

Monday, 10 November 2014

Justice Ian Ross  
President  
Fair Work Commission  
Level 4, 11 Exhibition Street  
Melbourne, Vic, 3000

Dear Justice Ross,

**Re: Review of modern awards – casual and part-time employment**

We write on behalf of our client, the Recruitment and Consulting Services Association (RCSA), in relation to the 4 yearly review of modern awards and, in particular, the issue of casual and part-time employment.

Further to our submission to you on 1 October, Corporate Members of the RCSA are, in the main, providers of on-hire employee services and are unique in comparison to other interested parties in that they employ individuals that work under almost every modern award.

With employees employed under almost every modern award, the RCSA is left in the challenging position of having a genuine interest in the review over 100 awards whilst, at the same time, also being a small industry association with limited resources to allocate to a modern award review process.

Because of this unique status, and the likely submission of most employer groups that casual and part-time provisions should be dealt with on an award-by-award basis, rather than as a common issue, we write on behalf of RCSA to request an extension to the 11 November deadline for filing the RCSA submission on casual and part-time employment. We make this request on the basis that the RCSA submission, on how award casual and part-time provisions should be dealt with, will be significantly influenced by the position of the employer and union parties which have 'historical ownership' of such awards and a significant number of members covered by them.

On the basis of the unique position of RCSA and its members we request that our client be provided with the opportunity to file their submission, on the items outlined in Attachment A under Part-Time employment and casual employment, no later than midday on 14 November 2014.

We trust that you understand the unique position of the on-hire employee service sector in making this request and, should you desire it, we would be happy to hold discussions with you in support of our request.

Yours sincerely,



Charles Cameron  
**Executive Director**

