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In reply please quote: *MS:ljm: A14/1464*

1 February 2016

Mr Peter Severin
Commissioner
Corrective Services
Henry Deane Building
GPO Box 31
SYDNEY NSW 2001

Attn: Cathryn Hellams, Director Workplace Relations

By email: Cathryn.HELLAMS@dcs.nsw.gov.au

Dear Commissioner Severin,

Re: CSNSW Administration and Stores Review Consultation

The Public Service Association of NSW (PSA) writes to you in relation to the Administrative and Stores review.

It is noted in your letter dated 20 November 2014 that the main objective of the review is to ensure that Corrective Services NSW (CSNSW) develop a staffing model that is consistent across all correctional centres based on activity levels and that each correctional centre has dedicated resources.. “

The PSA raises concerns there have been no formal discussions on a centre based level in regards to how the proposed staffing profile will work in the centres. The PSA submits that there is no clarification of what work each role will undertake to address their centre's needs. Furthermore, feedback indicates that there has been limited consultation with General Managers and in turn, minimal consultation with Business and Administration Managers. It appears from the feedback General Managers were advised that they will have to work out how to meet their business needs within the given allocation of staff.

The autonomy of enabling General Managers to allocate their staffing functions within the set graded positions is contrary to the key principals of this Review.

To enable the PSA to formalise a response, the members need clarity in regards to how the proposal will impact on them. The information provided by CSNSW lacks detail.

Throughout the meetings with members, members have identified concerns and generated questions to aid their understanding.

Position Clarification

1. Why are the positions not titled in line with other divisions of CSNSW? The titling of all positions in this review suggests that Administration and Stores staff is not a respected part of CSNSW. Furthermore, it undervalues the role they play in CSNSW. All staff across the agency at a Clerk Grade 9/10 are regarded as Managers. Likewise if a role has the responsibilities and functions of a Manager, they are referred to as Manager.
2. Why weren't workshops held with staff at each centre, WISE and MISE to canvas their views on how the centre should function, similar to workshops undertaken in other reviews in other divisions? For example Offender Management and Programs, Community Corrections.
3. Centres have identified there is not a clear rationale for the grading of positions in each centre. The Functions Task list is ambiguous and lacks detail. There are inconsistencies on how the tasks are allocated. The PSA requests a copy of the functional analysis completed on each position at your earliest convenience.
4. Feedback indicates CSNSW's intention for the Clerk Grade 3/4 positions' creation was to ensure compliancy and probity mechanisms. Is this correct?
5. Feedback also strongly indicated that the Review is modelled on the South Coast Correctional Centre, Mid North Coast Correctional Centre and Wellington Correctional Centre business processes and tiered staffing model - is this correct? What is the rationale for using this model and how will this be applied in all centres?
6. The review fails to acknowledge the dedication and work ethic of staff that have specific areas of responsibility. The generic nature of this review, no longer identifies key functions including Stores, Personal Assistants, Account Officers. Has CSNSW assessed the impact this will have on staff by creating this attitudinal shift and culture change? It appears that CSNSW does not acknowledge nor value that administration staff go above and beyond to ensure the smooth running of the centre.
7. Will 5 of 7 day positions be affected by the Review?
8. 5 of 7 day positions are not noted in the proposal document. How many 5 of 7 day positions exist, where and classification of work?
 - a. Is there rostering principles in regards to how they are rostered?
9. How many current vacancies exist state-wide in Administrations and Stores?

10. CSNSW have previously indicated only two positions state-wide are filled with Contractors. This appears inconsistent with information provided by members. How many Contractors, Agency Temps, Labour Hire positions are currently occupying positions with Administration and Stores. How many are proposed under new structure?
11. Why are two positions state-wide identified as dual role i.e. 0.5 Sentence Administration and 0.5 Administration and graded as a Clerk Grade 1/2? When dual roles across the state are Clerk Grade 3/4.
12. What will occur in current dual position roles i.e. 0.5 Sentence Administration and 0.5 Administration, when the 0.5 Administration has been identified for regrading to 0.5 Clerk Grade 1/2 and the additional 0.5 is graded Clerk Grade 3/4?

Role Clarification

13. What role will undertake the functions of monitoring and controlling the centres budget in Brewarrina, Ivanhoe; Kariong; Cooma; Broken Hill, Oberon, Mannus; Tamworth; Grafton, Glen Inness and Silverwater? These functions are outside the Clerk Grade 5/6 Role Description.
14. Additionally, what role will provide advice on financial and procurement activity in Brewarrina, Ivanhoe; Kariong; Cooma; Broken Hill, Oberon, Mannus; Tamworth; Grafton, Glen Inness and Silverwater, as again these functions are outside the Clerk Grade 5/6 Role Description?
15. Will the Corporate Clerk Grade 11/12 have delegation over the 5/6 Administrative Officers or will the General Managers be the direct line supervisor and indirectly these positions report to Corporate Clerk Grade 11/12?
16. Will General Managers lose their \$50 000 financial delegation in Brewarrina, Ivanhoe; Kariong; Cooma; Broken Hill, Oberon, Mannus; Tamworth; Grafton, Glen Inness and Silverwater. If not, who will determine if an order can proceed, when there is no one on site that can provide advice on financial and procurement activity? There is competing interest this will place the Administrative Officer Clerk Grade 5/6 at risk of intimidation, bullying and harassment.
17. Will the Clerk Grade 9/10 have any responsibility for developing staff rosters?
18. Why does the Clerk Grade 9/10 have Sentence Administration and Classification under their role? When will consultation occur with changes to these areas? What is the rationale for the changes to these business units?
19. It is unclear how the grades have been determined when the functional and task list identifies the same tasks being undertaken by a Small Centre Clerk Grade 5/6

and Large Centre Clerk Grade 9/10. The same capabilities are required, the same delegations, responsibilities, deadlines, reports, business processes are undertaken. All managers undertake the same tasks and should be paid the same in line with capabilities.

