

29 September 2019

Sandra Lambert AM
Chair
ACT Remuneration Tribunal

Dear Ms Lambert

ACT Remuneration Tribunal 2019 Spring Review – Submission in relation to the Radiation Council (the Council)

Thank you for permitting the Council to submit a late application for consideration by the Remuneration Tribunal.

The Radiation Council wishes the Remuneration Tribunal to consider an increase in the per diem rates for Council or a change in payment structure so that a flat per diem is paid regardless of meeting length.

Increase and change in nature of Council Work

The core business of the Radiation Council is granting of radiation licences and registration of radiation sources. This work is important to the health and safety of the ACT community, and particularly those who work with radiation.

This core business has significantly increased year on year as set out in the table below:

Year	New licences	Percentage increase on previous year	Total licences	New Radiation Sources	Percentage Increase to previous year	Total Sources
17/18	215	7%	1411	50	4%	708
16/17	204	9.9%		62	4%	
15/16	195	4.7%		82	9.3%	
14/15	194	2.2%	1142	58	2.8%	602

As a result of the increased workload, meeting times have increased overall - from an average of 1.7 hours in 2015/2016 to the current average in 2019 of 2.3 hours.

This has had the effect of increasing Radiation Council meeting remuneration on average from the 2/5th per diem payment to the 3/5ths per diem payment as set out in Clause 3.3 of Remuneration Council *Determination 5 of 2019 - Part-time Public Office Holders*.

However, in Council's view, the increase in meeting times and consequential small increase in payment, does not reflect in full the increased time spent by Council members in preparation for the meeting. Meeting preparation is now done primarily online. Radiation licences and registration applications will often have significant number of lengthy documents which council member must consider relating to Radiation Management Plans, Shielding plans, qualifications and specifications of equipment. This additional preparation work has meant that the full increase in Council work has not been reflected in the length of meetings – and is therefore not being remunerated.

Council members are also increasingly being asked to consider matters out-of-session. While the move to online document sharing increases the responsiveness of Council for the benefit of licence holders, this is also an unmeasured additional time for Council members. The amount of time for each out-of-session consideration is less than one hour but cumulatively is an amount of time that members are unable to easily or cost effectively keep records and submit claims for.

It is our view that the Radiation Council should move to the set daily amount for each meeting to reflect the overall significant increase in workload which occurs for members through preparation at home and time in meetings.

Remuneration of the Chair

Council also considers that the role of Chair of the Radiation Council is inadequately remunerated in the current structure.

Since some of the radiation licence applications, and many of the source registration applications, are delegated to the Chair pending further information, this adds a significant burden on the Chair in subsequently considering and approving the applications on behalf of the full Council. Consideration of the source registration applications is particularly time consuming, involving reading the Radiation Management Plan, shielding plan, compliance inspection report, shielding verification evidence or potentially a shielding assessment report, and the case for approval presented by the Secretariat including how any compliance issues have been addressed.

We appreciate that the Chair Per Diem is at a higher rate because of the additional work that is expected of a Chair. However, the out-of-session delegation work required by the Chair of the Radiation Council is in addition to, and goes well beyond, matters such as Agenda setting, Minute approval and other ad hoc governance roles, that are usual for the additional Chair per diem to cover.

As much of this work is ad hoc, there are numerous short incursions on the Chair's time between meetings. The current guidelines require ad hoc work to be per hour. The record keeping requirements for numerous short calls on the Chair's time are an additional burden which the Chair has not found it possible to keep up with and are an administrative burden for the ACT Government. It is proposed therefore that the Chair of the Radiation Council be remunerated with one additional payment equalling a single meeting per diem for each time period between meetings, which occur approximately every six weeks. Alternatively, the Council submits there should be a greater proportionate increase in the per diem for the Chair to reflect numerous small periods of work between meetings.

In summary, the Council seeks an increase in the remuneration of its members, through either an increase in the per diem rate, or a change to a set meeting rate equal to the full per diem. Council also

seeks an increase to the Chair's rate equal per meeting cycle to an additional single day per diem payment.

The increase is sought due to:

- Increase in total work output
- Increase in meeting length
- Increase in pre meeting preparation due to the move to online papers
- Increase in out of session considerations.

ACT Government employee contribution

Finally, Council wishes the Tribunal to note that there is a significant contribution to the Council's work made by those members who are also ACT Government employees. We note that these Council members do not receive remuneration for their Radiation Council roles. However, in our view it is likely that their time spent on Radiation Council work is likely to be on top of their existing roles, and therefore unfunded by ACT Government. We feel it is important to acknowledge this contribution.

Thank you for your consideration of the Council's submission. Please do not hesitate to contact Ms Penny Hill or myself if you would like any further information.

Yours sincerely

Fiona F Jolly

Fiona Jolly
Deputy Chair
ACT Radiation Council