



SDA SUBMISSION TO THE PRODUCTIVITY COMMISSION CARER'S LEAVE INQUIRY

SDA members are workers and carers

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National Secretary-Treasurer



About the SDA



The Shop, Distributive and Allied Employees' Association (the SDA) is one of Australia's largest trade unions with over 210,000 members. Our members work in retail, warehousing, fast food, hairdressing, beauty, pharmacy, online retailing, and modelling.

The majority of SDA members are women (60%, approximately 131,000), under 35 years (57%, approximately 120,000 workers), and low-income. Retail and food services are two of the three lowest industries for median weekly earnings.

The SDA has a long history of advocating on behalf of members with caring responsibilities, who are predominately our women members. We do this through enterprise bargaining; making submissions regarding Awards and the NES to provide a relevant safety net; and through numerous submissions made to parliamentary and government inquiries and other important reviews.

The SDA has 10 policy principles that guide our engagement in these reviews. For a list of these, see Appendix B.



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Executive Summary

The SDA welcomes the opportunity to make a submission to the Productivity Commission Inquiry to examine the potential impact of amending the NES to extend unpaid carer's leave providing informal care to older people who are frail and living at home and alternative ways to support those carers.

Recent research the SDA commissioned by the University of NSW Social Policy Research Centre found that SDA members provide informal care to many people in their families and communities, this includes older people, including older parents, relatives and members of their community. This care is often provided whilst caring for others, such as children, people with disability or illness, siblings and other family and friends. Our members provide care at higher rates than the general population. They do this while trying to manage work that is low paid and typically unpredictable and insecure. They are not well supported by their workplace to provide the care they need to and are often penalised at work for this.

SDA members make a valuable contribution to our economy and society, not only through their paid work, but also through the unpaid labour they provide as carers. This valuable contribution is not valued by our society and economy and is poorly accommodated in their workplaces.

Providing care is gendered. Our research demonstrates that women carry a much higher burden of care for all people who need it and at all stages of their work life cycle. As a result, women incur the greatest penalty in relation to participation in paid work which impacts on income and earnings, employment status, carer progression and retirement savings.

While some members may benefit from the ability to access an extended period of unpaid leave to provide care to an older person or someone with a disability or illness, our members need a range of improved paid leave entitlements and workplace protections to support them to provide the vital unpaid care to older Australians and others, that is so critical to our society, while being able to participate in paid work. This is also critical to addressing the gendered impacts of providing care.

Recommendations

Better support for carers who need leave from work to care

1. Extend unpaid carers leave with the right to return to work under the NES for workers who need extended leave to care for an older person or someone with a disability or temporary or terminal illness.
2. Review the adequacy of government payments for carers, including the amount paid and payment of the superannuation guarantee.
3. Increase paid leave entitlement for carers under the NES.
4. Amend the rate Personal Leave is paid under the NES to payment at the employee's full rate of pay, worked out as if the employee had not taken the period of leave.
5. Introduce paid carer's leave for casuals.
6. Extend provisions for workers to access personal leave entitlements when caring for others outside of their immediate family or household, in line with the carer definition under the *Carer Recognition Act 2010 (Cth)*.
7. Amend the *Fair Work Act 2009* to enable an employee to provide evidence for absences that is recognised for an ongoing period rather than requiring evidence to be obtained separately for each absence, for example, letter from a medical practitioner.

Better support for workers who provide regular care while they work

8. Amend the *Fair Work Act 2009* to include a right for permanent employees with caring responsibilities to reduce their existing hours for a period of up to two years, and the right to revert to the existing hours at the end of that period.
9. Strengthen the 'right to request' provisions under s65 of the *Fair Work Act 2009 (Cth)* (FWA) by:
 - Removing the qualification requirements in section 65(2)(a) of the FWA (i.e., the requirement for 12 months' service).
 - Amending the grounds for employers to refuse flexible working arrangements from 'reasonable business grounds' to 'unjustifiable hardship'.
 - Introducing a positive duty on employers to reasonably accommodate flexible working arrangements (as in the Victorian Equal Opportunity Act).
 - Establish an appeal process through the Fair Work Commission for decisions related to s65 of the Fair Work Act, the right to request flexible working arrangements, which is currently prohibited under S739 of the Act. This appeals process should not only address procedure but should include the ability for employees to appeal an employer's decision to refuse the request.

10. Amend the *Fair Work Act 2009* to provide improved rights for employees, and in particular carers, to:
 - Predictable and stable rosters with fixed times and days.
 - Genuine consultation regarding rosters, and other changes to work arrangements.
11. Amend S145A of the *Fair Work Act 2009* to require employers to genuinely consider employee views about the impact of proposed roster changes and to accommodate the needs of the employee.

