Committee Secretary
Senate Education, Employment and Workplace Relations Committee
Parliament House
Canberra ACT 2600
Australia

Dear Secretary

RE: Inquiry into the Fair Work Bill 2008

The national group of Working Women's Centres (WWC's) are pleased to provide the following submission to the Fair Work Bill Inquiry 2008.

The WWC's includes the South Australian Working Women's Centre Inc (WWCSA), the Northern Territory Working Women's Centre Inc (NTWWC) and the Queensland Working Women's Service Inc (QWWS). Each are community-based not-for-profit organisations that support women employees whatever their age, ethnicity or work status by providing a free, confidential and specialised service on work related issues. All three organisations are small agencies that rely on funding from the Commonwealth (SA and NT), State (SA and Qld) and Territory governments (NT).

The WWCSA opened in 1979 and NTWWC and QWWS in 1994 and are very well known and respected by women across Australia for information, advice and education about work issues. The WWC's were in direct contact with over 6000 Australian women during the year 2007/2008.

The WWC's also conduct research, project work and are active in contributing to policy in the area of women and employment. This submission will consider the proposed Fair Work Bill and is based on information collected from all three WWC's.

Matters will be addressed with reference as relevant to the purpose of the Bill stated as:

- establish a guaranteed safety net of minimum terms and conditions;
- ensure that the safety net cannot be undermined by the making of statutory individual agreements;
- provide for flexible working arrangements;
- recognise the right to freedom of association and the right to be represented in the workplace;
- provide procedures to resolve grievances and disputes;
- provide effective compliance mechanisms;
- deliver protections from unfair dismissal for all employees;
- emphasise enterprise level bargaining underpinned by good faith bargaining obligations and rules governing industrial action; and
- establish a new institutional framework to administer the new system comprising Fair Work Australia and the Fair Work Ombudsman.

Summary of Submission

- Unfair dismissal remedy should be afforded to all employees regardless of business size, with the only exceptions being:

  Those within 3 months probation or;

  Casuals not working regular and systematic hours or;

  Casuals working regular and systematic hours for under 6 months or;

  Genuine fixed term or seasonal employees;

  High-income earners.

- Demotion should not be permitted to avoid unfair dismissal obligations.

- Host employers within a labour hire arrangement should be respondent to unfair dismissal applications when their conduct or course of conduct leads to the end of the host employment arrangement.

- The time limitation for an application should be 21 days no less.

- Period of employment should not revert to day 1 upon a transmission of business without notice from the new employer.

- Period of employment should not revert to day 1 upon promotion or transfer to another position with the same employer.

- Minimum period of employment should not be different based on the size of a business.

- There should be a penalty against employers for providing misleading information on the Small Business Fair Dismissal Code checklist.

- Summary dismissal must not enable injustice via unsubstantiated or erroneous claims by employers.

- A valid warning alone should not warrant dismissal. Natural justice must be applied.

- Employees must be afforded right of reply to accusations of misconduct.

- Impacts of Award minimisation and failure to entrench equal pay for work of equal value principles must be adequately addressed.

- The definition of caring responsibilities should be the broad definition of family. It should include infants but also parents, siblings, spouses etc.

- Right of Entry provisions need to apply specifically for TCF workers.

- The Bill must include protections for all outworkers no less than what currently applies by way of the Fair Work Act and Mandatory code in South Australia.

- A framework for individual flexibility agreements is required.

- AWA's to meet the Better Off Overall Test (BOOT).

- Appointment of bargaining agents should be limited in number to ensure systemic issues for women are not overlooked.

- Cashing out sick leave and annual leave pose a risk to work life balance and health and should not be available.

Employee exclusions for unfair dismissal – Sections 382 to 386

The WWC's believe all employees should have access to an unfair dismissal remedy with the only reasonable exclusions being:

That contained in Section 382 or;
Employees within 3 months probation or;
Casuals not working regular and systematic hours or;
Casuals working regular and systematic hours for under 6 months or;
Genuine fixed term or seasonal employees

The WWC's believe the process to terminate an employee on the basis of performance conduct or capacity is not a complicated process and affords natural justice, which should outweigh expediency or enabling ignorance of employers in terminating employment.

In fact we would recommend that a business registration or re-registration should not be accepted unless the employer can demonstrate knowledge and capacity to implement basic IR laws.

