16 September 2015

KINGSFORD
LEGAL CENTRE

Workplac Relation Inquiry
Productivit Commission
GP Bo 1428
Canberr AC 2601

KLC i communit lega centr tha ha bee providin lega advic an advocacy to people in need of legal assistance in the Randwick and Botany Local Government areas in Sydney since 1981. KLC provides general advice on a wide range of legal issues, and undertakes casework for clients, many of whom without our assistance would be unable to afford a lawyer I 2014, KLC provide 1725 advices an opene 27 ne cases.

KLC provides a specialist employment law service within our catchment area. KLC has acted for hundreds of clients in unfai dismissa conciliation an arbitrations, general protection complaint (particularl in relation to workplace rights and discrimination) at the Fair Work Commission (FWC). KLC regularly acts for clients in discrimination matters at the Australian Human Rights Commission (AHRC) and Anti-Discrimination Board NSW. KLC also provides advice on a wide-range of employment issues such as redundancy, disciplinary action, entitlements, and flexibl wor arrangements.

In addition to this work, KLC also undertakes law reform and policy work in areas where the operatio an effectivenes o th la coul be improved.

In 2014 KLC provided advice to 445 clients on employment law issues and 237 advices on discrimination matters (a substantial proportion of which related to discrimination in employment).

Of the clients that KLC advised in employment matters in 2014, 55% stated they earned $40,000 or less annually; 81% of clients stated that they earned less than $70,000 per annum. Of the 19% of clients earning over $70,000 the majority were at risk of losing their job or were about to commence a period of unpaid or low paid leave, such as parental leave.

60% of clients were not born in Australia, with many speaking little or no English. 5% of our clients identified as being either Aboriginal or Torres Strait Islander. 14% of clients had a disability.

As seen in the statistics above, KLC's employment clinic services a predominantly low income and vulnerable sector of the community. Our experience suggests that in many cases, the existing workplace relations framework does not adequately protect the most vulnerable members of society, in particular in relation to preventing unfair dismissals and ensurin employee receiv thei correc entitlements.

Draf Recommendatio 14.1

Draf Recommendation 14. – Sunda penalty rates tha are no par o overtime o shift wor shoul be set a Saturda rates fo the hospitality, entertainment, retail, restaurants an café industries.

Clien surve o Sunda penalt rates

KLC conducted a surve o ou client betwee 1 Augus 201 an 1 September 2015 We receive 3 responses O th respondents, 43 worke Sunday an received penalty rates O th respondent workin Sundays, 61 worke in industrie tha would be affecte b thi recommendation.

W aske th surve respondent whethe workin o Sunday ha an impac o thei life. Respondent identifie tim awa fro famil an friends a thei bigges concern:

- *Fas foo worker: a 1 an al o m friends meet u o Sundays - I mis ou on that Also, m famil d stuff together o Sunday an can' joi in Fo instance, my cousi i getting married next weekend a the Central Coast an can' go.*

- *Bar Manager: I have been working Sundays for over 11 years - in that time I have missed literally hundreds o famil events - soccer games, weddings, birthday parties, weekends away. I struggle to keep up friendships as most people meet up on weekends. Generally, jus miss ou o hangin ou wit m wife an children.*

- *Entertainment industry worker: I feel I often miss out on friends & family members' birthdays, baby showers, christenings & events. My partner works some weekends also so often we get only one day a month or every 2nd month to spend together. Thi does strain ou relationship.*

- *Waiter: I have less time to spend wit friends. Working on Sundays affects wha get t d o Saturda night.*

- *Barista have less time t be social Thi makes me feel left out.*

We asked what the impact of reduced penalty rates would be on the respondents who worke Sundays, an receive th following responses:

- *M parents ar lo income earners - I started workin a soo a coul s tha can earn the money for extra things I need like a good computer. If I lose Sunday rates I will have to pick up another shift during the week (I only earn $10 an hour) - which wil badl effect m studies.*

- *[It would have a] devastating impact. I earn minimum wage - Sunday penalty rates have helped me to purchase a house in Sydney - loss of them ma mean wil have to sell i - I mos definitely will struggle t pa m mortgage.*

- *Penalty rates help t balance the budget fo famil with children.*

- *It would not be worth it for me to work Sundays if I was earning the same rate as a weekday. I would try to work longer hours during the week so that I would not miss ou o time wit m partner, famil friends o the weekends.*

