

National Cleaning Services Campaign 2010-11

Report June 2011

Prepared by the Fair Work Ombudsman's Targeted Campaigns Unit



Australian Government

Fair Work
OMBUDSMAN

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About the Fair Work Ombudsman

The Fair Work Ombudsman is an independent statutory agency created by the *Fair Work Act 2009 (the Act)* on 1 July 2009.

Our vision is fair Australian workplaces and our mission is to work with Australians to educate, promote fairness and ensure justice in the workplace. We promote harmonious, productive and cooperative workplace relations and ensure compliance with Australia's workplace laws by:

- offering people a single point of contact for them to receive accurate and timely advice and information about Australia's workplace relations system
- educating people working in Australia about their workplace rights and obligations
- investigating complaints or suspected contraventions of workplace laws, awards and agreements
- litigating to enforce workplace laws and to deter people from not complying with their workplace responsibilities.

Education and compliance campaigns that focus on specific industries are a pro-active measure we use to achieve compliance with national workplace laws. They are also effective in recovering employee entitlements, particularly when the campaign targets high risk areas and industries that employ vulnerable workers.

Education and compliance campaigns have a strong emphasis on engagement with relevant industry associations and unions. This approach provides industry-specific knowledge that shapes the educational activities we undertake and shares information through industry association and union communication channels.

This report covers the background, methodology and results of the National Cleaning Services Campaign 2011-2012.

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Summary

The Australian cleaning services sector comprises approximately 15,000 businesses ranging from sole traders to large national public companies. According to the Australian Bureau of Statistics (Labour Market statistics, April 2010) the cleaning industry had a workforce of 273,700 individuals, equating to 2.5% of the Australian workforce.

Analysis of complaints received by Fair Work Ombudsman between July 2009 and April 2010 revealed that the Building and Cleaning Services industry was ranked third¹ in terms of the total number of complaints received.

The Fair Work Ombudsman conducted the *National Cleaning Services Campaign* (the campaign) between September 2010 and May 2011. The campaign provided the opportunity to educate the industry about the changes introduced by the *Fair Work Act 2009* (the Act), *Cleaning Services Award 2010* (the award), the National Employment Standards (NES), and where to access further information regarding workplace obligations.

Following an education phase which covered more than 15,000 cleaning entities on the Australian Business Register, the Fair Work Ombudsman selected 366 entities for audit. At 3 June 2011 inspectors had finalised 315 wage and conditions audits, revealing a non-compliance level of 37.1% (117 employers). Another 51 wage and condition audits are yet to be finalised because of ongoing investigations.

Of the 117 non-compliant employers, 53% (62 employers) had monetary contraventions, 36% (42 employers) had non monetary contraventions and 11% (13 employers) had both monetary and non monetary contraventions.

The common contraventions identified related to underpayment of hourly rates of pay, inadequate record keeping practices and minimum shift engagements.

Of the finalised audits, inspectors have recovered a total of \$242,451 for 621 employees.

In the course of the audit, we identified and referred some entities requiring further examination in regard to their contract for service arrangements. These entities were referred to the Fair Work Ombudsman's Sham Contracting Operational Intervention project to ensure a consistent and comprehensive approach to investigating potential sham contracting issues.

Background

The Fair Work Ombudsman (FWO) identified the cleaning services industry as a priority for an education and compliance campaign in 2010 for the following reasons:

- We had received a high number of complaints from this industry. In the period between March 2006 and April 2010, the fourth highest number of complaints received came from the cleaning services industry. In the period from July 2009 to April 2010, it generated the third highest level of complaints.
- Between March 2006 and May 2010 we prosecuted five cleaning services businesses. These prosecutions resulted in \$375, 590 in court-awarded penalties against employers and \$375, 658 recovered on behalf of underpaid employees.
- A pilot cleaning industry campaign in NSW conducted in June 2009, identified issues including allegations of cash in hand payments, workers being reluctant to speak with Fair Work Inspectors and the possibility of sham contracting.

In 2009, the Building Services Contractors' Association of Australia (BSCAA) indicated it was willing to work in collaboration with the FWO on a national cleaning services education and compliance campaign. It expressed concerns about reports of some contractors failing to comply with workplace relations laws and undercutting prices of competitors by up to 20%.

