

The Senior Librarian negotiates resource provision with the Systems Branch regarding electronic requirements within the Reading Room and with other Senior Librarians regarding the rostering of adequate staff resources across all shifts within the Reading Room.

8. KEY RESPONSIBILITIES

1. Manage the operations of the Mitchell Reading Room as Officer in Charge by ensuring the provision of quality research and information services to both on-site and off-site clients.
2. Manage difficult client and/or emergency situations as the Officer in Charge.
3. Provide research and information services on complex client enquiries including meeting the needs of professional researchers and historians.
4. Review the quality of service, assess client needs and expectations and recommend changes to policies and procedures to ensure client service needs are met.
5. Ensure adequate staffing of the Reading Room across all shifts by developing a roster and negotiating for staff resources as required.
6. Provide leadership and direction to a team of five staff, setting priorities and facilitating communication across the group.
7. Manage staff training and development within the group, assess and provide feedback on staff performance and counsel staff as required.
8. Evaluate and review team functioning and implement changes in team processes where required.
9. Evaluate and assess user technology systems and user requirements and input into the design of electronic interfaces on the basis of this analysis.
10. Implement new user systems into the Reading Room ensuring the installation and maintenance of user technology and preparing training guides and conduct training sessions for all staff within the Reading Room.
11. Maintain awareness of technological issues and client's changing requirements and expectations to input into the longer term planning of the Library's technological needs.

9. KNOWLEDGE, SKILLS AND EXPERIENCE

The Senior Librarian requires a sound knowledge and understanding of the services and products offered by the State Library together with a knowledge of State Library services and policies, automated systems (mainframe and microcomputers), cataloguing standards. In addition, the Senior Librarian requires a knowledge and understanding of information technology issues and innovations for application within the Branch; and relevant legislation including EEO and OH&S.

Key skills for the position include reference and research skills, retrieval of electronic information, ability to handle rare and fragile original items, staff supervision, motivation, problem-solving techniques, negotiation skills so as to better manager staff and client relationships. The ability to adapt to as rapidly changing work environment and to learn and use new technologies, ability to analyse processes/tasks, to contribute to discussion about how things might be improved and to encourage this activity amongst other staff are also required.

The Senior Librarian requires a Degree or Graduate Diploma in Library Science/Information Management or equivalent and experience in user technologies, providing research and information services to a diverse range of clients and staff supervisory experience.

(Ex 133 Tab 3)

POSITION TITLE: LIBRARIAN

STATE LIBRARY OF NEW SOUTH WALES
DIVISION: AUSTRALIAN RESEARCH COLLECTIONS AND COLLECTION
MANAGEMENT
BRANCH: MATERIALS PROCESSING

1. PURPOSE OF POSITION

Provide a database creation and maintenance service by cataloguing materials from the State Library collections onto the National Bibliographic Database, database searching, staff training and undertaking special projects to ensure client access to materials both nationally and internationally.

2. REPORTING RELATIONSHIP

(i) Position Title(s) of Supervisor(s)

Team Leader Australian Monographs

(ii) Position Title(s) which also report to Supervisor(s)

Librarian (3)
 Senior Library Technician

(iii) Titles of Positions which report to this position

Not applicable

3. POSITION BACKGROUND

The State Library of NSW has a unique history with origins dating back to 1826 and a collection of some 4 million items. A premier information resource for the people of NSW and beyond, the Library is governed by a Library Council with an executive responsible for day-to-day operations. The State Library collection is a nationally significant resource.

The Materials Processing Branch has approximately 80 staff that are responsible for acquiring, cataloguing, indexing, end-processing, arranging microfilming and binding published library materials in a range of formats. Staff use computers and databases, follow documented procedures, and national and international standards. Cooperative arrangements are in place with the National and state libraries. Material is also collected under copyright legislation and other directives. Approximately 36,000 monographs and 140,000 serials issues are

processed annually. The budget is over \$3 million each year.

These processed collections form the basis of the core information and document supply services through the Library. Accordingly, our services and products are customer focused with appropriate performance indicators which are monitored regularly. The Library is the second biggest provider of bibliographic records outside of the National Library where the State Library has a national responsibility to contribute NSW records. The Librarian is a member of the Australian Monographs Team in the Materials Processing Branch which is a group of fourteen staff including the Team Leader, Senior Library Technician, Librarians, Library Technicians and Assistant Library Technicians. The team orders, accessions, catalogues and processes all books, videos, sound recordings, music scores, posters and electronic resources including CD-ROMS received by the Library that have been published in Australia. This service provides clients with access to information and gives reference staff physical access to items.

4. NATURE AND SCOPE OF WORK PERFORMED

The Librarian has three main functions: (1) catalogue materials for the National Bibliographic Database, (2) undertake database searching and staff training and (3) undertake special projects.

In the first main role, the Librarian catalogues materials from the collection held at the State Library. This involves researching the nature of the material, most importantly its subject area and analysing the different ways clients may attempt to search for the material to ensure public access both nationally and internationally. The position creates records using research and analysis requiring interpretation and application of national and international standards. In record creation, the position reconciles sometimes conflicting information, assesses placement of record across disciplines and ensures the record links into the wider database of over 13 million records. The position also ensures the physical security of rare and valuable materials when cataloguing.

In the second main role, the Librarian undertakes database searching and training of staff. This involves searching a range of databases with differing interfaces, syntax and operations. The position applies search strategies, refines searches, problem solving as required to ensure the efficiency and effectiveness of search strategies to meet client needs. The position also trains, facilitates and advises Library Technicians in cataloguing and search strategies, problem solving and assessing issues as required. The position also reviews and monitors the work standards of a number of Library Technicians to ensure the accuracy and accessibility of catalogue records.

In the third main role, the Librarian undertakes special projects. This involves the investigation and analysis of particular library cataloguing and searching issues including quality improvement projects. The position holder researches the issue, assesses information from both national and international sources and

develops recommendations in the form of a report to the Senior Librarian, Team Leader.

5. CHALLENGES/PROBLEM SOLVING

The principal challenge for the Librarian is in the research and analysis of material for cataloguing. The position draws on a wide general knowledge of material contained within the State Library in assessing the content of the materials and in analysing and anticipating the search strategies of clients. The position interprets international and national standards in the creation of records in an environment where standards and technology change continually. The position integrates records into a database containing over 13 million records and where records imputed into the database are accessed both nationally and internationally.

A further challenge for the Librarian is the review and quality control of the Library Technicians work in cataloguing and database searches. The position provides advice and training to Library Technicians, problem solving and assessing issues as required to ensure that cataloguing is performed within quality standards and to ensure user access to material within the collection.

6. DECISION MAKING

The principal focus of decision making for the Librarian is in the cataloguing of materials for the National Bibliographic Database. The position assesses the subject of the material through research and analysis and creates records in line with anticipated user search strategies. The position holder also advises Library Technicians in the more complex cataloguing issues and problem solves, providing training and facilitation.

The Librarian sets priorities within the range of work allocated, balancing cataloguing with undertaking database searches and special projects. The position makes recommendations to the Senior Librarian/Team Leader on special project outcomes and discusses longer term priorities with the Senior Librarian/Team Leader.

7. COMMUNICATION

The Librarian provides training, advice and facilitation to Library Technicians on cataloguing and database search issues and problems and makes recommendations to the Senior Librarian/Team Leader on special project outcomes and changes to processes and procedures. The position also provides advice and information to other staff across the Library on cataloguing and database search issues.

External to the Library, the Librarian liaises with the public and other libraries and institutions on searching and cataloguing issues and in researching information for cataloguing materials.

8. KEY RESPONSIBILITIES

1. Catalogue materials for the National Bibliographic Database to ensure user access to materials for acquisitions, copy cataloguing and information retrieval both within Australia and overseas.
2. Research the nature of the material including its subject and place within the collection and analyse the different ways users will attempt to access the material to ensure public access both nationally and internationally.
3. Create records on the basis of the research and analysis and interpret and apply international and national standards.
4. Reconcile sometimes conflicting information, assess placement of record across disciplines and ensure the record links into the wider database of over 13 million records.
5. Ensure the physical security of rare and valuable materials when cataloguing.
6. Search a range of databases with differing interfaces, syntax and operations by applying search strategies, refining searches, problem solving to meet client needs.
7. Train, facilitate and advise Library Technicians in cataloguing and search strategies, problem solving and assessing issues as required.
8. Review and monitor the work standards of a number of Library Technicians.
9. Investigate and analyse particular library cataloguing and searching issues, assess information from both national and international sources and make recommendations in the form of a report to the Senior Librarian, Team Leader.

9. KNOWLEDGE, SKILLS AND EXPERIENCE

The Librarian requires a knowledge and understanding of Library policies and procedures, knowledge of current and past national and international cataloguing standards, the Dewey Decimal Classification System and ABN Cataloguing standards and procedures and Library of Congress subject headings. The position also requires a general knowledge and understanding of the range of published knowledge and all areas of intellectual activity including knowledge of specific disciplines at a tertiary level.

The position requires cataloguing skills, analytical and research skills, well developed communication skills and organisational skills. The position also

requires training and facilitation skills in anticipating user search strategies.

The Librarian requires experience in cataloguing in automated environments and experience in database searching across a range of database interfaces and syntax. The position requires a degree in Information Management or its equivalent and must be eligible for professional membership of ALIA (Australian Library and Information Association).

(Ex 133 Tab 3)

POSITION TITLE: GEOLOGIST

NSW DEPARTMENT OF MINERAL RESOURCES
DIVISION: NSW GEOLOGICAL SURVEY
BRANCH/UNIT: REGIONAL GEOLOGY AND GEOPHYSICS
LOCATION: ST LEONARDS

1. PURPOSE OF POSITION

Provide accurate and current geological information on NSW, including maps, notes and databases to clients.

2. REPORTING RELATIONSHIP

(i) Position Title of Supervisor

Senior Geologist

(ii) Position Titles which also report to same supervisor

Geologist

Technical Assistant

(iii) Titles of Positions that report to this position

Technical Assistant reports to Geologist on field trips

Not applicable

3. POSITION BACKGROUND

The Regional Geology and Geophysics Section is responsible for geological mapping and the collection of field data. It undertakes research; field studies, sample analysis; compiles and edits geological maps and notes; prepares summary articles and maintains databases to provide advice on geology and mineral resource potential to government, industry and the community.

4. NATURE AND SCOPE OF WORK PERFORMED

The primary function of the Geologist is to collect, compile, synthesise and evaluate geological information. This includes library research, field mapping, developing and updating databases, co-ordinating sample analysis, microscope work, geophysical interpretation and preparing summary articles. The Geologist

compiles geological maps after undertaking field geological investigations using a range of techniques including structural geology, air photo interpretation, geophysical interpretations, and collection and analysis of samples to characterise mapped units.

A further function is preparing geological notes from field observations and describing different rock types, age of geological units, geochemical characteristics etc. Editing of maps and geological notes is then undertaken. The Geologist records information in a database, detailing locations using grid references, rock types, fossils, samples collected and other aspects of geological interest.

The Geologist also provides advice to clients including researchers, mining industry, local councils and students regarding geology and mineral prospectivity in NSW. The Geologist liaises with other government departments in land use planning to identify and maintain access to areas of current or future mineral exploration potential.

5. CHALLENGES/PROBLEM SOLVING

A major challenge for the Geologist arises from resolving conflicting geological interpretations due to the subjectivity of geology e.g. map boundary conflict; where one geologist may detail on a map a thick geological unit, yet where it adjoins another section of the map (completed by another geologist) it shows a narrow unit. This requires discussion and resolution by relevant team members.

Another challenge is retaining knowledge of all aspects of all areas in which the Geologist has worked to provide detailed information in response to enquiries. The Geologist therefore has to maintain logical filing systems and databases to allow access to data, and to be aware of the expertise of other departmental staff.

Challenges also occur due to competing priorities and deadlines where the Geologist is required to finalise certain aspects of mapping within a limited timeframe.

6. DECISION MAKING

The Geologist has day to day independence in setting priorities and work schedule relating to field trips, sampling, researching, maintaining databases, editing notes and maps and providing advice to prospectors and landholders.

The Geologist confers with the supervisor regarding issues such as the setting up of new databases, changing standard procedures, submitting samples for analysis (due to financial implications), coordinating field trips and attending conferences. Longer term priorities are set by the supervisor and Assistant Director in accordance with Departmental programs.

The Geologist co-ordinates the compilation of geological maps and data bases

from several team members and sometimes trains staff (e.g. in the use of the GPS [Global Positioning System] satellite navigation system.)

7. COMMUNICATION

The Geologist communicates with team members in the Regional Geology and Geophysics section to exchange information about their project, knowledge of particular areas and project planning.

Elsewhere in the Department the Geologist liaises and consults with Geologists at the Orange Regional Office to co-ordinate work, share information and arrange meetings; with Geophysicists regarding selection of optimum images and interpretation; Cartographers regarding receipt and provision of advice on map production and editing; S.S.A.R. staff (Special Services and Applied Research) regarding sample analysis and preparation; and ideas are discussed with research scientists.

