

BACKGROUND DOCUMENT 3 WITNESS OVERVIEW

Fair Work Act 2009 s.158—Application to vary or revoke a modern award

Aged Care Award 2010

(AM2020/99)

Nurses Award 2020

(AM2021/63)

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

(AM2021/65)

JUSTICE ROSS, PRESIDENT DEPUTY PRESIDENT ASBURY COMMISSIONER O'NEILL

MELBOURNE, 20 JUNE 2022

This document has been prepared to facilitate proceedings and does not purport to be a comprehensive discussion of the submissions made; nor does it represent the concluded view of the Commission on any issue.

- [1] The following Background Document contains:
 - a brief overview of each of the witness statements (including employers, union officials, and expert witnesses)
 - the relevant page number of each witness statement in version 2 of the Digital Hearing Book
 - links to the final witness statements and transcript reference
 - specific paragraphs of the witnesses' statements that they were taken to in crossexamination as well as links to any other documents referenced in the course of giving oral evidence

AM2020/99, AM2021/63, and AM2021/65 – Aged Care Work Value Case WITNESS OVERVIEW

Expert witnesses										
WITNESS	SYNOPSIS	DHB Page No.	Link to statement	Cross examined	Specific paragraphs of statement cross-examined on	Link to Transcript Reference	Additional documents taken to			
Dr Sara Charlesworth	 The witness is a Professor of Gender, Work & Regulation in the School of Management at RMIT University in Melbourne. The initial report consists of the witness' expert opinion on the matters raised in the letter of instruction dated 11 February 2021 (SC-2) in relation to residential aged care/Aged Care Award 2010 and goes to: the nature of the industrial history of setting the terms and conditions of personal care workers (PCWs) in residential settings in Australia covered by the Award; Nature and demographics of the residential aged care workforce, with reference to 2016 Census data and the 2016 National Aged Care Workforce Census and Survey (NACWCS) Data; the challenges faced by unions and employees in achieving higher wage rates in residential aged care through industrial arbitration and enterprise bargaining; her opinion that there has been a historical and ongoing undervaluation of work performed by 	4456 4527	Statement Supplementary Statement	Yes	First statement: [40], [58], [62].	2 May 2022 PN2472	CHC33015 Certificate III in Individual Support (see DHB p.15743) CHCAGE005 Provide support to people living with dementia (see DHB p. 15756) Referred to in examination in chief: Submission to Aged Care Data Improvement Unit, AIHW in response to			

PCWs in residential aged care, key contributing		the Exploring future
factors being the current wage structure for workers		data & information
under the Award and the gendered nature of the		needs for aged care
workforce;		<u>issues paper – 21</u>
• the changes in the composition of the residential		<u>March 2022</u>
aged care workforce and the impact of these changes		
on the duties, responsibilities and skills required of		
PCWs;		
skills required to perform work in residential aged		
care; and		
 the benefits and consequences of improving rates of 		
pay and conditions for workers in residential aged		
care.		
The supplementary report consists of the witness'		
expert opinion on the matters raised in the letter of		
instruction dated 27 July 2021 (SC-6) in relation to		
home care workers (HCWs)/Social, Community,		
Home Care and Disability Services Industry Award		
2010. The supplementary report goes to:		
• the nature of the industrial history of setting the		
terms and conditions of home care workers covered		
by the SCHADS Award;		
Nature and demographics of the work force in home		
care with reference to 2016 Census data, the 2016		
NACWCS data and 2020 Census data;		
the challenges faced by unions and employees in		
achieving higher wage rates in home aged care		
through industrial arbitration and enterprise		
bargaining;		

	 her opinion that there has been a historical and ongoing undervaluation of work performed by HCWs in home aged care, key contributing factors being the current wage structure for workers under the Award, the gendered nature of the workforce and the work, and its location outside an institutional setting; Changes to the nature of the work performed over time, the three main factors to support this being the growing longevity of older people and complexity of needs, decrease in number of directly employed HCWs in community based aged care and the high number of workers reporting that they need additional training; and Skills, level of responsibility and work conditions of HCWs. 						
Dr Gabrielle Meagher	 The witness is a Professor Emerita in the School of Social Sciences at Macquarie University. The report presents research on the nature and valuation of care work in Australian residential aged care and focuses on work carried out by employees under the Aged Care Award 2010. The evidence can be summarised in 7 main themes: Who lives in residential aged care and how this group is changing in that the resident profile is older, sicker, frailer and more diverse; Who cares for older Australians in residential aged care and how the workforce is changing with reference to gender and occupational structure; How the residential aged care sector is structured and how it is changing with reference to larger 	4592 4689	Amended supplementary statement	Yes	First statement: Page iv, point 7 Page v, "conclusion" Page 19, point 6.1 Page 21, point 6.2 Page 24, point 6.4	2 May 2022 PN2594	-

facilities and fewer providers, changes in ownership		
structure, and how this implicates quality of care;		
 Principles of aged care quality and associated 		
regulation;		
 A new 'household' model of residential aged care; 		
• The impact of sector trends on work in residential		
aged care such as changing occupational profile,		
increasing work demands, unique demands of		
ancillary work in residential aged care, person-		
centred care, changing operational environment, and		
changing administrative demands; and		
Work value issues in residential aged care		
particularly in relation to gender, worker		
motivations, social status of recipients of aged care,		
and the ownership and funding of aged care.		
The supplementary report expands on the first		
report however focuses on the nature and valuation		
of home care work carried out by employees under		
the SCHADS Award 2010. The evidence can be		
summarised in 5 main themes:		
 Who receives home care and support and how this 		
group is changing;		
How does the home care and support sector operate		
and how is this changing with reference to the		
changes to funding, models of home care and the		
current regulatory requirements and standards;		
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support and how is the workforce changing with		
reference to gender and occupational structure;		

	 Trends impacting the skills, responsibilities and judgement required in home care and support work such as the changing occupational profile, increased level of needs, changing models of care, increased work demands and new technologies; and Work value issues in home care and support. 						
Professor Kathleen Eagar	 The witness is a Professor of Health Services Research and Director of the Australian Health Services Research Institute of the University of Wollongong. The report goes to: The changing legislative context for residential aged care; The changing policy context for residential aged care; The funding context for residential aged care; Profile of the aged care workforce with reference to the Resource Utilisation and Classification Study (RUCS) 2019; The needs of people living in aged care with reference to the assessment tool and findings from the RUCS study; The quality and safety of the workforce and the factors that drive it namely governance and management, staff numbers, staff skill mix and staff continuity. The witness' overall expert opinion is that there is a strong case for improved pay and conditions for aged care workers based on: 	4754 4845	Statement Supplementary statement	Yes	First statement: Page 2, point 2 Page 3, point 3 Page 4, [3] Page 5 Page 6, figure 1 Page 7, table 2 Page 8, [1] and table 3 Page 10 Page 11, [1]-[2] and table 10 Page 12, [5]-[6] Page 13	9 May 2022 PN8723	Source referred to in cross-exam: Residential Aged Care Quality Indicators — October to December 2021

	 The work being historically undervalued largely attributed to the traditionally female dominated workforce; Changing profile of residents; and Changing nature of the workforce with less Registered Nurses (RNs) and more responsibility placed on aged care workers. The supplementary report provides commentary on						
	2 employer witness statements:						
	 Paul Sadler's statement at paragraphs [29] and [36]-[52]; and 						
	• Mark Sewell's statement at paragraphs [70]-[83].						
Associate Professor Smith and Dr Lyons	Associate Professor Smith is the Deputy Dean of the School of Business at Western Sydney University. Dr Lyons is a senior lecturer in the School of Business at Western Sydney University. The report provides the witness' expert opinion and goes to the following matters:	4850	Amended statement	Associate Professor Smith – yes Dr Lyons - no	[9] (see updated ABS data table here) [34], [60], [105]-[106], [163], [169].	2 May 2022 PN3250	ANMF's Form F46 - Application to vary a modern award AM2021/63
	 Concept of a gender pay gap in Australia as addressed in scholarly literature and available research studies, and how earnings data has consistently shown that a gender pay gap exists in Australia; Identifies the contributing factors to the gender pay 						
	gap in Australia, namely the differences in the returns received by women compared to men for productivity related characteristics, occupational segregation and undervaluation of feminised work;						

