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Branch President  
Ian Gair  
Branch Secretary  
Lyndal Ryan

1 June 2016  
Stefan Russell Uren  
Legal Officer

The Associate to Vice President Hatcher  
NSW Registry  
Level 8, 80 William St  
East Sydney  
NSW, 2011

Dear Associate,

**Four yearly review of modern awards –Part-time and casual employment common issue–  
AM2014/196 and 197 – Notices to produce**

1. We write regarding the attached draft orders requiring the production of documents in this matter.
2. On 24 April 2016 United Voice wrote to the representative of each witness requesting the informal provision of the documents sought in the schedules to each draft order. On 22 May 2016 Clubs Australia indicated on behalf of their members that each member was unprepared to provide all of those documents informally. We enclose our letter to Clubs Australia and their reply.
3. The documents sought are identified by categories and each category bears immediately on the issues in dispute.
4. The case put by Clubs Australia suffers runs on substantially the same basis as the case put by the Clubs Australia. The categories of documents sought are largely the same and United Voice repeats its submissions filed on 16 May 2016. United Voice has provided Clubs Australia with copies of those submissions.

Kind Regards

Stefan Russell Uren

*Legal Officer  
United Voice*

## **Form F52 Order Requiring Production of Documents etc. to the Fair Work Commission**

*Fair Work Act 2009, s.590(2)(c)*

*Fair Work Commission Rules 2013, Rule 54*

### **FAIR WORK COMMISSION**

**Commission Matter No.: AM196 and AM197**

**Applicant:**

United Voice (Applicant for an order to produce)

**First Respondent:**

*Richard David Ian Tait*

(First Respondent to an order to produce)

**Second Respondent:**

*The Registered Clubs Association of New South Wales*

(Second Respondent to an order to produce)

**TO:**

The Registered Clubs Association of New South Wales

Attention: Richard David Ian Tait

Level 8, 51 Druitt St, Sydney

Pursuant to s.590(2) of the *Fair Work Act 2009* you are **ORDERED** to provide to the Fair Work Commission the documents, records and other information specified in the Schedule to this order before the Fair Work Commission at the following time, date and place:

Time: 12:00

Date: 9 June 2016

Place: Level 10, Terrace Tower, 80 William Street, East Sydney, NSW, 2011.

Dated:

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Member of the Fair Work Commission

Note:

- This order has been issued at the request of United Voice
- You can apply to have this order set aside or varied.
- Instead of attending to provide the documents etc. covered by this order at the time and place specified above, you may produce them to an officer of the Commission at the place specified above not later than 4.00 pm on the day before the day mentioned above.
- If you have any queries in relation to this order please contact the associate to Vice President Hatcher on (02) 9 308 1812

## SCHEDULE

We draw your attention to the statement filed with the Fair Work Commission on your behalf by the Australian Hotels Association on 12 October 2015. The column on the left hand side of the following table identifies the paragraphs to which the documents on the right hand side of the table relate.

<b>1 Richard Ian David Tait, sworn 8 December 2014.</b>	
10,11, 12,22	Complete copies of the 2011 and 2007 'Club Census' conducted by KMPG.
25	Any documents, correspondence (including electronic), file note or record concerning the decision of the Orange Ex Services Clubs to shift its recruitment of staff from part time to casual employees.
27	Any document, correspondence (including electronic), file note or record arising out of or concerning in-house investigations into the current costs of casuals and part time employees.
30	Any documents or thing (including electronic records) used in the state wide seminar series noted herein.

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*Fair Work Act 2009, s.590(2)(c)*

*Fair Work Commission Rules 2013, Rule 54*

**FAIR WORK COMMISSION**

**Commission Matter No.: AM196 and AM197**

**Applicant:**

United Voice (Applicant for an order to produce)

**Third Respondent:**

*16ft Sailing Club Ltd*

(Respondent to an order to produce)

**Fourth Respondent:**

*Krystal Rees*

(Respondent to an order to produce)

**TO:**

Belmont 16ft Sailing Club Ltd

Attention: Krystal Rees

The Parade, Belmont, NSW

Pursuant to s.590(2) of the *Fair Work Act 2009* you are **ORDERED** to provide to the Fair Work Commission the documents, records and other information specified in the Schedule to this order before the Fair Work Commission at the following time, date and place:

Time:        12:00

Date:        9 June 2016

Place:       Level 10, Terrace Tower, 80 William Street, East Sydney, NSW, 2011.

