



**Australian Services Union
Taxation Officers Branch
116 Queensberry Street
Carlton South 3053**



Branch Secretary: Jeff Lavidos



Hon Dr John McVeigh MP
The Chair
Parliamentary Standing Committee on Public Works
Parliament of Australia
29 November 2018

Dear Dr McVeigh

I have provided the Committee in attachments the ASU's submission in response to the ATO's proposal for its Moonee Ponds office. The submission and its attachments are not confidential.

Please let me know I can assist the Committee in its deliberations on this issue.

Yours sincerely



Jeff Lavidos



ASU response to the ATO Proposed Fit-out of Leased Premises in Moonee Ponds, Victoria

Executive Summary

The Australian Services Union Taxation Officers' Branch exclusively represents employees of the Australian Taxation Office.

The ATO's proposal should not be supported because it does not deliver an outcome that is fit for purpose and is not good value for money.

We ask the Committee to withhold approval of the ATO's proposal to make the expenditure of some \$35 million dollars on its leasehold over the Moonee Ponds building, and instead recommend alterations to the ATO's proposals that are consistent with this submission.

We recommend that the ATO resume negotiations with the landlord with a view to negotiating a lease over additional of floors at Moonee Ponds so it will no longer necessary to incur large expenditures for,

- a new lift,
- the creation of a new stairwell between the Ground, First, Second and Third Floors, or
- moving and expanding the kitchen and bathroom facilities.

The purpose of the additional floor space would be to allow larger work stations (desks), particularly for compliance and legal work, ensure work points are spaced to minimise noise levels and allow suitable storage at and near work points.

The ASU accepts that phone and processing work can be undertaken with desks that are smaller than needed for compliance and legal work. However, there is an advantage for the ATO in having similar desks throughout a building. It allows the ATO to move staff with a building in response to changing work demands.

The savings from having small work stations offsets the flexibility available to the Office from having the similarly sized desks throughout a site. The ATO has found the 'snowflake' desks it uses at various sites has been economical and appropriate for a full range of work types. These should be the standard used at Moonee Ponds.

Section 1 – concerns about the ATO presentation

ATO submission of October 2018 uses superseded concept drawings

The concept drawings attached to the ATO submission to the Committee of October 2018 have been superseded. We understand this is because the ATO discovered several ‘errors’ in these drawings. The ASU submission is based on what we understand to be the latest concept drawings. See Attachments 1, 2, 3 & 4.

The ATO submission on NABERS Rating does not tell the full story

The ATO’s October 2018 submission at 3.7.1 promises that the renovated building will deliver a NABERS rating of at least 4.5 stars. The Moonee Ponds building has a whole of building NABERS rating of 5 stars at 30 September 2018. * The ATO proposal ought to have a NABERS rating of at least 5 stars.

* Source: ATO National Consultative Forum 13 November 2018 papers. “NABERS ratings by site”. See Attachment 5.

The ATO proposal will have a negative impact on local parking

The ATO’s proposal will have a significant detrimental impact on the availability of public car parking space in the vicinity of the building, contrary to section 2.7.1 of the ATO October submission that its proposal will have no significant impact on the local community.

There is a multi-storey car park immediately adjacent to the Moonee Ponds office which is filled to capacity by around 9.00am each week day. ATO employees use a large proportion of this parking. ATO employees are also heavy users of all and part day public car parking in the surrounding areas. Public car parking in the area is scarce because of high demand.

The table below sets out the current number of work points at Moonee Ponds on Ground through to the Third Floor, a total of 14,000 m². The same ratio on the remaining 7,000 m² would accommodate at least another 600 workers.

Floor	Current Fitout Wk-Pt #	Concept Drwg Wk-Pt #	# Increase	% Increase
Ground	161	214	53	33%
Level One	270	347	77	29%
Level Two	295	337	42	14%
Level Three	235	321	86	37%
Total	961	1219	258	

The ATO proposal will result in the landlord leasing the top three floors of the building to another tenant(s) which could accommodate another 600 workers. A significant proportion of these workers will seek regular access to already heavily used public parking spaces.

