

**Matter Nos: AM2020/99, AM2021/63, AM2021/65**

**Name: Work value case – aged care industry**

Before an Expert Panel for pay equity in the Care and Community Sector  
(Hatcher J, Asbury VP, O'Neill DP, Prof Baird, Dr Risse)



FairWork  
Commission

## **LIST OF EXHIBITS**

EXHIBIT NO.	DATE TENDERED	TENDERED BY	DESCRIPTION	TRANSCRIPT REFERENCE
HSU 1	26/04/22	HSU	Witness statement of Gerard Hayes	
HSU 2	26/04/22	HSU	Amended witness statement of Lauren Hutchins	
HSU 3	26/04/22	HSU	Reply witness statement of Lauren Hutchins	
HSU 4	26/04/22	HSU	Amended witness statement of Christopher Friend	
HSU 5	26/04/22	HSU	Supplementary witness statement of Christopher Friend	
HSU 6	29/04/22	HSU	Witness statement of Mark Castieau	
HSU 7	29/04/22	HSU	Reply witness statement of Mark Castieau	
HSU 8	29/04/22	HSU	Witness statement of Paul Jones	
HSU 9	29/04/22	HSU	Reply witness statement of Paul Jones	
HSU 10	29/04/22	HSU	Witness statement of Virginia Ellis	
HSU 11	29/04/22	HSU	Reply witness statement of Virginia Ellis	
HSU 12	29/04/22	HSU	Witness statement of Donna Kelly	
HSU 13	29/04/22	HSU	Reply witness statement of Donna Kelly	
HSU 14	29/04/22	HSU	Witness statement of Jade Gilchrist	
HSU 15	29/04/22	HSU	Amended reply witness statement of Jade Gilchrist	
HSU 16	29/04/22	HSU	Amended witness statement of Kerrie Boxsell	
HSU 17	29/04/22	HSU	Reply witness statement of Kerrie Boxsell	
HSU 18	29/04/22	HSU	Witness statement of Fiona Gauci	
HSU 19	29/04/22	HSU	Reply witness statement of Fiona Gauci	
HSU 20	29/04/22	HSU	Witness statement of Pamela Little	
HSU 21	29/04/22	HSU	Reply witness statement of Pamela Little	
HSU 22	29/04/22	HSU	Amended witness statement of Carol Austen	
HSU 23	29/04/22	HSU	Amended reply witness statement of Carol Austen	
HSU 24	2/05/22	HSU	Witness statement and report of Dr Sara Charlesworth	
HSU 25	2/05/22	HSU	Supplementary witness statement and report of Dr Sara Charlesworth	
HSU 26	2/05/22	HSU	Witness statement and report of Dr Gabrielle Meagher	
HSU 27	2/05/22	HSU	Amended supplementary witness statement and report of Dr Gabrielle Meagher	
HSU 28	2/05/22	HSU	Witness statement of Marion Jennings	
HSU 29	2/05/22	HSU	Reply witness statement of Marion Jennings	

