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Sent: Monday, 25 November 2019 3:39 PM
To: Chambers - Ross J <Chambers.Ross.j@fwc.gov.au>
Cc: Chambers - Clancy DP <Chambers.Clancy.DP@fwc.gov.au>; Chambers - Lee C <Chambers.Lee.c@fwc.gov.au>; Kyle Scott <Kyle.Scott@ablawyers.com.au>
Subject: AM2018/26 - Social, Community, Home Care and Disability Services Industry Award 2010

Dear Associate

I refer to the above matter and the hearing that was held on 15-18 October 2019.

Please find **attached** a Supplementary Statement of Wendy Mason of today's date and corresponding spreadsheet in response to questions raised by Justice Ross during the hearing on 18 October 2019 (Transcript at PN3187 and PN3313-PN3317).

We apologise for the delay in providing this information. We are instructed that the compilation of data was a manual task for the organisation and therefore took some time given the number of broken shifts.

If you have any questions or wish to discuss, please let me know.

Yours sincerely

Madeleine Tiedeman

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4 Yearly Review of Modern Awards

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

Matter: AM2018/26

SUPPLEMENTARY STATEMENT OF WENDY MASON

I, Wendy Mason, [REDACTED], affirm as follows:

BACKGROUND

1. I am employed by BaptistCare NSW & ACT (**the Company**) in the role of Operations Group Manager for the Home Services (*BaptistCare at Home*) Division.
2. My role involves oversight of 11 site managers across the Home Service division ensuring the effective delivery of high quality services to over 9000 clients in compliance with Aged Care legislation and Aged Care Quality Standards.
3. I provided a Statement in relation to this matter on 12 July 2019 (**First Statement**) and gave evidence during the hearing of these proceedings on 18 October 2019.
4. During the hearing on 18 October 2019, the Commission requested that I endeavour to provide further information relating to the following two matters:
 - (a) First, a breakdown of employee numbers by category of employment; and
 - (b) Second, further details regarding the use of broken shifts within our business and, in particular, data on the number of broken shifts involving more than one break.
5. I address these matters in this Supplementary Statement.

BREAKDOWN OF EMPLOYEE NUMBERS

6. At paragraph [25] of my First Statement, I refer to there being 980 employees covered by the *BaptistCare NSW & ACT Aged Care Enterprise Agreement 2017* (the **Enterprise Agreement**).
7. The breakdown of employees by category of employment is as follows:
 - (a) Full-time employees – 24 (2.4%);

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- (b) Part-time employees – 842 (86%); and
- (c) Casual employees – 114 (11.6%).

DATA ON BROKEN SHIFTS

8. At paragraph [67] of my First Statement, it was stated that in the month of May 2019 a total of 1,591 broken shifts were worked by the Company's home care employees.
9. The Commission has requested that I provide further information as to the proportion of broken shifts that have more than one break.
10. Following the hearing on 18 October 2019, I made inquiries with payroll regarding obtaining this information. Based on these inquiries, I am aware that our payroll systems do not store data in a manner that would allow this information to be extracted automatically or in a way that was straightforward. Rather, the data on broken shifts and the number of breaks in each shift would need to be extracted manually.
11. Given the time consuming nature of that exercise, I requested that Mr Casey Merrick, BI Analyst compile data for the month of September 2019.
12. Once Mr Merrick provided me with the data, I prepared a spreadsheet summarising the raw data for broken shifts worked in the Home Service division during the month of September 2019. The spreadsheet is **attached**.
13. The spreadsheet contains the following information:
 - (a) The regions in which the broken shifts were worked; and
 - (b) The number of broken shifts worked (by region and in total); and
 - (c) The portions of work involved in those broken shifts (either 2, 3, 4 or 4).
14. Where there are two portions of work, this involves one break in the shift.
15. Where there are three portions of work, this involves two breaks in the shift.
16. Where there are four portions of work, this involves three breaks in the shift.
17. Where there are five portions of work, this involves four breaks in the shift.
18. In total in the month of September there were 14001 shifts worked. Broken shifts were 10.3% of all shifts worked in September 2019.

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Signed by **Wendy Mason**

25th November 2019

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Region	Total no. of broken shifts 1/09 - 30/09/19	No. of portions = 2	No. of portions = 3	No. of portions = 4	No. of portions = 5
Canberra	237	159	64	12	2
Central Coast	67	67			
Hunter	142	140	2		
Central West	96	88	7		
Mid State	61	59	2		
Illawarra	95	69	16	9	1
Southern Highlands	27	22	4	1	
Goulburn	76	53	21	2	
Cumberland	48	4	44		
Hills District	74	72	2		
Nepean	12	10	2		
Mid North Coast	94	85	9		
Far North Coast	21	20	1		
Murrumbidgee	251	235	14	2	
Northern Sydney	12	12			
South East Sydney	103	73	29	1	
South West Sydney	36	21	14	1	
TOTAL	1452	1189	231	28	3