Better protections against discrimination against workers with caring responsibilities

12. Amend the *Sex Discrimination Act 1984 (Cth)* to include a positive duty on employers to eliminate discrimination as far as possible. (as in the *Equal Opportunity Act 2010 (Vic)*)

SDA members are workers and carers

1. Last year, the SDA commissioned the University of Sydney Social Policy Research Centre to survey our members in relation to their experience in managing their work and care. The *Challenges of work, family and care for Australia’s retail, online retail, warehousing and fast food workers*¹ report (SDA Who Cares? Report) was published in October. The report was based on the survey responses of 6469 SDA members.
2. The report found that SDA members make valuable contributions through the unpaid labour they provide as parents, and carers to children and adults in their families and communities, which also benefits the economy. Overall, 55% of survey respondents provide regular care to a child or an adult, however this was higher for women (60%) than men (43%). The most common form of care was providing care to a child under 18 years (39%) and 30% of all participants were parents of a child under 18. Older SDA members also provide care to grandchildren (17%) and young SDA members are providing regular care to siblings and adults with disability or long-term illness.
3. SDA members regularly provide unpaid care or assistance to an adult, such as an older person, person with disability or health condition²:
 - 17% said they provided care to an older person,
 - 10% provided care to someone with a long-term illness or health condition, and
 - 9% provided care to a person with a disability.

Provision of eldercare is highest among SDA members aged in their early 50s, when around 27% of SDA members are involved in providing care³.

4. SDA members care for older people and others at disproportionately high rates when compared to the national population:

	Australia (ABS)	SDA survey participants
Care for an older person or person with disability	11%	24%
Sole parents	14% of families	25% of parents
Parent of a child with a disability	7.7% (children <15 with a disability)	16% (children <18 with a disability)
Young carer’s (<25, provide regular care to elderly, person with disability)	5.6%	13%

¹ Cortis, N., Blaxland, M., and Charlesworth, S. (2021). *Challenges of work, family and care for Australia’s retail, online retail warehousing and fast food workers*. Sydney: UNSW Social Policy Research Centre.

² Ibid, page 22

³ Ibid, page 23

5. Given the amount of unpaid caring they do, and that our members are low paid workers who typically live in low-income households, they have little disposable income to save for periods of unpaid leave to provide care. This would diminish the benefit that an extended unpaid leave entitlement would have for our members, who provide high levels of care to older people and adults with a disability or illness.
6. SDA members provide care to a range of adults⁴:
 - 18% care for an elderly, ill or disabled parent or parent in-law
 - 4% care for a partner or spouse
 - 4% care for a grandparent
 - 3% care for a sibling
 - 2% care for an adult child
7. Many SDA members provide care to a child or children while also caring for an older person. Sixteen percent of parents with a child aged 18 and under, and 12% of parents with a child aged 5 or under, were also providing regular elder care⁵.
8. Young SDA members also provide care for older people and adults with a disability or long-term health condition. Thirteen percent of young SDA members up to age 25 provided regular unpaid care to an older person, person with disability or person with a long term health condition:
 - 11% of those aged 20 or under, and
 - 15% of those aged 21 to 25⁶.

These figures were similar to the proportions of SDA members in older age groups providing care.
9. The proportion of young SDA members with care responsibilities is relatively high. The 2016 Census found that among people aged 15 to 24, 5.6% were young carers, providing care to an older person or adult with a disability or long-term health condition⁷.
10. The following graph shows the proportion of surveyed members who regularly provide care by age and the type of care they provide. This demonstrates the enormous amount of unpaid labour SDA members contribute to the care of others over their working lives.

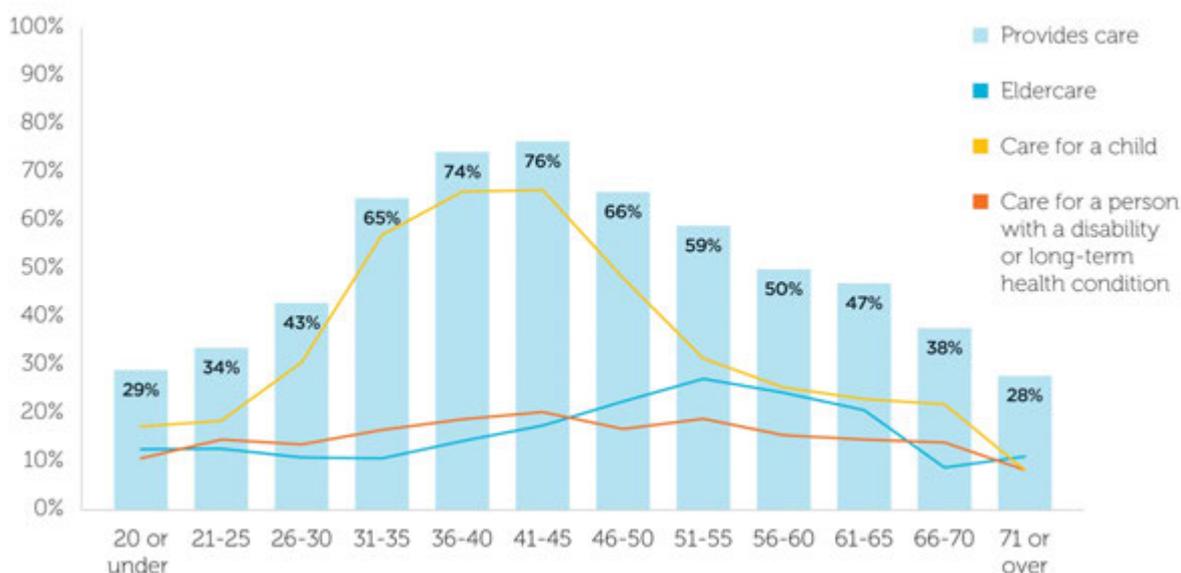
⁴ Ibid, page 22

⁵ Ibid, page 22

⁶ Ibid, page 23

⁷ Ibid, page 23

Figure 4.2 Proportion of participants who regularly provide care by age and type of care provided



