

July 2026

Kia manaaki i te manene

Respecting and protecting migrant workers

A CAB spotlight report about migrant worker
exploitation in Aotearoa New Zealand.



Citizens **Advice** Bureau

Ngā Pou Whakawhirinaki o Aotearoa



He karakia | Te Mana

<i>Te mana ki runga</i>	<i>The power above</i>
<i>Te mana ki raro</i>	<i>The power below</i>
<i>Te mana ki roto</i>	<i>The power within</i>
<i>Te mana ki waho</i>	<i>The power beyond</i>
<i>Tihei mauri ora!</i>	<i>Let there be life!</i>

This karakia offered to CABNZ Aotearoa some time ago, continues to capture for us the essence of who we are as an organisation and what motivates us in our mahi. That is to uphold the mana, or inherent dignity, of all people regardless of who they are or where they come from. It is a powerful declaration and reminder of the mana that exist.

He whakatauākī

Kia manaaki i te tangata rahi, i te tangata iti.... E puta te ope ware ki tō kāinga, hoatu tō kai rauhi māna, mā konā koe, ka rangona e ngā nohoanga tāngata e haere ai ia.

Care for all people both great and small.... When a visiting commoner arrives at your home, give them your best food and as a result you will be known by people wherever you go.

The name and opening of this report, is inspired by the exhortation of the 19th Century rangatira, Moihī Te Matorohanga, whose words were a reminder of the tikanga of offering manaaki to all people. A fundamental principle of te ao Māori directly relating to the enhancement or diminishment of mana. Whether inherent, ascribed, individual, or collective.

This principle of ‘manaaki i te tangata’ is also evident in New Zealand’s founding documents of *He Whakaputanga o te Rangatiratanga o Nu Tīreni* 1835 and *Te Tiriti o Waitangi* 1840. Rangatira who signed He Whakaputanga emphasised the importance of the ‘atawhai’ and ‘tiaki’ – ‘friendship and protection’ that they had extended to Pākehā who had already been living on their shores. While Te Tiriti was, and remains, the first immigration document allowing Pākehā and tauīwi to settle here.

This spotlight report seeks to not only shine a light on the issues of exploitation experienced by vulnerable migrant workers, but also further addresses the need for societal and systemic change. It reveals how well we are caring for the migrant who has been welcomed to our Kāinga, and where we are falling short. And it is a reminder and exhortation to us all – kia manaaki i te tangata rahi, i te tangata ihi. Kia manaaki i te manene.

He mihi | Acknowledgements

Nau mai whakapiri mai koutou katoa. E ngā mana, e ngā reo, e ngā hau e whā, tēnā koutou, tēnā koutou, tēnā tātou katoa.

E whakamānawa ana mātou i te tangata whenua o Aotearoa. E whakapau kaha ana koutou ki te manaaki i te tangata rahi, i te tangata iti. E whakawhētai ana mātou mō tēnei manaakitanga nui, hei tauira mā te katoa.

Draw near and welcome to all. All authorities, all voices, everyone from the four winds, we greet you all.

Citizens Advice Bureau New Zealand | Ngā Pou Whakawhirinaki o Aotearoa recognises the mana and unique place of Māori as tangata whenua of Aotearoa. We are grateful for their generous expression of manaakitanga that has so often been demonstrated to all people, no matter who they are or where they are from. An exemplar for us all.

We acknowledge those whose experiences of exploitation as migrant workers are represented by the stories and data contained within this report. May your endeavours to build a flourishing life for yourselves, your whānau, and your communities bear fruit. Nau mai, haere mai. You are welcome.

Finally, to the many CAB volunteers throughout the motu, without whom our mahi would not be possible, you are the true pou whakawhirinaki (support posts) that keep our service standing. Mauri ora ki a tātou.

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Executive Summary

This report examines migrant worker exploitation in Aotearoa New Zealand through Citizens Advice Bureau (CAB) enquiries received between May 2024 and May 2026. Our analyses of these enquiries are intended to help understand the nature and scale of the issues being faced by migrants; who is affected, what the evidence shows, and what practical action is needed. Taken together, the findings show that migrant exploitation is not isolated or exceptional, but it is a persistent and likely underreported problem shaped by both unlawful employer behaviour and wider systems that leave migrants vulnerable.

This report sits within the broader context of immigration and employment legislation, which most people in Aotearoa New Zealand uphold, which entitles all workers to minimum employment rights, dignity, and safety.

CAB enquiries show that migrant exploitation is occurring across multiple industries, occupations, and regions. Reported experiences of exploitation include underpayment, withheld wages, reduced or inconsistent hours, unsafe or degrading accommodation, bullying, control, coercion, threats linked to visa status, unfair disciplinary processes, and barriers to leaving harmful work.

This report analyses approximately 1,000 enquiries, over a two-year period, examining demographic patterns, recurring enquiry themes, and anonymised case studies. We have used the case studies to illustrate lived experience behind the data and to show how exploitation unfolds in practice, including the kinds of supports migrants need while they navigate employment, immigration, and housing issues as well as accessing basic needs.

The findings indicate that exploitation is occurring in Aotearoa and that it is likely significantly underreported. Migrants seeking CAB help are commonly on work visas and are disproportionately represented among people identifying as Asian and Latin American, although affected clients come from many backgrounds.

Enquiries show that harm is happening across trades and services, including primary industries, hospitality, transport, healthcare, construction, beauty services, retail, and other sectors. They also show that exploitation is frequently compounded by the difficulties people experience when dealing with Immigration New Zealand where they are often having to navigate complex processes, delays, inconsistent information, and limited access to timely assistance.

This report highlights the serious consequences for migrants experiencing exploitation and their families, these include debt, food insecurity, housing instability, worsening physical and mental health caused by prolonged uncertainty, and pressure to remain in or return to exploitative situations. It also shows that community organisations often carry a significant share of the response by providing advocacy, interpreting services, food, housing support, legal help and referrals and, and system navigation. The fact that our enquiries show that migrants are needing lengthy sessions and return to the CAB multiple times for further support reflects the complexities of people's situations and of the wider system. It highlights the existing gaps in justice and support for migrant workers.

These experiences of migrants who are coming to the CAB for support show us that current protections are not strong enough to prevent or respond effectively to migrant exploitation. The power imbalance in the employment relationship, and the critical importance of having income, mean that many employees hesitate to question or challenge their employer's disregard for the law.

Our Actionable Insights (see the full list of our Actionable Insights at the end of report) highlight that what is urgently needed is removing employee dependency on one employer in visa settings, extending Migrant Exploitation Protection Visas, improving safe reporting pathways, strengthening enforcement of employment law, ensuring timely access to basic living support and legal advice, improving the fairness and accessibility of mediation and immigration processes, and providing clear, accessible rights and obligations information for both migrants and employers. Coordinated system change needs to be instigated so that migrants can work in safety and dignity, and so decision-makers, service providers, and communities can act with greater confidence and urgency.