	 The concept of gender-based undervaluation in Australia and how it is addressed in scholarly literature and available research studies; The contributing factors to gender-based undervaluation in Australia including the gendered assumptions about divisions of paid/unpaid labour and social norms; The barriers and limitations to the proper assessment of work value in female dominated industries and occupations by industrial tribunals in Australia and how these barriers have impacted upon the setting of award minimum rates; and Discusses both general and gender-based undervaluation of work and explains why they believe there is a gender-based under valuation of the work done by RNs, Enrolled Nurses (ENs), Assistants in Nursing (AINs) and PCWs with reference to deficiencies in the Aged Care Award classification descriptions, lack of work value assessment having been conducted for employees covered by the Aged Care Award and Nurses Award, and increased work value of aged care workers since 2009 drawn from aged care workforce census reports. 						
Associate Professor Anne Junor	The witness is an Honorary Associate Professor in the School of Business at the University of NSW whose main research field is skill identification, particularly in the feminised service and care sectors. The witness prepared a 'Spotlight' Workbook with open questions and descriptor questions that are appropriate to address the classifications of RN, EN and AIN in aged care. The Spotlight tool is an aid in identifying	4953	<u>Amended</u> report	Yes	[223], [257], [259], [275] <u>Annexure 4</u>	2 May 2022 <u>PN3087 -</u> 3243	Spotlight Research report (see DHB p.15906) CHCDIV001 Working with diverse people

	invisible skills and measures skill content and skill						(see DHB p.15765)
	 invisible skills and measures skill content and skill level. This forms part of the <i>Primary Material</i> upon which the report is based. The evidence: Identifies the skills, effort, responsibility, and conditions of work of the specific workers who are the subject of the <i>Primary Material</i>; identifies and classifies the skills used in undertaking work within those classifications that are not identified in the classification descriptors; identifies skills in the <i>Primary Material</i> that were used invisibly and groups them in terms of skills that are hidden, under-defined, under-specified, or undercodified; identifies the reasons for invisibility of skill use and considers the fundamental explanation to be that the work is predominantly performed by women; Provides her opinion on whether the current rates of pay reflect underlying work value and provides evidence from the <i>Primary Material</i> of significant undervaluation based on extensive, intensive and clustered use of unrecognised skills at a complex level and the under-recognised effort, responsibility and job size; and Explains why she holds the view that the primary reason for low pay rates in aged care is because the work is overwhelmingly performed by females ("gender-segregation"). 						(see DHB p.15765)
Professor Susan Kurrle	The witness is Curran Professor in Health Care of Older People at the University of Sydney and a senior staff specialist geriatrician. The report consists of the	5223	Statement	Yes	Page 3, [2] Page 5, [3]-[4] Page 8, [3]	3 May 2022	-

witness' expert opinion on the matters raised in the	Page 9, [2]	PN3567-
letter of instruction dated 11 February 2021 (SK-2)	Page 10, [2], [4]	3710
		3710
and goes to:	Page 11, para(r)	
regulation of the aged care system and changes over	Page 12, [1]	
time;		
• the changes in the composition of the workforce in		
residential aged care and the impact the changes		
have had on the duties, responsibilities and skills		
required of workers in residential aged care;		
the nature of the work performed and skills required in the good according to the Proposal.		
in the aged care sector (including in the Personal		
Care worker, General and Administrative Services,		
and Food Services streams covered by the Award);		
the changes in the nature, level of skill and		
responsibility involved in doing work in residential		
aged care over time and the reasons for those		
changes;		
the increase in the frailty and acuity of the needs of increase in the frailty and acuity of the needs of		
residents in residential aged care, the drivers for this		
increase, the effect on the nature of care provided in		
aged care facilities and the nature of work, skills and		
responsibility required in residential aged care;		
 health benefits arising from the provision of high- level care in the aged care industry; 		
 the effect of shifting towards more individualised, less institutionalised models of care on the nature of 		
work, responsibility and skills required in residential		
aged care;		
changes to regulatory arrangements, quality standards and monitoring of the operation of		
standards and monitoring of the operation of residential aged care facilities that have affected the		
work, responsibilities and skills required in		
residential aged care; and		
residential aged care, and		

	the changes to the expectations, responsibilities and requirements for employees working in residential aged care due to COVID-19. Health	th Servi	ces Union Officia	ls			
WITNESS	SYNOPSIS	DHB Page No.	Link to statement	Cross examined	Specific paragraphs of statement cross-examined on	Link to Transcript Reference	Additional documents taken to
Christopher Friend	The witness is an industrial bargaining officer in the Aged Care Division of the HSU NSW/ACT Branch. The evidence goes his role, the current enterprise agreement bargaining environment and the barriers to enterprise bargaining in the residential aged care sector namely low Award rates, classifications, funding, and COVID-19. The supplementary statement expands on the first statement in relation to the home care setting. The evidence goes to resourcing in the home care sector including 'ageing in place', challenges of home care resourcing and cross-resourcing between home care and residential care, barriers to enterprise bargaining in home care and also goes to the employment profile and skills required.		Amended statement Supplementary statement	Yes	First statement: [8], [16], [18], [22].	26 April 2022 PN873	ACSA Template Enterprise Agreement 2017 (see DHB p.15781)
David Eden	The witness is the Assistant Secretary of the HSU Health Workers' Union Branch in Victoria. He	9028	Statement	Yes	[37]	2 May 2022	-

	previously worked as an EN. The evidence goes to the employers in the Victorian in-home aged care sector, barriers to enterprise bargaining, employment profile and the skills required for in home care workers. The evidence details the day-to-day life of HCWs through the experiences of HWU members 'Employee A' and 'Employee B' which describe qualification and training requirements, wages and conditions of employment, roster, duties, changes over time, financial pressures and staying in the job.					PN3020	
Gerard Hayes	The witness is the President of the HSU as well as Secretary of the HSU NSW/ACT Branch. He was previously an Intensive Care Paramedic with NSW Ambulance. The evidence outlines the background of the HSU, HSU representation, and why the variation to the Aged CareAward is important based on the witness' own experiences throughout his career and discussions with members in the aged care sector and HSU officials. The evidence also discusses the Royal Commission into Aged Care Quality and Safety and the union's involvement in the proceedings.		Statement	Yes	[28] - [30]	26 April 2022 PN519	-
James Eddington	The witness is a legal and industrial officer at the HSU HACSU branch in Tasmania. The evidence discusses his role, employers in the in-home aged care sector, enterprise bargaining and barriers to bargaining in the sector, employment profile, work and skills required of in-home care workers.	9206	Statement Correct annexure 4	Yes	[13], [21], [31], [36], [51], [56], [62], [64].	3 May 2022 <u>PN3491</u>	-

Lauren Hutchins	The witness is the HSU NSW/ACT Branch's Divisional Manager of Aged Care and Disabilities.	8773	Amended statement	Yes	First Statement:	26 April 2022	CHC33015 – Certificate III in
		8878			[21], [43], [45],		Individual Support
	The evidence describes the employers in the aged care		Reply		[48], [49], [51],	<u>PN598</u>	
	sector and the Royal Commission into Aged Care		statement		[58], [76], [80].		(see DHB p.15743)
	Quality and Safety, including the workforce						E E46
	submissions and the Royal Commission's final report.						Form F46 – Amended
	The evidence discusses the proposed changes to the						Application to vary
	Aged Care Award in the HSU's application						a modern award
	(AM2020/99), specifically amending the existing						AM2020/99
	employee level classifications and creating new ones						
	and goes to the working conditions of employees in						HLTHPS006 –
	the industry, the skills required for PCWs, food						Assist clients with
	service workers and administrative workers,						medication
	regulation of the sector, and specialised carers						(goo DIID n 15760)
	including household, dementia, and palliative carers. The evidence also goes to the challenges faced by aged						(see DHB p.15769)
	care workers in adapting to COVID-19, hierarchical						CHCAGE005 –
	nature of career progression and changes in models of						Provide support to
	care, with a shift to making residential home care more						people living with
	'home like'.						dementia
	The reply statement compares the Aged Care Award						(see DHB p.15756)
	and the SCHADS Award, discusses government funding and Federal Government Aged Care						CHCPAL001 –
	payments, the 2022 wage supplement proposal						Deliver care
	brought by the HSU and other peak employer bodies,						services using a
	the StewartBrown Report, the Committee for						palliative approach
	Economic Development of Australia (CEDA) 2021						rrr-swea
	report on meeting the aged care workforce challenge,						(see DHB p.15761)

	training requirements for personal care workers, the witness' involvement in developing the joint statement filed in these proceedings, and the shift in the regulation of the aged care sector.						CHC43415 – Certificate IV in Leisure and Health (see DHB p.15751)
Leigh Svendsen	The witness is the Senior Industrial and Compliance Officer of the HSU and is also an RN. The evidence goes to the history of the predecessor Awards up to the current modern Award and variations post making the Award. The evidence also contains an extensive timeline of the history of the predecessor Awards in the NSW and Victorian systems and Award modernisation process.		Statement	No	-	-	-
Lindy Twyford	The witness is a Senior Vice President of the HSU NSW/ACT Branch and is also employed as Regional Food Services and Dining Manager at the Royal Freemasons Benevolent Institution (RFBI) and is based at the Lake Haven Masonic Village. The evidence discusses RFBI and Lake Haven, her employment history and career progression, changes in food provision over time including the residents' acuity, choice, dining experience, ordering and food service regulators. The witness also provides insight on aspects of the HSU's application that are relevant to food services (specifically paragraphs 21-29 of the application).	9165	Statement Reply Statement	Yes	First statement: [10], [26], [34], [37].	2 May 2022 PN2913	-