Section 2 - The ASU disagrees about the need for this fit out

Work point vacancy rate at Moonee Ponds is not the issue suggested by the ATO

The ATO states at 2.1.3 of its October 2018 submission that it “requires a reduced Net Lettable Area of 14,000 square metres due to a 19.12% vacancy rate ...”

In fact, the vacancy rate at the Moonee Ponds site was 16.53% at the end of September 2018. The vacancy rates in the ATO’s Victorian premises at 30 September 2018 are set out below.

Vacant ATO Work Points in Victoria (as at 30 September 2018)*

Site name	Total Works Points	Total Vacant Works Points	Percentage Vacant
Box Hill	1,326	130	9.80
Dandenong	838	79	9.43
Geelong	202	30	14.85
Melbourne	2588	229	8.85
Moonee Ponds	1434	237	16.53

*Source: ATO National Consultative Forum 13 November 2018 papers.

See Attachment 6 – Vacant work points by site at 30 September 2018.

We ask the Committee to assess the ATO’s current work point vacancy rates against the work the ATO has undertaken in reducing the rate from 24.7% in November 2014 to 12.09% at 30 September 2018. See Attachments 7 – Vacant work points at November 2014 from ATO National Consultative Forum papers of 11 December 2014.

The ATO needs a 10% work point vacancy rate to manage its accommodation needs

The ATO needs a vacant rate of around 10% to help it manage its staffing needs. The ATO is a dynamic organisation that needs to regularly change how it organises its functions and team structures. The vacant work points at ATO sites are scattered around each building. Unless the ATO undertakes a re-stack, its business lines have to play a game of musical chairs as staff come and go because these movements usually do not match the location of vacant work points.

The Melbourne office had difficulty in the last year or so finding desks in suitable locations for new employees recruited in its Graduate Program. The ATO business line ‘Public Groups & International’ had this difficulty at the Melbourne and Brisbane sites. Both these sites have low work point vacancy rates. The ATO recently had to undertake a re-stack at its Docklands, Melbourne site to fit in new teams.

The Committee should not take the number of ‘excess desks’ at Moonee Ponds as sufficient reason for the ATO’s proposal.

The ATO’s proposed fit out is not fit for purpose

We know the ATO intends the Moonee Ponds fit out will be based on its experience with Level 8 of its Docklands, Melbourne and its Gosford, NSW buildings because of its reference to certain code words in its October 2018 submission, such as the following.

- “... the continual evolution of work practices.” [1.2.1]
- “modern, flexible and cost effective accommodation” [1.2.2]
- “supports more agile, flexible and innovative work practices.” [1.3.1]
- “providing more agile, flexible and innovative work spaces.” [2.1.4]
- “accommodation that is contemporary and supports organisational agility and performance” [2.3.2]
- “supports organisational agility and flexibility” [3.1.1]
- “reduced footprint reflecting change of business functions and future ATO accommodation requirements” [3.1.1]
- “Implement more collaborative work practices, uniformity and more efficient use of the workspace” [3.1.1]

These code words, in conjunction with the latest concept plans, are similar to the words that the ATO used when it described its approach to hot desking at Level 8 at Docklands and its new building at Gosford. They are a clear indicator of the ATO’s intention to use hot desking at the new Moonee Ponds office.

The concept plans confirm the ATO’s intention to use hot desking at Moonee Ponds because of the provision that is made for ‘lockers’ on each floor. The ATO only uses ‘lockers’ at sites where it uses hot desking.

The Level 3 concept plan provided with this submission has provision for a number of rows of lockers. See 3 to 4 C between the Utility/Storage (pink) and Quiet (yellow) rooms and the Telepresence (green) and Store (grey) rooms, at 6 to 7 B, adjacent to the stairwell and Comms room, at 6 – 7 F to G by the Comms and potential compactus, and 2 – 4 F to G adjacent to and above the voids. See Attachment 4.

Fit out density is excessive

The proposed fit out density in the ATO proposal for its Moonee Ponds office crams too many work stations into the ATO component of the building. The Moonee Ponds fit out density is 11.6 compared with the 12.9 proposed for the new ATO building at Townsville.

Comparison of fit-out and occupational densities at Moonee Ponds v new Townsville*

	Moonee Ponds	Townsville
Fit-out density (current)	14.6	14.3
Fit-out density (proposed)	11.6	12.9
Occupational density (estimated current)	18.8	18.2
Occupational density (proposed)	14	14

* Source: Email from ATO Assistant Commissioner Andrew Closey sent to ASU Tax on 3 September 2018 at 4.42pm in Attachment 8.