Introduction

This report draws on enquiries from migrants to the Citizens Advice Bureau (CAB) about employment and living conditions to:

- build an understanding of the scale of migrant exploitation in Aotearoa New Zealand
- illustrate the impact of exploitation on migrants and their families
- identify, and advocate for, practical changes that can help eliminate migrant exploitation.

Everyone deserves to live with dignity, free from harm and exploitation at their workplace. As a country, we invite people to work and live in our communities, and these people come to build a better life for themselves and their families. Elements of our immigration policies and employment law create the conditions for exploitation of migrants. We need to understand the experiences of migrants to be able to eliminate the drivers of exploitation that are failing our communities so that we can make things better for the people living and working here.

New Zealand has a comprehensive framework of employment laws designed to uphold minimum standards and ensure good faith in all employment relationships. Despite this, the Citizens Advice Bureau is regularly responding to enquiries from clients whose minimum employment rights are being breached. The power imbalance in the employment relationship, and the critical importance of the income derived from it, mean that many employees hesitate to question or challenge their employer's disregard for the law.

This is the general context within which the specific exploitation of migrant workers takes place. The situation is exacerbated for migrant workers because of additional vulnerability due to their visa status (and the threat to this). This vulnerability is amplified with employer assisted visas, where an employer has even more power regarding a migrant's circumstance.

What is migrant worker exploitation?

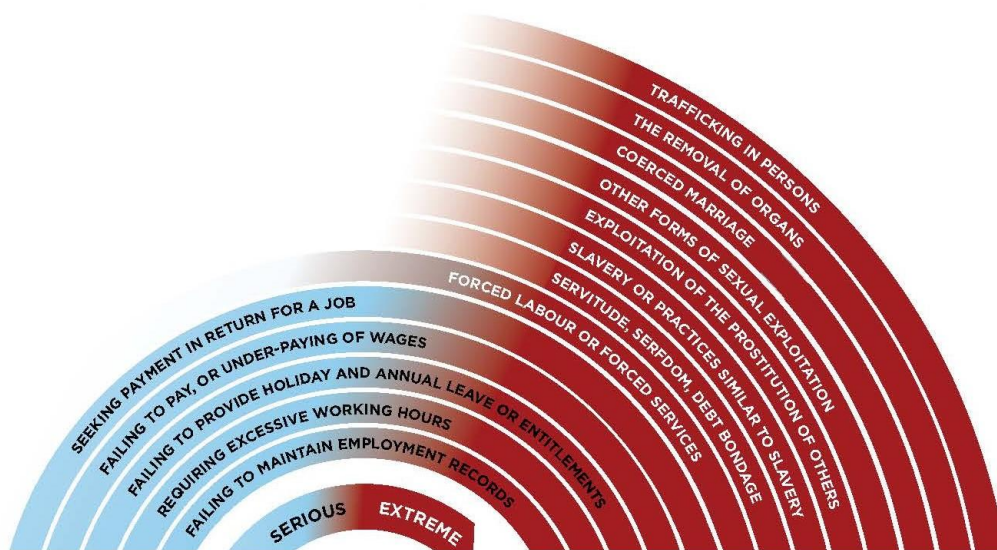
Migrant worker exploitation occurs when employers disregard a worker's rights and takes advantage of a person's lack of local knowledge and laws, lack of support structures such as family, and reliance on visa compliance to remain in the country. Exploitation can take many forms and is seen in behaviours such as:

- not paying or under paying agreed wages
- providing inconsistent and less hours than agreed
- demanding excessive work hours
- requiring a person to pay a fee to be employed in a job
- not providing an employment contract
- denying access to annual or sick leave, and not paying employment entitlements, such as mileage or overtime
- withholding wages as a charge for business expenses, such as work equipment

- providing accommodation which is unsanitary and controlling the employees' living conditions
- exerting abuse - emotional or physical – on the employee including threatening their visa status, retaining and withholding passports, or threatening personal or family safety
- making non-negotiated changes to employment contracts
- compromising employees' safety due to lack of health and safety measures
- unfair or constructive dismissal of employees
- controlling and monitoring movement and communication of employees.

Worker exploitation includes a continuum of experiences, ranging from employees experiencing some of their employment rights being breached, through to experiences of human right breaches including sexual exploitation and forced labour characteristics, which can be seen in crimes such as slavery and people trafficking (see Figure 1).

Figure 1 Illustrating the exploitation continuum using some forms of exploitation to highlight a range of breaches and offences associated with exploitation (Sourced from: *Combatting modern forms of slavery. Plan of Action against Forced Labour, People Trafficking and Slavery, 2020-25. MBIE*)



A range of practices referenced in the diagram above are criminalised in New Zealand's legislation, including the *Immigration Act 2009* and *Crimes Act 1961*.

How employers view migrant workers can affect how migrants are treated in Aotearoa New Zealand. Some employers view migrant workers primarily as a potentially very cheap and easily manipulated source of labour and profit, rather than as human beings with feelings, hopes and dreams. While being granted approval to live and work in Aotearoa is a privilege, lawful treatment in the workplace is a right all people in this country are entitled to – and should be receiving – regardless of their visa status.

CAB enquiries illustrate Migrant worker exploitation in Aotearoa New Zealand

The fact that migrant worker exploitation is currently experienced in Aotearoa New Zealand is evidenced by the enquiries we regularly receive from migrant clients regarding their employment, housing, health, immigration, and access to basic needs.

CABs across the motu (country) are supporting distressed migrants who are being abused by their employers, living in unsafe accommodation, struggling with not being paid, being overworked, having their freedom restricted and their human rights breached.

CABs are also providing support for a small number of people whose dire situations equate to human trafficking. To protect client identities and because trafficking is a subset of exploitation, this report will focus on how, and in what industries, we see migrants experiencing exploitation.

The scale of migrant worker exploitation in Aotearoa New Zealand

Between May 2024 and May 2026, our records show that approximately 1,000 enquiries were identified as involving migrant exploitation. This figure is just from the people who have come to CABs for help and very likely only represents a fraction of those affected. Many more people may be experiencing such abuse who are not seeking help. CAB managers report that at times people do not want any details recorded about their enquiry to the CAB due to fear of being found out and potentially losing their job or being discriminated against by their employer. These enquiries are therefore missing from our data.

Each enquiry often reflects the experiences of a wider group who struggle to find a voice, frequently silenced by fear of repercussions. Migrant workers may face serious consequences for questioning their circumstances, including physical harm, personal threats, or threats against their loved ones. Others report further restrictions and exploitation, such as being required to work longer hours without pay, being denied leave, or having their immigration status used as a form of coercion.

