstrate their commitment to the welfare of their workers, and to show how they will meet each of the pastoral care requirements.

This is particularly important for workers who move between employers on joint agreements or between seasons. By establishing clear pastoral care requirements, all workers will receive the same level of support, regardless of who their employer is, and can feel confident that their well-being is a priority.

It is important to recognise that a "one size fits all" approach to pastoral care plans for RSE workers may not be the most effective solution. The level of pastoral care required can vary



greatly depending on the individual worker and their circumstances. However, there are certain basic standards that all RSE employers should be required to meet in order to ensure the well-being and safety of their workers. This includes areas such as health and safety, access to medical care, and support for mental health and well-being. In addition to these basic standards, employers can also consider additional measures that may be specific to their workforce. Many RSE employers have long-standing RSE workers who require less pastoral care, while other employer may have newer workers who require more support. It will be beneficial for employers to assess the individual needs of their workers and develop tailored pastoral care plans accordingly. A long-standing RSE worker may have a simpler pastoral care plan compared to a new RSE worker, but both plans must adhere to the basic standard framework. While bespoke plans may be necessary to address the unique needs of individual workers, they should still meet the minimum requirements of the standard framework.

The Labour Inspectorate should review pastoral care plans to ensure that they are comprehensive and meet the required standards.

c) NZKGI supports requirements for pastoral care workers.

The industry has acknowledged the need for further support in navigating pastoral care obligations, and a dedicated support mechanism could be established through a government agency such as INZ, MPP, or MPI, or through an industry body or non-governmental organisation with expertise in pastoral care.

Such a mechanism would provide employers with a clear point of contact to seek guidance and advice on their pastoral care obligations. It could also offer resources and training on how to meet the various needs of RSE workers, as well as help employers develop and implement pastoral care plans. This would not only improve the quality of care provided to RSE workers but also promote compliance with pastoral care standards and reduce the risk of exploitation.

However, it is important to carefully consider what should be required of employers at a policy level to ensure that they are not being burdened with unnecessary obligations that may not be needed in every circumstance. Adequate resourcing and training must also be provided to ensure that the dedicated support mechanism can effectively carry out its role. Overall, the establishment of a dedicated advice and support mechanism for RSE employers is an important step towards improving pastoral care standards and ensuring the well-being of RSE workers in New Zealand.

b) NZKGI supports establishing a dedicated advice and support mechanism for RSE employers.

Establishing a dedicated advice and support mechanism for RSE employers is key in ensuring they have the necessary resources and guidance to meet their pastoral care obligations towards RSE workers. The industry has acknowledged the need for further support in navigating these obligations, and a dedicated support mechanism could be established through a government agency such as INZ, MPP, or MPI, or through an industry body or non-governmental organization with expertise in pastoral care.

Such a mechanism would provide employers with a clear point of contact to seek guidance and advice on their pastoral care obligations. It could also offer resources and training on how to

meet the various needs of RSE workers, as well as help employers develop and implement pastoral care plans. This would not only improve the quality of care provided to RSE workers but also promote compliance with pastoral care standards and reduce the risk of exploitation.

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12. WORKER RIGHTS AND EXPLOITATION RISKS

a) **NZKGI supports providing guidance to employers clarifying Pacific countries' expectations and the obligations on the employer.**

By providing this guidance, employers can better understand their responsibilities. This guidance should clearly outline the expectations of Pacific countries in regards to worker rights. It should also clarify the obligations that employers have under New Zealand law to provide safe and fair working conditions, adequate remuneration, and proper accommodation.

By providing such guidance, employers can ensure that they are meeting their legal and ethical obligations towards RSE workers, while also maintaining good relationships with Pacific countries. Furthermore, clear and consistent guidance can help to reduce the risk of misunderstandings or disputes arising between employers and workers.