Dated:

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We draw your attention to the statement filed with the Fair Work Commission on your behalf by the Australian Hotels Association on 12 October 2015. The column on the left hand side of the following table identifies the paragraphs to which the documents on the right hand side of the table relate.

<b>2 Krystal Rees, sworn 7 October 2015</b>	
2	In relation to the 87 casual employees noted, the commencement date of each casual employee, their role or position, and any indication of the nature of their tenure at the Club .  This material can be provided in summary form.
5, 8	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
5,	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
5,8	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
6	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
5,8,11	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
13	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.
6	Records showing the patronage of the Club for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
8,11	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).

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*Fair Work Commission Rules 2013, Rule 54*

**FAIR WORK COMMISSION**

**Commission Matter No.: AM196 and AM197**

**Applicant:**

United Voice (Applicant for an order to produce)

**Fifth Respondent:**

*Castle Hill RSL Club Ltd*

(Respondent to an order to produce)

**Sixth Respondent:**

*Brent Williams*

(Respondent to an order to produce)

**TO:**

Castle Hill RSL Club Ltd

Attention: Brent Williams

77 Castle St, Castle Hill, NSW, 2154

Pursuant to s.590(2) of the *Fair Work Act 2009* you are **ORDERED** to provide to the Fair Work Commission the documents, records and other information specified in the Schedule to this order before the Fair Work Commission at the following time, date and place:

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Date:        9 June 2016

Place:       Level 10, Terrace Tower, 80 William Street, East Sydney, NSW, 2011.

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We draw your attention to the statement filed with the Fair Work Commission on your behalf by the Australian Hotels Association on 12 October 2015. The column on the left hand side of the following table identifies the paragraphs to which the documents on the right hand side of the table relate.

<b>3 Brent Williams, sworn 7 October 2015</b>	
2	<p>Of the 530 employees noted as award reliant across the Castle Hill RSL Group, the number of which are permanent, part-time and casual employees and their commencement dates, their role or position, and any indication of the nature of their tenure at the Club.</p> <p>This material can be provided in summary form.</p>
5,6,7	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
5,6,7,1 1(a)&(c) )	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
6	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
6,7	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
14	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.
6	<p>Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis.</p> <p>This material can be provided in summary form.</p>
5,6,7,1 1(a)	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).

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**FAIR WORK COMMISSION**

**Commission Matter No.: AM196 and AM197**

**Applicant:**

United Voice (Applicant for an order to produce)

**Seventh Respondent:**

*Canterbury Hurlstone Park RSL Ltd*  
(Respondent to an order to produce)

**Eighth Respondent:**

*Paula La Rocca*  
(Respondent to an order to produce)

**TO:**

Canterbury Hurlstone Park RSL Ltd

Attention: Paula La Rocca

20-26 Canterbury Rd Hurlstone Park NSW 2193

Pursuant to s.590(2) of the *Fair Work Act 2009* you are **ORDERED** to provide to the Fair Work Commission the documents, records and other information specified in the Schedule to this order before the Fair Work Commission at the following time, date and place:

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Date:        9 June 2016

Place:       Level 10, Terrace Tower, 80 William Street, East Sydney, NSW, 2011.

Dated:

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### SCHEDULE

We draw your attention to the statement filed with the Fair Work Commission on your behalf by the Australian Hotels Association on 12 October 2015. The column on the left hand side of the following table identifies the paragraphs to which the documents on the right hand side of the table relate.

<b>4 Paula La Rocca, sworn 7 October 2015</b>	
2	Of the 220 employees noted, the number of which are permanent, part-time and casual employees and their commencement dates, their role or position, and any indication of the nature of their tenure at the Club.  This material can be provided in summary form.
5	A copy of the Canterbury Hurlstone Park RSL Club Employees Enterprise Agreement 2011-2015
7,8	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
7,8	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
7,8	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
10	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
8,9	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
16, 17, 18	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.
10	Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
8,9	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).
9	Any document reflecting or explaining the shift swap process implemented at the club.

