

Mr. Graham Perrett MP
Committee Chair
Parliamentary Standing Committee on Public Works

Please find a response to the submission tendered by the Australian Services Union (ASU) on to the ATO's new leased premises at 6 Parramatta Square. The ATO has addressed each of the ASU's concerns as outlined in its submission.

The ATO is committed to providing high-quality office accommodation that meets the professional needs of its employees. Engagement and consultation with staff and their representatives are a core feature of design in all new fit-outs.

The ATO has a well-established and mature process to deliver new fit-outs. Design teams utilise a comprehensive suite of guidelines that have been developed over several years, as well as all relevant building codes and Australian Standards. The process also incorporates staff engagement and employee consultation.

In addition to 6 Parramatta Square, since 2020 the ATO has provided three other submissions for the Parliamentary Works Committee (PWC) to consider, including new fit-outs in Townsville, Wharf Street Brisbane, and George Street Sydney. Those fit-out projects incorporated similar employee consultation and design process that has been adopted in Parramatta.

1. ATO Consultation with staff and their Unions has been inadequate.

Design processes are undertaken by engaging early through the formation of a Site Working Group (SWG) made up of nominated representatives from all business areas that will occupy the new building. The Parramatta SWG was formed in December 2021 and commenced regular meetings on 16 February 2022 to capture business requirements.

The ATO's external design team incorporates these business requirements to develop concept designs, which are used for the purpose of developing a proposed design and costing the fit out.

A dedicated intranet page has been made available that contains frequently asked questions (FAQs) and is regularly updated with details of the SWG meetings and other updates as they become available.

In line with Clause 87.3 of the ATO's Enterprise Agreement which states "*Where a decision has been made to have new accommodation or modify existing accommodation, affected employees and where they choose, their representatives will be consulted*", a planned formal consultation process with staff and their representatives began on 20 September 2022.

This consultation process includes 22 separate information sessions. Staff have an opportunity to ask questions either in these sessions or via a dedicated email address. For those unable to attend any of the scheduled sessions, video recordings with supporting scripts are made available. In addition, a comprehensive information pack including the FAQs are provided to staff at the commencement of consultation and are accessed via the intranet page, which staff can access at any time. Copies of these documents are provided to unions representing ATO staff at the commencement of consultation.

All feedback throughout this process is considered and changes are made where necessary. Consultation on ATO fit-outs typically occurs around the time that the PWC considers the ATO's submission or soon after. Given the engagement and upfront input from nominated business representatives via the SWG into the concept design, changes are not expected to be substantial in nature. Any changes to the design after PWC approvals are therefore managed within the approved budget.

The ATO has demonstrated its commitment to listening to staff and being responsive to feedback across all previous projects with numerous examples of changes made following concept design and PWC submissions / approvals.

2. Reduction in total space

The ATO follows the Government guidelines to target a fit-out density of 12m² in order to meet the Government's requirement of a minimum occupied density of 14m².

The proposed density targets for Parramatta are consistent with all new ATO fit-outs over the past several years including in Gosford, Moonee Ponds, Townsville, Wharf Street, Brisbane and George Street, Sydney offices.

The improvements in density have resulted in a reduction in Net Lettable Area (NLA) compared with the ATO's current Parramatta site.

3. Prayer Room

All ATO fit outs include multifunction private rooms, often utilised for the purpose of prayer. Throughout the consultation period, feedback can be provided on the number, size, and level of services provided in the multipurpose rooms and for example, additional amenities such as wash areas may be included based on this feedback.

4. Lunch and break out facilities

The ATO's external design team were provided with staff numbers and have designed breakout areas to cater for these numbers, applying industry best practice, consistent with the design of all other ATO sites.

The breakout area seating capacities are designed to accommodate 45% of staff at any given time. This complies with the *Safework Australia-Code of Practice for Managing the Work Environment*, which recommends that adequate numbers of tables and seats to accommodate each worker likely to use the dining room at one time be provided.

