

3 April 2019



Tony Beech
Inquiry into Wage Theft
Private Sector Labour Relations Division
Department of Mines, Industry Regulation and
Locked Bag 14
Cloisters Square WA 6850

UnionsWA Incorporated • ABN 64 950 883 305
Level 4, 445 Hay Street, PERTH WA 6000
PO Box Z5380, St Georges Tce, PERTH WA 6831
Tel: +61 8 9328 7877 • Fax: +61 8 9328 8132
unionsyes@unionswa.com.au • www.unionswa.com.au

Dear Tony,

UnionsWA submission to Inquiry into wage theft in Western Australia

UnionsWA is the governing peak body of the trade union movement in Western Australia, and the Western Australian Branch of the Australian Council of Trade Unions (ACTU). As a peak body we are dedicated to strengthening WA unions through co-operation and co-ordination on campaigning and common industrial matters. UnionsWA represents around 30 affiliate unions, who in turn represent approximately 140,000 Western Australian workers.

UnionsWA thanks the inquiry for the opportunity to make a submission on wage theft in WA. Broadly speaking, WA unions are of the view that wage theft is widespread because workers' representatives have very limited rights of entry to inspect pay records or access workers in their workplaces who are vulnerable to being ripped off.

These two issues combined mean that some employers are breaking our laws because they know they can get away with it. This is not just affecting working people, but it is hurting employers who are following the law.

Therefore, while unions are supportive of better resources, and greater powers, for industrial relations regulators, it is ultimately the independent organisation of workers themselves that will make the greatest contribution to stamping out the scourge of wage theft.

Wage theft, is not just an issue of justice, it is an economic problem. In the minutes of the 5 March Reserve Bank of Australia Monetary Policy Decision, the Board observed that¹

Consumption was expected to have contributed more to growth in the December quarter than in the September quarter, when consumption growth had been soft. Consumer sentiment had been broadly stable, supported by ongoing strength in the labour market, but the momentum in consumption growth had remained a key source of uncertainty given its variability over recent quarters.

There are many explanations given about why consumption growth has been so sluggish in Australia, however the fact that it is so easy for businesses to avoid paying the wages that they are legally

¹ Minutes of the Monetary Policy Meeting of the Reserve Bank Board (5 March 2019)
<https://www.rba.gov.au/monetary-policy/rba-board-minutes/2019/2019-03-05.html>

required to pay, must play a role in restraining the spending of poorer households, which are particularly vulnerable to the negative impacts of wage theft. Poorer families need to spend all their income to survive and much of their expenditure goes towards buying locally produced services and goods, like rent, utilities and food. This boosts demand and creates income for other people in the community who in turn spend their incomes. If low income workers in these households are having even their relatively low wages stolen, this has a negative impact on the broader community as well as those workers.

UnionsWA has undertaken a survey of union members and supporters in the WA community in order to assess the extent of wage theft, and find examples to provide the inquiry with a comprehensive sense of the problem in WA. We can say that, even using a relatively simple online survey tool, we have been struck by how easy it is to find cases of wage theft. Very often the people telling their stories had not even considered that what had happened to them was 'theft'. Rather they considered it just a normal part of being in the contemporary Australian workforce.

The cases that have been brought to UnionsWA cover a variety of example about what constitutes wage theft. They do not just involve people being paid below the legal minimums for their hourly wage. They also include:

- People being required to work beyond their standard hours, such that those extra hours become in effect their regular hours
- People not being paid their correct superannuation entitlement, or indeed their full superannuation at all
- People being underpaid allowances that they would otherwise be entitled to
- People being required to work for less than their minimum shift times

A common theme of most of these stories is anxiety and outright fear. Anxiety because people are concerned to maintain a regular income from their employment, even if they are a victim of theft. Fear, because employers will often use harassment, bullying, and other threats to ensure that their wage theft business practice continues.

UnionsWA have included some examples of wage theft in the body of our main submission, however we have striven to keep these stories anonymous given the fears of the people who have approached us with their stories. Therefore we shall also provide the Inquiry with an Appendix containing more details of the examples that have been provided to us. We would like that section of our submission to remain unpublished.

For the remainder of this submission we shall address the inquiry terms of reference, and make recommendations as appropriate under those headings.

