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Sent: Tuesday, 3 September 2019 12:33 PM

To: Chambers - Hatcher VP

Cc: Sophie Margaret Whish ; Nicola Shaw ; Paula Thomson ; david.ireland@ags.gov.au ; Simon Spence ; Carol Matthews; Arthur Dowdle; Renee Mooney

Subject: 2013/6333 & AM2018/9 " Equal Remuneration Order / Application to Vary Modern Award - Revised documents

Dear Associate,

Re.: 2013/6333 & AM2018/9 – Equal Remuneration Order / Application to Vary Modern Award - Revised documents

Please find attached the following documents for filing:

1) An revised Annexure A (ERO Draft Order) to the Form F1 filed on 27 September 2017 [19.09.03 Amended ERO order.pdf]

2) A revised Form F46 Application to vary a modern award (original dated 17 August 2018) [19.09.03 Revised f46 signed - IEU.pdf]

3) An revised Schedule A to the IEU Submissions in Reply (s158) dated 3 may 2019 [19.09.03 Amended Schedule A to IEU reply submissions 3 may 19.pdf]

19.09.03 Revised f46 signed - IEU.pdf

The revisions reflect changes in the rates of pay contained in the *Educational Services (Teaching) Award 2010* and other relevant industrial instruments.

The parties to this matter are copied into this email by way of service.

Regards,

Michael Wright

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**IN THE FAIR WORK COMMISSION
AT SYDNEY**

MATTER: AM2018/9

**INDEPENDENT EDUCATION UNION OF AUSTRALIA
APPLICANT**

s.158 APPLICATION RE EDUCATIONAL SERVICES (TEACHERS) AWARD 2010

IEU SUBMISSIONS IN REPLY

Introduction

1. The first thing to note is that in respect of the vast majority of teachers, being those at primary or secondary school, no employers have filed submissions opposing the application or the increases sought, or have put in issue the IEU's case that there have been significant changes in work value since the rates underpinning the current rates were set in 1995.
2. In particular, there is no evidentiary or other challenge¹ to the IEU's contention that the work value of teachers in primary and secondary schools has increased since the rates which form the basis of the modern award were last reviewed in 1995, and again since the Award was made in 2010. Nor is there any objection to the claim in this regard.
3. This is unsurprising, noting that the NSW Industrial Relations Commission determined that teachers in that State had significant changes in work value in the relevant period, discussed below (reviewed in 2004 for primary and secondary teachers and 2009 for pre-school teachers). Nor has any attempt been made by ACA or AFEI to contend that such findings were not open, nor that the changes in question were in some way unique to NSW or otherwise inapplicable in respect of teachers generally.

¹ Aside from one throwaway line at [6](a) of the ACA's submissions.

4. Although the Commission must be satisfied that the variation is necessary and justified on work value grounds before it may be made, the absence of any argument to the contrary is a strong indicator that it is.
5. Two bodies have filed material in response to the IEU's s.157 application:
 - a. the Australian Childcare Alliance (**ACA**), representing privately-owned and operated early childhood care and education services (**ECEC services**); and
 - b. the Australian Federation of Employers and Industries (**AFEI**).
6. ACA's submissions, unsurprisingly, focus on the work of teachers working in ECEC services. The AFEI submissions are cast at a higher level, and are predominately concerned with award relativity questions. It is unclear who the AFEI purport to represent, or the basis for their continued participation in the proceedings.
7. Neither set of submissions acknowledge that the rates being sought would lift the minimum rates to a level *below* that which almost all primary and secondary school teachers are currently actually paid.
8. To the extent that the ACA urges a different result for teachers working in ECEC services, even if the Commission was inclined to, effectively on its own initiative, make a variation of this sort, this would require a conclusion that the work value of these teachers is less than their peers in primary and secondary schools. There is no rational basis on which this can be said to be so. The ACA does not suggest there is such a basis.
9. Two further matters of overarching significance that arise from the employer material filed is worth noting from the outset. **First**, neither the ACA nor the AFEI attempt to gainsay the fact that there is a shortage of ECTs in the ECEC services industry and a high turnover. The ACA evidence confirms that the significant pay disparity between ECT wages and the wages paid to primary school teachers (who usually have identical qualifications) is creating significant problems of attraction and retention of ECTs. Indeed

G8, one of the largest employers of ECTs in the country has recently increased ECT wages to try to address these attraction and retention issues.² The urgent need to address the shortage of teachers caused by the wage gap is a strong discretionary consideration in favour of granting the application.

