

CFV 117 Department of Education, Employment and Workplace Relations

Full name: Susan Haddrick

I wish this submission to be treated as: Public

If you are making this submission on behalf of an organisation, please provide the name:

Department of Education, Employment and Workplace Relations

State or Territory:

Contact phone number: 13 33 97

Question 14–1:

Division 2 of Part 3-4 of the Fair Work Act 2009 provides certain rights to permit holders who exercise a statutory right of entry to investigate a suspected contravention. These include the right to inspect and make copies of records or documents that relate to the suspected contravention (section 483(1)(c) of the Fair Work Act 2009).

If a new entitlement relating to family violence were created under the Fair Work Act 2009, permit holders would be entitled to inspect records relating to a suspected contravention, including a contravention of an employee's right to such entitlements. This would potentially include access to information related to family violence (unless expressly excluded).

However, it should be noted that the use or disclosure of information or documents obtained under the right of entry provisions of the Fair Work Act 2009 is closely regulated, and the improper use or disclosure of such information attracts a civil penalty under section 504 of the Fair Work Act 2009.

Proposal 14–1:

DEEWR notes Fair Work Ombudsman has published a Best Practice Guide on Workplace Privacy.

Proposal 14–2:

The Commonwealth has already provided funding of \$440,000 to the Australian Domestic and Family Violence Clearinghouse to carry out a project on domestic violence and workplace rights and entitlements.

The principal aim of the project is to improve the knowledge and capacity of unions and employer organisations to support employees experiencing domestic violence including through collective bargaining.

The funding provides for project managers to engage with employers and unions to inform them directly about these issues and the impacts for both workers and the workplace to build their capacity to support workers affected by domestic violence through the provision of training and resources, as well as to examine ways to address this through collective bargaining.

Further, the Commonwealth has provided \$1 million in one off funding over 4 years (2010/11-2013/14) to the White Ribbon Foundation to engage with Australian businesses and industrial organisations to help them prevent and reduce violence against women. The project aims to create long-term sustainable change in attitudes to violence and to implementing prevention strategies through the workplace by increasing the knowledge and skills of participating staff and managers to address issues of violence against women. The project:

- is designed as an awareness, early intervention and prevention program specifically for workplace settings;
- works to increase the knowledge and skills of staff and managers to address issues of violence against women; and
- encompasses large, medium and small-scale workplaces.

Proposal 14–3:

Section 653 of the Fair Work Act 2009 requires Fair Work Australia to undertake reviews and research in relation to enterprise agreements, individual flexibility arrangements, and the operation of the provisions of the National Employment Standards relating to requests for flexible working arrangements and extensions of unpaid parental leave.

In conducting the review and research, Fair Work Australia must consider the effect that these matters have had on the employment (including wages and conditions of employment) of women, part-time employees, persons from a non-English speaking background; mature age persons and young persons. Whether family violence could be considered in the review and research of the effect these arrangements have on the employment of women is a matter for Fair Work Australia.

Question 14–2:

DEEWR notes the ALRC's suggestion that the DEEWR Workplace Agreements Database (WAD) may be a useful and appropriate collection mechanism at Page 463 of the Discussion Paper but that it is seeking the views of stakeholders.

In response, the Department can advise that it is possible, and it is willing, to collect data on the incidence of references to domestic violence in enterprise agreements. This data capture would cover not only agreements with domestic violence clauses but also those agreements that make some mention of the domestic violence issue as part of the agreement. Thus the scope of the WAD data on domestic violence will be broad.

It would be possible to commence collection of the data for the June quarter 2011 onwards. The WAD data, similar to other non-wages data, would be available on request. Requests can be lodged currently at the [ebtrends@deewr.gov.au](mailto:ebtrends@deewr.gov.au) mailbox.

Question 14–3:

DEEWR notes Fair Work Australia does not have specific data collection functions as such. It does

however have certain disclosure obligations that relate to information it gathers in the course of performing its functions.

If data collection responsibilities were to be imposed on Fair Work Australia, they should be imposed on the General Manager, rather than the Tribunal.

Proposal 14–4:

In conducting the two year review of modern awards, Fair Work Australia must consider whether modern awards achieve their objective and are operating effectively and without anomalies or technical problems.

The 4 yearly reviews of modern awards are the principal way in which a modern award is maintained as a fair and relevant safety net of terms and conditions.