External to the Department the Geologist communicates with landholders to explain the work of the section, negotiate access and answer questions; A.G.S.O. (Australian Geological Survey Organisation), Geologists (Federal Dept) regarding co-ordination of work, discussion of joint map areas, and information sharing; and researchers, prospectors and industry geologists to provide and seek advice on mineral exploration and geology issues.

8. KEY RESPONSIBILITIES

1. Collect, compile, synthesise and evaluate geological information on NSW, ensuring accurate and timely information is provided to clients.
2. Undertake field geological investigations to produce geological maps and notes for use by clients.
3. Develop and maintain databases of geological information for use in geographic information systems.
4. Provide occasional advice on mineral potential in land use planning issues.
5. Develop and maintain a sound knowledge of current geoscientific theories and techniques relevant to regional geological mapping.
6. Apply the principles of Equity and OH&S to ensure that staff and clients are treated fairly and have equal access to information and services.

9. KNOWLEDGE, SKILLS AND EXPERIENCE

The Geologist requires a degree in Science, majoring in Geology.

The Geologist requires a thorough knowledge and understanding of current geoscientific theory and practice. A familiarity with modern geological mapping techniques and the application of geophysical techniques to mapping is required.

Key skills for the position include the ability to research, collect, compile, synthesise and analyse geological data. The ability to develop and maintain computer databases and prepare concise reports is necessary. Also, the Geologist is required to use a range of office and field equipment.

The Geologist must be able to communicate effectively with a range of people including peers, clients, landholders, students, etc.

Previous field experience in geologically similar areas (e.g. Lachland Fold Belt) and familiarity with government procedures are an advantage.

An understanding of EEO and OH&S principles is necessary.

(Exhibit 134 Tab2.3)

POSITION TITLE: SENIOR GEOLOGIST

NSW DEPARTMENT OF MINERAL RESOURCES

DIVISION: GEOLOGICAL SURVEY

BRANCH/UNIT: MINERALS EXPLORATION ASSESSMENT

LOCATION: MINERALS AND ENERGY HOUSE

1. PURPOSE OF POSITION

Lead and manager the Mineral Exploration Assessment Section in the monitoring of all private sector non-coal mineral exploration activity in NSW to ensure compliance with statutory and title requirements and to maintain the standards of exploration in NSW.

2. REPORTING RELATIONSHIPS

i) Position title of supervisor

Principal Geologist

ii) Position titles that also report to supervisor

Principal Research Scientist
Senior Geologist

iii) Titles of positions that report to this position

Geologist
Clerical Officer

3. POSITION BACKGROUND

The NSW Department of Mineral Resources has five Key Performance Areas reflecting its corporate objectives, namely, Resource Assessment, Resource Allocation, Resource Management, Resource Policy & Promotion, and Corporate Management. This position is located in KPA1: Resource Assessment which assesses the State's mineral and energy resources and geology and distributes information to encourage exploration and development and provide a basis for informed land use and infrastructure planning.

The responsibilities of this position and its section incorporate all non-coal mineral exploration activity in NSW. Each year approximately 900 exploration reports and 650 title files are referred to this section for assessments and recommendations.

4. NATURE AND SCOPE OF WORK PERFORMED

The Senior Geologist leads and manages a section and is accountable for achieving program performance targets and for the supervision, training and development of staff to meet business objectives. The position sets work priorities and ensures consistency in assessments and recommendations.

The Senior Geologist assesses all non-coal mineral exploration directly and through the supervision of staff to ensure it is carried out at a satisfactory level and complies with statutory and title requirements. This includes providing advice, direction and recommendations with regard to the grant, renewal, termination and any other issues affecting mineral and mining titles.

The Senior Geologist informs Departmental executives on developments and trends within the mineral exploration industry in NSW.

The Senior Geologist, both directly and through supervision of staff, assesses all technical progress reports on company exploration activity (reports must be submitted by companies every six months) for compliance purposes and to ensure that geoscience information derived from exploration and mining is properly recorded and made available for dissemination. This includes following up company reporting omissions and breaches, and preparing mailouts for late reports.

The Senior Geologist provides input into the development and implementation of policies and procedures that relate to the exploration industry. The position develops and maintains appropriate databases and information management systems to ensure that records relating to exploration activity in NSW are managed professionally to meet Departmental needs.

Another role of the position is to write summaries of exploration activity and provide a listing of mineral projects for publication in MINFO magazine (Departmental publication).

5. CHALLENGES/PROBLEM SOLVING

Major challenges/problems currently faced by this position include;

- Negotiating and resolving issues with senior company personnel when their technical performance and reportage is below set requirements.
- Maintaining State-wide standards of exploration activity and technical reportage whilst exercising flexibility (to encourage exploration) and fairness.
- Operating within compliance management procedures particularly in areas where new issues arise and there is no clear precedent.

- Providing detailed professional assessments on large numbers of exploration reports and title files with minimal resources.

6. DECISION MAKING

The Senior Geologist has significant autonomy and makes day-to-day decisions that contribute to the effective and professional operation of the section. This position is accountable for planning and providing the full range of advice to the Department relating to all non-coal mineral exploration activity in NSW.

The position prepares recommendations on the grant, renewal (or refusal of renewal) and termination of exploration licences and mining lease applications.

The position also provides professional advice to companies to facilitate them meeting their objectives while maintaining Departmental standards.

Decisions and recommendations made by this position must have substance and be defensible as they are appealable and may be challenged in court where this position will represent the Department as a technical witness.

7. COMMUNICATION

Internally the Senior Geologist has significant contact and must liaise effectively with the Assistant Director, Principal Geologist and senior management across the Department providing proactive advice and recommendations on all matters relating to mineral exploration activity in NSW. An example would be advising the Assistant Director on title matters and exploration 'intelligence'.

The position has close contact with several other branches across the Department exchanging information on matters ranging from policies and procedures to surface disturbances and environmental issues.

Externally the Senior Geologist has regular contact with company personnel and is often called upon to negotiate with senior company staff to resolve compliance issues relating to titles. In solving these types of problems the position is required to identify possible solutions and then negotiate with company personnel to resolve these issues that may be impacting on the continuation of their titles. For example, where a company is holding a number of licences and their performance is below standard this position may need to persuade companies to reduce the number licences they hold to enable them to manage their holdings more effectively and therefore comply with Departmental requirements.

Although this position has no formal committee involvement it provides regular advice to the Exploration Titles Committee on the granting of exploration titles. Advice is also provided to a committee dedicated to Australian wide standardisation of exploration reporting requirements.

8. KEY RESPONSIBILITIES

1. Lead and manage the efficient and effective operation of the section including; supervision of staff, achieving goals as agreed with the Principal Geologist and overseeing the quality of operations to ensure the section functions successfully and performance targets are achieved.
2. Assess all non-coal mineral exploration activity within NSW to ensure it is carried out at a satisfactory level and complies with statutory requirements. (This includes providing advice and recommendations relating to the grant, renewal, termination and other issues affecting exploration and mining titles.)
3. Provide input and assistance in the development and implementation of policies, procedures and standards for all non-coal mineral exploration activity across NSW to provide the framework for a consistent approach in government management of exploration.
4. Provide the Principal Geologist and Assistant Director (Minerals) with regular reports, advice and recommendations to facilitate strategic decision making.
5. Provide industry with professional and informed advice that facilitates them meeting their objectives and complying with the conditions of their licences.
6. Maintain appropriate databases and information management systems to ensure that records and information relating to exploration activity in NSW are complete and readily accessible.
7. Keep abreast of industry developments in general concepts, models and methods employed in exploration, and in actual resource discoveries and developments.
8. Appraise the performance of staff and provide counselling and feedback to ensure organisation and personal development objectives are achieved.
9. Ensure all policies and practices comply with anti-discrimination and occupational health and safety legislation and promote the establishment of equal employment opportunity and the adherence to the ethnic affairs policy statement in accordance with agreed Government policy.

9. KNOWLEDGE SKILLS & EXPERIENCE

The Senior Geologist must have tertiary qualifications in geoscience supported by technical experience in geoscience and geoscientific exploration techniques and methods. This is to ensure the understanding of concepts and methods,

and to adequately assess the content of exploration reports and provide professional advice and recommendations. A sound knowledge is also required of the Mining acts of 1973 and 1992, and exploration licence conditions.

The Senior Geologist must also have experience in mineral exploration and the administration of titles.

Key skills for the position include sound negotiation and problem solving skills and excellent communication and interpersonal skills. This is to facilitate the resolution of sensitive issues in dealings with industry personnel, and to provide technical advice to management and industry.

Other skills include an ability to provide input in the development of policy, exercise fairness and flexibility while maintaining consistent standards, and computer skills to the level of managing databases and information management systems.

The Senior Geologist also requires experience in leading and managing a small section, including the supervision, training and development of staff.

(Exhibit 134 Tab 2.3)

APPENDIX NO. 14.

NSW NURSES' ASSOCIATION - PUBLIC HOSPITAL NURSES' (STATE) AWARD

**NEW SOUTH WALES NURSES' ASSOCIATION
PUBLIC HOSPITAL NURSES' (STATE) AWARD**

Operative Date	18.9.75	1.12.75	15.2.76	15.5.76	8.76	22.11.76	31.3.77	24.5.77	22.8.77	12.12.77	28.2.78	7.6.78	4.12.78	27.6.79
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**Enrolled Nurse
Over 18 Years**

1 st Year	103.00	111.00	118.10	121.60	124.10	126.80	132.50	135.00	137.70	139.80	141.90	143.70	149.40	154.20
2 nd Year	108.30	116.30	123.70	127.40	129.90	132.80	138.50	141.10	143.90	146.10	148.30	150.20	156.20	161.20
3 rd Year	112.60	120.60	128.30	132.10	134.60	137.60	143.30	146.00	148.90	151.10	153.40	155.40	161.50	166.80
Thereafter	119.00	127.33	135.10	138.90	141.40	144.50	150.20	153.10	156.20	158.50	160.90	163.00	169.50	174.90

Operative Date	4.1.80	14.7.80	25.8.80	9.1.81	7.5.81	22.8.81	27.5.82	1.11.82	6.10.83	6.4.84	6.4.85	4.11.85	26.6.86	1.7.86	10.3.87	17.12.87
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**Enrolled Nurse
Over 18 Years**

1 st Year	161.10	167.90	184.70	191.50	198.40	210.30	216.80	225.30	235.00	244.60	251.00	260.50	282.60	289.10	299.10	311.10
2 nd Year	168.50	175.60	193.20	200.30	207.60	220.10	226.70	235.80	245.90	256.00	262.70	272.70	295.00	301.80	311.80	324.30
3 rd Year	174.30	181.60	199.80	207.20	214.60	227.50	234.30	243.20	254.20	269.60	271.50	281.80	307.00	314.10	324.10	337.10
Thereafter	182.80	190.50	209.60	217.40	225.10	238.60	245.80	255.60	266.60	277.50	284.70	295.50	322.00	329.40	339.40	353.00

Operative Date 5.2.88 8.9.88 9.3.89 14.12.89 28.6.90 17.9.91 31.1.94 1.7.94 31.1.95 1.7.95 1.11.96 1.3.97 1.7.97

Enrolled Nurse
Over 18 Years

1 st Year	317.10	326.60	336.60	349.10	380.00	390.00	405.60	411.70	417.80	430.30	443.20	485.70	495.40
2 nd Year	333.30	340.20	350.20	362.70	394.00	404.00	420.20	426.50	432.80	445.80	459.20	496.30	506.20
3 rd Year	343.10	353.40	363.40	378.40	413.10	423.40	440.30	446.90	453.50	467.10	481.10	507.00	517.10
4 th Year	359.00	369.80	379.80	394.80	430.30	441.10	458.70	465.80	472.50	486.70	501.30	517.70	528.10
5 th Year					442.30	453.40	471.50	478.60	485.70	500.30	515.30	528.40	539.00

APPENDIX NO. 15.

RECOMMENDATIONS OF NSW PAY EQUITY TASKFORCE

The 11 recommendations of the NSW Pay Equity Taskforce were that:

Recommendation 1: That a Deputy President (Pay Equity) with specialist responsibility for pay equity be appointed in the IRC.

Recommendation 2: That an Inquiry into work value be undertaken in the IRC by Ministerial Reference;

Timeframe proposed: Following the appointment of the Deputy President (Pay Equity), the Taskforce recommends that the Inquiry be undertaken. This may occur during 1997.

Recommendation 3: That a pay equity State decision be conducted before the Full Bench of the IRC to establish Principles for pay equity in industrial instruments.

Timeframe proposed: Given that deliberations in the State case would, in part, be informed by the outcomes of the Ministerial Reference, the Taskforce recommends that the State case be conducted during 1998.

Recommendation 4: That the issue of pay equity be taken into account in the process of reviewing awards on a three yearly basis. Consideration should be given to utilising the minimum rates adjustment process as part of the award reviews.

Recommendation 5: That research and administrative support staff be allocated to the Deputy President (Pay Equity).

Recommendation 6: That information on pay equity and discrimination be developed and provided for Commission members.

Recommendation 7: That an information campaign in relation to pay equity issues be conducted.

Recommendation 8: That implications for pay equity in the enterprise bargaining process be monitored.

Recommendation 9: That protocols and procedures to govern the relationship between the ADB and the IRC be developed.