Demotion permitted to avoid obligations for unfair dismissal – Section 386(2)(c)

Section 386(2)(c) providing that a demotion is not a dismissal is considered to be a provision that is likely to be exploited by unscrupulous employers when an employee unaware of Section 386(2)(c)(ii) and/or due to financial reasons stays with the employer.

Our experience is that unilateral changes to employment conditions are rarely recognised by

employees as a breach of contract let alone an unfair dismissal. Demotion is often argued as a breach of the trust confidence and good faith in the employment relationship.

The matter of demotion in respect of performance management processes should be dealt with on a case by case basis between the employee and employer and their respective representatives with the protection of an unfair dismissal remedy where an employer acts unfairly.

Demotion should not be excluded in the meaning of unfair dismissal.

Host employers within a labour hire arrangement – add to Section 386(1)

WWC's experience is that employees may have a good relationship with a labour hire company who is their employer but are vulnerable in the hands of unscrupulous host employers, supervisors and agents at their place of work. The labour hire company often has the dilemma of losing clients (i.e. host employers) by addressing unfair treatment of their employees. The employee is reluctant to take action against the employer, the labour hire company for failure to enforce reasonable conduct by the host employer by for example a breach of contract action and there is no statutory recourse for the employee against the host employer.

Host employers should be respondent to unfair dismissal applications where their conduct or course of conduct leads to the end of the arrangement.

7 day time limitation for application for unfair dismissal - Section 394(2)

The WWC's believe that the introduction of the significantly shorter time frame than the current provision of 21 days for an application in the case of alleged unfair dismissal will exclude many legitimate applicants particularly the most vulnerable workers. The WWC's can provide accounts of clients who have taken weeks, not days, to collect themselves sufficiently to consider contesting their dismissal.

Many people remain confused with the complexity of unfair dismissal laws particularly when there have been many recent changes to jurisdiction, structure and entitlement. For example whilst long term casual employees working regular and systematic hours have been not been excluded for some years now many casual workers are unaware of this. Clear understanding of

Workplace Relations law remains the privilege of the few and often it takes employees several weeks to seek the appropriate assistance.

The distress and dislocation suffered by an individual who has been terminated further means it is highly likely that it will be some time before they are able to think about possible action.

An analysis of client data from the Northern Territory Working Women's Centre (NTWWC) for the July – October 2008 period reveals:

- 80.6% of women who contacted the NTWWC for assistance or information regarding a termination of employment issue contacted the Centre 8 days or more after the termination had occurred.
- Only 19.4% of women who contacted the NTWWC for assistance or information regarding a termination of employment could consider lodging a claim for unfair dismissal as only this number contacted the Centre within 7 days of the termination having taken place.
- Importantly, 100% of Aboriginal and Torres Strait Islander women who contacted the Centre regarding a termination of employment issue did so after 7 days had lapsed. Indeed 6 out of the 7 Aboriginal or Torres Strait Islanders women who contacted the Centre did so after a minimum of 22 days had lapsed.
- Also, 100% of Cultural and Linguistically Diverse women contacted the Centre after 7 days had lapsed.

Case Study – Kaye[1]

Kaye is a 17 year old Aboriginal woman who works in an extremely remote part of the NT. Kaye had immense family responsibilities, which included caring for her mother who was subjected to regular family violence. Her caring responsibilities led her to ask her employer for additional leave. When she made the request for leave to her non-Aboriginal manager she was told that she needed to choose between her family problems or her job. The following day she was unable to travel the 10 kilometres to work as no family member could provide her with a lift (there is no public transport available in her community) and she was terminated. No performance issues were ever raised with her.

Kaye contacted the NTWWC for assistance as she had just recently spoken with a friend who told her there was such a thing as unfair dismissal that

[1] Whilst personal identifying details have been changed or omitted to protect the identity of clients, case studies provided are based on real stories of WWC clients.

existed. Unfortunately Kaye contacted the NTWWC on day 23 after the termination of employment occurred. When the NTWWC asked Kaye why is was that she hadn't contacted the NTWWC earlier Kaye said she didn't know that unfair dismissal existed. When the worker asked Kaye if she was a union member, Kaye responded by asking 'what's a union?'.

The WWC's have high contact from regional and remote women and have noted the difficulties in assisting with or lodging applications for these women within the 21 day time frame. For regional workers who do not readily have access to a computer and the Internet it may take up to 2 days with postal deliveries to and from a client and then 2 days to the place of lodgement. That is 6 business days alone without including time for advice collection of information and completing the application.

