

FAIR WORK COMMISSION

Title of Matter: Application by the Shop Distributive and Allied Employees' Association to vary junior rates

Section: s158 Application to vary or revoke a modern award

Matter Number: AM2024/24

Awards: Fast Food Industry Award 2020
General Retail Industry Award 2020
Pharmacy Industry Award 2020

OUTLINE OF SUBMISSIONS

1. The Pharmacy Guild of Australia (the **Guild**) submits that the Pharmacy Industry Award 2020 (**PIA**) includes fair and relevant rates for junior employees and the variations sought by the Shop Distributive and Allied Employees Association (**SDA**) cannot be justified by work value reasons and are not necessary to meet the modern awards objective and minimum wages objective.
2. Throughout these submissions the reference to a junior employee is an employee, as defined at section 12 of the of the *Fair Work Act 2009* (**the Act**), as an employee who is under 21. An adult employee is an employee who is not a junior.

The Existing limitations on the use of juniors is appropriate and sufficient

3. The PIA was appropriately varied in 2017 to remove junior rates for all classifications other than for pharmacy assistants working at classification levels 1 and 2.
4. The SDA made the application for the substantive change to the Award in connection with the four yearly modern award review, it could have but did not make any application to vary the relativity between the junior and adult rate.
5. The Guild consented to the variation.
6. The Commission was satisfied that in making the variation the modern awards objective (section 134(1) of the Act) was satisfied.
7. The work performed by junior pharmacy assistants at level 1 and level 2 has not changed since that variation in 2017.

Skills and responsibilities of junior workers

8. The Guild rejects the SDA submission that work performed by junior pharmacy assistants aged 18,19 and 20 is the same as that of adult pharmacy assistants, or that the work performed by pharmacy assistants aged 16 is the same as that of a pharmacy assistant aged 17, or that the worked performed by a pharmacy assistant aged 17 is the same as that of a pharmacy assistant aged 18 (as expressed by the SDA in submissions filed on 6 November 2024)

9. The Guild submits that junior employees, on the whole, do not perform the work of a level 1 or level 2 pharmacy assistant with the same level of accountability and responsibility, or under the same conditions or with the same level of skill as adult employees.
10. The Guild accepts that some junior employees, as is the case with adult employees, will perform at a higher level than others. There is nothing preventing employers from recognising and rewarding those employees in ways additional to the minimum wages.

Training and Supervision

11. The Guild accepts that there is little to no difference in the basic training that an adult or junior level 1 or level 2 employee receives on commencement to perform the role (such as learning to operate the register). However, the Guild submits that there is an increased level of on the job supervision, support and monitoring of junior employees to maintain productivity and ensure the safety and well-being of the junior and customers. That observation and support of the junior by the employer, particularly in small businesses, is often not structured or formal and usually occurs without the junior employee being aware of it. Performance feedback, or direction and assistance provided on the job (listening in and jumping in to assist a customer), is frequently provided in such a way that the junior employee would not be aware that it was due to their own skill limitations.

Guild Lay Witnesses

12. The Guild lay witnesses will give evidence to the effect that as compared to adult pharmacy assistants, it is on the whole more likely that junior pharmacy assistants:
 - do not have the same level of emotional intelligence and empathy;
 - do not have the life experiences that assist in readily empathising with patients
 - do not have the same confidence to approach all types of patients in the pharmacy to offer assistance,
 - are less likely to be approached by customers for assistance,
 - require a higher level of supervision and monitoring and that the younger the worker the closer the supervision and monitoring.
 - are not expected to perform to the same level, it may take them longer to perform tasks and employers have a higher level of tolerance for minor mistakes or missed customer service opportunities
 - are less confident in dealing with general responsibilities that come with being an employee such as, reviewing rosters, calling in sick, personal presentation and approaching management
 - require a higher level of support and encouragement from the pharmacy owner / management generally to maintain engagement and productivity
 - are less likely to view working in the community pharmacy sector as a long term career
 - have limitations on the hours they can work due to school or university commitments and are engaged on a part-time or casual basis
 - are hired as investment in / commitment to the local community to provide job experience for young people
 - are rostered to work when the foot traffic in the store is less likely to be higher needs patients, such as in the evenings and weekends
 - are rostered to work together (i.e. more than one junior on a shift), particularly on weekends and evenings
13. The Guild lay witnesses will say that having regard to the matters set out above if it becomes more costly to hire junior pharmacy assistants at level 1 and level 2 of the PIA they will:

- i. likely offer the work to adult employees with greater work / life experience or junior employees who have attained the Certificate III pharmacy assistant qualification (for whom the adult rate applies).
- ii. Not offer, or significantly decrease, the hours offered to level 1 and level 2 pharmacy assistants aged 18,19 and 20, particularly those engaged on part-time or casual basis.
- iii. Consider reducing their opening hours, particularly at times when penalty rates apply.

The SDA Lay Evidence

- 14. The SDA evidence is not sufficiently probative to justify a variation to the PIA, for work value reasons or at all.

Expert Evidence

- 15. The SDA expert evidence largely deals with the employment of juniors in general retail and the fast food sector. To the extent that it deals with community pharmacy, the proposition advanced is that the impact on costs to employers would be low (said to be 0.4%) and there would be no significant impact on national economic performance.
- 16. The Guild submits that expert evidence does not take into account the decisions at a local level that each employer will make having regard to the profitability at any given hour of operation (particularly evenings and weekends), rather than the absorption of the cost across all current / potential opening hours. Such decisions may include reducing opening hours.

Work Value – Percentage of Adult rate

- 17. The SDA says that the current percentages applicable to junior employees was not properly set regarding work value (despite saying they have applied for decades and not raising the matter in the *Four Yearly Review*) but does not tell us how the percentages they put forward (other than for those 18 and above) are justified.
- 18. For those aged 18, 19 and 20 the SDA says 100% of the adult wages is justified because 18 is the age of majority and the work performed is the same as that of a person aged 21 or more. The Guild disagrees with that generalisation and notes that it does not take into account that pharmacy assistants in that age group, engaged at the lower classification levels, are more likely to be school leavers with limited life experience or university students not pursuing a career as a pharmacy assistant.
- 19. The SDA offers no reasonable work value based explanation as to why a junior pharmacy assistant aged under 16 should now receive 50% of the adult rate instead of 45%, or why a 17 year old should now receive 75% instead of 60% It appears that the percentage adopted is simply to secure a pay increase for those groups.

Work Value – Nature of the Work: Section 157(2A)(a)

- 17. The Guild rejects the SDA submission that the nature of the work performed by younger workers is the same as that performed by older workers when performed by pharmacy assistants at Level 1 or Level 2.
- 18. Junior pharmacy assistants at Level 1 and 2 perform often perform more limited duties and in a more supervised way as set out in the summary of the Guild lay witness evidence set out above.

Work Value – Level of skill or responsibility involved in doing the work: Section 157(2A)(b)

19. The Guild rejects the SDA submission that junior employees are able to take on positions of higher responsibility, that they train older employees and supervise and manage older employees.
20. Junior pharmacy assistants perform work relevant only to their level 1 or 2 classification level. While they may buddy up with new employees to show them how to use equipment (such as operating a register) they do not supervise them. In accordance with the PIA, supervisory duties are performed by employees at level 3 or above.

Work Value – The conditions under which work is done: Section 157(2A)(c)

21. The Guild rejects the SDA submission that managers / pharmacy owners, do not set different performance expectations for younger or older workers.
22. Pharmacy employers have a different expectation of junior workers including that they may perform more limited tasks and it may take them longer to perform tasks. Employers have a higher level of tolerance for minor mistakes or missed customer service opportunities

Date: 11 July 2025

IN THE FAIR WORK COMMISSION

Application by the Shop, Distributive and Allied Employees Association Junior Rates

Pharmacy Industry Award 2020

Matter No: AM2024/24

I, AMANDA CHISHOLM, General Manager, say on oath/affirm:

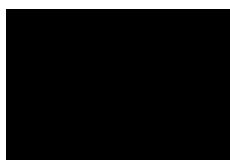
1. I make this affidavit in relation to the Shop Distributive and Allied Employees Association (**SDA**) claim to vary junior rates in the *Pharmacy Industry Award 2020 (the PIA)*.
2. I understand that the SDA seeks to vary the junior rates in PIA in the following way.

Age	Current % of Adult Rate Pharmacy Assistant Level 1 and 2 only	SDA % of Adult Rate Pharmacy Assistant Level 1 and 2 only
Under 16	45	
16	50	50
17	60	75
18	70	100
19	80	100
20	90	100

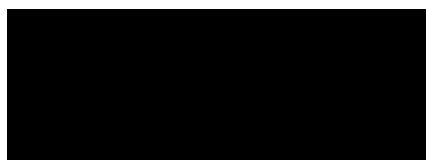
3. This affidavit by me accurately sets out the evidence that I would be prepared, if necessary, to give to the Fair Work Commission. This affidavit is true and correct to the best of my knowledge and belief.

Personal Background

4. I am the General Manager of AMT Pharmacy Services Pty Ltd (**AMT Pharmacy**) located at 3 May Terrace Brooklyn Park SOUTH AUSTRALIA 5032.
5. I have worked for AMT Pharmacy and in community pharmacy since 2014.
6. Initially, I commenced employment in a dedicated human resources management role, where I was responsible for all aspects of the employee lifecycle—including recruitment and selection, performance management, and remuneration.
7. During this time, I also managed the rostering for our pharmacies, coordinating shifts for all staff, including junior employees.
8. In my current role as Group General Manager, I oversee the total operations of our nine community pharmacies, which are located across South Australia, the Northern Territory, Tasmania, and Queensland. We employ approximately 150 staff across these locations.
9. I obtained a Bachelor of Economics in 1991 and completed a Graduate Diploma of Education in 2005. Prior to my career in pharmacy, I worked in human resources and



11/07/2025



11/07/25

operations roles across several manufacturing and retail organisations, including National Foods Ltd and Coles Myer Ltd.

Pharmacy Details

10. AMT Pharmacy's locations are set out in the table below:

<u>Allenstown Discount Pharmacy</u> Shop 19, Allenstown Square 139 Derby Street Allenstown QLD 4700	<u>Better Health Pharmacy Victoria Point Town Centre</u> Shop 22/349 Colburn Avenue Victoria Point QLD 4165	<u>Pharmacy + Co Kings Meadow</u> 133 Hobart Road Kings Meadows TAS 7249
<u>Pharmacy + Co Launceston Launceston Centre</u> 68A Brisbane Street Launceston TAS 7250	<u>Pharmacy + Co Fulham Gardens</u> Shop 1, 447 Tapleys Hill Road Fulham Gardens SA 5024	<u>Pharmacy + Co Old Reynella</u> 165 Old South Road Old Reynella SA 5161
<u>Salisbury Discount Pharmacy</u> Shop 1 7-9 Gawler Street Salisbury SA 5108	<u>Pharmacy + Co West Lakes</u> Shop 45, 111 West lakes Blvd West Lakes SA 5021	<u>Pharmacy + Co Coolalinga</u> Shop 2, Woolworths Shopping Centre Stuart Highway Coolalinga NT 0839

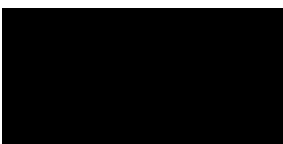
11. During my career I have worked with and employed numerous junior employees.