Depending on the process for and the scope of the reviews, which have not yet been announced, it would be open to any stakeholder to raise such issues or suggestions with Fair Work Australia during the course of the reviews.

Question 15–1:

DEEWR considers the current Deed is very clear on tailoring services to job specific need. The Request for Tender for the Employment Services Deed 2009-12 required providers seeking to tender for JSA services to address a range of selection criteria. Tenderers bidding to deliver JSA services had to demonstrate an ability to deliver the full range of Stream Services tailored to individual job seeker needs.

Tenderers were required to describe how they would deliver innovative, individualised and tailored services to meet the diverse needs of job seekers within their Employment Services Area (ESA) including strategies to assist the full range of job seekers—from those who are work ready to those who are highly disadvantaged (for example Indigenous Australians, people from a CALD background, refugees, the homeless), and who face multiple non-vocational barriers (including family violence) to employment.

Tenderers were also required to describe their experience in establishing and building community linkages, including partnerships and or practical collaborations with relevant local community support organisations.

The Employment Services Deed 2009-12 states that providers must comply with the Code of Practice and conduct the Services at or above the minimum standards in the Service Guarantees.

The Code of Practice commits providers to helping each job seeker find their pathway into employment by:

- meeting the Service Guarantees which includes assisting those job seekers experiencing disadvantage address non-vocational barriers (including family violence),
- tailoring assistance to the job seekers' personal circumstances, skills, abilities and aspirations,
- using available Government funding appropriately to support job seekers,
- treating every job seeker fairly and with respect, and

- providing a fair accessible feedback process.

The Service Guarantees also require the Job Services Australia provider to take account recognised limits on the job seekers' ability to find work.

Question 15–2:

Certain information is shared on the Employment Services System (ESS) – a program providing a secure electronic environment that allows providers to manage their job seekers and caseloads.

Due to privacy legislation not all information is shared across Centrelink and ESS.

IEP Providers do not have access to the Centrelink and Employment Services System (ESS).

Question 15–3:

Currently records that are coded as deny access on the employment services system have the personal details blanked out.

Proposal 15–1:

The Employment Services Deed 2009-12 sets out the following requirements of providers in relation to Privacy and information sharing. Specifically in Section 5C – Control of information at clause 93 regarding personal and protected information, including privacy obligations and notifications to DEEWR in the event of breaches of such obligations. Also at clause 94 regarding the limited and strict conditions for disclosure of confidential information.

Sections 3C and 3D of the DES DEED 2010-2012 cover personal and protected information and Records Management. These Deed requirements would cover any recommendations in this area.

IEP Providers do not have access to the Centrelink and Employment Services System (ESS). Only relevant DEEWR IEP staff have access to job seeker records for the purposes of referring job seekers to an IEP activity or creating a job seeker record.

Proposal 15–2:

A job seeker may change JSA provider if the job seeker:

- changes residential address and can no longer access their JSA provider's Site—relocation.
- or JSA provider, requests a Transfer by DEEWR, if at any time the job seeker and JSA provider are unable to maintain a reasonable and constructive servicing relationship—relationship failure
- requests to change JSA provider and both JSA providers agree to the change—by agreement, or
- requests DEEWR to change JSA provider where they can demonstrate they would receive better services from another JSA provider that could enhance their employment prospects—better services for the job seeker with another JSA provider.

These current arrangements do not preclude a job seeker who is experiencing family violence from changing providers. A job seeker who is experiencing family violence and is registered at the same provider as the person using family violence could demonstrate that they would receive better

services from another JSA provider that could enhance their employment prospects. The job seeker experiencing family violence and the current and potential JSA provider could also reach a mutual agreement to enable the job seeker to change providers.

Question 15–4:

DES and JSA providers, and Centrelink can conduct a Change of Circumstances Reassessment for an individual at any time during the servicing if the individual discloses information about their circumstance that may affect the level of services they receive.

Disclosure by the individual of family violence may require a referral to a Centrelink Social Worker for immediate assistance and further assessment of the individual's needs.

Question 15–5:

As noted by the ALRC, JSA providers are provided with information about what they should do if a job seeker discloses domestic violence, family grief or trauma. Specifically, 'A JSA provider should immediately refer a job seeker who discloses domestic violence, family grief or trauma to a Centrelink Social Worker'.

