

## IN THE FAIR WORK COMMISSION

### Matter No:

AM2014/197 and AM2014/196

### Matter:

4 Year Modern Award Review

*Social, Community, Home Care and Disability Services Industry Award 2010*

*Aged Care Award 2010*

*Nurses Award 2010*

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### St Ives Group Pty Ltd - Submissions

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#### MODERN AWARDS OBJECTIVE

1. The *Fair Work Act 2009* (Cth) (**FW Act**) sets out the modern awards objectives in section 134(1).
2. Amongst other things, the modern awards objectives provide that the Fair Work Commission (**FWC**) must ensure that modern awards:
  - (a) provide a '*fair and relevant minimum safety net*';
  - (b) promote flexible modern work practices;
  - (c) promote social inclusion through increased workforce participation; and
  - (d) take into account the likely impact of the Modern Award on business, including employment costs.
3. Modern awards are intended to be simple to apply, easy to understand, economically sustainable and reduce the regulatory burden on employers: *Modern awards request, Minister for Employment and Workplace Relations, 28 March 2008*.
4. When varying a modern award, the FWC must be satisfied that the proposed variation is necessary to achieve the modern awards objective, rather than simply desirable: *Shop, Distributive and Allied Employees Association v National Retail Association (No 2) (SDA v NRA (No 2))* (2012) 205 FCR 227; 219 IR 382 at [46].

## OBJECTIVE OF THE 4 YEAR REVIEW

5. The FWC may adjust modern awards as part of a 4 year review, for example, to deal with a change in the work value of a classification or to deal with pressing new circumstances affecting a particular award: Second Reading Speech for the *Fair Work Bill 2009* (Cth).
6. The objectives and principles of the 4 year modern award review were set out in the decision of the FWC Full Bench in *4 Yearly Review of Modern Awards: Preliminary Jurisdictional Issues* [2014] FWCFB 1788. These principles include:
  - (a) A party seeking to vary a modern award in the context of this 4 year review must advance a merit argument in support of the proposed variation: *4 Yearly Review of Modern Awards: Preliminary Jurisdictional Issues* [2014] FWCFB 1788 at [23].
  - (b) Where a significant change to a modern award is proposed, it must be supported by a submission which addresses the relevant legislative provisions and be accompanied by probative evidence properly directed to demonstrating the facts supporting the proposed variation: *4 Yearly Review of Modern Awards: Preliminary Jurisdictional Issues* [2014] FWCFB 1788 at [23].
  - (c) The proposal to vary a modern award as part of this 4 year review 'must demonstrate that if the modern award is varied in the manner proposed then it would only include terms to the extent necessary to achieve the modern awards objective': *4 Yearly Review of Modern Awards: Preliminary Jurisdictional Issues* [2014] FWCFB 1788 at [36].

## ST IVES APPLICATION

7. St Ives has applied for a variation to the part time provision of the:
  - (a) *Social, Community, Home Care and Disability Services Industry Award 2010*;
  - (b) *Aged Care Award 2010*; and
  - (c) *Nurses Award 2010* (**relevant Modern Awards**).
8. St Ives' application arises from a pressing new circumstance affecting the relevant Modern Awards, being significant legislative changes which impact on the way home and aged care

services are provided in Australia. These changes are similar to some of the changes in the disability sector under the National Disability Insurance Scheme.

9. St Ives' application is consistent with the modern awards objectives of:
  - (a) promoting flexible modern work practices;
  - (b) promoting social inclusion; and
  - (c) ensuring an economically sustainable operation.

## **BACKGROUND**

10. St Ives Group (**St Ives**) is a major provider of:
  - (a) retirement villages and residential aged care centres in Western Australia; and
  - (b) in-home care to the elderly across Australia.
11. St Ives employs over 900 people across Australia, including nurses, support workers and personal care assistants. Over 500 of these staff are employed in home care services.
12. St Ives and its employees are covered by the relevant Modern Awards.
13. St Ives employees are generally employed pursuant to the terms and conditions of the relevant Modern Award.
14. The majority of St Ives' staff are part time. A significant majority of the part time workforce are female with family or caring responsibilities.
15. St Ives has made a conscious decision to employ its workforce on a part time, rather than a casual basis in order to provide secure and meaningful jobs to its workforce.
16. Prior to the decision in *Australian Municipal, Administrative, Clerical and Services Union* [2013] FWC 4141 to vary the *Social, Community, Home Care and Disability Services Industry Award 2010 (SCHCADS Award)* to include clause 10.3(c), St Ives was able to employ and utilise its part time home care workers in a flexible manner that worked for its clients, its employees and St Ives.