12. We currently employ 27 junior employees at our pharmacies. The table below sets out the current and historical number of junior employees employed at each of AMT Pharmacy's locations:

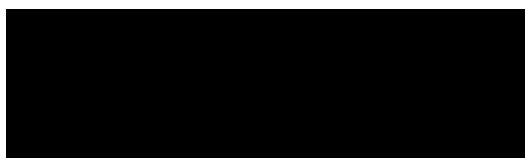
Store	2020	2021	2022	2023	2024	2025
Allenstown	2	3	3	5	5	6
Coolalinga	4	4	6	7	5	4
Fulham	5	3	6	10	7	3
Kings Meadows	2	2	5	7	7	6
Launceston	0	0	0	0	0	0
Reynella	1	3	4	1	0	1
Salisbury	2	0	1	1	0	0
Victoria Point	2	3	4	3	2	3
West Lakes	NA	0	2	3	6	4
Total junior employees	18	18	31	37	32	27

13. The below table sets out the current number of junior employees employed across all of AMT Pharmacy's locations by age:

14 years	0
15 years	3
16 years	2
17 years	7
18 years	3



11/07/2025



2/7

19 years	8
20 years	4

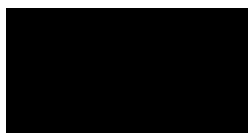
14. This year junior employees represent 18% of AMT Pharmacy's workforce. Over the last decade junior employees have accounted for, on average, 25% of our workforce.
15. The junior staff we employ are primarily engaged on a casual basis, largely due to the variable nature of available work hours and personal commitments such as schooling, which limit the number of hours they can work.

Why we employ juniors

16. Employing junior employees plays a vital role in ensuring the efficient and cost-effective operation of our pharmacies. With extended trading hours—often late afternoons, evenings, weekends, and public holidays—it is essential to have a reliable and flexible workforce available to meet customer needs and maintain service standards. Junior employees are predominantly employed on a casual basis and provide valuable supplementary labour to support these demands.
17. Furthermore, offering employment to young people in our local communities provides them with a positive introduction to the workforce. It gives them an opportunity to gain real-world experience, build valuable skills, and develop a strong work ethic—often creating a talent pipeline for future pharmacy assistants or other roles within the business.
18. Junior employees are an essential part of our team. They help us maintain consistent service coverage across our trading hours, support senior staff in day-to-day tasks, reduce staffing costs, and contribute meaningfully to our local community by offering youth employment opportunities.

Working Hours

19. Most of AMT Pharmacy's locations are open 7 days per week 8.30am-9.00pm.
20. We employ junior employees to cover late afternoon, evening, and weekend shifts. During school holidays and university breaks, many of our junior staff are available to take on additional shifts, which helps cover staff annual leave and maintain service levels.
21. The hours our junior employees work are largely determined by their availability, which is often limited due to school and university commitments.
22. This restricted availability limits the amount of on-the-job training juniors can receive, as they typically work during periods of minimal staffing. Senior team members are often not rostered during night and weekend shifts, which reduces opportunities for upskilling and development.
23. We often have two junior employees working together on a shift, where we might otherwise only have one adult employee. The current junior rates make that affordable and the juniors seem to enjoy having another person of their own age and experience on the shift with them.



11/07/2025



1 11/07/25

3/7

Junior Scope of Duties

24. We engage junior staff to perform suitable entry-level tasks such as point-of-sale operations, stock replenishment, and general shop maintenance. This enables us to allocate our mature age pharmacy assistants and dispensary staff to higher-responsibility tasks that require specialised training or knowledge.
25. This improves overall team productivity and optimises staff deployment. From a financial perspective, junior employees also help us manage labour costs without compromising service levels.
26. There is very little (if any) variance in the responsibilities expected of junior employees, although generally the younger the worker the higher the tolerance there is for minor mistakes or missed customer service opportunities. Those rare junior employees who are employed on a full time basis are usually paid above the Award.
27. Junior staff employed in retail community pharmacy typically begin with simple, routine tasks such as cleaning and stock replenishment. As they gain confidence and experience, they progress to operating the point-of-sale system and performing basic customer service duties.
28. While many basic retail tasks (e.g. shelf stocking, cleaning, and operating the cash register) are consistent across general retail and pharmacy environments, the key difference lies in the level of responsibility and supervision required. In general retail settings, junior staff often have more autonomy in assisting customers directly, especially when it comes to general product inquiries.
29. In contrast, junior retail pharmacy assistants typically operate under much closer supervision due to the complex and regulated nature of the products involved. As a result, junior staff in pharmacies are generally expected to defer customer questions or requests to more experienced or qualified staff.

Supervision of Juniors

30. For many junior employees their employment with AMT Pharmacy is their first job, so they often require close supervision and clear direction during the early stages of their employment. While there are exceptions, typically the younger a first time employee is the more supervision they will require. Sometimes the supervision isn't plainly obvious and it's more case of the pharmacist or senior person on staff maintaining a closer awareness of the what the junior employee is doing and intervening when appropriate.
31. Junior staff begin with very simple tasks such as cleaning, stock replenishment, facing up, and ticketing. In our pharmacies, checklists of duties and shift expectations are provided for all employees. These tasks are typically assigned one at a time for junior employees who seek guidance upon completion before moving on to the next activity.
32. In addition to task-based training, a significant amount of time is spent teaching fundamental workplace expectations—such as punctuality, appropriate dress standards, refraining from mobile phone use during shifts, and using initiative on the job. Many junior employees are unfamiliar with these expectations, and as a result,



11/07/2025



11/07/25

4/7

their productivity is initially lower while they develop good work habits and adapt to the professional environment.

33. Junior employees often require a higher level of support and encouragement to maintain engagement and productivity than older workers. Generally, younger employees are more easily distracted and often don't have the awareness of their surroundings than an older employee might have.
34. Junior employees do not have the same level of awareness of patients in the pharmacy, they don't have the peripheral vision to notice if a patient is browsing the aisles or need assistance. Patients in our pharmacies are generally looking for a high level of product knowledge from our staff or assistance with issues that are deeply personal and sensitive. Junior employees are not equipped to deal with these kinds of enquiries and so are reliant on mature and senior staff.

Training

35. In addition to requiring higher levels of on-the-job supervision, community pharmacy also necessitates specific training for junior staff related to pharmacy protocols and medications.
36. As all of AMT Pharmacy locations are QCPP-accredited pharmacies, all of our team members—including junior employees—are required to complete S2/S3 training, which covers the supply of pharmacy-only and pharmacist-only medicines.
37. This foundational training is essential for safe retail pharmacy practice and serves as a precursor to the Certificate II in Community Pharmacy. Investing in our junior team members, not only helps develop them as productive members of the workforce but also helps build their confidence.
38. When any new employee is onboarded, they are buddied up with a senior member of staff for 3 or 4 training shifts. We try and roster these training shifts during the day where possible (usually during school holidays for junior employees still in high school). Employees with previous work experience will often require fewer training shifts. Naturally, as junior employees generally have no previous work experience before working for us, they require additional training.
39. AMT Pharmacy provides ongoing training for all employees on specific health conditions or product knowledge, with all employees required to complete a certain number of training hours. 3 hours refresher training must be completed each year as part of QCPP requirements and our employees undertake this training whilst working, usually in 15-20 minute blocks over the course of a year.
40. AMT Pharmacy also provides in store training run by a member of the team, usually an intern, usually during quieter training periods and with an incentive. For example, training provided in the evenings is often done as a 'pizza night'. Any compulsory training provided outside of working hours is paid.
41. While juniors are expected to attend the training, it's not expected that they will be able to apply the knowledge as readily as more mature employees, or employees that work fulltime and have more experience in the pharmacy.



11/07/2025



11/07/25

5/7

Retention / Turnover

42. Over the past ten years, our average junior staff retention rate has been approximately three years. In comparison, over the same period the average retention rate for mature age employees was 4.5 years.
43. This reflects the transitional nature of junior employment, with many joining us while still in high school and then moving on as they commence university studies or pursue permanent career opportunities in their chosen fields.
44. Others remain with us throughout their tertiary education and depart upon graduation to begin their professional careers.
45. Of course, there are exceptions to this where junior staff pursue a career in pharmacy. For example, we have a junior employee from our Victoria Point Pharmacy who began working with us in 2014 at the age of 15. She remains employed with us today and is now working as a career Dispensary Technician. In another case, a junior team member who commenced working with us at age 14 in our Darwin pharmacy in 2019 is now a full-time Pharmacy Assistant. She is paid above the Award rate for a 19-year-old junior, in recognition of the higher level of responsibility and skill she now brings to the role. In both instances, junior rates were an incentive for AMT Pharmacy to invest in the time and training required to support the junior team member's development. If the SDA's application were successful, we would be more inclined to employ mature and often more experienced staff. These individuals typically reach higher productivity levels quicker and require less supervision and training investment to achieve expected performance standards than older employees.

If the Application was granted

46. If junior rates were increased or removed from the Award, we would be significantly less likely to employ junior staff, or as many junior staff, in our pharmacies. While we value the opportunity to support and train young people entering the workforce, the reality is that junior team members require a much higher level of supervision, structure, and support than more mature and experienced employees.
47. In a community pharmacy setting, this is especially relevant. Junior employees typically begin their employment with limited product knowledge, minimal customer service skills, and little to no experience in handling pharmacy-related procedures. They don't identify with nor can they empathise with a great range of our customers. Many of the skills required in our retail pharmacy environment—such as identifying common medications, understanding health-related queries, and advising customers on over-the-counter products—are developed over time and often stem from life experience.
48. As a result, the initial productivity of junior employees is relatively low, and considerable resources must be invested in training, supervision, and foundational workplace education. This includes everything from teaching punctuality and professional presentation to appropriate customer interaction and use of initiative on the job.

[REDACTED]

[REDACTED]

11/07/2025

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6/7

49. If we were required to pay higher rates or adult rates for junior staff with limited skills and experience, the cost-benefit balance of hiring younger workers would be significantly diminished. In that scenario, we would be far more likely to hire older, more experienced candidates who bring greater life experience, better communication skills, and familiarity with pharmacy products—resulting in a faster return on investment and a higher standard of service for our customers.
50. The current junior rates are appropriate and retaining them recognises the developmental nature of junior roles and enables businesses like ours to continue providing young people with valuable entry-level job opportunities, while maintaining a sustainable and efficient workforce.