Additional constraints apply to remote workers. This may include a number of hours driving to obtain advice and assistance.

From a practical perspective for the WWC's and for other agencies assisting with unfair dismissal claims the time required to collect the relevant information and prepare the application typically extends far beyond 7 days. Such a short period would place increased pressure on our already few resources. In addition, no assistance can be sought from government agencies or most community services including our services on the weekend.

Employees with low level English language and literacy skills will be prejudiced in obtaining information within the short time frame due to communication difficulties and the availability and cost of interpreters or support persons at short notice. The federal government should provide free interpreters to government and relevant community agencies to assist with preparation of their matters.

All other limitations are between 21 and 28 days. In this light a shorter limitation is considered punitive on the terminated employee.

We suggest that the filing of applications within the time frame will likely lead to inadequate or incorrect information being provided which will cause processing difficulties, requirement for additional follow up work and delay for FWA, employees and employers alike.

Conversations with the business community, including AMMA, indicate that employer bodies say they did not press for a reduction to a 7 day time limitation to lodge for unfair dismissal and can see no reason why it shouldn't stay at 21 days.

There should be an appeal process for applicants if FWA do not accept a late application.

We also consider the shorter limitation will produce an increase in out of time arguments and thus a more laborious process for all.

It is our view that the main purported benefit of an increased likelihood of reinstatement is flawed. Our experience is that in the majority of cases at the time of termination the relationship between the employer and employee has broken down to the extent that reinstatement is not possible. For the most part genuinely unfair terminations are a breach of the trust and confidence and goodwill by the employer. In our experience employers also accept that a reinstatement, whilst ordered is not likely to be sustained.

Minimum employment period and transmission of business employees - Section 384

Subsection 384(b)(iii) provides that the period of employment is not recognised in a transmission of business if the new employer advises such in writing before the new employment commences.

A particular difficulty arises in transmission of business when employees remain in the workplace on the basis of verbal assurances from an employer as to continuity of workers' conditions up to the day before the new employment starts which prejudices employees in their decision to remain with the new employer.

We propose an amendment to include notice of recognition of continuity of service or otherwise relative to the notice period for termination of employment. This would not be an imposition on the new employer's freedom to contract and operate their business as it would not interfere with the freedom for an employer and an employee to negotiate other terms, but it would make sure that employees were not losing their rights unaware of their entitlements. Both parties would have to turn their minds to that issue and negotiate an appropriate solution.

Minimum Employment period/difference for small business - Section 383

Again we believe the process to terminate an employee on the basis of performance conduct or capacity is not a complicated process and affords natural justice , which should outweigh expediency or enabling ignorance of employers. This process should be followed to demonstrate that a dismissal has not been carried out capriciously or through ignorance of an employee's entitlements.

Small businesses have the added benefit of ability to closely interact with staff and should not have a different period imposed.

Small Business Fair Dismissal Code - Section 388

We do not believe that it is onerous on small business to participate in a conciliation conference and that it is essential that small business be accountable when they are making decisions that impact on the livelihoods of vulnerable employees.

If the code is truly a process that is recognised as fair in the termination of an employee and it is accepted by employer groups it seems that it should be subject to scrutiny by the employee and their representative in a conciliation conference. The mere production of documents to a government agency is too open to exploitation. Documents may well be fabricated after the event. Our current experience is that employers will often come to conciliation conferences with paperwork which has never been seen by the employee and which we suspect has been completed after the event of the termination.

The checklist may be a useful starting point for employers to assist them in dismissing an employee fairly but it is clear that much of the checklist could be disputed by an employee. It is not apparent how FWA will be able to assess genuine compliance.

Our experience is that too many employers either ignorantly or deliberately incorrectly complete the Separation Certificate required by Centrelink and we do not see that the completion of the checklist will be any different.

It is highly likely that unscrupulous employers may simply use the checklist after the fact of

dismissal to provide a readymade justification for the termination and this may have little or no relation to what occurred.

Taking the checklist on face value will prejudice the terminated employee. Employers should be required to provide evidence of compliance and this should also be provided to the employee with the right of reply, appeal, remedy and representation.

There should also be a penalty for employers for providing misleading information in regard to the checklist.

Summary dismissal

We have concerns about the clarity of the summary dismissal examples.

