



**KOOMARRI**

*Supporting people with disability.*

Fair Work Commission  
Supported Employment Services Award 2010  
Matter No: AM2014/286

**21 November 2017**

Dear Associate

**We are opposed to the variation of the Supported Employment Services Award lodged by AED Legal that seeks the removal of all wage assessment tools.**

### **Introduction**

Koomarri has been providing disability services, including employment for people with intellectual disabilities for over 60 years in the Australian Capital Territory and Southern New South Wales regions.

Koomarri's ADE currently employs 101 supported employees and provides work opportunities in various business operations, namely grounds and garden maintenance, cloth cutting, commercial cleaning and administration support. The types of job tasks vary from basic single-range tasks to complex, multi-range tasks in administration, cleaning and garden maintenance work.

Koomarri currently utilises its own wage assessment tool known as the Koomarri Competency Based Wages System. The tool was established in 2001 under the then certified agreement with AMWU, certified by the Australian Industrial Relations Commission in 2002 and was later adapted for inclusion in the Supporting Employment Services Modern Award following a proper process for its inclusion at that time.

### **Koomarri's position on Wage Assessment Tools**

Koomarri supports the position that wage assessment tools that have a competency / skills based element remain in the Supported Employment Service Award and that the Modified Supported Wages System not be the sole mandated option for wage assessments in the Supported Employment Services Award for the following reasons:

- Koomarri supports the position of assessing wages in a fair and equitable manner, and that of ensuring that supported employees performing a variety of more complex tasks, even if less productive as a result, are not paid less than their colleagues who perform one aspect of a job resulting in higher productivity.
- Employment in a non-ADE or commercial environment includes the assessment of an individual's capacity to work based on skills and competence, we do not believe this should be different for supported employees.
- Koomarri's goal is to not only provide meaningful employment to individuals with disabilities, but also to teach new and enhanced skills so that supported employees can progress and achieve better outcomes in their employment.
- If the Modified SWS is the only option to assess wages, it may result in higher wage outcomes, which could affect the viability of our ADE operation to the extent that we may have to cease operation of the ADE resulting in a loss of jobs of many of our disability support workers and all of our supported employees.
- Such an outcome would also have a negative financial impact on the rest of our disability support operation as all of Koomarri's operations, especially the ADE, currently operate in a financial model with a low cost margin due to the NDIS price set market.

Koomarri also supports the Australian Business Industrial and NSW Business Chamber in their submission (31 July 2017) of the Work Value Classification tool to be included in the Supported Employment Services Award.

We ask that the Fair Work Commission allow the continued use of competency/skills based wage assessment tools in the Supported Employment Services Award, as well as the inclusion of the Work Value classification tool submitted by Australian Business Industrial. We do not oppose the inclusion of the Modified Supported Wages System; however, we oppose the notion that this be the sole mandated option for wage assessment available to ADE's.



Nadine Stephen  
**Chief Executive Officer**