Responding to the Terms of Reference

1. Whether there is evidence of wage theft occurring in Western Australia, and the various forms wage theft may take.

UnionsWA, and the ACTU, have been critical of many of the activities and practices of the Fair Work Ombudsman (FWO). It is an inadequately funded organisation with limited powers, and is frequently far too indulgent of employers who have been ripping off workers.

Nevertheless it is instructive that even the FWO, when it investigates wage theft, has no trouble finding occurrences of it in WA.

For example, according to FWO's most recent *National remote and regional locations campaign report*, an audit of 130 businesses in Kimberley, Augusta-Margaret River-Busselton and Manjimup found that²

- 117 (90%) businesses were compliant with record-keeping and pay slip requirements for their staff
- 108 (83%) businesses were paying their staff correctly
- 97 (75%) businesses were compliant with all requirements
- \$38, 772 was recovered on behalf of 58 employees from 14 businesses
- 10 Formal Cautions, four Compliance Notices and two Infringement Notices were issued.

A similar audit of 148 businesses in Southern Perth found that³

- 57 (39%) businesses were not compliant with all requirements
- 39 (26%) businesses were not paying their employees correctly
- 28 (19%) businesses were not compliant with record-keeping and payslip requirements
- \$40 391 was recovered from 21 businesses for 73 employees.

A similar audit of 147 businesses in Albany and Manjimup

- 76 (52%) businesses were not compliant with all requirements
- 50 (34%) of businesses were not paying their employees correctly
- 40 (28%) businesses were not compliant with record-keeping and pay slip requirements.
- \$47 379 was recovered from 28 businesses for 147 employees.

The FWO uses anodyne terms such as 'non-compliance' to describe the practices of these businesses. Most of them will remain anonymous, and thus have no particular incentive not to go right back to offending at workers expense.

UnionsWA argues that workers need some way that they can identify businesses with a track record of wage theft, as this will provide them with the opportunity to make an informed decision as to whether they want to work for such an employer. A requirement to publically identify these businesses would create an incentive for employers not to offend, and reoffend.

Recommendation: *There should be a strong disclosure regime for businesses which have been identified as engaging in wage theft. Either they should be identified on a register of decisions specifically about wage theft, or they should be legally required to disclose that they have engaged in wage theft to both new and existing employees.*

² FWO, *National remote and regional locations campaign* (January 2019) p.12

<https://www.fairwork.gov.au/ArticleDocuments/557/national-remote-and-regional-locations-campaign-report.pdf.aspx>

³ FWO, *Western Australia - Southern Perth and Albany-Manjimup Regional Campaign Report* (April 2018) p.5

<https://www.fairwork.gov.au/reports/western-australia-southern-perth-and-albany-manjimup-regional-campaign-report/default>

As discussed previously in this submission, UnionsWA argues that wage theft should not be restricted to a narrow definition, with varieties of wage theft simply classified as 'non-compliance'. Examples of wage theft with which we have been provided include:

A restaurant which pays

... [a] flat rate for everyone ,no penalty on weekends and I was getting paid basic pay in the industry without any penalty and more often the head chef removes couple of hours from every week saying you don't deserve to get this many hours ..

Chefs and kitchen hands have same pay rate though their work structure and job responsibilities are different.

Companies which mislead about legal entitlements

For example, "training required for a start on the project will be unpaid" despite the EBA stating clearly that it is paid.

A company that skimmed on paying superannuation, which folded anyway, with the workers discovering

... only that one quarterly payment had been made.

Companies which compel employees to work unpaid hours

Working in a Call Centre environment, there will be times that you are on a call that runs past your rostered finish time. This is a common occurrence in all Call Centres and something that you need to be aware of.

Just like there is an expectation that you are logged on and ready to go at the start of your shift time, it is expected that you are ready and available to take calls up until the end of your scheduled shift. If you are on a call that runs past your finish time, you must service your Customer until they have finished their enquiry. Transferring the call midway to another operator is not acceptable.