Who is impacted by Migrant Exploitation

Our data

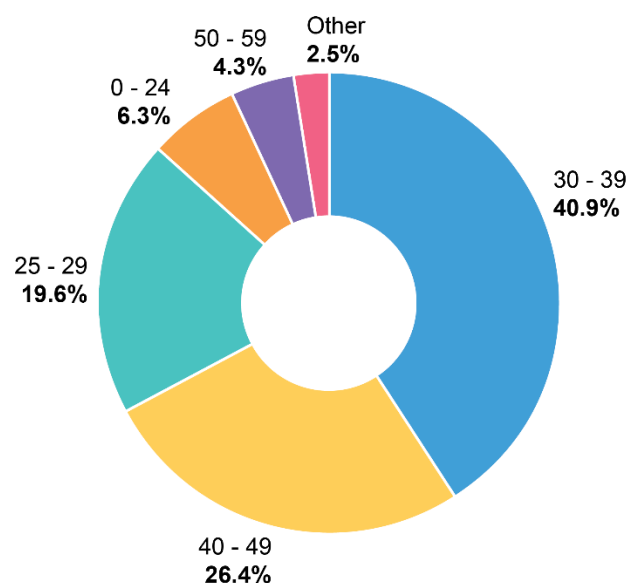
All enquiries are recorded in the national CAB database by our volunteer interviewers. For our in-depth enquiries we collect information about the person's situation, the topic they need help with, the information and options for next steps shared, and some basic demographic details.

Demographic profiles

People using the CAB service regarding migrant exploitation represent a variety of age, ethnicity, and gender.

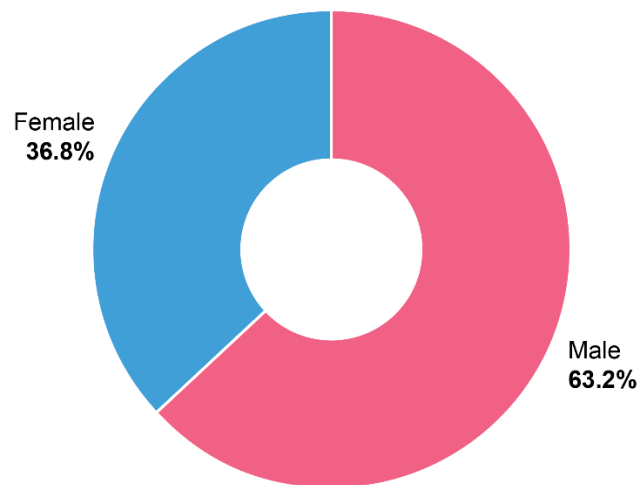
Our data shows that migrant exploitation can impact young people, less than 25 years of age, but our data shows that the biggest group impacted are those between 25 to 49 years of age. This group of people likely have families to support and are in their prime earning potential period.

Figure 2 Representation by age group for migrants seeking help from cab regarding exploitation May 2024 – 2026



Migrant exploitation enquiries more often involve individuals identifying as male, although a substantial proportion identify as female. This gender pattern differs from general CAB migrant enquiries, where females make up the majority (57%) compared with males (43%), a distribution similar to wider employment-related enquiries (53% female, 44% male). Gender-diverse identities are recorded but are not reported here due to small numbers that could compromise anonymity.

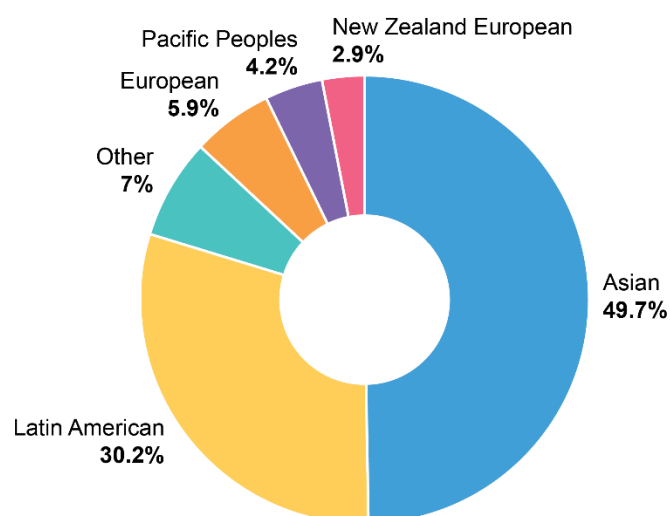
Figure 3 Representation by gender for migrants seeking help from cab regarding exploitation May 2024 - 2026



People identifying as Asian (50%) and Latin American (30%) are disproportionately represented among those seeking CAB help for migrant exploitation, though other groups, including Pacific Peoples and Europeans, are also affected. This ethnic distribution differs from general migrant enquiries, where Asian clients make up 25%, Pacific Peoples 9%, and Latin Americans only 3%.

Some enquiries involving New Zealand Europeans are likely made by intermediaries or employees seeking advice regarding potential exploitation in their workplaces.

Figure 4 Representation by ethnicity for migrants seeking help from cab regarding exploitation May 2024 – 2026



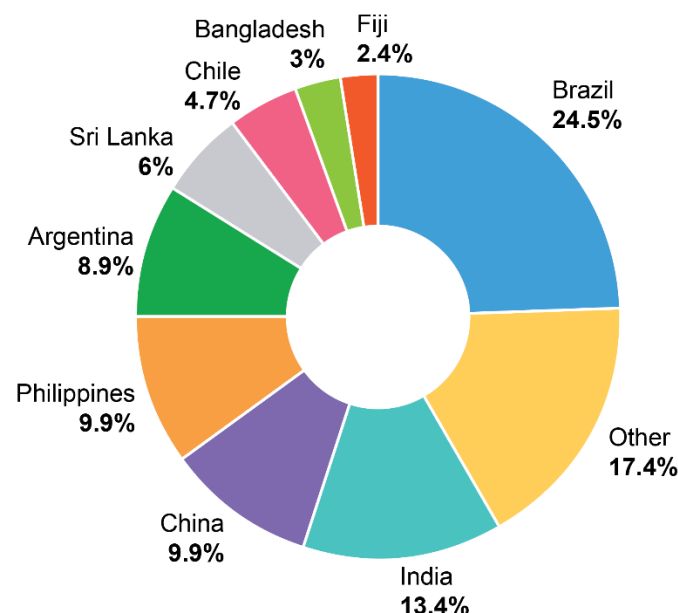
Some demographic data is collected from CAB clients, including how long they have been in New Zealand, their visa type, and their country of origin.

