

## DRAFT SUMMARY OF SUBMISSIONS

This summary incorporates submissions and submissions in reply received in accordance with the [Directions](#) issued on 19 September 2017.

Interested parties are invited to review the draft summary of submissions to ensure their submissions are accurately characterised. If any party seeks amendment to this draft summary of submissions they should notify [amod@fwc.gov.au](mailto:amod@fwc.gov.au) by **4.00 pm, Friday 3 November 2017**.

ITEM	PARTY	DOCUMENT	CLAUSE (PLED)	SUMMARY OF ISSUE	THEIR REFERENCE	NOTES
1	ASIAL	<a href="#">Sub-06/10/17</a>	1	<b>Title and commencement</b> Submits cl 2.2 of the current award should be retained.	Para 1	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Opposes ASIAL's submission. Submits Decision <a href="#">[2015] FWCFB 6656</a> decided this issue – the Full Bench decided to delete the absorption clause from all modern awards.	Paras 3 – 6	
2	ASIAL	<a href="#">Sub-06/10/17</a>	2	<b>Definitions</b> Submits definition of 'default fund employee' from current award cl 3 be retained.	Para 3	This term is not used in the award.
	UV	<a href="#">Reply-Sub-20/10/17</a>		Disagrees with ASIAL's submission. Submits it is unnecessary.	Para 7	
3	ASIAL	<a href="#">Sub-06/10/17</a>	2	Submits definition of a shift worker should be included in definitions clause:  <i>'For the purpose of the NES, a shiftworker is an employee: (a) who works a roster and who, over the roster cycle, may be rostered to work ordinary shifts on any of the seven days of the week; and</i>	Para 4	

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				<i>(b) who is regularly rostered to work on Sundays and public holidays’.</i>		
	UV	<a href="#">Reply-Sub-20/10/17</a>		Does not object to ASIAL’s submission provided the definition inserted is current award cl 24.2.	Para 8	
4	ABI & NSWBC	<a href="#">Sub-12/10/17</a>	2	Submits definition of ‘cash-in-transit’ differs from meaning in current award. Submits primary difference is movement was previously ‘usually in an armoured vehicle’ but is now ‘in an armoured or other vehicle’. Submits requirement of ‘usually’ is an important difference.	Para 2	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Agrees with ABI & NSWBC.	Para 2	
5	ABI & NSWBC	<a href="#">Sub-12/10/17</a>	4.2	<b>Coverage</b> Submits ‘security services industry’ definition has omitted some words from current award cl 4.2. Submits they should be reinserted. (a) Subclause (a) should be redrafted to read <i>‘patrolling, protecting, screening, watching or guarding any people <u>and/or</u> property (including cash or other valuables)’</i> ; and (b) Subclause (d) should be amended to read <i>‘the operation of a <u>security control room or monitoring centre</u>’</i> .	Para 3.1	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Does not object to ABI & NSWBC’s proposed changes.	Para 9	
6	ASIAL	<a href="#">Sub-06/10/17</a>	4.2(c)	Submits clause should include the words	Para 5	

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				'or control room'.		
7	ASIAL	<a href="#">Sub-06/10/17</a>	4.2(d)	Submits 'control room' has been omitted. Submits a 'control room' is separate and distinct from a monitoring station/central station. Submits clause should be re-drafted to '(d) the operation of a security control room or central station'.	Para 2	Should control room be defined?
	UV	<a href="#">Reply-Sub-20/10/17</a>		Supports retaining wording in cl 4.2(d) of the current award.	Para 10	
8	ABI & NSWBC	<a href="#">Sub-12/10/17</a>	4.3	Submits 'minor' has been added, which is not in the current award clause. Submits it should be removed.	Para 3.2	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Does not object to ABI & NSWBC's proposed changes.	Para 9	
9	ASIAL	<a href="#">Sub-06/10/17</a>	6.4(a)	<b>Individual flexibility arrangements</b> Submits clause should be amended to 'give the employee the proposed agreement'.	Para 6	Clause determined by <a href="#">[2017] FWCFB 4419</a>
	UV	<a href="#">Reply-Sub-20/10/17</a>		Disagrees with ASIAL's submission. Submits PLED drafting reflects that the wording of standard clauses has been addressed, specifically in <a href="#">[2017] FWCFB 4419</a> .	Paras 11 – 12	
10	ASIAL	<a href="#">Sub-06/10/17</a>	6.8	Submits clause incorrectly cross references cl 6.9(b), which does not exist. Submits reference should be to cl 6.7(b).	Para 7	
	UV	<a href="#">Reply-Sub-</a>		Agrees with ASIAL's submission.	Para 13	