Marion Jennings	The reply statement speaks to COVID-19, PPE and changes over time, specifically in relation to cooks. The witness is an organiser for the HSU and prior to this was a Care Service Employee (CSE) at Uniting. The evidence goes to the witness' education and qualifications, her employment history in aged care, about Uniting and the Warratah facility where she worked, the household model of care, training and education, agency workers, funding, her experience working as a CSE including food and beverages, care plans, lockup, showering and dressing residents, safety, communication with residents, administration, urine analysis, dealing with falls, food charts, toileting, walking, medication and supervision. The		Statement Reply statement	Yes	First statement: [13], [14], [18], [41], [42], [44], [71], [75], [81], [102], [114], [169], [185], [194], [195],	2 May 2022 <u>PN2777</u>	-				
	evidence also discusses changes over time, including increased duties for CSEs under the household model of care, changes in residents and increased care needs, supervision, palliative care and changes in technology. The reply statement discusses technology, interaction with families, impact of COVID-19, fatigue and burn out.										
	Australian Nursing and Midwifery Federation Officials										
WITNESS	SYNOPSIS	DHB Page No.	Link to statement	Cross examined	Specific paragraphs of statement	Link to Transcript Reference	Additional documents taken to				

					anaga ayayalırı		
					cross-examined		
					on		
Andrew	The witness is an Industrial Organiser for the ANMF	11127	Amended	Yes	[13], [18], [22],	3 May	-
Venosta	as well as an RN. The evidence goes to his		<u>Statement</u>		[24], [27], [29],	2022	
	qualifications and professional background and				[59], [60], [67],		
	describes his previous roles in depth at different aged				[80], [85], [92],	PN3855	
	care providers. The evidence also goes to the				[98], [129],		
	increasing complexity of clinical care, the consumer						
	directed care model, dementia care, infection control						
	and independent living units. The evidence also						
	speaks to regulation and funding, particularly the						
	Aged Care Accreditation Standards, Aged Care						
	Funding Instrument model, and workforce						
	implications. The evidence discusses the evolution of						
	the nursing care team, medical care, and qualifications						
	and training.						
	u.m.m.g.						
Annie Butler	The witness is the Federal Secretary of the ANMF	9239	Amended	Yes	[161]	2 May	Pre-admission
	and an RN. The evidence goes to her employment,	,,	Statement		[202]	2022	checklist
	history and rules of the ANMF, the Nurses Award						
	and Aged Care Award, defining the aged care sector					PN3348	(see DHB p.15897)
	(home support, home care and residential care), the					11(3310	(See Bill piles)
	Commonwealth Home Support Program (CHSP),						Admission team
	Home Care Packages Program (HCPP) and flexible						checklist
	care services. The evidence also goes to the aged care						OHOOKHISt
	workforce and draws data from the 2003-2016						(see DHB p.15898)
	NACWCS, 2020 Aged Care Workforce Census and						(see Diid p.13030)
	1						Admission day
	2007-2016 NACWCS data which speaks to the						Admission day checklist
	characteristics of employment in residential aged						CHECKHST
	care, the type of employment and hours worked, and						

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compares the residential and home support aged care			(see DHB p.15899)
employment with the nursing workforce and the			
Australian workforce as a whole (2016 data). The			
evidence also discusses the composition of the HCPP			
and CHSP drawn from the 2020 Aged Care			
Workforce Census Report and compares gender, age			
and employment in residential and home support			
aged care with employment in the nursing workforce			
and the Australian workforce as a whole (2020 data)			
and speaks to direct care workforce turnover and			
position vacancies. The evidence also goes to the			
health status and characteristics of residents in aged			
care and comparison of the data collected in the			
2010/11 and 2019/20 Reports on Government			
Services, residential care needs over time, age of			
residents, dementia, cultural diversity and acuity. The			
witness' statement provides an overview of nursing			
in aged care, the skills and personal abilities of the			
aged care workforce, the role and responsibilities of			
the RN, EN, AIN and PCW and the nursing team,			
and discusses the system changes affecting work			
value in aged care including the Aged Care Act 1997,			
'ageing in place', and the rationing of aged care. The			
evidence also goes to inquiries and reviews into aged			
care and the regulatory change in aged care namely,			
the National Code of Conduct for Health Care			
Workers, Accreditation Standards, Aged Care			
Quality Standards (ACQS), National Aged Care			
Mandatory Quality Indicator Program (NACMQIP),			
the Serious Incident Response Scheme (SIRS) and			
restrictive practices legislation.			

Julianne Bryce	The witness is the Senior Federal Professional Officer of the ANMF and has been an RN for 35 years. The evidence goes to her work history and qualifications, professional regulation of nurses, pathway to registration, maintaining registration, scope of practice, and the impact of regulation and registration on the profession.	11150	Statement	Yes	[7], [20]-[23], [42], [43].	3 May 2022 <u>PN3717</u>	-
Kathryn Chrisfield	The witness is the Occupational Health and Safety Unit Coordinator at the ANMF. The witness references WorkSafe Victoria data surrounding the growth in the number of claims in the aged care industry. The evidence goes to resident choice and tenure, building design of aged care facilities, safe resident handling, bariatric residents, occupational violence and aggression, mental health, workload pressures, emotional support, infection prevention and control and home care.	10739	Amended Statement	Yes	N/A	3 May 2022 <u>PN3761</u>	-
Kevin Crank	The witness is an Industrial Officer at the ANMF. The evidence goes to his employment history, aged care services and employers, his experience with enterprise bargaining for aged care nursing staff and describes his customary approach in bargaining for the ANMF on behalf of members and his experience bargaining with specific employers.	10753	Statement	No	-	-	-
Kristen Wischer	The witness is the Senior Federal Industrial Officer of the ANMF. The evidence goes to Award history	9328	Statement	No	-	-	-

	and sets out the timeline of key developments in relation to the application of wage fixing principles in Awards covering RNs, ENs, and AINs in State and Federal jurisdictions and summarises the issues and outcomes of relevant tribunal decisions leading up to the development of modern awards.	10652	Amended further statement				
	Further Statement The evidence goes to Industrial Instrument coverage and comparative wage data, the Nurses Award classification structure, the Aged Care Award classification structure, the SCHADS Award and the Equal Remuneration Order 2012.						
Paul Gilbert	The witness is an Assistant Secretary of the ANMF Victorian Branch. He is also an EN and has previously worked in residential aged care. The evidence goes to his professional background, the history of industrial regulation in the sector in Victoria, an overview of the current bargaining environment in Victorian aged care and the EN's role in relation to medication administration. The evidence also discusses the responses to a 2019 survey the ANMF conducted with Victorian members in aged care and agency nurses as well as the Royal Commission and a 2021 CEDA Paper regarding the aged care workforce challenge.		Amended Statement	Yes	[26], [27], [59], [60].	3 May 2022 <u>PN3975</u>	-

Robert Bonner	The witness is employed as Director, Operations and Strategy at the ANMF's South Australian Branch. The evidence goes to his employment history, the ANMF, the history of the industrial landscape in aged care, working in aged care and the results of a 2019 survey the ANMF conducted with members in aged care, the changes in the aged care sector and the residents, nursing in aged care, the role of personal care assistants and their training and education, the Care Aggregated Model (CAM) and Standard Aggregated Model (SAM) funding system, occupational violence and aggression and technology.		Statement	Yes	[86], [89], [91], [96].	9 May 2022 <u>PN8959</u>	CHC33015 Certificate III Individual Support (see DHB p.15743)
	Unite	d Worke	ers' Union Officia	als			
WITNESS	SYNOPSIS	DHB Page No.	Link to statement	Cross examined	Specific paragraphs of statement cross-examined on	Link to Transcript Reference	Additional documents taken to
Melissa Coad	The witness is the Coordinator Policy, Stakeholder Engagement and Professional Development at the UWU. The evidence largely goes to funding, particularly the Federal funding of home care (Consumer Directed Care), Home CARE Packages, and the funding of residential aged care.		Statement	No	-	-	-

	Health S	Services	Union Lay Witn	iesses			
WITNESS	SYNOPSIS	DHB Page No.	Link to statement	Cross examined	Specific paragraphs of statement cross-examined on	Link to Transcript Reference	Additional documents taken to
Alison Curry	The witness is employed as "AIN thereafter" at Warrigal Mount Terry. The evidence goes to her rate of pay, duties, end of life care, dealing with death related distress, medication, and changes over time. Reply Statement The witness now works on a casual basis at Warrigal and also teaches students studying the Certificate III Individual Support (Ageing) at TAFE. The evidence goes to the impacts of COVID-19, PPE, short-staffing, staff turnover, and disagrees with employer evidence given on a number of topics including the description of the AIN role, changes in technology, changes in work environment, contact with family members, medication supervision, staff involvement in ACFI accreditation process, the NACMQIP and effect of increased administrative burden on RNs, resident expectations, SIRS, and the characterisation of the daily work of an AIN at Warrigal. The evidence also		Statement Reply statement	Yes	First statement: [19], [24], [25], [32]-[34], [46], [80], [84], [96]. Reply Statement: [32], [35], [42], [43], [47], [57], [58], [69], [75], [79].	3 May 2022 PN4316	-

Anita Field	The witness is both a Laundry Hand at Leigh Place Aged Care and a Chef at Australian Unity. The evidence goes to her employment, training history and career progression, describes her tasks and a typical day in her respective roles as a Laundry Hand and Chef, supervision, changes over time and pay.	12334	Statement	Yes	[8], [21], [27]- [29], [31], [32], [35].	6 May 2022 <u>PN7636</u>	-
Antoinette Schmidt	At the time of making the statement, the witness was a Specialised Dementia Care Worker at HammondCare in Miranda. The evidence goes to her employment history, her work in residential care, describes the tasks and skills in relation to personal care, cooking and feeding, administrative duties, medication, and medical procedures. The evidence also goes to engagement, care plans, safety, supervision, changes over time, COVID-19 and her financial circumstances. Reply statement The witness has changed roles and is now a Community Care Worker. The evidence goes to changes as a result of COVID-19, particularly the impact of restrictions on clients, staffing levels, dealing with families, technology, and changes over time.	11708	<u>Reply</u> <u>statement</u>	Yes	First statement: [7],[9-11],[25], [33], [36], [42], [48], [49], [55], [77], [82]. Annexure AS-1	4 May 2022 PN4937	-
Bridget Payton	The witness is a Personal Care Assistant at SAI Home Care. The evidence goes to qualification and training requirements, wages and conditions of	12933	Statement	Yes	First statement: [12], [23], [46], [80], [82], [102].	5 May 2022 PN6371	-

