



**Australian Services Union
Taxation Officers' Branch**

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Mr. Graham Perrett MP
Committee Chair
Parliamentary Standing Committee on Public Works
PO Box 6021
Parliament House
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Email: pwc@aph.gov.au
16 September 2022

Dear Chair Perrett

Proposed Fit-out of New Leased Premises at 6 Parramatta Square

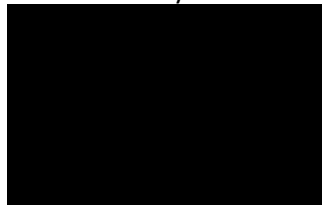
The Australian Services Union has concerns about the ATO's proposal for the fit-out of its new Parramatta office. The ASU has significant membership in the current Parramatta office and this submission raises their concerns for the consideration of this Committee.

The former Government endorsed the lease on this building on 11 March 2022, just before the caretaker period commenced in April. We ask that the Committee reflect on the adequacy of the lease, particularly in terms of the space that has been taken, in addition to the matters we raise below.

The ATO states in its submission to the Committee that it expects the fit out to cost \$64,375, 869 (excluding GST), funded from the existing ATO budget (1.4.2). This is an extra-ordinarily precise estimate. It suggests the ATO has full details about the matters we raise below, but it has chosen not to share this information with the ASU or its Parramatta staff.

We therefore ask that the Committee delay endorsing the ATO's proposal until the ATO has consulted with the ASU and the Parramatta staff about the matters we raise below. We propose that the Committee then give us permission to make a further submission to the Committee to advise whether our concerns have been adequately addressed. The Committee could ask us any questions it may have with that response. We ask that the Committee then determine its response to the ATO's application for approval.

Yours sincerely



Jeff Lapidos
Branch Secretary
ASU Taxation Officers' Branch

Matters of concern

ATO consultation with staff and their Unions has been inadequate

The ATO Enterprise Agreement 2017 covers accommodation at clause 87. It states the ATO's commitment to provide high quality office accommodation that meets the professional needs of its employees and the nature of their work. The ASU does not accept this commitment is apparent from the ATO's submission to the Committee or its failure to consult.

Clause 87.3 guarantees that the ATO will consult with affected employees and their Unions when a decision has been made to obtain new accommodation. This is meant to occur before decisions are made. This has not occurred.

Consultation under clause 7 is required to be undertaken before the ATO makes decisions of this nature. The ATO is required to invite the employees and their Unions to provide their views on the impact of such change on the staff. The ATO must then give prompt and genuine consideration to the matters raised. This has not occurred. We ask that the Committee delay giving its approval until the ATO has complied with its consultation obligations.

Reduction in total space

The design allows only 12 m² of usable space per employee compared with the Government's target of 14m² (1.33). The ATO provides no rationale for this reduction. Why are the staff being crammed into this building when Government guidelines allow more space per person? The ASU believes the ATO should provide its staff with accommodation in line with Government guidelines. There should be additional spaces made available for the staff.

Prayer Room

There needs to be a dedicated Prayer Room. There are significant numbers of employees of the Muslim and Christian faiths at Parramatta who wish to pray on a daily basis. The former expects access to a prayer room on multiple times each day. Other faiths may also need such access. We have no details about the size or facilities in such a room.

Lunch and break out facilities

The ATO submission at 5.1.6 states there will be only 6 break out/kitchen areas across the seven floors of the building. We have no information from the ATO about the size or the content of the kitchen areas and whether there are any separate break out areas as such. If all 1,400 work stations are located on the upper six floors, then there will be some 233 work stations on each floor. The lunch area on each floor needs to accommodate all these people. The ATO needs to allow for inclement weather when almost everyone will want to utilize the lunch room. How many people can each lunch room comfortably accommodate? We have no information on this.

The ASU is aware that the ATO's Gosford office has an inadequate number of refrigerators at the lunch rooms there. There are similar issues there with other facilities staff expect in a modern lunch room, like microwave ovens, toasters and the like. We have no assurances from the ATO about the nature of the facilities it will make available to its staff. Keep in mind that the ATO does not make coffee, tea or milk or even cups, crockery or cutlery available to its staff. So everyone has to make provision for their own and they need refrigeration and storage facilities made available for this purpose.

Toilet facilities

We have no information about the number of cubicles on each floor for females or cubicles and urinals for males. The ASU does not accept that keeping to the absolute minimum standard is appropriate for tax officers. The ASU does not want to see queues for the bathroom.

‘Squat’ toilets

The ATO should provide additional ‘squat’ toilets on each floor to accommodate the different cultural backgrounds of the staff. The ASU is aware that ATO staff in some ATO offices have had difficulty using ‘standard’ toilets and have attempted to use these in the squat position, which has caused difficulties. The ASU does not want to find out that staff from different cultures are having difficulty using the bathroom facilities.

Disability bathrooms

Some people are unable to open the doors to these bathrooms. Each such bathroom door needs to be able to be opened and closed from each side by touching a button located at an appropriate height. The ATO advised the ASU that this will only be done on a case-by-case basis. The ASU raised this issue about the current Parramatta office. It took months and months for a solution to be arranged. We say that our proposed solution should be made available prior to occupation of the building for each disability bathroom.

First Aid Rooms

The ATO has advised the ASU that there will be only one First Aid Room in the building. We do not know where it will be located. We have no details of the size of the room, the number of beds, the facilities for refrigeration, and the provision of bathroom sinks. We have been told the First Aid Room will not contain a toilet. First Aid Officers have advised the ASU they consider a toilet to be an essential part of a First Aid Room for what they consider to be obvious reasons. We do not know how easily an employee will be able to be moved from the First Aid Room to an ambulance.

Hot desking

The ATO intends to use hot desking across this building. There has been no survey of the staff to assess their support for this approach. The ASU is aware there are serious misgivings amongst staff about being forced to use hot desking. Under the ATO’s plan, no one will have their own desk, other than the SES based at this office. Staff will be expected to stuff their belongings in a small locker. They will have to find a desk and a locker each day, first in best dressed. Some people are very territorial and expect to use the same desk and locker each day. This can lead to disagreement if someone else claims that desk or locker first. It can be a stressful start to the day. This is not the best way for the ATO to demonstrate support for its tax collectors.

The ATO has not provided the ASU or ATO staff with any details of its proposed hotdesking arrangement. We are not in a position to assess the suitability of hot desking for the nature of the work that is undertaken at the Parramatta office or for the professional needs of the staff. The work at the Parramatta office covers the range from Public Groups & International, Private Wealth and Integrated Compliance through to Client Account Services and Lodge & Pay, as well as administrative and policy work. The work undertaken at Parramatta deals with the most complex legislation any APS Agency administers through to difficult conversations that front line staff have with taxpayers in difficult financial and personal circumstances. Hot desking takes an open plan environment to an extreme. We are concerned about noise levels and the ability of staff to concentrate on their work and to focus on their conversations with members of the public. Consideration ought to be given to whether a more tailored approach should be taken to the use of hot desking or otherwise.

Lockers: The ATO has provided no information about the size or the location of the lockers it proposes to use. Our view is that the lockers used at the Gosford office are inadequate in terms of their size and location.

Bicycle racks, showers and lockers to encourage walking, running and cycling (5.4.7)

The ATO has provided no information about the number or type of these facilities for the staff to be able to assess their adequacy.