- *wouldn't wor i there were n penalty rates o Sunday.*

We asked respondents if they would have to look for other work to supplement their incom i Sunda penalt rate wer reduced:

- *I would try, but I don't think I would find one - Not much point as a young person cause there aren't a lot of different types of work for us beyond retail and that are the industries you ar goin t cu the penalty rates for.*

- *woul try, bu a i m 50s, m jo prospects are very limited.*

- *I would try to get other work, but I don't think it is likely I would be able to find other work.*

- *No, woul jus sto workin Sundays.*

Our vie o draf recommendatio 14.1

KLC strongl oppose draf recommendatio 14.1 Traditionally, Sunday hav been viewed a da o rest, t spen tim wit famil an friends penalty rat fo workin Sundays reflect th impac workin Sunday ha o socia an famil life.

Additionally, removin Sunda rate only i certain industrie create two-tiered system. W not tha worker i th hospitality, entertainment, retail, restauran an café industrie ar i lowe pai wor tha man othe professions Worker i thes professions ar ofte unabl t secur alternativ employment Th characterisation o worker in thes industrie a 'transient' ma b misleading, a man worker i thes industrie have remaine wit th sam employe fo man years, an older worker i particular ma face difficult changin jobs hig proportio o employees i these industries ar female The recommendatio fail t conside th disproportionate impac reducin penalt rates will hav o women.

Penalt rate o Sunday ofte mea th differenc fo these worker in being abl to affor necessitie suc a rent, grocerie an electricity Referrin t othe 'policy solutions' suc a socia securit whe discussin penalt rate fail t recognis th importanc o the inheren dignit associate wit bein gainfull employed I ha lon bee recognised that participatio i th workforc i centra t sens o self-worth an well-being.

Increase deman fo weeken service mean tha businesses tha choos t trad on Sunday rea accompanyin profit. Reducing penalt rates fo employee wh enable businesse t increas revenu fail t reflec th sacrifice mad b thes employees In practice, worker ar ofte no presente wit a choice o workin Sunday – many workers ar hire i thes industrie o th basi tha the wil wor weekends.

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Draft recommendation 3.5 – The Australian Government should require that the Fair Work Commission publish more detailed information about conciliation outcomes and processes. In the medium term, it should also commission an independent performance review of the Fair Work Commission's conciliation processes, and the outcomes that result from these processes.

KLC supports draft recommendation 3.5. Currently, only limited information is available on Unfair Dismissal and General Protection conciliations at the FWC. Processes of conciliation can differ greatly, particularly in General Protections conferences when run by FWC Commissioners as opposed to staff conciliators. More information about conciliation processe ma increas consistenc acros conciliations.

We suggest that the FWC should make available statistics on outcomes of conciliations, and types of settlements reached. For example, the Australian Human Rights Commission publishes a conciliation register, which provides information on the circumstances of matter an outcome reache i de-identified manner[1] W sugges tha th FWC publish a similar conciliation register. This would assist Applicants and Respondents to gauge possibl conciliatio outcome an bette prepar fo conciliation.

[1] Australian Human Rights Commission conciliation register, available at https://www.humanrights.gov.au/complaints/conciliation-register

The FWC should also actively seek feedback from applicant and respondent parties' on their experience o conciliatio an mak th result publicl availabl i de-identified manner. For example, sending out an electronic survey after conciliation to both parties or their legal representatives could enable the gathering of this information. This data could be used to identify any systemic issues in conciliation and to monitor conciliation outcomes. This feedback should be reviewed regularly to improve conciliation practices and feedback provide t individua conciliator abou th ho participants vie th process.

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Tha the FWC establish conciliatio register.

That the FWC actively seek feedback from parties and their representatives about their experiences o conciliation and incorporate thi feedback int FW processes.

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Informatio request view o change t lodgemen fee fo unfair dismissa claims

KLC ha significan concern abou th impac a increas i lodgemen fees will have on restrictin acces t unfai dismissa remedie fo applicants. Lodgemen fee shoul no be increased.