11. This contributes an enormous amount to our society and economy but at great cost to their ability to participate in paid work, their income and retirement savings. Greater support, including economic support, needs to be available to workers who provide unpaid care, to eliminate or at least minimise this economic cost to them.
12. Respondents to the survey were typically from low-income households, '52% of respondents live in households with post-tax income of less than \$1000 per week. This was the case for 32% of couple parents and 80% of sole parents, and 56% of workers who were not currently parenting a child aged under 18 (see Appendix Table A.10)⁸.
13. The full report can be found at [Challenges of work, family and care for Australia's retail, online retail, warehousing and fast food workers | SDA Union](#) and the Executive Summary is attached to this submission.

Lack of workplace support and legislative protection for workers who provide care

14. The SDA Who Cares? Report found that the needs of workers, and in particular carers is being unmet by employers and current employment regulations. Work time arrangements are characterised by short, fluctuating hours and precarious shifts and rosters, for both casual and permanent workers. Workers are penalised for their caring responsibilities and fear repercussions in the form of lost hours and opportunities. This is impacting the labour supply of workers, creating a barrier to work which is impacting on the health, wellbeing and financial security of workers and their families. This is also at odds with the fact that most of the employers of members surveyed have policies in place in relation to flexible work, supporting workers with family and caring responsibilities.
15. The report also found that '*For employers, policy makers and regulators, the findings serve as a reminder that as well as contributing to the economy and society through their paid work, employees make essential and valuable contributions of unpaid care work, which families and communities depend on, and which paid work must be organised to support. While large companies in Australia are required to have and report on their gender equality policies, such as*

⁸ Ibid, page 82

*flexible working arrangements and supports for workers with family responsibilities, our findings show these policies are not delivering benefits to low-paid workers and their families*⁹

16. Legislative protections for carers, which company policies in retail and fast food typically mirror, are flawed. The two main provisions are Personal Leave (paid and unpaid) and the right to request flexible working arrangements.
17. Carer's Leave is only available to permanent employees and forms part of the allocation of personal leave that a worker is entitled to, which is also for the purpose of taking time off in relation to the workers own health. Evidence requirements are also quite prescriptive, requiring fresh evidence per occasion, which is a burden on those who provide regular care, particularly to someone with a known, ongoing condition. The entitlement to leave is also restricted to only cover instances of caring for immediate family members or members of the household, which leaves a gap for those who provide care to others in the community, whether it be extended family or friends and neighbours.
18. The other main legislative support for carers in the NES is the right for carers to request flexible working arrangements (Section 65). This is a fundamentally flawed provision. Workers have always had a right to ask their employer for a change to their working arrangements. What this provision does is to write this ability to ask a question into law. It does not provide any substantive right for a worker who provides care to have the flexible working arrangements they need to provide care. It is also one of only two provisions in the *Fair Work Act 2010 (Cth)* that an employee has no ability to appeal to the Fair Work Commission if an employer refuses them the entitlement. Notably, the other provision in the Act that is not appealable is Section 76, extending unpaid parental leave to up to 104 weeks. Both are provisions which predominately apply to women.
19. Company policies on flexible working arrangements and supporting family and caring responsibilities in retail and fast food typically mirror the minimum legislative entitlements.
20. Unfortunately, our members are not well supported at work when they need to provide care. Insecure and unpredictable rostering practices, the failure to recognise and accommodate their caring responsibilities and punishment for needing time off or rosters that support this are all too common.
21. This all serves to create significant barriers that limit carers from accessing the entitlements they need to both work and care. This also leads to significant health and financial impacts on working carers and impacts on the care they can provide and participation in paid work.
22. Retailers and fast food companies are currently claiming that labour shortages and lack of staff are impacting severely on business, yet the lack of workplace support provided to existing workers with caring responsibilities, including unpredictable rostering and denial of flexible work requests leaves workers who want more hours underemployed and under-utilised by their employer.

⁹ Ibid, page 93

Health Impacts

23. The SDA Who Cares? Report found that the working time arrangements of SDA members who provide care impacts workers mental health and creates stress for their families; *Among all participants, 35% either agreed or strongly agreed that the way they are rostered impacts on their mental health*¹⁰.