EXHIBIT NO.	DATE TENDERED	TENDERED BY	DESCRIPTION	TRANSCRIPT REFERENCE
HSU 30	2/05/22	HSU	Witness statement of Lindy Twyford	
HSU 31	2/05/22	HSU	Reply witness statement of Lindy Twyford	
HSU 32	2/05/22	HSU	Witness statement of David Eden	
HSU 33	3/05/22	HSU	Witness statement of James Eddington	
HSU 34	3/05/22	HSU	Witness statement and report of Professor Susan Kurrle	
HSU 35	3/05/22	HSU	Witness statement of Lyn Cowan	
HSU 36	3/05/22	HSU	Reply witness statement of Lyn Cowan	
HSU 37	3/05/22	HSU	Witness statement of Alison Curry	
HSU 38	3/05/22	HSU	Reply witness statement of Alison Curry	
HSU 39	3/05/22	HSU	Amended witness statement of Susan Digney	
HSU 40	4/05/22	HSU	Witness statement of Josephine Peacock	
HSU 41	4/05/22	HSU	Witness statement of Helen Platt	
HSU 42	4/05/22	HSU	Witness statement of Michelle Harden	
HSU 43	4/05/22	HSU	Reply witness statement of Michelle Harden	
HSU 44	4/05/22	HSU	Witness statement of Antoinette Schmidt	
HSU 45	4/05/22	HSU	Reply witness statement of Antoinette Schmidt	
HSU 46	4/05/22	HSU	Witness statement of Camilla Sedgman	
HSU 47	4/05/22	HSU	Amended witness statement of Sanu Ghimire	
HSU 48	4/05/22	HSU	Witness statement of Kristy Youd	
HSU 49	4/05/22	HSU	Reply witness statement of Kristy Youd	
HSU 50	4/05/22	HSU	Julie Kupke	
HSU 51	4/05/22	HSU	Amended witness statement of Jennifer Wood	
HSU 52	4/05/22	HSU	Amended witness statement of Veronique Vincent	
HSU 53	5/05/22	HSU	Witness statement of Lynette Flegg	
HSU 54	5/05/22	HSU	Reply witness statement of Lynette Flegg	
HSU 55	5/05/22	HSU	Witness statement of Peter Doherty	
HSU 56	5/05/22	HSU	Witness statement of Catherine Evans	
HSU 57	5/05/22	HSU	Reply witness statement of Catherine Evans	
HSU 58	5/05/22	HSU	Witness statement of Bridget Payton	
HSU 59	5/05/22	HSU	Reply witness statement of Bridget Payton	
HSU 60	5/05/22	HSU	Witness statement of Sandra O'Donnell	
HSU 61	5/05/22	HSU	Reply witness statement of Sandra O'Donnell	
HSU 62	5/05/22	HSU	Witness statement of Charlene Glass	
HSU 63	5/05/22	HSU	Reply witness statement of Charlene Glass	
HSU 64	5/05/22	HSU	Witness statement of Marea Phillips	
HSU 65	5/05/22	HSU	Witness statement of Kathleen Sweeney	
HSU 66	5/05/22	HSU	Reply witness statement of Kathleen Sweeney	
HSU 67	6/05/22	HSU	Witness statement of Darren Kent	
HSU 68	6/05/22	HSU	Reply witness statement of Darren Kent	
HSU 69	6/05/22	HSU	Amended witness statement of Michael Purdon	
HSU 70	6/05/22	HSU	Witness statement of Anita Field	
HSU 71	6/05/22	HSU	Witness statement of Theresa Heenan	

EXHIBIT NO.	DATE TENDERED	TENDERED BY	DESCRIPTION	TRANSCRIPT REFERENCE
HSU 72	6/05/22	HSU	Reply witness statement of Theresa Heenan	
HSU 73	9/05/22	HSU	Witness statement and report of Professor Kathleen Eagar	
HSU 74	9/05/22	HSU	Supplementary witness statement and report of Professor Kathleen Eagar	
HSU 75	9/05/22	HSU	Witness statement of Kevin Mills	
HSU 76	10/05/22	HSU	Witness statement of Susanne Wagner	
HSU 77	2/06/22	HSU	Witness statement of Eugene Basciuk	
HSU 78	22/04/21	HSU	Witness statement of Leigh Svendsen	
HSU 79	6/10/21	HSU	Witness statement of Lorri Seifert	
HSU 80	29/03/21	HSU	Witness statement of Sally Fox	
HSU 81	28/10/21	HSU	Supplementary witness statement of Sally Fox	
HSU 82	23/03/21	HSU	Witness statement of Tracy Roberts	
HSU 83	31/03/22	HSU	Reply witness statement of Tracy Roberts	
ANMF 1	2/05/22	ANMF	Amended witness statement and report of Associate Professor Anne Junor	
ANMF 2	2/05/22	ANMF	Amended witness statement and report of Associate Professor Smith and Dr Lyons	
ANMF 3	2/05/22	ANMF	Amended witness statement of Annie Butler	
ANMF 4	3/05/22	ANMF	Witness statement of Julianne Bryce	
ANMF 5	3/05/22	ANMF	Amended witness statement of Kathryn Chrisfield	
ANMF 6	3/05/22	ANMF	Amended witness statement of Andrew Venosta	
ANMF 7	3/05/22	ANMF	Amended witness statement of Paul Gilbert	
ANMF 8	6/05/22	ANMF	Witness statement of Lisa Bayram	
ANMF 9	6/05/22	ANMF	Amended witness statement of Suzanne Hewson	
ANMF 10	6/05/22	ANMF	Amended witness statement of Virginia Mashford	
ANMF 11	6/05/22	ANMF	Amended witness statement of Rose Nasemena	
ANMF 12	6/05/22	ANMF	Witness statement of Christine Spangler	
ANMF 13	9/05/22	ANMF	Witness statement of Robert Bonner	
ANMF 14	9/05/22	ANMF	Amended witness statement of Wendy Knights	
ANMF 15	9/05/22	ANMF	Amended witness statement of Stephen Voogt	
ANMF 16	9/05/22	ANMF	Witness statement of Dianne Power	
ANMF 17	9/05/22	ANMF	Witness statement of Jocelyn Hofman	
ANMF 18	9/05/22	ANMF	Amended witness statement of Patricia McLean	
ANMF 19	9/05/22	ANMF	Amended witness statement of Linda Hardman	
ANMF 20	9/05/22	ANMF	Witness statement of Sherree Clarke	
ANMF 21	10/05/22	ANMF	Witness statement of Irene McInerney	
ANMF 22	29/10/21	ANMF	Witness statement of Kevin Crank	
ANMF 23	14/09/21	ANMF	Witness statement of Kristen Wischer	