In relation to serious misconduct the example given of failure to follow a 'reasonable and lawful command' is contentious. The area mentioned is in reality a highly subjective and contextual matter.

Our experience is that too many employers though ignorance or vexatiousness tick 'misconduct' on the Separation Certificate required by Centrelink when this is in fact not what occurred as agreed by the employer under scrutiny.

In the case of theft: while an employer may discover a theft and report it to the police there are cases where there is no possibility the employer can know the perpetrator yet an example is made of one employee who in turn has no access to natural justice. It is against the principles of natural justice that an employee be 'convicted' of a theft based on a mere report to police with no independent investigation or conclusion.

In our experience accusations of theft in genuinely unfair terminations seldom stand up to scrutiny.

Dismissal after valid warning

We contest that a valid warning does not necessarily warrant dismissal. The warning may be valid

but concern a trivial or insignificant matter. Employees who are targets of workplace bullying are particularly vulnerable in so far as receiving trivial or insignificant warnings is concerned. In addition the matter pertaining to the warning may not be something within the employee's control or may arise from a failure of the employer to adequately train or instruct an employee. In one recent matter reported to WWC SA an employee received a warning for 'clicking a pen' during a meeting.

There must be a fair process to investigate such a claim by employers.

Concerns about Gender Pay Equity and Award Minimisation for women.

In Australia 60% of low paid (award dependent) workers are women, with women now constituting 45% of the workforce and the majority of workers on Awards being women. On average, women earn less than their male colleagues from the point they enter the workforce regardless of occupation, industry or level. Women working full time will still earn on average about 15 per cent less than men working full time (Australian Bureau of Statistics (ABS), 2008). Furthermore, low paid, Award free workers tend to work in occupations with low levels of union coverage and do not share very basic entitlements such as penalties, uniform allowance or leave loading. These employees who are mostly women encompass occupations such as tour guides, nannies and sex workers, will rely not only on a guaranteed safety net of minimum terms but should also be covered by a "catch-all" Award that should include general additional protections that are generally found to be enshrined in 'modern awards' including:

- The pay equity remuneration principles.
- Avenues for dispute resolution.
- Reasonable provisions for overtime.

Under existing legislative structures women have still not gained pay equity and Australia has amongst the highest rates of occupational segregation in the OECD, with female workers concentrated in a narrow band (namely service industry) of occupations such as the service industry. While several State Industrial systems have now adopted pay equity principles that have facilitated award variations and test cases have facilitated pay increases in female dominated industries (i.e. child care workers and dental assistants) to be phased in over a number of years, the Fair Work Bill fails to adequately consider that Award minimisation and failure to entrench

equal pay for work of equal value principles will disadvantage women more than men in the labour market.

The effects of Award minimisation that have occurred since 1996 culminating in the skeletal framework of 5 minimum entitlements under WorkChoices in 2006 have disproportionately impacted on women who have higher reliance on Award and minimum wages. While the WWC's are pleased with the increase to 10 National Employment Standards it is important to recognise that we have seen a decline in the minimum wage as a proportion of median earnings and a growth of women workers who are low paid from 15.9% in 1989-90 to 27% in 2004 (Masterman, Pocock and May 2007). Extra measures are required to avert this trend from continuing.

WWC's are concerned that the process of rationalising modern Awards and restricting allowable matters in Awards will result in female employees losing entitlements. The adoption of industry Awards may also impact negatively on women by failing to recognise specific skills and qualifications that would be reflected in occupational awards. The Fair Work Bill should include stronger legislative measures to address Pay Equity and needs to recognize what they have attempted and encourage that it goes further.

As is seen in our client base, women employed in Australia dominate in the service industries, which are relatively low paid occupations. However within these industries women still earn less that men:

For example:
In health and community services 14% less;
In education 11.7% less;
In retail 6.6% less;
In the finance sector women earn 23.2% less.
(Source ABS Cat Nos 6303,6310).

Gender pay inequity impacts on women's capacity to attain economic independence and has consequences on women's retirement and dependency on welfare. Persisting or increasing gender pay inequity will have negative consequences for women and welfare dependency in an aging population and for the cohort of women who are anticipated to be working in jobs that only reflect a minimum safety net of entitlements and do not compare favourably to average Australian earnings.