17. This involved the utilisation of an 'availability roster' which allowed employees to nominate their preferred days and times of work for the next roster and allowed St Ives to then roster work according to client requirements.
18. The variation of the SCHCADS Award restricted the flexibility of part time workers, by requiring the number of hours, days of work and start and finish times to be agreed prior to commencement of employment.

## **OVERVIEW OF ST IVES' OPERATIONS**

19. St Ives provides care to people in need. Providing such care involves St Ives responding to client requirements both in respect of the type of care required and client schedules, both of which frequently change. Increasingly, this requires flexibility in working and rostering arrangements.
20. Many of the clients who use St Ives' services are dependent on government funding for their care requirements.
21. Recently, legislative changes within the aged and support services industry have seen a change in the funding and care models, primarily a move to Consumer Directed Care. This change has resulted in individual consumers becoming responsible for determining their own care requirements and managing their own care budgets.
22. One consequence of this change is the need for aged and home care providers to become more flexible within their service offerings, including in respect of when services are provided and what services are provided together as a package.
23. A key challenge faced by St Ives is the ability to be flexible and adaptable in providing services to clients in a financially viable way given its significant part time workforce.
24. The challenges faced by St Ives when scheduling client services are described in the witness statements of:
  - (a) General Manager Human Resources (Operations) for the St Ives Group; and
  - (b) Administration Assistant (Operations) for the St Ives Group.

## **RECENT LEGISLATIVE CHANGES AFFECTING ST IVES**

25. We note the submissions of Jobs Australia (2 March 2015) in relation to the SCHCADS Award and agree with their submissions in relation to the impact of the legislative changes in the community services sector.

## **SUBMISSIONS IN RELATION TO PART TIME WORK**

26. Currently, the relevant Modern Awards all contain a requirement for the employer to agree with part time workers prescriptive rostering and working arrangements prior to employment commencing.
27. The current clause in each of the relevant Modern Awards requires an employer and employee to agree on a regular pattern of work including the number of hours to be worked each week, the days of the week the employee will work and the starting and finishing times each day, before the employee commences employment.
28. The requirement to guarantee days of work and start and finish times is extremely difficult for an employer in the community services and aged care sector, particularly in relation to home care. In many cases, the availability of work at particular times is not able to be guaranteed, due to a range of factors outside the control of St Ives. For example, the health and needs of the client may change rapidly.
29. St Ives submits that an amendment to clause 10.3 of the relevant Modern Awards allowing the guaranteeing of a minimum number of hours of work would be more operationally feasible and economically appropriate within the industry.
30. Clause 10.3(c) was inserted into the SCHCADS Award in 2013, prior to the current legislative changes: *Australian Municipal, Administrative, Clerical and Services Union* [2013] FWC 4141.
31. In that case Senior Deputy President Watson accepted the proposal by the ASU to insert clause 10.3(c). However, His Honour said at [20] "if significant practical problems emerge an appropriate variation can be sought."
32. In light of the changes to the industry in terms of funding arrangements, practical problems have emerged and an appropriate variation is required to fix these practical problems.

33. Recent industry changes mean the clause, as it is currently drafted, will make the engagement of part time workers increasingly difficult as specific hours of work, including starting and finishing times are becoming less predictable.
34. St Ives proposes varying clause 10.3 of the relevant Modern Awards to ensure consistency and to address the flexibility issues discussed above. The draft proposed clauses were contained in St Ives' application.
35. It is submitted that the proposed clause provides both the flexibility needed by employers in the industry and the safeguards employees need.
36. By stipulating that employers and employees will agree in writing on a minimum number of hours and available days, the employees achieve certainty without employers being subject to the unnecessary rigidity of the current clause.
37. Employees have a further safeguard in the requirement that any variation to the original agreement relating to hours and days will also need to be in writing.

#### **CASUALISATION**

38. A failure to address the restrictive clauses around part time work in the relevant Modern Awards may result in an increasing casualisation of the workforce within the industry as employers seek greater flexibility to meet client needs.
39. St Ives believes aged, disability and support workers (many of whom work part time) deserve meaningful and stable employment and the benefits that go with that (including paid leave). However, for this to be operationally sustainable into the future, amendments to the provisions around part time work in the relevant Modern Awards is required.