Guidance should be regularly reviewed and updated to reflect changes in legislation and the evolving needs of RSE workers. This will require close collaboration between Pacific, government agencies, industry bodies, and other stakeholders to ensure that the guidance remains relevant and effective.



b) NZKGI supports a streamlined processes for INZ to transfer workers to another RSE employer in cases of exploitation.

The exploitation of RSE workers is a concern. One approach that has been recommended is the establishment of streamlined processes for Immigration New Zealand (INZ) to transfer workers to another RSE employer in cases of exploitation or if their employer loses their accreditation.

This process could be executed by developing clear criteria for when a transfer should occur and establishing a dedicated team within INZ to manage the process. The criteria could include factors such as evidence of exploitation, ongoing concerns about working conditions or pastoral care, or the closure of an employer's business. The dedicated team would be responsible for managing the transfer process, including identifying suitable employers, communicating with workers and employers, and facilitating the transfer of workers.

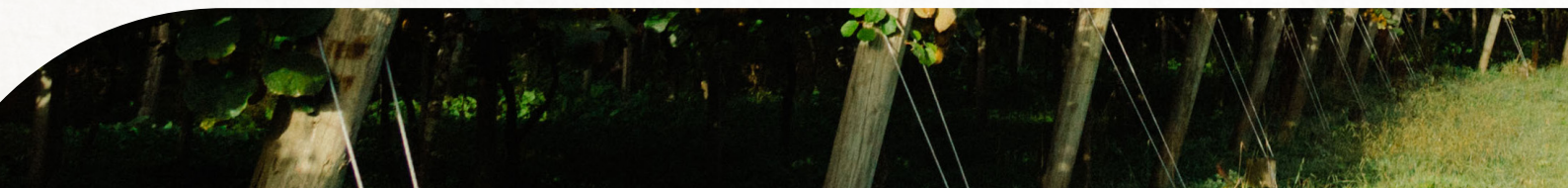
c) NZKGI advocates for raising awareness and strengthening existing communication channels to enhance RSE workers' voice and agency in comprehending their rights, voicing concerns, and resolving issues.

NZKGI supports the promotion and reinforcement of existing communication channels to empower RSE workers, helping them better understand their rights, express concerns, and find solutions to any issues they may encounter during their employment.

Raising awareness of communication channels, such as pre-departure briefings and continuous access to information, will ensure RSE workers are well-informed about their rights and responsibilities. Pre-departure briefings serve as an essential platform for workers to learn about their employment terms, workplace expectations, and legal protections. These briefings should be delivered in the workers' native language to guarantee clear understanding and equal access to information for all participants.

Continuous access to information allows RSE workers to stay up-to-date with any changes in regulations, policies, or procedures that may affect their employment. It also enables them to access resources and seek advice on various matters related to their work, living conditions, and well-being. By maintaining open lines of communication, workers can quickly raise concerns or report issues, allowing for prompt and appropriate action to be taken by the relevant parties.

Employers also play a key role in reinforcing these communication channels by providing induction training that emphasises the importance of respecting workers' rights and highlights the available resources for raising concerns or reporting issues.



d) NZKGI supports establishing a support package for RSE workers.

Employers and government agencies should work together to develop a standardised set of pre-departure information that covers workers' rights, employment conditions, and the resources available to them in New Zealand. This information should be provided in a language that workers can understand, and it should be easily accessible to them.

Once workers arrive in New Zealand, they should undergo a proper induction process that includes training on their rights, job duties, and the support available to them. Employers should provide clear information on how to raise issues or concerns, including contact details for their Pacific representatives and the relevant government agencies.

An RSE app that provides easy access to all necessary information and support could be a useful solution.

13. BENEFITS

a) NZKGI supports facilitative training.