Recommendation 10: That the Women's Equity Bureau in conjunction with other stakeholders undertake further research into pay equity.

Recommendation 11: That the package of recommendations be monitored by the Women's Equity Bureau in conjunction with the industrial parties.

APPENDIX NO. 16.**ISSUES FOR CONSIDERATION IN THE SUBMISSIONS OF PARTIES TO THE PAY EQUITY INQUIRY****REFERENCE BY THE MINISTER FOR INDUSTRIAL RELATIONS
PURSUANT TO S146 (1) (d) OF THE INDUSTRIAL RELATIONS ACT
1996 (NSW) - MATTER NO. 6320 OF 1997****PREAMBLE**

- 1 On 18 May 1998 the Commission indicated that Counsel Assisting would produce a document which identified some issues that had arisen during the course of the Inquiry for the purposes of assisting the parties in preparing their final submissions.
2. The issues which are identified in this document are not intended to direct, confine or restrict the parties in dealing with any issue or matter which they consider appropriate for the purposes of their final addresses. Nor does the paper proceed upon an assumption of the existence of any "undervaluation" as referred to in Term 1 of the Terms of Reference.
3. Furthermore, the matters raised for consideration do not represent issues which the Commission would necessarily consider significant or determinative in the preparation of any report. Nor does the nomination of an issue indicate any particular approach that the Commission may take in this Inquiry. Rather the issues paper is intended to crystallise some issues which have been identified through the evidence or through the approach taken by parties in the presentation of their respective cases in the Inquiry.
4. However, it may be anticipated that if the parties address each of the issues raised the Commission will be advantaged by receiving the conforming or opposing views of parties as to the respective issues. The form and content of each submission will, of course, be a matter for each party.
5. In addressing the issues raised it would assist the Commission if the parties could refer to any evidence called during the Inquiry in support of their submissions and, in particular, the evidence going to the seven selected occupations and industries and comparator occupations and industries. In this context, the parties should consider particularly the issues raised in paragraphs 34 and 35 below. The parties may address if there is insufficient evidence in any area to sustain a consideration of a particular issue. It would also be useful if the key components of the substantial body of exhibited learned writings relied upon by parties could

be identified.

6. It should be noted that the issues are drawn so as to address matters which concern the scope of the Inquiry as well as the substantive issues raised by the Terms of Reference.
7. The term "pay equity" is not ascribed any particular meaning in this paper, but the paper does raise the need for consideration of the concept of "pay equity" given the use of that term in the title of the Inquiry.
8. Parties are reminded that Outline of Submissions are to be filed by noon on 12 June 1998.

ISSUES

General

9. In the ruling of the Commission of 20 April 1998 the Commission adopted a working definition of "remuneration", namely the meaning of that word as found in Article 1 of ILO Convention 100. Should the Commission make final that preliminary finding or adopt some other definition?
10. Term 1 of the Terms of Reference refers to female and male dominated occupations and industries. Some parties have suggested that the expression "dominated occupations and industries" should be interpreted as meaning a nominated percentage concentration of gender such as "65%". Is it appropriate to approach the definition of the expression by reference to a numerically based distinction? If so, what should be the percentage selected?

Statistical and Economic Analysis of Male and Female Earnings

11. Australian Bureau of Statistics data would seem to indicate that there is a gap (known as a pay or earnings gap in the economic evidence in the proceedings and in economic literature) between male and female weekly earnings. The estimate of the size of that gap depends upon a number of factors including which type of work is analysed and what is included in the earnings data. However, a question arises as to whether there is a pay gap between the earnings of men and women demonstrated in aggregate data and, if so, does this in any way demonstrate the existence of a 'pay equity', 'gender discrimination' or undervaluation of work in female dominated industries (either generally or in relation to the following issues raised under this heading).
12. An initial question that arises is what data should be relied upon in making assessments of a pay or earnings gap. Specifically, should the pay gap be estimated having regard to the following:-

- i. total earnings or ordinary time earnings;
 - ii. adult or non-adult employees; and
 - iii. managerial or non-managerial employees?
13. There is a further question as to whether the data should be adjusted for "hours paid for" as distinct from "hours actually worked" to truly estimate whether or not a pay gap exists.
14. A further and perhaps more significant question which arises in the context of economic analysis (in relation to aggregate assessments or measures) is whether statistical data (whatever its nature and content) in relation to a pay gap demonstrates any of the following:
 - i. pay equity;
 - ii. the extent to which females are treated unfairly in the labour market;
 - iii. the extent of pay discrimination against females in the labour market; or
 - iv. the extent to which there is unequal remuneration of comparable occupations.
15. Some economic evidence and literature presented to the Commission has attempted to analyse on an aggregate basis whether the pay or earnings gap or gender differential reflects some form of "gender discrimination" or "pay discrimination". These latter expressions are not often well defined either in the literature or the evidence presented to the Inquiry relating to economic analysis. The literature and evidence has also referred to notions such as 'gender bias' and 'unequal treatment in the labour market'. The precise matter which should be addressed in this context should be considered by the parties (having regard to the Terms of Reference).
16. Economic analysis has typically involved a decomposition analysis which is inter alia, designed to identify what component (if any) of the male/female earnings differential is attributable to occupational segregation or segmentation.
17. In fact two questions are raised:
 - i. does occupational segregation contribute to the earnings of male and female workers?

- ii. how much does the occupational segregation or concentration affect the pay gap?
18. It would seem, therefore, that the questions for economic analysis of aggregate data should be constructed as follows:
- i. across all occupations, what is the average effect of female intensity of an occupation on the hourly rate of pay of men and women?
 - ii. if men were allocated across occupations in the same way as women, and without changing the rate of pay in each occupation, how would the aggregate pay ratio between men and women change?
 - iii. what is the size of occupational segregation demonstrated?
19. The foregoing is based entirely on an analysis of general aggregate data based on linear relationships (for example, a move from zero percent female to 70 percent female concentration is assumed to have the same average effect). Would different conclusions be reached if the following was considered:
- i. non-linear relationships; and
 - ii. industry differences?
20. If the remuneration of workers is adversely affected by the concentration or distribution of women in an occupation or industry then does this fact *a priori* demonstrate that the differential is based upon gender *per se* (or alternatively the feminisation of a particular occupation or industry) ?
21. Alternatively, is the gender based occupational segregation explicable on some basis other than gender discrimination or bias? It has been suggested that the occupational segregation or notionally unexplained male/female earnings differentials may also be explained by:-
- i. the inadequacy or insufficiency of decompositional analysis (given current methodology and available data); or
 - ii. the effect of career breaks, age, bargaining power, self selection by women etc.

Do these considerations alter any *a priori* conclusion?

22. Is the occupational segmentation or segregation purely intra occupational or both intra and inter occupational?

23. If it is purely intra-occupational, will increasing the rates of pay of female workers address the differential? If it is both intra' and inter' occupational, then does an increase in remuneration address the differential wage in whole or in part?
24. Depending upon the outcome of the analysis of the causes of any differential, a further question is, if some element of aggregately determined gender based occupational segmentation remains (unaffected by other considerations) does this indicate that there has been an undervaluation of the work performed in female occupations or industries?
25. Does any earnings differential demonstrated by economic analysis constitute a pay inequity? In considering this issue some attention should be given to the meaning of the expression "pay inequity" (or equity). Consideration may be given to the *Industrial Relations Act* 1996 (NSW) (both in the dictionary and s.23) and other sources, but particularly relevant is the use of the expression "pay equity" in the Terms of Reference.
26. A further question which arises (although perhaps more in the area of remedial considerations) is whether scope remains for reducing the gender earnings differential (if found to exist) through any of the following:
- i. increasing the remuneration of women in female dominated occupations;
 - ii. removing or reducing segregation by means of providing employment opportunities for women in higher paying male occupations;
 - iii. remedies available under s.23 of the NSW Act; and/or
 - iv. any other approaches to remedial action.
27. Professor Gregory in his supplementary statement (exhibit 100) raises a further consideration - that is, in any particular occupation whether there is a gender effect arising from the disproportionate representation of women workers. Is this a valid consideration for economic or other analysis?

General Issues Concerning Value

28. What factors should be assessed in ascertaining the value of work? Should an assessment of the value of work be constituted by an assessment of the skills, responsibilities and other attributes of the work or performance of work, or the value of work to the employer? In this notion of valuation, is the appropriate test whether or not the comparator is of equal and/or comparable value and if so what should be the meaning assigned to those expressions?

29. Is it conceivable that the value of work can be considered in relation to overaward payments? Do overaward payments by their very nature imply that valuation of work has not been undertaken in fixing the rate? Can overaward payments be dissected to disclose elements that are related to skill, responsibility, experience, training etc, and those that reflect market forces?
30. Are market forces a relevant contributor to pay equity/inequity? If so, can industrial tribunals affect such market forces?
31. Are assessments of the value of work (whether by industrial parties or tribunals, or by the employee or the employer) affected by community or industrial attitudes to the value of particular work? If so, should industrial tribunals adjust for those attitudes, and should such adjustments reflect or deflect those attitudes? Should an objective assessment of the elements of the work, or value of work, in both the female and male dominated industry or occupation be undertaken, or should the assessment be subjective?
32. In terms of assessing equality of value or comparability of value, is equality of opportunity a consideration which should be taken into account? If so, can it be taken into account within these Terms of Reference?
33. Is the valuation of work a necessary element in achieving pay equity

General Issues Concerning the Selected Occupations and Industries

34. Noting the specific issues concerning valuation and equity raised under various headings below, do any or all of the selected occupations and industries demonstrate that there exists any undervaluation of work in female dominated occupations and industries'?
35. What conclusions specifically should be drawn in relation to each selected female dominated occupation and industry?

Valuation of Female Dominated Occupations and Industries Simplificiter

36. The Commission is charged under Term 1 to consider whether the work of female dominated occupations and industries is undervalued. Can this assessment of undervaluation be undertaken independently or separately of the examination of a male comparator or male comparators? In other words, do the Terms of Reference permit the examination of the valuation of female dominated industries and

occupations *per se* such that the Commission may examine whether the work in a female occupation has been inappropriately or inadequately valued simpliciter?

37. If so, then:

- i. occupation or industry?
- ii. in relation to examining the work in female dominated occupations and industries simpliciter, is it necessary in order to find undervaluation to establish some causal relationship (whether direct or indirect) between the undervaluation identified and the gender of the persons engaged in the industry?
- iii. should the test of undervaluation be the same as or similar to the test for identifying discrimination under anti-discrimination statutes?
- iv. has the work of persons engaged in the selected female dominated what is the proper basis or method for assessing the work in the female dominated occupations and industries been undervalued having regard to any of the following:
 - a) the history of the employment and female domination in the relevant areas;
 - b) the failure to recognise components or elements of the value of work *per se* including the inherent worth of the work;
 - c) the history of Award regulation;
 - d) the history of enterprise bargaining and agreement making;
 - e) overaward payments or market rate adjustments;
 - f) the existence of any inequity or anomaly;
 - g) work value considerations as contemplated in wage fixing principles;
 - h) the application of the minimum rates adjustment process; and
 - i) other factors?

38. Has there been a failure of tests and mechanisms to ascertain the value of work of the selected female dominated occupations and industries? Does any such failure derive from statute, wage fixing principles, industrial jurisprudence or agreement making procedures?

39. The corollary of the previous proposition is whether or not the existing tests and mechanisms to ascertain the value of work, including existing wage fixing principles, would be sufficient if properly applied (or perhaps applied at all) to address wholly or partly any undervaluation identified.
40. Is it possible that any valuation problems identified in the Inquiry for female dominated occupations and industries should have been addressed under existing wage fixing processes?
41. Is any undervaluation so identified capable of being remedied pursuant to anti-discrimination statutes?
42. If the examination of the undervaluation simpliciter is excluded, either by Terms of Reference properly construed or by extension the subject matter or title of the Inquiry itself (namely "Pay Equity"), then is it a matter which should nonetheless require full and adequate consideration as a part of the process of assessing whether there is any undervaluation of female dominated work? If so, should the assessment be based upon a consideration of whether there is any gender basis or causal connection based on gender in order to have the matter so assessed?