*My hours affect me and my family. I have an 11 year old to care for and my husband has terminal cancer. I need to be at home of a night time, but work don't seem to care about that.*¹¹

Partnered mother of child with disability, permanent part-time

*I have repeatedly advised my manager that I am a carer and being given no notice on roster changes is very stressful.*¹²

Woman, carer of person with long term illness, permanent part-time

*If [my hours] were consistent week to week I could plan doctor's appointments for my elderly mother. As they change often it's very hard to plan for outside your work life.*¹³

Woman, elder carer, permanent part-time

Financial Impacts

24. Our members, particularly those managing care with work are not only impacted in relation to their mental health, but it also impacts on their financial wellbeing because it impacts on their ability to participate in paid work, leading to lower incomes and retirement outcomes.
25. As previously stated, '52% of respondents live in households with post-tax income of less than \$1000 per week. This was the case for 32% of couple parents and 80% of sole parents, and 56% of workers who were not currently parenting a child aged under 18 (see Appendix Table A.10)'¹⁴.
26. Underemployment is a common theme that came out of the report, and this is heavily impacted by the need to balance unpredictable, insecure rosters with the need to care. Participants were asked how strongly they agreed or disagreed with the statement. Only 36% of participants agreed or strongly agreed that "I work enough hours to make a living". This was lower for sole parents (25%) (Appendix **Error! Reference source not found.**). Women were also less likely to agree, and more likely to disagree, compared with men (Appendix **Error! Reference source not found.**), and that that underemployment is affecting workers across the lifecourse and impacts casual and permanent workers¹⁵.

¹⁰ Ibid, page 76

¹¹ Ibid, page 70

¹² Ibid page 70

¹³ Ibid, page 72

¹⁴ Ibid, page 82

¹⁵ Ibid, page 82

Shifts regularly get added or changed without any communication, meaning I have had to put my family out on several occasions, leaving them to fend for themselves. I've had to cancel medical appointments [without] notice because shifts have altered. On the rare occasion I'm actually asked to do extra shifts and I have to turn them down, I'm made to feel like a disappointment to the boss and then am asked less and less to do more hours. But my roster changes without notice more often. They force us into doing extra or different shifts. We are also only given access to the weeks roster (starting Monday) from the previous Thursday morning, giving us a very short amount of time to know the following weeks roster, which makes other commitments difficult to arrange.

Woman, elder carer, permanent part-time

No notice when needed for an extra shift. This morning I had 45mins notice & sometimes extra shifts are added without been asked.

Woman, carer, permanent part-time

Relying on being called in is a little stressful. With the lack of hours, I try to prepare my household's day so if I need to leave unexpectedly, everything is set & it will make everyone less anxious & prevent them contacting me when I'm working.

Woman aged 25 or under, carer, casual

I have repeatedly advised my manager that I am a carer and being given no notice on roster changes is very stressful.

Woman, carer of person with long term illness, permanent part-time

I work Sunday and Monday evenings so I can receive penalties this helps me be able to care for my mum and my children.

Partnered mother, elder carer, permanent part-time

27. The survey also asked SDA members about their perception of their retirement savings. Only 23% of members surveyed agreed that "I expect to have enough superannuation when I retire", and around half (51%) disagreed or strongly disagreed. There is also a gendered outcome as shown in **Error! Reference source not found.**; mothers had particularly low expectations of their retirement savings, being least likely to agree with the statement (18%) and most likely to disagree (57%). Fathers were also less likely to agree and more likely to disagree they would have sufficient superannuation, compared with other men¹⁶.

As a parent grandparent and care giver and full-time worker, and unfortunately divorced, I feel like I'm running on empty. But the bills have to be paid. I worry my super won't cover me enough in retirement, even though I pay extra into it. Stressful, and tiredness is never far away.

Grandmother, elder carer, permanent full-time

Am very concerned about the amount of superannuation & knowing that i will not be able to support myself when retired.

Woman, carer, permanent

¹⁶ Ibid, page 89

Discrimination for family and caring responsibilities and impacts on workforce participation, career progression and gender pay gaps

28. One of the key issues highlighted by the report is that workplace discrimination based on family and caring responsibilities, coupled with insecure and unpredictable rosters, is impacting women's work participation and career opportunities within the industry.
29. 28% of members turn down work activities or opportunities because of caring responsibilities, this is higher for parents (47%) and even higher for parents of children with a disability of additional needs (64%) and sole parents (53%).¹⁷
30. The report also shows that women are more likely to be providing care, so this is a gendered issue, impacting women more than men and resulting in adverse outcomes for women in terms of their participation in paid work and ability to earn an income and save for retirement.
31. Women undertake more unpaid work than men, they are more likely to take breaks in employment to provide care and more likely to work in part-time or casual roles to enable them to meet their caring responsibilities. All this impacts on gender equality at work and to the gender pay gap in varying degrees.
32. Better workplace entitlements and rights for carers will assist in improving gender equality in Australian workplaces and society.

Not sufficient consideration or support for carers, and Punishment and Repercussions for Care

33. A common theme of the Report was the lack of employer recognition of the employee's caring responsibilities and support to accommodate this. This exacerbates the impact that rostering practices already has on carers.
34. This also creates a significant barrier to carers accessing entitlements to leave and other supports such as flexible working arrangements, whether temporary or permanent.
35. Throughout the survey, participants regularly commented on the lack of recognition, care and support they receive in relation to their caring responsibilities from their employer and managers.

Doing a close then an open shift, means I get very little sleep and won't see the family for some time. Having to work every public holiday and weekend, means we can never do anything as a family. My shifts change at short notice, which means I have to cancel appointments.

Female, elder carer, permanent part-time

I have an autistic child and my manager doesn't understand how hard it is for myself to work outside of a schedule that I have set for the fortnight.