Recommendation: *That wage theft should be defined broadly, such that companies engaging in various deceptive and exploitative practices cannot escape being found to have engaged in wage theft.*

2. *What are the reasons wage theft is occurring, including whether it has become the business model for some organisations.*

While there has been no comprehensive study of the incidence and impact of wage theft in Western Australia, such studies have been carried out in other parts of Australia. In 2017 Unions NSW carried out an audit of job advertisements on Chinese, Korean and Spanish language websites, which found that '78% of businesses advertised rates of pay below the minimum Award wage'.⁴ The McKell Institute

⁴ UnionsNSW, Lighting up the Black Market: enforcing minimum wages (July 2017) p.2
<http://www.wagethieves.com.au/wp/wp-content/uploads/2017/07/Unions-NSW-Wage-Theft-Lighting-Up-The-Black-Market.pdf>

has carried out surveys in Queensland and South Australia.⁵ In assessing why wage theft is occurring, the ACTU concluded in its submission to the Inquiry into wage theft in Queensland that⁶

The current approach to redressing worker underpayment and Fair Work Act protections are not working. The system relies heavily on individuals reporting underpayments. There is no recognition of how difficult and dangerous it is to take this first step. Many workers are scared to come forward with a complaint.

Some industry and legal structures normalise and perpetuate underpayment. The FWO website points to a convoluted and intimidating process including mediation and “self help” as the typical response to a report on underpayment. Compare this to ATO practices where tax avoidance is reported. There is a flourishing culture of underpayments in some sections of the workforce where businesses ignore workplace law.

Employers know the chances of being caught engaging in wage theft are low because:

- unions do not have sufficient powers to check breaches of workplace laws
- many workers are in a weak position to ask for decent wages (i.e., they are casual or temporary visa workers, labour hire or sham contracts)
- the protections for workers from adverse action are weak. That is, employers just have to show they had some other non-prohibited reason for taking action against a worker

One worker told us that he had worked for a company ‘every weekend for years, and only relatively recently was paid penalty rates’.

Recently I approached them over my missing hours, I was offered cash in hand, less than what I was supposed to get, when I informed them I contacted FairWork over the issue, taken off the roster, when I pressed them on the issue, I was terminated. I can't even afford a loaf of bread, I have no option to go on Centrelink, and the job market means I'll be unemployed for a long time.

Given the power that the employer has in the above situation, it is no surprise that the theft of workers’ wages and superannuation has becoming a business model. This is impacting entire industries, as businesses from celebrity chefs to multinational pizza chains steal workers’ wages.

It’s too hard for working people to recover their stolen wages. Many impacted workers are in highly vulnerable positions, and speaking out could see them punished, or lose their job. Expecting underpaid workers to launch their own legal proceedings is deeply unfair and unrealistic.

⁵ The McKell Institute, *Wage Theft, Economic Distress: The impact of wage theft on Queensland's Economy & Workers* (November 2018) <https://mckellinstitute.org.au/research/reports/wage-theft-economic-distress/>; *The Economic Impact of Wage Theft in South Australia* (March 2019) <https://mckellinstitute.org.au/research/reports/wage-theft-in-south-australia/>; *Ending Wage Theft: Eradicating underpayment in the Australian workplace* (March 2019) <https://mckellinstitute.org.au/research/reports/ending-wage-theft/>

⁶ ACTU, *Wage Theft: The exploitation of workers is widespread and has become a business model* (August 2018) p.1 <https://www.actu.org.au/our-work/submissions/2018/wage-theft-the-exploitation-of-workers-is-widespread-and-has-become-a-business-model>

Working people need their representatives to be able to check that their rights are being respected and their entitlements are being properly paid. That requires their representatives to be able to talk to the workers and inspect the relevant work records.

Recommendation: *the right of workers representatives to uphold rights and inspect records should be positively affirmed and protected by Australian industrial law. The current Fair Work Act does not adhere to ILO standards on Right of Entry. The regime of the WA Industrial Relations Act is far better and should in no way be ‘watered down’ to make it harder for unions to exercise. Rather it should be improved to make union access easier.*

3. *What is the impact of wage theft on workers, businesses which are compliant with employment laws, and the Western Australian community and economy?*

McKell Institute’s analysis shows the detrimental impact on the broader business community that wage theft has. The impact on affected individuals is clear, as has been made evident in this report so far. But well-intentioned, risk-taking, compliant business owners should be concerned by the high prevalence of wage theft, and actively engaged in bringing it to an end.

When a considerable number of employers fail to comply with the wage laws as written, they are engaging in anti-competitive behaviour that threatens the viability of their fully compliant competitors. Not only is such a practice anti-competitive and unfair, it is damaging to the economy. Additionally, by not fully complying with their obligations, employers engaging in wage theft are actively suppressing the purchasing power of their workers. This has a ripple effect throughout the consumer economy.