#### **FAIR AND RELEVANT SAFETY NET**

40. Encouraging part time employment, and providing the entitlements to personal and annual leave that go along with it, are essential to ensuring a fair and relevant safety net.
41. Casuals are not entitled to the employment benefits of leave that part time employees are entitled to, or to notice and redundancy entitlements.

42. In line with our submission on casualisation, the spread of casualisation which would occur if the clause is not varied in line with our proposal would erode any fair and relevant safety net.

#### **PROMOTING FLEXIBLE MODERN WORK PRACTICES**

43. As set out above and in the witness statements filed in support of this application, the recent legislative changes that have impacted the industry have necessitated employers needing more flexibility in terms of rostering and hours of work.
44. It is therefore submitted that the proposed variation is necessary to promote flexible modern work practices.

#### **PROMOTING SOCIAL INCLUSION THROUGH INCREASED WORKFORCE PARTICIPATION**

45. As outlined above, increasing casualisation in the sector resulting from the rigidity of the current clause 10.3 of the relevant Modern Awards is having a negative impact on workforce participation.
46. St Ives is committed to promoting social inclusion by increasing workforce participation, however, clause 10.3 as currently drafted is detrimental to increased workforce participation.

#### **THE LIKELY IMPACT OF THE MODERN AWARD ON BUSINESS, INCLUDING PRODUCTIVITY, EMPLOYMENT COSTS AND THE REGULATORY BURDEN**

47. The current clause 10.3 of the relevant Modern Awards imposes a high regulatory burden on employers, reducing their flexibility.
48. In light of recent legislative changes impacting the industry, the regulatory burden imposed on employers in the community services and aged care sectors has become even heavier and is having an impact on employers' ability to provide the services to those members of society who need them.
49. To ensure the regulatory burden does not have further negative impacts on the sector, it is submitted the variation proposed by St Ives is necessary and appropriate.

## **SUBMISSIONS IN RELATION TO ROSTERS**

50. St Ives further seeks to clarify that where employees are provided copies of rosters (by email, post or otherwise), this satisfies the intention of the rosters clauses under the relevant Modern Award.
51. This involves varying:
- (a) Clause 22.6 of the *Aged Care Award 2010*;
  - (b) Clause 25.5 of the *Social, Community, Home Care and Disability Services Industry Award 2010*; and
  - (c) Clause 25 of the *Nurses Award 2010*.
52. Currently, the relevant clauses stipulate that rosters must be displayed in a place conveniently accessible to employees, yet also states that rosters may be communicated by telephone, direct contact, mail, email or facsimile.
53. These conflicting statements leave it open to argument that if a roster is not printed out and placed on a noticeboard two weeks before the start of the roster, the employer will be in breach of the clause, even if all employees have been personally emailed a copy and therefore have access to the roster.
54. The changes sought make it clear that if the employer has provided the roster to the employee by telephone, direct contact, mail, email or facsimile it has satisfied its obligations under the Award.
55. In the modern age, it is reasonable and practical to communicate with employees by email or other modern means.
56. Providing employees with their roster directly, rather than placing rosters on a noticeboard is an effective way of notifying employees of their roster. Many employees who work in the community may not see a roster on a noticeboard if they do not regularly attend head office where the noticeboard is located.
57. We submit that this is a reasonable and logical variation to the relevant Modern Awards.



58. The other proposed change is to reduce the time for provision of rosters in advance from two weeks to seven days.
59. In line with the submissions in relation to part time work above, recent legislative changes have necessitated greater flexibility in terms of hours of work and rostering.
60. The proposed variation still allows employees sufficient time to make personal arrangements around their work roster.
61. It is therefore submitted that this variation proposed by St Ives is consistent with the modern awards objective.

*Allion*

Allion Legal  
on behalf of St Ives Group Pty Ltd  
12 October 2015

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### Witness Statement of

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1. My name is \_\_\_\_\_, and I am the General Manager Human Resources (Operations) for the St Ives Group (**St Ives**).
2. I make this statement in support of the St Ives application to vary the:
  - *Social, Community, Home Care and Disability Services Industry Award 2010*;
  - *Aged Care Award 2010*; and
  - *Nurses Award 2010*.