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*Fair Work Act 2009, s.590(2)(c)*

*Fair Work Commission Rules 2013, Rule 54*

**FAIR WORK COMMISSION**

**Commission Matter No.: AM196 and AM197**

**Applicant:**

*United Voice* (Applicant for an order to produce)

**Ninth Respondent:**

*Carina Leagues Club Ltd*  
(Respondent to an order to produce)

**Tenth Respondent:**

*Michelle Best*  
(Respondent to an order to produce)

**TO:**

Carina Leagues Club Ltd

Attention: Michelle Best

1390 Creek Road, Carina, QLD, 4152

Pursuant to s.590(2) of the *Fair Work Act 2009* you are **ORDERED** to provide to the Fair Work Commission the documents, records and other information specified in the Schedule to this order before the Fair Work Commission at the following time, date and place:

Time:        12:00

Date:        9 June 2016

Place:       Level 10, Terrace Tower, 80 William Street, East Sydney, NSW, 2011.

Dated:

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Member of the Fair Work Commission

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### SCHEDULE

We draw your attention to the statement filed with the Fair Work Commission on your behalf by the Australian Hotels Association on 12 October 2015. The column on the left hand side of the following table identifies the paragraphs to which the documents on the right hand side of the table relate.

<b>12 Michelle Best, sworn 25 September 2015</b>	
3	<p>Of the 2 part time and 100 casual employees noted as employed, their commencement dates, their role or position, and any indication of the nature of their tenure at the Club .</p> <p>.</p> <p>As to staff employed '<i>back in 2012</i>' the number of permanent, part-time and casual employees and their commencement dates, their role or position, and any indication of the nature of their tenure at the Club .</p> <p>This material can be provided in summary form</p>
4,9,14	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
4,9,14	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
4,9,14, 15	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
9	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
5	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
9	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.
9	<p>Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis.</p> <p>This material can be provided in summary form.</p>
4,9,12, 14, 15	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).

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*Fair Work Act 2009, s.590(2)(c)*

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**FAIR WORK COMMISSION**

**Commission Matter No.: AM196 and AM197**

**Applicant:**

United Voice (Applicant for an order to produce)

**Eleventh Respondent:**

*Easts Leagues Club Ltd*

(Respondent to an order to produce)

**Twelfth Respondent:**

*Donna Foord*

(Respondent to an order to produce)

**TO:**

Easts Leagues Club Ltd

Attention: Donna Foord

40 Main Avenue, Coorparoo, Qld, 4151

Pursuant to s.590(2) of the *Fair Work Act 2009* you are **ORDERED** to provide to the Fair Work Commission the documents, records and other information specified in the Schedule to this order before the Fair Work Commission at the following time, date and place:

Time:        12:00

Date:        9 June 2016

Place:       Level 10, Terrace Tower, 80 William Street, East Sydney, NSW, 2011.

Dated:

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Member of the Fair Work Commission

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## SCHEDULE

We draw your attention to the statement filed with the Fair Work Commission on your behalf by the Australian Hotels Association on 12 October 2015. The column on the left hand side of the following table identifies the paragraphs to which the documents on the right hand side of the table relate.

<b>13 Doona Foord, sworn 30 September 2015</b>	
3	Of the 2 part-time and 79 casual employees, their commencement dates, their role or position, and any indication of the nature of their tenure at the Club.  This material can be provided in summary form
6,8,13, 15	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
6,8,13, 15	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
6,8,13, 15	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
4, 6, 10	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
6, 8	Any written correspondence from part time and casual employees to the employer relating to alterations to their roster (at their behest or that of the employer). This demonstrates the extent to which workers already agree to work additional or alternate hours.
	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.
4, 6, 10	Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
13, 15	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).
11	Any documents relating to the witnesses previous experience with lending institutions.