¹ Analysis period being from 1 July 2009 to 30 April 2010

Similar concerns were subsequently expressed by United Voice (formerly known as the Liquor, Hospitality and Miscellaneous Union), which raised the issue of potential exploitation of vulnerable workers. We were pleased to have the support and assistance of both BSCAA and United Voice in promoting the national campaign.

Case Study: Unconventional Working Arrangements

Employer A was selected for audit as part of the 2009 NSW Cleaning Campaign Pilot. The audit identified that employees were engaged in continuous shifts of four hours. The employer advised that he paid his staff for the first three hours and had entered into an arrangement with another company, Employer B, who paid the workers for the fourth and any additional hours.

Our Fair Work Inspectors became suspicious of the implications of this unconventional arrangement. They decided to conduct further investigation into the matter and issued both employers with a statutory notice seeking time and wage records for assessment.

Whilst Employer A was able to produce documents, Employer B did not keep a record of wages paid to employees. The Fair Work Inspectors attempted to conduct interviews with the employees of both employers to obtain an understanding of the working relationship between the employers.

Unfortunately many employees declined our invitation to participate frightened that they would lose their jobs if they did so. However, from the information provided by those employees and former employees who chose to participate in the interviews it became evident that Employer B was paying employees in cash and at a rate less than the minimum hourly rate.

Due to the seriousness of the contraventions the Fair Work Ombudsman will proceed with enforcement action against both employers.

Campaign aim and objectives

The aim of the National Cleaning Services Campaign was for the FWO to promote compliance with the award, the *Act*, the *Fair Work Regulations 2009 (the Regulations)*, and NES.

The specific objectives of the campaign were to:

- Collaborate with BSCAA and United Voice and to engage with other relevant stakeholders in promoting the campaign and enhancing awareness of Commonwealth workplace relations laws.
- Provide the contract cleaning services industry across Australia with access to educational material specifically designed to assist employers meet their obligations under federal legislation and to promote the role of the FWO.
- Provide workers in the cleaning industry with information about their rights.
- Undertake education visits to those employers transitioning to the federal system.
- Audit the level of compliance of a sample number of employers in relation to minimum wages and entitlements including penalty rates and examine their contract for service arrangements.

Scope

This campaign targeted employers and employees in the contract cleaning services industry.

Section 4.2 of the *Cleaning Services Industry Award 2010* provides “*the contract cleaning industry means the business of providing cleaning services under contract and includes:*

- (a) cleaning (including event cleaning, trolley collection and hygiene and pollution control but excluding trolley collecting covered by the General Retail Industry Award); and*
- (b) minor property maintenance which is peripheral to cleaning.'*

A review of the ANZSIC database showed that these services in the award are incorporated in 'Building and Other Cleaning Services' category (ANZSIC 7311). At the time of the campaign the ABR database identified 15,797 entities under ANZSIC 7311 Australia- wide.

Stakeholder Engagement

During the planning phase of the campaign, the FWO collaborated with BSCAA and United Voice. We also communicated with other key stakeholders, including:

- The Australian Cleaning Contractors of Australia (ACCA)
- The Property Council of Australia
- The Facility Management Association of Australia Ltd
- The Shopping Centre Council of Australia, and
- "In clean' magazine

The purpose of engaging with these stakeholders was to make them aware of the campaign, to identify the key issues that were facing the cleaning services industry and to seek their assistance in promoting the industry specific website during the educational phase of the campaign.

It was pleasing therefore that the stakeholders listed above provided support to the campaign and agreed to promote the dedicated industry website via their networks.

There was a consistent message of concern from United Voice, BSCAA and ACCA that contractors in the industry trying to do the right thing were allegedly being undercut in the pricing of work by non-compliant contractors - and they hoped that FWO would address this through the campaign.

Additional stakeholders were contacted by letter. For full details of stakeholders contacted, please see Appendix A.

Method

Information and Awareness Phase

The information and awareness phase of the campaign ran from early September to the end of November 2010. During this phase the FWO aimed to communicate with as many employers and employees in the cleaning services industry as possible to direct them to our dedicated webpage for the cleaning industry www.fairwork.gov.au/cleaning, our contact centre and live chat facility.

Employers

Attempts were made to reach employers in the industry by a variety of communication channels:

- Distributing an email with a link to the FWO's online resources to the 27% of cleaning services industry entities on the ABR database with email addresses.
- Mailing a flyer containing details of the online employer resources to the remaining 73% of entities.
- Using the industry stakeholder networks to distribute information, namely Facilities Management Australia; Property Council of Australia; Shopping Centre Council of Australia, BSCAA, ACCA and the LHMU.
- Publishing articles in InClean Magazine, and
- Issuing a Media Release.