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		<a href="#">20/10/17</a>				
11	UV	<a href="#">Sub-06/10/17</a>	8	<b>Types of employment</b> Submits PLED removes obligation on employer to record information about type of employment in a time and wages record in current award 10.2. Submits current award clause should be retained.	Paras 2 – 5	
	ASIAL	<a href="#">Reply-Sub-20/10/17</a>		Submits PLED does not require variation as record keeping is adequately expressed in s.535 of the Act.	Para 1	
12	ASIAL	<a href="#">Sub-06/10/17</a>	10.3	<b>Part-time employment</b> Submits clause should be re-drafted to make reference to pro rata entitlements. Provides draft wording.	Para 8	
	ABI & NSWBC	<a href="#">Sub-12/10/17</a>		Submits clause is problematic because it can be interpreted to mean that other provisions of PLED would be applied to part-time employees in the same way as they are applied to a full-time employee, because it does not specify they should be pro-rated per current award cl 10.4(a)(iii).	Paras 4.1, 4.2	
13	ABI & NSWBC	<a href="#">Sub-12/10/17</a>	10.4	Submits clause is problematic because it refers to payments made in accordance with the NES and it is unclear how the proportionality of those payments is determined.	Paras 4.3, 4.4	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Supports retaining current award clause 10.4(a)(iii).	Para 14	
14	ASIAL	<a href="#">Sub-06/10/17</a>	10.5, 10.6	Submits clauses restrict employers from engaging part-time employees on a roster	Para 9	

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				cycle in the same way as it could a permanent full-time employee. Submits this is inconsistent with cl 10.1 and requires further discussion/clarification.		
	UV	<a href="#">Reply-Sub-20/10/17</a>		Disagrees with ASIAL's submission. Submits PLED appropriately reflects existing entitlements in cl 10.4(b) of the current award.	Paras 15 – 16	
15	ASIAL	<a href="#">Sub-06/10/17</a>	10.9	Submits clause should be re-drafted to reflect current award cl 10.4(f) which is more accurate. Provides draft wording in submission.	Para 10	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Prefers the wording in PLED.	Para 17	
16	ABI & NSWBC	<a href="#">Sub-12/10/17</a>	10.9	Submits clause would be improved by addition of a reference to the actual amount payable in accordance with cl 15. Suggest: " <i>A part time employee must be paid in accordance with Column 3 of Table 4 - Minimum Rates in clause 15 for each ordinary hour worked.</i> "	Para 4.5	
17	ABI & NSWBC	<a href="#">Sub-12/10/17</a>	11.2(a)	<b>Casual employment – casual loading</b> Submits clause should be amended to reduce any uncertainty as to whether casual loading is cumulative or compounding. Suggest 'in addition to' rather than 'on top of'.	Para 5	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Supports retaining wording in current award cl 12.5(a) which states " <i>an additional 25%</i> ".	Para 20	