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*Fair Work Act 2009, s.590(2)(c)*

*Fair Work Commission Rules 2013, Rule 54*

**FAIR WORK COMMISSION**

**Commission Matter No.: AM196 and AM197**

**Applicant:**

United Voice (Applicant for an order to produce)

**Thirteenth Respondent:**

*Ingleburn RSL Sub-Branch Club Ltd*  
(Respondent to an order to produce)

**Fourteenth Respondent:**

*Alan Raymond Robinson*  
(Respondent to an order to produce)

**TO:**

Ingleburn RSL Sub-Branch Club Ltd

Attn: Alan Raymond Robinson

70 Chester Rd, Ingleburn, NSW, 2565

Pursuant to s.590(2) of the *Fair Work Act 2009* you are **ORDERED** to provide to the Fair Work Commission the documents, records and other information specified in the Schedule to this order before the Fair Work Commission at the following time, date and place:

Time:        12:00

Date:        9 June 2016

Place:       Level 10, Terrace Tower, 80 William Street, East Sydney, NSW, 2011.

Dated:

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Member of the Fair Work Commission

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## SCHEDULE

We draw your attention to the statement filed with the Fair Work Commission on your behalf by the Australian Hotels Association on 12 October 2015. The column on the left hand side of the following table identifies the paragraphs to which the documents on the right hand side of the table relate.

<b>14 Alan Raymond Robinson sworn 9 October 2015</b>	
3	Of the 14 part-time and 41 casual employees, their commencement dates, their role or position, and any indication of the nature of their tenure at the Club .  This material can be provided in summary form.
3,5	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
3,5	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
3,5	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
6,10	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
3,5	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
8	Any Annual Report showing the company's financial position for financial years, 2013/2014, 2014/2015 and 2015/2016.
6,10	Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
3,5	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).

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*Fair Work Act 2009, s.590(2)(c)*

*Fair Work Commission Rules 2013, Rule 54*

**FAIR WORK COMMISSION**

**Commission Matter No.: AM196 and AM197**

**Applicant:**

United Voice (Applicant for an order to produce)

**Fifteenth Respondent:**

*Ryde Eastwood Leagues Club Ltd*  
(Respondent to an order to produce)

**Sixteenth Respondent:**

*Joanne Luke*  
(Respondent to an order to produce)

**TO:**

Royal Hotels Australia Pty Ltd

Joanne Luke

117 Ryedale Rd, West Ryde, NSW, 2114

Pursuant to s.590(2) of the *Fair Work Act 2009* you are **ORDERED** to provide to the Fair Work Commission the documents, records and other information specified in the Schedule to this order before the Fair Work Commission at the following time, date and place:

Time:        12:00

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Place:       Level 10, Terrace Tower, 80 William Street, East Sydney, NSW, 2011.

Dated:

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Member of the Fair Work Commission

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## SCHEDULE

We draw your attention to the statement filed with the Fair Work Commission on your behalf by the Australian Hotels Association on 12 October 2015. The column on the left hand side of the following table identifies the paragraphs to which the documents on the right hand side of the table relate.

<b>15 Joanne Luke, sworn 6 October 2015</b>	
2	Of the 59 part-time and 97 casual employees, their commencement dates, their role or position, and any indication of the nature of their tenure at the Club .  This material can be provided in summary form.
7,8	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
7,8	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
7,8	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
10	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
10	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
11,12	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.
6, 10	Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
7,8	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).

**Form F52      Order Requiring Production of Documents etc. to the Fair Work Commission**

*Fair Work Act 2009, s.590(2)(c)*

*Fair Work Commission Rules 2013, Rule 54*

**FAIR WORK COMMISSION**

**Commission Matter No.: AM196 and AM197**

**Applicant:**

United Voice (Applicant for an order to produce)

**Seventeenth Respondent:**

*Revesby Workers' Club Ltd*

(Respondent to an order to produce)

**Eighteenth Respondent:**

*Scott Spicer*

(Respondent to an order to produce)

**TO:**

Revesby Workers' Club Ltd

Attention: Scott Spicer

2B Brett St, Revesby, NSW

Pursuant to s.590(2) of the *Fair Work Act 2009* you are **ORDERED** to provide to the Fair Work Commission the documents, records and other information specified in the Schedule to this order before the Fair Work Commission at the following time, date and place:

Time:        12:00

Date:        9 June 2016

Place:       Level 10, Terrace Tower, 80 William Street, East Sydney, NSW, 2011.