Following the email distribution and flyer mail-out, the FWO's dedicated cleaning industry web page received 3702 visits, peaking in October at 1722 visits.

In addition, some employers transitioning from the state industrial relations system in NSW, Queensland and South Australia received educational visits. The table below details the number of educational visits made to employers within the cleaning industry.

State	Number of visits completed (1 September - 30 November 2010)
NSW	46
QLD	51
SA	28
Total	125

Employees

Information from the *2009 NSW Cleaning Industry Pilot Program* and from United Voice suggested that a large number of workers in the cleaning industry are international students. Consequently, the agency implemented a communication strategy targeting international students in the cleaning industry to direct them to the dedicated online resources at www.fairwork.gov.au/internationalstudents.

The strategy involved the following initiatives:

- A multi-lingual postcard with the message 'Know your workplace rights' distributed nationwide to 850 universities, private colleges and English language colleges. Subsequently, more than 3000 additional postcards were requested by universities, private colleges and English language centres.
- Distribution of free coffee cups in 22 university cafes in Sydney, Melbourne and Brisbane. Approximately 42,000 cups featuring a Quick Response (QR) code were distributed. When a mobile phone scans the QR code an internet page appears asking if the student would like to register to receive more information about their workplace rights from FWO. Once registered, an automated email was delivered with links to translated information available at www.fairwork.gov.au.
- Actively encouraging universities, international student associations and colleges to forward information regarding workplace rights in Australia to their students/members. This was done via an email consistent with the postcard graphics, featuring translated information and encouraging students to visit the online resources for further information.
- A media release translated in Arabic, Chinese, Hindi, Korean, Portuguese, Serbian, Spanish and Thai.

Audit Phase

In November 2010 the FWO selected a sample number of employers across Australia for a compliance audit. The purpose of the audits was to review both wage and condition records and contract for service arrangements.

We wrote to 732 entities advising them of their selection for audit. The notification letter advised that they were required to provide time and wage records and contractor records for examination. The letter also advised that Fair Work Inspectors would be making field visits throughout the campaign.

Once records were received they were assessed to ensure compliance with obligations under the *Act, Regulations* and award. Where employers were found to be compliant, they were notified in writing of the outcome. Where employers were suspected of contravening the legislation or award in relation to wages and conditions, inspectors undertook further investigation and at the conclusion, sent a letter advising them of the findings and what action needed to be taken.

Case study: Labour Hire Arrangements Investigated

The Fair Work Ombudsman included Company C for an audit as concerns had been reported to us by other businesses about the claims made in material promoting Company C's labour hire services.

The benefits that were being promoted included that by using Company C's labour hire arrangements, businesses could avoid paying entitlements which would otherwise apply if they were to employ staff themselves.

Company C has an agreement whereby they do not have to pay labour hire staff loadings and penalties as their agreement doesn't allow for such entitlements. As the agreement does not contain any penalty rates workers only receive the minimum rates of pay in accordance with the Cleaning Services Award 2010 regardless of the shifts that they work.

We are continuing with our investigation into to the legitimacy of the employment arrangements used by Company C.

Businesses offering contracts for service to individuals also had their contracts reviewed. The original plan was that where further information was required to determine the contractual relationship between business owners and subcontractors, Fair Work Inspectors would meet with employers and undertake an 'employee versus contractor' test. In the case that there was reasonable suspicion that the enterprise had engaged in 'sham contracting' arrangements the audit would be escalated for further investigation.

However, in March 2011, this methodology changed as a result of the introduction of the FWO's Sham Contracting Operational Intervention. It was agreed that the contractors in this campaign identified as requiring further examination would be referred to the Sham Contracting Operational Intervention and the employer would be notified of this transfer in writing.

Sham Contracting Operational Intervention

The Fair Work Ombudsman's Sham Contracting Operational Intervention aims to:

- *educate business on the differences between an employee and contractor relationship*
- *assess the extent of sham contracting in various industries selected for inclusion in the intervention.*

The cleaning industry was flagged as high risk in terms of sham contracting. Therefore those businesses audited as part of the National Cleaning Services Campaign requiring further examination of their contract for service arrangements were referred into the Sham Contracting Operational Intervention. A total of 63 employers were referred into the Sham Contracting Operational Intervention.