History has shown that during the WorkChoices legislation many employees were offered working conditions that fell below Award conditions for similar work. In the experience of WWC's clients who were offered individual Workplace Agreements there was very little or no opportunity to genuinely bargain and pay remained low while some entitlements were lost altogether. While many women accept part time or irregular hours of work to assist in balancing their family or caring responsibilities many individual agreements did not offer appropriate overtime or loading provisions that would be payable under Awards or would serve to compensate otherwise. The WWC's are pleased that the safety net will not be able to be undermined by individual statutory agreements.

Flexible work arrangements and narrow definition of caring responsibilities – Section 65(1).

The WWC's are disappointed that Division 4 Section 65 (1) of the Bill (Requests for flexible working arrangements) refers to and is limited to parents of a child under school age; or has responsibility for the care of a child under school age. There is no provision for carers of people with disabilities, for children of school age or for carers of elderly family members.

A focus on carers as only those who have responsibility for children under school age may disadvantage many people in a variety of family situations and particularly Indigenous people and some culturally and linguistically diverse groups. Cultural norms of such groups requires caring for a much wider group of family members than just children under school age. Nor does it recognise that caring and other non-work responsibilities make varying demands at different life-cycle stages. It also completely ignores the issue of school holidays or transitions into different care or schooling arrangements or the other demands of children, which can have a significant impact on availability and need for flexibility of work.

This section outlines entitlements for specified employees to request flexible work arrangements for a child under school age. This excludes carers of people with disabilities that are over school age (up to 16) or for carers of elderly family members.

Subsection 65 (5) states that an employer may refuse the request only on 'reasonable business grounds'. This term is again used in Subsection 76(4) stating that an employer may refuse an application to extend unpaid parental leave only on reasonable business grounds. We consider that 'reasonable business grounds' should be clearly defined in the Bill. We also note that FWA does not have the capacity to settle a dispute about whether an employer had reasonable business grounds.

The WWC's believe that 'reasonable business grounds' will be a commonly used justification for denying employees flexible work arrangements as outlined above.

WWC's would prefer a clear and simple definition or test for 'reasonable business grounds'. WWC's believe that a clear definition should reflect only financial hardship or detriment to the business. Anti-discrimination legislation uses ambiguous words such as 'reasonable'. This has led to confusion and unnecessary arguments relating to intention.

Further, in circumstances where an employee is denied such a request employees may make a discrimination complaint under federal or state anti-discrimination legislation or State Industrial Relations legislation. Thus, the lack of redress as it pertains to this Bill, will be very contradictory and confusing for employees and employers and leave employers open to the uncertainty of a challenge for periods of up to 12 months should the employee decide to access Anti discrimination legislation. For this reason we believe that employees should be able to challenge negative decisions via access to Fair Work Australia immediately and have their matter conciliated and if unresolved have orders made that are enforceable. This approach seeks to address potential conflicts and breakdown of employment relationships at work before they become intractable.

In our experience most of our clients, along with many other women workers, find it difficult to initiate or sustain negotiations with their employer about flexible working arrangements. It is especially untenable for Indigenous women, culturally and linguistically diverse women or women who don't have an in depth understanding of other options available. For such women the difference in bargaining power is profound.

Examples

1. Maria applied for maternity leave, which was granted although she was not a long term employee. While on maternity leave Maria was told her position was terminated due to a transfer of business and would be rehired on a casual basis. Maria challenged this and requested to re-enter as a permanent part-time employee. Her employer ignored her request and has not responded to any of her efforts to negotiate her return to work.

2. Emma applied to return to work in a permanent part time position after the birth of her second child. Her request was denied until she pointed out that it was in accordance with the EBA, which allowed requests for part time set shifts for those with family responsibilities etc. The employer allowed her request (but nothing in writing). Since then Emma has fought constant battles to maintain her part time status when she has been rostered on 5 days per week and on night shifts. Emma has also received a warning for taking allegedly high levels of sick leave (actually 6 days over 12 months under the entitlement).

The examples of flexible working arrangements that are provided are useful but could be expanded to specifically include job-sharing or part time hours.

The WWC's are pleased that this entitlement is broad enough to cover carers of children under school age but would encourage that it specifically identifies grandparents, same sex partners or household members in order to reflect the demands of Australian families. The right should resemble the definition as contained in the Human Rights and Equal Opportunities Commission Act.