Woman, carer of person with disability, permanent part-time

¹⁷ Ibid, page 105

My workplace are often very inconsiderate to the personal needs to each of their employees. Often suddenly cancelling leave which was applied for and approved in the correct manner. They are extremely non-understanding when it comes to family emergencies. I have non-english speaking grandmother with Alzheimer-dementia who still lives at home and is often unpredictable. When extra care is needed I have been told to come to work and find someone else to deal with it.

Woman aged 25 years or less, carer for person with long term illness, permanent part-time

36. The Report found that *Workers often were made to feel bad for communicating their availability, refusing unsuitable shifts or taking leave, and described that they could be penalised by falling off the roster, or being offered less suitable shifts*¹⁸.

If I knock back shifts I'm told I'm unreliable and henceforth may not get future shifts.

Woman, elder carer, casual

Managers still make you feel bad for calling in sick or taking personal leave, and sometimes ask for medical certificates which are really hard to get when you're caring for someone.

Woman, carer for person with disability, permanent part-time

[There is] no respect for carers even if you're a really good employee. It's big business, [we are] easily replaced. They look at staff as an expense not an asset.

Woman, carer for person with long term illness, casual

37. The systemic flaws in rostering practices and attitudes of employers and managers to workers who provide care create barriers to access to leave and other supports that should be available to carers such as flexible working arrangements. The design of the entitlements, particularly flexible working arrangements is failing to deliver the outcomes for workers that they were designed to do, that is, supporting a worker to work and care.

What support do workers need to be able to work and provide care?

38. Workers provide valuable caring contributions that not only benefit the people they care for, but also contributes to our society as a whole and makes an enormous economic contribution which is not recognised or valued.
39. Our members provide care to older people in a variety of ways, some provide constant care to an older person who lives with them, but more typically our members provide regular care to an older person to assist them to live in their own home or in an aged care facility. Both forms of care should be supported through workplace entitlements.
40. For workers who need to take an absence from work for an extended period to provide constant care to an older person or person with a disability or temporary or terminal illness, the SDA supports the extension of unpaid carers leave for that purpose with a right for them to return to their position at the end of that period.

¹⁸ Ibid, Page 74

41. For some workers providing constant care to an older person, or someone with a disability or temporary or terminal illness a period of absence from work with the right to return to work following the period of care would be of great benefit. It would allow them the time to care, while maintaining their employment. This provision could give workers more choice when it comes to decisions about how they provide care. For some, the ability to return to their job at the end of the time needed to provide care would give them the freedom to make that choice as maintaining employment is a significant factor in the decision.
42. Whilst this may give employees more choice in relation to providing care, it may have the unintended consequence of creating another unpaid interruption in work participation for women, who this entitlement will be most used by, and we know that interruptions in paid work have consequences on women's income, lifetime earnings and retirement savings.
43. To counter the impact, a review of government payments that subsidise periods of unpaid care should be conducted, including the level of payment, which should be closer to the national minimum wage, and the payment of superannuation guarantee on carers payments.

Recommendation 1

Extend unpaid carers leave with the right to return to work under the NES for workers who need extended leave to care for an older person or someone or someone with a disability or temporary or terminal illness.

Recommendation 2

Review the adequacy of the government payments for carers, including the amount paid and the addition of payment of the superannuation guarantee.

44. For workers who provide ongoing, regular care, and need to do this while continuing to participate in paid work, the supports needed will be different. Regular care typically involves providing support in the home, for example, cooking, cleaning, shopping and other chores, and taking the older person to medical and other appointments. Some of this care is planned care, for example a regular day/s of the week, some is planned but impacts work that is rostered, such as medical appointments that cannot be scheduled outside of work time, and some is short notice care triggered by an emergency.
45. The type of care being provided by a worker will influence the type of workplace support they need. Better workplace support for carers will also influence the amount and type of care a worker is able to provide.
46. Improvements to the quantum of paid carers leave available, paying it at full replacement rate, extending it to casuals, broadening coverage for the purpose of providing care to those outside of the immediate family or household, and changing the evidentiary requirements for accessing carer's leave for those with an ongoing condition or need, would help to better support regular carers at work.
47. Carer's Leave forms part of the allocation of personal leave that a worker is entitled to, which is also for the purpose of taking time off in relation to the workers own health. As noted in our submission, and highlighted in the issues paper, many carers are in low-paid work, and not well resourced to take periods of unpaid leave to care for others. Many workers, particularly women, who provide regular care also exhaust or significantly reduce their leave balances because of the care they provide to others and have little to support them if they need to take absences that should be available to them when they need it due to their own ill-health.

48. To better support carers, the SDA recommends that the paid leave entitlement under the NES be increased for the purpose of providing care.

Recommendation 3

Increase paid leave entitlement for carers under the NES.