20. What is the rationale for downgrading the Business Managers 11/12 position?
21. How does a Administrative Coordinator Clerk Grade 7/8 and Senior Administrative Officer Clerk Grade 9/10 differ in their functions and task, is there clear areas of responsibility and how will this be determined?
22. What role will coordinate stores staff and supervise inmate trainees and/or sweepers as these functions do not fall with the Clerk 3/4 Role Description? Logistically due to the location of the Warehouse/Stores, the Clerk 7/8 would be unable to undertake these duties.
23. What role will CSI play in Stores positions, will CSI take over all Stores functions, what impact does this have on reporting arrangements? Stores staff should remain under the Administration Manger or Senior Administrative Officer/Administrative Officer.
24. It is unclear how Stores will operate in the metro areas, will there be service level agreement, what structures will be used to allocate staff?
25. Stores positions are required to hold forklift licenses and in some locations MR licences - this does not form part of the role descriptions. How will this be identified when the role titles and descriptions are generic and there is no differentiation of duties amongst Administrative Assistants Clerk Grade 1/2 and Assistant Administrative Officer Clerk Grade 3/4?
26. How have efficiencies been addressed in shared complexes, otherwise duplications will occur?
27. Inconsistencies at a centre based level occur within functions and tasks undertaken by administration staff, CSI and Custodial duties. Will this be addressed to define who undertakes what function at each centre to ensure consistency and how will this occur?
28. The entry point into all other CSNSW divisions and the broader Department is Clerk Grade 1/2. Why is the entry point to Administration point not in line with other CSNSW divisions?

Due to the duties and the flexibility with role rotations as Administration Assistant, the General scale positions should be a Clerk Grade 1/2. The PSA is happy to provide more information in regards to this in our final submission. However, it should be noted that all General Scale Positions should be upgraded to a Clerk Grade 1/2, this was supported unanimously by our members.

Training, Professional Development and Performance Management:

29. Will there be standardised training for Administration and Stores staff noting there will be standardisation of roles and consistency across centres?
30. What career development opportunities will exist within Administration and Stores division at a centre based level to enable career progression noting only two centres state wide have Clerk Grade 1/2; Clerk Grade 3/4; Clerk Grade 5/6, Clerk Grade 7/8 and Clerk Grade 9/10 roles in the centre?
31. It appears to members the current model will reduce staff skill base and result in a culture of micro managing staff. How will this be addressed by CSNSW?
32. The current proposal does not make it clear which role is responsible for leave approvals and performance management. Can you please articulate which role/roles undertake these functions?

Leave

33. How will leave or short term vacancies be filled in Centres?
34. Will short term vacancies, that is vacancies less than two weeks duration, be back filled or will only periods of leave two weeks or more be back filled?
35. Will periods of leave be subject to an EOI process or will this be determined at the Managers discretion?
36. How will CSNSW manage fair and equal access to developmental opportunities?
37. Will the Clerk Grade 3/4 in medium centres, automatically act up to the Clerk Grade 7/8 when accessing leave or will equal opportunities exist for Clerk Grade 1/2 and General Scale Clerks?
38. Likewise will the Clerk Grade 7/8 in large centres automatically act up to the Clerk Grade 9/10 when accessing leave or will equal opportunity exist for administration and stores staff within the affected centre? Noting Clerk Grade 3/4 to Clerk 9/10 is more than two grades above.
39. How will CSNSW manage staff's ability to access developmental opportunities at other centres, as a leave relief position has not been factored into the centres staffing profiles (except Wellington)? Concerns are noted that staff will not be released due to operational reasons.
40. Will there be a relief-pool established to enable leave vacancies to be filled, noting

many centres administration and stores staff assist in the centre to cover other divisions' leave periods (including Sentence Admin; Rosters, and Classification)?

41. If a staff member acts in another position, will they still be required to do there substantive role simultaneously?

Standard Operating Procedures, Business Guides, Policies and Procedures

42. There are no Standardised Operating Procedures, nor Business Guidelines, Policies nor Procedures for Administration and Stores Staff. If consistency is to be achieved Administration and Stores Staff should be in line with other divisions of the Agency, i.e. Sentence Administration and Offender Management Programs that have Task Lists.

As CSNSW have graded the positions and developed the review with the key principle of consistency, the PSA seeks a copy of:

- a. Task Lists
- b. SOPs for the Administration Staff for consultation.

This will also help alleviate inconsistencies moving forward and provide clarity of what each position is intended to do.

Affected Staff

43. Considerable concern is generated in regards to a lack of clarity of what will happen to staff that are identified for deletion. How will affected positions be filled? There are inconsistencies with the Draft Implementation Plan, dated October 2015 and the Assistant Commissioners, Custodial Corrections Memo dated 23 October 2015.
44. Will opportunities be available for members to apply for a location as priority?
45. Will priority assessments and/or appointment at grade be done state-wide or undertaken by the General Manager at the Centre.
46. All Centres were informed that grandfathering will occur to positions; this information is inconsistent with the information given on 15 December 2015.

Environmental Allowance

47. How will the environmental allowance be applied to the Stores and Administration Staff, all positions need to be afforded this allowance as recognition of the environment that they work in and the constant contact with problematic external

parties.

We seek a meeting with the Department to discuss this and other matters. I can be contacted either by email at msinclair@psa.asn.au

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'm Sinclair', written in a cursive style.

Michael Sinclair
Industrial Advocate