### About the St Ives Group

3. St Ives is an aged care organisation that provides a range of services across Australia, including Home Care, Residential Care, Retirement Living, Sales and Real Estate.
4. Aged care is in a period of reform and as an organisation we are continually evolving in order to meet the ever changing requirements of the industry, and the needs of our clients.
5. Our organisation employs over 900 staff and a large proportion of these staff (approximately 500) sit within our Home Care division.
6. Our Home Care team provide a range of services to elderly clients in the community, including personal care, meal preparation, respite services, medication assistance, wound care and domestic assistance.
7. Services regularly occur in short blocks such as half an hour to shower a client each morning, or assist with medication.

### Scheduling Challenges

8. A total of 350 of our staff are support workers, who are responsible for the direct provision of care to over 1000 clients across Australia.
9. Coordinating the provision of services for this many clients is logistically very challenging.
10. The process involves our team establishing a care plan for the client, which includes determining:
  - the types of services that the client needs;
  - how many services the clients can have within their budget; and
  - what times and days the client would like those services to occur.
11. This information then goes back to the office, where our scheduling team considers the requirements of the clients, as well as the availability of our support workers to perform the required services.

12. It is essential that we can fit our support workers into shifts that suit the needs of the client, and from a customer service perspective we cannot dictate to the client when they will receive their services.
13. Therefore, our services and the shift times we can give to support workers directly relate to when the clients want to receive their services.
14. In the same way that our clients can determine when and how they want services to occur, our support workers also have varying levels of availability that we need to work with.
15. Support workers also have the right to change their availability as they need, particularly when their caring or study responsibilities change.
16. With 90% of our workforce being female, availability due to caring responsibilities can change regularly and often.
17. Another difficulty with scheduling services is that as services often occur in short blocks, St Ives needs to work to find a series of services that the support worker can attend one after the other.
18. If we can achieve this it makes attending work worthwhile for the support worker, and worthwhile for the business.
19. In order to make the travel component cost effective for the business (as travel between clients is a direct cost to St Ives), we also attempt to schedule support workers within a particular area or set of suburbs.
20. It is however difficult to find consecutive shifts in one area for support workers to attend, that also fits in with support worker availability.

### **Consumer Directed Care (CDC)**

21. To add to the logistical challenges of scheduling support workers to services, this year has seen the introduction of Consumer Directed Care (**CDC**) by the Federal Government, which has placed a greater focus on clients being responsible for their own care, their budgets, and the services they receive.
22. CDC has created financial pressure for many aged care providers, including St Ives. Our net profit margin has reduced by 9% since the introduction of CDC, and our budgets are not currently being achieved.
23. With the introduction of CDC, clients now have even more discretion around how and when their services are provided, and are responsible for their budget and how it is managed.
24. The prior system was vastly different and home care providers would manage the client's budget for them.
25. Clients have absolute discretion over who performs their service as well.
26. If the client decides that they do not like a particular support worker and want someone different to perform the service, we are obliged to accommodate this request.
27. This adds another level of complication to scheduling.

### **Cancelled shifts**

28. Another area of pressure for the business is in relation to cancelled shifts.
29. The needs of our clients change regularly and it is common for clients to need to shift or cancel services with minimal notice.

30. Likewise, clients can become ill, be hospitalised, or may need to shift into a higher care environment such as Residential Care, which removes the need for services to that client altogether.
31. The *Social, Community, Home Care and Disability Services Industry Award 2010* states that a cancelled shift is not payable if we let the worker know of the cancellation, prior to 5pm the day before the shift was scheduled to place.
32. Conversely the shift would be payable (or must be re-rostered) if we let the worker know after 5pm the day before the shift was scheduled to take place.
33. In the first quarter of this financial year alone, St Ives has a record of 2898 hours of cancelled shifts from clients, and this is a conservative figure as not all cancelled shifts are recorded if they are re-rostered immediately.