#SWORN #AFFIRMED

At [place] [REDACTED]

On [date] 11th July 2025

Signature of deponent [REDACTED]

Name of witness [REDACTED]

On [date] 11 JULY 2025

Address of witness [REDACTED]

Capacity of witness [#Justice of the peace #Solicitor #Barrister #Commissioner for affidavits #Notary public]

And as a witness, I certify the following matters concerning the person who made this affidavit (the deponent):

- 1 #I saw the face of the deponent. [OR, delete whichever option is inapplicable]
 #I did not see the face of the deponent because the deponent was wearing a face covering, but I am satisfied that the deponent had a special justification for not removing the covering. [1]
- 2 #I have known the deponent for at least 12 months. [OR, delete whichever option is inapplicable]
 #I have confirmed the deponent's identity using the following identification document:

SOUTH AUSTRALIAN DRIVER'S LICENCE

Identification document relied on (may be original or certified copy)^[2]

Signature of witness [REDACTED]



[1] The only "special justification" for not removing a face covering is a legitimate medical reason.]

[2] "Identification documents" include current driver licence, proof of age card, Medicare card, credit card, Centrelink pension card, Veterans Affairs entitlement card, student identity card, citizenship certificate, birth certificate, passport or see Oaths Regulation 2011 or refer to the guidelines in the NSW Department of Attorney General and Justice's "Justices of the Peace Handbook" section 2.3 "Witnessing an affidavit" at the following address: <http://www.jp.nsw.gov.au/Documents/jp%20handbook%202014.pdf>]

IN THE FAIR WORK COMMISSION

Application by the Shop, Distributive and Allied Employees Association Junior Rates

Pharmacy Industry Award 2020

Matter No: AM2024/24

I, Jessica Knight, Human Resource Partner say on oath/affirm:

1. I make this affidavit in relation to the Shop Distributive and Allied Employees Association (SDA) claim to vary junior rates in the *Pharmacy Industry Award 2020 (the PIA)*.
2. I understand that the SDA seeks to vary the junior rates in PIA in the following way.

Age	Current % of Adult Rate Pharmacy Assistant Level 1 and 2 only	SDA % of Adult Rate Pharmacy Assistant Level 1 and 2 only
Under 16	45	
16	50	50
17	60	75
18	70	100
19	80	100
20	90	100

3. This affidavit by me accurately sets out the evidence that I would be prepared, if necessary, to give to the Fair Work Commission. This affidavit is true and correct to the best of my knowledge and belief.

Personal Background

4. I am a Human Resources Partner and an employee of Alive Pharmacy Warehouse (**Alive**). Alive is a network of 7 community pharmacies located in Far North Queensland.
5. I have been an employee of Alive for 5 years, working as in human resources since 2021. In my first year working for Alive, I worked largely as a pharmacy assistant in the pharmacy located in DFO Cairns.
6. I have a Bachelor of Business from James Cook University Cairns, with a major in human resources and sports and events management.
7. As part of my current role, I still work one day per week in our DFO Cairns pharmacy.

Pharmacy Details

8. During my time with Alive I have worked with numerous junior employees.
9. My interactions with junior employees have primarily involved the recruitment and onboarding of new junior employees. During my time with Alive, I have also occasionally assisted our pharmacies with delegation of duties and managing rosters in relation to junior employees.

10. In our DFO Cairns pharmacy, there are 2 junior employees. One is 19 years old and works for Alive full time, the other is working part time (20 hours per week) whilst studying in IT.
11. I estimate that Alive employees approximately 15-20 junior employees in our 7 pharmacies.
12. Alive is my first role as an HR Officer.

Why we employ juniors

13. I have found that there are various factors that make employing junior team members attractive. Primarily, junior employees are great for flexibility, adding a buffer to our rosters, especially for shifts that are difficult to cover, including late nights and weekends.
14. These shifts are usually quieter, and with the reduced cost of rostering junior employees, we are able to roster more during these shifts, enabling juniors to work together and more tasks to be completed during these quieter hours.
15. Hiring junior employees is also a great funnel for young kids who want to pursue a career in health or pharmacy. There is no other junior or retail space for kids to get a taste of the pharmacy profession or medical services generally.

Working Hours

16. Each of our 7 pharmacies has different opening hours that impact the shifts available for all employees.
17. Across all of our pharmacies, junior employees tend to work shifts during quieter trading hours, whilst skilled and senior team members work during peak and busy hours when customers are more likely to need to talk to a staff member about their health needs
18. Junior employees want to work these shifts largely because of their school/university availability. With penalty rates applying after 7 PM and on weekends, there is a cost element to rostering junior employees during these quieter hours as well.
19. We currently primarily employ junior employees part-time to work an average of 6-12hrs per week. However we are shifting more to casual employment due to juniors having unpredictable availability due to school and family factors.
20. Shifts are usually 3 hours during the week. On weekends employees over the age of 16 may also work a full day.
21. There is a difference between junior employees who are still at school or university and those who are employees on a full time basis. Whilst length of service can impact the level of knowledge a junior employee may have, full time employees naturally gain more experience than those working part time.
22. There is also a difference in duties between full time and part time team members. We involve full time team members in assisting with invoices and stock management

(inventory) as well as other duties not expected of part time employees. This means that the scope of a full time team member is significantly broader.

23. The employment status and age of an employee also impacts the team member's product knowledge, with part time and junior staff often unable, and not expected, to assist with customer inquiries regarding our products.
24. There are also a variety of other limitations and factors that impact the value of junior employees. Fundamentally, the level of confidence a junior employee has determines their capability to perform well.
25. Junior employees are also usually reliant on their parents, which can restrict their availability to work shifts.
26. The age of a junior employee will also impact the scope of responsibility that can be given to them in store, which can limit their value. For example, a 16 year old team member would not be able to work in the first aid, diabetes or dispensary sections/areas of the pharmacy as these require a lot of background knowledge.
27. The senior member of staff at any given point in time will always be the pharmacist. This results in junior employees who are inexperienced being restricted to restocking shelves or working on the register. Any task or responsibility that would otherwise require a high level of supervision won't be expected of a junior employee.
28. There is also a significant difference in the training learning curve for junior employees in comparison to employees over the age of 21. Junior employees rarely commence with us with any work experience or transferable skills at all. For many junior employees, working in our pharmacies is their first job. Employees over the age of 21 usually have some level of work experience and maturity to allow them to take on more responsibility and show more initiative. This has a large impact on the value of junior employees.
29. I have found that there is also a difference when considering the performance management required of junior employees and those over the age of 21. On balance, junior employees require more performance management and training than those over the age of 21. This can be because of a lack of confidence and maturity.

Junior Scope of Duties

30. All junior employees perform up to 60% of the duties covered by their classification level.
31. All Level 1 staff should be able to respond to other stores and assist (especially with the movement of stock). Junior employees, particularly those who are employed part time, are unable to perform this task.
32. Junior employees would also unlikely be capable of receiving stock.
33. There is a variance in the duties given to junior employees largely based on their age or employment status. Some 18 year olds have previous work experience and might

be capable of taking on more tasks. Junior employees who have worked with us for longer will also be able to complete a broader range of duties.

Supervision of Juniors

34. All new employees require some level of supervision during their onboarding. The length of supervision is definitely more for junior employees and there is more of a "buddy-up" system during the first few months after a junior employee commences with us.
35. This direct supervision decreases as the junior employee becomes more confident but they still require regular check ins with a more senior member of staff.
36. We have also rolled out a list of duties for junior employees to sign off during their shifts to improve their accountability and supervision. The tasks includes face (turning products around on the shelf) and fill stock, merchandising, cleaning shelves, vacuuming, emptying bins, unpacking certain orders (depending on what has arrived and what is within the scope of a junior employee to unpack).

Training

37. Alive provides access to external training for all employees. This external training is online based and is not usually taken advantage of by junior employees.
38. Alive also provides in person training and professional development sessions for all staff. These are not usually taken up by junior employees because of the nature of the training.
39. The time taken to onboard and train a new employee varies according to the age and expectations of the employee. For example, a 16 year old who will only work one shift a week and for whom we won't have the same expectations as a full time team member, will be provided with less training.
40. Any expansion of an employee's scope of tasks/duties, will include on the job training as needed. On the job or ad hoc training provided to junior employees generally takes longer than mature or senior employees.

Retention / Turnover

41. The rate of turnover of junior employees is higher than those over the age of 21, with quite a few who do not pass their probation period. Basic job performance in junior employees can be a problem.
42. High school pressures and changes to university time tables also impact the turn over in junior employees.
43. Being based on Cairns, a lot of junior employees move away after high school or university as well.

If the Application was granted

44. If the SDA's application was granted, there would be an impact on our willingness to hire junior employees.
45. There would be a substantial increase in cost of 16 and 17 year olds, and so there would be a reduction in hiring for these ages. If we could hire a 21 year old who can work more hours and perform better, then this would be preferable than 16 or 17 year olds who are not paid much less.
46. There would probably be little impact on our willingness to engage full time employees if the application was granted, particularly those over the age of 18 as we would hope that they would become long term employees and we would have a much better chance of a return on our investment, given the hours they would work and with more support from highly trained staff . It remains my view though that an 18 year old school leaver does not have the same immediate productivity value as an employee aged 21 or more with greater work and life experience.
47. We would also likely reduce the number those over the age of 18 we employ on a part time basis, who do not have an interest in a career in the pharmacy or medical profession. We would instead look to employ more mature workers, with more life experiences and greater confidence with customers.

#SWORN ~~#AFFIRMED~~

At [place] *CAIRNS*

On [date] *14 JUL 2025*

Signature of deponent [Redacted]

Name of witness [Redacted] **Justice of the Peace (Qualified)**

On [date] *14 JUL 2025* **Justice of the Peace (Qualified)**  **Department of Justice** [Redacted]

Address of witness [Redacted]

Capacity of witness **[#Justice of the peace #Solicitor #Barrister #Commissioner for affidavits #Notary public]**

And as a witness, I certify the following matters concerning the person who made this affidavit (the deponent):

- 1 **#I saw the face of the deponent.** [OR, delete whichever option is inapplicable]
~~—#I did not see the face of the deponent because the deponent was wearing a face covering, but I am satisfied that the deponent had a special justification for not removing the covering.[1]—~~
- 2 ~~—#I have known the deponent for at least 12 months. [OR, delete whichever option is inapplicable]—~~
#I have confirmed the deponent's identity using the following identification document:

QLD DRIVERS LICENCE
Identification document relied on (may be original or certified copy)^[2]

Signature of wit [Redacted]



[¹] The only "special justification" for not removing a face covering is a legitimate medical reason.]

[²] "Identification documents" include current driver licence, proof of age card, Medicare card, credit card, Centrelink pension card, Veterans Affairs entitlement card, student identity card, citizenship certificate, birth certificate, passport or see [Oaths Regulation 2011](#) or refer to the guidelines in the NSW Department of Attorney General and Justice's "[Justices of the Peace Handbook](#)" section 2.3 "Witnessing an affidavit" at the following address: <http://www.jp.nsw.gov.au/Documents/jp%20handbook%202014.pdf>]

[Redacted]

IN THE FAIR WORK COMMISSION

Application by the Shop, Distributive and Allied Employees Association Junior Rates

Pharmacy Industry Award 2020

Matter No: AM2024/24

I, Robert King, Pharmacist, say on oath/affirm:

1. I make this affidavit in relation to the Shop Distributive and Allied Employees Association (SDA) claim to vary junior rates in the *Pharmacy Industry Award 2020 (the PIA)*.
2. I understand that the SDA seeks to vary the junior rates in PIA in the following way.