	employment, roster and duties, impacts of COVID- 19, financial pressures and staying in the job. Reply Statement The evidence goes to home modifications, assistive technologies, rostering and recording technologies and other costs particularly travel time.	12954	Reply Statement		Reply statement: [12], [14].		
Camilla Sedgman	The witness is a Personal Support Worker at RSL LifeCare in Far North NSW and has worked in the sector for 11 years. The evidence goes to her employment history, qualification and training requirements, wages and conditions of employment, roster and duties, impacts of COVID-19, financial pressures and staying in the job.	12363	Statement	Yes	[10], [11], [33].	4 May 2022 <u>PN5146</u>	-
Carol Austen	The witness is a Care Worker at Uniting and works in the Servery. The evidence goes to her work history with Uniting, ordinary pattern of work, changes over time, interacting directly with residents, COVID-19 and pay.	11633	Amended statement	Yes	First statement: [23], [25], [26],	29 April 2022 <u>PN2349</u>	-
	Reply Statement The evidence goes to COVID-19, staffing and turnover, changes to the role of kitchen staff over time, person-centred care and technology.	11642	Amended reply statement				
Catherine Evans	The witness is a Home Service Worker at Regis Home Care in Mildura. The evidence goes to her	12842	Statement	Yes	First statement:	5 May 2022	-

	employment history, qualification and training requirements, wages and conditions of employment, roster and duties, changes in the work over time, financial pressures and staying in the job. Reply Statement The witness is still a Home Service Worker with Regis however has transferred to Tasmania. The evidence goes to home modifications and assistive technologies and rostering and recording technologies.	12870	Reply statement		[18], [19], [21], [38], [39], [41], [45], [48], [52], [59]. Reply statement: [10].	<u>PN6106</u>	
Charlene Glass	The witness is a Carer at Anglicare, Newmarch House. The evidence goes to her work at Newmarch, PPE, quarantine, typical care responsibilities, the increased responsibility and challenges faced during COVID-19 in providing effective care for residents, the effect of COVID-19 on carers, and pay. Reply Statement The witness has transitioned into an Administrative Assistant role at Newmarch. The evidence discusses her new role, training for the new role, increased workload, COVID-19, specifically lockdowns and the impact on residents and staff, PPE, and staffing levels.	11613	Statement Reply statement	Yes	First statement: [51] Reply statement: [8], [9], [13]	5 May 2022 PN6699	-
Darren Kent	The witness is the Chef at a Warrigal's Calwell facility in the ACT. The evidence goes to his education and qualifications, employment history, the Calwell facility, the catering services workforce, duties, a typical work day, meal planning, ACQS and	11880	Statement	Yes	First statement: [4], [13], [24], [28]-[31], [34], [35], [39], [45],	6 May 2022 <u>PN7312</u>	-

	changes to the job over time, in particular, being responsible for more management duties, more accountable for the catering department's performance, expectation of restaurant quality food, preparing a variety of foods and from different cultures, catering to individual dietary requirements and increased contact with residents. Reply Statement The evidence goes to the impact of COVID-19, short staffing, changes in technology, engagement with family, and changes over time to the roles of catering assistants (GSOs) and chefs/cooks.	11945	Reply statement		[46], [50], [51], [83], [86], [88].		
Donna Kelly	The witness is employed as an Extended Care Assistant at Baptcare Karingal Community Care in Tasmania. The evidence goes to her employment history and career progression, the Karingal facility, describes her tasks, skills and a typical day, supervision, changes over time, specifically that residents have higher care needs, medication provision, COVID-19, and her financial circumstances. Reply statement The evidence goes to COVID-19, lockdowns, contact with families and dealing with residents, medications, and technology.	11864	Reply statement	Yes	First statement: [17], [21], [39].	29 April 2022 <u>PN1749</u>	-

Fiona Gauci	The witness is an Administrative Officer at Uniting Edinglassie Emu Plains and was previously an AIN. The evidence goes to her employment with Uniting, employment history and career progression, training history, duties and skills as an administrative officer, care planning and care delivery, communication and interpersonal skills, culturally diverse residents, supervision, COVID-19 and changes over time including technology, higher care needs of residents, and dealing with dementia patients.	11954	Statement	Yes	First statement: [28]. Reply statement: [15].	29 April - 2022 PN2139	
	Reply Statement The witness' statement provides that Uniting has since changed its model of care to the 'household model' and the witness' role has changed to Leisure and Wellness Coordinator. The evidence describes her new role, impacts of COVID-19, including PPE requirements and PPE training, resident visits, outbreaks, current restrictions in place at Uniting, staffing levels, and responds to aspects of employer evidence she disagrees with in relation to new technology and level of engagement with family members.	11964	Reply statement				
Helen Platt	The witness is a Care Supervisor at Anglicare, Melva MacDonald Lodge and has worked in aged care for 11 years. The evidence goes to employment history and career progression, training history, typical working day, supervision, COVID-19 and changes over time particularly staffing levels.	11604	Statement	Yes	[11], [14], [15], [28]-[30], [37], [55], [69], [72].	4 May - 2022 PN4744	

Jade Gilchrist	The witness is employed as a Lifestyle and Volunteer Coordinator at Clifton Community Health Service. The evidence goes to employment and qualifications, terms and conditions of her employment, the CCHS facility, and describes her duties in relation to planning, scheduling, designing and running recreational activities. The evidence also goes to paperwork, benefits of providing recreational activities to residents, supervision, and the impact of COVID-19 on her role, staff and residents. Reply statement The witness was made redundant in October 2021. The evidence elaborates on the impacts of COVID-19 on running lifestyle and recreational activities, staffing levels and disagrees with employer evidence regarding technology and notes that the widespread use of new technology created additional duties for her and required her to teach and assist staff, residents and families with new technology.	12019	Amended reply statement	Yes	First statement: [5], [16], [37], [43].	29 April 2022 PN1886	CHC33015, Certificate III in Individual Support (see DHB p.15743) HLTHPS006, Assist Clients with Medications (see DHB p.15769) HLTHPS007, Administer and Monitor Medications (see DHB p.15775)
Jennifer Wood	The witness is employed as a Support Worker for Uniting Home & Community Care Nepean and has worked in the sector for 11 years. The evidence goes to her employment history, qualifications and training, wages and conditions of employment, roster and duties, description of a recent day at work, challenges of the job and changes over time and describes multiple interactions with clients who have difficult behaviours and/or conditions and the	12381	Amended statement	Yes	[55].	4 May 2022 <u>PN5540</u>	-

	sometimes-unsafe nature and emotional toll of the work. The evidence also goes to the impacts of COVID-19, financial pressures and staying in the job.						
Josephine Peacock	The witness is currently a Volunteer Coordinator at HammondCare and prior to this she was a Recreational Activities Officer (RAO), and later a Diversional Therapy and Volunteer Manager at Harbison between 1996-2019. The evidence goes to her employment background and qualifications, describes her previous roles at Harbison in detail and discusses Harbison's lifestyle program, social and lifestyle profile/assessments, planning, programming, and facilitating activities, evaluating the program and her managerial responsibilities. The evidence also goes to her current role at Hammond Care, the complexity and depth of activities, examples of making a difference, role of RAOs in identifying care issues, resident engagement, planning and programming in a way that supports engagement, considering the spectrum of resident needs, history of the profession and key changes over time.	12031	Statement	Yes	[2]-[4], [27], [31], [34], [37], [40], [42], [61].	4 May 2022 PN4643	-
Julie Kupke	The witness was employed as a Carer at Absolute Care & Health at the time of making the statement however advised in the course of giving evidence that she is now in the role of disability support worker. She has worked in aged care for 15 years, predominantly as a chef. The evidence goes to her	12908	Statement	Yes	[17], [18].	4 May 2022 <u>PN5445</u>	-

	employment history, qualification and training requirements, wages and conditions of employment, roster and duties, describes a typical working day, changes in the work over time, particularly the increase in clients with high care needs and the additional responsibilities placed on carers, impacts of COVID-19, financial pressures and staying in the job.						
Kathleen Sweeney	The witness is an Administration Officer at Huon Regional Care in Tasmania. The evidence goes to her employment history and career progression, training history, the Huon Regional Care facility, describes her tasks and skills, admitting residents and patients, rostering, administrative duties, supervision, changes over time and COVID-19.	12001	Statement	Yes	First statement: [9], [11], [16]- [19], [21], [24], [25], [28], [29], [31], [33], [37].	5 May 2022 <u>PN7002</u>	-
	Reply statement The evidence describes the impacts of COVID-19 in relation to the check in process, rapid antigen testing for staff, volunteers and contractors, and the impact on residents, the expansion of her administration duties, taking on additional Extended Care Assistant duties, and technology.	12009	Reply statement		statement: [41], [53], [56].		
Kerrie Boxsell	The witness is a Care Staff Team Leader at Evergreen Life Care in NSW. The evidence goes to her education and qualifications, employment at Evergreen, hours of work, duties, describes a typical day as a care staff employee and team leader,	12343	Amended Statement	Yes	First statement: [4], [5], [17], [27], [31], [33],	29 April 2022 <u>PN1969</u>	-

	supervision, COVID-19 and changes over time including frailer residents, increased communication with health professional staff, and the shift from paper-based work to digital systems. Reply Statement The evidence goes to the impact of COVID-19 in relation to testing tents, PPE, staffing levels, restrictions on family visitation, emotional and recreational support for residents and new skills and technology.	12357	Reply statement		[34], [38], [40], [50], [65],		
Kevin Mills	The witness is a Gardener at Warrigal (Albion Park Rail, Albion Park and Mount Warrigal facilities). The evidence goes to his employment background and qualifications, hours of work, duties, engagement with residents, design of gardens, and providing general assistance to carers.	11995	Statement	Yes	[6], [10], [16], [27].	9 May 2022 <u>PN10083</u>	-
Kristy Youd	The witness is employed as an Aged Care Employee, Level 4 at Masonic Care Tasmania, Fred French facility, and has worked in aged care for 16 years. The evidence goes to her employment history and career progression, training history, describes her tasks, skills and a typical morning shift, supervision, changes over time, COVID-19 and dealing with violent residents.	11976 11985	<u>Statement</u> <u>Reply</u>	Yes	First statement: [25], [30].	4 May 2022 <u>PN5350</u>	-
	Reply statement		<u>statement</u>				