Dated:

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## SCHEDULE

We draw your attention to the statement filed with the Fair Work Commission on your behalf by the Australian Hotels Association on 12 October 2015. The column on the left hand side of the following table identifies the paragraphs to which the documents on the right hand side of the table relate.

<b>17 Scott Spicer, sworn 18 September 2015</b>	
	Of the 106 part-time and 162 casual employees, their commencement dates, their role or position, and any indication of the nature of their tenure at the Club .  This material can be provided in summary form.
3,5,10,11	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
3,5,10,11	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
3,5,10,11	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
12	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
3	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
10	Any advice, internal memorandum or record relating to the Club's obligations to alter its enterprise agreement in response to changes in the Award.
10,11	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.
12	Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
10,11	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).

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*Fair Work Commission Rules 2013, Rule 54*

**FAIR WORK COMMISSION**

**Commission Matter No.: AM196 and AM197**

**Applicant:**

United Voice (Applicant for an order to produce)

**Tenth Respondent:**

*St George Leagues Club Ltd*

(Respondent to an order to produce)

**Tenth Respondent:**

*Lisa Petrie*

(Respondent to an order to produce)

**TO:**

St George Leagues Club Ltd

Lisa Petrie

124 Princes Highway, Beverley Park, NSW 2217

Pursuant to s.590(2) of the *Fair Work Act 2009* you are **ORDERED** to provide to the Fair Work Commission the documents, records and other information specified in the Schedule to this order before the Fair Work Commission at the following time, date and place:

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Place:       Level 10, Terrace Tower, 80 William Street, East Sydney, NSW, 2011.

Dated:

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Member of the Fair Work Commission

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- This order has been issued at the request of United Voice
- You can apply to have this order set aside or varied.
- Instead of attending to provide the documents etc. covered by this order at the time and place specified above, you may produce them to an officer of the Commission at the place specified above not later than 4.00 pm on the day before the day mentioned above.
- If you have any queries in relation to this order please contact the associate to Vice President Hatcher on (02) 9 308 1812

## SCHEDULE

We draw your attention to the statement filed with the Fair Work Commission on your behalf by the Australian Hotels Association on 12 October 2015. The column on the left hand side of the following table identifies the paragraphs to which the documents on the right hand side of the table relate.

<b>19 Lisa Petrie, sworn 17 September 2015</b>	
5	Of the 41 part-time and 62 casual employees, their commencement dates, their role or position, and any indication of the nature of their tenure at the Club .  This material can be provided in summary form.
9	A copy of the original enterprise agreement and the current enterprise agreement covering the Club.
6,7,8,9	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
6,7,8,9	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
6,7,8,9	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
13	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
8,9,11	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
10,18	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.
13	Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
8	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).

**Form F52      Order Requiring Production of Documents etc. to the Fair Work Commission**

*Fair Work Act 2009, s.590(2)(c)*

*Fair Work Commission Rules 2013, Rule 54*

**FAIR WORK COMMISSION**

**Commission Matter No.: AM196 and AM197**

**Applicant:**

United Voice (Applicant for an order to produce)

**Eleventh Respondent:**

*Tweed Heads Bowls Club Ltd*

(Respondent to an order to produce)

**Twelfth Respondent:**

*Gerard Robinson*

(Respondent to an order to produce)

**TO:**

Tweed Heads Bowls Club Ltd

Gerard Robinson

Cnr Wharf & Florence St, Tweed Heads NSW 2485

Pursuant to s.590(2) of the *Fair Work Act 2009* you are **ORDERED** to provide to the Fair Work Commission the documents, records and other information specified in the Schedule to this order before the Fair Work Commission at the following time, date and place:

Time:        12:00

Date:        9 June 2016

Place:       Level 10, Terrace Tower, 80 William Street, East Sydney, NSW, 2011.

Dated:

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Member of the Fair Work Commission

Note:

- This order has been issued at the request of United Voice
- You can apply to have this order set aside or varied.
- Instead of attending to provide the documents etc. covered by this order at the time and place specified above, you may produce them to an officer of the Commission at the place specified above not later than 4.00 pm on the day before the day mentioned above.
- If you have any queries in relation to this order please contact the associate to Vice President Hatcher on (02) 9 308 1812

## SCHEDULE

We draw your attention to the statement filed with the Fair Work Commission on your behalf by the Australian Hotels Association on 12 October 2015. The column on the left hand side of the following table identifies the paragraphs to which the documents on the right hand side of the table relate.