Most migrants seeking help for exploitation (over 80%) hold work visas, with around 8% on visitor visas and fewer than 5% holding residency.

Many affected migrants come from Asian and South American countries. This differs from general CAB migrant enquiries, where China (14%) is the most common country of origin, while exploitation-related enquiries are more concentrated among migrants from Brazil (25%), India (13%), China (10%), and the Philippines (10%).

Overall, the data shows that migrants experiencing exploitation come from a wide range of countries.

Figure 5 representation of the country of origin for migrants seeking help from cab regarding exploitation May 2024 – 2026



The amount of time taken to help people is recorded by the interviewer. Over 650 hours of CAB interviewer time has been spent over the last two years with people asking for information, advice, and support regarding migrant exploitation.

Our data shows that migrants seeking help regarding exploitation are needing to return multiple times to the CAB for further support.

The length of time taken in each interview also reflects the complexities of people's situations, with these interviews most often being 30 minutes to an hour long, with some extending to assisting a person for hours.

Insights, trends and issues illustrated by CAB enquiries

Consistent themes in migrant worker exploitation enquiries

Common enquiry themes include employment rights, workplace disputes, immigration and visa matters, and support to report migrant exploitation.

Many migrant workers seeking assistance are dealing with employment contract breaches, unlawful employer conduct, unfair dismissal, and other forms of workplace mistreatment such as unpaid wages, poor working conditions, workplace bullying and harassment. These issues can intersect with threats to visa status and risk of job loss.

Common visas that enquiries relate to:

- Migrant Exploitation Protection Visa (MEPV) applications
- Partnership visas
- Visitor visas
- Work visa extensions, and
- concerns about the legal status of employment and visas.

Common employment-related enquiries include questions regarding:

- Legal rights and options relating to unpaid wages, employer disputes, and other employment issues
- Support for workers experiencing exploitation or poor working conditions
- Guidance for workers facing workplace harassment, abuse, or threats from employers
- Help to identify whether a situation may constitute workplace exploitation.

Common immigration-related enquiries include questions regarding:

- Information on the steps and requirements for applying for or extending visas across different visa categories
- Support with Migrant Exploitation Protection Visa applications
- Help with immigration and other visa-related issues

It is very common for clients to have issues interacting with INZ about processes and eligibility.

Migrants are experiencing exploitation across job roles, industries, and locations

Our analysis of CAB enquiries shows that exploitation or workplace harm is reported across a broad range of industries, including trades and services, agriculture, hospitality, transport, horticulture, health care, and construction.

Clients seeking support are employed in a range of roles, including construction workers, farm hands, sales representatives, fruit and vegetable harvesters, beauty therapists, cleaners, restaurant and café front-of-house and kitchen workers, care workers, truck drivers, and chefs.

These enquiries were received from people living and working in a range of locations across Aotearoa New Zealand, including Queenstown, Auckland, Waikato, and Canterbury.

Migrants are experiencing problems dealing with Immigration New Zealand

Migrants seeking CAB help for worker exploitation often face difficulties dealing with Immigration New Zealand (INZ). While most enquiries are initially about employment issues, navigating the complex immigration system frequently becomes part of the enquiry.

Processing delays and inconsistent or poor communication

Common challenges include processing delays, poor communication, unclear or untimely information, and limited access to support—particularly due to the lack of in-person services and long phone wait times.

Complicated visa requirements and options

Many clients need ongoing support to complete INZ forms and to understand their visa requirements and options, particularly for Migrant Exploitation Protection Visas or work variation applications.

Complex processes are a significant barrier, especially for those who are already experiencing exploitation. These barriers to accessing and understanding INZ's systems and processes can increase migrants' vulnerability, particularly where their visa is tied to their employer.

Problematic process for establishing exploitation

People are also finding the triage process of establishing if exploitation is occurring problematic.

Firstly, if their situation is deemed eligible for investigation of exploitation, they receive a Report of Exploitation Assessment Letter (RoEAL). CAB Managers observe that often people do not understand the process described in the RoEAL letter.

In many instances, people are referred for Early Resolution which currently is a system overwhelmed with referrals. If a referral to the Labour Inspectorate or INZ is the pathway forward, people are filled with false hope of resolution but then experience long response times.

If the situation requires raising a personal grievance, the CAB is often needed to provide appropriate advice and referrals to ensure the required timeframes are met.

Employers who exploit workers often threaten already vulnerable employees by saying they will contact INZ to cancel their visas. These threats amplify the employee's insecurity and can prevent migrants from seeking help.

Lack of support once exploitation is being investigated

Another barrier for migrants is the lack of support available to them even when exploitation is being investigated or confirmed.

Migrants are experiencing prolonged wait times when they are needing to know the outcomes of investigations and applications from INZ and Employment NZ. Their stress and lack of success in getting protections from exploitation are increased by issues like not having the required documents because they are lost or if documents have been removed by their employer.

The time it is taking to process protections and allow for movement to another employer is a barrier for people and can force them to return to harmful employment situations, due to hardship experienced by not working. Migrants experiencing exploitation are not eligible for welfare support during investigative or visa application periods and need to rely on their own resources despite often not being paid wages for the work they have done and/or being forced to leave their employment related accommodation.

Case studies from CAB enquiries describe peoples' experiences

CAB enquiries illustrate peoples' experiences

The findings and recommendations in this report are informed by the experiences of clients who have come to the CAB for support. The case studies below reflect the lived experience of some of these people and further illustrate the very real challenges migrants in Aotearoa New Zealand face and the circumstances that lead them to seek help.

Each case study is a summary of multiple enquiries made to CAB interviewers often from multiple people, about the same company. These real accounts have had identities of clients anonymised to protect privacy. Together, the case studies highlight the patterns and themes we have identified across our migrant exploitation enquiries, and they provide valuable insight into the realities for clients that lie behind the data.

Case Study 1: Trades and Services Company

A group of trade services employees came to the CAB about their employment rights under the Accredited Employment Work Visa. They reported having similar employment agreements guaranteeing a minimum number of weekly hours, yet over an extended period were consistently paid for fewer hours than they were contracted for. At the same time, they faced threats of redundancy. These employees, and others working for this employer, continued to need assistance from the CAB over the next year and a half.

The treatment these employees experienced from their employer included being called in for performance review meetings and then, despite no issues being discussed at the meeting, receiving a written warning about conduct several days later. The employees came to understand this as a mechanism for the employer to terminate their employment despite the warnings being baseless. The employer also held work meetings in a hospitality establishment where the employer behaved inappropriately, including verbal abuse of staff and attributing business difficulties to employees.