For most lo an middle-income people, lodgemen fee act as barrie to access to justice A increas i th lodgemen fe fo a unfai dismissa clai i likel t resul in potentia applicants, particularly vulnerabl workers, no longer being able to mak claim an challeng th circumstance o thei dismissal. W are particularly concerne lo paid employee i industrie wher practice d no compl wit th la wil no challeng their dismissal, allowin suc practice t continu t flourish I i ou experience tha vulnerable employee tha hav potentia unfai dismissa claim als often hav significant entitlement claims Pu simpl i employee ar no bein paid th minimu wage any increas i lodgemen fee wil increas thei inability t challeng their dismissal and unlawfu practice wil continue.

Employee wh ar dismisse usuall fac grea financia strain an uncertaint a t their income. Applicants wh hav recently experience dismissa an hav ye t fin new employmen ofte struggl t pa fo basi necessities suc a groceries, electricit and rent Any increase t applicatio fee ma ac a disincentiv t applicants t lodg their claims

Although applicants ma appl fo fe waiver b filling ou FWC form, thi for i long, require extensiv financia detail, an i ofte difficul t complet fo applicant without acces t th interne o thos applicant wh hav limite English. Employees ofte d not hav tim t complet thi for wit th tigh 2 da deadlin a wel a thei application form.

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Tha the lodgement fee fo unfai dismissa claim shoul no be increased.

Draf Recommendatio 5.1

Draft Recommendation 5.1 The Australian Government should either provide the FWC with greater discretion to consider unfair dismissal applications 'on the papers' prior to commencement of conciliation; or alternatively, introduce more merit focused conciliation processes.

1) Peopl d no ge lega advic before lodging claims

KLC strongly opposes draft recommendation 5.1. Unfair dismissal law is complex, and applicants often have little or no understanding of how to best frame their unfair dismissal claims. The 21 day time limit for lodging applications and minimum employment periods alread pose significan barrier t applicants bringing an unfair dismissal claim. The limited availability of free legal assistance in employment law often means that applicants are unable to get legal advice before lodging an unfair dismissal claim. This means that although applicants may have a strong case, they may be unable to frame their claim under the law. I ou view, an additiona restriction t lodgin unfair dismissal claim i unjustified.

In our view, any process which determines applications 'on the papers' will discriminate against vulnerable and marginalised workers who face the largest barriers completing the forms. Many migrant workers, people with limited English proficiency, people who cannot read or write or have very low literacy and people with a disability find it difficult to complete the forms and will often be unable to best frame their application with reference to the law. In our experience, these workers are the most susceptible to exploitation by employers and unfair dismissal. Any decision 'on the papers' would likely impose significant disadvantage o thes vulnerabl persons, and woul effectively restrict thei righ t bring an unfair dismissal claim and access remedies. This would result in unfair dismissal operating only as a remedy for people who are able to navigate the system, rather than as a way of protecting vulnerable workers from unlawful and unfair practices. This would potentially move many types of industries where we know workers are routinely dismissed fo attemptin t enforc thei right fro the scrutin o th FWC.

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Annie worked as a cleaner in a hotel for over 5 years. Annie speaks Bahasa, and cannot speak much English. One day, Annie's boss fired her, without giving her a reason. She had no ha an performance issues i the role.

Annie did not know her rights as an employee. It was only when a community worker told her that she might have an unfair dismissal claim that Annie sought legal advice. She called her local community legal centre to get advice, but they were booked out for the next two weeks. They told her about the 21 day time limit and she lodged a form before getting legal advice. When Annie saw the lawyer with a interpreter, the lawyer explained to her that she thought Annie had stron case, but tha Annie's applicatio for wa no detailed enough, and did not make clear why the dismissal was unfair. The lawyer helped Annie amend her application, an Annie go written reference an compensation a the conciliation.

2) Conciliatio conference facilitat resolutions

Conciliation is a form of alternative dispute resolution, aimed at encouraging discussion between the parties in order to reach an agreement. The success of any conciliation is normally dependent on the willingness of the parties to negotiate and settle. In our experience, whether an unfair dismissal claim has merit is a key factor in the existing unfair dismissal conciliation processes. FWC conciliators will provide information on what unfair dismissal is under the law, allowing parties to self-assess the merits of their case. Additionally, in conciliation, parties may discuss what their views are on the merits of the matter. The merit of the matter informs any offers and counter-offers made by the parties, and whether any settlement is reached at conciliation. If a Respondent party does not believ tha a unfai dismissa clai ha merit, the ma discus thi a the conciliation.