Age	Current % of Adult Rate Pharmacy Assistant Level 1 and 2 only	SDA % of Adult Rate Pharmacy Assistant Level 1 and 2 only
Under 16	45	
16	50	50
17	60	75
18	70	100
19	80	100
20	90	100

3. This affidavit by me accurately sets out the evidence that I would be prepared, if necessary, to give to the Fair Work Commission. This affidavit is true and correct to the best of my knowledge and belief.

Personal Background

4. I am a pharmacist and a proprietor of
 - a. TerryWhite Chemmart Kanwal Village located at Shop 1 260 Wallarah Road KANWAL NSW 2259 (**TWC Kanwal Village**);
 - b. TerryWhite Chemmart Wadalba located at Shop 1 2 Edward Stinson Avenue WADALBA NSW 2259 (**TWC Wadalba**);
 - c. TerryWhite Chemmart Noraville located at 85 Main Road NORAVILLE SA 5204 (**TWC Noraville**);
 - d. TerryWhite Chemmart New Lambton located at 83 Regent Street NEW LAMBTON NSW 2305 (**TWC New Lambton**); and
 - e. TerryWhite Chemmart Toowoan Bay located at 96-98 Toowoan Bay Road TOOWOON BAY NSW 2261 (**TWC Toowoan Bay**).
5. I am currently in the process of selling TWC Toowoan Bay.
6. I obtained a Bachelor of Pharmacy in 1988 and became registered as a pharmacist in 1989.

7. I have worked my whole professional career in community pharmacy, beginning as an intern in 1989 and purchasing my first community pharmacy in 1994.
8. I work in a management and business development role across all of the five pharmacies listed in paragraph 4 above.

Pharmacy Details

9. TWC Kanwal Village is open between 8.30 AM and 7 PM weekdays, 8.30 AM to 4 PM on Saturday and 9 AM to 1 PM on Sunday.
10. TWC Wadalba is open between 8.30 AM and 7 PM weekdays, 9 AM to 4 PM on Saturday and 9 AM to 1 PM on Sunday.
11. TWC Noraville is open between 8.30 AM and 6 PM weekdays, 9 AM to 4 PM on Saturday. TWC Noraville is closed on Sunday.
12. TWC New Lambton is open between 8.30 AM and 5.30 PM on weekdays and 8.30 AM to 12.30 PM on Saturday. TWC New Lambton is closed on Sunday.
13. TWC Toowoong Bay is open between 8.30 AM and 6 PM weekdays and 9 AM to 1 PM on Saturday. TWC Toowoong Bay is closed on Sunday.
14. During my career I have worked with and employed numerous junior employees.
15. I currently employ 22 junior employees across the five pharmacies listed in paragraph 4 above.
16. The majority of the junior team members in my pharmacies are aged between 16 and 18 years of age (12 of the 22 junior employees are aged between 16 and 18).
17. Most of my junior team members are still in high school. A few junior employees have finished high school early and are employed on a full time basis either as a trainee or pharmacy assistant.
18. The vast majority of junior employees in my pharmacies are employed casually and typically work one or two shifts week usually in evenings or weekends primarily after school hours.

Why we employ juniors

19. We primarily employ junior employees to balance our work force between senior and junior employees from a resourcing, availability and wages cost perspective.
20. Junior employees are generally available during times when our senior and full time members of staff prefer not to work, such as weekends and evenings, and so it assists in ensuring our roster is covered and offsets the costs of penalty rates.
21. I think there is a huge benefit in being able to train junior employees in your systems and procedures where they do not have any pre-existing behaviours from other workplaces.
22. We also engage junior employees in order for them to complete simpler or "lower value" duties that are less suited to mature and senior staff.

Working Hours

23. Casual junior employees tend to fill afternoon and weekend shifts. It is common for junior employees who are employed on a full time and part time basis to work full day shifts.
24. Employees do not work across my pharmacies unless there is an emergency and absolutely no alternative.
25. Junior employees, especially those who are casual team members, tend to have reliability and commitment related issues, which impacts their value to the business. In my experience they tend to prioritise social, sporting and other commitments over work.
26. As junior employees gain more experience in the pharmacy, they become more capable of performing their duties effectively. This can lead to junior employees eventually being trusted to complete other duties such as assisting the Pharmacist opening or closing the store and so experience is very important in terms of a junior employee's capacity to provide value to the business.
27. The lack of life experience of junior employees is also a big limitation on their training potential. For example, we no longer offer Certificate Level 3 and 4 training to staff under the age of 21 because whilst they can complete the modules quickly (one 18 year old completed the training in less than 12 months), completion of that training does not equip them with the soft skills and emotional intelligence to be able to operate at the level expected of a Level 3 or 4 pharmacy assistant
28. In previous years we have trained a few junior employees aged 17 and 18 as Level 3 pharmacy assistants, after which they were paid as adults. Unfortunately, despite the additional formal training, there was still a large capability gap between these junior Level 3 team members and those over the age of 21. The junior Level 3 team members still had a poor product knowledge and there was a reluctance for patients to speak with junior team members for advice, wanting to speak with someone more senior and experienced.
29. Generally speaking, age is also factor in the confidence of an employee and junior team members can often lack confidence to consistently perform their customer service related duties. Junior employees have not had enough life experience to have the confidence to deal with all types of customers in the pharmacy.
30. It has been my experience that many junior employees lack a high level of emotional intelligence because of their age and lack of life experience. This is a skill set that comes with time and maturity, which whilst not impossible to find in young people it is not something I commonly encounter.

Junior Scope of Duties

31. Typically, junior employees start with menial/basic duties including cleaning, cash registers (cash and wrap), marking off inventory, and after training might put stock on shelves, customer assistance (locating products not necessarily providing advice).

32. There is not a large variance in the duties and expectations of junior employees based on their age but there can be a difference in their capability and performance.
33. This variance in performance is tied to the junior employee's level of experience and commitment to work. For example, I have had one junior team member working for me since they were 15 years old and now, they are 19 years old and is far more capable than other 19 year olds who have just started working for me.
34. Some team members who have been with me for a long time will be given responsibilities, including potentially being involved in ordering, planograms (laying out shelves according to a diagram) and other jobs that require higher level of experience and skill set. This might also include ticketing/merchandise and checking pricing. All of this work is double checked by management or a more senior employee either while the junior is performing the work or later.
35. The level of training, maturity and experience of a junior employee will determine whether we engage them to perform different duties. In my experience it is typically the case that the younger the employee the lower the level of maturity and experience they have. Sometimes a younger junior may out perform an older junior, or an older junior may still only be confident in performing the basic tasks. In rare circumstances, where the junior employee has demonstrated strong performance and maturity, we will provide them training to work in areas that require a higher skill set, for example working on the scripts in or out counter and they will work under the direct supervision of the pharmacist on duty..

Supervision of Juniors

36. All of my stores have a front of shop store manager and all junior employees are managed by them. This includes allocating task to junior employees and general supervision.
37. We provide checklists and have duties associated with certain shift times that are expected of all employees.
38. Junior employees require much more direction than mature members of our team, which is provided by our store managers. They often require encouragement and checking in on them to keep them during their shift to keep them motivated and focussed.
39. Store managers will also be responsible for the day to day/ad-hoc training of junior employees and oversee them as they learn a new task including providing demonstrations.
40. We more closely supervise junior employees on shifts than more mature members of staff to ensure that they are performing appropriately and a senior member of staff can easily assist for difficult/complex inquiries or customers.

Training

41. Onboarding of all of our employees includes an induction and paperwork (policies etc.), a tour of the pharmacy and demonstration of tasks/duties. This is a more time

consuming process for junior employees who require to be taught more basic skills that more senior/mature team members already have.

42. Typically, junior employees will start on the cash register buddied with someone to watch them process transactions and to assist with questions.
43. We also have available for all staff a series of modules provided by TerryWhite Chemmart which includes induction modules for customer service (guidance on answering the phone, engaging with customers, customer greetings etc.). These basic modules and introduction to pharmacy aren't expected to be completed by senior staff.
44. We encourage all staff to complete modules every month. We also run all staff meetings that involve some kind of training usually 2-3 times per year. All of staff meetings are optional but time in lieu is given to all those who do attend.
45. The learning curve is much steeper for junior employees. I think that the learning curve is always large for any new employee with no pharmacy experience. However, where we have hired a mature team member, we will have only done so if they have some other skill set that we need (e.g., managing people, retail/merchandising). I don't recall ever employing a senior team member with no experience in pharmacy that didn't have some kind of special skill. In comparison, junior employees are completely blank canvasses who generally have no previous work experience and require significantly more training even of basic skills.
46. There is a large knowledge gap of illness and pharmaceuticals between junior and senior employees, based again on a lack of life experience.
47. We offer training for any team member who wants to do additional or even paid training. Ad-hoc training is provided each time a team member's scope of duties changes.

Retention / Turnover

48. There is a higher turnover of junior employees than senior employees. Retention is multifactorial and in my view centres on providing what the employee wants from their employment. We have junior employees who are seeking work whilst they do other things (study, training, travel) and for them their employment with us is temporary and about flexibility. They are not seeking a career in pharmacy and so in order to retain them we must roster them to fit in with other priorities and their education.
49. There are some junior employees who are looking for a career in pharmacy as a pharmacist or even a pharmacy assistant. They have different needs from their employment, will usually be full or part time and require training to allow them to upskill and progress.
50. More senior or mature employees require stability in their employment. Their employment is their source of income and they are usually balancing more responsibilities personally/at home and so giving certainty to their working hours is important to their retention.
51. The higher turnover in junior employees compared to senior team members links to their different stages of life. In my experience junior employees experience more

change during their lives (personal/home/family environment) than older employees who are typically more settled.

52. There is also a natural end to some junior team members employment that you know is coming when they are studying. Once they get their qualification, even though they may have worked with us casually for 4 or 5 years, they want to move into their career job. Those junior employees who have been with the business for a long period of time when they graduate from their qualification are usually very capable by this time and so their loss is felt in the business.

If the Application was granted

53. There would be a significant impact on younger employees and candidates if the SDA's application was granted. Junior candidates would be at a significant disadvantage to more mature candidates who likely will have more experience and training than them.
54. In my view, 18 to 21 years of age is a critical opportunity for employers and pharmacy owners to provide training and experience to younger employees to create a very valuable team member. This training requires a significant investment in time and resources because of the age and maturity of junior employees, which would no longer be offset by junior rates.
55. Junior employees require more supervision and training in order for them to perform effectively and without junior rates, or if the junior rates were increased, younger candidates will be disadvantaged.
56. We will be less inclined to hire junior employees if the SDA's application were granted. If we were hiring and the choice came down to an 18 year old who was straight out of school with no work experience and a 25 year old who has worked before, we will pick the 25 year old every time.
57. In my opinion, if the SDA's application were granted there is a potential to affect the access of the community to health care. If wages cost increased I would consider reducing my opening hours, particularly at times when penalty rates apply. The economics of opening during penalty rate periods is already marginal and removing junior rates may tip the scales to make opening unviable.