The department has not received any direct feedback that the current arrangements are not working effectively for those disclosing family violence.

Proposal 15–3:

Job Services Australia places a greater focus on the needs of the most disadvantaged Australian job seekers to achieve greater social inclusion.

A key feature of Job Services Australia is the provision of services in accordance with a job seeker's assessed level of disadvantage. The services are provided in four Streams, with Stream 1 for the more job ready job seekers up to Stream 4 for the most highly disadvantaged job seekers with multiple vocational and non-vocational barriers (including family violence). Each Stream also offers access to Work Experience Activities.

Work Experience for job seekers under Job Services Australia currently seeks to provide job seekers with the most flexible range of options reasonably possible. Work Experience comprises a number of vocational and non-vocational options onto which JSA providers can place job seekers, where they identify job seeker need. Several of these available options would assist with specific instances of family violence for both support for victims of family violence, and intervention for perpetrators, including:

- Anger and anxiety Management, and conflict resolution
- Assertiveness Courses
- Relationship Counselling
- General Counselling Services
- Trauma Counselling

- Mediation.

There is also scope for addressing possible contributory factors through activities such as:

- Drug or alcohol rehabilitation
- Other Addictions Counselling
- Gambling intervention.

The Employment Pathway Fund (EPF) is a flexible pool of funds available to Job Services Australia providers to purchase a broad range of assistance to support eligible job seekers to overcome their vocational and non-vocational barriers to employment. Support for job seekers may include training, work experience, clothing, transport costs, as well as assisting them to overcome any personal difficulties which may be hindering their ability to find and keep a job such as mental health support, family mediation and anger management.

DEEWR does not prescribe how JSA providers manage their job seekers, however we do encourage providers to have links with relevant community service providers. In the case of domestic violence we would provide guidance to JSA providers to facilitate access to the relevant services including the Police, Centrelink social workers and other support services as appropriate to the needs of the individual job seeker.

Proposal 15–4:

Employment Services provider Guidelines either already address, or are being updated, to cover this proposal.

Published Job Services Australia provider Guidelines require:

- that JSCIs be conducted in a private setting
- that JSCIs be conducted face-to-face, unless there are exceptional circumstances
- interpreter services be used where appropriate
- the JSA provider to encourage the job seeker to provide open and honest responses to all the questions to ensure that the job seeker received the most appropriate services, and
- permit a job seeker to be accompanied by their nominee, including a family member, advocate, social worker or counsellor for support.

Disability Employment Services provider Guidelines are being updated to include the same requirements and will be published in the near future.

Question 15–6:

Consideration of safety and other concerns arising from an individual's experience of family violence can best be assessed by the Centrelink social worker, who can then determine the appropriate course of action or actions that may be appropriate to meet the individual's immediate and longer term needs.

Proposal 15–5:

Given the relatively small numbers of job seekers reporting domestic violence, this factor does not appear to warrant a separate category, but will be maintained as a sub-category under 'Personal Factors'.

Question 15–7:

A process is already in place that requires referral to a Centrelink Social Worker where family violence is disclosed by an individual.

The Social Worker will assess the impact of the disclosed family violence to determine the individual's immediate support requirements and any participation activity exemption that may be appropriate.

The Social Worker may also consider that the severity of the disclosed family violence is a significant longer-term barrier to work that requires referral for an ESA.

Introducing a system-based auto-referral to ESA could lead to a significant increase in the number of ESAs conducted and result in resourcing issues.

Question 15–8:

DEEWR considers DHS assessors have the relevant skills to take appropriate action if family violence issues are disclosed during an interview.

Introducing specific assessor qualifications or expertise with respect to family violence ESA could lead to assessor resourcing issues.

Question 15–9:

While conducting an ESA, the DHS assessor is required to identify barriers to employment including medical and other social barriers

During the interview if the individual discloses family violence issues the assessor will refer the individual to appropriate community or employment services to address these barriers.

The ESA report will identify barriers, including family violence, along with specific interventions suggested by the assessor to address the issue.

The assessor may recommend a Supporting Intervention (e.g. counselling) and liaise with numerous key stakeholders such as treating health professionals including doctors, psychologists, psychiatrists, community nurses and Centrelink Social Work Services as may be appropriate to the individual's needs.