Attachment 8 includes a useful discussion of the meaning of fit out and occupational density.

The fit out density proposed for Moonee Ponds results in desks being too small and too close together. We comment on the impact of this below.

Occupational density increases when regard is had to casual and non-ongoing employees

The ATO's employment of non-ongoing and intermittent or casual employees would increase the occupational densities from those in the table above.

There were 1053 ongoing employees at Moonee Ponds at the end of September 2018. 894 or 84.9% were full time and 159 or 15.1% were part time. The ATO also employed at that date 47 non-ongoing employees and 152 casual employees. The number of non-ongoing and casual employees can vary considerably over a year. The number of casuals will generally peak over tax time, approximately from June to November each year.

It is often the case that these employees are not assigned their own desk. Instead they will use a desk that is occupied by an ongoing employee during the day. Often casual and some non-ongoing employees work a late shift that commences at 4.00 or 5.00 pm.

Proposal does not meet the professional needs of staff

The ASU is concerned that the ATO decided to reduce its net lettable area at Moonee Ponds from 21,000 to 14,000 square metres without taking into account the nature of the work that is undertaken or the professional needs of the staff. These two tests are requirements of clause 87.1 of the ATO Enterprise Agreement 2017 which states,

The ATO is committed to providing high quality office accommodation that meets the professional needs of employees and the nature of the employees' work.

These issues are discussed below.

Desks are too small – Lockers too far away and inadequate

The concept drawings for Moonee Ponds are similar to the approach used at its hot desking sites at Gosford and Level 8 at Docklands, Melbourne. The desks at these offices are far smaller than those currently used at other ATO sites. The desks do not have drawers and do not have filing or other cabinetry by them, as is the case at all other ATO sites. Instead Gosford and Level 8 have 'personal' and 'team' lockers well away from the desk areas. The 'personal' lockers are small, like those used by students at secondary schools. See Attachment 9 for a view of a personal locker and at Attachment 10 for a view of a bank of personal lockers. The 'team lockers' have a similar width and depth to the personal lockers, but have the height of around 2 or 3 personal lockers.

The ATO expects staff at its hot desking sites to keep their working papers, paper files, keyboard, mouse and often, their lap top computer in their personal locker overnight as well as any personal effects such as any pictures of loved ones, mementos, cups, glasses and plates, cutlery, tea and coffee, footwear, clothing, bags etc.

Collaborative work spaces should be in meeting rooms not open spaces

The ATO says it is important to have collaborative work spaces. We agree in principle. The Gosford and Docklands Level 8 utilise special work stations in open plan areas in an attempt to demonstrate that it does not need as many meeting rooms for collaborative work. Collaboration in open spaces can lead to very noisy work environments. As one Moonee Ponds employee stated to the ASU,

The collaborative spaces should be like meeting rooms and be closed off, so those using the space aren't distracting those who sit near it.

Work points should not be adjacent to windows

The concept drawing show several work points on each floor are located against windows. See a row of such work points in Attachment 2, at G, 1. There is concern this will create health and safety issues with glare. One OH&S specialist from Moonee Ponds told the ASU,

The glare from the outside sun can cause issues with people's eyes trying to focus on the screen and having a brighter light in the background. It can cause eye issues if it's done over a long period of time.

Staffing by Business line at Moonee Ponds at September 2018#

Business line	Headcount (Full and part-time)
ATO Corporate	9
ATO Finance	18*
ATO People	43
Business Reporting & Registration	21
Client Account Services	202
CEG Strategy & Performance	25
Debt	60
Enterprise Culture, Change & Innovation	3
Enterprise Strategy & Design	1
Enterprise Solutions & Technology	13
Intermediaries & Lodgment	18*
Individuals	8
Indirect Tax	70
Policy, Analysis & Legislation	4
Private Groups & High Wealth Individuals	176
Public Groups & Internationals	101
Review & Dispute Resolution	46
Strategy and Support (Service Delivery)	21
Smarter Data Program	23
Small Business	68
Superannuation	116
Tax Counsel Network	4
Tax Practitioners Board	3

Attachment 11: ATO National Consultative Forum papers for 13 November 2018

* Includes Deputy Commissioner and her office

Moonee Ponds is a major centre for phone and processing work, and also for compliance and legal work with a variety of other functions. The table above sets out the number of staff in each of the ATO's business and service lines at Moonee Ponds at 30 September 2018. The classification of the work at Moonee Ponds varies from the lowest APS levels up to SES band 2, of whom there are two. The proposal provides for the SES officers to have exclusive occupation of their own office. The business lines are a pointer to their work type.

