9 April 2021

Mr James Canavan
R/ Industrial Relations Manager
People & Safety
TAFE NSW
Level 2, Building A,
Mary Ann Street
ULTIMO NSW 2007

By email: james.canavan@tafensw.edu.au

Dear Mr Canavan,

Re: CPSU NSW Submission- Student Services Branch-Tranche 1 Facilities Management & Logistics

The following represents the CPSU NSW's submission (the Submission) in relation to the Draft Change Management Plans for Student Services Branch – Tranche 1 and Facilities Management & Logistics released to the union for consultation on 16/02/2021.

This document has been prepared through consultation with CPSU NSW Members and representatives at all colleges throughout NSW. After careful consideration of practical operations from those involved in performing the various roles, comments have been made, concerns raised, and at times suggestions made as to how operations suggested in the Submission may work more effectively. This document also argues for additional steps as part of the Placement Processes in both respective Change Plans. This document is not exhaustive, and includes comments on Methodology used to formulate the original Submission, and notes some issues only in point form so further discussion can take place.

It is important to note upfront the proposal to reduce up to 226 roles in regional NSW and 302 roles in Sydney metro undermines TAFE's commitments under the *Technical and Further Education Commission Act 1990 Act* objectives by negatively impacting on the communities which, in the broad sense, TAFE is meant to support.

160 Clarence Street, Sydney NSW 2000   **T** 1300 772 679   **W** www.psa.asn.au
GPO Box 3365, Sydney NSW 2001   **F** (02) 9262 1623   **E** cpsu.nsw@psa.asn.au

The CPSU NSW is the Federal Counterpart of the Public Service Association of NSW. CPSU NSW members are also members of the PSA.

Objective E of the *NSW Government (2018) Technical and Further Education Commission Act 1990 No 118* states that TAFE NSW is to "provide educationally or vocationally disadvantaged groups (such as women, Aborigines, persons of non-English speaking background, persons with disabilities and persons in rural areas) with access to technical and further education services, including a range of appropriate specialised services".

It is also important to note upfront that Steffen Faurby MD's repeated insistence in the media and elsewhere that these two restructures will result in only 50 job losses in total has engendered a deep sense of distrust felt by many TAFE employees towards their leader as reflected in the most recent organisational health survey where only 22% of TAFE employees believe TAFE NSW "cares and is committed to them."

BACKGROUND:

Several meetings have taken place throughout TAFENSW colleges seeking feedback from CPSU NSW staff members in affected operational areas. Staff welcome the opportunity to be part of the OneTAFE model for the future and believe that only with their input will the design of an optimum model be achieved. Delegates have been selected to discuss members' concerns and formulate a response which is tabled here. In addition, various working parties were established, comprising delegates as well as identified subject matter specialist (SMEs) – the end product of each work party's deliberations can be found below. We believe that before a structure can be decided upon that practical consideration of the tasks that need to be performed, and the manner in which they are performed, needs to take place.

EXPEDITING LONG-TERM CASUAL AND HIGHER DUTIES CONVERSIONS:

It has become apparent that TAFE is not willing to convert higher duties conversion applications or long-term casual conversion applications. As we understand it, TAFE is only prepared to convert long-term at grade staff – where they meet the criteria outlined in Clause 17 of the *TAFE Commission Administrative, Support and Related Employees Enterprise Agreement 2019* (the EA), whereas it is not prepared to convert higher duties applicants or long-term casual applicants on the flawed reasoning that there are no similar EA provisions which compel TAFE to convert in this regard. The CPSU NSW strongly objects to TAFE's decision since:

- The non-conversion of higher duties applicants will create very glaring and harsh inequities, insofar as
  (a) there will be successful higher duties applicants who will have been converted prior to the release of the Draft CMP, who will have colleagues in their same unit who have similarly submitted applications for permanency and through no fault of their own did not get approval for conversion prior to the release of the Draft CMP. CPSU NSW submits higher duties members who has an application for permanency submitted prior to the release of the Draft CMP need to have their application attended to with urgency, because as we have said it is not acceptable that they are at same priority as a non-merit selected/two years + employee.
- For the same reasons as outlined above in (a), casual conversion applications need to be looked at on a case-by-case basis to determine if the ongoing work

criteria is met in an individual's circumstance. This needs to be addressed after careful consideration from the given line manager and BP. Particularly, the CPSU NSW has grave concerns that TAFE is apparently no longer considering the conversions of

We look forward to further discussion on each, as agreed in recent conversations.

PLACEMENT PROCESS:

1) Currently the Placement Process for both Change Plans outlines at 10.2 the "Employee Eligibility for Step 1 and 2". TAFE has agreed previously that a permanent employee will be prioritised ahead of an "eligible long-term temporary (more than two years)" or an "eligible employee on higher duties (more than two years)". There is nothing explicit in the placement process which compels a hiring manager to prioritise a permanent employee ahead of the two non-permanent categories of long-term temporary or long-term higher duties. CPSU NSW submits that 10.2 must include an explicit directive to this end. This may include a further two steps within steps 1 and 2, namely Steps 1(a) and 2(a).

Further, the CPSU NSW submits its preference however, that is that staff who are currently acting in a higher graded position without merit or are temporary employees for more than two years without merit should not be considered at Steps 1/2. They should be eligible at the additional Step 3 outlined directly below. The reason is it is unfair since non merit can opt out at the end of consultation - they have a choice to go back to their substantive position. It is requested TAFE implement this suggestion to the placement process.

2) Members are deeply concerned at the present draft placement process which allows all unaffected TAFE staff to compete for any unfilled roles following steps 1 and 2. CPSU NSW submits that TAFE must foremost look to take care of its affected staff and not burden them with having to face an additional (and unnecessary) hurdle of having to compete with non-affected staff. CPSU NSW submits that TAFE needs to amend the current step 3 such that only affected at grade staff are able to apply, and then include an additional step after Step 3 i.e. a new Step 4, whereby "Positions not filled through Steps 1, 2 and 3 will be internally advertised for merit based selection", and "All other TAFE NSW employees can apply for any positions advertised". At grade applicants should be prioritised in this new step 4 process.