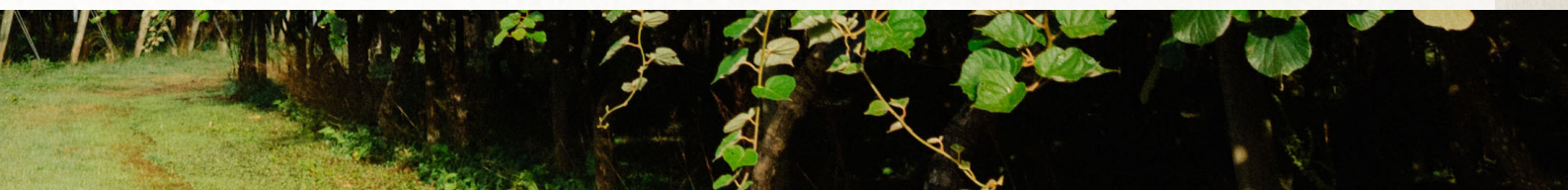
NZKGI advocates for a training program that is not only informative but also facilitative and rewards good behaviour through incentives. The training should provide RSE workers with the skills and knowledge they need to perform their job to a high standard, as well as opportunities for upskilling and personal development. By investing in the skills and abilities of RSE workers, employers can improve productivity, job satisfaction and worker retention, as well as the workers' employability in the long run.

Any training program and incentive scheme should be developed in consultation with RSE workers and their representatives to ensure it meets their needs and expectations.

b) NZKGI supports the implementation of a pre-departure process to enable access to Pacific superannuation schemes for workers from those Pacific Island Countries that have not yet adopted such systems.

RSE workers should be able to access their Pacific superannuation schemes.

This could be executed by incorporating the necessary information and documentation into the pre-departure process, ensuring that workers are informed of their entitlements and are provided with guidance on how to access their Pacific superannuation schemes. This may involve collaborating with relevant Pacific countries to establish streamlined processes and providing workers with the necessary support to navigate the process.



c) NZKGI opposes requiring an increase in minimum pay rates over time towards the median wage.

While it may seem reasonable to increase minimum pay rates to align with other immigration settings, such as skilled workers, this approach is not suitable for RSE workers. The RSE workers are mainly entry-level workers, and their wages are already commensurate with their skill level and experience.

It is important to take a balanced approach that considers both worker rights and industry sustainability. While fair compensation for workers is key, it is also necessary to ensure that the industry remains profitable and competitive, which can in turn provide more high-paying jobs for New Zealanders. Therefore, the focus should be on exploring cost-saving options, efficiency gains, and other initiatives that can support fair compensation for workers while also supporting the industry's profitability and competitiveness.

Implementing an increase in minimum pay rates for RSE workers over time, as proposed, could negatively impact the viability of many Kiwifruit growers, particularly those who depend on the RSE scheme for seasonal labour. This proposed increase would significantly raise labour costs, making it uncertain whether these businesses would be able to maintain profitability, ultimately resulting in fewer employment opportunities for all workers (including RSE and New Zealand workers), particularly in smaller growing regions.

To avoid such negative outcomes, NZKGI opposes increasing the minimum pay rates for RSE workers in this context. Instead, a collaborative approach is necessary that considers both worker rights and industry sustainability.

The potential impact of increasing minimum pay rates on the mental health of both orchard owners and employees cannot be ignored, particularly as many of these businesses are family owned. This proposal could lead to a significant negative impact on the wider economy, with many of these businesses going under, leading to job losses.

RSE workers are typically unskilled workers, and their wages are already set at an appropriate level for their skill level and experience. Instead of increasing minimum pay rates, efforts should focus on ensuring workers are treated fairly, provided with adequate support, training, and opportunities for upskilling. This approach will benefit both workers and the industry as a whole, contributing to its long-term success.

The Kiwifruit industry plays a key role in the New Zealand economy by generating significant export revenues and creating job opportunities for skilled and unskilled workers. As such, any changes to the minimum wage for RSE workers must be carefully considered to ensure that they do not negatively impact the industry's sustainability, profitability, and competitiveness. We should take a collaborative and balanced approach that considers the rights of workers as well as the industry's needs.