Over time, the employer changed the employees' contract conditions, including telling the employees that they needed to use their own transport to reach customers and that these travel costs will not be covered. If the employees continued to use work vehicles, they would no longer be paid for the time taken to travel. As these employees are required to work across multiple rural locations, these changes have a significant negative impact on their income.

Most employees are seeking alternative employment while applying for Migrant Exploitation Protection Visas. They are continuing to work for this company, despite not being paid and receiving abuse, to keep to their side of the employment and immigration agreement. A few have resigned and need to return home, hoping (rather than expecting) to be paid for the hours they have worked before leaving the country. For those offered a job with another employer, the employees have not been able to accept this work because their Migrant Exploitation Protection Visas have not been approved in time. Others, who have options available to them, are pursuing alternative visa pathways to reduce dependence on a single employer.

Publicly, the business has attributed its financial difficulties to external economic pressures and unreasonable worker-related employment issues. The employer owns several other companies in a similar trade and in the same region.

Case Study 2: Healthcare Company

Over the course of a year, multiple clients who are employees of a care provider visited their local CAB for support due to experiencing poor treatment from their employer. Some came as a group and described the same employment issues, while others came individually to seek help with their own situations. The employees reported common issues which included being underpaid, having hours reduced, being bullied, receiving threats related to their visa status, being subjected to unfair disciplinary actions, and encountering barriers to getting help, including warnings not to join a union. The employees needed help to escalate the issues, using employment advocates and legal specialists, to move forward.

Each employee began processes such as applying for a MEPV and/or filing a personal grievance while also trying to find other work. Barriers they faced while trying to follow these processes included the following.

- Their MEPVs expired quickly, meaning some had to return to their home country before they could find new work or complete mediation. In some cases, employees had to leave New Zealand before being paid for work they had already done.
- Because they urgently needed money for everyday expenses, some employees continued working for, or returned to, the employer. This then made them ineligible for personal grievance compensation.
- For some employees, mediation was highly traumatic. During the process, the employer challenged their credibility and made allegations about their conduct at work without evidence. The employer was only willing to accept liability for underpaying staff. Although the employees' legal representatives believed they had a very strong case and could potentially receive a substantial settlement if the matter went to the Employment Court, the experience of being falsely accused during mediation left them too distressed to continue pursuing the process.

To address the issue of employees being underpaid, the CAB and employment advocate created a spreadsheet of the hours worked against the payslips employees had received. A payroll expert calculated total underpayments at almost \$60,000. This figure did include unpaid sick leave, overtime, and days in lieu, but, as only a number of employees were represented with only the payslips these employees had been given, the actual underpayment is likely to have been significantly higher. Other concerns about remuneration practices include employees receiving payments in their bank accounts that were not processed through the usual payroll system and did not appear in their myIR summaries. Payslips have not been provided for these payments. Employees who questioned their pay commonly reported being told that if they raised concerns about their hours their visa would be cancelled.

When the company decided the employees would no longer receive their contracted hours because of claimed financial stress, the employer called them to a meeting at a local hospitality venue. At the meeting, the employer blamed the company's financial difficulties on poor employee performance. The employer proposed that if a reduction in hours was an issue for the employees, they could request a transfer to another location within the franchise. However, the employees who expressed interest in transferring were not offered positions elsewhere. Employees were warned that, if Immigration New Zealand was contacted about their hours no longer matching their contracts, this would result in visa requirements not being met and their jobs being terminated. In effect, the employees were being told if they continued to work for the company, they would be agreeing to be paid for fewer hours of work.

During the employment resolution process, employee advocates noted the lack of written communication about the issue of minimum hours of contracted work. They questioned why, if the business was genuinely under financial stress, other options such as redundancy were not discussed through a proper process. There was obvious confusion among employees about what had been said at the meeting, as several later messaged the employer asking why they were no longer being paid for their contracted hours. The employer's replies consistently referred to poor performance.

The employer also made other system changes that appeared to disadvantage employees, including the following.

- Creating a very short window of time - during with the busiest part of the day - to enter their hours into the timesheet and payroll system. If hours were not entered during this period, the employee would not be paid.
- Reducing mileage payment rates or not offering work to employees that did not have their own vehicles.

Case Study 3: Transport Company

The employee works for a transport company but is paid by an employment agency, and their visa is tied to that agency. They came to the CAB for advice after being asked to sign an extensive 20-page form for a sister company of the agency that appears to be managing their visa. Because English is their second language, the employee wanted to be sure they understood what they are signing. The form shows the company managing the visa wants ready access to the employee's immigration records, even though the employee holds an appropriate working visa. The employee is being threatened with having their work visa revoked if they do not sign. They also have not been paid the night-driving allowance set out in their contract.

The CAB contacted INZ to ask about the situation. One INZ staff member insisted the employee's experience did not amount to migrant exploitation and suggested they speak to employment relations instead. The CAB then contacted an immigration adviser, who was immediately concerned that the employee may be experiencing exploitation. When the CAB called INZ again, a different helpline operator confirmed that the employee's experience did meet the description of migrant exploitation.

After the CAB asked the employment agencies questions about the purpose of the form and why the employee had not been fully paid overtime, the employee was called to an employment meeting instead of being given a shift for that day. The employee returned to the CAB as soon as they received notice of the meeting, knowing they would need a support person who could also help with translation.

In the meantime, further investigations by the immigration advisor discovered that, although the employee believed they were on a particular visa, INZ had mistakenly issued them a different visa type. The correct visa had been issued when the other visa expired and the mistake had been discovered, but it had not been correctly loaded onto the INZ website, explaining why the employment agency believed the employee might be working unlawfully. Unfortunately, INZ had not disclosed during those earlier calls that this mistake had already been identified. File notes showed that the helpline operators escalated the issue at that time so the correct current visa would appear for the employee, but that the fix could take up to five days. The CAB set out this information in a support letter, which helped the employee at the employment meeting. The employee was allowed to continue to work on the understanding that the visa would be loaded correctly within the week. The employee

was stressed that INZ would not fix the mistake in time and multiple calls to INZ had proved fruitless in getting any assurances. With help from the CAB, the employee approached the local MP's office, whose advocacy led to the correction being completed within a day.

Although the employee's immediate visa issue resulted from an INZ error, the intimidation and harassment by the employment agency, along with ongoing underpayment, continued to raise concerns that the employee was being exploited.

Case Study 4: Beauty and hair services company

Over the space of a few months, six face-to-face interviews and five and a half hours of volunteer time, the CAB supported a migrant worker through a difficult employment situation. The employee had not been in their job for long when the employer said that, because the company had no money, they would only be given work on days when clients made bookings specifically for them. However, the employer removed the employee from the booking section of the company website, making it impossible for clients to book their services. The employer is wanting to change the contract conditions of this employee by offering less work, even though the employee needs and was contracted for full-time work. The employee planned to raise the issue again with their employer, this time in writing by email.