	The evidence goes to changes in her hourly rate, COVID-19, specifically lockdowns, testing requirements, impact on staff and residents, PPE, staffing levels, and increased workload, and disagrees with employer evidence regarding the introduction of technology.						
Lorri Seifert	The witness is a Team Leader at Illawarra Retirement Trust (IRT) and has worked in the sector for 2 years. The evidence goes to her employment history, education and training, wages and conditions of employment, IRT services and workforce, her duties and expands on supervision of staff, monthly team meetings, ensuring staff service requirements are up to date, management of staff personal development, management of staff performance and disciplinary matters, WHS matters, recruitment and monthly reporting. The evidence also goes to supervision, changes to the work over time, financial pressures and staying in the job.	12500	Statement	No	-	-	-
Lyn Cowan	The witness is a PCW at Bolton Clarke Residential Aged Care in QLD. The evidence goes to her education and qualifications, employment history and describes her duties in her previous roles as a cook and a PCW at other facilities, her current duties at Bolton Clarke, her hours of work, care plans, a typical day as a PCW, culturally competent care, medication, post-surgery care/recovery, supervision, safety, changes in the industry and COVID-19.	12114	Statement	Yes	First statement: [3], [15], [21], [26], [83], [99], [109].	3 May 2022 <u>PN4087</u>	-

	Reply statement The evidence goes to further COVID-19 measures which have impacted staff and clients including questionnaires, PPE, cleaning, disinfecting, specific COVID training, and speaks to the emotional toll of COVID on residents and their families, staffing levels, and disagrees with employer evidence regarding the introduction of technology.	12253	Reply statement				
Lynette Flegg	The witness is a Senior Administration Officer at Marian Nursing Home operated by Southern Cross Care, which specialises in caring for residents with complex mental and physical needs. The evidence goes to her employment, her duties when she started in the role in 2010 and the additional duties she performs now, describes a typical day and occasional duties performed, supervision and decision making, interaction with residents, additional responsibilities associated with COVID-19 and financial difficulties.	12261	Statement	Yes	First statement: [11], [12], [17]- [20], [25], [26]. Reply statement: [16], [25].	5 May 2022 <u>PN5765</u>	-
	Reply Statement The evidence goes to changes brought about by COVID-19 and their impacts, including dealing with family members and complaints, staffing shortages and conducting rapid antigen tests on visitors. The evidence also goes to technology and disagrees with some employer evidence regarding the introduction of technology.	12284	Reply statement				

Marea Phillips	The witness was a Community Support Worker with South-East Community Care in Tasmania until she resigned in February 2021. The evidence goes to her employment history, qualifications and training, the work performed and dealing with complex clients, the work environment, changes due to COVID-19, reporting and care, earnings and budget and work value.	12638	Statement	Yes	[17].	5 May 2022 <u>PN6912</u>	-
Mark Castieau	The witness is a Chef at St Vincent's Care Services in Edgecliff, NSW. The evidence goes to his qualifications, employment at St Vincent's, duties, training, hours of work, describes a typical day which involves ordering stock, reviewing menus, staff meetings, food preparation, supervision of team members, food service and closing the kitchen. The evidence also goes to food safety, audits, impact on residents, budgeting, use and impact of software, palliative care, changes to the residents and the role over time, COVID-19 and pay. Reply Statement The witness still works as a chef but has transferred to a different facility. The evidence goes to the impact of COVID-19 on his role, interaction with residents and families, staff turnover, and changes to the catering assistant/kitchen hand role over time.	12047	<u>Reply</u> <u>statement</u>	Yes	First statement: [5], [11], [12], [30], [36], [38], [44], [61], [82], [90], Reply statement: [28],[29].	29 April 2022 <u>PN974</u>	SIT30816, Certificate III in commercial cookery (see DHB p.15877) IDDSI Framework – International Dysphagia Diet Standardisation Initiative (see DHB p.15883) Redacted care plan (see DHB p.15884)
Michael Purdon	The witness is a Community Care Worker at South Eastern Community Care and has worked in the	12712	Amended statement	Yes	[6], [25], [39].	6 May 2022	-

	sector for 5 years. The evidence goes to qualification and training requirements, wages and conditions of employment, roster and duties, describes a number of experiences with different clients, changes over time, financial pressures and staying in the job.					<u>PN7539</u>	
Michelle Harden	The witness is currently a Recreational Activities Officer (RAO) at RFBI and has previously worked in the laundry service, as a cleaner, in administration and in catering. The evidence goes to education, duties as an RAO, describes a typical day, responding to challenges, deteriorating health of residents, coordination of volunteers, special events and activities, individual support for residents, interactions with families, impact of leisure activities on residents, changes over time and the impact of COVID-19. Reply statement The evidence goes to the impacts of COVID-19 on her role, PPE, contact with family members, staffing levels, care plans and government retention payments.	12289	<u>Reply</u> <u>statement</u>	Yes	[6], [7].	4 May 2022 PN4859	-
Pamela Little	The witness is an Administration Officer, Grade 5 at Uniting Wirreanda West Pennant Hills. The evidence goes to her employment, the Uniting facility, employment and training history, duties, tasks and skills, describes a typical day, supervision, changes over time including increased responsibility,	11834	Statement	Yes	First statement: [28], [43].	29 April 2022 <u>PN2284</u>	Uniting Aged Care Enterprise Agreement (NSW) 2017 (see DHB p.16098)

	regulatory changes and technological advancements, COVID-19 and financial circumstances. Reply statement The evidence largely goes to the impact of COVID-19 on Uniting and her role, flu vaccinations and changes to the role of administrative staff over time.	11852	Reply statement				
Paul Jones	The witness is a Care Services Employee at United Protestant Association NSW Ltd. The evidence goes to employment history, his role and skills which includes assessing the needs of residents and developing care plans, medication rounds, assisting with dinner and bed time, monitoring changing care needs and communication skills. The evidence also goes to changes over time, supervision, COVID-19 and salary. Reply Statement The evidence goes to changes brought about by COVID-19, medication, and disagrees with employer evidence about the introduction of new technology and the level of interaction that PCWs have with families.	12316 12327	Reply Statement	Yes	First statement: [9], [12], [19], [25], [28], [30], [31], [49]. Second statement: [24].	29 April 2022 PN1244	-
Peter Doherty	The witness is a Coordinator at St Andrews Community Care in Ballina NSW and previously worked for the UWU representing in-home aged care workers. The evidence goes to employment history, education, wages and conditions of employment, St	12419	Statement	Yes	[34], [41], [44], [52], [57], [78], [89], [93], [104], [116], [133],	5 May 2022 <u>PN6012</u>	-

	Andrews services and the workforce, describes his role and duties which includes rostering, client care plans, managing client calls and complaints, managing and supervising home carers, management of WHS issues, recruitment and reporting. The evidence also goes to challenges of the job, supervision, changes in the work over time including the lack of staff and increased demand for home care services, and also speaks to financial pressure and staying in the job.					Recalled at PN6258	
Sally Fox	The witness is employed by Huon Regional Care as an Extended Care Assistant at Tasman Health & Community Service. The evidence describes the facility, her education and qualifications, employment history, her current role, the types of shifts she works and the duties performed, including reception shifts, community/in-home care shifts, extended care assistant shifts, and leisure and lifestyle shifts. The evidence also goes to supervision, financial circumstances, and changes to her role predominantly increased workload and the increase in residents with complex care needs. Supplementary Statement The evidence expands on her first statement in relation to work specifically in the home care setting and goes to employment history, training, in-home care, changes to the work overtime, reporting and record keeping, and financial circumstances.	12524 12542 12628	Supplementary statement	No	-	-	-

	Reply Statement The evidence goes to basic life support training, COVID-19 and lockdowns, staffing, training and additional duties, check in processes, infection control and disagrees with employer evidence about the level of interaction PCWs have with families.		Reply statement				
Sandra O'Donnell	The witness is a Laundry Assistant at RSL LifeCare, Thomas Eccles Garden in NSW and has worked in the sector for 26 years. The evidence goes to her employment history, Thomas Eccles Garden facility, training and qualifications, her current roster, tasks and responsibilities, resident violence and aggression, changes over time including COVID-19 related changes and the impact of low pay.	11646	Statement	Yes	First statement: [15], [19], [24], [26], [34], [38], [54], [71], [73]- [77], [84], [102].	5 May 2022 <u>PN6481</u>	-
	Reply statement The evidence goes to COVID-19, PPE, rapid antigen testing, residents' attitude to isolation, workload, staffing levels, easing of restrictions, dealing with families, the government bonus and technology.	11656	Reply statement				
Sanu Ghimire	The witness is a Care Services Employee and Recreational Activities Officer at Uniting Aged Care in NSW. The evidence goes to her employment, education and qualifications, duties and skills, resident behaviour, changes in aged care, particularly that her role has become more challenging and that residents are older and frailer, the impacts of COVID-19 and pay.	11592	Amended statement	Yes	First statement: [12], [13], [17], [18], [44].	4 May 2022 <u>PN5256</u>	-

