Australian Security Industry Association Limited

The peak body for security professionals

10 April 2016

The Hon IJK Ross,

President Fair Work Commission
11 Exhibition Street Melbourne VIC 3000

By email: chambers.ross.j@fwc.gov.au cc: amod@fwc.gov.au

Dear Justice Ross,

Re: AM 2016/15 - Plain Language Drafting Common Issue

The Australian Security Industry Association Limited (ASIAL) refers to the Fair Work Commission Statement dated 27 March 2017 ([2017] FWCFB 1638). At item 21 of the Statement the Fair Work Commission identifies awards to be included in the second tranche of awards to be re- drafted in plain language, including the Security Services Industry Award 2010 (SSI Award).

Item 21 of the Statement requests that "Interested persons are invited to comment on the selection of the second tranche of modern awards for re-draftng in plain language." ASIAL now takes the opportunity to make comment on the selection of the SSI Award for plain language drafting.

Currently the SSI Award is under going the process of the four yearly review of modern awards and substantive changes have been completed.

ASIAL supports the selection of the SSI Award to be considered in the second tranche of modern awards for re-drafting in plain language.

ASIAL agrees that where plain language re-drafting of award terms highlights ambiguity it may be desirable that the ambiguity be resolved, even if it results in a change to the legal effect of the award.

If you have any queries regarding this matter please contact Chris Delaney on 02 84254300 or ir@asial.com.au.

Yours Faithfully

Chris Delaney

Workplace Relations Advisor ASIAL

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