Moreover, any significant increases in RSE workers' wages could have a broader negative impact on the Pacific communities that the industry employs. If employers are forced out of the scheme due to affordability issues, this could have severe consequences for these communities. Additionally, such changes could indirectly affect local workers as well. If employers are unable

to afford to hire more RSE workers, they may choose to displace the local worker pool, which could have serious implications for the economy and the community.

14. OTHER RECOMMENDATIONS.

a) **NZKGI supports the need for more resourcing for the Labour Inspectorates.**

The current resourcing of the Labour Inspectorate is inadequate to ensure compliance with employment standards in the RSE scheme. As the scheme continues to grow the Labour Inspectorate should be provided with the necessary resources to effectively monitor and enforce.

The RSE scheme plays an important role in supporting the horticulture and viticulture industries in New Zealand. However, this cannot come at the expense of the rights and wellbeing of workers employed under the scheme. The Labour Inspectorate serves as an important safeguard to ensure that these workers are treated fairly and justly.

After consultation with the Bay of Plenty Labour Inspectorate, it has been determined that the addition of three more specified Labour Inspectorate roles would provide sufficient resourcing. This increased allocation would enable the Labour Inspectorate to more effectively monitor and enforce compliance with RSE scheme requirements and ensure the fair treatment of workers. By providing adequate resources, we can improve the integrity of the scheme and protect the interests of both workers and employers.

The RSE Visa Application Fee is currently set at \$325 NZD, and a portion of this fee could be used as a source of income to support the Labour Inspectorate with additional resources.

b) **NZKGI supports a 30-hour per week average over a four-week period requirement.**

NZKGI recommends for the removal of the 30 hours a week requirement in the RSE scheme and replacing it with a 30-hour per week average over a four-week period. This change would address the challenges faced by employers.

The current policy of 30 hours a week every week was introduced as a response to the border exemptions, with the main focus being on ensuring RSE workers were paid while in Managed



Isolation and Quarantine (MIQ). However, this policy has caused significant issues for both employers and workers.

We have heard from a kiwifruit industry employer who had to top up their RSE employees by \$100,000 over a six-week period due to heavy rainfall affecting work availability. This financial burden has prevented the employer from investing in much-needed purpose-built accommodation for their RSE workers. Such cases are not uncommon and can severely impact the ability of employers to provide better working conditions and retain their workers.

By replacing the current policy with a 30-hour average over a four-week period, employers would have more flexibility in managing fluctuations in productivity and weather-related challenges. This change would also provide greater financial stability to employers and reduce the need for them to top-up wages during periods of low productivity.

In addition to supporting a 30-hour average over a four-week period requirement for RSE workers, NZKGI suggests that this change should be implemented in combination with a minimal payment each week to ensure that workers have enough to meet their basic needs. This approach would provide greater financial stability for workers while still allowing for the flexibility needed to meet seasonal demands.

It is important to note that this change is being suggested in recognition of the unique nature of the RSE scheme and the need to balance worker rights with industry sustainability. It is not intended to diminish the importance of providing fair compensation to workers for their time and effort. Instead, this approach aims to strike a balance between the needs of workers and the needs of employers, while also taking into account the weather dependent nature of the horticulture industry.

The current government appears to be moving all visa categories towards a median wage. Other visa categories do not come with the same additional cost burden. This includes the cost of providing accommodation, partial payment of flights, and other expenses. These additional costs can be a significant burden for employers who operate on tight margins.

c) NZKGI supports providing all communication materials in the language of RSE worker.

Providing communication in a way the RSE worker can understand is important. Lack of understanding of their rights, responsibilities, or the terms of their contract puts RSE workers at a significant disadvantage and makes them vulnerable.

Information leaflets and employment agreements should be provided in the language of the RSE worker, enabling them to understand their rights and obligations. This will also empower them to make informed decisions about their employment and feel confident to speak up if they encounter any issues or concerns.

