

From: Chambers - Ross J <Chambers.Ross.j@fwc.gov.au>
Sent: Wednesday, 25 August 2021 4:14 PM
To: Michael Robson <mrobson@asu.asn.au>
Cc: Sam Fary <sfary@asu.asn.au>
Subject: RE: AM2018/26 – SCHDS Award

Good afternoon Mr Robson

I confirm that you may file your submission by 9am tomorrow.

Kind regards,
Mirella Franceschini
Associate to The Hon. Justice IJK Ross
President

Fair Work Commission
11 Exhibition Street, Melbourne Victoria 3000
GPO Box 1994, Melbourne Victoria 3001

From: Michael Robson <mrobson@asu.asn.au>
Sent: Wednesday, 25 August 2021 3:43 PM
To: Chambers - Ross J <Chambers.Ross.j@fwc.gov.au>
Cc: Sam Fary <sfary@asu.asn.au>
Subject: AM2018/26 – SCHDS Award

Dear Associate,

AM2018/26 – SCHDS Award

I refer to the matter above and the directions to file further submissions in the matter by 4.00 pm today. The ASU has endeavoured to have its submissions and evidence ready in accordance with the Commission's directions, but we will not be in a position to do so. We respectfully request leave to file out of time, but no later than 9.00 am tomorrow morning.

We are unable to comply with the Directions, due to unforeseen events over the past weeks:

- Firstly, at different times over the past month all Australian domestic airlines have stood down a significant proportion of their workforce. The ASU's national industrial team has been occupied with an unusual number of consultation meetings and other activity to support our members in the Airline Industry.
- Secondly, the NSW Government has implemented public health orders that place strict rules around the work of our members in disability and mental health. This includes limitations on their ability to leave the 12 Local Government Areas of Concern and a required to have receive at least one dose of a COVID-19 vaccine before 31 August. NSW is a significant areas of membership for the ASU in the SCHDS industry. Responding to these challenges has occupied a significant proportion of the ASU NSW Branch's resources, limiting their ability to participate in the preparation of our case and provide instructions.

We apologise for making this request so late in the day. We had hoped to be in a position to comply with the directions.

Regards,

Michael Robson
National Industrial Co-ordinator
Australian Services Union - National Office
Level 8, 321 Pitt Street
Sydney, NSW 2000
Mobile 0428 447 114
Direct E-mail mrobson@asu.asn.au
www.asu.asn.au