#SWORN #AFFIRMED

At [place]

On [date] 13th July 2025

Signature of deponent

Name of witness

On [date]

Address of witness

Capacity of witness

[#Justice of the peace #Solicitor #Barrister #Commissioner for affidavits #Notary public]

And as a witness, I certify the following matters concerning the person who made this affidavit (the deponent):

- 1 #I saw the face of the deponent. [OR, delete whichever option is inapplicable]
~~#I did not see the face of the deponent because the deponent was wearing a face covering, but I am satisfied that the deponent had a special justification for not removing the covering. [1]~~
- 2 #I have known the deponent for at least 12 months. [OR, delete whichever option is inapplicable]
~~#I have confirmed the deponent's identity using the following identification document:~~

Drivers Licence

produced on (may be original or certified copy)^[2]

Signature of witness

[1] The only "special justification" for not removing a face covering is a legitimate medical reason.]

[2] "Identification documents" include current driver licence, proof of age card, Medicare card, credit card, Centrelink pension card, Veterans Affairs entitlement card, student identity card, citizenship certificate, birth certificate, passport or see Oaths Regulation 2011 or refer to the guidelines in the NSW Department of Attorney General and Justice's "Justices of the Peace Handbook" section 2.3 "Witnessing an affidavit" at the following address: <http://www.jp.nsw.gov.au/Documents/jp%20handbook%202014.pdf>]

IN THE FAIR WORK COMMISSION

Application by the Shop, Distributive and Allied Employees Association Junior Rates

Pharmacy Industry Award 2020

Matter No: AM2024/24

I, QUINN ON, Pharmacist say on oath/affirm:

1. I make this affidavit in relation to the Shop Distributive and Allied Employees Association (**SDA**) claim to vary junior rates in the *Pharmacy Industry Award 2020 (the PIA)*.
2. I understand that the SDA seeks to vary the junior rates in PIA in the following way.

Age	Current % of Adult Rate Pharmacy Assistant Level 1 and 2 only	SDA % of Adult Rate Pharmacy Assistant Level 1 and 2 only
Under 16	45	
16	50	50
17	60	75
18	70	100
19	80	100
20	90	100

3. This affidavit by me accurately sets out the evidence that I would be prepared, if necessary, to give to the Fair Work Commission. This affidavit is true and correct to the best of my knowledge and belief.

Personal Background

4. I am a pharmacist and the proprietor of :
 - a. Menai Wholelife Pharmacy & Healthfoods located at C1.4 Ground Floor Building C 5-21 Carter Road MENAI NSW 2234 (**Menai Wholelife**);
 - b. Priceline Pharmacy Menai located at T04 Menai Market Parade, Allison Crescent MENAI NSW 2234 (**Menai Priceline**); and
 - c. On's Pharmacy located at 2/76-80 John Street CABRAMATTA NSW 2166.
5. I also assist in the management of 2 other pharmacies:
 - a. Terrywhite Chemmart Illawong located at Shop G12-G14 Illawong Shopping Village, 273 Fowler Road ILLAWONG NSW 2234; and
 - b. Priceline Pharmacy Cabramatta . 67 John St, CABRAMATTA NSW 2166
6. I have worked in community pharmacy since 1992, first as a pharmacist intern in Penrith. I purchased my first pharmacy in 1994.
7. I am a current member of the Pharmacy Council of NSW, having commenced my second 3 year term in April 2025.



8. I am responsible for assisting in the people management of all of the pharmacies referred to in paragraphs 4 and 5 above, including recruitment, performance management, and payroll.
9. I obtained a Bachelor of Pharmacy in 1991 and I have been registered as a pharmacist with the Australian Pharmacy Board since December 1992.

Pharmacy Details

10. The Menai Wholelife pharmacy is open 8.30 AM to 7 PM Monday to Friday, 8.30 AM to 5 PM on Saturday and 9 AM to 5 PM on Sunday.
11. Menai Priceline is open 8.30 AM to 9 PM Monday to Friday and 8.30 AM to 5.30 PM on Saturday and Sunday.
12. On's Pharmacy is open 8.30 AM to 6 PM Monday to Friday and 8.30 AM to 5.30 PM on Saturday and Sunday.
13. During my career I have worked with and employed numerous junior employees.
14. I currently employ 34 junior employees at my pharmacies. The below table sets out the current number of junior employees employed at my pharmacies by age:

14 years	1
15 years	4
16 years	11
17 years	3
18 years	6
19 years	6
20 years	3

15. 31 of the junior employees employed at my pharmacies are casual employees, one is part time and two are full time. 20 of the junior team members are still in high school, two are trainees, 11 are at studying at TAFE/university and one is a school leaver.
16. I estimate that of all of the junior employees at my pharmacies, the majority are students and employed on a casual basis.
17. For most of the junior employees at my pharmacies, especially those under 16 years of age, their employment at my pharmacies is their first work experience.
18. It is my practice to encourage junior employees who are seeking full time employment to pursue a Certificate III in Community Pharmacy as securing this qualification provides them with better pay and employability long term. I prefer to pay these junior employees higher than trainee wages whilst they complete their qualification to encourage them to finish the course as quickly as possible. On completion of the qualification, and in compliance with the Award, they receive the Level 3 adult rate.

Why we employ juniors

19. There are various reason why I employ junior employees. They are a good support for my pharmacies, have a reduced cost and provides a great way to connect well with our local community.

20. Many parents are customers who encourage their kids to apply for work in the pharmacy as a first job. Local schools also approach me to employ their students. It has been my experience that parents and schools view a first job for kids in pharmacy as a superior alternative to general retail and hospitality.
21. Junior employees also have a desirable availability. School students are only available afterschool and on weekends, largely during period where penalty rates apply and so rostering junior employees during these periods allows for greater staffing levels in the pharmacies. These times are also less sought after by mature full time and part time staff so hiring junior employees helps ensure these shifts can be filled.
22. I also like employing junior team members to contribute to their professional education. I enjoy being involved in upskilling junior employees and being a part of their development and success. For example, I employed a 19 year old who finished high school but didn't know exactly what she wanted to do for a career. She wasn't committed to pharmacy but the junior rates provided an incentive for me to see how she would go. I encouraged her to pursue a Certificate III in Community Pharmacy and after a few weeks she fell in love with being involved in dispensing. She has now been employed by me for 10 years and is a manager of our dispensary.
23. Junior rates allow me to take a chance on someone who is not committed so that I can invest the time in their education. If the SDA application was successful and adult rates applied to 19 year old juniors who haven't completed the Certificate III qualification, I would be less likely to employ juniors and more likely to look for employees with more life experience.

Working Hours

24. Junior employees often work during the afternoons/evenings, generally starting at 4 or 5PM and working a 4 hour shift.
25. Junior employees also tend to do 4 hour shifts on weekends as well, only working longer when it is completely necessary such as covering shifts when someone else in the team is unexpectedly unable to work. We usually employ juniors from 9am – 1pm and 1pm to 5pm or 10am – 2pm to cover for lunches. For late opening stores they either work 4pm – 7pm, 4pm – 8pm or 5pm – 9pm.
26. These shifts are usually preferred by junior employees because they are outside of school hours and they can still engage in sports, study and leisure activities on the weekend.
27. Some university students or junior employees over the age of 18 will be available outside of these hours, for example, some can work during school hours. These team members still prefer the flexibility of casual work and will let me know they are not available when they need to study for exams or travel or other reason.
28. Junior employees who are not students and whose job in the pharmacy is their primary work/income, tend to have greater availability. In my pharmacies these employees tend to be the 18 or 19 year old school leavers who haven't gone onto university or other vocational training. These employees are usually engaged on a fulltime or part time basis.

29. Junior employees who work on a fulltime gain experience and typically become more capable quicker than juniors who work less hours. Typically that results in more opportunities to learn from the pharmacist and senior employees at times when there are less customers in the store.
30. Mature workers in general have a greater level of commitment and work ethic than young people. For younger workers, particularly those not working fulltime, it's less about establishing a career and more about earning spending money for other activities. This significantly lower level of commitment in particular has a large impact on their value as employees.
31. Many junior employees are also completely reliant on their parents for transportation (even those above 18 years old in many cases). This can impact on their availability more than mature employees.
32. It has been my experience that junior employees have far greater reliability issues than mature age team members.
33. For most junior employees, their work with me is their first job and so they have no prior work experience and a general lack of life skills/experience. This means that not only do they need to learn the skills associated with the position, but also the general requirements of being an employee, such as punctuality, appearance, completing employment forms, completing time sheets, understanding what policies are, how to read a roster, learning about the award, how to speak to supervisors. Junior employees typically have not had enough life experience or life skills to appreciate the bigger picture of what comes with being an employee.

Junior Scope of Duties

34. In my pharmacies junior employees are typically given tasks that are more process driven, including registers, assisting/promoting loyalty programs, checking stock, charge for prescriptions as well as general cleaning and tidying. In my experience, junior staff can take significantly longer to complete a cleaning task compared to an adult.
35. There is some variance in duties expected of junior employees, largely dependent on the team members age, maturity and how frequently they work.
36. For example, an 18 year old employee who works full time may be given some dispensing related duties as they are easier to train (working every day) than a casual employee. It is my experience that a lack of continuity in training prevents us from giving high-level skilled tasks to many junior employees.
37. Similarly, tasks related to ordering of stock would only be asked of a junior employee who is of a certain age and maturity where they can be trusted to complete those duties without the costs attaching to a high level of supervision. Generally, it would be unlikely that we give stock ordering to a junior staff member.
38. In very rare circumstances, with a very intelligent and mature 18 year old, we might also given them training to assist with webster packs but only where the relevant junior employee shows an eagerness to learn. That task must be performed under the

supervision of a pharmacist and typically at times when there are less customers in the store

39. I understand that the Award rate is the minimum rate for duties performed at a certain level. In my pharmacies juniors are typically paid Award rates, other than fulltime juniors who are working towards a Certificate III qualification who, as they progress through their training, will be paid over the Award rate.

Supervision of Juniors

40. All junior employees are given a list of jobs by a manager when they start their shift. Each junior team member is assigned specific tasks and the junior team member ticks it off.
41. Mature members of staff also have to keep an extra eye and ear out for junior employees whilst on shift to ensure they are working properly. We have had frequent performance issues with junior team members who like to chat.
42. Junior employees who treat their employment as spare cash rather than income they rely on tend to require more supervision, particularly in comparison to mature team members.
43. Our manager will often look at surveillance when jobs are not completed by junior employees, something that is not required for mature team members. We have found that when junior team members are not properly supervised some will simply stand around, some draw pictures or even write poetry if they are not supervised.
44. These behaviours mean that junior employees require a lot more micromanagement, something that is significantly less likely to be required for senior staff.
45. The additional supervision time and cost to the business, and the reduced productivity of the junior employees, is in my opinion offset by the junior rates.