3) It is apparent that there is a significant number of agency staff in impacted roles and who have been working for the organisation for many years. It would serve the interests of the organisation if it were to maintain (and bring into the TAFE employ) as many of these experienced staff as possible into the new structure. To this end TAFE can address this by the inclusion of a further step in the placement process (Step 5) to allow for current agency staff to apply ahead of the open market.

4) Step 3 in the placement process should, as a matter of fairness and practicality, be undertaken in such a way that employees in higher graded positions cannot easily displace workers currently occupying lower graded positions. Currently,

when all positions not filled in Steps 1 and 2 are opened for application and interview in Step 3, they are all listed at the same time. This allows employees to 'hedge their bets' by applying for positions at lower grades as a contingency for securing employment in case they are not successful in obtaining their preferred position. In practice, employees are appointed at lower graded positions *before* their application at higher graded positions is considered – they then accept the lower graded position out of fear of not receiving any other offer, and being left displaced or redundant.

The effect of this is that employees currently in lower graded positions who are applying for lower graded positions at Step 3 cannot compete with the applicants coming from higher TWL roles or in some cases TM roles – not because they couldn't do the job but because they were displaced by someone over-qualified who might have been successful at gaining a higher graded position had that application and interview process been finalised before that of the lower graded positions.

5) Ultimately this means that CPSU NSW members on lower grades have the lowest probability of securing a role in the proposed structure, and for no reason that benefits the business. It also means that more positions at higher levels of responsibility could potentially be left vacant and to be filled in the open labour market at Step 4, meaning more managers in the proposed structure will be people with no experience working in TAFE than would otherwise be the case. **The solution** to this problem is to only accept applications, interview, and appoint candidates for positions at Step 3 in single-grade groups starting from the highest TM grade and finishing at the lowest TWL grade, in descending order, with one grade-group of new positions not being open for application until the previous grade-group of positions are filled.

Under such an approach, higher-graded employees who are not successful at gaining the higher graded positions can still go on to apply for the lower graded positions, but there will be no incentive for them to 'panic-apply' and accept jobs that represent other employees' only chance at retaining employment with TAFE NSW. This would also reduce the overall number of applications required to be processed by TAFE NSW and would therefore be more efficient. It would also reduce the number of positions left vacant at Step 4, and retain a greater proportion of the current employees of TAFE NSW in employment with TAFE NSW, in line with TAFE NSW's stated policy of internal development and retention of staff and the stated values of its leadership.

6) Appeals process for employees who disagree with the judgement of the interview panels is not transparent. Employees are receiving responses to appeals that do not include the reasoning behind the refusal to reconsider or the reasoning behind the unfavourable judgements.
Some employees have been told that there is no appeals process, and managers are giving inconsistent responses verbally to their team members, causing more confusion and distress.
The union requests that all staff be given the right to appeal and that the appeal

process be documented and that the documentation be provided to the employee (and to the union where requested by union members).

The union also strongly objects to the use of contracted staff in any part of the recruitment process including interview panels or referee checks, particularly in the case where those panellists are either agency staff or external employees of contracted agencies such as Hudson. We do not believe that persons not employed directly in the NSW public sector can competently and equitably examine the relative merits of applicants in a public sector context, and that applicants subject to such a process will face unfair and detrimental outcomes   due to:

- the lack of understanding of the merits of their applications both in writing and in-person interviews, and;

- there being no obligation to adhere to the same stringent code of conduct that TAFE NSW and other public sector employees are. These external panellists have no incentive to resist pressure from interested parties seeking to influence the outcomes of interviews in ways that leave the merits of applications unconsidered or undervalued. This influence can be motivated by a desire to please the client (individuals directly liaising with TAFE NSW), as well as ordinary instances nepotism that are not known about by TAFE or the applicants or other panellists.

POSITION DESCRIPTION REVIEW: STUDENT SERVICES TRANCHE 1 AND FACILITIES MANAGEMENT & LOGISTICS:

There are concerns in the current review of Student Services and Facilities Management & Logistics regarding Position Descriptions. As PDs are used to map staff into the new structure, issues regarding PDs have a significant impact on TAFE NSW's ability to place and retain staff, and on staff well-being and stress going through the process.

The proposed structure and process reflects that Position Descriptions have been mismanaged by TAFE for a long time. This affects entire teams, as well as individuals. There are examples of both individuals and teams who have had their positions mapped to fit a structure often in direct contradiction to what is actually done in the job. In some cases, the existing PDs appear to be have been entirely misunderstood and the specialised skills of teams have not been recognised. The most blatant example is 134 current positions mapped to two "TWL4 Support Officer" positions, despite the range of tasks covered in those 134 jobs being vast and nothing to do with administrative support of high-level managers.

Grading of the proposed positions appear to be inconsistent and the process has not been transparent - there is no guarantee that it has been done to a proper standard.

The overuse of generic PDs means that required skills for positions are not recognised. Staff do not know what any particular position will actually be doing and as such cannot ascertain if their specialised skills map to it. The proposed structure does not try to match skills to the jobs but rather is clearly designed to rely on people working outside their PD.

The staff and the organisation are seeing the consequences of incorrect mapping on the future state, by looking at the stand-up of the Systems Group structure. For example, a developer of 10 years' experience was incorrectly mapped to a Systems Administrator

position, and despite providing feedback during the consultation phase, was appointed to the Systems Administrator position instead of the Developer. He is now under constant pressure to use his developer skills and work outside his new PD (effectively doing the work described in two different PDs). This creates ongoing stress and inefficiencies for the organisation.