The Bankwest Curtin Economics Centre’s January 2019 newsletter found that⁷

Household consumption accounts for a 42% share of the State economy, so stronger growth in this indicator is critical to overall economic growth and employment creation.

The drop in household disposable income presented over the last two years is well and truly making its way into household consumption growth in WA, with the latter being effectively zero in the quarter to September 2018.

As mentioned previously in this submission, given the importance of maintaining and lifting household consumption for the WA economy, it is dangerous to allow a situation to continue in which workplace regulators have virtually no power to stop wage theft or theft of workers’ superannuation by unscrupulous employers. This is not just affecting working people, but it is hurting all the good employers who are following the law.

Recommendation: *Working people should be able to access a fair system, to get back stolen wages, and superannuation. When an employer breaks an agreement, or an award right, or acts unfairly, we need an umpire who can enforce the rules.*

⁷ Bankwest Curtin Economics Centre Newsletter (January 2019) p.20 <https://bcec.edu.au/publications/bcec-newsletter-7-summer-2019/>

4. *Whether wage theft is more prevalent in particular industries, occupations, forms of employment/engagement or parts of the State.*

Wage theft is theft no matter where it occurs, therefore UnionsWA supports the right of all workers to have redress – no matter their industry, occupation, or form of employment.

UnionsWA has received examples of wage theft occurring within child care, universities, local government, the not-for-profit sector, and the public sector.

Therefore, while there will be reasons for a regulator to focus on particular industries at particular times (such as retail and hospitality) governments must also ensure that workplace rights are accessible to as many workers as possible across WA.

However, there are obvious examples of particular types of workers who are more vulnerable to wage theft. Research by the Victorian Trades Hall Young Worker Centre (YWC) has found that the younger these workers are, the more vulnerable they become.⁸ They include

- Casual workers
- Temporary contract workers
- Labour hire employees
- Migrants and international students
- Tourism, retail and hospitality workers
- Workers employed on ‘probation’, or as ‘interns’

One of the responders to our survey described a situation combining a number of the above elements. They started work in a restaurant after struggling to find work for many months

For the first 3 months I was paid \$20 p/h as a ‘trial rate’. This was a flat rate. I did get penalty rates over Christmas, \$35 p/h for working Christmas Day and Boxing Day. When I finally got a pay rise, I was earning \$21 an hour on weekdays and \$23 on Sundays. This is my rate as a casual employee. I serve tables, make drinks, take payments and reservations. I should be earning at least \$24 an hour. Any employee who questions the bosses has their hours cut significantly, so I feel like I can’t bring this up. I need this job, I’m desperately applying to other roles so I can put this behind me, but I am having zero luck. I’m even training staff and supervising staff, basically shift manager but still only \$21 an hour. My work is obviously valued by my employer but they can’t bring themselves to pay me what I’m entitled to? It’s unfair and I feel so used, but also so helpless. I can’t speak up because I need the job and I can’t get out because nobody else will hire me.

Workers such as this responder have obvious difficulties in speaking up about their situations. As such, identifying workers vulnerable for wage theft cannot rely on individual complaints. Rather regulators need to be proactive in seeking out such workers, and unions need stronger rights of entry to workplaces in which wage theft is more likely to take place.

⁸ Young Workers Centre, *Young Workers Snapshot: The Great Wage Rip-Off* (May 2017) pp. https://d3n8a8pro7vhmx.cloudfront.net/victorianunions/pages/1411/attachments/original/1493954358/Young_Workers_Snapshot_The_Great_Wage_Ripoff_final.pdf?1493954358

Recommendation: *the WA government should ensure in legislation that all workers have the same rights, both to union representation, and to access the independent umpire the Industrial Relations Commission. Where there are specific categories of workers and industries that are identified as more vulnerable, workplace regulators should be proactive, and union rights of entry protected and enhanced.*

5. *Whether the current State and federal regulatory framework for dealing with wage theft is effective in combating wage theft and supporting affected workers.*

As previously stated in this submission, UnionsWA argues that the WA Industrial Relations Commission must have the power to stop employers, who rip off or treat their workers unfairly.

We also argue that wage theft is rampant because workers' representatives have very limited rights to inspect pay records or access workers through right of entry who are vulnerable to being ripped off.

These two issues combined mean that employers are breaking our laws because they know they can get away with it. The Commission needs more power to stop wage theft or theft of workers' superannuation by unscrupulous bosses. Currently it is too reliant on individual complaints.