49. As evidenced in the SDA Who Cares? Report and the Issues Paper, carers are more likely to live in lower income households. This means that any financial detriment from taking personal leave to provide care for someone, can have a significant impact on their take home pay and their ability to meet their financial needs. This is particularly the case for workers in retail and fast food who rely on penalty rates to make ends meet.
50. The SDA Who Cares? Report found that *'Low hourly rates make penalty rates particularly important to workers' financial security. For this reason, participants were asked how strongly they agreed with the statement "I rely on penalty rates to make a living'.* Half of participants (50%) agreed with the statement, but this was slightly higher among couple parents (54%) and among sole parents (57%) (Table A.16). Interestingly, while 48% of casuals agreed that they rely on penalty rates, this was the case for 53% of permanent part-time workers, and 50% of permanent full-time employees (see Appendix Table A.17)¹⁹.
51. Given the strong reliance on penalty rates, any reduction in take home pay from taking personal leave, which is paid at the base rate of pay, exclusive of penalty rates, is a disincentive to provide care, but for most carers who have little choice it is more importantly a significant financial penalty for care giving which benefits not only the person being cared for but society and the economy more broadly.
52. No worker should be financially punished for providing care to others.

I have to work 3 weekends to make ends meet even though its my permanent roster if I am ill or have to care for family I lose my penalty rates when taking sick leave or personal leave. I don't think this is fair.

Woman, carer, permanent part-time, 45+ years

The reduction in take home pay on sick leave or long service leave deters me from utilising either of these to have a break from work to improve my mental wellbeing.

Woman, carer, permanent part-time, 55+ years

53. Individual carers provide a valuable economic contribution with the unpaid care they provide and should not be financially penalised for doing so, particularly low paid workers who rely on penalty rates to survive. Workers rostered during unsociable hours that attract penalty rates should be paid that rate when using any entitlements. Personal Leave should be paid at the full rate of pay, worked out as if the employee had not taken the leave rather than at the base rate of pay.

¹⁹ Ibid, page 85

Recommendation 4

Amend the rate Personal Leave is paid under the NES to payment at the employee's full rate of pay, worked out as if the employee had not taken the period of leave.

54. The Report also demonstrates that many SDA members employed as casual workers are providing high levels of care for others. This comes at a cost to their ability to participate in paid work and to their income.
55. The SDA believes that the casual workers should not be penalised financially for the care they provide to others and the economic benefit this contributes to our economy should be recognised. Paid carer's leave should be extended to casuals at the rate of pay they would have received had they worked.

Recommendation 5

Introduce paid carer's leave for casuals.

56. The entitlement to carers leave is also restricted to only cover instances of caring for immediate family members or members of the household. This leaves a gap for those who provide care to others in the community, whether it be extended family, friends and neighbours.
57. Access to carers leave should be extended to caring for anyone the worker provides care to, regardless of whether they form part of the persons household or immediate family. Families are not singularly defined. People may have different 'family' structures that don't fall into the traditional definition of immediate family and the provision of care to people they recognise as part of their family should also be supported.
58. The definition of Carer in the *Carer Recognition Act 2010 (Cth)* is broader than the definition of immediate family under the NES which is what underpins the personal leave provision in the *Fair Work Act 2009 (Cth)*. The SDA recommends that the definition of who a worker can provide care to for the purpose of receiving paid and unpaid personal leave be broadened in line with the carer definition under the *Carer Recognition Act 2010 (Cth)*.

Recommendation 6

Extend provisions for workers to access personal leave entitlements when caring for others outside of their immediate family or household, in line with the carer definition under the *Carer Recognition Act 2010 (Cth)*.

59. Evidence requirements under the Fair Work Act 2009 are also quite prescriptive, with employers given the ability to request fresh evidence on each occasion of an absence which can be any evidence that satisfies a reasonable person. This is typically a medical certificate or statutory declaration and can be required for an absence for an employee's own ill health or when caring for someone. This is a burden on those who provide regular care, particularly to someone with a known, ongoing condition.
60. This can be especially difficult when the need for care does not require a medical appointment, but a worker needs to take the older person they care for to the doctors just for the purpose of obtaining a certificate or find time to attend somewhere to get a statutory declaration signed. This creates a barrier for a worker to utilise their entitlements that support them to provide care. Getting a GP appointment at short notice is very difficult and is a high cost burden. Most GPs have an out of pocket expense of at least \$38. This is an additional financial punishment for providing care which either falls to the person needing the care or the worker providing the care.

Managers still make you feel bad for calling in sick or taking personal leave, and sometimes ask for medical certificates which are really hard to get when you're caring for someone.

Woman, carer, permanent, 26-40 years

61. In cases where the person is known to have a medical condition or is elderly and frail and may need emergency care from time to time, an employee should be able to provide enduring evidence to cover ad hoc absences over a period of time, instead of being required to provide fresh evidence on each occasion.
62. For example, if someone's elderly parent is known to have dementia and requires planned or unplanned care from time to time, the employee shouldn't need to provide a new certificate or statutory declaration each time, an enduring doctor's certificate or letter should suffice.

Recommendation 7

Amend the *Fair Work Act 2009* to enable an employee to provide evidence for absences that is recognised for an ongoing period rather than requiring evidence to be obtained separately for each absence, for example, letter from a medical practitioner.