The campaign identified a number of contract arrangements, particularly in NSW, which required further examination and which were consequently referred to the Sham Contracting Operational Intervention.

Sham Contracting Operational Intervention: Who was referred?

Business D employs cleaners and also engages contractors to perform cleaning duties. As requested in the audit notification letter, Business D provided the Fair Work Ombudsman with the records requested for the audit.

Our Fair Work Inspectors examined the time & wage records and found the business to be compliant with its employee obligations.

On reviewing the limited contractor records provided, our Fair Work Inspectors decided a further examination of the contractual relationship was warranted. It was found that the contractors were cleaning the same premises as Business D's employees and were being paid a slightly lower rate than the employees.

Based on this finding and the fact that the paper work between the contractor and sub contractors was very minimal, the Fair Work Inspectors referred the audit to the Sham Contracting Operational Intervention for further investigation.

Audit status

Inspectors initially reviewed a total of 732 entities from the ABR database for an Australia-wide audit. After eliminating those entities that were unsuitable for audit (i.e. no longer trading or had no employees/contractors), inspectors identified 393 entities suitable for audit.

Of the 393 entities:

- 366 entities had either employees only or both employees and contractual arrangements.
- 27 entities had contractual arrangements only.

We referred a total of 63 entities that warranted their contractual arrangements being subjected to further investigation to the Sham Contracting Operational Intervention (a Sham Contracting Operational Intervention report will be published at a later date).

Audit findings

Please note that these results were collated on 3 June 2011. As some investigations are ongoing, some findings, particularly the amount of money recovered on behalf of employees, may vary in the future.

The remainder of this report focuses on the audit of wages and conditions of the 366 entities that had employees. To date, the FWO has finalised 315 audits and found 198 (62.9%) employers to be compliant whilst 117 (37.1%) have been found to have contravened the Act. Note - there are 51 audits where investigations are ongoing, and the findings in these cases may affect the overall compliance rate.

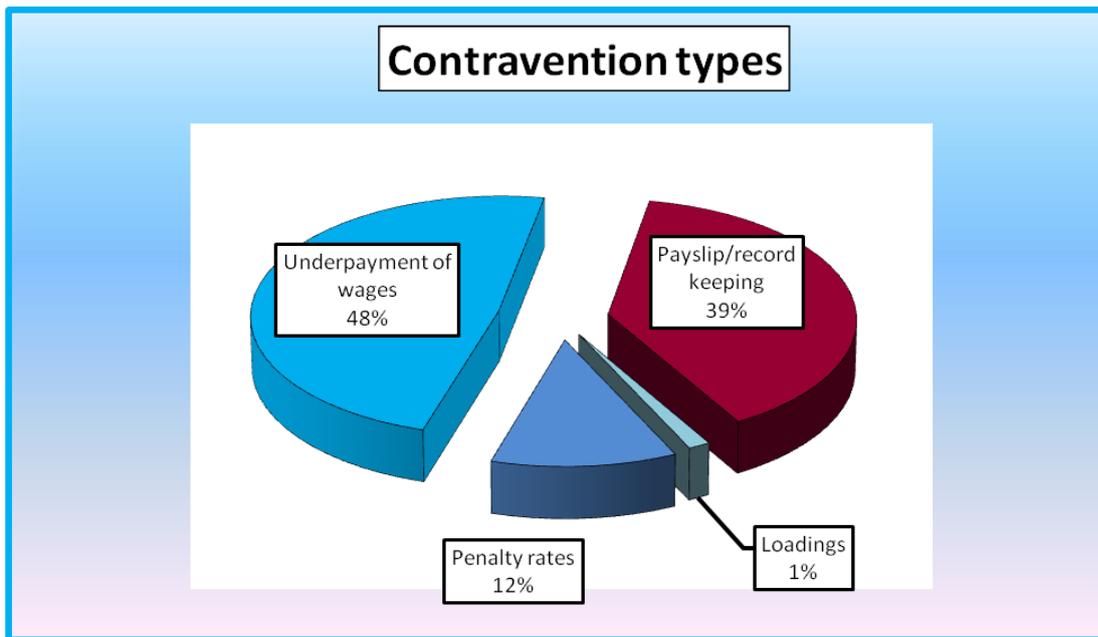
Table 2: Outcome of wage and condition audits	
Audits finalised	315
• Employers compliant	198 (62.9%)
• Employers in contravention	117 (37.1%)
Audits remain ongoing	51
Recoveries	
Money Recovered to date	\$242,451
Employees paid	621

The table below provides an overview of the outcome of audits by state.

