



21 August 2008

**Submission Number: 34**  
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Ms Scarlett  
The Secretary  
Standing Committee on Employment and Workplace Relations  
House of Representatives  
PO Box 6021  
Parliament House  
CANBERRA ACT 2600

Dear Ms Scarlett,

**Re: Pay equity and associated issues related to increasing female participation in the workforce**

In response to your request for insight into the above subject matter on behalf of the House of Representatives Standing Committee on Employment and Workplace Relations I am pleased to provide the following submission.

Overall Crown Melbourne Limited ("Crown") is comfortable with current reporting requirements and is satisfied these requirements aid industry to systematically review pay equity and workforce participation of women and inform on take any remedial action should issues arise. Crown practices open engagement in the issues with our staff and associated trade unions, which we believe has contributed to our high female participation rate in work and a strong return to work rate after maternity leave.

The terms of reference for the inquiry made specific reference to a number of key areas which are addressed more specifically below:

*The adequacy of current data to reliably monitor employment changes that may impact on pay equity issues.*

Crown maintains up to date and historical internal pay records that include all aspects of employment status to enable monitoring of changes. In our experience, the most relevant data which guarantees pay equity is to consult both comprehensive internal data and external market data as provided through commercial consultancies which specialise in salary analysis.



*The need for education and information among employers, employees and trade unions in relation to pay equity issues.*

Education and information is readily available to employers. Crown has found industry bodies such as VECCI to be particularly useful in this area. The company has also availed itself of the services of EOWA and non-government organisations working in the area of Diversity.

*Current structural arrangements in the negotiation of wages that may impact disproportionately on women.*

Crown maintains two Union Collective Agreements covering approximately 70% of staff which arguably reduces the risk of structural issues in negotiating wages.

However, in the experience of Crown, the male dominated unions with whom we deal tend toward higher paid Collective Agreements than those with higher female representation. Our experience is that male dominated unions do not pursue non-direct wage claims – such as the right to work part time or with flexible hours - but concentrate all their efforts purely on wage outcomes. They will trade off other conditions readily.

Crown has implemented formal processes to ensure that women, not employed under a Collective Agreement, returning from maternity leave outside the annual remuneration review dates receive any missed adjustments.

We have found that the best practice method of ensuring pay equity is to maintain a robust system of job evaluation, separate from incumbent ratings, and up to date independent market data on salaries. The most current and usable data of this nature is available though external commercial providers who specialise in salary survey data.

*The adequacy of recent and current equal remuneration provisions in state and federal workplace relations legislation.*

Unable to comment. Crown is not aware of any fundamental problems with the equal remuneration provisions in legislation that would result in pay inequity.

*The adequacy of recent and current equal remuneration provisions in state and federal workplace relations legislation.*

Crown sees a cross-portfolio impact in relation to women's access to training and flexible work after maternity leave. Crown provides access to part time and flexible work to women after maternity leave as a matter of policy and this has been taken up at a strong rate at all levels. However, the practical capacity to do this can be problematic due to the systemic problems in relation to childcare availability and cost. Furthermore, flexibility in access to childcare is almost non-existent for women who wish to retain and upgrade skills during periods of leave or when the return to work outside standard hours.



This is noted particularly in the light of the fact that best practice in work transitions – such as the return to work from maternity leave – is to enable a woman to return as early as possible, and to gradually increase her hours, rather than return after a long absence to full time work immediately.

Crown has a strong culture and practice of enabling return to work part time. This right is enshrined in the EBA and also practised at all levels within the company. The company's policy and practice facilitates part time and graduated return to work which has been successful in ensuring women's participation and thus also in meeting organisational skills gaps and avoiding intellectual property loss.

*The need for further legislative reform to address pay equity in Australia.*

Unable to comment. Crown is not aware of outstanding or pressing issues that require legislative reform.

Please do not hesitate to contact me if you would like any additional information.

Yours sincerely,

David Courtney  
Chief Executive Officer