The Work undertaken at the Moonee Ponds office is not suited to the proposal

The Moonee Ponds office has large numbers of employees engaged in complex compliance and legal work which is not suited to the layout and desk types specified in the concept drawings. There are different issues for staff working in phone contact and processing areas because they have lesser need for working papers and paper files. The concept plans have desks which are too close together. This creates issues with noise, privacy and difficulties arranging reasonable adjustment for those with disabilities.

Section 4 – The fit out that is needed

Compliance and legal work need larger desks and facilities by their desk

'Public Groups & International' and 'Private Groups and High Wealth Individuals' Individuals conduct the most complex compliance work. The next most complex compliance work is undertaken by 'Small Business', 'Indirect Tax' and 'Superannuation'. Personal Tax compliance work can involve a lot of paper files because individuals are less likely than business to use digital records.

The 'Tax Counsel Network' undertakes the most complex legal work. The legal work of the 'Review & Dispute Resolution' business line deals with objections and appeals which can vary from fairly basic to the most complex work.

The current proposal involves hotdesking of small desks, with no drawers at a desk and all storage facilities well away from the desks. The hot desking environment is not conducive to teams working together because no one is guaranteed a seat. It is first in, first choice.

All the employees in the above lines need full size work stations of their own, that allow them to undertake paper based work in conjunction with digitally based work. Their desks need drawers. They need filing cabinets and lockable cabinets at or adjacent to them for short and medium term storage or for their working papers. The ATO provides a working environment like this at all its sites, other than the two hot desking sites.

The proposed fit out does not suit work in Client Account Services and Debt

The proposed fit out has desks too close together for the work of these business lines so the working environment will be far too noisy. Excessive noise levels make it difficult for staff to concentrate. The use of hot desking creates separate issues.

The ATO's Service Delivery Group has two large business lines at Moonee Ponds, Client Account Services (CAS) and Debt. Work in CAS generally involves incoming and outgoing telephone contact as well as processing work. CAS is cross training its staff so they have the skills to both phone and processing work.

ATO IT systems are being enhanced so the ATO expects that next calendar year staff will be able to switch between phone and processing work quickly in response to changes in queue wait times. Noisy work environments can make it difficult to hear 'clients' and privacy issues can arise.

Work in Debt can involve both incoming and outgoing calls, negotiating payment arrangements and creating and reviewing legal documents. There can also be intense checking of whether debit and credits have been properly accounted for, including whether General Interest Charges and penalties have been correctly calculated and remitted (reconciliation work). Distractions by unwanted noise can distract and ruin concentration and make it difficult to hear clients.

The Brickfields report on Trial 2 of the ATO Future Workspace* at Level 8 at Docklands, Melbourne commented on staff concern about noise levels,

In Trial 1, there is a much higher proportion of FWS (Future Workspace) participants seeking out a quiet place to work in the FWS than in the previous survey (81% vs 47%). In Trial 2, this appears to have been more challenging for participants. This could be due to increased ratio and larger percentage of staff leaving desks 'temporarily unoccupied' which limited access by some staff.

* Attachment 12 - ATO Future Workspace, Trial 2 – Post Occupancy Evaluation. Key Outcomes and Directions Moving Forward, November 2017, p. 21.

CAS staff undertaking phone work at Level 8 of Docklands in the second trial were densely packed into an area called the 'Forest'. It was incredibly noisy when I inspected this space in 2017. Brickfields found that staff felt the noise challenging; late starters had less choice of work stations; there were difficulties accessing work stations adjusted to their needs; and insufficient time was allowed for staff to move their equipment and personal belongings between lockers for individuals and setting up their work station. Attachment 12, p. 27.