Question 15–10:

All instances of family violence disclosed during an ESA are considered serious. In addition to the response provided to Question 15.9, if issues are current, the DHS assessor may need to immediately refer the individual to the police and/or crisis intervention services. Where minors are at

risk, assessors have mandatory reporting requirements.

Proposal 15–6:

The Request for Tender for the Employment Services Deed 2009-12 required providers seeking to tender for JSA services to address a range of selection criteria. Tenderers were required to describe the recruiting and training strategies their organisation would implement and how they would retain suitably qualified and experienced staff in order to deliver the full range of Stream Services tailored to individual job seeker needs.

The Department does not prescribe the training that JSA providers are required to provide their staff.

Organisations contracted to deliver Australian Government funded employment services have agreed and are committed to observe the Employment Services Code of Practice. This Code of Practice sets out the principles and standards that underpin the delivery of employment services and other services to increase employment outcomes and participation in economic activities in Australia especially for disadvantaged client groups.

Specifically, providers:

- commit to working with clients, employees, sub-contractors, and other providers to deliver quality employment services by ensuring staff have the skills and experience they need to provide quality and culturally sensitive services to job seekers employers and local communities and working in collaborative partnerships with stakeholders and communities to identify needs and how they can be met
- Behaving ethically and acting with honesty, due care and diligence
- Being open and accountable
- Avoiding any practice or activity which a provider could reasonably foresee could bring employment services into disrepute
- Sensitively managing any information collected

Question 15–11:

In the Request for Tender (RFT) for the Indigenous Employment Program, tenderer's must demonstrate their understanding of issues confronting Indigenous Australians as they relate to:

- commencement and retention in training and employment;
- sustainable business development; and engagement in economic development activities.

This information should include details about their knowledge of the barriers that prevent Indigenous Australians from participating in employment, education, training, the economy, and developing business initiatives.

The RFT also requires they describe their strategies and experience they will use to collaborate with other organisations to address the barriers to employment, training education access to economic support.



Where IEP directly contracts with employers, the package of assistance may include delivery of cross cultural awareness training, a strategy that supports the employer to increase their knowledge and awareness of the barriers to employment for Indigenous Australians.

Additionally, some employers may recruit an Indigenous Employment Coordinator, whose role could be to educate and advise the organisation on issues/barriers relating to employment for Indigenous Australians.

Question 15–12:

The Australian Government is committed to halving the employment gap between Indigenous and non-Indigenous Australians within a decade.

To help more Indigenous Australians into work, Job Services Australia will help ensure employment and training services meet the needs of Indigenous job seekers, Indigenous businesses and employers.

Job Services Australia provides tailored assistance to job seekers, particularly disadvantaged Australians (including Indigenous Australians, people from culturally and linguistically diverse backgrounds and people with disabilities), to help individuals to obtain the skills they need and to secure sustainable employment.

Organisations contracted to deliver Australian Government funded employment services have agreed and are committed to observe the Employment Services Code of Practice. This Code of Practice sets out the principles and standards that underpin the delivery of employment services and other services to increase employment outcomes and participation in economic activities in Australia especially for disadvantaged client groups.

Specifically, providers:

- commit to working with clients, employees, sub-contractors, and other providers to deliver quality employment services by ensuring staff have the skills and experience they need to provide quality and culturally sensitive services to job seekers employers and local communities and working in collaborative partnerships with stakeholders and communities to identify needs and how they can be met.
- commit to helping each job seeker find their pathway into employment by meeting the Service Guarantees and tailoring assistance to the job seekers' personal circumstances, skills, abilities and aspirations.

In many locations across Australia, Job Services Australia providers can offer specialised services to job seekers who have been assessed as being highly disadvantaged. Highly disadvantaged job seekers can include Indigenous Australians, people from linguistically and culturally diverse backgrounds and people with disabilities.

Tenderers were required to describe how they would deliver innovative, individualised and tailored services to meet the diverse needs of job seekers within their ESA including strategies to assist the full range of job seekers—from those who are work ready to those who are highly disadvantaged (for example Indigenous Australians, people from linguistically and culturally diverse backgrounds and people with disabilities), and who face multiple non-vocational barriers (including family violence) to employment.

DEEWR does not prescribe how JSA providers manage their job seekers, however we do encourage providers to have links with relevant community service providers. In the case of domestic violence we would provide guidance to JSA providers to facilitate access to the relevant services including the Police, Centrelink social workers and other support services as appropriate to the needs of the individual job seeker.