63. While many members need to access either long term or ad hoc leave to support them to provide care to older people or people with a disability or temporary or terminal illness, most members need and choose to work while managing the care they provide.
64. SDA members attempt to do this by seeking rosters that allow them to provide care. They do this by giving employers availability outside of their caring responsibilities or by requesting flexible work arrangement, predominately a change to their regular pattern of work to support them to provide the care they need to give.
65. As discussed in this submission, and evidence by the *SDA Who Cares? Report*, SDA members face many barriers that prevent them from getting the support they need from their workplace.
66. The right for carers to request flexible working arrangements under the NES (Section 65) and the company policies that typically mirror this provision has not resulted in employees being supported with flexible working arrangements when they need them to provide care. The provision simply provides a worker with the ability to ask a question, it does not provide any substantive right for a worker who provides care to have the flexible working arrangements they need and there is no mechanism available for workers to challenge an employer's decision to refuse a request.
67. Employers are also able to deny a request on 'reasonable business grounds' which is a very low bar for an employer to have to satisfy and as our Report demonstrates, employers don't genuinely consider how they can accommodate flexible working arrangements. There should be a stronger requirement that an employer must accommodate the flexible working arrangement unless it would place an unjustifiable hardship on a person or the organisation to do so. There is a similar provision in relation to unjustifiable hardship in the *Disability Discrimination Act 1992 (DDA)*.

Most of the time I can negotiate my roster if I need to care for my Father. However when I was his regular carer I was sacrificing my annual leave to take him to appointments as it was at times difficult to swap a shift.

Woman, elder carer, permanent

68. There also needs to be a better right in the NES for employees with caring responsibilities to be able to reduce hours for a period of time, while maintaining a right to return to their previous hours. This would greatly support a worker to manage through a period of increased caring responsibilities while continuing to work. This would also be of benefit to an employer who may lose the employee if they are not able to do this.

Recommendation 8

Amend the *Fair Work Act 2009* to include a right for permanent employees with caring responsibilities to reduce their existing hours for a period of up to two years, and the right to revert to the existing hours at the end of that period.

69. Section 65 of the Fair Work 2009 should also be strengthened so that workers can genuinely access the flexible work they need to manage their work while they provide care.

Recommendation 9

Strengthen the 'right to request' provisions under s65 of the Fair Work Act 2009 (Cth) (FWA) by:

- **Removing the qualification requirements in section 65(2)(a) of the FWA (i.e., the requirement for 12 months' service)**
 - **Amending the grounds for employers to refuse flexible working arrangements from 'reasonable business grounds' to 'unjustifiable hardship' (similar to the *Disability Discrimination Act 1992*)**
 - **Introducing a positive duty on employers to reasonably accommodate flexible working arrangements (as in the *Victorian Equal Opportunity Act 2010*)**
 - **Establish an appeal process through the Fair Work Commission for decisions related to s65 of the Fair Work Act, the right to request flexible working arrangements, which is currently prohibited under S739 of the Act. This appeals process should not only address procedure but should include the ability for employees to appeal an employer's decision to refuse the request on reasonable business grounds.**
70. As demonstrated in the SDA Who Cares? Report, a significant barrier faced by our members when needing to providing care is the insecure and unpredictable rostering practices employed by retail and fast food companies. Rosters are often subject to frequent change, sometimes at short notice, and additional shifts, which members on low base contracts rely on to live are offered on an ad hoc basis and at short notice, all of which makes it nearly impossible for them to plan for their caring responsibilities.
71. The SDA Who Cares? Report found that *'Only two in five (40%) of participants work the same shifts each week 'all of the time'*. This means that three in five (60%) do not. Given that the retail industry employs 10% of all working Australians, this represents an enormous number of workers trying to manage unstable, unpredictable and insecure rosters while managing their life outside of work, including providing care to others.

72. Workers need better protections that provide more secure and stable hours of work, which are predictable and not subject to constant change. This is most important for workers who need to manage care outside of their rostered work.

They've changed my roster so I have to work every weekday at 5 hours a time which makes it difficult to care for my father who I have to see quite a few times a week which leaves me no time to relax.

Woman, elder carer, permanent

Business needs I'm told is the reason for the roster...they don't take into consideration your family and health needs...very much a take it or leave attitude.

Woman, carer, permanent

My hours were changed from early mornings to now between 8 and 6 pm. I needed those early shifts to be home to care for my mum who has Alzheimer's. Unfortunately the umbrella term 'operational changes' now means that (my employer) can change people's hours to avoid penalties.

Woman, elder carer, permanent

Recommendation 10

Amend the *Fair Work Act 2009* to provide improved rights for employees, and in particular carers, to:

- Predictable and stable rosters with fixed times and days
- Genuine consultation regarding rosters, and other changes to work arrangements

Recommendation 11

Amend S145A of the *Fair Work Act 2009* to require employers to genuinely consider employee views about the impact of proposed roster changes and to accommodate the needs of the employee.

73. Carers also need better protection from discrimination at work. The SDA Who Cares? Report demonstrated that not only do employers fail to genuinely consider an employee's caring needs or seek to accommodate them, but instead actively discriminate against workers who provide care and punish them for it.
74. Carers need better protection against discrimination at work because of their caring responsibilities. The *Sex Discrimination Act 1984* should be strengthened to provide a positive duty on employers to eliminate discrimination against workers with caring responsibilities, similar to the *Equal Opportunity Act 2010 (Vic)*.

Recommendation 12

Amend the *Sex Discrimination Act 1984 (Cth)* to include a positive duty on employers to eliminate discrimination as far as possible. (as in the *Equal Opportunity Act 2010 (Vic)*)



EXECUTIVE SUMMARY

Challenges of work, family and care.