Call Centre staff in the Future Workspace Trial 2 frequently commented to the Brickfields Evaluation about the inadequate size of personal lockers, that the lockers were located too far away from their desk, that they sit at the same desk all day and therefore there is no need to hot desk, the crowding of desks in the 'Forest' made it far too noisy, there was a need for more privacy. Another issue was concern about health issues because desks were located too closely together; and when desks are not dedicated to specific people there is the problem that some people are 'grotty' and others are very fastidious with the cleanliness of their desk. See Attachment 12: comments from CS&S Teams 2, 3 & 5, pp. 74, 75 & 76.

One of the problems with hot desking at the Gosford site is that while the Office makes cleaning materials available, many find it is not suitable and they buy their own. The telephony areas at Gosford utilise hot desking. When I last inspected the area on 24 October 2018, the telephony areas were staffed at around 30% of capacity and so noise levels at that time were not excessive.

Section 5 - Proposal for building and fit out that is fit for purpose and is value for money

The ASU recommends that the ATO approach the landlord with a view to taking a lease on the balance of the building, that is floors 4, 5 and 6, an additional 7,000 square metres.

The ASU understands the market rate for office space in North West Melbourne is around \$400 per square metre, net of GST. If the ATO can lease the additional three floors at Moonee Ponds at this rate, it would cost an extra \$2,800,000 per annum, net of GST. If the ATO leases the whole building it would not need the additional lift, the new stairwell and it would not need to move and extend the bathroom and kitchen facilities.

Under this amended proposal, all the ATO would be required to do would be to upgrade the building and facilities generally and fund a new fit out. The new fit out could be done gradually, without the need to meet the February 2020 deadline, as is now the case.

The proposed reduction in capital works is likely to save around \$21m, net of GST. A saving of this magnitude can be achieved because the cost of the additional lift, new stairwell and movement and expansion of wet areas are extremely expensive works. This saving would significantly offset the additional cost of leasing the top three floors.

We estimate this amended proposal for public work would cost \$14m net of GST. This proposal would deliver an upgraded building with a fit out that suits the needs of the ATO's work and its workforce, and in doing so present good value for the money invested.

Alternative proposal: The ASU accepts that because we do not have access to the ATO's detailed costings, the savings and costs estimated above will not be accurate. We therefore propose that consideration be also given to the ATO leasing an additional two floors, Levels 4 and 5. The ATO should be able to manage the redevelopment without the need for an additional lift, new stairwell or need to move and expand bathroom and kitchen facilities. The upgrade of the building should ensure that the current problems with the bathrooms are remedied and we should be able to manage staffing within building standards. Importantly, this alternative proposal would enable a building fit out that is fit for purpose and good value.

Section 6 - Moonee Ponds ATO staff have their say

The ASU provided staff at the Moonee Ponds office with a copy of the ATO submission to the Public Works Committee and a copy of the latest concept drawings provided with this submission. The staff had not seen these documents before. We invited their comments. The following is a representative selection of their comments.

The desk layout as shown in the document will provide no privacy, especially when making and taking calls from tax agents and tax payers. The work in my area is of a confidential (sensitive) nature, as are the discussions we have with taxpayers/tax agents. Theoretically, the person sitting next to you or across the table from you may not be part of your team or even your business line, and therefore the discussions you have with the client can be overheard by people who do not have a "need to know". They will be sitting so close to you,

that they will also be able to view your computer screens while you are accessing and working with sensitive taxpayer information.

So how am I expected to work with someone right on top of me. – I have OCD which the ATO are aware of and hired me with. I have enough trouble now keeping people away from my desk and don't touch – are they prepared to have me off on sick leave with stress and anxiety as people invade my required space??????

The desks are not ideal, far too small and no storage space will not work in my area (PGH)

I personally don't like the idea of lockers. I'm assuming the lockers will mean that we would be hot desking and having to pack our things up each day, which is unproductive.

We spend a large portion of our time at work, so it should be a comfortable environment where we can have our own personal space with our personal belongings on our desk i.e. family photos. Surely staff can have one drawer/ locker at each desk and an assigned desk so teams can sit together.