The CAB gave the employee information from the Employment Relations Authority about the steps they could take if their concerns were not addressed after they had made their written complaint. After meeting with the employer, the employee returned to the CAB for help because they were struggling to get any of the proposed contract changes confirmed in writing. The employee needed confirmation that their employment contract was being terminated and that they would be paid for the termination period even if the employer could not provide work during that time. The employer was not providing proof of the financial stress that they claimed the business was facing and appeared to have decided on the outcome for the employee before any discussion was had, without considering a termination period or redundancy process. The employee also raised concerns regarding several other migrant employees who, in their view, also appear to be experiencing exploitation. Further concerns discussed included physical abuse by the employer towards members of the employer's family.

The employee returned to the CAB feeling overwhelmed, disrespected and panicked. They have become very concerned that the employer was reusing the employee's work documents for other staff by deleting the employee's name and replacing it with the names of new employees the employer is helping to bring to New Zealand from overseas. The employee has tried to relay these concerns to INZ. They also said the employer has been treating them disrespectfully by yelling at them, behaving manipulatively, and lying about matters affecting them. The employee is keeping a written record of all their interactions with their employer. The employee's doctor has diagnosed that the employee is suffering from stress.

Case Study 5: Retail Company

The migrant employee is on a 5-year work visa. At the time they sought help, the employee had worked twice as many hours as they were contracted for but had been paid for less than a third of those hours. The employee approached the employer to ask for payment for the remaining hours of work. The employee stated that they were not prepared to work until the employer paid for the work already completed. The manager may have interpreted this as the employee refusing to work and leaving the job. When the employee tried to correct this misunderstanding, the employer said they would contact their lawyer. Acting on advice, the employee sent a message to clarify their position, including these statements: *“I have sought advice on my situation and wish to clarify my position with you... I expect to be paid for the hours I have worked at the rate stated in my employment contract... Any suggestion that I am leaving the company voluntarily would be considered constructive dismissal.”*

After this message was sent, the employee was called to a meeting with the employer and again sought help from the CAB. The employee is concerned for their personal safety because their employer knew a great deal about them and had shown disregard for their wellbeing. For example, the accommodation provided under the employment contract lacked basic amenities. The CAB suggested that the employee take a support person to the meeting, but this was difficult because they were new to New Zealand and had not formed local connections yet.

The employee filed a complaint with the INZ Employment Migrant Exploitation section. With weeks passing since application, they only had enough money left to pay rent and are wondering how long the exploitation investigation will take. When they came to collect a food parcel, they mentioned experiencing tightness in their chest.

The employee has been feeling at a loss with no job and no income but has appreciated being able to access another food parcel. They have also been helped by the local Community Law Centre, where a lawyer confirmed that the employee’s English was of a satisfactory standard.

Once the exploitation investigation process was complete, the employee asked the CAB to help them understand the Report of exploitation assessment letter (RoEAL). From this, they learned that they now have a pathway to apply for a Migrant Exploitation Visa. The employee returned to the CAB for help with the MEPV application. They also had a document to sign from the employer about wages owed, but the employee is concerned the details were incorrect. The employee also needed another food parcel.

Following up with the CAB, the employee came to say they were happy to have found another job, they had transferred their Accredited Employer Work Visa and were seeing improvements in their health.

Case Study 6: Building and Other Industrial Services

Multiple migrant CAB clients have sought help after buying into a franchise company. They paid the franchise fees and successfully completed the online training with the understanding that the franchisor would guarantee a minimum income by referring job contracts for each franchisee to carry out. However, the franchisor did not meet the terms of the franchise agreements and failed to provide any jobs to enable the franchisees to earn income. The franchisor also did not cooperate when franchisees sought refunds or tried to cancel their franchise agreements. As a result, franchisees needed to apply to the Disputes or Small Claims Tribunal for compensation. The company's website refers to the Franchise Association of NZ (FANZ) and the franchisee contract outlines a disputes resolution process involving basic mediation through FANZ. However, when franchisees called FANZ for assistance, they were told that this franchise is not a member of the association and therefore they cannot facilitate any mediations for the franchisees. None of the franchisees had obtained legal advice before signing the Franchise agreement, largely because of the costs of getting a lawyer.

In some cases, the franchisor responded to the claims that no job contracts had been provided by saying that the franchisees had turned down jobs that were offered to them. However, examples of these situations included a job contract that was clearly already being carried out by another franchisee, and other occasions where multiple jobs were offered across locations so widely spread that it was physically impossible for one franchisee to travel between them and complete them all in a single day as required.

Exploited migrants often require high levels of support

As these case studies show, migrants experiencing exploitation often face complex situations that mean they require high levels of support. People are often enduring appalling treatment and situations in a place where they are unfamiliar with systems and processes. They have no support networks, no financial stability, difficulties with language, and they lack protection and support for finding a way out of the exploitative circumstances they are in. Migrants are often in situations of shared distress with others, and although this can create strength in seeking help, it is often the extraordinary bravery of one individual that can create opportunities for the group of affected workers to move out of exploitation.

People need ongoing support

Ongoing intervention and support from CAB interviewers is essential for positive outcomes for migrants experiencing exploitation as they make their way through the process of moving to healthy employment conditions. It is evident that migrants experiencing exploitation or those on a MEPV are living in hardship conditions with little resources available to them for basic needs. Migrants experiencing exploitation are usually not eligible for welfare support during investigations or visa application periods, despite often not being paid wages for the work they have done and/or being forced to leave their employment-related accommodation. This is also true for migrants whose visas are tied to companies that

have failed due to economic stress. The inability of immigration settings to quickly reflect the market creates difficult circumstances for migrants who depend on that work.

Community organisations are working to fill gaps in food, accommodation, healthcare, and advocacy for migrants who have been exploited. This support is often critical to migrants' ability to endure these situations and highlights the importance of the strong networks and connections CABs have within their communities, including local food banks, Community Law Centres, ethnic support groups, and immigration advisers.

Avenues of support are limited

However, avenues of support for exploited migrants remain limited. CAB enquiries show that some people return to exploitative situations because they have no resources to survive without work, while others return to their home countries without receiving justice or compensation for the treatment they experienced in Aotearoa New Zealand.

Many of these migrants also carry significant debt to people in their home countries, often resulting from fees charged for securing employment and visas to work in New Zealand.

Common experiences of exploited migrant workers

Common experiences illustrated in the migrant exploitation case studies include the following.