10. **Second**, only two witnesses put on evidence as to the claim being unaffordable (by way of assertion only). [REDACTED]

[REDACTED]

The ACA material

ACA's evidence

11. The ACA has filed five additional witness statements in support of its objection to the IEU's claim:

- a. [REDACTED]
- b. Karthika Viknarasah;
- c. Alexandra Hands;
- d. Jae Dean Fraser; and
- e. Jennifer Kearney,

and in addition relies on part of Merrin Toth's statement filed in the ERO proceedings. [REDACTED] all are operators of small ECEC services. Each give evidence based on their personal experience in the industry. There is no attempt to address the IEU's expert evidence.

12. None of the six witnesses have provided the kind of detailed analysis of the work their employed teachers actually perform or financial analysis that

[REDACTED]

would be needed to support their general statements that teachers' work has not changed or that the claim is somehow financially unsustainable.

13. Notably, no witness provides any substantive challenge to the IEU witnesses' claim that it is often the teachers who are appointed to the director and educational leader roles. Nor is any actual data – which would be within the particular control of these witnesses – provided about increases in special needs children or other demographic changes.
14. Instead the evidence goes no higher than a series broad and bald assertions. To a large degree it misses the point. For example, there is a consistent tendency across the witnesses to give evidence of their views of the relative skills of *specific individuals* employed as teachers and educators in their centers. In respect of what little is said about the nature of work, no witness deals with the actual time period that the IEU's claim relates to: at best, they say that they have not noticed any change (whatever that means to them) since the introduction of the National Law in 2010.
15. The other recurring feature of the evidence [REDACTED] [REDACTED] is an apparent view that teachers have, and use, no greater skill than certificate-qualified educators and by implication have no higher work value. This contention:
 - a. again is put no higher than general assertion, with no evidence that these are matters these witnesses are particularly qualified to assess (or, indeed, how this assessment is being made);
 - b. sits oddly with the legal requirement for teachers to be degree qualified, and in most states meet registration requirements including by demonstrating competencies and to engage in continuous professional development;
 - c. is equally difficult to reconcile with legal requirements to have a minimum number of teachers present in addition to educators, which manifestly reflects the view that these workers have different and necessary skills; and

d. may more accurately reflect a pervasive undervaluation of the work performed by teachers generally and in ECEC services particularly.

16. It is notable that this apparent view is not said to manifest itself in any of the witnesses' companies deciding to pay educators the same as teachers.

17. The ACA evidence, such as it is, should be given little if any weight.

18. It is important to note what is **not** put in contest by the ACA evidence. First, as noted above, there is no evidence that denies that there is a shortage of ECTs caused by the significant wage imbalance between ECTs and primary school teachers. [REDACTED]

[REDACTED]

[REDACTED]

19. [REDACTED] This is a matter of public interest: it affects both the general supply of childcare services and the quality of the care that can be provided (with high turnover having the potential to compromise quality of care).⁵ In large part it is a product of the relatively low wages teachers in ECEC services are paid in comparison to their predominantly non-award dependent colleagues in primary and secondary schools. The need to address the negative consequences on employees and children of

⁵ That some ECTs take a place only until they are able to secure a job in a primary school setting is implicitly acknowledged by Ms Viknarah: Statement at [25].

shortages of skilled staff is a proper discretionary consideration in evaluating whether an increase is appropriate;⁶ in these circumstances it is one which, in this matter, weighs in favour of the claim being granted. Notably, it is a matter about which the ACA are entirely silent.

20. Nor, as noted, is there evidence beyond broad assertion that the claim is unaffordable in full or in part or will necessarily lead to increases to child care fees or otherwise jeopardise the viability of for-profit services.
21. Further, none of the evidence deals in any serious way with:
 - a. changes in pedagogical understandings and practices, and the impact this has had on the complexity of teachers' work; and
 - b. changing demographics (aside from special needs students, discussed below) of students and families, and the corresponding change in the nature of the work.
22. As to the areas where the IEU has filed evidence demonstrating there has been work value change, the evidence in response is limited and unconvincing.