Comparison of selected female dominated occupations and industries and male comparators

43. Do each of the male dominated comparators selected for the purposes of the Inquiry appropriately fall within the expression "work in comparable male dominated occupations and industries" for the purposes of Term 1?
44. If not, what consideration (if any) should the Commission give to those areas in the context of valuing female dominated work?
45. If so, what is the appropriate methodology for ascertaining the relative value of work as between the selected female dominated occupations or industries and the male dominated comparator? Specifically are any one or more of the following adequate or appropriate tests for ascertaining the valuation of work:-
 - i. current work value tests;
 - ii. minimum rates adjustment processes;
 - iii. job evaluation techniques;
 - iv. competency based standards;
 - v. training and qualifications; and

- vi. comparable worth principles utilised in other jurisdictions.?
46. What is the relevance of the foregoing tests and mechanisms to any proposed methodology?
 47. Is it necessary or possible to draw comparisons with male or female dominated occupations and industries in order to identify the existence or otherwise of 'undervaluation'? Does the same answer follow if the question is addressed to 'pay equity'?
 48. Alternatively, if undervaluation is found for a female dominated occupation or industry (simpliciter) how does the existence of or otherwise of a male dominated comparator assist in the understanding or assessment of that undervaluation?
 49. Having regard to the foregoing considerations, is the work in each of the female dominated occupations and industries examined in this Inquiry undervalued in terms of the remuneration paid relative to work in the selected male dominated comparators?
 50. In considering undervaluation with reference to a male dominated comparator, what regard (if any) should be given to the areas identified at paragraph 37 (iv) above? How can these issues be dealt with in the context of a male dominated comparator being considered?
 51. To the extent that there is undervaluation in female dominated work, can the value of that work be assessed by a comparison between dissimilar male and female occupations or industries?
 52. On the available methodologies is there an appropriate, adequate or legitimate basis for comparing the value of work in dissimilar male and female occupations or industries?
 53. Assuming a suitable methodology is available, how could any adjustments to the remuneration of female dominated occupations and industries be made compatible with existing wage fixing systems or conform with economic, financial or other policies designed to regulate or restrict the level of wage movements in the economy?
 54. Does the use of comparators return to previously rejected systems of comparative wage justice?
 55. Does the use of comparators raise issues of flow-on or wage break-outs?

Broader Considerations of Remuneration, Undervaluation and Pay Equity

56. Having regard to the third question raised by Professor Gregory in paragraph 17, page 5 of exhibit 100 and/or to economic analysis of occupational segregation, does the evidence in the proceedings either

generally or by specific reference to the occupations and industries demonstrate that the remuneration in female dominated industries and occupations is less than male dominated industries and occupations as a consequence of the concentration, distribution, segmentation or segregation of women in those occupations and industries?

57. Can the issue of 'pay equity' or 'undervaluation' be addressed by examining it either globally or by reference to significant illustrative groupings of men and women workers? Is it appropriate to examine the female dominated occupations and industries selected for examination in the Inquiry as a class or group compared to male dominated comparators as a class or group from which conclusions may be drawn about the remuneration of such women or women workers generally when compared to such male workers or male workers generally?
58. If such an analysis is possible or conceivable, then what is the theoretical or methodological basis for it and is it possible to assess "undervaluation" in the context of such an analysis?
59. If so, are any of the following factors relevant:
60. Is undervaluation an intrinsic element of "pay equity"?
 - i. union participation and membership rates;
 - ii. relative bargaining strengths;
 - iii. nature of the engagements;
 - iv. non-trade background;
 - v. award or agreement processes and the transparency of same;
 - vi. community attitudes or understanding;
 - vii. turnover rates;
 - viii. on the job training arrangements;
 - ix. access to and recognition of vocational opportunities;
 - x. nature of the industry (service based, based product or other);
 - xi. nature and performance of the work; and

xii. other

61. Does the evidence of the selected female dominated occupations and industries as a whole, taken together with the evidence of the selected male dominated comparators indicate the existence of endemic or systemic discrimination?
62. How could any remedies which might be suggested by these broader considerations be made compatible with the existing system regulating wage movements?
63. What regard, if any, should the Commission have to comparison of award wages and wages paid as between the female dominated occupations and industries examined?

Effects on the Economy, Competitiveness, Employment and Profits

64. Irrespective of the conclusions reached as to undervaluation or unequal remuneration between men and women (whether based on discrimination or otherwise) should the Commission refrain from making any recommendation in relation to the same, having regard to the likely effect of any adjustments in remuneration on the NSW economy, and in particular, the need to protect the employment base of the State and any adverse employment effects on women?
65. Is the answer to the previous question conditioned by:-
 - i. the magnitude of any proposed remuneration adjustment;
 - ii. arrangements for phasing in remuneration adjustments;
 - iii. whether the issue should be approached on a case by cases basis;
 - iv. whether any adjustments would be proposed across the spectrum of female work, or limited to female dominated industries or occupations (or part thereof); and
 - v. whether any condition or criterion is imposed upon any remedy concerning "pay equity"?
66. Furthermore, by reference to interstate comparative rates or the competitive position of the State, is there further reason not to make any recommendations for addressing any undervaluation which is found?
67. A further consideration relevant to whether undervaluation (if it exists) might be addressed is the extent to which any adjustments in remuneration could rectify any differentials and whether the proper approach is changes

in policies designed to improve social justice for women without institutional wage adjustments.

Other Factors

68. There are some additional factors to consider in relation to valuation of work. These are as follows:
- i. Do special or different problems arise in the valuation of female dominated work when women are engaged in part time or casual employment?
 - ii. What is the relevance of International Labour Organisation and other conventions to the issues raised and do any international conventions of themselves dictate or demonstrate how a particular issue should be addressed? Should the Commission recommend the adoption of any ILO or United Nations Conventions or Recommendations?
 - iii. Do the current trends in enterprise bargaining or enterprise agreements (whether by statute or otherwise) raise special problems for consideration? Does the existence of higher levels of enterprise bargaining or agreement making have any direct or indirect impact upon:
 - a) the valuation of work in either female dominated occupations and industries and/or male dominated occupations and industries; or
 - b) pay equity issues generally?
 - iv. Can pay equity only be addressed in a centralised wage fixing system? What is the role of the parties to the industrial relations system in addressing pay equity? If those parties are identified as contributing to the undervaluation of women's work, how should the industrial tribunal deal with these parties?

Recommendations as to Remedial Measures

69. In relation to any remedies which may be proposed by the parties (if any remedies are, in fact, proposed) there are a number of issues which need to be addressed, as follows:
- i. Is it desirable for the Commission to report upon its findings as to valuation but otherwise to refrain from making any recommendations whatsoever?
 - ii. Does the evidence demonstrate that no recommendations should be

made by the Commission?

- iii. Is it desirable to remove or eliminate provisions (statutory or otherwise) relating to pay equity, equal pay, undervaluation or similar provisions?
- iv. What recommendations are proposed? Specifically, the following issues may arise in any remedies:
 - a) If some remedy is proposed what should be the trigger or gateway to such remedy?
 - b) Should remedies be addressed on a case by case basis or generally?
 - c) Should remedies be proposed in relation to the specific female dominated industries and occupations examined in the Inquiry? Should remedies be proposed more broadly?
 - d) Should remedies be collective in nature or provide individual rights?
 - e) Does any remedy proposed require any amendment to legislation?
 - f) Does any remedy proposed require the elimination in part or as a whole existing wage fixing principles?
 - g) Does any remedy proposed require an alteration to existing wage fixing principles? In this event it should be made clear whether the alteration proposed is the making of a new principle or principles or amendment to existing principles.
 - h) Is it proposed that there would be a State case under the NSW legislation to address any remedy?
 - i) Is it proposed that a test case should be held in the future concerning pay equity issues and in particular any recommendations made by the Commission?
 - j) Do existing sections 19 and 23 of the 1996 Act offer themselves as a vehicle for addressing any problems identified or should those provisions be eliminated or amended?
 - k) Is there any restructuring of the NSW Industrial Relations Commission required?
 - l) Are there any other special remedies which should be

considered?

- 70. Should the Commission make recommendations which relate to how male earnings are affected in female dominated occupations and industries or female earnings are affected in male dominated occupations and industries?

7 June 1998

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M J WALTON
Counsel Assisting

.....

P LOWSON
Counsel

APPENDIX NO. 17.

RULINGS OF INQUIRY

INDUSTRIAL RELATIONS COMMISSION OF NEW SOUTH WALES

CORAM: GLYNN J

17 DECEMBER 1997

MATTER NO. IRC6320 OF 1997

PAY EQUITY INQUIRY

Reference by the Minister for Industrial Relations pursuant to s 146(1)(d) of the Industrial Relations Act 1996

DIRECTION EX TEMPORE
(CORRECTED EX TRANSCRIPT)

HER HONOUR: The Employers' Federation of New South Wales and other employer associations, which for convenience I shall refer to as "the Federation" as encompassing all those listed of the letter of 15 December, has raised as an issue in this Inquiry in the letter dated 15 December 1997 and filed yesterday, 16 December 1997, whether or not counsel assisting should be appointed for the Inquiry.

However, in his submissions Mr *Kite* SC put an alternative submission that in the special circumstances of this case the process for appointing counsel assisting should be altered so as to have solicitors other than the Crown Solicitor instructing counsel assisting.

In making these applications the Federation is not supported by

any other party to the proceedings, including other employer associations. Indeed, it would appear that the primary application is not seriously pressed.

The applications, if they can properly be described as such, made by the Federation represented by Mr *Kite* SC are rejected. In my view, they are ill-conceived without proper foundation. Additionally, I wish to make it clear that upon the bases that the applications were originally pressed I consider them quite inappropriate.

No authority or proposition of law or principle was advanced by the Federation to support the applications, particularly that the appointment of counsel assisting may be extinguished by decision of the Commission.

For the most part, the issues raised by the Federation in their letter of 15 December do not squarely relate to the appointment of counsel assisting at all. In particular, the submission that these proceedings are some how adversarial in nature or the Government's role as a party to the proceedings is one-sided are not matters that are relevant to the question of the appointment of counsel assisting.

As I have indicated earlier in my decision regarding the suspension of counsel assisting, the Commission requested and received the appointment of counsel assisting. I confirm the reasons for that decision. I expressly approve the steps taken by counsel assisting the proceedings. His approach is consistent with a modern and efficient approach to the managing of such inquiries and has no doubt been conditioned by the considerable experience referred to earlier. The public interest will be better satisfied in proceedings such as this being conducted in a fair, efficient and cost-effective manner.

I also strongly support counsel assisting's use of a consultative approach to develop the draft directions. I am surprised indeed that any party would contend for any other approach or a different one. These are not adversarial proceedings.

The Commission is required by s 146(1)(d) of the *Industrial Relations Act 1996* to "inquire and report". By dint of both the statutory provisions and the Terms of Reference the proceedings are investigatory in nature. The Terms of Reference in paragraph 1 treat the use of industries and occupations as exemplars of the issues to be considered by the Commission in the Inquiry. The Terms do not require and the section does not permit findings by the Commission which are determinative of the interests of the parties affected. This is not a test case. Further, this is in accordance with the usual purpose of inquiries at large.

The particularly strongly felt opinion of any group or interest in the proceedings does not convert those proceedings from investigatory to adversarial at any stage in the proceedings and certainly not at the outset of them despite what Mr *Kite* might have said about being in an adversarial position or situation this morning.

Subject to providing adequate opportunities to the parties to put their respective positions and deal with matters raised in the Inquiry, the Commission will obtain such information in such manner as it considers appropriate to provide a report.

I refer to the recent statement of the President where he describes inquiries by ministerial reference,

"Secondly, this fact is no doubt reflected in the reference to me by the Minister for Industrial Relations of effectively these demarcation issues. This is a unique and novel step no doubt warranted in all the circumstances, given the history of demarcation disputes and the importance of the industries and occupations concerned. As to that Ministerial Reference, I accept the submissions put by Mr Walton in his opening submission that the Ministerial Reference is in the nature of a board of inquiry and therefore substantially less constraining of the Commission in the hearing of matters than would occur in ordinary adversarial proceeding [sic]. Provided the parties are afforded an ample opportunity to be heard, in proceedings of that type, the Commission is relatively at large to gather such information as may be necessary to assist it in making a report to the Minister."

Moreover, witnesses in the proceedings are not the witnesses of a particular party, but are persons called to assist the Commission in its Inquiry. Likewise, the Commission will not act in the Inquiry at the direction of any party, including those representing the interests of the Government, even if the Government was responsible for the drawing up of terms of reference and arranging for the appointment of counsel assisting.

If, as the Federation claims, the Government has an unambiguous position, though it may not use those words, (which is not made out) as to the "absence of pay equity", it can put that position before the Commission as a party to the proceedings, in which case it will be afforded no more and no less opportunity to do so than any other party.

Furthermore, the mere fact that the Government may have a position or positions in the Inquiry has no bearing on the role and the function of counsel assisting. This represents a fundamental misconception in the Federation's submission. The simple fact is that counsel assisting is not responsible to promote the interests of any party, including the Government.

As to the second proposition, which I note was expressed in the alternative but really did not contemplate the removal of counsel assisting, I find no basis to alter the process for the appointment of counsel assisting to this inquiry. Counsel assisting has acted and will continue to act in accordance with the needs of the Commission in the conduct of this Inquiry, having regard to his ethical obligations.

Before concluding this decision, it is incumbent upon me to repeat my comments upon the unsatisfactory nature of the procedure followed by the Federation in bringing this matter before the Commission. The application was notified to the Commission, 16 December 1997. It has not been notified to the other parties in any formal way. In addition to being on notice of this directions hearing since at least 1 December 1997 and of the requirement to file certain responses by midday, 15 December 1997, the Federation chose not to communicate its intentions until yesterday and further failed to comply with the filing requirements. This approach has had the effect not only of delaying today's proceedings but it has interfered adversely with the rights of other parties, as I shall specify later.

It is the need to prevent parties from adversely affecting the efficient conduct of the proceedings in the pursuit of their particular interests which indicates a further good reason for the appointment and retention of counsel assisting.