1. Staff who have been incorrectly mapped

a. **Incorrect mapping of whole teams:**

i. **134 current positions have been mapped to 2 Support Officer TWL4 positions** (see Position Mapping Tables document pp 7-10). The vast majority of the positions mapped do not undertake the equivalent duties of the draft Support Officer PD. The incorrect mapping includes whole teams of specialist skilled workers who do not have equivalent PD to the Support Officer TWL4 (which is administrative support for high level managers), for example:
   - North Region SALM System team with 4 x SALM Support Officers (Newcastle) and 2 x Data Cleansing Officer* (Newcastle) mapped to Support Officer (page 8 of mapping document).
   - North Region eReporting team
   - North Region VET Student Loans team
   - North Region Coordinators Student Administration (Hunter, 8 positions) were also mapped to the Support Officer Student Administration Services TWL4 position. These positions work in colleges dealing with student transactions. ODP refused to acknowledge this when feedback was given. TWL4 staff were told that they could apply at Step 3 which is unfair given that they should be mapped at Step 1 or 2 and have the opportunity for pooled assessment for TWL4 positions.

ii. No staff have been mapped to TWL8 (see Position Mapping Tables document p 5), yet there are positions within each Region who perform these roles, and who are TWL8, eg from North Region, Leader of Business Systems Implementation and Leader of Business Systems Operations; and in Western Sydney Student Administration Manager.

iii. **Entire teams are being mapped chaotically**: At the briefing on 9th February it was indicated that some teams were not to be included in this stage Eg VSL Teams. However, on 9 Feb, Regional VSL teams received a email indicating they were included. And on 24 March TAFE Digital VET student loan team was told they have been pulled into the restructure late, effectively reducing their consultation time.

BRINGING OUR VISION TO LIFE

This stage
- Offering Management
- Student Enquiries
- Student Sales
- Contact Centres
- Customer Service
- Student Administration
- Campus Management

Next stage
- Aboriginal Services
- Disability Services
- Learning Support Services
- Counselling & Career Centre Services
- Multicultural Services
- Library Services
- Student Associations
- Library Resource Management
- Operations & Regional Support
- VET Student Loans
- Exam Supervision

iv. TAFE NSW Student Services – All Staff Briefing

b. **Individuals who have been incorrectly mapped**

This may be because their position has changed over time; or they are not working in their substantive position; they have never worked in their substantive position; or it is inexplicable. The Union has received up to 100 calls from concerned members.

Individuals have been incorrectly mapped due to the poor management of PDs by TAFE – PDs some of which have not been updated since 2009, and variations in TWLs across subregions, and even within teams, for staff undertaking the same roles. For example,
- *in the Hunter campuses* TWL3 Campus Services Student Administration Coordinators are currently undertaking transactional duties. 60% of what they do can be mapped to TWL4 Student Transactions Officers. They have been asking to have their PDs reviewed for a number of years.
- *In Sydney Region* some the Apprenticeship Team is TWL3 and some are TWL4 yet they are undertaking the same tasks.
  This has not been recognised in the matching process.
- *North Region SALM System team* with 4 x SALM Support Officers* (Newcastle) and 2 x Data Cleansing Officer* (Newcastle) mapped to Support Officer (page 8 of mapping document). *These positions perform exactly the same tasks despite different names. There has been more than one attempt over the last 3 years to have to the position descriptions updated/aligned, however they were advised on each occasion that PDs were not being updated as there was a restructure imminent.

c. **Inequitable and inexplicable mapping of staff to proposed positions**

For example, Western Sydney Team Coordinators Customer Service – six people doing exactly the same role, leading customer service teams in colleges. Four of these positions, Baulkham Hills, Blue Mountains, Nirimba and Richmond,

7

have exactly the same PD - the PD actually specifically refers to these positions. Yet two staff (Baulkham Hills and Richmond) have been mapped to proposed Team Leader TWL6 positions, four staff (Nirimba, Blacktown, Nepean Wentworth Falls) are not.
This is clearly inequitable and unfair. It is a significant disadvantage to enter the placement process at Step 3 instead of Step 1 or 2.

When this issue was raised, individual staff who were not mapped were recommended to complete a PD Addendum. Yet an addendum is to be used when an employee identifies that their current PD is outdated and does not reflect their current the role they undertake – and does not address the situation of inequitable mapping.

3. **Applying for an addendum**

Inconsistent information has been given to staff regarding addendums. There is no clarity transparency and consistency about the process.

For example, eReporting Officer North Region who has been mapped on the basis of a 2011 PD which she considers to be out of date. Her addendum was initially rejected and then withheld because she was verbally told "the whole team would have to be included."

4. **Grading of proposed Position Descriptions**

   a. The Union is requesting transparency on how the proposed PDs have been developed. Who graded these PDs – did they have appropriate training? Was the proper process followed?

   b. The Union has reviewed many positions against the *2019 Enterprise Agreement* Schedule D – Classification Descriptions and Definitions. The following are graded incorrectly:
      i. Facilities Officer TWL4
      iii. Support Officer Student Services TWL4

Incorrect grading i.

   1. New Facilities Officer TWL4 should is grade incorrectly. It should be graded level 5.

The Facilities Officer is, in our view, is graded less than what it should be. It does appear to have been written with the intent that it's a Level 4 position with the higher levels of responsibilities minimised or described in a way that downplays their impact.

The whole point of a restructure, and the power the change management clause gives to employers is to effectively make unilateral changes to the employment contract they have with an employee, the trade-off being they must consult with the employee(s) first, is to enable the employer to determine what each position does do, and what it doesn't do. If current positions perform duties that are not included in the proposed PD, the question is one about where has the employer chooses to place those duties/activities if it's not with that position anymore, and if the answer is nowhere, what are the implications for that decision, and does the employer understand the potential for those implications to be

realised if no-one is performing those functions i.e. who will undertake the security duties TWL1 – TWL3?

This grading is too low (in some locations) as evidenced in the proposed PD; and in practice.

Position Purpose is:

The Facilities Officer is responsible for providing comprehensive facilities and asset management services to a cluster of TAFE NSW sites. The role liaises with contracted service providers and directly performs a range of activities including minor maintenance and repairs, security access, emergency response, stock control, distribution and systems administration, to ensure high standards of amenity, customer service, safety and compliance are achieved and maintained.

Key Accountabilities include:

Applying facilities management knowledge and skills flexibly to ensure allocated work is completed to high standards through contracted services or performance as an in-house team member.