	Reply statement The evidence goes to the impact of COVID-19 on her recreational officer and personal care work duties, staff shortages and burn out.	11599	Reply statement				
Susan Digney	The witness is a Support Worker at Integrated Living Australia. The evidence goes to her employment history, qualifications and training, describes the work performed, personal emotional toll of the work, work environment and clients' homes, reporting and supervision, and work value.	12440	Amended statement	Yes	[10], [11], [13]	3 May 2022 <u>PN4456</u>	-
Susanne Wagner	The witness is a Support Worker at Community Based Support in Tasmania. The evidence goes to her employment history, qualifications, her employer, extensively describes her duties and work performed, changes to clientele, workplace challenges, WHS and clients' homes and work value.	12725	Statement	Yes	[5], [8], [11], [15], [24], [28]- [30], [32], [40]- [43], [46], [57], [58], [82].	10 May 2022 <u>PN10219</u>	-
Theresa Heenan	The witness is a home care employee at Warramunda Village in Victoria as well as a disability support worker with Community Living & Respite Services. The evidence goes to her employment history, qualifications and training, wages and conditions of employment, roster and duties, changes in the work over time, impacts of COVID-19, financial pressures and staying in the job.	12875 12903	Statement	Yes	First statement: [6], [16], [19], [20], [37], [42], [55], [60], [72], [75], [78], [81], [82], [85], [93], [94], [103].	6 May 2022 <u>PN7866</u>	-

	Reply statement The evidence goes to home modifications and assistive technologies, rostering and recording technologies and reduced support.		Reply statement		Reply statement: [8], [9].		
Tracy Roberts	The witness is employed as a kitchenhand and carer at Respect Group. The evidence goes to education and qualifications, the Respect Group facility, employment history, describes the duties undertaken in her previous roles as a cleaner and a chef as well as her current duties as a kitchen hand and carer, medication, handovers, lifestyle assistant duties, supervision, changes over time, technology, COVID-19, and financial impact. The reply statement provides that the witness has resigned and no longer works in aged care.	11575	Statement Reply statement	No	-	-	-
Veronique Vincent	The witness is a Home Support Worker at Regis Home Care Mildura. The evidence goes to her employment history, qualification and training requirements, wages and conditions of employment, roster, duties, range of work performed and a typical day, challenges and demands of the job, changes in work over time particularly the increase in duties, expectations and needs of clients, impacts of COVID-19, financial pressures and staying in the job.	12959	Amended statement	Yes	[33], [35], [52], [66], [90], [104], [108], [119].	4 May 2022 <u>PN5646</u>	Redacted care plan (see DHB p.16007)

Virginia Ellis	The witness is employed as a Homemaker at Uniting	11528	Statement	Yes	First	29 April -	
virginia Ems	1 · · · · · · · · · · · · · · · · · · ·	11320	Statement	168		<u>-</u>	
	Aged Care's Springwood Facility in NSW and has				Statement:	2022	
	worked in the sector for 15 years. The evidence goes				[25], [31], [32],	D111.10.5	
	to her employment history and career progression,				[34], [43], [53],	<u>PN1405</u>	
	training history and qualifications, describes the				[60], [62], [66],		
	tasks, skills and a typical day as both a care worker				[67], [88], [113],		
	and a team leader in the dementia ward, dispensing				[118]-[124],		
	medication, supervising and training staff, keeping				[154], [173].		
	records, dealing with family members, and increased						
	workload. The evidence also goes to her current role						
	as homemaker and a typical day including						
	medication rounds, dealing with doctors, personal						
	care, catering, cleaning duties, activities, paperwork						
	and administration, supervising care workers, health						
	and safety, and dealing with different cultures and						
	disabilities. The evidence also discusses care plans,						
	palliative care, supervision, changes over time,						
	changes in the health of residents and impacts of						
	COVID-19.	11563	Donly				
	COVID-19.	11303	Reply				
	Donly statement		statement				
	Reply statement						
	The evidence goes to the difficulties caused by						
	COVID-19, the Aged Care Funding Instrument and						
	SIRS. The witness disagrees with employer evidence						
	in relation to technology and interaction with families						
	and specifically responds to the following employer						
	evidence:						
	 Mark Sewell's statement at [84]-[87], [96], 						
	[100]-[104] and [107]-[112];						
	• Kim Bradshaw's statement at [29]- [30];						

Eugene Bascuik	 Johannes Brockhaus' statement at [38]-[40], [42], [44], [45], [54]-[56], and [77]; Craig Smith's statement at [31], [33] and [43]; and Emma Brown's statement at [33], [34], [45]-[50] and [72]-[75]. The witness is employed as a Maintenance Tradesperson (specialising as an electrician) at Bundaleer Care Services in NSW. The evidence goes to employment history, qualification, duties and a typical day at work, training, supervision, interaction with residents and families, accreditation, changes in aged care over time, technology and impacts of COVID-19 on his role. 	12990	Statement	Yes	[7], [8], [11], [12], [16], [20], [24]-[27], [29], [30], [35], [36], [38], [43], [44], [45],[49], [51], [52], [56]-[58] and [62].	2 June 2022 PN14000	-
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	Australian Mulsing	anu wnu	wiiery rederatio	n Lay witne	esses		
WITNESS	SYNOPSIS	DHB Page No.	Link to statement	Cross examined	Specific paragraphs of statement cross-examined on	Link to Transcript Reference	Additional documents taken to

	of life and greater acuity. The evidence also goes to the skills and responsibility of staff, difficult work conditions such as violent residents, lack of staff and COVID-19 and general observations about the value of her work.						
Dianne Power	The witness has worked in aged care for approx. 9 years and is employed as a Level 3 AIN at Regis Whitfield. The evidence goes to her work history and qualifications, describes her role, her work and a typical morning shift, the nature of the work specifically that it is physically demanding, the residents' needs are more complex, and there is increased pressure and workload. The evidence also goes to skills and responsibility, work conditions including aggressive residents and impact of COVID-19, her perceptions of the aged care industry and her involvement as a bargaining representative for their enterprise agreement.	13102	Statement	Yes	[12], [19], [20], [22], [25], [31], [32], [39], [47], [51], [59], [80], [81].	9 May 2022 <u>PN9397</u>	-
Hazel Bucher	The witness was General Manager Clinical Services Nurse Practitioner at Southern Cross Care Tasmania Inc. up until 22 April 2022. The witness is also a casual tutor at Tasmania University in the Mental Health Wellbeing and Dementia Care Post Graduate Unit and works part-time at a private memory clinic she runs. The evidence goes to her work history and qualifications, her role and work performed, the work of RNs, ENs and carers in aged care and speaks to its stressful nature, the difficulty in supporting new and	13117	Amended Statement	No	-	-	-

	inexperienced RNs, the Aged Care Quality and Safety Commission, care plans, and increased complexity in needs of residents, The evidence also goes to how the work has been influenced by changes in staffing levels, increased acuity of residents, regulation of the sector, higher expectations of families and residents and increased need for quality palliative care provision and how these changes have directly impacted the work of RNs, ENs and carers by delegating responsibilities from senior RNs to less experienced (and fewer) staff, increasing the intensity and complexity of the work performed and the difficulty of the physical settings in which care is provided. The witness' evidence concludes with general comments about the industry.						
Irene McInerney	The witness works as Registered Nurse In Charge (RNIC) at the Salvation Army's "Barrington Lodge Aged Care Centre" in Hobart. The evidence goes to her work history and qualifications, describes her role and work performed, nature of the work, the increased and complex needs of residents including wound care, medication, pain management, infection control and prevention, food and hydration, continence care, dementia care, mobility and falls, social support, quality of life, palliative care and greater acuity. The evidence also goes to reporting, staffing levels particularly the decline in number of	13139	Amended Statement	Yes	[15], [16], [31].	10 May 2022 <u>PN10976</u>	-

	RNs, increased pressure, demand, skills and responsibility and work conditions.						
Jocelyn Hofman	The witness is am RN at Bodington Aged Care Facility and has worked in aged care for 34 years. The evidence describes her role, work and a typical shift, changes in the work over time including staffing changes, particularly the decline in the number of RNs, increased complexity and acuity of residents and in turn the greater nursing skills required, expectations of the care, communication and PPE. The evidence also goes to enterprise agreement bargaining.	13151	Statement	Yes	[21].	9 May 2022 <u>PN9584</u>	-
Lisa Bayram	The witness works as a Registered Nurse After Hours Coordinator or RN in charge at Blue Cross Grossard Court. The evidence goes to her work history, training and qualifications, the Grossard Court facility, staffing on shift, a typical PM shift, nature of the work including care plans, advanced care directives, medications, COVID-19, infection control, food nutrition and hydration, continence, dementia, mobility, falls and restraint, documentation and changes to her role. The evidence also goes to skills, responsibility, and work conditions, particularly lack of resources and critical incident management.	13226	Statement	Yes	[7], [10], [12], [27], [43], [59], [83], [89].	6 May 2022 PN8031	CHC33015 Certificate III Individual Support (see DHB p.15743)