I would propose to follow and perhaps pick up where we would have been otherwise before the application made, which would go to taking provisional appearances, but it is now ten past one. I shall adjourn these proceedings until 2.15. The specific adverse interference with other persons' rights relates to a matter which was originally set down for 12 o'clock and has

been transferred to 2 o'clock. There is no way that that matter having been set down some weeks ago will be able to go forward today.

The Commission in this matter adjourns until 2.15.

INDUSTRIAL RELATIONS COMMISSION OF NEW SOUTH WALES

CORAM: GLYNN J

20 APRIL 1998

MATTER NO. IRC 6320 OF 1997

PAY EQUITY INQUIRY

Reference by the Minister for Industrial Relations pursuant to s.146(1)(d) of the Industrial Relations Act 1996.

RULING

Two matters of procedure as to the future progress of the Inquiry had been raised for determination. They relate to the time at which the final determination of the meanings of two words within Term 1 of the Terms of Reference, those being the words "comparable" and "remuneration" is to be made by the Commission.

Term 1 reads:

1. Whether work in female dominated occupations and industries is undervalued in terms of the remuneration paid relative to work in comparable male dominated occupations and industries. The Commission shall have regard to such female and male dominated industries and occupations as it considers sufficient to permit it to make recommendations but shall not be required to examine all such industries and occupations. In determining those industries and occupations the Commission should have regard to the need to impose reasonable restraints on time to complete the Inquiry.

I have been assisted in making this ruling by the submissions of

Counsel Assisting and of the parties. I do not refer specifically to them at this time as I anticipate that they may be modified or expanded in final submissions after all the evidence is before the Inquiry.

Having considered the submissions as to “comparable” it seems to me that while the parties may have different positions as to its meaning and as to the stage of the Inquiry at which it needs to be determined they all recognise that its final determination must await reception of all the evidence.

The Commission must not close off any avenues of research and enquiry that may assist it to consider the Terms of Reference and come to valid conclusions concerning them, even if some areas of enquiry eventually prove to be dead ends as envisaged in *Mahon v Air New Zealand* ([1984] 1 AC 808 at 815).

In my view it would be more productive to defer the ultimate determination as to the meaning of “comparable” until all the evidence and the submissions have been considered.

In relation to the term “remuneration”, two main approaches are advocated for in the submissions - one for the meaning of the term to be construed now (the Employers’ Federation contention) and the other for any final determination of its meaning to await the finish of the evidence.

It should be appreciated that in an Inquiry of this kind facts to illuminate the questions to be examined may prove to be elusive of discovery - complicated by the fact that it cannot be known at the start just what facts may be relevant either to questions or answers.

I do not think that the term "remuneration" should be construed at this time. A restriction such as that sought for instance by the Employers' Federation in relation to overaward payments, may have the effect of cutting off evidence that could prove valuable in the determination as to whether pay inequity based on gender exists in terms of Term 1 and, if the answer is positive, as to what recommendations, if any, should be made to ameliorate that inequity.

Rather than leave the issue completely open I propose to adopt, as a working definition, the definition of "remuneration" as found in Article 1 of the ILO Convention 100:

For the purpose of this Convention—

(a) the term remuneration includes the ordinary, basic or minimum wage or salary and any additional emoluments whatsoever payable directly or indirectly, whether in cash or in kind, by the employer to the worker and arising out of the worker's employment;

It is emphasised that the above definition is not found at this time to be the final definition of "remuneration" for the purposes of this Inquiry. That

final determination will be made in the light of the full evidence adduced to the Inquiry and the final submissions of the parties.

INDUSTRIAL RELATIONS COMMISSION OF NEW SOUTH WALES**CORAM: GLYNN J****24 APRIL 1998****MATTER NO. IRC6320 OF 1997****PAY EQUITY INQUIRY****Reference by the Minister for Industrial Relations pursuant to section 146(1)(d) of the Industrial Relations Act 1996****DECISION**

The inclusion of a further industry or occupational area was expressly reserved at the time that the six occupational areas currently before the Commission (in greater or lesser degrees of completion) were selected.

As indicated by Mr *Walton* on 22 April, his consideration of a further occupation emerged as a result of a request by me. After hearing a significant proportion of the evidence from most of the six areas originally selected by the Commission, I considered that the Inquiry would benefit from the examination of another female dominated occupation or industry, particularly one in which the employees were lower paid and without formal education, and which would permit the Commission to further examine some of the issues relevant generally to the process of valuation of work in female dominated occupations and industries.

The selection of the clothing industry, and the particular areas of work within that industry and for the purposes of a comparator, took place after Counsel Assisting undertook extensive research and consultation with a range of parties to the Inquiry.

In the result Counsel Assisting has proposed the inclusion of outworkers and another class of persons (not treated as employees) engaged in factories. In both cases the work performed is described in the Clothing Trades Awards.

Mr *Walton* also proposed comparators in the clothing trades and metal industries.

After hearing the parties in relation to this proposal I consider that the inclusion of outworkers will enhance the examination of the issue of “undervaluation” of female dominated work under the Terms of Reference. Moreover, it is a significant area for examination. Whilst there may be some practical difficulties in examining the area it is nonetheless a worthwhile field of inquiry.

Mr *Walton* has also raised the need for special procedural arrangements to be applied in the taking of evidence from the persons affected. He has further indicated that some issues relating to the source of income and taxation are not relevant for consideration. I agree with these submissions.

I make the Orders proposed by Counsel Assisting. They are attached.

PAY EQUITY INQUIRY - MATTER NUMBER 6320 OF 1997

SHORT MINUTES OF ORDERS

1. This Inquiry will examine work performed in the clothing industry, specifically as follows:
 - (i) work performed by persons in their own home (either in person or through a corporate or business entity), which work is described in the Clothing Trades (State) Award 1993 and./or the Clothing Trades Award 1982 (federal), such persons commonly being referred to as outworkers.
 - (ii) work performed by persons in a factory where the persons so engaged are neither treated nor paid as employees notwithstanding that the work is described in the relevant clothing industry awards.

2. For the purposes of comparators the Inquiry will examine the following areas of work:
 - (i) persons engaged under the terms of either the relevant Clothing Trades Awards described in Order 1 or the Textile Industry, &c. (State) Award or the Textile Industry Award 1994 (federal) who are engaged or treated as employees in accordance with the relevant award.
 - (ii) work performed by metals machinists under the Metal Industry Award at a classification level C12.

3. Counsel assisting may make such arrangements for the calling of the evidence of persons described in Order 1 which shall in his opinion prevent the name, address or other identifying feature of such person being disclosed to any person other than members of the staff of his office and the Commission. Such arrangements may include but are not limited to:
 - (i) making arrangements for the venue for the taking of evidence; and
 - (ii) making arrangements in relation to travelling to the venue for the taking of such evidence; and
 - (iii) making arrangements to restrict the number of party representatives attending such venues.

4. There will be no examination or cross examination of witnesses

performing the work in Orders 1 and 2 in or pertaining to the following areas:

- (i) sources of income from government including social security; and
 - (ii) income of or payments to persons in the witnesses household other than where such payment directly relates to the performance of outwork; and
 - (iii) the payment or avoidance of payment of taxation; and
 - (iv) the immigrant status of the witness or of members of their household.
5. The parties may examine a witness as to whether such person is in receipt of payment for the performance of work described in Order 1 from more than one source.

APPENDIX NO 18.**LIST OF EXHIBITS TENDERED TO THE INQUIRY**

NO.	TENDERED BY	DATE	NATURE OF DOCUMENT
Exhibits tendered during Threshold argument only			
A	Kite	17/12/97	Hansard 30/4/96 - Statement by Minister.
B	"	"	Crown's Submissions in Living Wage Case - AIRC dated 2/12/96.
C	"	"	Application by LC re State Decision purs. to s.51 No. IRC97/1942.
D	"	"	Transcript 30/6/97 in IRC97/1942 State Living Wage Case.
1	Walton	17/12/97	Terms of Reference
2	"	"	Bundle of documents being letters and schedules between Counsel Assisting and interested persons.
3	Walton	17/12/97	Two lever arch files numbered volumes 1 and 2.
4	"	27/1/98	Miscellaneous bundle of correspondence of EF, Teachers' Federation, Association of Local Government Librarians, Minter Ellison, ASU, P Goward Office of Prime Minister & Cabinet.

5	Walton	27/1/98	Three bundles of papers and accompanying correspondence.
6	"	"	Bundle of communications received by Counsel Assisting following issuing of correspondence in Ex.5.
7	"	"	Alphabetical list of nominations taken from Exs. 5 and 6.
8	Britt	"	List of current Federal awards/Variations/ Certified Agreements re Academic Staff.
9	Lowson	29/1/98	Letter from ASU to Office of Counsel Assisting dated 29/1/98 nominating 4 companies.
10	"	"	Letters from National Tertiary Education Union dated 28/1/98 and Office of Counsel Assisting dated 29/1/98.
11	"	"	Outline of Submission - T McDonald, Employers Federation.
12	Walton	30/1/98	Bundle of correspondence re nominations.
13	"	"	Summary of Nominations.
14	"	"	Nominations recommended for selection by Counsel Assisting.
15	"	26/2/98	Lever Arch file containing bundle of correspondence re Bayview/Draytons and broadcast faxes 20 and 24 February 1998.
16	"	"	Lever Arch file containing Statements of contentions filed by parties.

17	Walton	5/3/98	Amendment to Exhibit 14 (Selected industries and occupations second further amendment as at 5/3/98).
18	"	"	Letter dated 4/3/98 from Office of Counsel Assisting to all parties enclosing evidence.
19	"	"	Child Care Witness List - as at 5/3/98.
20	"	"	Broadcast facsimile dated 3/3/98 re timetabling arrangements from Office of Counsel Assisting to all parties.
21	"	"	New List of authorities and Reference List - Equal Pay.
22	"	"	Extract from Macquarie Dictionary p.1180 re "occupation".
23.	Walton	5/3/98	Extract from Stroud's Judicial Dictionary p.1732 re "occupation".
24	"	"	Extract from Macquarie Dictionary p.891 re "industry" or "industries".
25	"	"	Extract from Macquarie Dictionary p.1882 re "value".
26	"	"	Extract from Oxford Dictionary p.439 and Macquarie Dictionary p.1439 re "remuneration".
27	"	"	Extract (1876) 1 QBD 58, 663-4.
28	Benson	"	Submissions of Crown on "remuneration" and "comparable".

29	Lowson	6/3/98	Lever Arch file containing correspondence re Appearances.
MFI "A"	Poynder	6/3/98	Bundle of evidence to be filed by HREOC.
30	McDonald	"	Schedule headed "Value and Remuneration".
31	Walton	"	Draft Direction.
32	"	"	History of Industrial Jurisprudence and Legislation (contained in Green Lever Arch file with Ex.33).
33	"	"	Legislation - South Australia, Western Australia, Tasmania, New South Wales and United Kingdom Equal Pay Act of 1970 (contained in Green Lever Arch file with Ex.32).
34	Walton	9/3/98	Two (2) volumes - Lever Arch files - containing Award History re Child Care.
35	"	"	Folder containing Decisions, Statutory and Regulation material.
36	"	"	Statement of RONDELL MILLANE .
37	"	"	Extract from Folder 10 filed by Labor Council - Competency Standards.
38	"	"	Statement of BRIAN RUSSELL .
39	"	"	KU Children's Services Interview questions and format.
40	"	"	Statement of CHRISTINE WEDD .

41	Walton	9/3/98	Document relating to Lady Gowrie Child Care Centre and Annual Report 96/97.
42	"	"	Statement of JOAN PATRICIA HOLMES .
43	..."	"	Statement of EDGAR JOHN FORD .
44	Lowson	"	Statement of SANDRA BELL .
45	"	"	Information relating R.O.C.K.
46	Walton	"	Statement of SHARON HEGNER .
47	"	10/3/98	Amended Witness List.
48	Walton	10/3/98	Statement of IAN LAURENCE ALCHIN
49	"	"	Letters from Office of Counsel Assisting to PSA and Crown Solicitors Office dated 10/3/98.
50	"	"	Letters from Office of Counsel Assisting to LGSA and MEU dated 10/3/98.
51	"	"	Statement of GABRIELA MARTIRENA .
52	"	"	Information relating to Kanga's House Child Care Centre.
53	"	"	Statement of MEROPY KONITSAS .
54	Lowson	"	Statement of JUDITH CATHERINE KYNASTON .
55	"	"	Facsimile transmission from TAFE (handed to Counsel Assisting to be copied then distributed to parties and returned to Bench) (NOW PART OF EX.61).

56	Walton	11/3/98	Statement of ROSEMARY LOUISE KELLY.
57	"	"	Final Report - April 1997 "Pay Equity in Children's Services in NSW" (Rosemary Kelly).
58	Walton	11/3/98	Update to Report - February 1998 - "Pay Equity in Children's Services in NSW" (Rosemary Kelly).
59	Walton	11/3/98	Paper "Award restructuring and child care workers 1988-1992" (R Kelly) Centre for Labour Studies - University of Adelaide.
MFI "B"	Britt	"	Local Government & Shires Association - Award Supply Service Folder containing Local Government (State) Award 1997 (handed to Counsel Assisting for copying) (NOW PART OF EX.61)
60	Walton	"	Paper "Women, Exploitation and the Australian Child-Care Industry: Breaking the Vicious Circle" Laura Bennett.
61	"	"	Collection of documents with covering index - including metal industry award, local government award, Exhibit 55 being fax from TAFE, Code of Ethics, further statement by R. Millane, Expenditure statement from R.O.C.K. CONFIDENTIAL document and letter from Independent Education Union.
62	Walton	12/3/98	Statement of INGRID ZOEBE.
63	"	"	Letter to NSW TAFE Commission from Taskforce on the Australian Qualifications Framework.