Effectively prioritising the day's work to complete a range of diverse activities as assigned including performance of minor maintenance, supporting and monitoring contracted service providers, and responding to unplanned and urgent matters.

Yet the many relevant Capabilities are foundational for example:

Think and solve problems (they will be making judgements all the time)

Manage self (they will be also monitoring and supporting others)

Work collaboratively (they will be "monitoring and supporting contractors")

Display Resilience & Courage	**Intermediate**
Act with Integrity	Foundational
Manage Self	Foundational
Value Diversity and Inclusion	Foundational
Communicate Effectively	**Intermediate**
Commit to Customer Service	**Intermediate**
Work Collaboratively	Foundational
Influence and Negotiate	Foundational
Deliver Results	Intermediate
Plan And Prioritise	Foundational
Think and Solve Problems	Foundational
Demonstrate Accountability	**Intermediate**
Finance	Foundational
Technology	Foundational

Procurement and	**Intermediate**
Contract Management	
Project Management	Foundational

In Practice:

In 38 colleges there is only one TWL4 Facilities officer. Their managers will be located elsewhere e.g. 50+ km away. They will be responsible for monitoring inducting (i.e. day to day managing) security staff; and on the spot managing emergencies.

For some Colleges this one officer is responsible for two campuses, e.g. one TAFE Worker level 4 Facilities Officer for Blue Mountains College covering Katoomba and Wentworth Falls Campuses. Their manager is 50km away.

In nine regional colleges this position is part time.

Incorrect grading ii.

2. Student Transactions Officer TWL4 is graded incorrectly. It needs to be regraded to a TWL5

5. **'Performance management' Key accountability in Position Descriptions**

The new PDs have a key accountability referring to 'performance management and review plans'.
   For example: *Facilities Officer TWL6*
   14. Collaborate with staff to ensure the development and regular review of meaningful individual **performance management and development plans** that are clearly aligned to strategic objectives and focused to develop the individual.
   and
   Student Enquiry Officer TWL3
   9. Work with the Line Manager to develop and review meaningful **performance management and development plans**.

The more appropriate term would be Performance Development Review Plan (PDRP), as per intranet https://tafensw.sharepoint.com/sites/Int-PerformanceHub/SitePages/Performance-Development-&-PDRPs.aspx . "The Performance Development Review Process (PDRP) is a structured approach to: help employees and managers create a plan of work for the financial year, agree on priorities and how they'll be met; design strategies to address capability gaps; and create an individualised career plan." PDRPs are about staff development to enable the work priorities to be met. They are not about KPIs or managing poor performance.

Performance Management is when a staff member is performing poorly and a plan is developed to improve performance, a PIP. Engaging in Performance Management process is not necessary as an accountability in a Position Description. It is process undertaken by managers to rectify poor performance. It is not appropriate in a PD or in a PDRP.

6. **Issues with proposed generic PD's:**

Generic PDs provided for TWL3, 4, 6 and 8 in Student Services do not recognise the range of specialised abilities (skills and knowledge) covering the variety of administrative functions especially when TAFE processes and computer systems are very complex. The PD does not properly reflect the roles of a particular position.

Generic PDs do not enable or facilitate a proper and accurate matching process. Staff in specialised teams have specialised skills. Staff could be mapped to multiple roles based on their current PDs and due to their work experience and knowledge.

Generic TWL6 and TWL8 PDs are not comparable to current TWL6 and TWL8 roles which are framed around specialised knowledge of business systems rather than supervision.

Generic PDs provide no concrete reporting line structure e.g. for the Generic Team Leader TWL6s the reporting line is 'Assigned relevant Manager/Senior Manager'.

Are ad hoc duties going to be added to all generic PDs? For example:

- Will 248 Student Enquiry Officers allocated to centralised functions be assisting face-to-face-to-face Student Enquiry Officers?
- Will Student Transactions Officers TWL4 be assisting Student Enquiry Officers TWL3 on an ad hoc basis, if they happen to located at relevant colleges? For example, where there are very few Student Enquiry Officers TWL3, who will need assistance at peak times and when they are training or on leave or even having lunch.
- Team Leader Student Administration Services TWL6 - all key accountabilities are team management related – what other roles will they be performing?

Generic PDs will create issues regarding levels of access to business systems. Without the information about which positions are undertaking particular process, a profile of access to business systems cannot be created. Product Offerings requires different profiles to access to EBS than Student Services EBS. There is inbuilt safety and security in segregation of duties.

While TAFE might want complete interchangeability and flexibility between Teams and roles, this does not reflect the current or future reality where task specialisations require knowledge and experience gained over years; and will not enable sound processes.

7. **Proposed structure relies on people working outside their PDs**

70 colleges are left with only 0.6 or 1 Student Enquiry Officer TWL3, **and a further 20 colleges have 1.6 or 2 Student Enquiry Officers**

Inevitably there will be staff shortages with staff taking leave, being sick, doing training, taking a flex day, and at peak periods. When this has been raised in consultation, TAFE has indicated that staff will be pulled from other teams to undertake this work.

TAFE are assuming that there will be SSB staff co-located. This may not necessarily be the case. What if there are no other TWL3s at the college, only TWL4s? Will the TWL4s then be required to undertake TWL3 work?

Secondly, if there are TWL3 co-located at the colleges, the implication is that they will be pulled from other Units to undertake face-to-face student enquiries. What happens to the work and the completion rates of tasks from their substantive position?

As outlined above, these extra roles and duties are not articulated in the proposed generic PDs.

REGIONAL IMPACT: STUDENT SERVICES STAGE 1 AND FACILITIES MANAGEMENT & LOGISTICS REVIEW:

The CPSU NSW has serious concerns in relation the current review of Student Services Branch (SSB) and Facilities Management & Logistics (FM&L) regarding the impact of proposed changes on the regional economies of NSW.

This feedback will outline how the review's proposed changes contradict and work against the objectives of the TAFE Act, particularly regarding rural and regional NSW.