Table 3 – Outcome of audits by state – June 2011

	ACT	NSW	VIC	QLD	WA	SA	TAS	NT	TOTAL
Audits finalised	18	51	43	89	50	51	7	6	315
Employers compliant	9 (50%)	25 (49%)	24 (56%)	62 (70%)	28 (56%)	42 (82%)	4 (57%)	4 (67%)	198 (63%)
Employers found to be in contravention	9 (50%)	26 (51%)	19 (44%)	27 (30%)	22 (44%)	9 (18%)	3 (43%)	2 (33%)	117 (37%)
Ongoing investigations	4	18	7	-	1	12	2	2	51

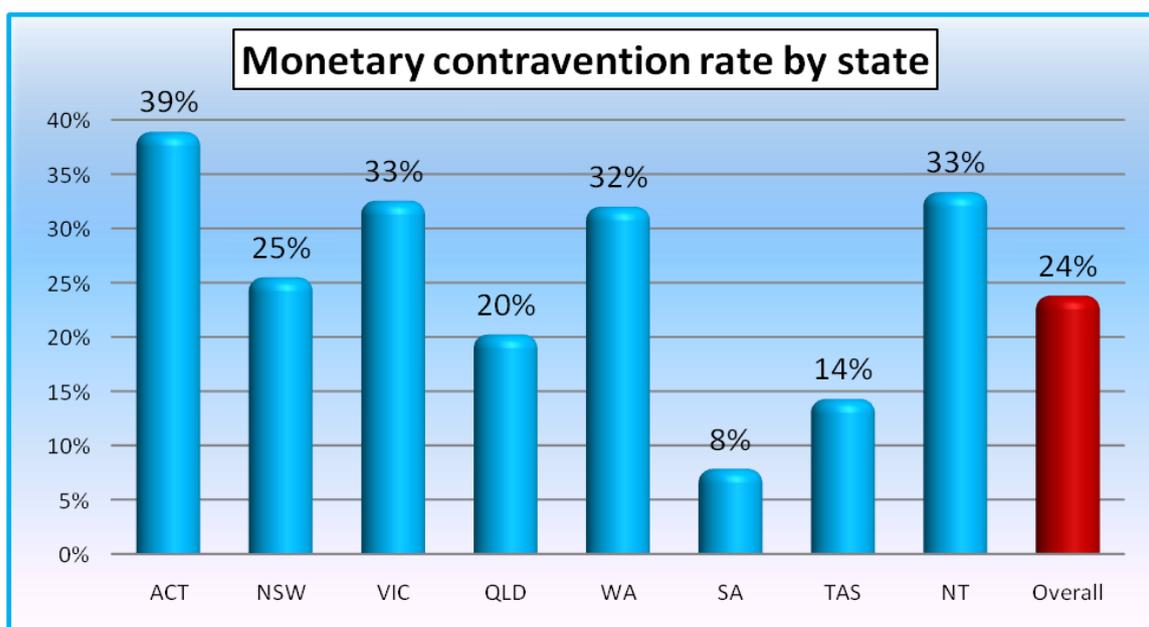
The chart below illustrates the types of contraventions identified as part of the wages and conditions audit. Overall, 48% of the contraventions related to the underpayment of wages, 12% to penalty rates and 1% related to shift loadings. A further 39% of contraventions related to payslip/record keeping requirements.



An analysis of the types of contraventions recorded by state show that 53% of the contraventions identified related to underpayments.

Table 4 – Contraventions identified by state									
	ACT	NSW	VIC	QLD	WA	SA	TAS	NT	Total
Employers with monetary contraventions	7	13	13	9	15	4	-	1	62 (53%)
Employers with non-monetary contraventions	2	13	5	9	6	5	2	-	42 (36%)
Employers with both monetary and non-monetary contraventions	-	-	1	9	1	-	1	1	13 (11%)
Totals	9	26	19	27	22	9	3	2	117

To date, we have recovered a total of \$242,451 for 621 workers as a result of this campaign. As there are continuing investigations and a number of employers subject to agreed payment plans, this amount may increase. A summary of monetary contravention rates recorded against finalised audits in each state is shown below:



An analysis of money recovered by state shows that New South Wales accounted for 27% (\$63,618) of money recovered, followed by Victoria with 26% (\$63,322) of total recoveries. Queensland has the highest number of employees who were underpaid, a total of 209 employees received back pay as a result of this campaign.