Training

46. All new starters shadow a full time team member (usually a manager) and are only rostered during weekdays for their first 5 -10 shifts. This is to prevent new team members from learning from a casual team member or junior employees.
47. During these shadow shifts, employees would be shown how to greet customers, taking payments and work on the registers, how to scan products and prescriptions properly, promoting loyalty program, marking off stock as well as rotating and filling stock. I do not expect that junior employees would be proficient at all of these tasks after the first 10 shifts. I expect that they would have enough knowledge to work under either direct supervision or with more senior employees available to assist as required, and that the junior would feel confident enough to ask for help when required.
48. We also require all staff (including casual or part time juniors) to complete a 20-30 minute module each week for knowledge development, including for headlice, smoking cessation, fever, pain and general ailments. These modules are required regardless of how frequent a team member works. I have a lower expectation of junior employees

than mature workers about the likelihood that they will effectively utilise this information to assist customers or provide holistic care.

49. The time taken to train, both during on boarding and for continuing education, junior employees tends to be much longer than mature team members. Mature employees have some degree of life experience and so they tend to understand concepts much quicker than junior employees learning them for the first time.
50. Training junior employees generally also requires you to be more elaborate and detailed as they require greater explanation of even basic skills and knowledge because they have no real previous work or life experience. More mature workers understand that their role plays a part in the overall operation of the business and can see a bigger picture. Junior employees are much more focussed on performing single tasks at a time.
51. My Retail Manager often finds that a significant portion of their training efforts must be directed toward junior staff, rather than senior team members. This is primarily because many junior employees are entering the workforce without foundational life skills or workplace experience.
52. They require guidance on essential interpersonal and operational skills such as:
 - a. How to greet customers and provide basic customer service
 - b. How to handle difficult or abusive customers respectfully and safely
 - c. How to manage situations involving suspected theft
 - d. Basic phone etiquette and communication
 - e. Workplace responsibilities like cleaning, using equipment (e.g., vacuum cleaner, mop)
 - f. Product knowledge, including basic training on vitamins and general store categories
53. While there are a few younger staff members who are genuinely interested in learning and building a career in pharmacy, the majority appear to view the role as a short-term job, often for casual spending. Many also prefer roles that require minimal customer interaction, which presents additional challenges in a highly service-driven environment.
54. Despite these obstacles, we provide consistent support and mentoring to ensure all junior staff are equipped to meet our expectations in order to deliver quality service to our customers.

Retention / Turnover

55. I retain a lot of my junior employees for a significant length of time, often while they are completing their studies. Despite this, on average there would be a higher turnover rate in junior employees when compared to mature age team members.

56. Unless a junior team member is interested in pursuing a career in the pharmacy or medical profession, they often want to move on to try different things.
57. Junior employees who are studying will also naturally want to move on after they have completed their relevant qualification in their chosen field.
58. The reduced retention time is offset by the junior rates.

If the Application was granted

59. If the SDA's application was granted, the wage expenses in my pharmacies, particularly at times when penalty rates apply, would be higher and it would have an adverse impact on profit margins. I would look for ways to maintain current profit margins.
60. I would review our existing closing times and my pharmacies are less likely to stay open longer hours or at times when penalty rates are payable..
61. If we were required to pay the higher junior rates or the same rate as an adult, I would prefer someone with better life experience than a junior employee. There is a much greater value and performance from mature aged team members.
62. In my pharmacies I would still seek to employ full time team members regardless of their age, given how difficult it is to find full time employees, or those who want to work in the pharmacy profession.
63. If the application was granted, in my opinion there would be a reduced opportunity for young people to enter the workforce and learn at younger ages. The current junior rates allow more junior team members to be hired and are appropriate to offset the other business costs associated with their employment.

IN THE FAIR WORK COMMISSION

Application by the Shop, Distributive and Allied Employees Association Junior Rates

Pharmacy Industry Award 2020

Matter No: AM2024/24

I, Wisam Zoghbi, Pharmacist say on oath/affirm:

1. I make this affidavit in relation to the Shop Distributive and Allied Employees Association (**SDA**) claim to vary junior rates in the *Pharmacy Industry Award 2020* (**the PIA**).
2. I understand that the SDA seeks to vary the junior rates in PIA in the following way.

Age	Current % of Adult Rate Pharmacy Assistant Level 1 and 2 only	SDA % of Adult Rate Pharmacy Assistant Level 1 and 2 only
Under 16	45	
16	50	50
17	60	75
18	70	100
19	80	100
20	90	100

3. I have read the witness statement of B [REDACTED] (B [REDACTED]) signed 24 October 2024 and of K [REDACTED] (K [REDACTED]) signed 5 November 2024, filed in these proceedings.
4. This affidavit by me accurately sets out the evidence that I would be prepared, if necessary, to give to the Fair Work Commission. This affidavit is true and correct to the best of my knowledge and belief.

Personal Background

5. I am a pharmacist and a proprietor of Simply Pharmacy Toronto located at 42-44 The Boulevard TORONTO NSW 2283 (the **Toronto Pharmacy**).
6. I am also a proprietor of Simply Pharmacy Stockton located at 59 Mitchell Street STOCKTON NSW 2295 (the **Stockton Pharmacy**).
7. I am also a proprietor of Simply Pharmacy West Wallsend located at Withers Street and Carrington Street WEST WALLSEND NSW 2286 (the **West Wallsend Pharmacy**).
8. I am also a proprietor of Simply Pharmacy Ingleburn located at 9-10 Nardoo Street and Norfolk Street INGLEBURN NSW 2565 (the **Ingleburn Pharmacy**).
9. I have worked in community pharmacy as a Pharmacist since October 2003, having worked in pharmacies located in Auburn, Chester Hill, Rosemeadow and Rozelle.
10. I have also been an appointed Justice of the Peace for over 10 years.



11. I obtained a Bachelor of Pharmacy in 2002 and have been a registered a pharmacist since October 2003.

Pharmacy Details

12. The Toronto Pharmacy is open between 8.30 AM and 6 PM on weekdays, 8.30 AM to 4 PM on Saturday and 9 AM to 2 PM on Sunday.
13. The Stockton Pharmacy is open between 8.30 AM and 6 PM on weekdays, 9 AM to 12 PM on Saturday and is closed on Sunday.
14. The West Wallsend Pharmacy is open between 9 AM and 5:30 PM on weekdays, 9 AM to 12 PM on Saturday and is closed on Sunday.
15. The Ingleburn Pharmacy is open between 9 AM and 5:30 PM on weekdays, 9 AM to 12 PM on Saturday and is closed on Sunday.
16. During my career I have worked with and employed numerous junior employees.
17. I currently employ approximately 13 junior employees at the Toronto Pharmacy, no junior employees at the Stockton Pharmacy, 1 junior employee at the West Wallsend Pharmacy and 2 junior employees at the Ingleburn Pharmacy.
18. Of the 16 junior employees employed at all of my pharmacies, 11 are aged under 18 years old and 5 are aged between 18-20 years old.
19. Most junior employees are employed either part time or casually. Most of my current junior employees are high school students.

Why we employ juniors

20. We employ junior team members to assist with staffing our roster. Junior employees are available to work later shifts (after school) and on weekends when more senior staff are unlikely to be available. These shifts also tend to be during quieter trading hours which is more suited to junior employees as they do not require more experienced team members to manage the intensity of trade.
21. We employ junior employees as a means of giving local kids their first job and entrance into the workforce. It is my experience that 9 out of 10 junior employees that work with us have had no prior work experience.
22. There is also a cost element of why we employ junior employees. The shifts that they tend to be available for are during periods where penalty rates apply and so it is more cost effective to roster junior team members during these times so that we can have adequate staff coverage.

Working Hours

23. Junior employees tend to work after school shifts, on weekends and sometimes during school holidays.
24. On weekdays, junior team members usually work a 3 PM to 6 PM shift

25. On weekends, junior employees are usually given short-day shifts to allow them to attend team sports or other extra-curricular activities. These might be 9 AM to 12 PM but occasionally one junior team member may also work an 8.30 AM to 4 PM shift on Saturdays, and 9 AM to 2 PM shift on Sunday.
26. Ordinarily, we try to roster 2 junior employees on Saturday and 1 on Sunday but this fluctuates depending on the experience of the junior employees. For example, we do employ some pharmacy students who will be capable taking on more responsibility and so we roster them on weekends as they have more experience. These students, despite being junior employees, are paid as pharmacy students.
27. There are also junior employees who have a more limited scope, which impacts their roster. For example, we employ one 18 year old who works part-time but only works on the check out.
28. Junior employees tend to work these shifts because of education restraints. They are not available during the day on weekdays and university students are subject to their semester timetables.
29. There is difference in the availability between those over and under 18 years old but also a big difference between employees aged under 21 years old and older.
30. The availability of junior employees is also impacted by whether they are full time, part time or casuals.
31. There is also a variance in attitudes of junior employees towards working and this can be impacted by the employees education, family and overall work ethic. It is my experience that many have a lower desire to upskill or learn new concepts.
32. Generally speaking mature or more senior employees have a much greater commitment to their role than junior employees. In my experience, generally speaking, the younger the employee the less commitment they have towards attending work.
33. Junior employees generally have greater attendance and reliability issues than senior team members and are usually reliant on their parents in terms of transport and roster availability. It's often the parent of a junior employee that first makes the enquiry to see if we are hiring and parents will call to let us know the junior can't attend work or to talk about any work related matters.
34. The limitations above impact on the willingness to engage junior employees or roster them for shifts. In my view, pharmacy is both a business and a community service, which requires our team members to be present, caring and responsible in order for us to provide safe care to our communities. If a team member lets you down, and you are short staffed, there can be a higher risk of error and an overall impact on team harmony and productivity.
35. Junior team members generally have a much lower level of emotional intelligence as a result of having less life experience. This can mean that junior employees have less empathy and confidence than more mature members of staff. These traits are the core of pharmacy as a community and health service, which lowers the value of junior employees. In my experience, generally speaking, the younger the employee the lower the level of the emotional intelligence and the less life experiences.

36. As a result of having no/less life and work experience, junior employees also require a lot of one on one management and training to ensure they are aware of customers' needs and providing correct information to customers, which can limit their overall value.