Regulatory and qualification changes

23. The extensive evidence led by the IEU as to the significant and multi-faceted changes to degree qualification requirements, regulation, standards and curriculum, and the resultant additional obligations that fall on teachers including to prepare lesson plans to meet the curriculum, meet ongoing professional development requirements to satisfy registration obligations, and to prepare complex day-to-day reports, are all said to be changes of no consequence on the basis that the 'core role' of teaching of young children is unchanged. It would appear that the witnesses assert, in effect, that all those changes can be considered no more than red tape entirely

⁶ See, e.g. *Public Hospital Nurses (No 1)* (2002) 118 IR 336 at [18]; *Public Hospital Nurses (No 3)* (2003) 121 IR 28 at [88]-[90], [160]

unconnected with any increased standard of teaching. Such assertions would not be accepted.

Technology

24. The skills now required by extensive integration of technology are dismissed by the ACA witnesses on the basis they make work 'easier'. When examined, such a contention in truth is a contention that the use of technology means work can be done more efficiently and quickly, resulting in greater productivity. For example, instead of hand-writing or typing reports, taking photos and sticking them in folders teachers use apps to take photos and write material on a tablet and then upload that so it can be viewed by parents. This greater productivity arises due to the use of new higher level skills and gives rise to increased responsibilities, including those involved in online publication.
25. The suggestion that the use of programs such as ELLA (per Viknarasah at [47]) involves no more than handing a child a wifi-connected iPad, which is 'easier' than actually teaching them language skills, is inherently unlikely.
26. Rather, changes such as those involve new teaching and supervisory tasks. It is not as if teachers no longer use hand-writing and typing skills. In order to achieve higher productivity and better outcomes teachers use additional skills which create higher value work.

Staff-student ratios

27. Similarly, the introduction of lower student-staff ratios does not lower work value, as apparently claimed by the ACA. Rather, it reflects the complexity of the work performed by teachers in ECEC services, particularly the need to provide individual learning plans following the introduction of the NQF and Early Years Learning Framework. Working with fewer children permits greater learning achievements, but requires no lesser teaching skills.

Submissions

28. The summary of principle set out at [8]-[9] accords, in the main, with the approach set out in the IEU's primary submissions, subject to two minor matters.
29. **First**, at [9](b), it is asserted that the Commission '*traditionally*' only approved relativities in a particular award if satisfied that these were externally consistent. This is unsourced, and elevates the desirability of consistency across the award system too high. The application of such a notion to deny an increase that is otherwise justified would be an error. The central question remains the actual value of the work and the obligation to ensure that the Award wages provide a fair minimum safety net, including with regard to the value of the work (comparative or otherwise). This application does not turn on the rates applicable to other professionals under other Awards (particularly given that there is no reason to consider those rates properly set or currently properly reflective of the work value of that work). The Commission needs to consider the actual work value of the teachers in question, and then consider whether the current wage rates in the Award adequately and fairly compensate for this. In any event, as noted in the Pharmacists Decision at [152], work value change may well justify an adjustment to relativities.
30. The concern with external relativities is one that arose in earlier times when awards set actual rates such that an adjustment to rates could have actual flow on implications. If teacher rates were increased to the amounts sought by the application (ie to rates *below* what teachers at primary and secondary schools are *actually* paid), there is no prospect it would create a precedent that would lead to other professionals (such as nurses or academics) obtaining increases in their actual rates of pay.
31. **Second**, at [9](c), it is asserted that professionals are required to '*keep...abreast of changes and developments*'. So much can be accepted, but that assertion elides the fact that in adapting to more frequent and/or complex changes in work practices professionals can and do obtain additional skills and can be required to work at a higher level in both cases, amounting to an increase in work value.