The chance that your team members will be sitting around you, or even near you, will probably be very slim. The suggested layout may cause the fragmentation of the team environment and it will be difficult to maintain team cohesion. Firstly, it may be difficult for the team leader/director to monitor their staff, as they may not be sitting in the same area or floor. This may be a problem if the team leader/director has 'problem' staff who need to be monitored. Training of new staff and the graduates on rotation will also become more difficult. Secondly, our team works collaboratively on our cases (in order to resolve issues, form strategies, discuss the application of legislation, etc), with ad hoc discussions constantly occurring in order to resolve issues. With the fragmentation of the team, this will not be occurring. Every time we need to discuss anything case related, no matter how minor, we will need to book a meeting room. What if all the meeting rooms have been pre-booked, what do we do then?

Some of my colleagues have commented on the sanitary aspect of having to share desks. Some people are fastidiously clean, while other may have a laissez faire attitude to keeping a clean desk. Will we need to wipe down and clean the desk we use in the morning and at the end of the day? (More down time?).

Such close proximity of staff is going to increase the rise of infections and therefore increase unplanned leave. If I am made to go to a new desk each day, I will be making sure that I am cleaning it for my own safety and peace of mind. I have my own cleaner but if people will be using the ATO stores issued cleaner there could be problems as that stuff gives some people (me included) headaches.

I have a concern about security. Currently I have RAC access (restricted access). In the past I have accessed the tax accounts of an ex-Prime Minister, ex Governor-General and multiple high profile sporting identities. In the last year I have had to access the accounts of staff. As a RAC officer I am supposed to do all I can to keep the information confidential and it is only to be shared with staff who have an equal or higher security clearance. From the plans it looks like we are sitting at long kindergarten craft tables with little privacy.

Will I be in breach of my duties as a RAC officer if some unknown staff member sees my screen and sees that I may be in a staff member's account – possibly someone they know? I don't think the ATO would be able to penalise me for breaching my duties as a RAC officer if they have not supplied me with a working environment that allows me to carry out my higher security duties and safeguard the information. Would Chris Jordan be happy for his account to be in view?

I utilise both physical and electronic versions of the legislation when working – preferring the physical version when doing more intense reading. I'd have to bring the 3 volumes from locker to desk daily. There are many resources which people use that are only provided in printed format – which are kept close at hand on our desk or in filing cabinets. These docs would, I assume, be stored in our lockers away from our desks as well.

I think cramming more people on the floors is going to make the place quite noisy and hard to focus for some people. If desks aren't assigned to teams, logistically it'll be a nightmare each morning trying to find a space to sit, which might not be anywhere near the people you work with (I've heard of this issue at Docklands)

In my audit work, I frequently have to lay things out, documents etc, and I need a reasonable amount of room. There is also the germs issue of reusing the desk of the last person. I also need two screens and a height adjustable desk for my old back.

The vast majority of the people on the 5th and 6th floor are technical/audit staff from PGH and PGI. These staff need to have a larger desk to complete this work. It is unreasonable to expect them to do this work on a small desk with no storage. Again, the demand for quiet rooms and meeting rooms would increase significantly and from what I see the allocated spaces have decreased. How does anyone mentor junior staff when you will be unable to sit together? The issues are endless and that is just off the top of my head.

The tiny desks are not conducive to my audit work in PGH; where we frequently need 2-3 folders open, easily accessible nearby, when undertaking work on an audit.

The tiny workstations appear completely inadequate for compliance case work and will create substantial OHS issues as well as taxpayer and personal staff privacy issues. The storage allowed is not commensurate with our requirements and the distance of the storage from the workstations will result in efficiency losses.

Our current workstations and storage space are adequate. A reduction in both of this magnitude will severely and adversely impact upon our productivity and staff morale.

The workstations are too cramped, and I believe it would not only be an OHS issue but as a fire warden, I can see the difficulties that will arise in trying to gather so many people and squeeze into the stairs that small.

This is my view on the proposed layout, especially the desk where people sit in a row.

Being in an Audit area, we receive a lot of client documents and statements in hard copy. Majority of the time it is more efficient and productive to use paper. The layout of the tables will probably make it difficult to work and most likely affect neighbouring staff. There is lack of privacy for our work and may cause issues when dealing with sensitive information.

The lack of storage next to the desk will cause inconvenience for “transport” of documents daily. This will also increase the risk of misplacing sensitive documents or even losing them.