Recovering stolen wages and superannuation is slow, complex, and expensive. Companies that steal wages and super often take a calculated risk knowing that the chances of being caught is very low, and the penalties are relatively small.

At the Commonwealth level, the Fair Work Commission is only able to resolve workplace disputes when agreements specifically empowers them to do so. A very small percentage of working people have access to these rights. We need to have a strong, independent umpire who can resolve issues quickly and fairly. As a result, too many employers just get away with unfair behaviour and working people do not have fair access to justice to enforce the rights they already have.

As one of our respondents told us about his attempts to redress a superannuation underpayment

... I went to Fair Work Ombudsman, The ATO, The Fair Work Commission, Industrial Relations, a lawyer and my local parliamentarian. All of which haven't been able or are unwilling to remedy the situation.

The YWC recommends that workplace regulators should adopt enforcement methods that are driven by proactive investigation (rather than solely complaint responsive) in areas where we know there are wage law compliance issues. They also point out that

For this to be successful and protect vulnerable workers, such investigations and audits must be unannounced to employers but well publicised once they have been carried out. Violators should be vigorously prosecuted.

The YWC also points out that

Not-for-profit actors such as community legal centres, trade unions and other community-based advocates play a vital role in supporting the legal rights of young and vulnerable workers. Pursuing underpayments through legal avenues is highly resource intensive, even for

relatively low monetary amounts. Organisations doing this work on a not-for-profit basis must be adequately compensated for securing stolen wages for workers.

An obvious source of that compensation is violating employers themselves.

Finally, the WA state government should have a fully resourced Inspectorate to act as a tough ‘cop on the beat’ to proactively ensure employers meet their obligations to workers. Education is not enough – there needs to be enforcement.

Recommendation: *that the powers of both the WA Industrial Relations Commission, and the Fair Work Commission, be increased in order to provide an effective avenue to hold employers to account. Where there are specific categories of workers and industries that are identified as more vulnerable, workplace regulators should be fully funded, empowered, and proactive, and unions and not-for-profit organisations should also be supported, in their work of combatting wage theft. Compensation for wage theft should be funded by employers as an additional penalty for their breaches of both the Fair Work Act and WA Industrial Relations Act.*

6. Whether new laws should be introduced in Western Australia to address wage theft, and if so, whether wage theft should be a criminal offence.

UnionsWA argues that wage theft should be treated with the seriousness of a criminal offence. Presently it is not being treated seriously at all

UnionsWA recognises that some complex issues arise with making wage theft part of the criminal code. There is a danger that the definition becomes too rigid, thus preventing some of broader examples of wage theft we have outlined in this submission, from being addressed. There is also an issue arising about whether a worker may wish to continue being employed by the same business despite it having engaged in wage theft.

Nevertheless, there are legal changes that could be introduced that would greatly assist in addressing wage theft in WA. For example:

- The *Interim Report* of the Ministerial Review of the State Industrial Relations System⁹ contained a discussion of the usefulness of a Reverse Onus of Proof for the contravention of a statute or industrial instrument. This would place the onus on an employer to challenge a sanction administratively imposed upon them, and could be a tool for the enforcement of industrial instruments and laws.
- The *Report of the Migrant Workers’ Taskforce*, handed down in March 2019, included proposals for required monitoring supply chains by companies and franchisors, to ensure labour abuses are not taking place. These principles could certainly include wage theft. The Report points out that¹⁰

⁹ *Interim Report* - Ministerial Review of the State Industrial Relations System (March 2019) pp.462, 475
https://www.commerce.wa.gov.au/sites/default/files/atoms/files/ministerial_review_of_the_state_industrial_relations_system_interim_report.pdf

¹⁰ Final Report of the Migrant Workers’ Taskforce (March 2019) p.104
https://docs.jobs.gov.au/system/files/doc/other/mwt_final_report.pdf

A critical objective of compliance activity should be to increase labour hire operators' (and their host organisations') perception of risk of detection and penalties for non-compliance, where they no longer see that the gains from non-compliance outweigh the risks of being caught and penalised.

