

7 April 2017

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

Leading Age Services Australia Ltd and Aged and Community Services Australia (as Aged Care Employers) thank the Fair Work Commission for the opportunity to provide comments on the selection of the second tranche of modern awards for re-drafting in plain language.

Our comments relate to the inclusion of the *Social, Community, Home Care and Disability Services Industry Award 2010* and *Aged Care Award 2010*.

We respectfully request the *Social, Community, Home Care and Disability Services Industry Award 2010* and *Aged Care Award 2010* be removed from the second tranche of awards selected for re-drafting, or in the alternative, that the process be postponed to a time subsequent to the conclusion of the four yearly review proceedings relevant to these awards.

Aged Care Employers have committed significant time and resources to the Exposure Draft process with the final versions yet to be published. We believe the outcome of the Exposure Draft process will result in greater clarity, less confusion and easier to read versions of both awards.

In addition to our engagement in reviewing the Exposure Drafts, we are also about to commit significant resources to the substantive matters applicable to all awards in our industry. We are also aware that a number of matters in the Common Issues proceedings will have direct application to our awards and require further commitment of time and resources to those matters.

We are concerned that while we are involved in matters currently underway we will be unable to provide the required resources and focus to the plain language re-drafting process.

In the interest of efficiency we respectfully suggest it more appropriate to consider plain language re-drafting of the above awards once final versions have been determined.

We have discussed our proposed approach with the Australian Industry Group, which also has an interest in the aforementioned awards. We understand that Ai Group supports our proposal.

Yours sincerely,

G. M. Liggins

Geoff Liggins
Manager, Employee Relations
Aged and Community Service Australia

Emma Patton

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Manager, Employment Relations
Leading Age Services Australia Ltd