32. The technological change in teaching (and in white-collar industries generally) that has occurred between 1995 and today goes beyond merely keeping up to date with the latest thinking in an area; it is instead a complete revolution in the manner and place in which work is performed and the nature of the tasks. The changes described in the IEU's evidence in fact involve wholesale change in the nature and manner of work performed, and have significantly increased the skill level required and work product value of teachers since 1996.
33. The ACA's submissions in respect of the National Law and Regulations misunderstands both the IEU's case in this respect and the *actual* impact of these matters on teachers in ECEC services. The introduction of the National Law is one of a number of factors said to have increased the work value of teachers in ECEC services, not the principal reason for the claim – so much is obvious when it is considered that, insofar as change is alleged, the IEU's material refers to changes since 1996, 14 years before the introduction of the National Law.
34. In any event, the ACA's submission that the National Law has not caused an increase in work value substantially rests on the claim that teachers are not *necessarily* tasked with the roles with direct responsibilities under the National Law. This is misplaced as:
- a. the National Law affects the work of all persons working in ECEC services;
 - b. teachers are, as a matter of fact, often appointed to the specific roles identified by the National Law;
 - c. the ACA's own evidence shows that teachers' more '*developed*' skills lead to them being in practice at a minimum asked to assist with tasks required by the National Law;⁷

⁷ See, e.g. Statement of Viknarasah, at [29].

- d. in any event, the fact that the National Law could lead to additional tasks being required of certificate-qualified educators simply means that their work value may also have increased.
35. The ACA spends some time, at [31]-[40], complaining that the IEU's evidence includes statements of opinion and does not '*comprehensibl[y]*' describe the work done by teachers. These complaints are focused on form.
36. Leaving aside the ACA's dire need to cast the beam out of its own eye before embarking on this kind of exercise, its criticisms of the evidence are baseless. The IEU's lay witnesses provide detailed examples of the day-to-day work they perform; its experts (noting the ACA has not filed any expert evidence) provide a detailed higher-level analysis. There is a more than sufficient basis for the Commission to conclude that the work value of teachers, including teachers in ECEC services, has substantially increased since both 1996 and 2010.
37. To the extent that the ACA submissions at [41]-[97] deal with the current work value of teachers, these submissions are in large part addressed by the IEU's preliminary submissions. The contentions as to the effect of additional regulation are dealt with above. In addition, two minor matters emerge.
38. **First**, the argument at [51]-[52] that the increased integration of technology has somehow reduced the work value of teachers focuses on efficiency rather than skill. Simply because something can be done with greater productivity more quickly does not mean it is *easier* or requires lower skill. Instead, as the IEU's evidence shows, the increased use in technology has correspondingly increased the skill level required of teachers, their productivity and output, and thus their work value.
39. **Second**, at [71]-[72] the ACA reiterates its misplaced reliance on the relative ATAR of a teaching degree at the University of Sydney as opposed to an engineering degree. The ACA claims at [72] that the ATAR is '*affected by factors such as demand*': in fact, ATAR cutoffs are *entirely* a measure of

student demand. Nothing can be gleaned about the quality or rigour of the qualification from this measure.

40. **Finally**, to the extent that the ACA throughout this portion of its submissions refer to an alleged absence of evidence, this:
 - a. ignores, or mischaracterises, the detailed and voluminous lay and expert evidence filed by the IEU in support of its claim; and
 - b. brings into sharper light the significance of the ACA witnesses' failure to lead proper evidence of relevant matters within their knowledge and control to disprove the matters set out in the IEU's evidence.
41. At [109]-[119], the ACA's submissions address the relativities questions. These submissions are based on a table of calculations set out at 109.
42. These calculations use the level 1 rate as the starting point and the internal 100% relativity point. The ACA is correct that this is defined as the 'standard' rate; however, aside from being used to calculate certain allowances, this does not have any relevance to any person who is or will be employed as a teacher. Per cl.13.4(b), a four-year degree qualified teacher – i.e. the standard graduate role - starts at level 3. This is accordingly the correct 100% internal relativity rate, as set out in the IEU's application and submissions. The table, and every submission that flows from it, is fundamentally affected by this flaw.
43. To the extent that the ACA object to the claim on the basis that it would increase minimum wages of teachers to rates which exceed the current minimum award rates for other professionals, the following must be said:
 - a. this is not a case about the rates that ought to apply for professionals under other awards; this case must be judged on its merits which involves analysing whether there has in fact been significant change in the work value of teachers such that the current rates are clearly inadequate. On the ACA's approach no award affecting professionals can be changed unless they are all changed. Such a proposition

leads the Commission into error. It must address the case before it. It cannot reject it because it does not have other awards before it as well;