64	Walton	12/3/98	Brochure "Australian Qualifications Framework - Making the Most of Achievements".
65	Lowson	"	Statement of WENDY ANNETTE LINDGREN.
66	Walton	12/3//98	Statement of PETER STAFFORD WRIGHT.
67	"	"	Folder re National Metal Industry Award Skills and Training.
68	Lowson	"	Statement of TONIA LESLEY ASHCROFT GODHARD.
69	Walton	"	Statement of JULIE CHRISTINE KILLIBY.
70	"	"	Fax from NSW TAFE (7 pages) J Killiby re History of NSW TAFE courses.
71	"	"	Summary Tables re Qualifications for Certificates and Diplomas.
72	"	"	Report re total enrolments in Associate Diploma course (13 pages).
73	"	"	White Folder containing: (a) Child Care National Competency Standards July 1997. (b) User Guide - July 1997. (c) Report to Child Care National Competency Standards July 1997.
74	"	"	Lever Arch File containing Award History - Metal and Engineering Industry (NSW) Interim Award.

75	Walton	12/3/98	Bundle of documents.- NSW Department of Community Services to Public Sector Management Office.
76	"	13/3/98	Statement of RODNEY DINNELL .
77	"	"	Two (2) page document - AWA Plessey company structure.
78	Walton	13/3/98	Bundle of three (3) brochures - Radar Antenna, Landing System and TACAN Antenna.
79	"	"	Plessey Corporation Ltd 1997 Annual Report.
80	"	"	Schedule Plessey Asia Pacific Pty Ltd (AWA Plessey) Certified Agreement 1997 (4 pages).
81	"	"	Document (1 page) headed Plessey Asia Pacific Pty Ltd (trading as AWA Plessey).
82	"	"	Plessey Asia Pacific Pty Ltd (AWA Plessey) Certified Agreement 1997 (C NO. 23964 of 1997) 4/11/97.
83	"	"	Plessey Asia Pacific Competency Standard Schedule (2 pages).
84	"	"	Three (3) Volumes being Metal Industry Competency Standards.
85	"	"	Competency Standards Implementation Guide March 1997.
86	"	"	Photograph of MSSR Antenna (photocopy is also part of Ex.89).
87	"	"	Statement of LONG LI .

88	Walton	13/3/98	Supplementary Statement of LONG LI.
89	"	"	Photocopies of photographs and graphs.
90	"	"	Photograph of Monopulse Secondary Surveillance Radar (photocopy is also part of Ex.89).
91	"	"	Photograph of 3 x 5 Premier Radar and Secondary Surveillance Radar (photocopy is also part of Ex.89).
92	"	"	Photograph of Testing TACAN Antenna (photocopy is also part of Ex.89).
93	"	"	Photograph of Field Service at India (photocopy is also part of Ex.89).
94	"	"	Resume of Long Li.
95	"	"	Memorandum from Interscan International Limited dated 24/7/91 (from D Blackburn) (2 pages).
96	"	"	Job Description - AWA Manufacturing re Long Li.
97	Walton	13/3/98	Revised Timetable for Submissions and Evidence.
98	"	19/3/98	Curriculum Vitae of Robert George Gregory.
99	"	"	Statement of ROBERT GEORGE GREGORY.
100	"	"	Rough Notes on the Statement of Mark Wooden.
101	"	"	Statement of Professor MARK WOODEN.

102	Walton	19/3/98	Blue Folder being Volume 4 of 10 filed by Labor Council.
103	"	"	Blue Folder being Volume 5 of 10 filed by Labor Council.
104	"	"	Reprint from "Economic Letters"- article entitled Occupational segregation and wages in Australia".
105	"	"	Statement of Dr IAN WATSON .
106	"	20/3/98	Programme re Inspections on 23 and 24 March 1998.
107	"	"	Diagrams/Graphs prepared by Professor Mark Wooden.
108	"	"	Diagrams/Graphs prepared by Professor Mark Wooden.
109	"	"	Comments on Statement of Gilliam Whitehouse by Mark Wooden.
110	"	"	Comments on Statement of Robert George Gregory by Mark Wooden.
111	"	"	Extract from "Future labor market issues for Australia - July 1996" Commission Paper No. 12.
112	"	"	Extract from Australian Social Trends 1997 - W McLennan Australian Statistician - Australian Bureau of Statistics, Catalogue No. 4102.0 "Changing industries, Changing jobs".
113	"	"	New South Wales Year Book No. 78 1998 Extract - Gregory W Bray, Regional Director, Australian Bureau of Statistics.

114	Walton	23/3/98	Letter from CEO, National Utilities ITAB to Mr Thomas, Curriculum Manager @ TAFE dated 6/3/98.
115	Lowson	"	Witness Statement of JUDITH APTE .
116	"	"	Supplementary Witness Statement of JULIE CHRISTINE KILLIBY .
117	"	"	Copy "Family friendly? You must be kidding" NCOSS Child Care Hotline 28/10/97.
118	Walton	24/3/98	Statement of GILLIAN WHITEHOUSE and Annexures.
119	"	..."	Amended Appendix "C" to Statement of Gillian Whitehouse.
120	"	"	Comments by Gillian Whitehouse on Statement of Mark Wooden.
121	"	"	Timetable re Librarians Order of Witnesses.
122	"	"	Bundle of documents relating to Inspections @ Redfern Day Nursery.
			CONFIDENTIAL (Restricted to Parties)
123	Walton	25/3/98	Blank form of Programme 3-5 yr. Room.
124	"	"	Lady Gowrie Child Care Centre "Developmental Profile" (formerly MFI "C" referred to during inspections).
125	"	"	Lady Gowrie Child Care Centre "End of Year Developmental Summary 1996" (formerly MFI "D" referred to during inspections).

126	Walton	25/3/98	Lady Gowrie Child Care Centre "Child Profile" (formerly MFI "E" referred to during inspections).
127	"	"	Lady Gowrie Child Care Centre "Piggibilla Indoor Program 1998 & Evaluations 1998 (formerly MFI "F" referred to during inspections.
128	"	"	Lady Gowrie Child Care Centre "Piggibilla Outdoor Program (3 pages) (formerly MFI "G" referred to during inspections.
129	"	"	Lady Gowrie Child Care Centre "Ratio Chart - Tumbalong, Piggibilla, Bugarri" (formerly MFI "H" referred to during inspections).
130	"	"	Lady Gowrie Child Care Centre "Sample of Individual Child's Report" (formerly MFI "J" referred to during inspections).
131	"	"	Implementation Handbook re Australian Qualifications Framework.
132	"	"	Pay Equity Case Study - Librarians & Geologists - February 1998 Report.
133	"	"	White Folder - Pay Equity Case Study - Librarians & Geologists - Supporting documents - Volume 1 - Librarians.
134	"	"	White Folder - Pay Equity Case Study - Librarians & Geologists - Supporting documents - Volume 2 - Geologists.
135	"	"	White Folder - Pay Equity Case Study - Librarians & Geologists - Volume 3 - Job Evaluation.

136	Walton	25/3/98	White Folder - Pay Equity Case Study - Librarians & Geologists - Supporting documents - Volume 4 - Hay Group Job Evaluation Manual.
CONFIDENTIAL (Restricted to Parties)			
137	Walton	25/3/98	White Folder - Pay Equity Case Study - Librarians & Geologists - Supporting documents - Volume 5 - OCR Job Evaluation Manual.
CONFIDENTIAL (Restricted to Parties)			
138	"	"	Statement of JANET GOOD (separate Lever Arch file).
139	"	"	Order and Award; Bauer J 18/12/85; 82/780 - Crown employees (Librarians) Award.
140	"	"	Order (NSW) IG Vol. 222 page 1797 (2/9/81) (2 pages).
141	"	"	Statement of KATE DUNDAS IRVINE .
142	"	"	Statement of KATHERINE BURNHAM .
143	Walton	26/3/98	State Library of NSW Employee Information (5 pages) and Annual Report 1997 Library Council of NSW.
144	"	"	NSW Department of Mineral Resources Information (56 pages) and Department of Mineral Resources Annual Report 1996/97.
145	"	"	Statement of DAGMAR BARBARA SCHMIDMAIER .
146	Benson	"	Booklet "Future Directions to 2001" State Library of New South Wales.

147	Lowson	26/3/98	Statement of Dr GEORGE STUDLEY GIBBONS.
148	Walton	"	Statement of GEOFFREY MICHAEL OAKES.
149	"	30/3/98	Statement of BRIAN JON HORNER.
150	"	"	Timetable for Submissions and Evidence.
151	"	"	Hairdressing & Beauty Therapists Witness Times as at 27/3/98.
152	"	"	Statement of SALLY COOKE.
153	"	31/3/98	Statement of MICHELLE BEATTIE.
154	"	"	H J Heinz Co. Aust. Pty Ltd. "Affirmative Action Programme for Women".
155	Walton	31//3/98	H J Heinz Co. Aust. Pty Ltd - Company Policy - Discrimination (12 pages).
156	"	"	Greenseas Eden Competencies Structure - Draft.
157	"	"	Current Classification Structure "Award .XLS".
158	"	1/4/98	DIRET&FE Report on Stage 1 Job Evaluation Tender No. 90/2 - January 1991.
159	"	"	Statement of DIANNE KAYE FRUIN.
160	"	"	Bundle of Determinations by Public Service Board.
161	"	"	Library Staff News - Public Library of NSW - September 1959.

162	Walton	1/4/98	Public Service List 1960 - New South Wales.
163	"	"	Article "A new phase for equal pay 'comparable worth' signals a new approach to a long campaign".
164	"	"	New South Wales Industrial Gazette Volume 225 page 1621 (Notification of Obsolete Awards).
165	"	"	Hairdressing & Beauty Therapists Witness Times as at 30/3/98.
166	"	2/4/98	Hairdressers (State) Award - Blue Folder containing award history being Gazettes, reported and unreported Decisions.
167	"	"	Female Hairdressing and Beauty Treatment (State) Award (153 IG 511).
168	"	"	Male Hairdressing (State) Award (154 IG 724).
169	"	"	Decision In re Female Hairdressing and Beauty Treatment (State) Award (1950 AR 203).
170	"	"	Decision In re Hairdressers &c., (State) Award (1975 AR 797).
171	Lowson	"	Statement of VERN WILLIAM ROBERTS .
172	"	"	Statement of SHIRLEY DUNGATE .
173	"	"	Statement of JOHN PARADEE - Note: paragraph 9.1 (only) is CONFIDENTIAL and restricted to parties only.

174	Walton	2/4/98	Statement of PAIGE LOUISE BARRAND.
175	"	"	Video - Channel 10 Clip "Hairdressing Health and Hygiene".
176	"	"	Video - "Hairdressing - Chemical Burns".
177	"	6/4/98	Statement of SARAH JANE KAINE.
178	"	"	Statement of PETER CORDONEY.
179	"	"	Statement of MARY DOYLE.
180	"	"	Statement of VINCENT TROPIANO.
181	"	"	Statement of ANDREW MARCZENKO.
182	"	"	Copy Brochure "Haute Coiffure Francaise Les Felines 98" (referred to in evidence of Mary Doyle).
183	Walton	7/4/98	Witness Statement of MEG SMITH.
184	"	"	Supplementary Witness Statement of MEG SMITH.
185	"	"	"Career Path of Persons with Trade Qualifications Australia 1993" Australian Bureau of Statistics document (Richard Madden).
186	"	"	Report entitled "Trade Credentials: do they help pay equity?".
187	"	8/4/98	Statement of KATHIE MARTIN.

188	Walton	8/4/98	Statement of GREGORY JOHN HATTON.
189	"	"	Book - Toyota Service Training "1998 Service Training Directory".
190	"	"	Statement of ENRICO PEROTTI.
191	"	20/4/98	Statement of WILFRED ARTHUR TAYLOR.
192	"	"	Issues Paper entitled "A woman's worth - pay equity and the under-valuation of women's skills in NSW".
193	"	"	Revised Timetable as at 17/4/98.
194	"	21/4/98	Statement of COLIN EDWARDS.
195	"	"	Employment Information - Maintrain, March 1998.
196	Lowson	"	Statement of MICHAEL EDWARD BRADY.
197	"	"	Statement of DIAN RAYNOR.
198	"	"	Statement of LAWRENCE PECH.
199	Walton	22/4/98	Extract from Factories, Shops & Industries Act - Part 6.
200	"	"	Statement of DEBORAH MAY.
201	"	"	Statement of MARY KAY.
202	"	"	Statement of MARYANNE PETERSEN.
203	"	"	Statement of ROSS NASH PARTON.