Table 4 - Money recovered by state – as at June 2011

	ACT	NSW	VIC	QLD	WA	SA	TAS	NT	TOTAL
Money recovered	\$1,866	\$63,618	\$63,322	\$38,031	\$57,194	\$17,418	\$520	\$481	\$242,451 (rounded)
Number of employees	11	105	72	209	92	55	2	75	621

Other findings by state

New South Wales/Australian Capital Territory

Some employers in NSW/ACT advised that they welcomed the industry campaign as they had difficulty understanding the award, in particular, Schedules A and B, and therefore were looking forward to having their records assessed for compliance. Inspectors found employers had numerous questions regarding their obligations and genuinely wanted to make sure that their business was compliant.

The campaign disclosed a number of cases where employers indicated they were not aware of the referral of industrial relations power from the State to the Commonwealth Government and consequently changes to their obligations under the modern award and the NES. The majority of these employers operate small or medium sized business in regional NSW.

Regarding the complexion of the NSW/ACT cleaning industry, we found the larger cleaning companies operated in and around Sydney and medium and small sized businesses operating within the regions. The majority of businesses both employed employees and engaged contractors. There were only a few businesses which solely engaged contractors to undertake cleaning duties. Generally we found that the industry employs a number of individuals from non-English speaking backgrounds. A total of 42 NSW cleaning companies have had their contractor records referred to the Sham Contracting Operational Intervention for further assessment.

The common contraventions identified related to non payment of penalty rates, inadequate record keeping practices, minimum shift engagement and non-payment of toilet cleaning allowance.

Flat rates of pay were also common amongst small and medium sized businesses, however as the flat rates were significantly higher than the basic minimum rate, in most cases employees were not losing money overall for hours they worked which attracted penalty or loaded rates of pay.

Case study: Knowing your obligations

Victoria

In Victoria the level of knowledge regarding the award and the *Act* significantly varied amongst businesses. Generally inspectors found the knowledge of small business employers' to be significantly less than their larger employer counterparts. A number of employers advised that they were not coping well with Modern Award pay rate transitional arrangements.

It was noted that employers predominantly employed casual and part-time staff. On a few occasions, employers advised of the financial difficulty associated with paying part-time employees under the award. The audit also uncovered a number of Victorian businesses engaged in sub-contracting. A total of eight Victorian cleaning companies have had their contractor records referred to the Sham Contracting Operational Intervention for further assessment.

Common contraventions identified in the Victorian cleaning industry related to the underpayment of wages. Based on feedback provided by employers, they have valued the audit and now have a better understanding of their obligations.

Queensland

Uncertainty regarding transitional rates of pay and minimum hours of engagement was a recurring theme amongst Queensland employers. Inspectors found many employers who advised they were unclear about what they should be paying their staff. However, they were not necessarily underpaying their staff overall, as they were paying them a significantly higher base rate of pay. Monetary contraventions do not accurately reflect the level of award knowledge amongst employers.

A handful of employers were found to be underpaying the minimum hourly rate, conceding that they paid their staff what they could afford as per the cleaning contracts they had tendered for.

Other common contraventions identified included employers not keeping records of hours worked, rather relying on sign in and out times recorded at the premises where the cleaners performed cleaning duties.

Of interest a high proportion of employers found in contravention operated outside of Brisbane in areas including Cairns, Gladstone and Gympie.

Of the businesses audited the majority solely employed employees.

Case Study: Part time or Casual?

Employer F operates a small cleaning business. After the Fair Work Inspector had assessed the employer's records and spoken to him about the campaign it became clear that the employer was unaware of his obligations.

The employer was paying staff a flat rate of pay and believed that he could make any agreement with his employees that suited him unaware of the national system workplace regulatory system.

The Fair Work Inspector had several meetings with the employer and discussed his obligations under the award and Act. He was also required to explain to the employer the difference between part time and casual employment.

The Fair Work Inspector then asked the employer to decide whether his staff were part time or casuals as per the award. Based on the information provided, the Fair Work Inspector completed a thorough examination of the wages paid to staff.