<b>22 Gerard Robinson, sworn 7 October 2015</b>	
3	<p>Of the 25 part-time and 74 casual employees, their commencement dates, their role or position, and any indication of the nature of their tenure at the Club .</p> <p>This material can be provided in summary form.</p>
5,6,7,8	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
5,6,7,8	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
5,6,7,8, 15	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
8	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015. These documents demonstrate the extent of any business fluctuation for which additional labour is required. This contributes to the analysis of how much roster variation actually occurs.
6,7	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer). This demonstrates the extent to which workers already agree to work additional or alternate hours.
14	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.
8	<p>Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis.</p> <p>This material can be provided in summary form.</p>
7	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).
11	<p>A copy of the THBC Enterprise Agreement 2014-17.</p> <p>All documents, draft agreements and correspondence concerning the negotiation of the THBC Agreement 2014-17.</p>

**Form F52      Order Requiring Production of Documents etc. to the Fair Work Commission**

*Fair Work Act 2009, s.590(2)(c)*

*Fair Work Commission Rules 2013, Rule 54*

**FAIR WORK COMMISSION**

**Commission Matter No.: AM196 and AM197**

**Applicant:**

United Voice (Applicant for an order to produce)

**Thirteenth Respondent:**

*Hampton Bowls Club Inc*

(Respondent to an order to produce)

**Fourteenth Respondent:**

*Andrew Breedon Walton*

(Respondent to an order to produce)

**TO:**

Hampton Bowls Club Inc

Andrew Breedon Walton

Cnr Fewster and Earlsfeild Rds, Hampton

Pursuant to s.590(2) of the *Fair Work Act 2009* you are **ORDERED** to provide to the Fair Work Commission the documents, records and other information specified in the Schedule to this order before the Fair Work Commission at the following time, date and place:

Time:        12:00

Date:        9 June 2016

Place:       Level 10, Terrace Tower, 80 William Street, East Sydney, NSW, 2011.

Dated:

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Member of the Fair Work Commission

Note:

- This order has been issued at the request of United Voice
- You can apply to have this order set aside or varied.
- Instead of attending to provide the documents etc. covered by this order at the time and place specified above, you may produce them to an officer of the Commission at the place specified above not later than 4.00 pm on the day before the day mentioned above.
- If you have any queries in relation to this order please contact the associate to Vice President Hatcher on (02) 9 308 1812



## SCHEDULE

We draw your attention to the statement filed with the Fair Work Commission on your behalf by the Australian Hotels Association on 12 October 2015. The column on the left hand side of the following table identifies the paragraphs to which the documents on the right hand side of the table relate.

<b>22 Andrew Breeden Walton, sworn 15 October 2015</b>	
2	Of the 1 part-time and 7 casual employees, their commencement dates, their role or position, and any indication of the nature of their tenure at the Club .  This material can be provided in summary form.
4,7,8	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
4,7,8	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
4,7,8,1 7	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
4,13	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
7	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
17	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.
4,10,13	Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
8	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).



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Branch President  
Ian Gair  
Branch Secretary  
Lyndal Ryan

29 April 2016  
Stefan Russell Uren  
Legal Officer

Helen Caryannis  
Special Counsel  
Clubs Australia Industrial  
Level 8, 51 Druitt st  
Sydney NSW 2000

Dear Ms Caryannis

**Four yearly review of modern awards –Part-time and casual employment common issue– AM2014/196 and 197**

1. We refer to the affidavits filed on behalf of your client, the Clubs Australia, on 12 October 2015.

Request for Documents

2. We are writing to request copies of the material referred to in the affidavits filed by Clubs Australian Industrial. This material is necessary to enable us to understand the basis on which the witnesses make certain statements or assertions in their affidavits, and to ascertain which, if any, of these assertions need to be tested through cross-examination.
3. This request relates to affidavits 1-4,12-15,17,19,22&23 filed by your client on the date mentioned above.

