

Submission by the Australian Nursing and Midwifery Federation

PALM Scheme Deed and Guidelines Review

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Australian
Nursing &
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Federation



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Introduction

1. The Australian Nursing and Midwifery Federation (ANMF) is Australia's largest national union and professional nursing and midwifery organisation. In collaboration with the ANMF's eight state and territory branches, we represent the professional, industrial and political interests of more than 345,000 nurses, midwives and carers across the country.
2. Our members work in the public and private health, aged care and disability sectors across a wide variety of urban, rural and remote locations. We work with them to improve their ability to deliver safe and best practice care in each and every one of these settings, fulfil their professional goals and achieve a healthy work/life balance.
3. Our strong and growing membership and integrated role as both a professional and industrial organisation provide us with a complete understanding of all aspects of the nursing and midwifery professions and see us uniquely placed to defend and advance our professions.
4. Through our work with members, we aim to strengthen the contribution of nursing and midwifery to improving Australia's health and aged care systems, and the health of our national and global communities.
5. The ANMF welcomes the opportunity to provide feedback on the Pacific Australia Labour Mobility (PALM) Scheme Deeds and Guidelines review. We believe that this an ideal opportunity to improve the conditions for those participating in the PALM Scheme.



6. The Australian Nursing Midwifery Federation (ANMF) supports the Submission of the ACTU for the review into the Deed and Guidelines. In addition to providing support for the ACTU submission the ANMF would like to provide further feedback that we believe is pertinent to our members and their interests within the aged care sector under this scheme.

PALM Deed and Guidelines Review

Wellbeing support, cultural competency and wellness

7. The ANMF would like to raise concerns about the adequacy of welfare and wellbeing support for PALM workers, in particular women. We are concerned about the lack of access to culturally appropriate and affordable healthcare. We understand PALM workers are required to have private health insurance however they do not have access to Medicare. This is particularly concerning as the costs associated with healthcare are exceptionally high and private health insurance does not cover all costs.
8. The ANMF strongly supports the ACTU's call to extend access to Medicare to the PALM scheme as highlighted in the UN Special Rapporteur on Contemporary Forms of Slavery report on Australia which recommended that the Government 'ensure all workers are eligible for basic protections, including Medicare'. ⁽¹⁾
9. Private health insurance does not cover all costs associated for basic healthcare, the worker is still required to pay 'gap' fees and included costs associated with the treatment or care required. Wait times are also associated with private health insurance which effect those participating in the PALM scheme, particularly during pregnancy. Under the NIB PALM cover ⁽³⁾, there is a 12 month wait time for pregnancy related healthcare. This means that if a worker is pregnant before this time elapses, there is no cover and the inability to pay for care.



10. PALM scheme workers are exposed to situations of gender and sexual based violence; this violence can occur in accommodation provided by the employer and can result in sexually transmitted diseases and unwanted pregnancies. Women in this situation can sometimes also face the risk of dismissal because of pregnancy, even where that is clearly discriminatory action by the employer. This risk, together with the stigma attached, can lead women to access dangerous means of terminating pregnancies, especially in the absence of access to services due to lack of Medicare benefits ⁽¹⁾. This lack of support for reproductive justice within this scheme means that women are faced with impossible decisions, isolation and fear.
11. There are complex issues around the access and understanding of sexual and reproductive healthcare within the Pacific nations, these include social stigma, religious and customary values and principles ⁽²⁾. There is a strong need for culturally sensitive sexual and reproductive health education for those participating in the PALM scheme. While the ANMF recognises that the Deeds and Guidelines review may not be the most appropriate opportunity to encourage reform in this area, it is necessary to ensure this much needed reform is discussed.
12. With high rates of sexually transmitted infections (STI's) as well as sexual and gender-based violence, it is imperative that those partaking in the PALM scheme have opportunity to access sexual and reproductive health education that is culturally appropriate as well as an ongoing opportunity to contact appropriate health care professionals when needed.
13. Pregnancy is a time of high vulnerability with the PALM workers, there is a significant level of uncertainty during this time ⁽²⁾. With a lack of health insurance coverage, future income, visa status and certainty around employment in question, the risk of exploitation and disengagement is high ⁽²⁾.