- b. there is no evidentiary support for the apparent claim that a teacher working in an ECEC service with more than eight years experience should properly be paid less than the other roles referred to, and this cannot sensibly be simply assumed (without buying into gendered prejudice about the value of work of this kind);
 - c. the ACA do not, and cannot, submit that those rates are in any event properly set;
 - d. the industries referred to – medicine, academia and nursing – are those that are characterised by extraordinarily low levels of award reliance, which tends to explain why they have not been the subject of work value review, which in turn belies the notion that the rates set in those awards are to be considered appropriate benchmarks; and
 - e. the industries referred to are not affected by the issue that arises in teaching – where shortage and turnover is created as a result of one subset of teachers (in ECEC services) being paid approximately 30% to 50% less than all other equivalent trained and experienced teachers.
44. If the ACA can find an '*internationally recognized academic*' or one of the '*most senior doctors*' who is actually paid anything close to the minimum award rates (being \$91,448⁸ and \$89,672⁹ respectively) this submission might have some force. As it stands, it does not.
45. The submission is, in effect, a contention that the IEU's claim will disrupt proper external award relativities. The difficulty with this submission is that the rationale behind maintaining these relativities assumes that rates are properly set to begin with, and that the relativities are correct. This is

⁸ Higher Education (Academic Staff) Award 2010, cl.18.1

⁹ Medical Practitioners Award 2010, cl.14.6

particularly so given that there has been no systemic review of internal and external award relativities, and the C10 scale generally, since 1990.¹⁰ Calls from employer organisations for such a review to occur across the modern award system¹¹ have met with heavy resistance from other employer organisations.¹²

46. Finally, the ‘discretionary considerations’ raised by the ACA at [120]-[125] (i.e. the effect on childcare costs and centres’ capacity to pay), are unconvincing as:
- a. they fail to note that the practical impact is limited to the ECEC services industry, and not the whole industry;
 - b. they fail to identify that within those parts of the ECEC industry that do not currently already pay the same rates as primary school teachers, the increases would affect only the minority of employees of centers, namely those who are teachers;
 - c. they overlook the positive impact the changes would have in addressing issues of shortage and turnover;
 - d. they do not take into account increases in government funding available in the ECEC industry;
 - e. there is no defensible policy reason for the problems associated with childcare costs, particularly for women, to be solved by the continued underpayment of (overwhelmingly female) teachers working in ECEC services, if their work value would otherwise justify an increase.

AFEI

47. A significant defect in AFEI’s analysis arises from its reliance on Mr Egan’s report filed in the ERO proceedings. This report provides a job size evaluation, which although critical in its conclusions corroborates the similar

¹⁰ See Print J2043.

¹¹ See, e.g., Submission by the Australian Catholic Bishops Conference to the 2018-2019 Annual Wage Review, at [105], [124]-[127].

¹² See, e.g. Submission by Australian Industry Group to the 2018-2019 Annual Wage Review at 7.2

analysis performed by Ms Issko. The submission appears to proceed on the notion that 'job size', determined in accordance with a specific methodology, is the same as 'work value' as that expression is understood by the FW Act. From that misguided equivalence it then assumes that current award rates of pay for professional engineers are both properly set and appropriate, and so reaches the conclusion that teachers, which have no higher 'job size', have appropriate award wage rates. Given the erroneous underpinning of the analysis it is of no assistance to the Commission.

48. The AFEI submissions are not otherwise supported by any evidence. To the extent that they take issue with the IEU's evidentiary material, these contentions should be treated with caution given that the AFEI puts on no evidence to contest the IEU material. Nor is it apparent that its non-evidence backed assertions are based on any expertise or experience in representing employers in the industry, noting that the AFEI has to date failed to identify a single employer or category of employers that it is purporting to represent.
49. At [50]-[84], AFEI contends that no regard should be had to the rates in the various NSW awards, as:
 - a. the rates contained therein were 'fair and reasonable' award rates rather than 'fair minimum' award rates;
 - b. teachers in NSW are employed under different statutory conditions than federal system employees; and
 - c. the rates may contain non-work-value related components, and the IEU has not established that the rates were the subject of a proper work value analysis.
50. As to the first, it is a distinction without a difference. The awards referred to by the IEU set the minimum rates for teachers in NSW. The addition of the word 'reasonable' does not alter the statutory exercise in a relevant way. Does the AFEI contend that the Fair Work Act permits (or requires) the Commission to set rates of pay that are unreasonable?

