

Partner Michael Moy  
Direct line 07 3233 8720  
Email mmoy@mccullough.com.au  
Our reference MAM:162501-00001

Lawyers | **McCullough  
Robertson**

1 July 2013

Mr L Forsyth  
Principal  
Hall Payne Lawyers

Email [LukeF@hallpayne.com.au](mailto:LukeF@hallpayne.com.au)

Dear Mr Forsyth

**Department of Community Safety - Queensland Ambulance Service v United Voice,  
Industrial Union of Employees, Queensland  
CA/2012/544**

We refer to your email this morning in relation to the proposed aggregated allowance.

We are instructed as follows:

- 1 Our client is prepared to include the percentages to be applied in the Determination.
- 2 Our client is prepared to accept a commitment similar to the one outlined at the first paragraph (2) of your correspondence as follows:  
  
"The aggregated allowance will be no less than the value of the sum of its constituent parts immediately prior to the introduction of the aggregated allowance".
- 3 In relation to the matters (1) to (3) about which your correspondence sought clarification, our client's instructions are as follows:
  - (a) the method currently utilised under the AWP will continue to apply to the whole of the aggregated allowance, not just the AWP component;
  - (b) the percentage is not altered and the public holiday is paid in addition to the afternoon or night shift penalty contained in the aggregated allowance. This is a substantial improvement on the current position on which public holiday penalties are paid but the afternoon and night shift penalties are not; and
  - (c) whilst a reconciliation process currently exists under clause 4.8.8 of the Determination, it is not routinely utilised in practice. It has been clear from the outset of this proposal that a

This communication (including attachments) is only intended for its addressees and may contain privileged or confidential information. Unauthorised use, copying or distribution of any part of this document is prohibited. If you are NOT an intended recipient please notify us immediately and destroy the communication.

**BRISBANE**

Level 11, 66 Eagle Street Brisbane QLD 4000  
GPO Box 1855 Brisbane QLD 4001  
T +61 7 3233 8888 F +61 7 3229 9949

**SYDNEY**

Level 16, 55 Hunter Street Sydney NSW 2000  
GPO Box 462 Sydney NSW 2001  
T +61 2 9270 8600 F +61 2 9270 8699

**NEWCASTLE**

Level 4, 251 Wharf Road Newcastle NSW 2300  
PO Box 394 Newcastle NSW 2300  
T +61 2 4924 8900 F +61 2 4924 8999

W [www.mccullough.com.au](http://www.mccullough.com.au) ABN 42 721 345 951

**Partners**  
Brett Heading  
Guy Humble  
James Peterson  
Peter Kennedy  
Susan O'Rourke  
Rodney Bell  
Ian Maxwell

Brad McCosker  
Damien Clarke  
Dominic McGann  
Bill Morrissey  
Stuart Macnaughton  
Brad Russell  
Sean Robertson  
Malcolm Robertson

Mark West  
Matthew Burgess  
Timothy Longwill  
Diana Lohrisch  
Patrick Holland  
Trudy Naylor  
Russell Thirgood  
Derek Drunk

Kristan Conlon  
Darren White  
Kristen Podagiel  
David Marschke  
David Downie  
Tim Wiedman  
Michael Rochester  
Maurice Rantlau

Matt Bradbury  
Scott Whitla  
Jeremy Kennedy  
Paul McLachlan  
Heather Watson  
Cameron Dean  
Janelle Moody  
Tina Webb

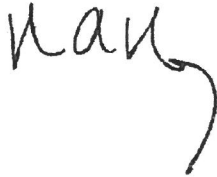
Michael Moy  
Tim Hanmore  
Brett Hawkins  
Tim Sayer  
Oliver Talbot  
Peter Stokes  
Isaac West

Mr L Forsyth

reconciliation process will not be undertaken under this proposal due to the number of significant improvements in wage outcomes associated with the aggregation itself (see 3(b) above and the fact that the aggregated allowance will apply to a number of leave entitlements to which that quantum of uplift does not presently apply).

4 Please provide your client's response by 2.30pm today.

Yours sincerely

A handwritten signature in black ink, appearing to read "Moy", with a long, sweeping tail that extends downwards and to the right.

**Michael Moy**  
Partner