The number of amenities are dependent on the number of breakout areas and staff allocated on a floor.

5. Toilet facilities and squat toilets

Toilet facilities in the 6 Parramatta Square building are provided by the landlord and are not part of the ATO fit-out design.

The toilet facilities in the building align with a maximum 10m² fit-out density. As the ATO is targeting a fit-out density of 12m² there will be less staff within the ATO site than the maximum capacity of the toilets.

Natural position (or squat) toilets have not been identified to date as a requirement. Any feedback provided through staff consultation will be considered.

6. Disability bathrooms

The ATO ensures that all new fit outs meet the National Construction Code and are compliant with the Disability Discrimination Act. All accessible toilets meet these standards at a minimum.

The ATO has a dedicated Work Health and Safety (WHS) team who are represented on the SWG and provide information on any additional WHS needs throughout the design process.

If additional requirements arise during the life of the lease, the ATO will undertake a reasonable adjustment assessment and appropriate actions will be taken to ensure all staff are fully supported.

7. First Aid Rooms

First aid rooms in ATO fit-outs are designed based on the requirements of the *Safe Work Australia – First Aid in the Workplace Code of Practice* (Code).

There is no proposal to include a toilet in the first aid room noting bathroom facilities are located close by. There will however be a sink installed in the first aid room in addition to requirements outlined in the Code.

8. Hot desking

The ATO looks to implement unallocated work environments, wherever possible, to optimise staff experience and office utilisation. Unallocated fit-outs support contemporary and different ways of working as well as ease of staff collaboration and have been successfully adopted across numerous ATO sites since 2014.

The consultation process outlines the proposed unallocated fit-out in the Parramatta site and is open for feedback from staff and their representatives. More detailed information is provided in the FAQs available to all staff and unions during consultation.

Almost all ATO business areas now have at least some staff working in one of the ATO's unallocated work environments nationally and have confirmed these settings meet their business needs. Sites operating with unallocated work settings include Gosford, Townsville, Geelong, Moonee Ponds, Elizabeth Street in Brisbane and shortly, offices at Wharf Street Brisbane and George Street Sydney.

The ATO acknowledges the importance of ensuring that staff have adequate support when transitioning to a new accommodation environment and adopts a rigorous change management process leading up to, throughout and following the transition period.

All ATO unallocated fit-outs use neighbourhoods to manage space utilisation. Business areas are assigned to a particular neighbourhood that is sized to ensure that there are always suitable workstations and lockers available. Additional team lockers are also provided in these neighbourhoods.

Consideration is given to specific work types and the design team looks to deliver solutions where issues are raised. While all ATO office settings are designed to be open plan irrespective of whether staff are in an allocated or unallocated environment, where there are specific requirements for quiet work activities, particular teams would be allocated to a neighbourhood on a floor that reduces pedestrian traffic and mitigates noise concerns.

Where feedback from staff or business areas demonstrates that there is a particular work process that is unable to be accommodated in an unallocated fit-out, those staff or business areas may be allocated within a neighbourhood. An increase in working from home following COVID-19 clearly demonstrated the agility and flexibility of ATO staff in relation to how they work as well as their ability to adapt to different work environments.

9. Lockers

The size of the lockers is based on learnings and feedback from recent ATO fit-out projects. Staff feedback has demonstrated that the proposed locker sizes are sufficient for staff needs. Additional team lockers are also provided across the fit-out for additional storage needs.

10. Bicycle racks, showers and lockers to encourage walking, running and cycling

The ATO places a strong emphasis on supporting staff wellbeing and encouraging activities such as exercise including supporting a number of site-based health and wellbeing activities. Requirements for End of Trip facilities form part of the ATO's leasing process and are required as part of the base building services supplied by the landlord. The quality of facilities, number of showers, number of lockers and number of bike racks are assessed through the leasing process.

6 Parramatta Square is a new development and provides high quality End of Trip facilities. Full details of the change rooms, bicycle storage, lockers and any other base building services have been provided through the current consultation process.