14. As well as the risk of exploitation and disengagement, the effects of having no access to sexual and reproductive healthcare as well as antenatal care is major concern. Women experiencing pregnancy who have little to no support are not able to gain the care they need, as well as the concerns around future employment, they experience cultural factors as well, due to shame that is sometimes involved, these women are less likely to reach out for assistance. This results in little to no antenatal care, finding un reputable providers of terminations and are not receiving the physical as well as mental health care they desperately require. Improved conditions and protections are essential for women partaking in the PALM scheme.
15. This lack of access to free, accessible and culturally appropriate care is of great concern to the ANMF. We insist that this issue is reviewed and rectified, the gender imbalance in this issue is extremely disappointing and we support actions that promote and improve the conditions for those participating in the PALM scheme, particularly for women.
16. To ensure that the worker has a successful experience in the PALM scheme, cultural competency training is required of those that are engaged with of the PALM scheme participants. There is a lack of understanding and cultural inclusivity in some workplaces, which is entirely unacceptable. There needs to be a meaningful approach to improving cultural awareness in the PALM scheme.

Transparency of Pay – Deductions

17. The ANMF would like to highlight the cost-of-living issues through the large amount of deductions that can be taken from PALM participants pay. This vulnerable group are expected to pay back the costs associated with travel to Australia, as well as pay for rent and living expenses.



18. The result of these deductions is an insufficient amount of disposable income to send back to support families or use to meet living costs. Unnecessary deductions have been taken out of workers pay's and due to the hesitancy to speak up about grievances this allows this practice to go on without accountability.
19. The ANMF would like to support a call to ensure greater transparency in deductions and an improved education on what costs are involved in this scheme before the PALM worker participates in the scheme.
20. Some workers participating in the PALM scheme are not aware of income tax and how this effects their take-home income, this greatly impedes their ability to send home money to support families and contributes to their overall accumulation of debt while in Australia.
21. The ANMF supports measures to ensure sufficient education on real-world experiences and accurate information about calculation of net income is provided to PALM workers. Any education and information must also be delivered in a timely and culturally appropriate manner.

Arrival/Departure Briefings

22. The ANMF, together with other health sector unions, represents members in the aged care industry. It is vital that we are involved in the Arrival and Departure briefings for those participating in the PALM scheme.
23. We are aware that within the current iteration of the PALM Deeds and Guidelines that it is a requirement that Unions are informed and involved in arrival briefings, however we have had limited contact. There seems to be hesitancy as to whose responsibility it is to inform unions of these briefings and allow for union involvement. This would be key to helping inform PALM workers of their rights within the workplace and support the wellbeing of the workers.



24. We recommend a streamlined approach be taken to informing relevant stakeholders of arrivals and that the Department of Employment and Workplace Relations (DEWR) be accountable for ensuring this is occurring. This is essential for a true tripartite approach to the PALM scheme.

Labour mobility and portability of entitlements

25. The lack of portability under this scheme for the worker is inherently a high risk for exploitation of the worker. As highlighted in the UN Special Rapporteur on Contemporary forms of Slavery report on Australia, those that participate in the PALM scheme ‘face the most significant risks of exploitation and contemporary forms of slavery’⁽¹⁾.

26. The bonding of the worker to the approved employer creates an exceptionally high power imbalance that allows for employers to exploit the workers. These exploitive practices can include, underpayment, excessive deductions, racial discrimination, sexual and gender based violence, just to name a few. We call for the ability of PALM workers to be able to move to another employer if they experience exploitation without loss of entitlements or adverse impacts on their visa status. In addition, PALM workers should have the freedom to move employers within the scheme, in order to access improved work opportunities for themselves and their families.

27. The ANMF considers worker mobility is essential to protect against exploitative practices and to allow genuine employment opportunity. Labour mobility and preservation of entitlements will assist with maintaining positive engagement in the PALM scheme.



Conclusion

28. The ANMF welcomes the opportunity to provide feedback on the PALM Scheme Deeds and Guidelines review, we support the submission by the ACTU and believe that this review can be a positive driver for change. We fully support a true tripartite approach to the scheme and look forward to continuing to work with all parties towards improving working and living conditions for PALM workers.

Reference

- (1) Obokata, T. (2025) *Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, Tomoya Obokata, on his visit to Australia*, UN Human Rights Council. Accessed: [UN Special Rapporteur report spotlights gaps in Australia's anti-slavery response | Australian Anti-Slavery Commissioner](#)
- (2) Kanan, L. (2025) *"It's not illegal to be pregnant": Research report on reproductive justice and the Pacific Australia Labour Mobility scheme*, Development Policy Centre, Australian National University.
- (3) nib Group (2025) 'PALM Health Hub', nib. Available at: <https://www.nib.com.au/overseas-health-insurance/palm-health-hub>