

22 August 2025

Justice Hatcher
President
Fair Work Commission

Via email: awards@fwc.gov.au

Dear Justice Hatcher,

Re: Review of part-time provisions in certain modern awards (AM2025/17)

Thank you for the opportunity to provide a submission addressing the background document and the provisional view on the scope of issues to be considered to the review of part-time provisions in certain modern awards.

Clubs Australia represents over 5,000 not-for-profit licensed clubs across the country which directly employ more than 140,000 people.

Clubs have a diverse workforce which includes hospitality workers such as bar attendants and chefs, as well as those working in areas ancillary to the hospitality operations, such as greenkeepers, leisure attendants, fitness instructors and childcare workers. All clubs are owned by their members and take various forms and sizes, including sporting, returned service and bowling clubs.

Clubs offer a safe and inclusive environment for employment, work experience, apprenticeships and traineeships. The industry also has its own modern award, the Registered and Licensed *Clubs Award 2020* (the **Clubs Award**).

Clubs Australia supports the submission made by the Australian Chamber of Commerce and Industry, and in addition submits that the Award should not be included within the review of part-time provisions in certain modern awards.

As part of the 2010 review of modern awards, the Fair Work Commission (the **Commission**) undertook a comprehensive examination of the part-time employment provisions contained in the Clubs Award. Clubs Australia Industrial participated in this process, providing substantive submissions and multiple witness statements. This process resulted in a decision being issued on 5 July 2017 to vary the part-time provisions.

The Commission confirmed in the decision that greater flexibility in the rostering of hours was necessary for the part-time employment provisions in the Clubs Award and that retaining these flexible arrangements would be in the interests of both employees and employers. The Commission also amended the part-time employment provisions to include a number of additional protections for employees.



Clubs Australia submits that the current part-time employment provisions have already been carefully reviewed and specifically designed to accommodate the unique operational needs of the clubs' industry. These provisions support a high level of part-time engagement across the industry, providing employees with greater job security, access to leave entitlements, improved financial stability and a guaranteed level of income.

Please contact Joanne Ede, Clubs Australia, at [REDACTED] should you require any further information.