The WWC's advocate for Government funded paid parental leave and have made extensive submissions to the Productivity Commissions Paid Parental Leave Inquiry.

We submit that the Fair Work Bill 2008 should include provisions for Paid Parental Leave from the workplace at a minimum of the Draft Recommendations from the Productivity Commission with the optimal period for Paid Parental Leave to facilitate 12 months paid leave for parents.

Right of Entry provisions – Part 3-4

The WWC's believe that unions play a significant role in the protection and compliance of

conditions of employment for the good of the community at large.

The improved (from WorkChoices) Right of Entry provisions generally in the Bill should be retained.

There should be provisions for Right of Entry specific to TCF industries to give those concerned avenue for effective investigation of supply chains, because of the gross exploitation in this industry.

It is important that there is access to all wage and supply chain records whether there is a member or not; access to workplaces where there may not even be potential TCF Union members to allow unions access to the employer's factory or base to look at records even if there are no workers operating there. There should be no notice required for right of entry so that the employer does not have time to come up with a false set of books or to move the operations elsewhere.

Protections for all outworkers – Section 12 Page 61

A narrow definition of outworker to only TCF outworkers should be avoided.
South Australian and Queensland outworker legislation and codes are not limited completely to TCF outworkers. The definitions in the federal legislation are limited to TCF outworkers.
Consequently the protection for outworkers as a result of the Fair
Work Bill is diminished for those outside the TCF industries.

Framework of Individual Flexibility agreements in Modern Awards – Section 144

The WWC's are concerned about potential exploitation in the use and lack of scrutiny of individual flexibility in that it will be the employer's flexibility needs that will be facilitated to the detriment of employees with family responsibilities.

The WWC's would like there to be a framework for such agreements that must be provided to

employees prior to making an agreement. The framework may well be like the Small Business Fair Dismissal Code but should include information about seeking advice and remedies for breaches of the framework.

AWA's to meet the Better Off Overall Test (BOOT) or impose a sunset clause.

All existing AWA's should be subject to the BOOT if the original expiry date has been exceeded.

Without the requirement to meet the BOOT vulnerable employees will continue to work under inferior conditions.

Appointment of bargaining agents should be limited – Section 173

The provision for individual employees to nominate a bargaining agent has the potential to jeopardise the progress of dealing with systemic disadvantage for women employees if there is an unwieldy number of bargaining agents who advocate for position based bargaining. There is potential that there will be a bargaining agent for each and every employee at the table making fruitful negotiations to improve conditions on a collective basis unlikely.

The WWC's consider that individual rights should not override long overdue improvements to the most vulnerable workers. If there are workers eligible to join a union that union should be at the table and one other agent nominated and elected by employees. In addition, other than unions, a bargaining agent should enter into a clear contract of appointment with employees providing for adequate consultation and accountability to those they represent.

Cashing out sick leave and annual leave a risk to work life balance and health – Sections 100 and 101, 92 and 94

The WWC's are concerned that the ability to cash out sick leave and annual leave will impact on vulnerable workers ability to obtain adequate work life balance and maintain health due to financial pressures competing with important time for recuperation and relaxation. Workers may also be under pressure to come to work while sick and potentially impact on the Workplace Health and Safety for themselves and others.

The WWC's would prefer that an offer of reasonable overtime be made to meet properly managed workload needs. This will in turn assist employees financially without sacrificing important time on leave. There must be a definition of 'reasonable overtime' to avoid doubt.

Overall the WWC's welcome most of the content and certainly the objectives of the Fair Work Bill 2008 and look forward to being involved in the inquiry to achieve its stated objectives.

If you have any queries in regard to this submission please contact us.

Yours sincerely

Deidre Morrow
Acting Director
Queensland Working Women's Service Inc
PO Box 10554 Adelaide St
Brisbane Qld 4000
Phone 1800 621 453 (07) 3229 6312
Fax (07) 3211 1449

For and on behalf of
Sandra Dann
Director
South Australian Working Women's Centre Inc
PO Box 8066 Station Arcade
Adelaide SA 5000
Toll Free No: 1800 652 697 Work No: (08) 8410 6499
Fax No: (08) 8410 6770

Anna Davis and Rachael Uebergang
Co-Coordinators
Northern Territory Working Women's Centre
GPO Box 403
Darwin NT 0801

Toll Free No: 1800 817 055 Work No: (08) 8981 0655
Fax No: (08) 8981 0433