Any additional change to conciliation processes is likely to decrease the efficiency of the process, an subjec th partie t additiona lega cost an delay.

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Tha draf recommendation 5. no be implemented.

If draft recommendation 5.1 is implemented, there should be an accompanying increase in the funding t the legal assistance sector i order t ensure each applican ha access t free legal advice t allo them t properly frame their unfai dismissa claim.

Draft Recommendatio 5.2

Draft Recommendation 5.2 – The Government should change the penalty regime for unfair dismissal cases so that an employee can only receive compensation when they have been dismissed without reasonable evidence of persistent underperformance or serious misconduct, procedural errors by an employer should not result in reinstatement or compensation by a former employee, but can, at the discretion of the FWC, lead to either counselling an education o the employer, o financial penalties.

Strong unfair dismissal laws are required to ensure the rights of employees to fair treatment, and to addres th power imbalance i th employer-employee relationship. The impact of unfair dismissal on employees is significant. Many of our clients who have been unfairly dismissed suffer financial, psychological and family stress as a result of losing their job. Employees we see who have been unfairly dismissed face problems maintaining their housing, fall into credit card debt and struggle to meet essential expenses. Often the remedies available through unfair dismissal do not adequately reflect the devastating effect of unfair dismissal on employees. It can take employees a significant amount of time to recove thei positio followin a unfair dismissal.

I ou experience, th unfai dismissa law d no impose hig regulator burde on employers for the followin reasons:

- th 2 wee ca o compensation, an compensatio onl fo economi los and no damage mean tha settlemen amounts are generall low;

- i man cases, ou client reques non-economic remedie t settl unfai dismissal matters, includin a apolog o statemen o service which help the fin new wor an lessen th impac o th econom an socia securit system
- the smal busines fai dismissa cod provides a broa exemptio fo small businesse fro unfai dismissa laws;
- th stric enforcemen o th 2 da tim limi fo lodgemen promotes speedy resolutio an a matte o practicalit reduce th numbe of application made;
- th la place clea obligation o employee t mitigat their losse b lookin for ne work, an failur t mitigat impact o abilit t recove mone i any action;
- th eligibilit criteri fo makin a unfai dismissa application strictl limit the availabilit o thi actio t employees and
- th majorit o unfai dismissa matter settl a conciliation a th FWC, whic i a fre proces an wher employer ca appea withou lega representation.[2]

Procedural fairness is a central tenet of the law, and in employment law, recognises the inheren power imbalance that exists between employer and employees. Employer have a responsibility to understand their obligations under industrial relations laws and have the resources available to do so. There is an abundance of publicly available material for employers on their legal obligations in relation to the hiring and dismissal of employees. If an employer fails to adhere to procedural requirements in dismissing an employee, this can compoun the harsh, unjus o unreasonabl natur o th dismissal.

Even if an employee has engaged in serious misconduct, if they were not dismissed in accordance with procedural requirements, they should retain a right to lodge a claim. In our experience, a small procedural error in itself will not lead to a weak unfair dismissal claim succeeding. Procedural errors need to be significant and go to issues such as unfairness to provide a basis for a claim under the law. KLC does not view serous misconduct dismissals based on minor procedural errors as being strong cases with merit. Unfair dismissal law is based on taking a holistic view of the circumstances surrounding the dismissal, including the validity of reasons for dismissal, any performance issues, the applicant's conduct, and the process by which the applicant was dismissed. Removing the procedural element removes the disincentive for employers to obey workplace laws and fails to keep a proper balance in term o th employee's righ t procedura fairness.

We also note that in our experience, unscrupulous employers have dismissed employees without a valid reason by claiming serious misconduct has occurred. Any removal of protection fo employee i thi are i likel t resul i unjust outcomes.

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Tim worked as a personal assistant for a small business employer for 3 years. He conducted work phone calls on his personal mobile, with a verbal agreement that the company would pa hi phone bil wit the compan credit card.

[2] 79% of unfair dismissal matters settle at conciliation at the Fair Work Commission – see Fair Work Commission, *Annual Report 2013-2014*, accessed at https://www.fwc.gov.au/documents/documents/annual_reports/fwc-ar-2014-web.pdf

One day when he went into work, Tim was told he was dismissed for serious misconduct for using the company credit card to pay his phone bill. The company alleged Tim had obtained financia advantage by dishonestly usin the company credit car fo personal expenses. Tim wa very upset a he had followed direction based o the agreement fo the company t pay hi phone bill.