Linda Hardman	The witness is employed as a Nursing Assistant at Estia Health Facility in Figtree and has been an AIN for 20 years. The evidence goes to her work history and qualifications, describes her role and work, changes in the work of AINs over time including acuity of residents, documentation, resident choice, dementia and difficult behaviours, increased expectation of training and qualifications, staffing and interactions with other health practitioners. The evidence also goes to enterprise bargaining and additional comments about the value and perception of work in aged care.	13265	Amended Statement	Yes	[11], [15], [20]- [22], [34]-[41], [46].	9 May 2022 <u>PN9780</u>	-
Maree Bernoth	The witness has been a RN for 28 years and is an Associate Professor in the School of Nursing, Paramedicine and Healthcare Sciences at Charles Sturt University. The evidence goes to her work history and qualifications, the nature of the work, skills, responsibility and working conditions in aged care and expands on resident acuity, documentation, palliative care, psychotropic drugs and restraint, dementia and occupational violence and aggression, skill mix, dealing with families, continence, communication, cultural diversity, technology and medication aides, and the physical and mental impact of the work on carers. The evidence concludes with general comments about the value of aged care work.	13276	Statement	No	-	-	-
Patricia McLean	The witness has worked in aged care for 43 years and worked as an Enrolled Nurse, Level 2 at Blue Care	13303	Amended Statement	Yes	N/A	9 May 2022	-

	until she resigned on 26 July 2021. The witness now works for the QNMU. The evidence goes to her work history, qualifications and training, describes her role and work in residential care at Brookfield Village and in community care at Blue Care, the nature of her work including complexity, care plans, documentation and reporting, physical and emotional demands, scheduling of work, general changes, diverse backgrounds of clients and additional client care. The evidence also goes to skills and responsibility, including clinical work, time management, IT, working with other staff and skill mix, additional skills and training, interaction with other health professionals, medication and pain management, client behavioural management, and additional steps regarding client welfare. The evidence also goes to work conditions including client homes, occupational violence and aggression, infection control, injuries and illness sustained from work, interactions with people aside from clients and residents, and transport.					<u>PN9665</u>	
Pauline Breen	The witness has worked in aged care for 15 years and is employed at RSL LifeCare in Mullumbimby. The evidence goes to her work history and qualifications, describes her role and work, the nature of her work, skills and responsibility, work conditions, and additional comments about the value of her work.	13347	Amended Statement	No	-	-	-

Rose Nasemena	The witness is a Personal Care Assistant at BUPA in Bonbeach and has worked in aged care for 13 years. The evidence goes to her work history and qualifications, describes her role, work and a typical PM shift, skills and responsibility, changes in the work such as increased number of residents with dementia and high care needs, providing assistance with medication, increase in frailty of residents, technological advancements, fewer RNs and COVID-19, and her perception of aged care.	13354	Amended Statement	Yes	[5], [10], [24], [29], [32], [33], [35], [36], [43], [51].	6 May 2022 <u>PN8479</u>	-
Sherree Clarke	The witness is an AIN at Opal HealthCare at Morayfield Grove and has worked in aged care for approx. 24 years. The evidence goes to her work history and qualifications, describes her role and AIN work on a usual weekend shift and her additional relief Lifestyle Worker role during 2015-2020. The evidence also goes to skills and responsibility, and the work conditions such as heat, physical and mental demands, increased workload, and infection exposure.	13365	Statement	Yes	[7], [39], [44], [45], [49].	9 May 2022 <u>PN9899</u>	-
Stephen Voogt	The witness is a consultant Nurse Practitioner and does work for approx. 10 GPs and two private aged care facilities in Wangaratta. The evidence goes to his work history and qualifications, the inadequate services from GPs into aged care facilities, the insufficient resources to fund non-pharmacological strategies for restraining residents, the limited external support and advice for staff and residents in	13391	Amended Statement	Yes	[21], [26], [27], [39], [52].	9 May 2022 <u>PN9272</u>	-

	private aged care in dealing with dementia, violent residents, high expectations of families, staffing levels, the impact of ACQS on nurses and carers due to limited funding and increased regulation, the increase in bariatric residents, palliative care and residents with overall more complex needs, and increased responsibility of PCWs. The evidence also speaks to the changes being made to benefit the resident and the lack of resources to properly effect these changes, as well as the witness' experience with the management of COVID-19 outbreaks in residential aged care facilities.						
Suzanne Hewson	The witness is an EN at Southern Cross Care, Labrina Village. The evidence goes to her work history and qualifications, describes her role, work and a typical morning shift, the nature of the work and working conditions, particularly the increased complexity of residents' care needs and the skills required to meet them and discusses medication, nutrition and hydration, dementia care, social support, palliative care and increased acuity.	13417	Amended Statement	Yes	[10], [17], [22], [24].	6 May 2022 <u>PN8267</u>	-
Virginia Mashford	The witness has worked as an AIN for 28 years in both public and private aged care and currently works at Regis Aged Care Wynnum. The evidence goes to her work history and qualifications, describes her role and the work performed on a typical afternoon shift, nature of the work, skills and responsibility, work conditions, enterprise agreement	13425	Amended Statement	Yes	[22], [26], [36], [44].	6 May 2022 <u>PN8348</u>	-

	and comments on the value of her work.						
Wendy Knights	The witness is a casual EN at Princes Court Homes in Mildura. The evidence goes to her work history and qualifications, staffing at Princes Court and her role, describes her role, changes to the nature of aged care work including increased acuity, medication, technology, difficulties with dementia, incident reporting, documentation, changes after the Royal Commission in relation to pain relief and restraint medication, cultural diversity of residents and carers, interaction with families, visitors and allied health professionals, COVID-19, end stage care and notes further miscellaneous observations about the nature of the work. The evidence also goes to work conditions and enterprise bargaining.	13438	Amended Statement	Yes	[11], [14], [22], [25], [27], [28], [40], [49], [56], [64], [92].	9 May 2022 <u>PN9116</u>	-
	United V	Vorkers'	Union Lay Witn	iesses			
WITNESS	SYNOPSIS	DHB Page No.	Link to statement	Cross examined	Specific paragraphs of statement cross-examined on	Link to Transcript Reference	Additional documents taken to
Catherine Goh	The witness is a Community Support Worker at the Brightwater Care Group and was previously a social worker. The evidence goes to her employment background and history, training, the nature of the work, changes over time including increased age of clients, domestic services, the focus on consumer	13493	Statement	Yes	[2], [4], [5], [7], [13], [22].	10 May 2022 <u>PN10638</u>	-

	directed care and increased reporting and also speaks to the pay and conditions.						
Geronima Bowers	The witness began working for Brightwater Care Group in hospitality services in 2006 and transitioned into a PCW role in 2007. Her evidence goes to her qualifications, the changes in her role over time including staffing levels, working with dementia, medication administration, technology and reablement.	13487	Statement	Yes	[5], [8], [12]- [15], [17]-[20], [23], [32], [34].	11 May 2022 <u>PN11803</u>	-
Judeth Clarke	The witness has worked in the aged care industry for 48 years and is currently employed as a PCW at Baptistcare. The evidence outlines her care duties in her current role, changes in the industry over time, and how her role and work has changed over time in relation to medications and wound care, reablement work and technological advancements regarding equipment and training delivery.	13462	Statement	Yes	[5], [11], [12], [13], [21].	11 May 2022 <u>PN11970</u>	-
Karen Roe	The witness works as a Home Support Team Member at the Benevolent Society, Hurstville office and has worked in the sector for 17 years. The evidence goes to training and qualifications, the work and skills required, challenges in dealing with clients with mental health issues and dementia, and the financial challenges for both workers and clients.	13508	Statement	Yes	[7], [9]-[12], [15], [16], [22].	11 May 2022 <u>PN11371</u>	-
Lillian Grogan	The witness has worked in the aged care industry for 27 years in various roles and is employed as a Care	13514	Statement	Yes	[16], [18].	10 May 2022	-

	Worker Coach. The evidence goes to her employment history, describes the work performed, the wide range of skills and competencies required for the job, the stressful nature of the job and the impact of COVID-19 on working conditions.					PN11237	
Lyndelle Parke	The witness has worked in the industry for over 35 years and is currently employed as a community PCW with Australian Regional and Remote Community Services. The evidence goes to her duties and a typical day at work, qualifications, and discusses the major changes in her role over time, namely medications, wound care, and the increase in clients with serious health and behavioural conditions.	13475	Statement	Yes	[11], [12], [20]	11 May 2022 <u>PN11681</u>	-
Maria Moffat	The witness is employed as a Personal Carer for Australian Unity and has worked in the sector for 13 years. The evidence describes her current employer, training, work performed, the negative impacts of COVID-19 and travel time between client visits.	13519	Statement	Yes	[7], [8], [14], [15], [33], [35] [39], [40].	10 May 2022 <u>PN10882</u>	-
Ngari Inglis	The witness is employed as a Home Support Worker at Resthaven Community Services. The evidence goes to her qualifications and employment history, training, work environment, colleagues, describes the work performed and the nature of the work, clients with dementia, the emotional demands of the job and the challenges of working alone.	13524	Statement	Yes	[13], [21], [24].	10 May 2022 <u>PN10475</u>	-

