

## Terms of Settlement

1. The Community and Public Sector Union (CPSU) agrees to pause bans 20 and 21 unconditionally for a period of not less than 7 days from 11AM on Sunday 20 November 2011.
2. Dean Yates and Karen Batt agree to meet at 3pm on Sunday 20 November 2011 at a conference to be facilitated by Commissioner Smith.
3. The State will make available a senior official of DHS or other appropriate Department on Sunday 20 November 2011 to meet with CPSU child protection worker delegates (of whom there will be three)
4. The parties commit to a timetable of meetings over the next three days for the parties in 2. and 3. above to allow sufficient time to hold discussions.
5. Bans 9, 10, and 15, will not be imposed by child protection workers rostered to work weekends in the circumstances outlined in transcript by counsel for CPSU on 18 November 2011.
6. The above arrangements are proposed in line with the spirit and intent of Commissioner Smith's recommendation of 17 November 2011 and with the view of reaching agreement.
7. The parties agree that they will not communicate or announce to any person any detail of this agreement until it is entered into the record of transcript at Fair Work Australia at the hearing listed before Commissioner Smith at 11AM on Sunday 20 November 2011.
8. The State will withdraw its application to suspend or terminate protected industrial action filed on Thursday 17 November 2011.