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18	ASIAL	<a href="#">Sub-06/10/17</a>	12.1	<b>Classifications</b> Submits clause should be amended. “ <i>An employer must pay an employee the rate of pay applicable to the classification in which the employee works</i> ’.	Para 11	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Submits ASIAL’s proposed amendment is not necessary.	Para 18	
19	ABI & NSWBC	<a href="#">Sub-12/10/17</a>	12.3(b)	<b>Classifications – Licensing</b> Submits current award cl 10.6(b)(ii) has been omitted from PLED. Notes clients would be interested to understand why, otherwise proposes it be reinserted.	Para 6	
20	ASIAL	<a href="#">Sub-06/10/17</a>	12.3(d)	Submits clause should retain ‘and as a result cannot carry out a security activity’ from current award cl 10.6(d).	Para 12	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Prefers wording in PLED.	Para 19	
21	ABI & NSWBC	<a href="#">Sub-12/10/17</a>	13.3(a)(ii)	<b>Ordinary hours of work and rostering – Shift duration</b> <i>Response to question raised by the Commission</i> Agrees with the Commission’s comment. Submits cl 21.2(a)(iii) of current award has the same effect. Does not in principle oppose an amendment to increase flexibility.	Para 7.1	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Submits PLED clause has the same legal effect as current award cl 21.2(a)(iii) and does not change flexibility in rostering	Paras 21 – 23	

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				arrangements.		
22	ASIAL	<a href="#">Sub-06/10/17</a>	13.3(c)	Submits ‘concerned’ per cl 21.2(b) current award should be reinstated or ‘affected’ should be inserted. Submits at some work sites security officers may work shorter shifts so may not need to be involved in discussions.	Para 13	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Does not oppose ASIAL’s submission.	Para 27	
23	ABI & NSWBC	<a href="#">Sub-12/10/17</a>	13.3(d)	Submits PLED includes reference to a ‘union’ but current award cl 21.2(c) refers to the right to be represented. Submits current award wording should be reinstated.	Para 7.2	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Disagrees with ABI’s submission. Submits unions can provide crucial assistance to employees.	Paras 24 – 25	
24	ABI & NSWBC	<a href="#">Sub-12/10/17</a>	13.3(h)	Submits definition of ‘rest breaks’ is clumsy. Proposes clause be amended. Provides draft wording.	Para 7.3	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Agrees with ABI’s submission.	Para 26	
25	ASIAL	<a href="#">Sub-06/10/17</a>	13.5(b)	<b>Ordinary hours of work and rostering – Display of roster and notice of change of roster</b> Submits ‘or provide it by electronic means’ be inserted after ‘employees’.	Para 14	
	ABI & NSWBC	<a href="#">Sub-12/10/17</a>		Submits ‘or provide it by electronic means’ should be reinstated.	Para 8.1	
	UV	<a href="#">Reply-Sub-</a>		Agrees with both submissions above.	Para 28	

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		<a href="#">20/10/17</a>				
26	UV	<a href="#">Sub-06/10/17</a>	13.5, 13.6	<b>Ordinary hours of work and rostering</b> Submits PLED substantially changes provisions of display of rosters which alters the legal effect. Submits current award has an entitlement to overtime where an employer has notified an employee of the roster and amended it without notice, but PLED does not contain such a provision. Submits current award wording ' <i>Such times, once notified, may not be changed without the payment of overtime, or by seven days' notice given in accordance with this clause</i> ' should be retained.	Paras 6 – 10	
27	ASIAL	<a href="#">Sub-06/10/17</a>	13.5(c)	Submits current award cl 21.12 should be retained.	Para 15	
	ABI & NSWBC	<a href="#">Sub-12/10/17</a>		Submits reference to payment of overtime in circumstances where less than 7 days' notice has been provided has been omitted. Submits reference provides clarity.	Para 8.2	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Agrees key parts of current award cl 21.12 should be retained. Refers to submissions in relation to item 26.	Para 29	
28	UV	<a href="#">Sub-06/10/17</a>	13.6	<b>Notice of rosters – Relieving Officer</b> <i>Response to question raised by Fair Work Commission</i> Submits length of time for advance notice should be a minimum of 14 days.	Paras 11 – 13	