Timing

4. We assume that there is no objection to providing us with the documents we have requested. If there is an objection to doing so, however, could you please let us know as soon as possible and no later than by close of business on **Friday 6 May2016**.
5. We would be grateful for the provision of copies of the relevant documents at your earliest convenience but in any event within 14 days of the date of this correspondence. Refusal or failure to do so will result in an application for orders from the Commission for production of the documents requested. This correspondence and any response made will be provided to the Commission in any

application for orders under section 590 of the *Fair Work Act* 2009.

6. We trust that there will not be difficulties complying with our request and the undersigned can be contacted on ph. 02 61201 203 or mobile 0478 729 215 to discuss any issues arising from this request.
- 7.

Kind Regards



Stefan Russell Uren

*Legal Officer*  
*United Voice*

### **Table 1: Affidavits 1-4,12-15,17,19,22&23 – Document Request**

Please note:

1. Requests are for the primary source records. Where appropriate summaries or other secondary sources produced by the maker of the statement can be supplied and we will accept answers set out in correspondence from the maker of the statement's legal representative.
2. The Award means the *Registered and Licensed Clubs Award 2010*.
3. Generally, the names of staff can be redacted although the employment status of the employee should be noted *i.e.* full time, part time or casual. This will save considerable time in cross examination.

<b>Para</b>	<b>Document Sought</b>
<b>1 Richard Ian David Tait, sworn 8 December 2014.</b>	
10,11, 12,22	Complete copies of the 2011 and 2007 'Club Census' conducted by KMPG.
25	Any documents, correspondence (including electronic), file note or record concerning the decision of the Orange Ex Services Clubs to shift its recruitment of staff from part time to casual employees.
27	Any document, correspondence (including electronic), file note or record arising out of or concerning in-house investigations into the current costs of casuals and part time employees.
30	Any documents or thing (including electronic records) used in the state wide seminar series noted herein.

<b>Para</b>	<b>Document Sought</b>
<b>2 Krystal Rees, sworn 7 October 2015</b>	
2	In relation to the 87 casual employees noted, the commencement date of each casual employee, their role or position, and any indication of the nature of their tenure at the Club .  This material can be provided in summary form.
5, 8	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
5,	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
5,8	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
6	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
5,8,11	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
13	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.
6	Records showing the patronage of the Club for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
8,11	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).
<b>3 Brent Williams, sworn 7 October 2015</b>	
2	Of the 530 employees noted as award reliant across the Castle Hill RSL Group, the number of which are permanent, part-time and casual employees and their commencement dates, their role or position, and any indication of the nature of their tenure at the Club.  This material can be provided in summary form.
5,6,7	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
5,6,7,1 1(a)&(c )	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
6	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
6,7	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
14	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.

<b>Para</b>	<b>Document Sought</b>
6	Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
5,6,7,1 1(a)	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).
<b>4 Paula La Rocca, sworn 7 October 2015</b>	
2	Of the 220 employees noted, the number of which are permanent, part-time and casual employees and their commencement dates, their role or position, and any indication of the nature of their tenure at the Club.  This material can be provided in summary form.
5	A copy of the Canterbury Hurlstone Park RSL Club Employees Enterprise Agreement 2011-2015
7,8	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
7,8	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
7,8	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
10	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
8,9	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
16, 17, 18	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.
10	Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
8,9	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).
9	Any document reflecting or explaining the shift swap process implemented at the club.
<b>12 Michelle Best, sworn 25 September 2015</b>	
3	Of the 2 part time and 100 casual employees noted as employed, their commencement dates, their role or position, and any indication of the nature of their tenure at the Club .  As to to staff employed ‘back in 2012’ the number of permanent, part-time and casual employees and their commencement dates, their role or position, and any indication of the nature of their tenure at the Club .  This material can be provided in summary form
4,9,14	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
4,9,14	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.