EXHIBIT NO.	DATE TENDERED	TENDERED BY	DESCRIPTION	TRANSCRIPT REFERENCE
ANMF 24	9/05/22	ANMF	Amended further witness statement of Kristen Wischer	
ANMF 25	10/05/22	ANMF	Amended witness statement of Hazel Bucher	
ANMF 26	29/10/21	ANMF	Witness statement of Maree Bernoth	
ANMF 27	9/05/22	ANMF	Amended witness statement of Pauline Breen	
UWU 1	10/05/22	UWU	Amended witness statement of Paula Wheatley	
UWU 2	10/05/22	UWU	Witness statement of Ngari Inglis	
UWU 3	10/05/22	UWU	Witness statement of Teresa Hetherington	
UWU 4	10/05/22	UWU	Witness statement of Catherine Goh	
UWU 5	10/05/22	UWU	Witness statement of Susan Morton	
UWU 6	10/05/22	UWU	Witness statement of Maria Moffat	
UWU 7	10/05/22	UWU	Witness statement of Jane Wahl	
UWU 8	10/05/22	UWU	Witness statement of Lillian Grogan	
UWU 9	11/05/22	UWU	Witness statement of Karen Roe	
UWU 10	11/05/22	UWU	Witness statement of Ross Heyen	
UWU 11	11/05/22	UWU	Witness statement of Sandra Hufnagel	
UWU 12	11/05/22	UWU	Witness statement of Lyndelle Parke	
UWU 13	11/05/22	UWU	Witness statement of Geronima Bowers	
UWU 14	11/05/22	UWU	Witness statement of Judeth Clarke	
UWU 15	11/05/22	UWU	Witness statement of Donna Cappeluti	
UWU 16	7/10/21	UWU	Witness statement of Melissa Coad	
UWU 17	28/09/21	UWU	Witness statement of Susan Toner	
JE 1	11/05/22	Joint Employers	Witness statement of Paul Sadler	
JE 2	11/05/22	Joint Employers	Amended witness statement of Anna-Maria Wade	
JE 3	12/05/22	Joint Employers	Witness statement of Mark Sewell	
JE 4	12/05/22	Joint Employers	Witness statement of Kim Bradshaw	
JE 5	12/05/22	Joint Employers	Amended witness statement of Craig Smith	
JE 6	12/05/22	Joint Employers	Witness statement of Emma Brown	
JE 7	12/05/22	Joint Employers	Witness statement of Sue Cudmore	
JE 8	12/05/22	Joint Employers	Witness statement of Johannes Brockhaus	
JE 9	12/05/22	Joint Employers	Witness statement of Cheyne Woolsey	
HSU1-13F	13/02/23	HSU (Gibian)	Second supplementary witness statement of Kathleen Eagar, 20 Jan 2023	PN181
JE1-13F	13/02/23	Joint Employers (Ward)	Witness statement of Johannes Brockhaus, 9 Feb 2023	PN184