Tim lodged an unfair dismissal complaint, and was represented by KLC at the conciliation. We successfully argued that Tim did not engage in serious misconduct and a settlement was reached.

Draf Recommendatio 5.3

Draft Recommendation 5.3 - The Australian Government should remove the emphasis on reinstatement as the primary goal of the unfair dismissal provisions under the Fair Work Act 200 (Cth).

In our experience, many of our clients do not want reinstatement, due to a breakdown of employment relationship. However, for vulnerable applicants who are suffering great financial strain and have difficulty finding new work, reinstatement should be an available remedy in unfair dismissal matters. This reflects the economic importance of keeping applicants in employment. In reality, reinstatement is only ordered where it is practicable in the circumstances and is a viable option especially with very large employers where redeploymen i practicabl solution.

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Mei worked part-time as a customer service representative at a store. She was a single mother with a disabled daughter, and experienced great financial difficulty when she was dismissed without a valid reason due to a personality clash between her and her new manager. Mei needed a job close to home in order to care for her daughter. Her former employment had suited her needs, as she worked part time and was close to home. Mei wanted reinstatement a she felt she wa unlikely t fin comparable employment.

Draf Recommendatio 5.4

Draft Recommendation 5.4 – Conditional on implementation of the other recommended changes to the unfair dismissal system within this report, the Australian Government should remove the reliance on the Small Business Fair Dismissal Code within the Fair Work Ac 2009 (Cth).

Th smal busines fai dismissa cod offer broa exemption to small businesse from unfai dismissa laws, ofte t th detrimen o employee wh woul otherwis be successfu i a unfai dismissa action Ou vie i tha th smal busines fai dismissal cod shoul b removed regardles o whethe th othe recommended change i the repor ar implemented.

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That draft recommendation 5.4 be implemented. This removal should not be contingent on other recommended changes t the unfai dismissa system withi thi report being adopted.

Draf Recommendatio 6.2

The Australian Government should modify section 341 of the Fair Work Act 2009 (Cth). The FW Act should also require that complaints be made in good faith; and that the Fair Work Commission must decide this via a preliminary interview with the complainant before action ca proceed an prio t the convening o an conference involvin bot parties.

KLC opposes draft recommendation 6.2, as it imposes an additional burden on applicants and restricts access to the FWC. We note there is no accompanying requirement on employers to provide responses to applications in good faith. To our knowledge, no other jurisdiction poses such a requirement on applicants. It is unclear what criteria would be applied to assess whether the complaint is being made in good faith, and whether this decision would be open to appeal. Venturing into assessment of claims prior to conference conflicts with the aims of alternative dispute resolution procedures, which are not based on determinations, but on the parties resolving the matter through agreement. The FWC interviewing applicants before the convening of a conference will inevitably result in reduced efficiencies and delay in resolving matters. The time and resources used in assessing whether applications are made in good faith would be better used in convening conciliations.

We are also concerned that vulnerable workers, or workers without access to appropriate legal advice may not frame their claim strongly, or could focus on the wrong issues, raising an issue as to whether the application is made in good faith. It places an additional barrier to accessing a resolution mechanism for applicants which may deter them from pursuing an clai eve i i ha merit.

In our experience, applicants do make complaints in good faith. We do not represent applicants in matters without merit.

Draf Recommendatio 6.3

Draft Recommendation 6.3 – Part 3-1 of the Fair Work Act be amended to introduce exclusions fo complaint tha are vexatious and frivolous

KLC's view is that this is unnecessary, particularly at the conference stage of the process. Th Fai Wor Ac alread ha cost provision i place Fo example, section 375 o th Act already provides the FWC with the power to make costs orders against parties in general protections disputes if the party has made an unreasonable act or omission. Section 376 of the Act enables the FWC to make cost orders against lawyers or paid agents who pursue general protections dismissal and general protections non-dismissal disputes which have no reasonabl prospect o success.