<b>Para</b>	<b>Document Sought</b>
4,9,14, 15	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
9	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
5	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
9	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.
9	Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
4,9,12, 14, 15	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).
<b>13 Doona Foord, sworn 30 September 2015</b>	
3	Of the 2 part-time and 79 casual employees, their commencement dates, their role or position, and any indication of the nature of their tenure at the Club.  This material can be provided in summary form
6,8,13, 15	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
6,8,13, 15	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
6,8,13, 15	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
4, 6, 10	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
6, 8	Any written correspondence from part time and casual employees to the employer relating to alterations to their roster (at their behest or that of the employer). This demonstrates the extent to which workers already agree to work additional or alternate hours.
	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.
4, 6, 10	Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
13, 15	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).
11	Any documents relating to the witnesses previous experience with lending institutions.
<b>14 Alan Raymond Robinsonsworn 9 October 2015</b>	

<b>Para</b>	<b>Document Sought</b>
3	Of the 14 part-time and 41 casual employees, their commencement dates, their role or position, and any indication of the nature of their tenure at the Club .  This material can be provided in summary form.
3,5	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
3,5	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
3,5	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
6,10	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
3,5	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
8	Any Annual Report showing the company's financial position for financial years, 2013/2014, 2014/2015 and 2015/2016.
6,10	Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
3,5	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).
<b>15 Joanne Luke, sworn 6 October 2015</b>	
2	Of the 59 part-time and 97 casual employees, their commencement dates, their role or position, and any indication of the nature of their tenure at the Club .  This material can be provided in summary form.
7,8	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
7,8	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
7,8	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
10	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
10	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
11,12	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.
6, 10	Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
7,8	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).
<b>17 Scott Spicer, sworn 18 September 2015</b>	

<b>Para</b>	<b>Document Sought</b>
	Of the 106 part-time and 162 casual employees, their commencement dates, their role or position, and any indication of the nature of their tenure at the Club .  This material can be provided in summary form.
3,5,10,11	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
3,5,10,11	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
3,5,10,11	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
12	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
3	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
10	Any advice, internal memorandum or record relating to the Club's obligations to alter its enterprise agreement in response to changes in the Award.
10,11	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.
12	Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
10,11	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).
<b>19 Lisa Petrie, sworn 17 September 2015</b>	
5	Of the 41 part-time and 62 casual employees, their commencement dates, their role or position, and any indication of the nature of their tenure at the Club .  This material can be provided in summary form.
9	A copy of the original enterprise agreement and the current enterprise agreement covering the Club.
6,7,8,9	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
6,7,8,9	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
6,7,8,9	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
13	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
8,9,11	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
10,18	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.



<b>Para</b>	<b>Document Sought</b>
13	Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
8	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).
<b>22 Gerard Robinson, sworn 7 October 2015</b>	
3	Of the 25 part-time and 74 casual employees, their commencement dates, their role or position, and any indication of the nature of their tenure at the Club .  This material can be provided in summary form.
5,6,7,8	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
5,6,7,8	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
5,6,7,8, 15	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.
8	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015. These documents demonstrate the extent of any business fluctuation for which additional labour is required. This contributes to the analysis of how much roster variation actually occurs.
6,7	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer). This demonstrates the extent to which workers already agree to work additional or alternate hours.
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8	Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
7	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).
11	A copy of the THBC Enterprise Agreement 2014-17.  All documents, draft agreements and correspondence concerning the negotiation of the THBC Agreement 2014-17.
<b>22 Andrew Breeden Walton, sworn 15 October 2015</b>	
2	Of the 1 part-time and 7 casual employees, their commencement dates, their role or position, and any indication of the nature of their tenure at the Club .  This material can be provided in summary form.
4,7,8	Rosters issued for the period January 2014 – January 2016 for all staff (including any alterations made after issue).
4,7,8	Pay summaries for the period January 2014 – January 2016 for all casuals and part time employees.
4,7,8,1 7	Timesheets filled out for all casuals and part time employees for the period of January 2014 – January 2016.

<b>Para</b>	<b>Document Sought</b>
4,13	Documents showing the particulars of any bookings made in relation to any event or function during 2014 and 2015.
7	Any written correspondence from part time employees to the employer relating to alterations to their roster (at their behest or that of the employer).
17	Annual financial statements for the Club for the financial years ending 30 June 2011, 30 June 2012, 30 June 2013, 30 June 2014 and 30 June 2015.
4,10,13	Records showing the patronage of the establishment for the period of January 2014 – January 2016 on a week by week, or if unavailable month by month basis. This material can be provided in summary form.
8	Documents showing any offer and acceptance of short notice shifts (shifts required after the issue of the roster).