204	Walton	22/4/98	Statement of Contentions of the Employers Federation of NSW and the Chamber of Manufactures of NSW (Industrial).
205	"	"	Revised Timetable 22/4/98.
206	"	"	Bundle of 3 sets of documents:- 1. Decision of Manuel CC dated 14/3/69 in Matter No. 457 of 1968. 2. Transcript 1/7/88 in 653 of 1988, Transcript 29/7/88 in 653 of 1988, Transcript 24/8/88 in 653 of 1988 and Exhibits in proceedings before Macken J. 3. Transcript 15/8/90 in 90/144 and 90/261 and Exhibits including Memorandum of Understanding in proceedings before Mawbey CC.
207	Walton	23/4/98	Bundle of Contentions filed by parties commencing with that filed by Labor Council.
208	"	"	Bundle of documents filed Human Rights & Equal Opportunity Commission (HREOC) (Note: Separate lever arch file).
209	"	"	Statement of SUSAN WALPOLE.
210	"	"	Statement of RONALD CLIVE McCALLUM.
211	"	24/4/98	Judgment of Schmidt J dated 24/8/97, 96/1526.
212	"	"	Judgment of Marks J dated 19/12/98, 96/5227.
213	"	"	Decision of McBean Snr DP dated 11/7/97, Print No. P0547.

214	Walton	24/4/98	Decision of Blair C dated 26/8/97 Print No. P4284.
215	"	"	Short Minutes of Order.
216	"	"	Broadcast facsimile to all parties from Office of Counsel Assisting dated 23/4/98.
217	Lowson	"	Statement of CAROLINE ALCORSO.
218	"	"	Bundle of documents re Dr G Whitehouse.
219	"	"	Article entitled "Paying the Price" Anna Whelan - An Analysis of Staff Turnover in Long Day Care and Pre school Services Councils 1990.
220	"	"	Letter dated 31/3/98 from AWA Plessy to Office of Counsel Assisting - Supplementary Evidence together with enclosure.
221	"	"	Witness statement - ELIZABETH EVANS and attachments (3 booklets).
222	"	"	Final Report 10/3/97 "Relationship between Authorised Supervisor/Licensee - Centre Based & Mobile Child Care Services.
MFI "K	"	"	Commonwealth Child Care Programme Health & Family Services.
223	"	"	Lady Gowrie Child Centre - Policy for the Implementation of a Cross-Culture & Anti-Bias Curriculum.

224	Lowson	24/4/98	Box containing Booklet and video - Gowrie Resource News Issue, Lady Gowrie In service Training Book and Booklet entitled "More than one way to plan" and Newsletter - Issue #7, January 1998.
225	Walton	5/5/98	Broadcast facsimile from Counsel Assisting to all parties dated 30/4/98.
226	"	"	Timetable 5 - 8 May 1998.
227	"	"	Working Women's Centre Contentions.
228	"	"	Statement of ROSEMARY CLAIRE HUNTER.
229	"	"	Curriculum Vitae of Professor Rosemary Hunter.
230	"	"	Blue Folder being Volume 8 of 10 filed by Labor Council - particularly Tab 6.
231	"	"	Blue Folder being Volume 7 of 10 filed by Labor Council - particularly Tabs 14 & 15.
232	"	"	Article "Women Workers and Federal Industrial Law: from Harvester to Comparable Worth" - Rosemary Hunter.
233	Walton	6/5/98	Statement of LAURA ELEANOR BENNETT.
234	"	"	Article "Legal Intervention and the Female Workforce: The Australian Conciliation and Arbitration Court 1907 - 1921" - Laura Bennett.
235	"	"	Statement of ALICK MacFARLANE.

236	Walton	7/5/98	Statement of CHRISTOPHER PUPLOCK.
237	"	"	Statement of SARA CATHERINE MARY CHARLESWORTH.
238	"	"	Statement of ROSS McLELLAND dated 31/3/98 and annexures.
239	"	"	Statement of ROSS McLELLAND (2 pages).
240	"	"	Letter from Employers Federation to Office of Counsel Assisting dated 5/5/98.
241	Walton	8/5/98	Statement of RAYMOND BEEKMAN.
242	"	"	Statement of CLARE MARGARET BURTON.
243	"	"	Standards for Centre Based Long Day Care July 1993.
244	"	"	Australian Bureau of Statistics Catalogue No. 6254.0 - November 1996 - Career Experience Australia.
245	"	"	Asco Major & Minor Groups - Structural Lists - Asco First Edition Dictionary (2 pages).
246	"	"	Re Maintrain evidence - Delivery docket, Invoice, Delivery log and Inbound advice (4 pages).
247	"	"	Letter from Chamber of Manufactures of NSW (Industrial) to Office of Counsel Assisting dated 6/4/98 re Seafood processing evidence..
248	"	"	Librarians & Geoscientists Pay History (7 pages).

249	Walton	8/5/98	Letter from Department of Mineral Resources to Crown Solicitors Office 23/2/98.
250	"	"	Vehicle Industry - Repair Services & Retail Awards 1983 - Award History - Separate Blue Folder.
251	"	"	Letter from Motor Traders' Association of NSW to Office of Counsel Assisting dated 16/4/98 (3 pages).
252	"	"	Bundle of documents relating to the Hairdressing area.
253	"	"	Copy of Female Hairdressing & Beauty Treatment (State) Award (No. 2) 22/12/49.
254	"	"	Decision 11/11/94; Tabbaa CC; IRC94/2433 - Haidressers &c., (State) Award.
255	"	"	Motor Vehicle Repairs Act 1980 No. 71.
256	"	"	Hairdressing Regulation 1997.
257	Walton	18/5/98	Affidavit of NATASHA DEREVINA sworn 18/5/98.
258	Lowson	"	Affidavit of STEPHANIE SHEAN sworn 26/2/98.
259	"	"	Affidavit of AMANDA KERR sworn 26/2/98.
260	"	"	Revised Timetable.
261	"	"	New South Wales Department of Health Evidence for Comparator of First Year Enrolled Nurses employed at Royal North Shore Hospital together with Tabs A, B, C and D. (NOTE: Tab C returned to Office of Counsel Assisting for

inspection by parties).

262	Walton	19/5/98	Statement of DR SURI RATNAPALA dated 13/5/98.
263	"	"	List of Publications by Dr S Ratnapala.
264	"	"	Statement of NIALL EYRE dated 1/4/98.
265	"	"	Article by R G Gregory and R C Duncan "Segmented labor market theories and the Australian experience of equal pay for women".
266	Walton	20/5/98	Affidavit of JOHN FERGUSON MacALLISTER sworn 19/5/98.
267	"	"	Letter from Retail Trader's Association to Office of Counsel Assisting dated 13/5/98 and enclosure of 13 pages.
268	"	"	Witness Statement of MARGARET MARY YOUNG dated 14/5/98.
269	"	"	Witness Statement of LYNN TERRY FARRELL dated 1/5/98.
270	"	"	Document filed by the Employer's Federation authored by Professor Wooden.
271	"	"	Statement of Professor ROY GREEN dated 24/4/98.

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272	Walton	20/5/98	
273	"	"	Article by R Dickens, S Machin and A Manning "Minimum Wages and Employment" from International Journal of Manpower.

274	Walton	25/5/98	Broadcast facsimile from Office of Counsel Assisting to parties dated 22/5/98 re outworker evidence of 29/5/98.
275	"	"	Areas of Examination for Outworkers (4 pages).
276	"	"	Revised Timetable.
277	"	"	Statement of RICHARD PHILLIP COX dated 5/5/98.
278	"	"	Affidavit of HELEN SPENCER sworn 12/5/98.
279	Lowson	"	Statement of RODNEY STINSON dated 27/2/98.
280	"	"	Supplementary Statement of RODNEY STINSON dated 11/5/98.
281	Walton	"	Revised Timetable.
282	"	"	Facsimile from Australian Business Limited dated 23/5/98 (2 pages).
283	"	"	Amended Areas of Examination re Outworkers.
<u>CONFIDENTIAL</u>			
284	Walton	26/5/98	
<u>CONFIDENTIAL</u>			
285	Walton	"	
<u>CONFIDENTIAL</u>			
286	Walton	26/5/98	
287	Walton	28/5/98	Final Programme - published 27/5/98.
<u>CONFIDENTIAL</u>			
288	"	"	

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289	Walton	28/5/98	
290	"	"	Affidavit of NATASHA DEREVNINA sworn 12/5/98.
291	"	"	Orders re Outworkers Evidence.
292	"	"	Affidavit of BARRY TUBNER sworn 14/5/98.
293	Benson	"	Outworker's Diary produced by TCFUA.
294	"	"	Letter from Hon. J W Shaw, QC MLC to B Tubner, TCFUA (undated).

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295	Walton	29/5/98	
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296	Walton	"	
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STRICTLY CONFIDENTIAL

297	Walton	29/5/98	
298	Lowson	1/6/98	Facsimile transmission from Office of Counsel Assisting to Employers Federation dated 31/5/98 re Statement of C Richardson (3 pages).
299	Lowson	1/6/98	Facsimile transmission from Office of Counsel Assisting to Crown Solicitor's Office dated 31/5/98 (2 pages) and Broadcast facsimile dated 31/5/98 (4 pages).
300	"	"	Statement of LINDEN SWAN dated 1/6/98.
301	"	"	Witness Statement of ALISTAIR WILLIAM MACDONALD dated 1/6/98.

302	Lowson	1/6/98	Affidavit of ANTHONY RICHARD WOOLGAR sworn 29/5/98.
303	"	"	Letter from Professor Michael Quinlan to Office of Counsel Assisting dated 7/5/98 enclosing Report of Dr Claire Mayhew entitled "The Effects of Outsourcing upon Occupational Health & Safety etc." - January 1998.
304	Walton	"	Final Programme published 31/5/98.
<u>CONFIDENTIAL</u>			
305	Walton	2/6/98	Affidavit of Service re Satinder Singh.
<u>CONFIDENTIAL</u>			
306	Walton	2/6/98	Record of Interview of SATINDER SINGH.
<u>CONFIDENTIAL</u>			
307	"	"	Affidavit of Service re Mai Tuyet Thi Doan.
<u>CONFIDENTIAL</u>			
308	"	"	Affidavit of Service re Thi Lan Ahn Nguyen.
<u>CONFIDENTIAL</u>			
309	"	"	Record of Interview of THI LAN AHN NGUYEN.
<u>CONFIDENTIAL</u>			
310	Benson	2/6/98	Four (4) letters re Medirite Australia P/L and RTA - tenders/quotes.
<u>CONFIDENTIAL</u>			
311	Walton	"	Record of Interview of MAI TUYET THI DOAN.
312	"	"	Two Folders - Volume 1 - 1918-949 and Volume 2 - 1954-1994 - Clothing Industry Award History.

313	Walton	2/6/98	White Folder containing Clothing Trades Awards and Legislation.
314	"	"	White Folder containing Senate Economics References Committee Report "Outworkers in The Garment Industry" December 1996.
315	"	"	White Folder containing Clothing Industry Codes of Conduct and Agreements.
316	"	"	Folder containing Clothing Outworkers Kits.
317	"	"	Affidavit of GARRY DOUGLAS LAVER sworn 14/5/98.
318	"	"	Affidavit of ANTHONY JOHN TOOHEY sworn 14/5/98.
319	"	"	Affidavit of PAUL CLIVE LISTER sworn 14/5/98.
320	"	"	Affidavit of TIMOTHY LEMPRIERE TODHUNTER sworn 13/5/98.
321	"	"	Affidavit of DEBRA JANET CARSTENS sworn 13/5/98.
322	"	"	Affidavit of DAVID EDWARD BUTLER sworn 28/5/98.
323	"	"	Affidavit of ROBERT BRUCE HERSHAN sworn 26/5/98.
324	"	"	Letter from Office of Counsel Assisting to Department of Industrial Relations dated 28/4/98 and letter from W. McDonald, Department of Industrial Relations to Office of Counsel Assisting dated 13/5/98.

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325	Walton	3/6/98	
326	Lowson	"	Curriculum Vitae of Rodney Stinson.
327	Walton	9/6/98	Broadcast facsimile from Office of Counsel Assisting dated 7/6/98 enclosing Issues Paper.
328	"	"	Broadcast facsimile from Office of Counsel Assisting dated 5/6/98 to all parties (2 pages) re Final Programme etc.
329	"	"	Statement of Professor HELEN HUGHES dated May 1998.
330	"	"	Memorandum from Office of Counsel Assisting re Inspection at Bonds, Unanderra on 10/6/98.
331	"	"	Statement of RAYMOND BENNETT dated 1/5/98.
332	Walton	10/6/98	Statement of SLAVICA RATAJKOSKA .
333	"	"	Statement of KATRINA MIHALOPOULOS .
334	"	"	Statement of JON NOLAN dated 4/6/98.
335	"	"	Statement of BARBARA JOAN JENSON sworn 13/5/98.
336	"	"	Statement of MEG SMITH entitled "An overview of the classifications and rates of pay for clothing industry machinists and metal industry machinists.
337	Walton	10/6/98	Memorandum from Ron Cowlshaw of Bonds to Staff dated 9/6/98.