- Migrant workers experience stress and impacts on their mental health due to their treatment by employers, and long and difficult wait times when dealing with INZ, or Employment NZ processes.
- Migrant workers experience delays in the processing of exploitation claims and immigration matters, limited ability to find alternative work, barriers to accessing basic needs, and ongoing hardship.
- Visa status being used to intimidate employees into continuing to work under new and poorer standards.
- Mediation processes can cause further harm to migrants' health due to inappropriate behaviour and misuse of the process by employers, including making incorrect or baseless accusations about the employees.
- Employer/employee meetings where significant and impactful information is shared, being held in public spaces in hospitality establishments.
- The failure of a company being blamed on employees using unsubstantiated claims of employee poor performance.
- Allowances reduced or discontinued and conditions changed negatively impacting employees, such as paid mileage, without following correct process.
- People not knowing what options or support are available to them.
- People needing help with applying for exploitation protection visas.

Other common themes from migrant exploitation CAB enquiries

The case studies show us some common themes within situations where migrant workers have needed CAB support on multiple occasions with a variety of complex issues. We also see other themes not highlighted in these case studies. The CAB enquiry examples below have been chosen as they illustrate these common themes. These themes show where processes and systems are either exacerbating harm or are failing to prevent the harm that we see migrant workers experiencing.

Conditions attached to work visas are creating further vulnerabilities for migrants

Enquiry example

The employee paid for a New Zealand work visa while in their home country. Since arriving in Aotearoa New Zealand, the employer has not fulfilled the employment agreement and has failed to pay the employee for additional hours the employer has required them to work. The employer has also:

- required the employee to carry out unpaid domestic work for the employer
- demanded rent for accommodation that was included in the employment agreement
- prevented the employee from going out
- bullied the employee.

Since the employee has managed to leave the premises, the employer has said the employee will be trespassed if they attempt to return to collect their possessions. The employee wants to terminate this employment early, but their visa is tied to the employer. The employee heard that the employer is arranging for more employees to be brought in from their home country.

CAB enquiries show that the Accredited Employer Work Visa (AEWV), which ties a worker's visa to a specific employer, creates a significant barrier to leaving exploitative employment.

Other conditions of the AEWV are also causing harm, such as market rates being used to determine the wage rates for AEWV. Market Rates were introduced to align migrant wages with that of a New Zealand resident and remove the need to have sector agreements providing exemptions to paying the median wage. Previously, the number of migrants working in an industry and being paid below the median wage was capped within these sector agreements, but this no longer applies with the shift to using market rates.

CABs have observed that this change has caused the wage rate per hour to drop at a time when cost of living is increasing. This may reflect the high number of workers on a temporary work visa within industries. This shift impacts migrants looking for a pathway to residency because sector agreements still require migrants to be paid at least the median wage to be eligible for residency consideration.

The name of the Migrant Exploitation Protection Visa is also creating barriers. Migrants report that potential employers often ask them to explain their visa status, which can be re-traumatising and may discourage employers from offering work.

In addition, the limited duration of the MEPV creates further challenges, as many migrants are unable to secure new employment within the timeframe provided.

Harmful behaviour of intermediaries

Enquiry example

The migrant worker was found to have been exploited, and a new role was arranged for them through a labour hire firm. However, this company also appears to be exploiting the worker. The employee is required to work more than 55 hours per week, despite their contract specifying fewer than 40 hours per week. Their payslip is unclear and includes several deductions, including an unexplained 50% fee and travel costs. If the employee worked only their contracted hours at the contracted rate, their pay would appear to be at minimum wage. However, given the additional hours worked, the employee appears to be receiving very little compensation for this work they are doing on behalf of the labour hire firm.

Experiences of exploited migrant workers who come to CAB highlight the harmful impact of intermediaries acting unlawfully. These intermediaries may include some immigration advisers, managers, subcontractors, or others involved in arranging employment or migration pathways. We hear from people who have been unlawfully charged significant sums of money to secure a job (job premiums) or visas in Aotearoa New Zealand. This debt can create a power imbalance, giving an immigration adviser or other intermediary control over the worker, whether the intermediary is based in New Zealand, in the worker's country of origin, or both. We also see situations where managers act as intermediaries and interpreters between workers and employers. In some cases, these managers contribute to further exploitation by withholding wages, providing unsuitable or overcrowded accommodation, or imposing unlawful conditions that generate income and power for themselves. The triangular structure involving visa agents, large companies, and subcontractors can also create opportunities for exploitation, particularly where subcontractors control workers' day-to-day conditions while visa agents and companies continue to promise meaningful, paid employment.

Harmful industry / corporation collaborations impacting migrants

Enquiry example

When the employee arrived in New Zealand, the employer had already arranged for them to purchase an expensive vehicle on finance. The employee had not been asked whether they wanted this or told in advance that it would happen. The employee was driven to a car sale

yard in a nearby city, where they were given paperwork to sign. The company then began deducting loan repayments from the employee's wages. After a time, the company stopped providing the employee with their required contracted hours and soon stopped providing any work. The employer told the employee that responsibility for the vehicle finance was the employees. The employee is now receiving no work but remains responsible for the vehicle debt, while also still owing thousands of New Zealand dollars for the cost of obtaining a work visa through an immigration employment company in their home country.

Migrant exploitation also appears in other forms in CAB enquiries. One example is cases where clients accumulate significant debt through high-interest vehicle loans. These enquiries describe new arrivals being taken to specific car dealers, often framed as casual trips, and encouraged to sign pre-prepared finance agreements they do not fully understand.

With limited knowledge of living costs in New Zealand and often using English as a second language, migrants may only realise later the implications of these high-cost loans. In many cases, they were not told in advance that purchasing a vehicle would be expected of them, nor had they requested such purchases.

This form of exploitation, when seen in our enquiries, has highlighted the time and effort required to obtain justice for migrants. Providing support, collating information, and seeking pathways to justice for a group of migrants approaching a CAB for help, took over 100 hours of CAB interviewer time and Community Law involvement in one bureau.

The burden of proving exploitation is particularly high for migrants, many of whom have limited resources. However, the CAB's ability to identify patterns across individual cases involving the same companies has played an important role in supporting clients to access justice.

Actionable Insights

We are helping migrant workers with information, advice and support to navigate systems and processes after experiencing breaches of their rights, exploitation, or serious harm at the hands of employers and other parties involved in their employment in Aotearoa New Zealand. Our current immigration settings, legislation, and enforcement do not adequately protect the employment and human rights of migrant workers. To address breaches of migrants' rights by employers and others, the following actions are needed.

- Improving Immigration New Zealand (INZ) responsiveness and processing timelines. A dedicated phoneline for people experiencing exploitation or people who are on a Migrant Exploitation Protection Visa (MEPV), could result in more informed and correct advice and help being delivered by INZ.