Objective E of the *NSW Government (2018) Technical and Further Education Commission Act 1990 No 118* states that TAFE NSW is to "provide educationally or vocationally disadvantaged groups (such as women, Aborigines, persons of non-English speaking background, persons with disabilities and persons in rural areas) with access to technical and further education services, including a range of appropriate specialised services".

One way in which TAFE operationalises support for Objective E is through the Community Support Obligation (CSO) funding. CSO educational support to 'women, Aborigines, persons of non-English speaking background, persons with disabilities and persons in rural areas', in line with Objective E, is a commitment to 'provide the community or a targeted section of the community with social benefits' (NSW Treasury 2019, p. 1).

The proposal to reduce up to 226 roles in regional NSW undermines such commitments and the TAFE Act objectives by negatively impacting on the communities which, in the broad sense, TAFE is meant to support.

In other words, to eliminate public sector jobs in a rural/regional community, which not only put money into the town but assists people to enrol in VET programmes, in effect disadvantages communities.

While TAFE NSW disputes the actual number of presently filled jobs to be deleted there is consensus on the total number of positions proposed for deletion under this review.

Public sector jobs have a particular significance to regional communities as they help to generate steady consumer spending which in turns sustains locally owned private business. (Henderson, 2018).

The ongoing decline in public sector regional employment between 2011 and 2016 has meant that there are 3,900 fewer state government-funded jobs in NSW.

This represent $325 million in regional wages each year which are no longer spent. This further impact negatively on consumer spending, GDP and state revenues especially when compounded over a longer period.

Such negative impact on regional economies has detrimental consequences for the retention of young people, a key market for TAFE, and the long-term the viability of regional communities.

TAFE jobs in regional NSW are an anchor industry in that they provide base level of quality jobs which anchor the whole community, and which help create and maintain local human capital (Henderson 2018).

The 100 regional jobs to be lost in this restructure will, over the course of this coming decade, cost regional economies in NSW at least $135 Million. This is made up of $85 million in lost wages plus a negative impact of $50 million caused by those wages not being spent in the community as calculated by a 1.5 multiplier (Henderson 2018). This will compound the 'cumulative loss of $2.9 billion in direct wages & salaries; $1.9 billion in foregone consumer spending; $4.3 billion in foregone GDP; and almost $650 million in reduced state revenue' already caused by the reduction of the public sector in regional NSW (Henderson 2018, p. 26).

Reductions in regional public sector jobs exacerbates the city versus regional divide and increase inequality. This is illustrated by statistics that show that in the five years to 2018 80% percent of new jobs in NSW were created in Sydney (Henderson 2018).

The proposed job cuts also have a gendered dimension. As women constituted some 63% of employees (TAFE NSW 2019) it is logical to assume that the proposed job cuts will impact disproportionally on job opportunities for rural and regional women, again impacting negatively on communities. Rural public sector jobs support farming families who rely on the stable income of jobs such as those of TAFE during droughts and commodity price slumps. This has again been exacerbated with the removal of the bushfire jobs guarantee and the recent floods and acknowledged by a regional Heads of Student Services recent comment recognising that 'staff and their friends and families that have been significantly impacted by the recent floods.'

We also note that the NSW Government has accepted the recommendations of the Gonski-Shergold review into vocational education and training (VET) (NSW Government 2021). This report seeks to address falling enrolments (188,943 in 2001 to 144,103 in 2016) by attracting more people to VET (Gonski-Shergold, 2021).

To reduce staff who facilitate enrolments at a time when the TAFE is planning to increase enrolments is short-term thinking and not good business practice as these are the people who can bring about these increased enrolments.

We remain concerned that TAFE management remains motivated by 'top-down savings targets and pre-determined timeframe's rather the needs of disadvantaged communities (particularly in regional NSW) as recently identified by the NSW Auditor General (p. 2).

It is impractical to be advocating, as this review does, the reduction of the staff who could bring this about.

This reflects and ongoing 'lack of clarity around TAFE NSW's primary purpose' and the ongoing reality that 'commercial objectives of the modernisation program conflicted with legislated social objectives' (NSW Auditor General 2020, p. 2).

In 2018, approximately 145,400 enrolments or one third of the total enrolments were students living in regional or remote areas. TAFE needs to take note of the situation of each community and its client base and establish a minimum location of two people at each location rather than 0.6 and ensure that face-to-face services are more seamlessly available during business hours.

The two reviews currently underway fail to appreciate the support that exists between the two branches. FM&L staffing reductions are not occurring in isolation from SSB. Staff work as functional units, but also work to the OneTAFE ethos of supporting each other in order to meet the needs of customers.

Security staff and General Assistants, for example, at remote and smaller locations have the local knowledge which keep campuses safer and often, by informal helping out, help to keep them open.

Reducing staff number at sites which are already remote puts staff and students at risk.

Regional staff know the needs of their diverse client base. For example, Aboriginal communities. TAFE's commitment to improve Aboriginal and Torres Strait Islander student enrolments and completions and reduce Gap targets will not be supported by removing local knowledge.

Please also note, the reduction in Student Enquiry officers at Belmont and Glendale campuses does not seem to have taken into account increased volume of work due to planned population expansion in geographical areas such as North Lake Macquarie where 5000 new residential households are being planned.

References

Gonski, D. & Shergold, P. *In the same sentence. Bringing higher and vocational education together.*
NSW Department of Premier and Cabinet https://education.nsw.gov.au/about-us/strategies-and-reports/our-reports-and-reviews/review-on-the-nsw-vocational-education-and-training-sector.%20%C2%A0

Henderson, Troy. (2018) *The Economic Importance of Public Services in Regional Communities in NSW.* Australian Institute. https://australiainstitute.org.au/report/the-economic-importance-of-public-services-in-regional-communities-in-nsw/

NSW Audit Office (2020) *One TAFE NSW modernisation program.* https://www.audit.nsw.gov.au/sites/default/files/documents/Final%20report%20-%20One%20TAFE%20NSW%20modernisation%20program.pdf

NSW Government (2018) *Technical and Further Education Commission Act 1990 No 118* https://www.legislation.nsw.gov.au/view/html/inforce/current/act-1990-118#sec.6