Junior Scope of Duties

37. We employ junior team members to do certain duties after school hours, including general cleaning chores, stock fills, assisting with merchandise, sorting mail (incl. a mail run). Duties given to junior employees are generally tasks that do not require a high level of responsibility or any qualification, and also include staffing the checkouts.
38. On weekend shifts, junior employees would be doing stock fill, check out or cleaning duties.
39. We expect junior employees to actively offer customer assistance, asking customers if they need help on the pharmacy floor. However, lot of junior team members are hesitant to approach customers.
40. Some junior employees may assist with taking in a prescription or handing out prescribed medicines but this would only ever be under high level supervision from a senior team member/pharmacist.
41. Whilst it is increasingly rare to find, there are some junior employees who are incredibly switched on, smart, adaptive, and eager to upskill and show initiative. In these rare exceptions, we would train the relevant junior team member to take on more duties and responsibilities, but still with a much higher level of supervision than a senior team member would require.
42. Senior/mature employees would be expected to be involved in more supervisory and leadership tasks, including training others, as well as counselling customers, providing general advice on products and common health issues and first aid. These duties are not expected of junior team members because of a general lack of maturity, empathy and life experience increases the risk of error to our customers.
43. There is some variance, although not a lot, in the duties expected of junior team members. In my experience, whilst there would not be a great deal of variance between duties of junior employees, there would be a much greater divergence in performance. This variance can be because of many factors including the team members level of maturity, work experience and life skills, but in my experience generally speaking, the older the junior employee is the greater their productivity and performance is.

Supervision of Juniors

44. There is extra supervision required for junior employees. New junior team members undergo an orientation with a manager and are coupled with a senior team member for at least 3 weeks. All new team members undergo an orientation with a manager, however, the orientation for senior team members is only approximately 1 week.
45. After the initial 3 weeks, junior employees need to be kept close to senior team members so they can easily call for help when required.

46. All employees are offered ongoing training, and we conduct compulsory meetings and performance management (including formal check-ins/reviews every 6 months).
47. At least half of junior team members do not attend our monthly compulsory team meeting/training. This can be for various reasons including difficulty with arranging transport or school pressures (including assignments, exams etc.).
48. We do not intensely supervise our junior employees because we endeavour to restrict their scope of duties to be as light as possible. Any customer-facing tasks are undertaken with heavy supervision.

Training

49. Generally, junior employees take at least 2-3 years to be fully upskilled/trained. This means that once they turn 21 years old, they are better positioned work and assist the pharmacy. The learning curve of junior employees is definitely slower than for mature/senior team members and requires much more repetition.
50. We provide specific training for junior employees on pharmacy products and provide them with pharmacy fact sheets on general conditions. This might include going through what cold and flu medicine is, explaining what an antihistamine does and other general information. This training operates like a tutoring class and involves some homework for junior team members to complete.
51. This type of training is required for junior employees and not mature/senior employees because they simply don't have adequate pharmacy experience.
52. All staff are enrolled in monthly product training and other online courses. Some online courses reward employees who complete them with products or vouchers. As part of our maintaining our pharmacy accreditation, all staff are required to complete S2 and S3 training. Junior employees have to be pushed hard to complete the training, so we allocate time for them to complete the training during their shift, and they are remunerated for the training time. However, junior employees under the age of 16 are not required to complete the training

Retention / Turnover

53. There is a higher turnover of junior employees when compared to mature/senior team members.
54. It is my experience that young people have a very different work ethic than older generations and have a vastly different level of maturity.
55. Retention can also be impacted on the junior employees reliance on their employment as a source of income. Those who work full time or who rely completely on their employment to support themselves naturally have a lower turnover rate.
56. Pharmacy, like most first jobs, can be used by junior employees as a stepping stone towards their chosen careers for which they have completed training/study for.
57. Retention is better amongst junior employees who are also pharmacy students as their level of commitment is better than their peers.

If the Application was granted

58. If the SDA's application was granted, we would be less inclined to employ younger people. I would prefer to employ someone who has more work and life experience and capability than a younger person if their wage was the same.
59. We primarily employ young people because of their availability and so that we can train and upskill them. This training requires an investment from us that if junior rates increased we would be less inclined to commit to.
60. If the application was granted, we would be more inclined to hire more senior and experienced staff as they require less training, generally have better performance and we get better value from them.

Employment B [REDACTED]

61. In B [REDACTED] statement, where she refers to working as an HR Coordinator for the Simply Pharmacy Group, I respond as follows: B [REDACTED] was employed to work at my Simply Pharmacy stores. B [REDACTED] was not employed to work at the Simply Pharmacy stores owned by my brother. On three occasions, B [REDACTED] was as to assist at one of the Simply Pharmacy stores owned by brother, located at the Entrance NSW because there was a shortage of staff. She worked for us for approximately 4.5 months.
62. I had numerous staff issues and complaints to deal with resulting from B [REDACTED] conduct while she worked for me. I recall a particular junior employee who was not adequately performing her duties and she always missing from the counter. I said to B [REDACTED] that we needed to have a meeting with her to address the performance issues. B [REDACTED] did not want me to meet with the employee. B [REDACTED] told me that the employee had ADHD but that the employee just didn't know it and didn't have a diagnosis. B [REDACTED] and I ended up having a meeting with the employee, during which I found out that the employee thought I did not like her. I was shocked to hear this and informed the employee that I thought she was a valuable team member but that there were performance concerns that needed to be addressed. B [REDACTED] then bought the employee rings to fidget with so she could stay focussed on the register, the employee was highly offended. I was very concerned about B [REDACTED] lack of ability to read and understand people. The employee is still employed by me, and since B [REDACTED] has left, the employee has thrived in her role.
63. Employees regularly reported concerns that B [REDACTED] was in their face all the time encouraging them to raise issues about management and work conditions when they didn't have any to raise. It got to the stage that when I tried to speak to her about her duties as HR Coordinator and her role as a representative of the business, she shut me down and said that she was not here for the business but her role was to be on the employee's side.
64. B [REDACTED] wanted her mother to work with her and was actively trying to persuade me to hire her mother to replace pharmacy manager. I had real concerns about her objectivity.
65. I reject B [REDACTED] comment at paragraph 26 that recruitment in pharmacy has become challenging since the Covid 19 pandemic. Pharmacies remained open during the

pandemic and were then and continue to be attractive places to work, particularly for juniors. It is a safe, structured and protected work environment.

#SWORN #AFFIRMED

At [place]

On [date]

Signature of deponent

Name of witness

On [date]

Address of witness

Capacity of witness

[#Justice of the peace #Solicitor #Barrister #Commissioner
for affidavits #Notary-public]

And as a witness, I certify the following matters concerning the person who made this affidavit (the **deponent**):

- 1 #I saw the face of the deponent. [OR, delete whichever option is inapplicable]
 #I did not see the face of the deponent because the deponent was wearing a face covering, but I
 am satisfied that the deponent had a special justification for not removing the covering.[1]
- 2 #I have known the deponent for at least 12 months. [OR, delete whichever option is inapplicable]
 #I have confirmed the deponent's identity using the following identification document:

Signature of witness

Identification document relied on (may be original or certified copy)^[2]

[1] The only "special justification" for not removing a face covering is a legitimate medical reason.]

[2] "Identification documents" include current driver licence, proof of age card, Medicare card, credit card, Centrelink pension card, Veterans Affairs entitlement card, student identity card, citizenship certificate, birth certificate, passport or see Oaths Regulation 2011 or refer to the guidelines in the NSW Department of Attorney General and Justice's "Justices of the Peace Handbook" section 2.3 "Witnessing an affidavit" at the following address: <http://www.jp.nsw.gov.au/Documents/jp%20handbook%202014.pdf>]

IN THE FAIR WORK COMMISSION

**Application by the Shop, Distributive and Allied Employees Association Junior Rates
Pharmacy Industry Award 2020**

Matter No: AM2024/24

I, Vaneeta Kennedy, Pharmacist say on oath/affirm:

1. I make this affidavit in relation to the Shop Distributive and Allied Employees Association (**SDA**) claim to vary junior rates in the *Pharmacy Industry Award 2020 (the PIA)*.
2. I understand that the SDA seeks to vary the junior rates in PIA in the following way.

Age	Current % of Adult Rate Pharmacy Assistant Level 1 and 2 only	SDA % of Adult Rate Pharmacy Assistant Level 1 and 2 only
Under 16	45	
16	50	50
17	60	75
18	70	100
19	80	100
20	90	100

3. I have read the witness statement of B [REDACTED] signed 24 October 2024 and of K [REDACTED] signed 5 November 2024, filed in these proceedings.
4. This affidavit by me accurately sets out the evidence that I would be prepared, if necessary, to give to the Fair Work Commission. This affidavit is true and correct to the best of my knowledge and belief.

Personal Background

5. I am a pharmacist and a partner of:
 - a. TerryWhite Chemmart Bateau Bay located at Shop 75 Bateau Bay Square, The Entrance Road BATEAU BAY NSW 2261 (**TWC Bateau Bay**); and
 - b. Priceline Pharmacy Bateau Bay located at 11-15 Bateau Bay Square, The Entrance Road BATEAU BAY NSW 2261 (**Priceline Bateau Bay**).
6. I have worked in community pharmacy since I was a second year pharmacy student in 1993.
7. I obtained a Bachelor of Pharmacy in 1994 from the Sydney University and registered as a pharmacist during the end of 1995.

Pharmacy Details

8. TWC Bateau Bay is open between 9.00 AM and 6 PM Monday – Friday, 9.00 AM and 5 PM on Saturday and 10.00 AM to 4.00 PM on Sunday.



9. Priceline Bateau Bay is open between 8.30 AM and 5.30 PM on Monday – Wednesday and Friday, 8.30 AM to 7.00 PM on Thursday 9.00 AM and 5 PM on Saturday and 10.00 AM to 4.00 PM on Sunday.
10. During my career I have worked with an employed numerous junior employees.
11. I currently employ approximately 10 junior employees between TWC Bateau Bay and Priceline Bateau Bay.
12. Most of my junior employees are aged between 17 and 18 years of age and are mostly still in high school. Most junior employees in my team are employed casually.
13. I employ 2 full time junior employees who are currently completing their Certificates II/III in Community Pharmacy and are employed as trainees. When the junior undertaking the Certificate III training completes that qualification, she will move to the Level 3 classification under the PIA, and receive adult rates.

Why we employ juniors

14. We generally employ junior employees to perform simple/basic tasks that can be done with very little training. These might include taking out bins, wiping benches, general house keeping and basic serving customers at registers.
15. Employing junior team members helps us to accommodate older employees who are parents and are not available to work after school hours. This also allows us to have an appropriate balance of experience in our roster.

Working Hours

16. Junior employees generally work afternoon/evening shifts and on weekends.
17. Shifts are usually for 3 hours and most junior team members work 2-3 shifts per week, picking up more on school holidays.
18. Some junior employees work across both TWC Bateau Bay and Priceline Bateau Bay.
19. Junior employees work during these times because of their availability. These shifts don't clash with their schooling or university timetable.
20. At the back end of day, the tasks that are required for the pharmacies to operate are not difficult or particularly high value and so these shifts are more suited to junior team members. Afternoon and evening shifts consist mostly of serving customers, ticketing shelves, general cleaning and topping up displays (under supervision).
21. Junior employees more often than not have had no prior work experience and their first job is with us. This means they are learning and settling into having an employment arrangement, which can limit their value.
22. Junior employees are also experiencing a very formative time in their lives (finishing high school, starting university/their working life etc.). The pressures experienced by young people can impact on their reliability and commitment to their employment, which can in turn undermine their value and impact their training.