EXHIBIT NO.	DATE TENDERED	TENDERED BY	DESCRIPTION	TRANSCRIPT REFERENCE
JE2-13F	13/02/23	Joint Employers (Ward)	Witness statement of Michelle Jenkins, 9 Feb 2023	PN185
JE3-13F	13/02/23	Joint Employers (Ward)	Witness statement of James Shaw, 9 Feb 2023	PN185
JE4-13F	13/02/23	Joint Employers (Ward)	Witness statement of Grant Corderoy, 8 Feb 2023	PN212
HSU2-13F	13/02/23	HSU (Gibian)	StewartBrown Aged Care Financial Performance Survey Sector Report to 30 June 2022	PN329
HSU 84	04/12/23	HSU (Gibian / Doust)	Witness statement of Carolyn Moorfield, 19 Sept 2023	
HSU 85	04/12/23	HSU (Gibian / Doust)	Third witness statement of Catherine Evans, 19 Sept 2023	
HSU 86	04/12/23	HSU (Gibian / Doust)	Witness statement of Renier Du Plessis, 22 Sept 2023	
HSU 87	04/12/23	HSU (Gibian / Doust)	Witness statement of Jeremy Harrison, 21 Sept 2023	
HSU 88	04/12/23	HSU (Gibian / Doust)	Witness statement of Paul Jones, 20 Sept 2023	
HSU 89	04/12/23	HSU (Gibian / Doust)	Witness statement of Rhonda Jones, 20 Sept 2023	
HSU 90	04/12/23	HSU (Gibian / Doust)	Witness statement of Susan Digney, 15 Sept 2023	
HSU 91	04/12/23	HSU (Gibian / Doust)	Witness statement of Terri Francis, 21 Sept 2023	
HSU 92	04/12/23	HSU (Gibian / Doust)	Witness statement of Teresa Laidlaw, 14 Sept 2023	
HSU 93	04/12/23	HSU (Gibian / Doust)	Witness statement of Kelvin Evans, 21 Sept 2023	
ANMF 28	04/12/23	ANMF (McKenna / Hartley)	Report of Assoc Prof Noleen Bennett, 'Independent Infection Prevention and Control Expert Opinion', filed 15 Sept 2023	
ANMF 29	04/12/23	ANMF (McKenna / Hartley)	Further witness statement of Kathryn Chrisfield, 15 Sept 2023	

EXHIBIT NO.	DATE TENDERED	TENDERED BY	DESCRIPTION	TRANSCRIPT REFERENCE
ANMF 30	04/12/23	ANMF (McKenna / Hartley)	Second witness statement of Hazel Bucher, 15 Sept 2023	
ANMF 31	04/12/23	ANMF (McKenna / Hartley)	Further witness statement of Stephen Voogt, 15 Sept 2023	
ANMF 32	04/12/23	ANMF (McKenna / Hartley)	Witness statement of Joanne Purdue with annexures JP-1 and JP-2, 15 Sept 2023	
ANMF 33	04/12/23	ANMF (McKenna / Hartley)	Witness statement of Heila Brooks, 15 Sept 2023	
ANMF 34	04/12/23	ANMF (McKenna / Hartley)	Further witness statement of Julianne Bryce with annexures JB 1 to JB 6, 1 Nov 2023	
UWU 18	04/12/23	UWU (Harrison)	Witness statement of Lynnette Hutchinson	
UWU 19	04/12/23	UWU (Harrison)	Witness statement of Amanda Wallen	
UWU 20	04/12/23	UWU (Harrison)	Witness statement of Peter Dewar	
UWU 21	04/12/23	UWU (Harrison)	Witness statement of Stephen Morgan	
UWU 22	04/12/23	UWU (Harrison)	Witness statement of Mitchell Wood	
UWU 23	04/12/23	UWU (Harrison)	Witness statement of Delia Lord	
UWU 24	04/12/23	UWU (Harrison)	Witness statement of Emily Lipps	
UWU 25	04/12/23	UWU (Harrison)	Witness statement of Carolyn Smith	
HSU 94	04/12/23	HSU (Gibian)	Witness statement of Christopher Friend with annexures CF1 to CF3, 22 Sept 2023	
JE 10	04/12/23	JE (Ward)	HSU template enterprise agreement	
JE 11	04/12/23	JE (Ward)	<i>Arcare Pty Ltd, NSWNMA / ANMF NSW Branch and HSU New South Wales Branch, (NSW and ACT) Enterprise Agreement 2023</i>	
HSU 95	04/12/23	HSU (Gibian)	Witness statement of Alison Guevara, 21 Sept 2023	
HSU 96	04/12/23	HSU (Saunders)	Witness statement of Catherine Watson with annexures CW-01 to CW-04, 21 Sept 2023	
HSU 97	04/12/23	HSU (Gibian)	Witness statement of Fleur Collins, 22 Sept 2023	
HSU 98	04/12/23	HSU (Gibian)	Witness statement of Carina Moll, 21 Sept 2023	
HSU 99	04/12/23	HSU (Saunders)	Witness statement of Michelle Giaquinto, 21 Sept 2023	

