

From: Trevor Clarke <tclarke@actu.org.au>
Sent: Wednesday, 18 December 2019 12:13 PM
To: AMOD <AMOD@fwc.gov.au>
Subject: AM2014/286 - Supported Employment Services Award

We refer to the above matter.

The ACTU intends to participate in the conference scheduled on 20 December 2019 to discuss the proposed determination annexed to the decision and the future timetable.

We regret that in the time available we have been unable to develop a comprehensive submission in response to the proposed determination. Notwithstanding this, and subject to the outcome of the more fundamental issues raised in the submissions of the AED Legal Centre, we can contribute to discussion concerning the following matters at the conference as scheduled:

- Whether it is appropriate that formal qualifications form a mandatory criterion for classification at Grades 4 and above as presently proposed, where this is not a requirement of the existing classification structure;
- Whether the absence of any indicative tasks for Grades 1-7 is sufficiently transparent to permit classification;
- Whether there is the possibility of divergent classification of employees above and below Grade 1 for performing the same work, having regard to the principal purpose of their employment and the highest functions of their position which are performed on a regular basis; and
- Whether the wage rates proposed for levels A and B are appropriate having regard to the rates for repetitive or process work set elsewhere in the award system.

Whilst we anticipate that the timetable for any trial of the proposed wages structure will require some revision as a result of the conference or future conferences, we consider that the proposed amendments to the superannuation clause and the proposed "Rights at Work" clause can and should commence independently as scheduled in the proposed determination annexed to the decision.

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Regards,

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Please note that I do not work on Tuesdays.