- Removing employer-assisted restrictions from visas so migrants are not tied to a specific employer. This would reduce the power imbalance that enables exploitation. This will involve a review of the Accredited Employer Work Visa (AEWV) scheme.
- Providing migrants on a Migrant Exploitation Protection Visa (MEPV) with access to legal advice, advocacy, and basic living support, including food, housing, and financial assistance.
- Renaming the MEPV visa to something that attracts less negative judgement, such as the 'Open Temporary Work visa' or similar. This would stop negative judgement from future employers and protect migrant workers against vulnerability to further harm.
- Strengthening safe reporting mechanisms and protections against retaliation so migrants can report concerns with confidence.
- Extending Migrant Exploitation Protection Visas to a minimum of 12 months so exploitation can be investigated and migrants have time to secure new employment.
- Stronger enforcement of employment law so that all workers in Aotearoa New Zealand receive their basic rights, including wages, agreed and reasonable hours, leave entitlements, a safe working environment, and fair processes. This should include stronger implementation of legal protections, greater inspectorate capacity, and more meaningful consequences for misconduct.
- Ensuring high finance loans are not readily available to people on temporary visas to protect migrants from being pressured into expensive finance deals such as high interest loans for vehicles.
- Supporting the health and wellbeing of exploited migrants by providing access to funded mental health care, trusted support people, and safe workplaces and accommodation.
- Ensuring mediation processes are safe, neutral, transparent, and constructive so they do not cause further harm.
- Educating and supporting migrants, employers, and business owners to know their rights and obligations under New Zealand employment law, including how to report concerns and seek protection. Provide this information in migrants' own languages so it is accessible and clearly understood.
 - CAB is well placed to help provide this support as an independent, trusted organisation that informs people of their rights and responsibilities and includes language interpretation within the service.
- Increasing public awareness of the signs of human rights and employment rights breaches, and of the actions people can take in response.

As this report demonstrates, our CABs have local insight into the experiences of migrants who are being exploited and the industries and companies involved in this harmful behaviour. In recognition of this local, cultural, agency and employment knowledge, government agencies such as Immigration NZ and MBIE's Labour Inspectorate could consider strengthening their relationship with CABs by being engaged, more easily accessible, and responsive to the work that CABs are doing.

Conclusion

This report is based on two years of CAB enquiries between May 2024 and May 2026 which were identified as involving migrant exploitation. The 1,000 (approx.) enquiries show that migrant worker exploitation is a significant and underreported issue in Aotearoa New Zealand. The evidence in this report shows exploitation occurring across a range of industries, job roles, and regions, and affecting migrants from many different backgrounds. While people of different ages, ethnicities, and genders are impacted, the enquiries suggest that those seeking CAB help are more often aged between 25 and 50, disproportionately male, and frequently identify as Asian or Latin American compared with general enquiries.

The report also shows that migrant exploitation is experienced in a variety of ways. CAB enquiries describe underpayment, withheld wages, reduced or inconsistent hours, excessive work demands, poor or unsafe accommodation, threats, bullying, coercion linked to visa status, control of bank accounts and email addresses, unfair processes, and barriers to leaving harmful work.

The case studies illustrate the severe effects of these experiences: financial hardship, food insecurity, debt, stress, deteriorating health, fear, and prolonged uncertainty for migrants and their families. They also show how exploitation often occurs alongside a lack of personal support networks, limited familiarity with New Zealand systems, language barriers, and practical dependence on employers for income, housing, transport, and immigration-related processes.

The concerns and issues migrant workers bring to the CAB show that current immigration settings, employment protections, and support systems are not sufficient to prevent or respond effectively to exploitation. Tying work visas to a specific employer intensifies the power imbalance between employer and employee and creates conditions in which migrants are less able to question unlawful treatment or leave unsafe work.

Difficulties engaging with Immigration New Zealand—including complex processes, long wait times, incomplete, inconsistent, or conflicting information, and limited access to timely help—can further deepen vulnerability and delay protection.

CAB enquiries also show that exploited migrants often require sustained practical, legal, and emotional support, with community organisations frequently filling critical gaps in food, housing, advocacy, and navigation of employment and immigration systems. Eliminating migrant worker exploitation will require coordinated action: removing employee dependency on employers in visa settings, extending and renaming the Migrant Exploitation Protection Visa, strengthening enforcement of employment law, improving safe reporting pathways, ensuring access to living support and legal advice, and providing clear, accessible information for migrants and employers alike. This report shows that urgent system change is needed if Aotearoa New Zealand is to uphold the dignity, rights, and safety of all people working here.

Appendix

Citizens Advice Bureau (CAB)

Our service

Providing free, confidential, independent information

Citizens Advice Bureau (CAB) provides free, confidential, independent information and advice to anyone and has been serving communities around Aotearoa New Zealand since 1970. We help people know what their rights are and how to access the services they need. We are a values-driven organisation and aim to be welcoming, empathetic and non-judgmental, showing kindness and aroha, taking time to listen and provide the support people need. We are an independent community organisation whose service is delivered by more than 2,000 committed and trained volunteers.

We work for positive social change

The CAB works for positive social change. We use what we learn from our clients to speak out for law, policies and services that uphold people's rights and strengthen their wellbeing.

How clients can access the CAB

Clients access help from the CAB by:

- visiting their local CAB (no appointment needed, over 80 locations)
- phoning their local CAB or calling free on 0800 FOR CAB (0800 367 222)
- emailing the CAB
- chatting with the CAB online www.cab.org.nz
- browsing the CAB website for information about their rights
- searching our database of over 30,000 local community organisations and services.

Many CABs also provide other support and advocacy services

As well as providing a core service of information, advice and support, many CABs provide a range of other services and advocacy to meet community demand.

Our Kaupapa

Mauri Manaia is the kaupapa of our organisation which carries our commitment to honouring the life-force or essence of the Manaia. When the CAB service was first established in New Zealand it was considered important to reflect New Zealand's culture and

people, including recognition of Māori as tangata whenua. The Manaia was adopted in consultation with Ngāti Whātua o Ōrākei kaumātua and represents the CAB's commitment to Te Tiriti relationships.

The Manaia is a mythical bird-man creature commonly incorporated into the lintels of wharehau as a symbol of protection. The CAB Manaia was designed specifically for the CAB and is a taonga for our organisation. It has been with us for as long as the CAB has been in New Zealand. It is part of our logo, thus part of our identity, and represents our uniqueness as the CAB in New Zealand. It also gives us something to live up to – to work in the spirit of the Manaia, honouring its protective forces.

We aim to create a future where there are no barriers to:

- Māori participating in all aspects of the CAB,
- the CAB service reaching and being effective for all Māori who need it, and
- effective relationships with Māori organisations and communities at both local and national levels.