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	ASIAL	<a href="#">Sub-06/10/17</a>		Submits allowance is to compensate nominated employees for not having a roster and being available at short notice. Submits industry custom is the notice period can be as little as 2 hours and the 24 hours' notice 'where possible' per the award is often not possible.	Para 16	
	ABI & NSWBC	<a href="#">Sub-12/10/17</a>		Submits defining 'advance notice' to mean a particular period would be a substantive change. Notes if the Commission is minded to insert a definition, it would seek to be heard.	Para 9	
	ASIAL	<a href="#">Reply-Sub-20/10/17</a>		Submits UV's submission would change the effect of current award cl 21.12 and PLED cl 13.5. Submits PLED cl 13.5 should be maintained.	Para 2	
29	UV	<a href="#">Sub-06/10/17</a>	14	<b>Breaks</b> Submits 'Example 1' may cause confusion. Example does not clearly articulate George should be paid for the full 7.6 hours even though he does not work it. Submits example is unclear and should be amended.	Paras 14 – 17	
	ASIAL	<a href="#">Reply-Sub-20/10/17</a>		Submits there is no confusion in PLED.	Para 3	
30	ABI & NSWBC	<a href="#">Sub-12/10/17</a>	14	Submits a provision similar to current award cl 14.4 is not included in PLED. Submits an employee who is unable to be provided with an unpaid meal break due to operational requirements will be able	Para 10	

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				to be provided with a paid meal break. Submits clause be removed.		
	UV	<a href="#">Reply-Sub-20/10/17</a>		Disagrees with ABI's submission. Submits cl 14.4 retains the meaning within current award cl 21.6(a).	Para 30	
31	ASIAL	<a href="#">Sub-06/10/17</a>	14.3	Submits the word 'operationally' per current award cl 21.6(a) should be reinserted.	Para 17	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Agrees with ASIAL's submission.	Para 31	
32	ASIAL	<a href="#">Sub-06/10/17</a>	14.5	<b>Breaks between work periods</b> Submits current award cl 21.3 ' <i>Breaks between successive shifts</i> ' is more appropriate. 14.5 should read: ' <i>Each ordinary time shift must be separated from any subsequent ordinary time shift by a minimum break of not less than eight hours</i> '.	Para 18	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Prefers PLED wording.	Para 32	
33	UV	<a href="#">Sub-06/10/17</a>	15.1	<b>Minimum rates</b> Submits current award cl 14.1 contains recognition that minimum weekly wages are exclusive of penalties and allowances and PLED removes this. Submits PLED should be amended. Provides draft wording.	Paras 18 – 21	
	ASIAL	<a href="#">Reply-Sub-20/10/17</a>		Submits this is adequately explained in NOTE 2: Schedule B.	Para 4	

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34	ASIAL	<a href="#">Sub-06/10/17</a>	15.1	Submits Heading in Table 4—Minimum rates should have the heading ‘Minimum weekly rates – Full-time Employees.’	Para 19	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Prefers the form of the table in PLED.	Para 33	
35	ASIAL	<a href="#">Sub-06/10/17</a>	17.2	<b>Payment of wages</b> Submits ‘or Thursday’ should be added after ‘Wednesday’.	Para 20	
	ABI & NSWBC	<a href="#">Sub-12/10/17</a>		Submits clause should be amended to reflect requirement in current award cl 19 that payment of wages will occur no later than Thursday. Provides draft wording.	Para 11	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Submits PLED is not necessarily clearer than current award cl 19. Supports retaining current award clause.	Para 34	
36	ASIAL	<a href="#">Sub-06/10/17</a>	17.3	Submits ‘without cost to the employee’ should be deleted. Submits current award cl 19 does not contain this phrase. Submits an employer should not have to pay a charge if a bank decides to charge a customer for a service.	Para 21	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Disagrees with ASIAL’s submission. Submits PLED accurately reflects employees should not have to pay any additional costs to receive wages.	Para 35	
37	UV	<a href="#">Sub-06/10/17</a>	19.1	<b>Allowances</b> Submits PLED alters language regarding payment of allowances and current award cl 15.1 is clearer and more direct. Submits current award cl should be	Paras 29 – 32	