NSW Government. (2021) *World-class standard for Vocational Education and Training.* https://www.nsw.gov.au/media-releases/world-class-standard-for-vocational-education-and-training

NSW Treasury. (2019). *Guidelines for Community Service Obligations.* https://www.treasury.nsw.gov.au/sites/default/files/2019-01/TPP19-02%20Guidelines%20for%20Community%20Service%20Obligations.pdf

Pennington, A. (2020) *An Investment in Productivity and Inclusion.* Australia Institute. https://australiainstitute.org.au/report/an-investment-in-productivity-and-inclusion/

TAFE NSW. (2019) *TAFENSW Annual Report 2018-19.* https://www.tafensw.edu.au/documents/60140/0/TAFE+NSW+Annual+Report+2018-19.pdf/0ff7d3a9-83d6-a8ff-6cd2-b4c646e75e59?t=1574836633208

Superina, Nadia (2018) *Trading Up A reform package for a stronger TAFE NSW.* Mckell Institute. https://mckellinstitute.org.au/app/uploads/McKell_TAFE_SPREADS_WEBApril.pdf

Security Officers – Metro:

The CPSU NSW is greatly concerned in relation to the apparent plan to contract out the services of security officers within TAFENSW, especially in the Sydney metro colleges where 87 positions will be lost. The security officers within TAFE colleges are highly respected by both students, educational support staff. The security officers know their colleges and those who undertake study and teaching. Patrolling grounds and securing buildings across the campuses and providing the protection of the site and occupiers is an essential service to keep good order and the appropriate use of TAFE premises.

By not ensuring security services at the current standard that is provided currently, such as, first respondents to serious injury and the provision of occupational first aid, TAFENSW is potentially opening itself up to liability. Security officers within TAFE are in the majority the site warden in the case of bomb threat and fires for the purpose of evacuation.

The security officers in TAFE metro colleges secure campus buildings and equipment, ensuring all windows, doors and gates are locked, turning off all relevant electrical appliances and activating electronic security system when the campus is not in use. Maintain and monitor the campus electronic security system maintain campus key security system, issue keys to staff and record entries in key register and supervise car

parking on campus premises, ensuring correct parking of authorised vehicles. The General Assistants in regional campuses undertake the same duties.

The CPSU NSW would like to bring forward our ideas and hold specific discussions with TAFE about how to best maintain the current provision of security at metro campuses. Please advise.

FEEDBACK ON GRADING OF TEAM LEADER STUDENT ADMINISTRATION SERVICES (GENERIC) AND TEAM LEADER TWL6:

This grading is too low as evidenced in the proposed PD and how the position fits into the organisation chart and incorrect Capability Framework levels.

Nine of the 10 Key Accountabilities refer to some aspect of managing teams: people management, building team capability, allocation of duties, guide and supervise speciality teams. In fact, there are no other tasks outlined for this position. What other accountabilities will this role have other than managing the team?

Yet all of the Capabilities of People Management are "Foundational"

People Management	Manage and Develop People	Foundational
	Inspire Direction and Purpose	Foundational
	Optimise Business Outcomes	Foundational
	Manage Reform and Change	Foundational

This is a middle management position and moving to a "Customer Centric" structure, yet the Commitment to Customer Service capability level is only Adept.

This position will be providing information to TWL 4 on policies, procedures and compliance when processing Student Records, yet the Demonstrate Accountability capability level is only Adept.

These positions are managing a team of nine to 10 people based on the organisational chart: yet the PD refers to teams of five to 10.

This Generic PD provides no concrete reporting line structure i.e. Reporting Line is 'Assigned relevant Manager/Senior Manager'.

Revealed by the organisation chart, this position reports to a TML3. That is a huge gap – TWL6 to TM3.

It reveals that people in these positions will be undertaking higher level management. People in these positions will have no access to career progression within Student Services Group. Positions such as these in the current structure are either TWL8 reporting to TM1, 2 or 3, TWL6 reporting to TWL9 or TM1.

Appendix 1A: Student Services Branch Proposed Organisation Chart – Student Administration Services
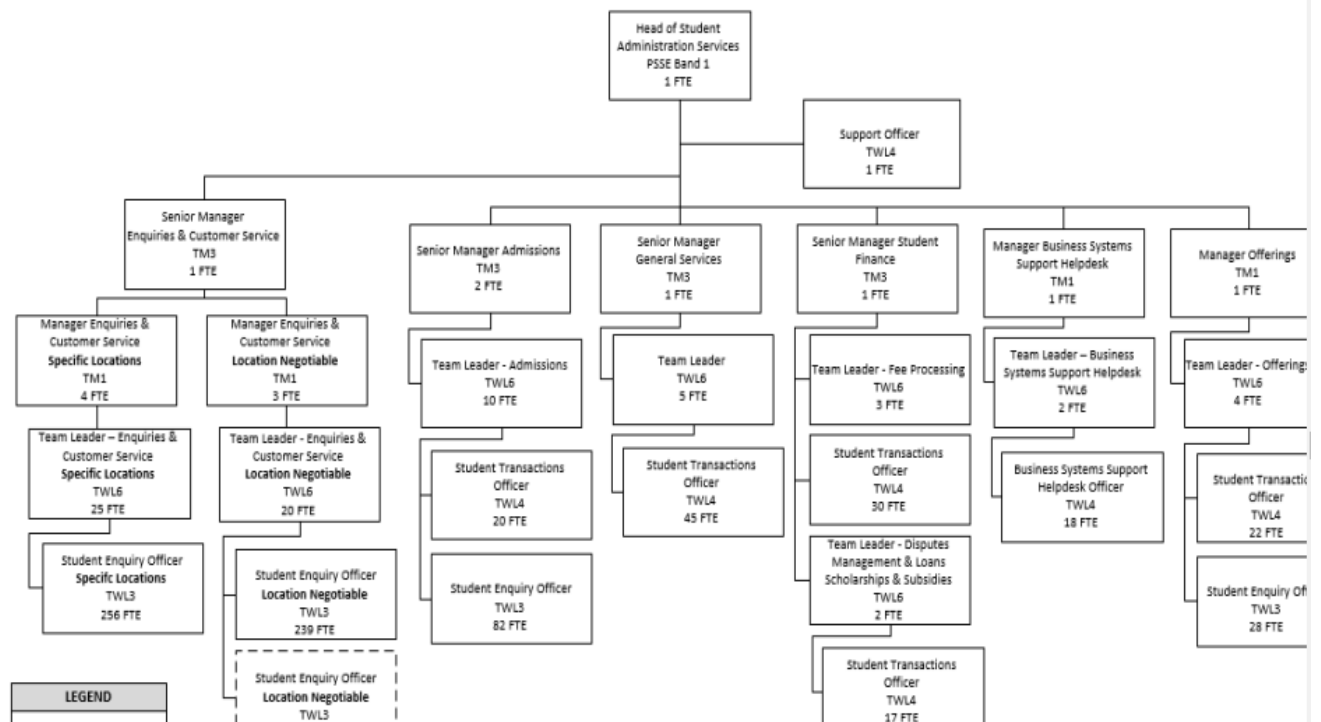
The Capabilities of the Proposed Team Leader Student Administration Services GenericTWL6 PD are considerably higher than the current Executive Assistant PD.