51. As to the second, it would appear the reference to different statutory conditions is a reference to the fact that teachers in question in NSW were employed pursuant to State legislation, granting them employment on particular terms, including for example obligations to take work in regional areas. There is no evidence to suggest that this is in fact unique; in any event the AFEI does not identify why such statutory provisions would result in teachers in NSW being rationally considered to have different and higher work value than teachers in other States. It is inconsistent with the approach taken in New South Wales; as set out in some detail in the IEU's primary submissions at [51], teachers in independent schools were awarded similar work value increases in 2004 to their government-employed peers.¹³
52. In any event, the second contention misses the point. The IEU's submission is not that the federal award rates should be increased to exactly match the NSW award rates with subsequent increases. Instead, the point is that:
- a. teaching work is teaching work, wheresoever and for whoever performed (a contention not challenged by AFEI);
 - b. the degree of difference between the NSW rates and the modern award rates is a strong indicator that the Award rates were not properly set and are significantly lower than they ought to be; and
 - c. the recognised increases in work value in NSW in the relevant period have not been taken into account in adjusting the federal rates.
53. As to the latter two points, that is so given the exhaustive work value evaluation undertaken in NSW on at least three occasions in respect of these roles, as set out in the IEU's primary submissions. Contrary to AFEI's contentions, both a significant increase in actual work value, and the corresponding component in the new wage rates attributable to work value

¹³ *Teachers (Archdiocese of Sydney and Dioceses of Broken Bay and Parramatta) (State) Award 2004 and other awards* [2004] NSWIRComm 159; *Crown Employees (Teachers in Schools and Related TAFE employees) Salaries and Conditions Award* [2004] NSWIRComm 144.

– i.e. the percentage increases awarded – were identified. By way of illustration:

- a. in the 1980 Case,¹⁴ a total increase of 6.8% was awarded on the basis of increases in work value since 1974;
 - b. in the 1991 Case,¹⁵ a total increase of between 20% to 23% was awarded in part in recognition of work value increases since 1980; and
 - c. in the 2004 Case,¹⁶ a total increase of 12% was awarded in respect of increases in work value since 1991.
54. Similar increases were awarded to pre-school teachers, as set out at [52] of the IEU's primary submissions. Contrary to the AFEI's suggestion at [57]-[59], and as set out in the IEU's submissions of 26 July 2018 (in response to a similar assertion in the ERO matter), this involved a direct comparison between the rates for teachers in primary and secondary schools with those paid to the teachers in ECEC services.
55. To the extent that AFEI's submissions thereafter deal with the external relativities issue, the IEU relies on its submissions above, including at [29].

Legislative change since the claim was brought

56. On 12 December 2018, amendments to the *FW Act* effected by the *Fair Work Amendment (Repeal of 4 Yearly Reviews and Other Measures) Act 2018* (Cth) came into operation. Relevantly, these included the variation of 157(2)(a) to read:

'making the determination outside the system of annual wage reviews and the system of 4 yearly reviews of modern awards is necessary to achieve the modern awards objective'

¹⁴ *Re Crown Employees (Teachers Award)* 1979 A.R. 910

¹⁵ *Re Crown Employees (Teachers, Education Teaching Services) Award*, [1991] NSWIRComm 14

¹⁶ *Re Crown Employees (Teachers in Schools and TAFE and Related Employees) Salaries and Conditions Award* [2004] NSWIRComm 113

As a result, the matters relied on in the IEU's submissions at: [8(b)], [10], [15], [17] and [70]-[72] in respect of why the matter cannot be dealt with within the 4 yearly award review or annual wage review, to which the ACA responds in its submissions at [106]-[107], are no longer relevant.

Update to wage rates

57. The IEU's primary submissions included, at Schedule C, a comparison table between the modern award rates and those paid to government-employed teachers in each state.
58. Since those submissions were filed, there have been increases to those rates. An updated table is at Schedule A to these submissions.

INGMAR TAYLOR SC
GREENWAY CHAMBERS
3 MAY 2019

LUCY SAUNDERS
GREENWAY CHAMBERS