### **Award implications**

34. St Ives works particularly hard to ensure we are meeting the expectations of the modern awards applicable to our industry.
35. However, as part of my role I am aware of the operational pressures placed on the business from the employment awards we work with. One such area is in regards to establishing regular patterns of work for our support workers.
36. The associated clause from the Social, Community, Home Care and Disability Services Industry Award 2010 is 10.3(c) provides:
 

*Before commencing employment, the employer and the employee will agree in writing on a regular pattern of work including the number of hours to be worked each week, the days of the week the employee will work and the starting and finishing times each day. Any agreed variation to the regular pattern of work will be recorded in writing.*
37. Due to factors outlined above, this clause is nearly impossible for aged care (in particular home care) organisations to meet, without creating significant financial pressures on the business.
38. It is very difficult to establish that a support worker will work on set days and at set times, for example establishing that a support worker will work on a Monday, Wednesday and Friday each week from 9.00am to 12.00pm.
39. Clients may cancel or move their service for numerous reasons, or may decide that they no longer want their regular support worker and want somebody new.
40. Even if St Ives could establish a pattern of work such as in the Monday/Wednesday/Friday example, it would often involve finding a set of 3 or 4 services in a row for the worker to attend.
41. With guaranteed hours, it would only take one of those clients to withdraw a service to create a gap in the worker's roster, which would then need to be reallocated or paid, due to the previously established guaranteed hours.
42. Guaranteeing shift times and hours creates an untenable scenario for aged care organisations specialising in Home Care, both financially and from a scheduling point of view.
43. If the client has cancelled with sufficient notice, St Ives cannot charge the client for the cancellation. However if the support worker has guaranteed hours, they are left with a shift that must be reallocated, or otherwise the support worker must be paid, leaving the organisation to pay for a shift that is not chargeable to the client and is therefore is a direct cost to the business.

44. If we use the conservative figures for cancelled shifts provided above, if St Ives was required to pay for all cancelled shifts because the hours cancelled were guaranteed hours, this would equate to a cost of \$87,000 per quarter, extrapolated out to a cost of \$348,000 for the year.
45. Even as a conservative estimate, this would be a direct cost for the business that is not chargeable or attributed to any client, and would be extremely damaging to the business and financially unsustainable.

#### **Alternatives and Conclusion**

46. St Ives has considered alternatives to meeting the requirement of clause 10.3(c) and one such alternative is to consider only hiring casual staff.
47. This directly conflicts however with the strategy that St Ives has adopted in recent years in order to stabilise our workforce and retain and reward its staff.
48. We aim to have a proportion of only 10% of our workforce as casual employees, as we believe it is better for staff, better for clients, and better for the business to provide secure employment.
49. Clauses such as 10.3(c) create difficulties for businesses like St Ives, as the requirements of the award sit in absolute discord with the requirements of the aged care industry and the demands of our consumers.
50. Aged care organisations require employment awards that not only support and protect our workers, but that satisfy the requirements of the industry and its consumers as well.

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St Ives Group Pty Ltd  
12 October 2015

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4 Year Modern Award Review

*Social, Community, Home Care and Disability Services Industry Award 2010*

*Aged Care Award 2010*

*Nurses Award 2010*

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### **Witness Statement of**

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1. My name is \_\_\_\_\_, and I am the Administration Assistant - Operations for the St Ives Group (**St Ives**).
2. I make this statement in support of the St Ives application to vary the:
  - *Social, Community, Home Care and Disability Services Industry Award 2010*;
  - *Aged Care Award 2010*; and
  - *Nurses Award 2010*.

### **ROSTERING/SCHEDULING ISSUES**

3. My previous position with St Ives was as a scheduler. I was responsible for rostering St Ives' staff against client demands and client requirements.
4. My current position involves training all schedulers and providing back up support for scheduling.
5. The main difficulty in regards to scheduling is matching staff availability and skill set with client requirements.

6. Staff provide the days and times they are able to work and clients determine what days/time they would like services. Staff availability and skill set may or may not fit in with what our clients have requested.
7. Staff can alter their hours of work with 2 weeks' notice, which can put pressure on scheduling to try fit extra clients into already full rosters and to find additional work for the staff member within their new availability.
8. Some clients get up very early in the morning and need to take medication, meaning the services need to remain at roughly the same time. St Ives has limited staff who start very early in the morning making it logistically difficult and expensive to get the staff that are available for work out to the client.
9. It is a similar situation late in the evening.
10. St Ives also has many staff who only work within school hours. These staff are very difficult to roster for morning personal care services as the first shift could only start at 9am. By the time staff finish their first client, it will be close to 10am which is often too late for clients' personal care.
11. Most clients prefer to have showers and dinner at the same time. St Ives only has limited staff available, forcing clients to be moved later/earlier than requested. This is caused by not having enough staff starting at the preferred time of 7am for morning staff and finishing at the preferred time of 7pm for afternoon staff.
12. Clients also may request time specific respites, or services at preferred times of days that do not fit in with staff availability. This means clients may have to be moved around to accommodate time specific services.
13. St Ives has new service packages starting all the time, sometimes with only a few days notice. When the clients start, they advise which days/times they would like services. St Ives needs to accommodate new clients within the existing staff rosters.
14. If St Ives doesn't have any staff available then St Ives will try to make someone available. This may involve calling staff to ask if they can extend their hours or moving clients around.
15. I have set out below an example of the issues with rostering:

*Example: Mrs V has services each day at 7am, the services can start no later than 7.30am or the client will shower herself which puts her at risk of falling. This client lives in a difficult area to get to; no staff currently live in this area and few staff start at 7am. Most days St Ives pay staff extra travel to get to and from this client and have a lot of difficulty getting any permanent staff for this client.*

### **Cancelled Shifts**

16. When a client would like to cancel a shift the process is to call the office and inform the Care Team.
17. The Care Team will then advise scheduling as to which dates/services the client would like to cancel.
18. If the client cancels without supplying sufficient notice, the client will be charged.
19. If the client gives enough notice (i.e. before 5pm the previous day), St Ives does not charge the client.
20. This puts the support staff in a vulnerable position, as a client can cancel/go on leave/go into hospital at any time without notice, leaving the worker with less hours than first rostered and if the cancellation is last minute, the likelihood of the staff getting the hours replaced is low.
21. St Ives has clients that can have long respites, if the client cancels for example their 3 x 3 hour respites for that week to go on social leave and all of those shifts are with the same staff member, that staff member will lose 9 hours which may not be replaced if there is no work left to allocate.
22. A difficulty with cancellations is that scheduling staff have no control over this.
23. A scheduler could for example have a 6 hour respite to cover due to the permanent staff member being on leave.
24. The scheduler may find a compatible staff member who has only 2 hours of work that day with very low care clients (easily covered), and make the decision to allocate the 6 hour shift to that worker instead.



25. The client's family may then, closer to the day of the respite decide that they would rather take care of the client themselves than have a different support worker and cancel the service.
26. This leaves the support staff with no shifts and their regular work has already been given to someone else.

*Example: Client Mrs D had 6 hours of respite per week with the same support worker each week for many years. The client now only has this service monthly to accommodate her budget, meaning a loss of 6 hours for the staff member each week until St Ives can replace the shifts. This support worker is unable to perform alternative duties due to medical restrictions and therefore it will be difficult to replace these hours.*

### **Difficulties with Guaranteed Shifts**

27. It is virtually impossible to guarantee a set amount of hours to staff members.
28. Staff, many of whom have family responsibilities, can change their availability with 2 weeks' notice meaning the clients they once had no longer fit in their rosters.
29. They may need a whole new set of clients which may, or may not be available.
30. Staff can move to a new area meaning they are no longer practicably able to attend the clients they once had.
31. Clients can also request to not have staff back if the staff are not compatible with the client for a particular reason (though St Ives discourages this and tries to manage any performance issues). This factor alone can have a huge effect on the amount of hours a staff member can be rostered for.
32. There are also ongoing and constant cancellations and changes as described above.
33. It is a regular occurrence to have clients in and out of hospital.
34. When a client leaves hospital their needs may change, the services that they once had may not be required and their whole roster may change with a few days notice.
35. The new shifts and requirements may not fit in with the existing staff rosters, resulting in a loss of hours for them.

36. Given the age of St Ives' client base, clients often progress from home care to a residential facility as their health declines and they are unable to remain at home. Unfortunately many clients pass away, both of these situations often happen with limited or no notice.
37. It is not uncommon to have a staff member that has more than one permanent client in hospital at a time.
38. To have to guarantee hours, shifts and start and finish times is extremely difficult for a scheduler in this industry, as most of the factors that change the amount of hours are out of the scheduler's control.
39. To be able to manage a minimum amount of hours is more feasible. Even with minimum hours, staff availability and the areas in which they travel need to be flexible. Although this would cause issues and a cost to the business from time to time, it would be manageable.

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Administration Assistant (Operations)  
St Ives Group Pty Ltd  
12 October 2015