It was found that for those employees determined to be part-time, there were under payments in terms of part time loadings under the award, and a failure to provide annual and personal leave entitlements. For those employees determined to be casual, there were underpayments in terms of casual loadings.

The employer has sought further advice regarding status of employment obligations and is in the process of making the necessary back-payments.

Western Australia

In Western Australia, inspectors found a number of small employers to have poor record-keeping practices and who were also unaware of the existence of the modern award. Flat rates of pay were common, in some cases the flat rates fell below the minimum hourly rate.

Some industry employers and employees, because of their non-English speaking background, had difficulty understanding their workplace obligations and entitlements under Australian workplace laws.

Most of workers in WA were found to be employees as opposed to contractors. The audit revealed that the majority of the underpayments identified were from regional employers as opposed to Perth-based employers.

South Australia/Northern Territory

Inspectors found South Australian and Northern Territory employers to be well informed of their award obligations. However, the non-recording of meal breaks was a common contravention amongst employers.

A number of the businesses audited in South Australia and the Northern Territory are considered to be small and medium sized businesses mainly employing part time staff.

During field visits, inspectors found employers to be very receptive and appreciative of the information provided. From discussions with these employers, many of them advised that they would like to receive regular notification from FWO regarding changes to the *Act* and the award.

Case study: Sourcing Information

Tasmania

In Tasmania, we targeted a small number of small, medium and large cleaning businesses for audit. Many of the businesses audited preferred to engage casual employees as opposed to part time employees.

It was encouraging to find that most of the contraventions identified were relatively minor, mainly relating to record keeping and payslips. There were only two instances where inspectors identified underpayment contraventions. All employers indicated they wanted to do the right thing in terms of compliance, with many of the contraventions resulting from employers not completely understanding their obligations. The four employers found to be in contraventions have committed to voluntarily rectifying their contraventions.

Prior to the audit phase of the campaign, we worked closely with United Voice in Tasmania to inform their members of their workplace obligations. As United Voice have a high number of members from the Tasmanian cleaning industry, most employers were well informed of their obligations. Membership to the union has most likely attributed to the low number and minor types of contraventions identified.

Concluding remarks

The findings of this campaign have been informative in identifying trends and patterns in the cleaning industry. The cleaning industry ranks highly in terms of the number of complaints the agency receives. Further intelligence obtained during this campaign suggests that many employers in the cleaning industry still need assistance in understanding their obligations under Australian workplace laws.

A common theme to emerge was that a number of small to medium sized employers are paying their staff a so-called 'market rate' (not the award rate, but a rate of pay which their competitors were paying). In some cases this has resulted in employees being underpaid.

The level of underpayments contraventions identified in this campaign does not accurately reflect the level of workplace relations knowledge amongst employers. Many employers paid a higher minimum hourly rate, as they did not completely understand the award phasing provisions and/or loadings and penalties. In most cases the higher flat rate of pay has offset any money owing to employees who have worked hours which attract a penalty or loading.

The campaign has been successful in achieving its stated objectives.

We received significant assistance from stakeholders in promoting the campaign. Their assistance, particularly from BSCAA, ACCA, United Voice and InClean has contributed to the success of promoting the message of compliance during the course of the campaign.

The campaign implemented a variety of communication strategies and developed several products that have been well received and assisted in providing the target audience information and raising awareness. It has been pleasing to receive comments from a number of employers that they found the audit phase to also be a valuable educational activity.

Given the findings of the campaign and in accord with FWO's commitment to monitoring compliance and contributing to long term behavioural change, there is likely to be a follow-up campaign in the cleaning industry within two years.

Appendix A

In addition to the key stakeholders referred to in the body of the report, the following general stakeholders were also contacted during the course of the campaign:

Business SA
Australian Chamber of Commerce & Industry
Department of Consumer and Employment Protection
Northern Territory Chamber of Commerce
Victorian Workplace Rights Advocate
Sydney Business Chamber
Australian Industry Group
Commerce Queensland
Council of Small Business of Australia
Department of Innovation, Industry, Science and Research
Tasmanian Chamber of Commerce & Industry
Tasmanian Small Business Council
The Australian Cleaning Institute
SA Unions
ACTU
Victorian Trades Hall Council
Unions NSW
Unions ACT
Victorian Employers' Chamber of Commerce and Industry
Qld Chamber of Commerce and Industry
WA Chamber of Commerce and Industry