23. It has been my experience that employees under 20 years of age working at level 1 and level 2 under the PIA have a very different level of commitment to the workplace and their job compared to employees over 20..
24. The value and aptitude for training of junior employees does depend on the individual and in some parts on their commitment to ongoing employment in pharmacy and experience.
25. Pharmacy is not a regular retail environment and requires a level of product knowledge and emotional intelligence unique from most first jobs. Younger people and junior employees don't have the benefit of a lot of work or life experience and so they tend to have less compassion, empathy and emotional intelligence compared to older members of staff.
26. In my view, you cannot replace the benefit of work experience in a pharmacy. A great deal of work in pharmacy is experienced based and requires a level of knowledge and life experience that you simply do not have when you are young.
27. One of the key things that determines the value of an employee in my pharmacies is their ability to accept instruction and accept correction/feedback. Junior employees often have less of a capacity to accept constructive feedback than older employees. Some junior employees feel they are constantly getting things wrong and take feedback as criticism, which can undermine their ability to learn and contribute to the workplace. The best junior employees are those who can accept and learn from feedback.

Junior Scope of Duties

28. Junior employees tend to work mostly on registers. We restrict the functions available for staff working on registers (reserving refunds and other approval-based functions for senior staff) and so working on the registers is a simple duty for junior team members to take on.
29. Junior team members will also be involved in ticketing shelves, general cleaning and topping up displays (under supervision). If an order is already marked off (received) and sorted/split according to sections of the pharmacy, juniors might also put stock away. Junior team members will also be expected to fill up stock from drawers underneath the shelves in our pharmacy and have a general presence on the pharmacy floor so be able to assist/direct customer enquiries.
30. Older pharmacy assistants are expected to perform a similar scope but would be able to perform better and with less supervision. This generally comes down to the work and life experience of older employees who are better able to assist patients. For example, an older pharmacy assistant would be better equipped to handle patient enquiries and possess more product knowledge than junior employees as they have more experience in pharmacy products.
31. There is very little variance in the responsibility/scope of junior employees. We may allocate tasks based on a junior employees previous performance or capability. For example, junior employees who have a more sunny disposition will be allocated a more concierge role at the front of store or at a register to meet and greet customers

and help them locate items in the pharmacy. Junior employees who are more task driven might be assigned to assist more with putting away an order and filling up stock.

32. Full time junior employees might have some more responsible by reason of their experience in the pharmacy. They will work more hours and so have more experience to be able to take on additional duties.

Supervision of Juniors

33. Junior employees generally require more supervision than older employees. In my view, this largely comes down to junior employees not having any/much previous work experience. For example, we tend to need to micromanage the break times of junior employees to ensure that they are actually taken, which is not something you would need to do for an older employee.
34. We have to be very specific about the tasks junior employees are expected to complete on their own, or under supervision or not at all. We make it very clear to junior employees that any medication related query must be directed to the dispensary as junior employees do not have the experience, training or knowledge to be able to assist appropriately.
35. We always have a front of shop manager rostered in the pharmacy to oversee all staff and so that junior employees are never left without some level of supervision and managerial support.
36. We would ordinarily provide greater supervision in relation to cash handling to junior employees than older team members, especially in emphasising the importance of double checking your work (ensuring the correct change is provided etc.) and even closing the cash register when finished serving. These are usually things that would not be required to be explained to more mature members of staff.
37. Junior employees are also provided with task lists for their shifts so that there are clear expectations about what they need to achieve during their shift. This also adds a level of accountability so that juniors have to explain if/why any tasks could not be completed and assists with handover so that we know where a task progressed to.

Training

38. When junior employees are hired, we block out the first two hours of their first shift to for them to read and sign off on policies and procedures (QCPP related compliance policies, workplace health and safety, social media, leave policies etc.). Following this, junior team members are buddied up with another staff member and shown how to do basic tasks. After this, junior employees are given their own log in and allowed to serve customers under supervision. The length of time a junior employee is buddied up with another team member depends on the individuals level of confidence and performance.
39. Junior employees tend to require more workplace training at the start of their employment than older employees. They require more training that is not just about the job but how to manage and conduct yourself in the workplace.

40. We provide ongoing training, mostly online through TerryWhite Chemmart and Priceline's online modules. These might include some brand related training (loyalty clubs etc.) or more product related. We also allocate rostered time for people to complete a course or training (depend on the number of hours being worked – more hours usually means more training).
41. Product representatives will also come into the pharmacy and will do training with staff.
42. All ongoing training can be hit or miss with junior employees who can lack motivation to upskill. Some junior team members will be very enthusiastic and complete all available training, whilst others who have great attitude during their interviews might not put in the effort to learn once they have been hired.

Retention / Turnover

43. There is a difference in retention between junior and older employees. Pharmacies require a team who has the right attitude and want to care for people (that have a caring and nurturing side). The skills and knowledge required to work in a pharmacy can be taught but the right attitude to be able to be patient with customers and show warmth come with experience, both on the job and life experience.
44. This attitude is especially important when customers are concerned about their health, which requires a great deal of emotional intelligence to deal with appropriately and effectively.
45. There is such a depth of knowledge required to perform well as pharmacy assistant and it requires a lot of investment, time, and training to get it right. As such, we do what we can to retain all of our employees but junior team members naturally want to move on eventually.
46. There is an inherent risk that you take on when hiring a junior employee that after all the time spent training them, they will leave eventually. There are natural focal points in a junior employees life when this happens, including when they finish high school or university.

Employment of K [REDACTED] and B [REDACTED]

47. I became a partner in a pharmacy located Lake Haven Shopping Centre in 2002. At the time, it was an Amcal Pharmacy. We rebranded to Blooms the Chemist in 2003/04, then to TerryWhite Chemmart in 2009 and finally to Priceline Pharmacy in 2017 (the **Lake Haven Pharmacy**).
48. I sold the Lake Haven Pharmacy in March 2025.
49. At the time I became a partner in the Lake Haven Pharmacy, K [REDACTED] was already an employee.
50. I worked with K [REDACTED] very closely for a number of years at the Lake Haven Pharmacy.
51. In paragraph 3 of K [REDACTED] statement in these proceedings where she says that she worked in the Lake Haven Pharmacy for 27 years, I note that this was not a continuous period of employment. There was a period of approximately 3-4 years where K [REDACTED] was not employed at the Lake Haven Pharmacy, returning in September of 2007.

52. K [REDACTED] became a manager in the Lake Haven Pharmacy on 25 November 2012. As this was K [REDACTED] first management role, she was assigned shifts in our smaller pharmacy within the Lake Haven shopping centre.
53. In paragraph 3 of K [REDACTED] statement in these proceedings where she says that she was a manager in the Lake Haven Pharmacy for five years, I say that she resigned not long after being appointed a manager on 7 November 2014, only being a manager for just under 2 years.
54. K [REDACTED] resignation came after some turmoil within our team as a result of her promotion to a managerial position. There were quite a number of falling outs with the junior members of our team as K [REDACTED] management style was not consistent with the values of my business partner and I.
55. Prior to K [REDACTED] being appointed as a manager of the Lake Haven Pharmacy, she made several attempts to convince me and my business partner to hire her daughter, B [REDACTED].
56. K [REDACTED] permitted her daughter to 'volunteer'/work experience type work in the pharmacy for some time whilst B [REDACTED] after we initially declined to hire her in an attempt to persuade me and my business partner that B [REDACTED] could be useful in the pharmacy.
57. B [REDACTED] was hired in May 2010 and worked in the Lake Haven Pharmacy until November 2014.
58. At paragraph 8 of B [REDACTED] witness statement, where she says she was fortunate to have a lot of help from the assistant retail manager in her first job, I believe she is referring to her mother, K [REDACTED]. In my opinion her experience as a junior pharmacy assistant was very different to the more typical experience of other juniors because she worked alongside her mother.
59. In paragraphs 9 and 10 of B [REDACTED] statement in these proceedings where she indicates that she assisted at the dispensary counter, I say we would never allow B [REDACTED] near the dispensary and if she did perform tasks in this part of the pharmacy that this was never permitted by me or my business partner.
60. I do not recall and cannot locate any records of B [REDACTED] working in the dispensary in the Lake Haven Pharmacy.
61. It was a huge anomaly that we would employ anyone who was under the age of 16. The only reason that B [REDACTED] was hired when she was 13 years of age was because her mother was an employee and she undertook to closely supervise and monitor B [REDACTED].

If the Application was granted

62. If the SDA's application were granted, we would definitely be less inclined to employ junior team members.
63. If the application was granted, it will impact young people who employers will refrain from giving them a chance. We currently employ people who we have taken a risk in

hiring, those who weren't sure what they were going to do with themselves after finishing or dropping out of high school but we gave them a chance to show them that pharmacy could be a career for them. If junior rates were removed or changed, we would be less inclined to take this risk.

- 64. If junior rates change we will be less likely to employ a 19 year old who has no work experience compared to a 30 year old candidate who has an employment history and demonstrated a level of commitment and reliability.
- 65. We may also need to review our opening hours if the application were granted. We have already reduced our opening hours from 8 PM at both TWC Bateau Bay and Priceline Bateau Bay because of difficulty filling shifts later in the evening. If junior rates change, then we are less likely to hire junior team members who will be able to work these later shifts.

#SWORN #AFFIRMED

At [place] [REDACTED]

On [date] 15 JULY 2025

Signature of deponent [REDACTED]

Name of witness [REDACTED]

On [date] 15 JULY 2025

Address of witness [REDACTED]

Capacity of witness [#Justice of the peace #Solicitor #Barrister #Commissioner for affidavits #Notary public]

And as a witness, I certify the following matters concerning the person who made this affidavit (the **deponent**):

- 1 #I saw the face of the deponent. [OR, delete whichever option is inapplicable]
#I did not see the face of the deponent because the deponent was wearing a face covering, but I am satisfied that the deponent had a special justification for not removing the covering.[1]
- 2 #I have known the deponent for at least 12 months. [OR, delete whichever option is inapplicable]
#I have confirmed the deponent's identity using the following identification document:

Identification document relied on (may be original or certified copy)^[2]

Signature of witness [REDACTED]

[1] The only "special justification" for not removing a face covering is a legitimate medical reason.]

[2] "Identification documents" include current driver licence, proof of age card, Medicare card, credit card, Centrelink pension card, Veterans Affairs entitlement card, student identity card, citizenship certificate, birth certificate, passport or see [Oaths Regulation 2011](#) or refer to the guidelines in the NSW Department of Attorney General and Justice's "[Justices of the Peace Handbook](#)" section 2.3 "Witnessing an affidavit" at the following address: <http://www.jp.nsw.gov.au/Documents/jp%20handbook%202014.pdf>]