The objective of the Indigenous Employment Program is to increase Indigenous Australians' employment outcomes and participation in economic activities, contributing to the Government's commitment to halving the gap between Indigenous and non-Indigenous employment outcomes within a decade.

IEP supports a range of activities that will develop the capacity of employers, Indigenous Australians and their communities to increase opportunities through employment, business and other economic development activities.

The IEP through its IEP Panel/s or directly with employers provides a tailored package of assistance to encourage and support Indigenous Australians to take up training and employment opportunities, stay in jobs and enhance their future employment prospects.

Question 15–13:

See response to Question 15-12

Question 15–14:

See response to question 15-12

Question 15–15:

Proposal 16–1:

An employee experiencing family violence and who has responsibility for the care of a child under school age, may currently request a change in working arrangements in accordance with section 65. This may include flexible hours to assist an employee manage child care arrangements after leaving an abusive partner.

Further, the Fair Work Act 2009 already provides a range of additional measures that may assist employees who are experiencing domestic or family violence. These measures include statutory

minimum entitlements under the National Employment Standards to personal and carers' leave for full-time and part-time employees, an entitlement to two days per occasion of compassionate leave to support a family member with a serious personal illness or personal injury, and a range of general protections. For example, it is unlawful for an employer to dismiss an employee for temporary absence from work, due to illness or injury where the employee has given the employer a medical certificate or is on personal/carer's leave.

In respect of the eligibility requirements, requiring an employee to complete at least 12 months of continuous service with their employer prior to being eligible to request flexible working arrangements, ensures there is a reasonable time to establish the employee/employer relationship. Further, this requirement provides a reasonable qualifying period to balance the needs of the employer and employee.

Employers and employees are also free to directly negotiate working arrangements that best suit their individual needs.

If the 12 months' continuous service requirement was removed for employees experiencing family violence, this would result in a disparity between entitlements available to other groups of employees eligible to request flexible working arrangements (i.e. parents of children under school age).

The existing requirement that an employer must respond to a request for flexible working arrangements within 21 days acknowledges the time required for employers to sufficiently consider and respond to such a request.

Proposal 16–2 :

As outlined in the response to proposal 16-1, the Fair Work Act 2009 already provides a range of measures that may assist employees who are experiencing domestic or family violence. These measures include statutory minimum entitlements to personal and carers' leave for full-time and part-time employees, an entitlement to two days per occasion of compassionate leave to support a family member with a serious personal illness or personal injury, access to flexible working arrangements and a range of general protections.

The Fair Work Act 2009 also requires that all modern awards and enterprise agreements must include a model flexibility clause. This allows employers and individual employees to make individual flexibility arrangements that suit specific needs.

It should also be noted that the National Employment Standards (NES) are minimum entitlements and should be seen as the benchmark in which employers can improve upon. The NES does not prevent employers from providing more generous provisions including domestic violence provisions in industrial instruments.

Proposal 16–3:

Refer to answer to Proposal 16.2 for further information.

Proposal 16–4:

Refer to answer to Proposal 16.2 for further information.

Proposal 17–1:

DEEWR notes the Fair Work Ombudsman has developed a best practice guide on the use of individual flexibility arrangements (IFAs). The guide explains how employees and employers can use IFAs to create flexible work practices that enhance productivity and job satisfaction.

The amendment of the current IFA guide or the development of a new best practice guide to respond to the need of employees experiencing family violence is a matter for the Fair Work Ombudsman.

Proposal 17–2:

DEEWR has provided funding to the Australian Domestic and Family Violence Clearinghouse (ADFVC) to carry out a project on domestic violence and workplace rights and entitlements. The principal aim of the project is to improve the knowledge and capacity of unions and employer organisations to support employees experiencing domestic violence including through collective bargaining.

Proposal 17–3:

DEEWR notes that the development of any new Best Practice Guides is a matter for the Fair Work Ombudsman.

Further, as part of the ADFVC's Workplace Rights and Entitlements project, materials such as facts sheet have been developed for employers, unions and employees on the inclusion of family violence clauses in enterprise agreements.

Proposal 17–4:

It would be open to any stakeholder to raise such issues or suggestions with Fair Work Australia during the course of the review.