EXHIBIT NO.	DATE TENDERED	TENDERED BY	DESCRIPTION	TRANSCRIPT REFERENCE
HSU 100	05/12/23	HSU (Gibian)	Witness statement of Karen Marshall, 21 Sept 2023	
HSU 101	05/12/23	HSU (Gibian)	Supplementary witness statement of Virginia Ellis, 20 Sept 2023	
UWU 26	05/12/23	UWU (Harrison)	Witness statement of Jessica Hood with annexure JH-1, filed 15 Sept 2023	
JE 12	05/12/23	JE (Ward)	<i>Residential Aged Care and Community Services Enterprise Agreement 2016</i> (Resthaven Inc)	
UWU 27	05/12/23	UWU (Harrison)	Witness statement of Julie Holmes with annexures JH-1 and JH-2, filed 15 Sept 2023	
JE 13	05/12/23	JE (Rafter)	<i>BlueCare Care and Support Employees Enterprise Agreement 2023</i>	
HSU 102	05/12/23	HSU (Gibian)	Supplementary witness statement of Dr Sara Charlesworth and Dr Gabrielle Meagher with annexure ('Joint 2023 Supplementary Report'), 30 Oct 2023 with the following amendments <u>to the annexure</u> : <ul style="list-style-type: none"> <li>At [12] (DHB 477): 'fluctuating' replaces 'changing'</li> <li>At [22] (DHB 482): 'SCHCDS' replaces 'SCHADS'</li> </ul> At [33] (DHB 486), at the end of the dot point commencing 'Under "Specialist Knowledge and skills" we have:...', 'goal' replaces 'gaol'.	
HSU 103	05/12/23	HSU (Gibian)	<i>Care Worker Employees - Department of Family and Community Services - Ageing Disability and Home Care (State) Award 2014</i> (NSW)	
JE 14	05/12/23	JE (Ward)	Australian Government document (unit of competency) HLTHSPS 007- <i>Administer and monitor medications</i>	
UWU 28	06/12/23	UWU (Harrison)	Witness statement of Tania Jesser with annexures TJ-1 to TJ-7, 15 Sept 2023	
UWU 29	06/12/23	UWU (Harrison)	Witness statement of Bianca Wren with annexures BW-1 to BW-5, 15 Sept 2023	
JE 15	06/12/23	JE (Ward)	<i>Bolton Clarke (Allity) Enterprise Agreement (South Australia) 2022</i>	
UWU 30	06/12/23	UWU (Harrison)	Witness statement of Heather Pumpa, 15 Sept 2023	
ANMF 35	06/12/23	ANMF (Hartley)	Further witness statement of Robert Bonner with annexures RB 6 and RB 7, 15 Sept 2023 <ul style="list-style-type: none"> <li>At [11] (DHB 689): 'time' replaces 'tome'</li> <li>At [22] (DHB 691), 'would be' replaces 'being'</li> </ul>	