Not all RSE workers have the ability to read and write in the language of their host country. This presents a significant challenge to their ability to comprehend and communicate important information such as safety guidelines, employment contracts, and their worker rights.

One possible solution is to provide translated versions of all essential communication materials in the languages commonly spoken by RSE workers. Employers, industry associations, and government agencies can collaborate to ensure accurate translation and easy accessibility of information for workers. This could involve using multiple forms of communication, such as written, verbal, in-person, and visual aids such as pictures or diagrams.

Additionally, language training programs can be implemented to improve RSE workers' language skills and provide them with the necessary literacy tools to communicate more effectively in English. Offering language classes and providing training materials in various formats, such as audio and visual aids, can cater to different learning styles and increase language proficiency.

d) NZKGI supports establishing a more consistent and equitable accreditation process.

One important aspect of this is the introduction of a high inspection rate for questionable employers. This could involve conducting regular and surprise inspections of workplaces to ensure that workers are being treated fairly and that the conditions of their employment meet legal and ethical standards. This would also help to deter employers from engaging in exploitative practices, as they would be aware that they are more likely to be caught and held accountable.

A similar accreditation process to consider is the implementation of a vetting procedure akin to the Zespri Compliance Assessment Verification (CAV) program. This program entails a comprehensive evaluation of employers wishing to participate in the RSE scheme, including assessments of their compliance history, financial standing, and employment practices. This approach ensures that only reputable and responsible employers gain access to the RSE scheme, and that RSE workers receive protection from potential exploitation.

e) NZKGI supports the implementation of an RSE Worker App.

NZKGI has recognised the potential benefits of implementing a downloadable application on RSE workers' phones. Such an app could serve as a centralised hub of information for workers, providing them with access to important resources and guidance on a range of issues. This could include information on employment rights, health and safety protocols, and workplace policies, as well as practical information on local services and amenities.

The app could prove beneficial in many ways. Firstly, it could provide valuable information to workers, which could help them adjust to their new environment and work practices. They could learn about their rights and entitlements and access important resources to help them cope with their work-related tasks. In addition to this, it would make the information easily accessible, making it easier for the workers to understand and apply it in their daily work routine.

The app could mitigate exploitation and improve the overall welfare of RSE workers. By providing workers with clear and concise information on their rights and entitlements, they would be better equipped to identify and report instances of exploitation or mistreatment. This would help to prevent abuses of the system and ensure that workers are treated fairly and with dignity.

An app could help to promote greater communication and collaboration between employers, workers, and industry stakeholders. It could facilitate the sharing of best practices and encourage greater transparency and accountability across the industry. By working together to support the welfare of RSE workers, the industry can help to build a more sustainable and successful future for all stakeholders.

The majority of RSE workers have smartphones as they use these phones to keep up communication with their families back home. Therefore, the app would be easily accessible to the workers. It could be designed to have a settings feature in which it would be translated into the language of the worker, making it more user-friendly. In contrast, paper documents can easily get lost or damaged, posing a challenge to the workers.

Overall, the implementation of a downloadable app for RSE workers represents a significant opportunity for the industry to improve working conditions and promote greater transparency and collaboration. As such, NZKGI supports the development and implementation of such an app.

f) NZKGI supports the provision of basic budgeting and financial literacy training for all RSE workers.

NZKGI recognises the importance of ensuring that all RSE workers have the necessary financial literacy skills to manage their earnings effectively during their time in New Zealand. Many RSE workers come from developing countries and may not have access to the same level of financial education as New Zealanders or workers from other developed countries.

RSE employers frequently lack guidance on proper financial management, resulting in instances where RSE workers end up relying on food banks due to poor allocation of their wages.

To address this issue, NZKGI supports the provision of budgeting and financial literacy training for all RSE workers. This training could cover a range of topics, including basic financial literacy skills such as budgeting, saving, and managing debt, as well as more specific information tailored to the individual's needs. This training would help ensure that all RSE workers have a basic understanding of how to manage their earnings effectively and avoid any potential financial pitfalls.