Proposal 17–5:

Depending on the process for and the scope of the review it may be open to any stakeholder to raise such issues or suggestions with Fair Work Australia during the course of the review.

Proposal 17–6:

DEEWR notes this is a matter for the Fair Work Australia President.

Question 17–1:

Regulation 3.01 of the Fair Work Regulations 2009 (Cth) is broadly drafted to define a prescribed kind of illness or injury as one that exists if the employee provides a medical certificate or statutory declaration about the illness or injury within a certain timeframe. The definition does not confine the 'illness or injury' to physical illness or injury.

It is possible that the current provision is broad enough to cover a temporary absence due to illness or injury related to family violence. However, to put the matter beyond doubt, the section could be amended to include specific reference to absence due to family violence.

Proposal 18–1 :

Please refer to comments in the 'other comments'

Proposal 18–2 :

Proposal 18–3:

Proposal 18–4:

Question 18–1:

Other comments:

Question 16–1 How do, or how could, Fair Work Australia's role, functions or processes protect the safety of applicants experiencing family violence?

DEEWR notes the consideration of the role and functions of Fair Work Australia is a matter for that organisation, noting that Fair Work Australia is obliged to respect confidentiality.

Question 16–2 In making an application to Fair Work Australia, applicants are required to pay an application fee. Under the Fair Work Regulations 2009 (Cth) an exception applies if an applicant can establish that he or she would suffer 'serious hardship' if required to pay the relevant fee. In practice, do people experiencing family violence face difficulty in establishing that they would suffer 'serious hardship'? If so, how could this be addressed?

Fees are only payable in respect of unfair dismissal applications. DEEWR notes the administration of this process is a matter for Fair Work Australia.

Question 16–3 In applying for waiver of an application fee, referred to in Question 16–2, applicants must complete a 'Waiver of Application Fee' form. How could the form be amended to ensure issues of family violence affecting the ability to pay are brought to the attention of Fair Work Australia?

As mentioned above, fees are only payable in respect of unfair dismissal applications. DEEWR notes amendments to this form are a matter for the President of Fair Work Australia.

However, question 14 of the 'Waiver of Application Fee' form already provides scope for applicants to provide any other information which they believe Fair Work Australia should consider when deciding whether to waive the fee.

Question 16–4 In Proposals 14–1, 17–1 and 17–3 the role of the Fair Work Ombudsman is discussed. In what other ways, if any, could the Fair Work Ombudsman's role, function or processes protect employees experiencing family violence?

DEEWR is of the view that the Fair Work Ombudsman's role should not be expanded beyond its current role.

Safe Work Australia:

Safe Work Australia will be responding to the specific proposals recommended in the discussion paper, however, this department which has also played a lead role in the harmonisation of OHS laws and regulations consider that the following contextual information is important when considering the

proposals being canvassed in the Discussion Paper.

The consultation, legislative drafting process and decision process for the model Act, model regulations and model codes of practice has been overseen and agreed to by the Workplace Relations Ministers' Council (WRMC) as part of the Council of Australian Government's (COAG) agreement under the Intergovernmental Agreement for Regulatory and Operational Reform in OHS (IGA).

Safe Work Australia is the Government statutory agency with responsibility for improving work health and safety and workers compensation arrangements across Australia. Membership of Safe Work Australia consists of representatives from Commonwealth, State and Territory governments, employer and employee organisations.

In developing the regulations and codes of practice Safe Work Australia established a Strategic Issues Group on OHS (SIG-OHS) to develop the model work health and safety Regulations and Codes of Practice as outlined in the IGA, and that have been determined as a priority for OHS. These Regulations and Codes of Practice have been subject to extensive public consultation prior to consideration by WRMC.

The processes in place for the development of Regulations and Codes of Practice impact on the proposals suggested in the ALRC Discussion Paper, and are currently outside the process and scope of issues identified through the consultation processes undertaken to date. Any additional codes or content for codes would need to be agreed through Safe Work Australia's members.

It is also relevant to note that at this time five out of the nine jurisdictions have put the model Act before their parliaments, with the Commonwealth Work Health and Safety Bill introduced to Parliament on 6 July 2011.

Upload supporting documents:

File 2:

The results of this submission may be viewed at:

<http://www.alrc.gov.au/node/4001/submission/3608>