338	Walton	11/6/98	Statement of CHRISTOPHER JOHN RICHARDSON dated 27/5/98.
CONFIDENTIAL			
339	Walton	11/6/98	Supplementary Statement of Christopher John Richardson "Access Economics Macro Model".
340	"	"	Broadcast Facsimile from Office of Counsel Assisting to all parties dated 10/6/98 (1 page).
341	"	"	Copies of Invoices/Statements to K Falting from S Pollari.
342	"	"	Record of Interview re SINNIKA POLLARI dated 1/6/98.
343	"	"	Applicant's Statement of Contentions of Facts and Law in matter No. IRC97/6181 Pollari v Falting.
344	"	"	Respondent's Contentions of Fact and Law in matter No. IRC97/6181 Pollari v Falting.
345	Walton	12/6/98	Statement of IAN BATTY dated 17/5/98 and 4 videos.
346	"	"	Affidavit of BARRIE NEIL THOMAS sworn 1/6/98.
347	"	"	Affidavit of the HONOURABLE J M RIORDAN sworn 11/6/98.
348	"	"	Affidavit of SHAREN NANCE TURNER sworn June 1998.
349	"	"	Separate folder being Volume 1 of 10 filed by Labor Council.
350	Walton	12/6/98	Separate folder being Volume 2 of 10 filed by Labor Council.

351	Walton	12/6/98	Separate folder being Volume 3 of 10 filed by Labor Council.
352	"	"	Separate folder being Volume 6 of 10 filed by Labor Council.
353	"	"	Separate folder being Volume 9 of 10 filed by Labor Council.
354	"	"	Separate folder being Volume 1 of material filed by Employer's Federation.
355	"	"	Separate folder being Volume 2 of material filed by Employer's Federation.
356	"	"	Separate folder being Volume 3 of material filed by Employer's Federation.
357	"	"	Separate folder being Volume 4 of material filed by Employer's Federation.
358	"	"	Documentary Evidence filed by Employer's Federation re A Plummer - "Equal Value Judgments: Objective Assessment or Lottery?".
359	"	"	Letter to Employer's Federation and enclosures re International Labour Organisation (ILO) Obligations: Equal Pay dated 1/5/98.
360	"	"	Separate white folder containing General Literature & Literature concerning Outworkers - Volume 1.
361	"	"	Separate folder - Collection of Economic Literature - Volume 2.
362	"	"	Separate folder containing Case Law & International Material - Volume 3.

363	Walton	12/6/98	Budget Paper No. 1 - Budget Strategy & Outlook 1998-99.
364	"	"	1998-99 Budget Paper No. 3 - Federal Financial Relations 1998-99.
365	"	"	Australian Bureau of Statistics "Australian Economic Indicators" - February 1998 - 1350.0.
366	"	"	Australian Bureau of Statistics "Part-Time, Casual & Temporary Employment NSW" October 1997 - 6247.1.
367	"	"	Australian Bureau of Statistics "Trade Union Members Australia" August 1996 - ABS Catalogue No. 6325.0.
368	"	"	Australian Bureau of Statistics "May 1998 Australian Economic Indicators" 1350.0.
369	"	"	Australian Bureau of Statistics "1995 - 2011 Labour Force Projections Australian" Catalogue No. 6260.
370	"	"	Comparison of Librarians & Geologists in other public sector jurisdictions (33 pages).
371	"	"	Separate folder containing Collection of Awards re Hairdressing & Beauty Sectors outside NSW.
372	"	"	New South Wales Industrial Gazette Vol. 299 Part 1 pages 1-621 20/6/97.
373	"	"	Public Employment Office Circular No. 96-36 re Crown Employees (Public Sector-Salaries August 1995) Award.

374	Walton	12/6/98	Circular No. 97-74 Premier's Department NSW re Crown Employees (Public Sector-Salaries June 1997) Award.
375	"	"	Judgment 4/3/83 - 780 of 1982 and 81 of 1983 - CICS - Crown Employees Librarians Award & Anor.
376	"	"	Extract from Department of Technical Education Handbook 1973.
377	"	"	Crown Employees (Librarians & Library Officers etc. Award (193 IG 759).
378	"	"	Appendix A - National Automotive Industry Competency Standards - Repair Services & Retail.
379	"	"	Letter from Minister for Energy and for Local Government & Co-operatives to L Swan, Professional Hairdressers Association dated 1/7/94 (Bundle 32 pages).
380	"	"	Facsimile from NSW Working Women's Centre to Office of Counsel Assisting dated 3/6/98 and enclosures (6 pages).
381	"	"	K Mart Research Survey (39 pages).
382	"	"	Facsimile from S Dungle (NSW TAFE) to Office of Counsel Assisting dated 12/6/98 and enclosures (6 pages).
383	"	"	Facsimile to All Parties from Office of Counsel Assisting dated 12/6/98 re Steggles.

384	Walton	12/6/98	Folder containing Clerical & Administrative Employees (State) Award and variations and Clerks (State) Award and variations.
385	"	"	List of Agreements held in Industrial Office as at April 1998 supplied by Federated Clerks' Union.
386	"	"	Letter from Office of Counsel Assisting dated 21/5/98 to Adecco Employment Agency (Centacom) and reply dated 2/6/98 and enclosures.
387	"	"	Letter from Crown Solicitors Office dated 13/5/98 to Office of Counsel Assisting re Heinz Greenseas.
388	"	"	Letter from Office of Counsel Assisting to Department of Industrial Relations dated 28/4/98 and (7 pages) List of EA's re Child Care long day care centres.
389	"	"	Transcript 2/6/70 re Kindergartens &c. (State) Conciliation Committee No. 239 of 1970.
390	"	"	Extract 10/4/96 Senate Committee Inquiry (26 pages).
391	"	"	Letter Chamber of Manufactures to Office of Counsel Assisting dated 28/5/98 and enclosures re rates of pay for Clothing Trades (State) Award 1987 to 1993.
392	"	"	Bundle of documents - Legislation pertaining to Clothing Industry Outworkers.
393	"	"	Documents produced by Federal Department of Industrial Relations re clothing Industry.

394	Walton	12/6/98	File Notes, letters etc. re Office of Counsel Assisting's attempts to contact Kerrie-Lee Falting.
395	"	"	Separate folder containing Labor Council documents filed 1/5/98 - additional case materials for Folder 3.
396	"	"	Separate white folder containing various exchanges between Office of Counsel Assisting and other bodies.
397	"	"	Letter from Office of Counsel Assisting to Australian Business Ltd (dated 28/4/98 and 6 other parties re evidence of Professor Mark Wooden.
398	"	"	Letter from Employer's Federation to M Walton, Counsel Assisting dated 13/5/98.
399	"	"	Letter from Office of Counsel Assisting dated 29/5/98 to G Laver, Target Australia Pty Ltd.
400	"	"	Letter from NSW/ACT Independent Education Union to Office of Counsel Assisting dated 2/6/98 (5 pages).
401	"	"	Letter from Office of Counsel Assisting to Retail Trader's Association dated 8//98 (4 pages).
402	"	"	Letter from Crown Solicitors Office to Office of Counsel Assisting dated 9/6/98 re transcript errors.
403	"	"	Facsimile to Crown Solicitors Office from Office of Counsel Assisting dated 12/6/98 and enclosures (5 pages).

404	Walton	12/6/98	Decision - AFMEPKIU and HPM Industries 4/3/98 AIRC Print... P9210.
405	"	"	NSW Workers Compensation Statistical Bulletin 95/96 produced by WorkCover NSW.
406	"	"	Affidavit of Service sworn 4/6/98 re Kerrie-Lee Falting.
407	Walton	16/6/98	Index to material to be filed by Employer's Federation (such material being Ex.408).
408	"	"	Separate file box containing articles referred to in Index being Ex.407 filed by Employer's Federation.
409	"	"	Extract from "Six Wage Concepts" - J Hutson - Concept No. 5 - Work Value.
410	"	"	Extract from "Six Wage Concepts" - J Hutson - Concept No. 4 - Equal Pay.
411	"	"	Facsimile from Office of NOW MFI "L" Counsel Assisting dated 15/6/98 to All Parties enclosing Statement of Gulseren Izmer (dated 9/6/98) and Letter from Employer's Federation to Office of Counsel Assisting dated 15/6/98.
412	"	"	Extract from National Committee on Violence Against Women - National Strategy on Violence Against Women October 1992.
413	"	"	Letter from Crown Solicitor's Office to Office of Counsel Assisting dated 12/6/98 re Job Evaluation - Department of Mineral Resources & Librarian.

414	Walton	16/6/98	Facsimile from Queensland Health Industrial Unit enclosing copies of Pay Rates for Enrolled Nurses in Queensland, South Australia, Victoria and Tasmania.
415	"	"	Facsimile from ALHMWU dated 13/6/98 to L McKay enclosing rates re Child Care Awards in other States (8 pages).
416	"	"	Separate Folder containing Supplementary material filed by Labor Council.
417	"	"	"Holding the Keys: Women in Real Estate" (Report referred to in C Alcorso's evidence).
418	"	"	Urban Research Program - Working Paper No. 27 - September 1991 "Sub-Contracting: The Seamy Side of the Clothing Industry?" by Alastair Whyte Greig.
419	"	"	Decision, Keely J, 7/9/90, Clothing & Allied Trades Union of Australia v Snugglerite Industries P/L.
CONFIDENTIAL			
420	"	"	Facsimile from Bonds dated 12/6/98 to A Britt and P Lowson.
421	"	"	Extract from Book by Card & Krueger.
422	"	"	Facsimile from Office of Counsel Assisting to R News, Adecco dated 15/6/98.
423	"	"	NSW Board of Vocational Education & Training - 1997 NSW State Training Profile.
424	"	"	NSW Government's Pay Equity Report 1998.

MFI "Mines Not yet tendered"			Statement by C W Richardson under cover of letter from Employers' Federation dated 16/6/98.
425	Lowson	19/6/98	Broadcast facsimile from Office of Counsel Assisting to All Parties dated 17/6/98 re closing submissions.
426	"	"	Letter from TCFUA to Office of Counsel Assisting dated 18/6/98.
427	"	"	Letter from NPEC, WEL & BPW dated 18/6/98 to Office of Counsel Assisting.
428	Walton	19/6/98	Decision; 8/12/94 Re: Aluminium Industry (Comalco Bell Bay Companies) Award 1983 (56 IR 403).
429	"	"	Decision; 23/1/96 Re: Australian Manufacturing Workers' Union & Ors. And Alcoa of Austrasia Ltd (Weipa Case) (63 IR 138).
430	"	"	Statement of BRENDA JANE SEYMOUR dated 15/5/98.
431	"	"	Statement of RICHARD PAUL IRVING dated 29/5/98.
432	"	"	Statement of RAYMOND HUGH CAVENAGH dated 15/5/98.
433	Walton	22/6/98	Submissions by Human Rights and Equal Opportunity Commission.
434	"	"	Submissions by Public Service Association.

435	Walton	22/6/98	Article by D Grimshaw & J Rubery - Labour Market and Social Policy - Occasional Papers No. 26 - "The Contentration of Women's Employment and Relative Occupational Pay: A Statistical Framework for Comparative Analysis".
436	"	"	Outline of Submissions by Labor Council.
437	"	"	Presentation of Submissions by Labor Council.
438	Walton	24/6/98	Final submissions by the National Pay Equity Coalition (NPEC), the Women's Electoral Lobby (WEL) and the Australian Federation of Business and Professional Women's Association (AFBPWA).
439	"	"	Bundle of documents re final submissions by Human Rights and Equal Opportunity Commission.
440	"	"	Final submissions of Crown Parties.
441	Walton	25/6/98	Final submissions of ACM parties by A Britt.
442	Britt	"	Areas of Agreement Based on Outline of Submissions by A Britt.
443	"	"	Overview of Recommendations by A Britt.
444	"	"	Response to Other Parties Recommendations of a Remedial Nature by A Britt.
445	Walton	"	OECD Report "Employment Outlook" June 1998.

446	Walton	3/7/98	Submissions of Employers' Federation and Chamber of Manufactures (filed by EF).
447	"	"	List of Employers' Federation Affiliated Organisations.
448	"	"	Recommendations of Employers' Federation and Chamber of Manufactures (filed by CM)
449	"	"	Further Submissions on behalf of Public Service Association.
450	"	"	Summary of Findings and Recommendations sought by Public Service Association.
451	"	"	Addendum to Final Submissions by Human Rights and Equal Opportunities Commission.
452	"	"	Summary of Recommendations and Findings etc. by National Pay Equity Coalition, Women's Electoral Lobby and Australian Federation of Business and Professional Women.
453	"	"	Findings: Crown Parties.
454	"	"	Replacement of Ex.437 - Labor Council Presentation of Final Submissions.
455	"	"	Replacement of Ex.436 - Labor Council Outline of Submissions.
456	"	"	Further Final Submissions by NPEC, WEL and AFBPW.
457	"	"	Index of References in Crown Submissions re Issues Paper.
458	"	"	Crown Parties: Main Points of Agreement or Disagreement.

459

Walton

3/7/98

Final Submissions on behalf of
Crown Parties.