Vakameasina is a program with great potential to provide financial management training for RSE employers. By partnering with Vakameasina, RSE employers can access specialised training and resources to help them manage their finances effectively.

15. CONCLUSIONS

The RSE scheme has played a significant role in the success of the New Zealand kiwifruit industry, providing a key and significant proportion of the seasonal workforce. While there is a need for improvements to the well-being and working conditions of RSE workers, it is important to acknowledge the important role they play in the industry's growth and success.

NZKGI advocates for the RSE scheme to have greater clarity, defined and consistent standards, and measurable outcomes. Achieving this standardisation and transparency is imperative for the scheme's success and to ensure that all stakeholders are working towards the same goals.

Colin Bond



**Chief Executive
NZKGI**

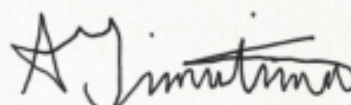
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APPENDICES

I APPENDIX 1

An example of an Allocation Model

The proposed allocation model for the RSE scheme would assess each employer based on their ability to provide suitable accommodation and pastoral care, commitment to upskilling and training of New Zealanders. Employers would provide a 48-month plan with actual and projected data on producing hectares, permanent and seasonal workforce, and accommodation. The model would also include engagement with the Pacific Island Nations, Ministry of Social Development (MSD), and Labour Inspectorate. All potential increases would be added together, and only if greater than aggregated Pacific supply, they would be prorated. The model aims to ensure a fair and transparent allocation of RSE workers while adhering to the scheme's CAP.

Information Employers would need to produce:

- **Each employer supplies a 48-month labour strategy and plan.**
 - » The actuals from the last 12-months
 - » The projected 36-months
 - » Labour strategy – attraction and retention initiatives
- **Each month should include:**
 - » Producing Hectares – only once per year
 - » Permanent workforce
 - » Seasonal workforce – broken down to:
 - New Zealanders
 - Backpackers/Working Holiday Visa Holders
 - Recognised Seasonal Employees
 - Other – i.e student visa etc
- **Accommodation**
 - » Currently approved beds
 - » Projected source of beds



Information from the Pacific Island Nations:

Pacific Island Nations can choose to support or oppose increased employer allocations for RSE workers, contingent on the collaboration and partnership between employers and the workers' local communities from which RSE workers are recruited.

NOTE: A guideline of what collaboration and partnership may look like would need to be created.

Information from the MSD:

The MSD would either support or not support an increased allocation from each employer depending on the labour strategy, level of involvement and interaction between the employer and MSD.

MSD is responsible for administering and overseeing various social and economic programs in New Zealand, including the RSE scheme. As such, the input from MSD is an important indicator of the employer's commitment to the program, as well as its ability to work effectively with government agencies.

NOTE: Standardised guidelines on what good engagement with MSD is would need to be created.

Information from the Labour Inspectorate:

The Labour Inspectorate would either support or not support an increased allocation from each employer depending on the information that they have pertaining to the accommodation, pastoral care and any breaches.



I APPENDIX 2

Example of a RSE Employer Breaches Table.

To maintain the integrity and effectiveness of the RSE scheme, it is imperative to establish a clear system for categorising and addressing breaches of compliance. The scale of these breaches can be categorised into three categories: **Critical, Major, and Minor.**

Critical breaches are the most severe and could result in the loss of accreditation for the employer. These breaches would include instances of serious exploitation, neglect of worker safety, or significant violations of employment law.

Major breaches are serious but may not warrant the loss of accreditation. These breaches could result in the suspension of accreditation or a reduction in the employer's allocation of RSE workers.

Minor breaches are less severe and may result in a warning or a reduction in the employer's allocation increase at the next review.

Repeated Minor infringements may become a Major breach, and repeated Major infringements may become a Important breach.