Proposed Team Leader Student Administration Services Generic TWL6 PD — 12 Intermediate and 2 Adept capabilities	Current Executive Assistant Systems Group TWL6 PD — 6 Intermediate and 2 Adept capabilities
Proposed Team Leader Student Sales Generic TWL6 PD — 13 Intermediate and 2 Adept capabilities	

CAPABILITY GROUP	NAME	LEVEL
Personal Attributes	Display Resilience & Courage	Intermediate
	Act with Integrity	Intermediate
	Manage Self	Intermediate
	Value Diversity and Inclusion	Intermediate
Relationships	Communicate Effectively	Intermediate
	Commit to Customer Service	Adept
	Work Collaboratively	Intermediate
	Influence and Negotiate	Intermediate
Results	Deliver Results	Intermediate
	Plan And Prioritise	Intermediate
	Think and Solve Problems	Intermediate
	Demonstrate Accountability	Adept
Business Enablers	Finance	Intermediate
	Technology	Intermediate
	Procurement and Contract Management	Foundational
	Project Management	Intermediate
People Management	Manage and Develop People	Foundational
	Inspire Direction and Purpose	Foundational
	Optimise Business Outcomes	Foundational
	Manage Reform and Change	Foundational

FACILITIES OFFICERS – QUESTIONS, COMMENTS:

Onsite Facilities Officers will be faced with the daily management tasks and they have no line reporting authority and at TWL4 are not renumerated for it.

There will be no onsite management of security staff at any site. In the proposed structure, Security has no direct reporting line to facilities staff onsite. There are only three Security coordinators for the whole state.

1. Who will direct Security officers when faced with rapidly changing and uncertain conditions during incidents and emergencies to prevent escalation of incidents?
2. Who will address their daily performance at each site?
3. The three proposed Security Coordinators cannot be across every campus state-wide. Currently, permanent security staff are an important and essential part of the customer-centric management of the campus – living the core value of putting the customer first. How will this be mitigated in a turnstile of high turnover contracted staff on minimum wage and training?

SSB – CONTINGENT LABOUR – FEEDBACK:

There are contracted staff (agency staff and/or contingent labour) within the organisation being provided with an opportunity to "act" in Team Leader positions for a period of time, due to staffing movements and staff on leave.

1. Why is TAFE NSW providing opportunity to "contracted staff (agency staff and/or contingent labour)" in the current state of change, over and above, permanent staff or temporary staff?

RECOMMENDATION

TAFE NSW review opportunities being provided to staff who are not permanent or temporary and look to provide these opportunities to TAFE NSW staff in the following order.

1) Permanent
2) Temporary, and in the event, staff are not available in the local area or "team" an EOI should be advertised to fill the vacancy

TAFE NSW have indicated permanent staff and temporary staff will be considered at Stage 3, of the recruitment process, but if staff are not being offered opportunity to grow and develop new skills, for the "future state" there is potential they will not be successful during the recruitment phase, due to lack of skills and experience.

SYDNEY REGION FACILITIES REVIEW:

The proposed structure for Sydney Region Facilities has been reviewed. Our review identifies that this structure is an attempt at a one-size-fits-all model to meet the needs of TAFE NSW assets without taking into account the vast range and diversity of TAFE NSW's asset base and FM operating in major metropolitan environment. The FM challenges of a regional campus with simple, low line buildings and enrolment of 500-1000 students and a small number of staff is very different to a large, multi-story, university-scale campus with a student population near or above 5000 and many hundreds of staff.

There has been no consideration of the complexity, scale of infrastructure, size of onsite populations, diversity of specialised delivery facilities and range of courses delivered in the Sydney Region. The newly announced Institutes of Applied Technology at Meadowbank will add an extra level of complexity and responsibility driven by the required standard expected of a university experience from the proposed North Region structure, we can see the expectation for such sites from the numbers that the university sector requires from the CHEC structure.

Sydney Region campuses complexities include numerous multi-story buildings and large onsite populations. The Sydney Region infrastructure's average age is 50 years plus compared to the TAFE's state average age of 30 years (from the roadshow presentation) and has the most heritage - and state significant buildings in TAFE NSW. The Sydney Region is 24% of the state, and enrolments are 32% of the state. These complex and ageing buildings occupied by large populations with higher utilisation result in substantial plant and equipment failures, maintenance and callouts. Therefore, decision-making is more frequent and complex.

The three largest buildings in the TAFE NSW asset portfolio, Ultimo Buildings D and W and Ryde Building A, are located in Sydney Region and are approximately 20,000m 2 each. The populations in these buildings are larger than many campuses across the state. Ultimo building W alone has 5,000 enrolments and 500 staff. Building A at Ryde is the

largest hospitality training facility in Australia, with 18 training kitchens. Ultimo is also a large hospitality centre with eight commercial kitchens. The Region has more lifts with more multi-story buildings – with eight and nine stories common at Ultimo. The Region has more buildings that are 100% reliant on HVAC for the internal environment of the buildings due to proximity to arterial road transport and aircraft flight paths.

