



NSW ACT Independent Education Union

IEUA (NSW/ACT Branch)
GPO Box 116
SYDNEY NSW 2001
The Briscoe Building
485-501 Wattle Street
ULTIMO NSW 2007

Associate to Vice President Hatcher
Fair Work Commission

Dear Associate,

Re: C2103/6333- Application by IEU for an Equal Remuneration Order

The IEU wishes to file evidence and an outline of submissions in accordance with the directions issued on 13 September 2017. The evidentiary material is comprised of the 20 statements, and 9 bundles of documents marked IEU Bundle A to IEU Bundle I.

Given the amount of material sought to be filed the IEU seeks to file the evidence by digital means, by way of USB drives. Three copies have of the material have been created on three separate USB drives. Please find the USB drives enclosed. The evidence is on the USB drives is as follows:

STATEMENTS:

Early childhood teachers:

1. [Amanda Sri Hilaire, Kamalei Children's Centre, Bowral New South Wales.](#)
2. [Emma Cullen, director, Abbotsford Long Day Care Centre, Sydney New South Wales.](#)
3. [Emily Vane-Tempest, teacher, Sandcastles Childcare Chatswood Sydney New South Wales.](#)
4. [Lauren Hill, teacher, Catholic Early Learning Centre, Sydney New South Wales.](#)
5. [Lily Ames, teacher, City of Yarra, Melbourne Victoria.](#)
6. [Gabrielle Connell, teacher, Albury Preschool Incorporated, Albury New South Wales.](#)

Primary school teachers:

7. [Anthony Atkinson, teacher, Merri Creek Primary School, Melbourne Victoria.](#)
8. [James Jenkins-Flint, former teacher, St Brigid's Primary School, Sydney Australia.](#)

9. [Luke Donnelly, teacher, St Joseph's O'Connor, Canberra Australian Capital Territory.](#)

Professional engineers:

10. [Brad Broughton, Project Engineer, York Civil Ptd Ltd, Adelaide South Australia,](#)
5 years of experience.
11. [Thomas Haines-Sutherland, Civil Design Engineer, Mornington Peninsula Shire,](#)
[Rosebud Victoria,](#)5 years of experience.
12. [Kenan Toker, Graduate Software Engineer, Langdale Consultants Pty Ltd,](#)
[Sydney New South Wales,](#)graduate engineer.

Experts evidence:

13. [Carol Matthews, Assistant Secretary, Independent Education Union of Australia - NSW Branch.](#)
14. [Lisa James, Early Childhood Organiser, Independent Education Union of Australia - NSW Branch.](#)
15. [John Wesley Spriggs, an Industrial Officer with the Independent Education Union of Australia - Queensland Branch.](#)
16. [Martel Menz, Vice President - Early Childhood at the Australian Education Union- Victorian Branch.](#)
17. [Sue Dockett, Professor, Early Childhood Education, School of Education, Charles Sturt University \(Albury Campus\).](#)
18. [Susan Irvine, Associate Professor, School of Early Childhood, Faculty of Education, Queensland University of Technology.](#)
19. [Fran Press, Professor in Early Childhood Education, at the School of Teacher Education, Charles Sturt University, Bathurst.](#)
20. [Leanne Issko from Mercer provides a report that discusses the comparability of early childhood teachers with engineers in terms of work value and remuneration.](#)

BUNDLES:

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Yours sincerely,



Michael Wright
Industrial Officer