To ensure transparency and fairness in the compliance process, it is recommended that clear guidelines and procedures for addressing breaches are established and communicated to employers and consistently applied by government officials. Additionally, employers should have the opportunity to appeal any decisions made regarding breaches of compliance.

Examples of the types of infringements are listed below.

Critical

- Physical, mental and/or verbal abuse of workers
- Overcrowded accommodation
- Use of accommodation that is not approved by the Labour Inspectorate
- Use of employment agreements that are not approved by the Labour Inspectorate
- Not providing appropriate pastoral care. i.e. not seeking medical aid when requested
- Breach of employment law
- Not allowing the Pacific Liaison Officers or other officials visit the workers
- Not having transport available for the workers for their personal needs
i.e. grocery shopping etc
- Restriction of worker movements and actions within their free time
- Allowing your RSE Employee work for another employer without original employer supervision and/or a service agreement.

Major

- Not allowing to practice the workers faith.
- No maintaining documentation i.e. sign in sheets
- Making too many deductions compared to the amount the worker will receive in hand – Could become important if policy change.
- Not providing appropriate pastoral care i.e. not being reasonably available to clarify anything for the workers
- Not having transport available for the workers for their personal needs i.e. grocery shopping etc
- Breach of Employment Agreement
- Any changes to which accommodation is being used, not listed on the ATR, that has not been notified to the relevant authority (RSE unit and LI)
- Restriction of worker movements and actions within their free time

Minor

- Pay slip errors.
- Breach of Employment Agreement
- Not maintaining documentation i.e. sign in sheets
- Not providing appropriate pastoral care i.e. not being reasonably available to clarify anything for the workers
- Restriction of worker movements and actions within their free time



I APPENDIX 3

Example of a Deductions Guideline to be used by the Labour Inspectorate.

Having clear and consistent deduction guidelines for the RSE scheme will help create a fair and transparent work environment that benefits both employers and workers.

The following guidelines aim to offer clear direction on allowable and non-allowable expenses for deduction under the RSE scheme.

All deductions must be properly justified and supported by evidence, and the Labour Inspectorate must be provided with this information for approval. Examples of evidence that could be submitted to support a deduction include a copy of a power and gas bill for the month in question, or a weekly grocery bill along with documentation outlining the wages paid to a chef or other staff member responsible for food preparation.

In addition to these examples, it is important to note that deductions for accommodation and transport expenses must be reasonable and proportional to the actual costs incurred. Deductions for other expenses, such as medical fees or uniforms, should also be reasonable and supported by appropriate documentation.

Partial Board Inclusions

- Room rent
- Power & Gas
- WiFi
- Cleaning (staff &/or products)

Rent Inclusions

- Third party accommodation costs
- Maintenance
- Rates
- Water
- Facilities Manager



Other Acceptable Deductions

- Food (if supplied)
- Transport
- International Flights
- Clothing (not including PPE or tools to carry out the work)
- Phones
- Traffic fines
- Advances
- Prescriptions – at any point can it be a deduction.

Unacceptable Deductions

- PPE
- Bedding
- Tools to carry out the work

Example of costings for rent and partial board

Rent		Partial Board	
Third party cost	\$ 19,097.40	Rent	\$ 25,607.81
Maintenance	\$ 781.25	Power & Gas	\$ 1,562.50
Rates		Internet	\$ 312.50
Water	\$ 520.83	Cleaning (Staff & Products)	\$ 2,239.58
Facility Manager	\$ 5,208.33		
Total Per month	\$ 25,607.81	Total per month	\$ 29,722.40
Per person per month	\$ 640.20	Per person per month	\$ 743.06
Per person per week	\$ 147.74	Per person per week	\$ 171.48

Identifying an appropriate board charge for RSE workers should consider the seasonal (7 to 9 month) nature of the scheme. Yet, when constructing purpose-built accommodation for RSE workers, accommodation owners need to take the 12-month holding costs into account.