EXHIBIT NO.	DATE TENDERED	TENDERED BY	DESCRIPTION	TRANSCRIPT REFERENCE
JE 16	07/12/23	JE (Ward)	<p>Witness statement of Stuart Hutcheon, 31 Oct 2023</p> <ul style="list-style-type: none"> <li>At [1] (DHB 2951), 'Managing Partner' replaces 'Partner'</li> <li>At [5] (DHB 2951), 'with in' replaces 'within'</li> </ul> <p>Final paragraph of statement (DHB 2952) should be numbered '[13]'</p>	
JE 17	07/12/23	JE (Ward)	Witness statement of Louanne Riboldi, 31 Oct 2023	
ANMF 36	07/12/23	ANMF (McKenna)	Royal Freemasons' Benevolent Institution 'Outbreak management' protocol	
ANMF 37	07/12/23	ANMF (McKenna)	Further witness statement of Annie Butler with annexures AB 9 and AB 10, 1 Nov 2023	
JE 18	07/12/23	JE (Ward)	The Australian National Aged Care Classification AN-ACC funding guide	
JE 19	07/12/23	JE (Ward)	HLTHPS006 - <i>Assist clients with medication</i>	
JE 20	07/12/23	JE (Ward)	CHC33021 - <i>Certificate III in Individual Support</i>	
HSU 104	07/12/23	HSU (Gibian)	Exemplar Nursing Occupational Award	
<p><i>Handed up on 07/12/23 but not separately marked: item reference (NOT exhibit) ANMF 23 from the ANMF's original tender bundle – Nursing and Midwifery Board of Australia Registered Nurse Standards for Practice – stage 1 DHB at 21360 – <b>now part of exhibit ANMF 38</b></i></p>				
JE 21	08/12/23	JE (Ward)	Third witness statement of Johannes Brockhaus, 31 Oct 2023	
JE 22	08/12/23	JE (Ward)	Witness statement of Chris Mamarelis, 1 Nov 2023	
<p><i>Handed up on 08/12/23 but not marked: item reference (NOT exhibit) ANMF 55 from the ANMF's original tender bundle – Guidance and Resources for Providers to support the Aged Care Quality Standards – stage 1 DHB at 27025 – <b>now part of exhibit ANMF 38</b></i></p>				
JE 23	11/12/23	JE (Ward)	Email from Lucinda Shields with subject 'Uniting Springwood: Increased Covid-19 precautions - Masks and RAT testing now required', 16 Nov 2023	
ANMF 38	14/12/23	ANMF	ANMF Tender Bundle (from stage 1)	
ANMF 39	14/12/23	ANMF	CHCAGE005 – <i>Provide support to people living with dementia</i>	
ANMF 40	14/12/23	ANMF	CHCPAL001 – <i>Deliver care services using a palliative approach</i>	
ANMF 41	14/12/23	ANMF	CHCDIV001 – <i>Work with Diverse People</i>	
ANMF 42	14/12/23	ANMF	Redacted My Care Plan	
ANMF 43	14/12/23	ANMF	Admission Day checklist	
ANMF 44	14/12/23	ANMF	Admissions Team checklist	
ANMF 45	14/12/23	ANMF	Pre-Admission checklist	
ANMF 46	14/12/23	ANMF	HLT54121 – <i>Diploma of Nursing</i>	
ANMF 47	14/12/23	ANMF	Spotlight Research Report	
ANMF 48	14/12/23	ANMF	Redacted Electronic Care Plan	



EXHIBIT NO.	DATE TENDERED	TENDERED BY	DESCRIPTION	TRANSCRIPT REFERENCE
ANMF 49	14/12/23	ANMF	Effective incident management systems: Best practice guidance	
ANMF 50	14/12/23	ANMF	Australian Aged Care Collaboration Media Release 1 March 2022	
ANMF 51	14/12/23	ANMF	Australian Aged Care Collaboration Media Release 22 March 2022	
ANMF 52	14/12/23	ANMF	Serious Incident Response Scheme – Guidelines for residential aged care providers	
ANMF 53	14/12/23	ANMF	Residential Aged Care Quality Indicators – October to December 2021	