ITEM	PARTY	DOCUMENT	CLAUSE (PLED)	SUMMARY OF ISSUE	THEIR REFERENCE	NOTES
				retained.		
38	ABI & NSWBC	<a href="#">Sub-12/10/17</a>	19.4	<b>Allowances – Broken shift allowance</b> Submits PLED does not make it clear the allowance is not payable in respect of both periods of the broken shift. Submits ‘total’ be inserted before ‘broken shift allowance’.	Para 12	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Disagrees with ABI’s submission. Submits PLED is clear.	Para 37	
39	ASIAL	<a href="#">Sub-06/10/17</a>	19.5	<b>Allowances – Supervision allowance</b> Submits allowance should be expressed as a per shift allowance as well as per week.	Para 22	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Disagrees with ASIAL’s submission. Submits it is a substantive change.	Para 36	
40	UV	<a href="#">Sub-06/10/17</a>	19.6	<b>Allowances – Relieving Officer Allowance</b> Submits PLED has amended the manner in which a relieving officer may be appointed. Submits current award cl 15.8 requires employee’s agreement if employer wishes to appoint them as the relieving officer. Submits PLED has removed the agreement requirement and is a substantive change. Submits current award clause should be retained.	Paras 22 – 26	
41	UV	<a href="#">Sub-06/10/17</a>	19.6	<b>Allowances – Relieving Officer Allowance</b> <i>Response to question from Fair Work Commission</i>	Paras 27 – 28	

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				Submits an employee appointed to the position is paid the allowance from the time of appointment until the time they transfer to a stationary position. Submits the allowance is paid on a weekly basis regardless of how many shifts are worked that week.		
	ASIAL	<a href="#">Sub-06/10/17</a>		Submits this appointment is made with short notice to cover sick leave and unplanned longer term leave.	Para 23	
	ABI & NSWBC	<a href="#">Sub-12/10/17</a>		Submits clauses 19.5 and 19.6 refer to weekly allowances. Submits the current practice is for these allowances to be divided into a daily figure for employees who do not work a full week as a supervisor or relieving officer.	Para 13	
	ASIAL	<a href="#">Reply-Sub-20/10/17</a>		Submits depending on size and operational requirements, relieving officers may be appointed in different ways. Regardless, allowance is paid weekly. Notes current award cl 24.6(b) indicates it can be a continuous arrangement.	Para 5	
42	UV	<a href="#">Sub-06/10/17</a>	19.8	<b>Allowances – Meal Allowance</b> Submits PLED alters legal effect of the clause and changes the circumstances in which entitlement to the allowance arises. Submits under current award cl 15.3 the entitlement arises where employee is required to work ‘more than one hour’	Paras 33 – 37	

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				without being notified before the previous day. Submits PLED provides the entitlement where employee is required to work 'overtime' of more than one hour without being notified before the previous day. Submits PLED should be amended. Provides draft wording.		
	ASIAL	<a href="#">Reply-Sub-20/10/17</a>		Submits that if a finishing time is fixed for a permanent full-time or part-time employee any change at the discretion of the employer would invoke the overtime clause. Submits UV's assertion is a misinterpretation of the award.	Para 6	
43	ASIAL	<a href="#">Sub-06/10/17</a>	21.3	<b>Overtime – Overtime rates</b> Submits clause is inconsistent with other clauses in award. Submits overtime occurs outside of or in excess of ordinary rostered hours.	Para 24	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Disagrees with ASIAL's submission. Submits there is no inconsistency.	Para 38	
44	ASIAL	<a href="#">Sub-06/10/17</a>	21.3(a)	Submits 'minimum hourly' should be deleted and current award cl 23.3 wording reinstated.	Para 27	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Prefers wording in PLED.	Para 40	
45	ASIAL	<a href="#">Sub-06/10/17</a>	21.3(b)	Submits current award cl 23.4 should be retained.	Para 25	
46	ASIAL	<a href="#">Sub-06/10/17</a>	21.3(b)	Submits PLED is a departure from current award which is clear. Submits current award cl 23.4 should be retained	Para 29	