The concept drawings indicate a layout that is not conducive to a professional working area and the lack of drawers or cabinets in close proximity is a hindrance. Obviously whilst we would still be able to complete our work, it will certainly be more of an inconvenience and another unwanted distraction considering the pressures of our work. It would take additional time to set up our workstation each morning and conversely to pack up each night.

The tiny desks, close together with no draws or cabinets is a big downfall. Staff members should be able to have unclassified items on their desk (i.e. work processes, legislation, case law) and should feel safe knowing that they will be able to have a desk when they arrive. Staff members who start work later in the morning (e.g. 930am) wouldn't be guaranteed that they would be able to secure a desk (given that visiting staff would be able to secure desks if they arrive before other staff). Also, staff will spend more time setting up and packing up every day. From a convenience point of view, staff want to be able to store stationary, tea, coffee and small items on their desk without having to move things every day. It seems like it would mean staff spend more time (taxpayer funded time) setting up and packing up. The desks we currently have are good for enabling staff to have meetings with team leader/audit leader/director/SES without having to arrange a meeting room (which are hot property in MPO). Also, the layouts of the desks (particularly the 7 seats-per-

table) raise a risk of privacy, when the staff member next to you may be from a different area, BSL, Office etc. and may be able to view your information. (Indirect Tax)

I have to note that the seating appears profoundly unfair. A few people will be allocated good desks (like at the end of a Y configuration). Some people will get average desks (in the square configuration). A lot of people will be seated at really, really bad desks (rectangular configuration). The current ATO setup might not be perfect, but everyone essentially has the same desks, and they're relatively acceptable in design.

To put it bluntly... I'd lose my mind working in a place where desks don't even have a little barrier between workstations. I can't work with the constant looming idea that someone is watching my screen, even if they aren't doing so. I can't even use a computer at home if someone else is over my shoulder. I can't even read a book if someone is that close to me. The likelihood of getting one of those more segregated desks (Y-shaped workstations) seems low due to the low number of them, so I can't express much other than horror at this design choice.

If they showed some kind of barrier, such as small walls, I might be able to cope. And I can't tell from the drawings, but are there personal drawers at all? Because I use mine constantly. A lot of people do. And if they don't have personal drawers anymore, they need to provide a lot of desk space, because I (and many other people) will be putting personal items (bags, etc) on the desk in the absence of nearby drawers.

Luckily I do not work in the call center anymore, but I know that this work setup will be disgusting from a CSO perspective. Customers already complain when they hear any background noise, and unless CSOs are given noise-cancelling stereo headsets, the work environment will be highly disruptive to both the employees and the customers. I know that some call centers use this tight setup, and I also know that it's a terrible setup. For instance... if anyone in a computer line gets sick, everyone does, due to forced proximity. We currently don't have that issue.

For staff who need to go and see clients, they need a place to put their suit jackets and coats but in this new floor plan, are we supposed be wearing and sitting or putting it on our chairs. The reason I say this is that the lockers don't look that big in future workspace in Docklands Melbourne.

Although the layouts look 'pretty' on paper, in reality, for our area (ITX), they will not work. We have a lot of paperwork/tax payer info and data that needs to be securely stored at our

desks. It is not reasonable or practical to have a locker situated away from where we are sitting.

At the moment, we have a 4 drawer filing cabinet between two staff as well as a portable drawer unit under the desk. This is the absolute minimum we need – many auditors have the ‘half high’ cabinets with paperwork pending further action. The round table layout will not ever be used in our area – it is not a practical workspace.

You are unable to personalise your work station. I have had an OH & S person set up my work station so that it is set up correctly to ensure I do not sustain any workplace injuries. I do not have the knowledge to reset my workstation every day. This would be time consuming, imprecise and opens me up to injury.

One issue that some people would not place a very high price on is the sense of belonging that having your own desk provides you. It is a serious mental health issue. There are health and hygiene issues with the cleanness of some desks. I also had an example of someone having an allergic reaction after sitting at a desk in another office and the person previously using the keyboard had been eating peanuts to which he was highly allergic.

I worry about OHS when every day is a hotdesking day, where you constantly have to carry heavy files backwards and forwards from storage.