Facility data comparison across TAFE NSW 2020 – see attached document.

Region	2020 One FM Requests	GFA	Approx Enrolments	Buildings over 4 storey	Number of Facilities Officers	Number of Facilities Coordinators	Addition staff*	Total TW staff
west	3876	207829	36,000	0	19	5		24
south	6112	250962	39,000	2	31	6		37
north	7559	329227	70,000	0	44	7	3	54
west sydney	9996	442351	85,000	2	38	7		45
sydney	10677	410887	100,000	15	40	8		48

*plus Ops Man TW9 + 2 x adminTW3 Chec

The following gaps have been identified:

1. This structure does not identify ownership or accountability for emergency management response at the site level. Both Facilities Co-ordinator and Facilities Officer PD's state '*actively participates in a range of emergency, safety and business continuity implementation activities'*. The future state roles and responsibilities functional activity map states CSR team '*Champions WHS where there is no FM&L'* - leaving no role with responsibility for emergency management onsite, and this represents a significant business risk and a WHS risk to students and staff.
2. No onsite management of security staff at large metropolitan sites with large populations. In the proposed structure, Security has no direct reporting line to facilities staff onsite. Who will direct Security officers when faced with rapidly changing and uncertain conditions during incidents and emergencies to prevent escalation of incidents? Who will address their daily performance at each site? The three Security Coordinators cannot be across every campus state-wide. Currently, permanent security staff are an important and essential part of the customer-centric management of the campus – living the core value of putting the customer first. How will this be mitigated in a turnstile of high turnover contracted staff on minimum wage and training?
3. There is no onsite role as a go-to person who can make decisions to ensure day-to-day business continuity with local decision-making ability. This proposed structure is a centralised decision-making model instead of the MD's commitment to move towards a more localised decision-making. In the proposed model, all incidents will be escalated to the TM3.
4. Classroom booking's function does not appear in SSB and FM&L structure. Will the teaching staff undertake this function?

5. Who will manage student behaviour outside of the classroom? e.g. a fight amongst students in the canteen. This concern is about student behaviour around the campus. Will the teaching staff undertake this function?
6. Lack of career progression- the gap between TW 6 and TM 3.
7. The current Sydney Region structure has three identified Aboriginal and Torres Strait Islander roles; this has been reduced in the proposed structure to one. Reconciliation Action Plan (RAP) recommends increasing the percentage of Aboriginal & Torres Strait Islander staff employed in our workforce from 1.8% to 3% of all Aboriginal non-executive roles in line with the NSW PSC Aboriginal Employment strategy.
8. Who will be the onsite contact to lead and coordinate the co-operation between campuses and the complex local environments? Ultimo is part of the Security for the wider precinct, the collaborative role with UTS and ABC, lockdowns and response to terror issues and the usual urban crime.
9. Who will manage events and short term facility agreement (STFA)? Sydney Region sites are very much in demand as third party use venues have a greater number of leaseholds which represent additional complexity of the role, managing day to day issues, organising STFAs and managing the events. Ultimo Campus processes 60 STFAs annually and have fourteen tenancies. A KPI is to grow revenues in 21/22 and 22/23. This target is at threat.
10. Who will be responsible for negotiating and managing major project delivery onsite, whether it is ARP, Minor Works, or Major Works. Manage shutdowns (planned and unplanned), relocations, set up of site works. On Sydney Region sites, this is very complex as they are the densest developed sites in TAFE NSW and also the most highly utilised.
11. Who will assist with the planning of Minor Works and Major Works and their delivery?
12. Currently campus staff, particularly section managers have a "go to" position on site as point of reference for a whole range of advice and support. The new structure does not have a role that will meet with this essential requirement.

Position Description (PD) changes

The feedback from this team is that the proposed structure for the Sydney Region has not adequately considered the scope, scale and complexity of the FM environment in the Region. As demonstrated in the graph and information above, the Sydney Region proposed FM structure can work but the Facilities Coordinator position requires an increase to the number of positions and at a higher grade to reflect the greater workload. Complexity of the work environment and therefore the level of decision making, and leadership and collaboration and problem-solving and negotiation that is required for FM to successfully respond to the core values of TAFE NSW, particularly to put the customer at the centre of our business. The Facilities Officer TW4 is a positive change.

In the position description of the TW6, the **Position Purpose** states: 'responsible for **coordinating** and **delivering** a diverse range of property and facilities services to a cluster of TAFE NSW sites through an in-house facilities team and a range of contracted services providers **ensuring a high standard of performance**, customer service, safety,

administration and compliance etc. this position purpose is not reflected in the accountabilities or capabilities.

To align with the **position purpose,** the focus capabilities need include the following:
- Plan and Prioritise - **ADEPT**
- Thinking and Problem Solving - **ADEPT**
- Working collaboratively - **INTERMEDIATE**
- Manage and Develop People- **INTERMEDIATE**

Proposed changes:

- 12 X TW8, including the Eora Aboriginal and Torres Strait Islander identified position, which should have been included in the proposed structure to replace the 8 x TW 6 positions.

We strongly believe that upgrading the Facilities Coordinator positions to a TW8 and increasing the number to 12 will enable Sydney Region to maintain and respond to the business's ever-changing needs. To enable greater accountability, creating a flexible and agile workforce that provides stability to the team. Furthermore, it will give more support to the TM3 by avoiding issues being escalated and allow that position to undertake its primary duties.

The potential impact of not taking actions on feedback could result in risk to business continuity, physical infrastructure and safety and well-being of our students, staff and wider community which could cause reputational damage to TAFE NSW.

Please contact CPSU NSW Industrial Officer Matthew Drake-Brockman at mdrake-brockman@psa.asn.au in relation to this matter.

Yours sincerely,

Matthew Drake-Brockman
For **Stewart Little**
STATE BRANCH SECRETARY