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				otherwise it may be inconsistent with the object to ensure 'no employee can take home less pay'.		
	ABI & NSWBC	<a href="#">Sub-12/10/17</a>		Submits PLED departs from current award cl 23.4. Submits current award wording should be reinserted.	Para 14	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Disagrees with both submissions above. Submits PLED clarifies meaning of the clause.	Para 39	
47	ASIAL	<a href="#">Sub-06/10/17</a>	21.3(c)	Submits clause should read 'Except as provided for in clause 21.3(b) overtime...any other day' or the clause should be deleted.	Para 26	
48	ASIAL	<a href="#">Sub-06/10/17</a>	22.3	<b>Penalty rates</b> Submits new sub clause '(d) the casual loading is not included when calculating the overtime rate' should be inserted.	Para 28	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Objects to ASIAL's submission. Submits this process is not appropriate for ASIAL to pursue this additional clause.	Paras 41, 42	
49	ASIAL	<a href="#">Sub-06/10/17</a>	22.3	Submits clause should be re-drafted. Provides draft wording.	Para 30	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Submits ASIAL's submission relates to cl 22.2. Submits cl. 22.1 PLED already addresses issue identified and proposed amendment is not necessary.	Para 43	
50	ASIAL	<a href="#">Sub-06/10/17</a>	22.3	Typographical error. Submits '6.0' should be '6:00 am'.	Para 31	
51	UV	<a href="#">Sub-06/10/17</a>	23.2	<b>Annual leave – Additional paid annual leave for certain shiftworkers</b>	Paras 38 – 41	

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				Submits PLED alters the legal effect of the clause and significantly reduces the number of employees who would be defined as shift workers under the award. Submits PLED introduces a requirement for a business to operate 24 hours a day, 7 days a week for an employee to be defined as a shift worker that does not exist in the current award. Submits definition in current award cl 24.2(a) should be retained.		
	ASIAL	<a href="#">Reply-Sub-20/10/17</a>		Submits UV's concerns are dealt with at s.87(3)(i)–(ii) of the Act.	Para 7	
52	ASIAL	<a href="#">Sub-06/10/17</a>	23.2(a)	Submits essential clauses have been omitted. Submits clause should be re-drafted. Provides draft wording.	Para 32	
53	UV	<a href="#">Sub-06/10/17</a>	23.3	<b>Annual leave – Payment for annual leave</b> Submits PLED reduces employee entitlements. Submits current award cl 24.6 provides the employee will receive the greater of the two options for payment during annual leave, but PLED removes this and only provides for the 17.5% loading. Submits current award cl 24.6 and 24.10 should be retained.	Paras 42 – 49	
	ABI & NSWBC	<a href="#">Sub-12/10/17</a>		Submits reference to payment for annual leave at rate employee would have received for working their normal hours per current award cl 24.6(a) appears to	Para 15	



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				have been omitted.		
54	UV	<a href="#">Sub-06/10/17</a>	23.3	Submits 23.3(a) PLED provides a loading of 17.5% is payable on accrued annual leave entitlements on termination. Submits this is significantly less than current award cl 24.10 which would reduce the annual leave payment of employees on termination. Submits current award cl 24.10 be retained.	Paras 47 – 49	
55	UV	<a href="#">Sub-06/10/17</a>	23.4	<b>Annual leave – Temporary close-down</b> Submits PLED removes entitlements. Submits current award cl 24.9(c) provides public holidays falling within close-down period will be paid but there is no equivalent in the PLED. Submits NES does not specifically provide any entitlements regarding public holidays that fall in a period of leave without pay. Submits current cl 24.9(c) be retained.	Paras 50 – 54	
56	ASIAL	<a href="#">Sub-06/10/17</a> <a href="#">Sub-20/10/17</a>	23.10	Submits new clause should be added – ‘23.10 Payment of accrued annual leave on termination’. Provides draft wording.	Para 33	
57	ASIAL	<a href="#">Sub-06/10/17</a>	Sched A	<b>Classification Definitions</b> Submits addition of the word(s) ‘and’ and ‘or’ are unnecessary and current award wording should be used.	Para 35	
	UV	<a href="#">Reply-Sub-20/10/17</a>		Does not object to ASIAL’s submission.	Para 45	

**List of abbreviations (in alphabetical order)**

ABI & NSWBC	Australian Business Industrial & New South Wales Business Chamber
AIG	Australian Industry Group
ASIAL	Australian Security Industry Association Ltd
PLED	Plain Language Exposure Draft
UV	United Voice