Sectio 57 o th Ac enable th Court t dea wit vexatiou complaints raised unde the Act through the power to impose costs orders. In general protections claims, unless the matter proceeds to a consent arbitration, the FWC does not decide whether or not a breach of general protections has occurred. Determining whether a complaint is vexatious or frivolous before a hearing is likely to be difficult, in the absence of evidence, submissions, legal arguments and perhaps legal representation. Our view is that should this

recommendation be adopted, it should only apply to the arbitration stage of proceedings at th FWC, no t conferences.

Additionally, we note that the risks of costs often acts as a disincentive to applicants pursuing meritorious matters.

Draf Recommendatio 6.4

Draft Recommendation 6.4 – The Australian Government should introduce a cap on compensation fo claims lodged under Par 3-1 o the Fair Work Act 2009 (Cth)

We believe that the absence of compensation caps for matters under Part 3-1 of the Fair Work Act is appropriate. Employees who have been subject to unlawful behaviour such as discrimination and dismissal for temporary absence often face ongoing distress, hurt and humiliation as a result of this behaviour, which is reflected in the current uncapped jurisdiction. This is also consistent with the operation of discrimination provisions in the federa jurisdiction, an thi consistenc shoul b maintained.

The judiciary has taken a restrained approach to the award of damages in general protection matters. Wher an applican is awarde compensatio amounts, these amounts are generally low and represent both economic loss and damages, calculated in a reasonabl an fai manner.

In our experience, applicants deciding between unfair dismissal and general protections claims do not base their decision of choice of claim on available compensation, but rather whethe thei cas fall mor clearl withi on o thes areas.

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Draf Recommendatio 21.1

Draft Recommendation 21.1 – The FWO should be given additional resources for investigation an audi o employers suspected o underpaying migran workers.
The Migration Act should be amended so that employers can be fined by at least the value of any unpaid wages and conditions to migrants working in breach of the Migration Act, in additio t the existing penalties under the Act.

KLC recognise th importance o th Fai Wor Ombudsma (FWO i th workplace relation system W suppor th recommendatio tha th FW be give additional resource i relatio t migran workers However, w believ tha thi extr resourcing shoul no b limite t migrant workers, bu applie mor broadly, t enabl th FW to provid complainant wit substantiv assistance to resolv thos complaints

In all cases where we have advised clients to complain to the FWO about significant underpayments and not being provided with payslips, and the FWO has conducted an investigation and established that a debt to the employee exists, the FWO has declined to take any enforcement action. Even when numerous clients working for the same employer have complained to the FWO about unlawful practices, the FWO has declined to exercise its prosecution function. Legal assistance services such as community legal centres are not

adequately resourced to be able to take on these cases. The result of this is that some employers continue to flaunt Fair Work laws and Awards as they believe that none of their staf wil tak the t court.

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Sam worked a a baker, often working night shifts. Sam could only speak a little English s it was difficult for him to find a job. He began working as a baker 8 years ago and was paid onl $1 a hou fo the entire period. Sa supervised an trained other staff, but wa never paid allowances for this. Sometimes Sam was paid in cash, and sometimes he was paid via transfer t hi ban account.

One day, Sam was talking to his friends about his job. They told him he should probably be earning more than $14 an hour. Sam lodged a complaint with the Fair Work Ombudsman. Preliminary calculations indicated Sam was underpaid by over $150 000. The Fair Work Ombudsma di not pursue the matter, saying tha i wa u t Sa to take his employer to court. Sam was unable to do this as he cannot speak English, couldn't understand the court process an couldn't affor lawyer.

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That the FWO be adequately resourced such that in can exercise its enforcement and prosecution functions more frequently.

A major obstacle to migrant workers complaining about unlawful treatment by employers is their visa conditions. Many migrant workers are forced by employers to work in hours excess of what is permitted under the visa conditions. Workers can face penalties under the *Migration Act 1958* (Cth) for breaching visa conditions, which means they are unlikely to raise complaints about employer's breaches of workplace laws with the FWO. This enables exploitative employers to breach the law without fear of being brought to the attention of regulator bodie suc a th FWO.

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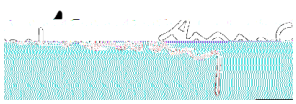
That the Australian Government provide an amnesty to migrant workers who report Employers i breach o the Fai Wor Ac 200 (Cth), enterprise agreements an Awards

Pleas contac u o (02 938 956 i yo woul lik t discuss ou submissio further.

Your faithfully,
KINGSFORD LEGA CENTRE



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