- The current definition of an 'employee' in WA industrial law excludes people who work in domestic situations, and some agricultural employees who work on commission. This definition should be changed to bring WA into line with other states in Australia.
- The current 'Denied contractual benefits' jurisdiction of the WA Industrial Relations Commission should be supported, and access to it improved. Currently workers are required to bear their own legal costs, where other aspects of the Industrial Relations system are cost free. 'Denied contractual benefits' could be brought into line with the rest of the IR system. The need for workers to 'serve' their employer with a Form 3 before conciliation can commence can also be a difficulty for vulnerable workers. Access to Conciliation could be made quicker and easier in this regard.

Recommendation: *new laws in WA should be drafted to address the above proposals.*

7. Whether there are other strategies that could be implemented by the Western Australian Government, or industry stakeholders to combat wage theft.

The WA state government is currently drafting an Ethical Procurement Framework. This should also include principle that ensure only businesses with a 'clean slate' on wage theft are considered for government contracts.

As discussed above, the current definition of an 'employee' in WA industrial law excludes people who work in domestic situations, and some agricultural employees who work on commission. This should be modernised to bring WA law into line with the rest of Australia.

Workplace rights and safety training should be embedded in WA education for students Year 10 and above. This would be not just for high school students, but also for Apprentices and Trainees, and VET students more broadly. This early education at the point at which young workers are entering the workplace for the first time is pivotal in ensuring they have an understanding of how the minimum wage and employment standards, Awards and enterprise agreements apply to them, allowing them to better enforce the pay rates they are legally entitled to.

There are already such programs operating in WA that could serve as a template. The United Voice union has been participating in courses for Aged Care students in both the North and South Metro TAFEs for the last twelve months. These are targeted, Industry specific sessions aligned to training package requirements, covering matters such as

- Rights at work
- Legal issues
- Professional Development
- Addressing selection criteria for work in the industry

Recommendation: that businesses which have been found to have practiced wage theft should be excluded from benefitting from government contracts; current definition of an 'employee' in WA industrial law should be modernised; Workplace rights and safety training should be embedded in WA education.

8. Whether there are strategies and legislative change the Western Australian Government could recommend to the Federal Government to deal with wage theft in the federal jurisdiction.

As mentioned previously in this submission, the Right of Entry provisions of the WA *Industrial Relations Act* are superior to those in the *Fair Work Act*.

Working people need their representatives to be able to check that their rights are being respected and their entitlements are being properly paid. That requires their representatives to be able to talk to the workers and inspect the relevant work records. Current WA laws are better able to achieve these goals compared to current Federal laws.

The WA government could support changes to payslip content in order to improve worker and employer knowledge about wage rates. Regulation 3.46(2)(b) of the *Fair Work Act* should be amended to require that the following additional information must be specified on a payslip:

- The employee's industrial instrument inclusive of the relevant Award or agreement name
- The classification applicable to the employee under the industrial instrument (i.e. 'retail employee level 1').

The WA government could also support the establishment of a national licensing and regulation scheme for the labour hire industry. Especially given that compared to other employers, labour hire businesses carry a higher risk of being involved in wage theft, particularly via activities that breach the *Fair Work Act*. The WA government could initiate such a scheme at the state level, then advocate for a similar national scheme.

Recommendation: that the WA government should positively argue at the national level for the value of its own industrial laws as regards right of entry, and addressing wage theft; it should also support payslip reform; and labour hire licencing.

9. Other matters incidental or relevant to the Inquirer's consideration of the preceding terms of reference.

Existing penalties for contraventions of minimum wages or award rates are not high enough to deter illegal behaviour. The savings employers derive from non-compliance with wage laws outweigh the costs that may arise from the current civil penalties for such breaches. Employers are not being deterred from choosing to pay below legal rates under the current penalties structure and in order to arrest the trend of non-compliance, the penalties must be increased with this purpose in mind.

The Federal Labor Party has announced a policy of fining employers three times the amount they take from their workers if they are caught paying workers less than they are legally entitled to. This will be a big deterrent to stop employers engaging in wage theft.

Federal Labor have also announced they will give the power to workers and their unions to get their super back when employers fail to pay it. At the moment the only option is to rely on the Tax Office. Giving workers the option of getting it back through the Fair Work Commission will make it quicker and easier to recoup stolen retirement savings.

Recommendation: that the WA government adopt similar measures in the state industrial relations system, as Federal Labor has proposed. They should also support them at the national level.

Thank you for the opportunity to make these representations on wage theft. Please contact me on 08 9328 7877 or MHammat@unionswa.com.au if you would like to discuss matters further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Meredith Hammat', written in a cursive style.

Meredith Hammat

Secretary