Paula Wheatley	The witness has worked in the sector for approx. 28 years and is currently employed as a Personal Carer, Paypoint 3 at Blue Care. The evidence goes to her current employment and her employer, on the job training, describes a typical working day, changes in the work, reporting and medication.	13533	Amended statement	Yes	[16], [33], [37], [42], [47], [72], [73].	10 May 2022 <u>PN10386</u>	-
Ross Heyen	At the time of making the statement, the witness was employed as a Client Services Assistant/Administration Assistant at Ozcare Noosa Residential Aged Care Facility however advised in the course of giving evidence that he is no longer employed in aged care and now works as an organiser for the UWU. The evidence goes to the changes to the work and the industry over time, specifically the reduction in staff and decline in empathy from management and speaks to how reduction in staff impacts on residents and on his ability to perform his role, how the lack of dedicated staff for certain roles leads to a cross-over in duties, the increased intensity of work in aged care and the high staff turnover rate.	13480	Statement	Yes	[7], [12].	11 May 2022 <u>PN11517</u>	-
Sandra Hufnagel	The witness has worked in the industry for 15 years and most recently until 3 March 2021 worked as a PCW in community care for PresCare Brisbane. The evidence goes to her education, training and qualifications, and her employment history (noting that she did not work in aged care between 1993 – 2010). The evidence also goes to changes in the work	13466	Statement	Yes	[15], [18], [21], [38], [44].	11 May 2022 <u>PN11586</u>	-

	and the industry, specifically the increase in the qualifications required including Certificate III in Aged Care, First Aid, CPR Certificates & Police Check and completion of training modules each year, the changes to her role and nature of her work over time and the significant staffing challenges in aged care.						
Susan Morton	The witness is employed as a Grade 3 Advanced Care Worker at Australian Unity and has been continuously employed in the role for approx. 33 years. The evidence goes to her employment history, current employer, training, working hours, medication, changes to the work such as the emergence of care 'packages', increased age of clients and reporting requirements, and the personal impacts of home care work.	13539	Statement	Yes	[4], [5], [11], [19], [21], [25], [33].	10 May 2022 <u>PN10768</u>	-
Susan Toner	The witness is a HCW with Anglicare. The evidence goes to her current employment, training, the nature of the work and describes personal care, cleaning and domestic duties, medication, social support and meals, dementia in clients, changes in family support circumstances, aged care packages, working alone, reporting and timetabling and changes over time.	13545	Statement	No	-	-	-
Teresa Hetherington	The witness is a Personal Care Assistant, Grade 2 at Australian Unity and has worked for nearly 20 years in the sector. The evidence goes to her employment history and current employment, training, a typical	13557	Statement	Yes	[11], [13], [20], [23],[36], [42], [76].	10 May 2022 PN10544	-

	working day, the work environment, medication, reporting, supervision, changes brought about by COVID-19 and the regulatory environment.						
Donna Cappelluti	At the time of making the statement, the witness was employed as a Food Services Assistant at Southern Cross Care however advised in the course of giving evidence that she no longer works for SCC as of 16 January 2022. The evidence goes to her employment history and career progression, training history, her duties and typical working day, changes to her duties over time, supervision and pay.	13568	Reply Statement	Yes	[12], [15], [16], [18], [21], [23], [28], [32], [33], [36].	11 May 2022 <u>PN12086</u>	-
Jane Wahl	The witness is employed as a part time Gardener at Gloucester Residential Care and has worked there for 16 years. The evidence goes to her employment history and career progression, training history, her duties and typical working day, supervision, changes over time, and pay.	13574	Reply Statement	Yes	[6], [7], [13], [24].	10 May 2022 PN11130	-
		Employ	er witnesses				
WITNESS	SYNOPSIS	DHB Page No.	Link to statement	Cross examined	Specific paragraphs of statement cross-examined on	Link to Transcript Reference	Additional documents taken to
Anna-Maria Wade	The witness is employed by ACSA as the National Manger of Employee Relations, State Manager (NSW/ACT), and Acting Executive Director of Membership & Services. The evidence goes to	15193	Amended Statement	Yes	ANMF: [22]-[25]	11 May 2022 PN12470	-

	ACSA and her various roles, the regulation of the industry particularly the <i>Aged Care Act 1997</i> , Awards, enterprise agreements and the ACQS, how the industry operates with regard to regulation, the types of providers and funding, and also discusses qualifications, training and medications.				Annexure AM-1 (see Schedule A) Annexure AM-2 HSU: [14], [18]		
Cheyne Woolsey	The witness is the Chief Human Resources Officer at KinCare. The evidence goes to his background, describes KinCare and its employees, training, how work is determined, home care work, support and supervision, reporting, funding, consumer directed care and the SCHADS Award.	15712	Statement	No	-	-	-
Craig Smith	The witness holds the position of Executive Leader Service Integrated Communities at Warrigal. The evidence describes Warrigal and his role, sets out the changes to the regulation of the industry and the impacts these had on Warrigal's operations with reference to the 1997 and 2014 Quality of Care Principles, "Living Longer, Living Better", the ACQS, NACMQIP and SIRS. The evidence also goes to the changes in the persons accessing aged care, the work environment, funding, qualifications, and training.	14120	Amended Statement	Yes	ANMF: [16], [18], [25], [26], [28], [29], [31], [32], [33], [41], [43], [45], [48], [49], [52], [56], [59], [60]- [66]. HSU: [34], [37], [60]- [64]	12 May 2022 <u>PN13147</u>	-
Emma Brown	The witness is a Special Care Project Manager at Warrigal. The evidence describes Warrigal and her	13980	Statement	Yes	ANMF:	12 May 2022	-

	position, the regulation of the industry including restrictive practices, ACQS, NACMQIP and SIRS. The evidence also goes to changes to the new facilities, rostering, the shift in the profile of consumers accessing aged care, palliative care, mechanical aids, assessment and care plans, qualifications and training, medication, engagement with family and integration of technology.				[5], [16], [27], [44], [51], [52], [78], [80]. Annexure EB- 10 Annexure EB- 11	PN13319	
Johannes Brockhaus	The witness is the CEO of Buckland Aged Care Services. The evidence goes to the witness' background, about Buckland and his role, regulation, the change in the type of residents accessing residential aged care and engagement. The evidence largely goes to the operations at Buckland and describes rostering, the respective roles and duties of the AIN, EN and RN in residential care, incident management, diversional therapists, kitchen, laundry, cleaners, maintenance, administrative employees, and home care.	14827	Statement	Yes	HSU: [25], [26], [27], [30], [31], [41], [43], [50], [52], [76],[77], Annexure JB-04 Annexure JB-05 ANMF: [52], [78]-[104]	12 May 2022 <u>PN13755</u>	-
Kim Bradshaw	The witness is the General Manager at Warrigal's Stirling Residential Aged Care Facility. The evidence goes to her role at Warrigal, describes the Stirling facility, industry expectations and the work of Warrigal employees. The evidence describes a general day, afternoon and night shift of an AIN and RN respectively, as well as the roles of kitchen staff, lifestyle staff, laundry staff and maintenance team.	14937	Statement	Yes	HSU: [22], [28], [39], [83], [86], [87], [96], [101]- [113], Annexure KB- 02	11 May 2022 <u>PN12953</u>	Warrigal And NSW Nurses And Midwives' Association, ANMF NSW Branch, and Health Services Union NSW/ACT Branch Enterprise Agreement 2017

					ANMF: [17], [22], [32], [44], [60]-[63], [72], Annexure KB- 02		(see DHB p.16008)
Mark Sewell	The witness is the CEO and Company Secretary of Warrigal. The evidence explains what Warrigal is, the witness' role in its operations and the governance of Warrigal. The evidence goes to the changes in the "wellderly", improvement in the physical environment of residential aged care facilities, funding and operational costs, changes in technology, training and qualifications, engagement with external persons and bodies, the composition of the workforce in both residential and home care, and medication.	14594	Statement	Yes	HSU: [7], [32], [34], [39], [40], [46]- [50], [52], [60], [66], [88], [89], [92], [93], [96], [107], [112], [118], [125], [126], [128], Annexure MS- 02 Annexure MS- 04 Annexure MS- 05 ANMF:	12 May 2022 PN12855	-

					[40], [58], [84]- [87], [93], [96]- [111], [123]		
Paul Sadler	The witness is the CEO of Aged and Community Services Australia (ACSA) and also runs an aged care consultancy business. The evidence provides a brief background on ACSA and the regulation of the industry, referring to the residential care and home care standards and SIRS.	13580	Statement	Yes	HSU: [23], [24], [27], [28], [30] – [35], [38], [41]-[44], [60], [63], [87], [88], [96].	11 May 2022 <u>PN12202</u>	Aged Care Quality and Safety Commission Guidance and Resources for Providers
	The evidence goes to how the industry is funded in terms of both residential care and home care, Commonwealth Home Support Programme (CHSP) and the significant impact of, and reliance on, government funding. The evidence also goes to the shift in the type of consumers accessing aged care services, the work environment, care services plans, medications, engagement with external parties and advancements in technology streamlining work practices.				Annexure PS-06 ANMF: [34], [54], [70], [86], [98].		Serious Incident Response Scheme – Guidelines for residential aged care providers Australian Aged Care Collaboration Media Release 1 March 2022
							(see DHB p.16456) Australian Aged Care Collaboration Media Release 22 March 2022
							(see DHB p.16462)

Sue Cudmore	The witness is the Chief Operations Officer of	15066	Statement	Yes	ANMF:	12 May	Alliance Health
	Recruitment Solutions Group Australia (Health				[9], [12], [13],	2022	Services Group
	Solutions) and have operational control for Alliance				[28], [32],		Pty Ltd Trading As
	Health Services Group Pty Ltd (Alliance). The					PN13513	Alliance
	evidence goes to her background, describes Health				Annexure SC-02		Home Care
	Solutions, Alliance and their employees, placement						Services
	of employees with 'host' employers, the nature of the				Annexure SC-05		Enterprise Agreeme
	work undertaken by Alliance employees and						nt 2009
	describes what employees are required to do prior to				HSU:		
	performing services, commencing work, performing				[10], [12], [16]		(see DHB p.16556)
	the service, and finishing the service.						
					Annexure SC-03		
					Annexure SC-04		