FOR AUSTRALIA'S RETAIL,
ONLINE RETAIL, WAREHOUSING
AND FAST FOOD WORKERS

Executive Summary

This report provides information about the work, family and care arrangements of employees in Australia's retail, fast food and warehousing industries. Through the pandemic, these workers have been recognised for their essential contributions in maintaining safe access to food and other necessities for the community. Yet this recognition is not reflected in their employment conditions and supports; they remain low paid and lack access to the flexibility arrangements which assist workers in other industries to provide care to children and adults, and to manage work and family commitments.

To explore the challenges of managing work and family experienced by these workers, including their care for children and others, and their employment needs, Australia's largest private sector union, the SDA, the union for workers in retail, fast food and warehousing, commissioned this research from the Social Policy Research Centre at UNSW. Information comes from a national survey of SDA members, conducted in early 2021, which explored:

- workers' responsibilities to care for children and vulnerable adults;
- how workers arrange their care responsibilities while they are working; and
- the challenges arising from employers' working time practices and Australia's system of childcare provision.

Findings show that as well as making important economic and social contributions through their paid work, SDA members make valuable contributions through the unpaid labour they provide as parents, and as carers to children and adults in their families and communities. Yet these social and economic contributions are poorly recognised and accommodated in their working lives.

The data shows that:

- SDA members lack genuine choice about their working times and childcare arrangements and require better support structures, including access to responsive childcare services that recognise their needs, to ensure they have meaningful opportunities to shape their working and caring lives.
- Industrial relations settings and employer practices are limiting the choices and opportunities available to SDA members. Rostering and pay are shaped too strongly around employers' agendas of profitability and cost minimisation.
- The ways work is organised exacerbates difficulties faced by workers needing to organise their work and family lives, and find time for care. This impacts on the children of retail workers, many of whom cannot access early education and have constrained opportunities to fully participate in other aspects of social and community life.

Changes are needed at the level of industrial relations policy, and within employing organisations and local workplaces. Policy and regulatory changes should be aimed at promoting decent pay, job security, predictability of shifts, employees' control over work times, access to reasonable shift lengths, genuine choices about work days and times, and to ensure workers can make schedule adjustments without fear of repercussions. Changes are also needed in Australia's childcare system, to improve the affordability, accessibility and suitability of care for low-income workers.





Key findings

Care responsibilities

SDA members contribute unpaid care work that is essential to their families and communities.

- 55% of all participants said they regularly provide some form of care to another person, such as care to a child, grandchild, or to an older person, or a person with a disability or long-term health condition.
- This includes 39% who provide care to a child or young person under 18 (either in or outside their household). The vast majority of those caring for a child were doing so as parents. Indeed, 30% of survey participants were parents with a child under 18.
- 17% provide regular care to an older person, 10% care for someone with a long-term illness or health condition, and 9% provide regular care to a person with a disability.
- Australian Bureau of Statistics (ABS) data indicates that 1 in 9 Australians (11%) provide unpaid care to people with disability and older Australians.¹ The equivalent figure among SDA survey respondents is 24%.

"I can't use childcare until I have more regular work to accommodate childcare."

Partnered mother, casual

Complex care responsibilities

Many SDA members work and care in challenging circumstances.

- 25% of participants who are parents with a child under 18 said they are sole parents. This is high: sole parent families comprise around 14% of families in Australia.²
- 16% of parents with a child under 18 said they have a child with a disability or additional needs. While measured differently, ABS data indicates that in 2018, 77% of children under 15 had a disability.³
- 13% of survey participants aged 25 or under were young carers; that is, they are young people who provide regular care to an older person or adult with a disability or long-term health condition. This is much higher than in the wider population: the 2016 Census found that among people aged 15 to 24, 5.6% were young carers.⁴

Managing work and care

The survey shows the needs of retail workers, including parents and carers, are being left unmet by employers and employment regulations, and by Australia's childcare system.

- Many SDA members have contributed years, even decades of service to their employers. Yet their working time arrangements continue to be characterised by short, fluctuating hours, and precarious shifts. This impacts on mental health, constrains opportunities to provide care, and limits opportunities for families to spend time together.

"I made sure [my hours] would work with my family by being completely transparent and upfront about my needs. It was perfect up until recent new management, I'm constantly having to dispute my roster and my hours are getting cut because they can no longer work with my schedule. I feel like a burden, and I come home stressed out and exhausted."

Partnered mother, casual

Informal care

- Most parents use informal arrangements to care for their children while they are working. Among parents of children aged 12 or under, 9% used formal care services only, half (49%) used informal care only, and 42% used a combination of both.
- Care by a grandparent is particularly important. It enables mothers in particular to extend their working hours and earnings, and to reduce or avoid the costs of formal care. Among mothers with a child aged 12 or under, 30% used grandparent care each week and a further 10% used it most weeks. However, access to grandparent care cannot be assumed: over a third of mothers with a child under 12 (36%) did not report using grandparent care.
- As well as drawing on grandparent care, many SDA members are themselves providing care as grandparents. Among those aged over 50, 17% were providing regular unpaid care to a grandchild.
- Young workers also provide care. Among those aged 20 or under, 14% provided regular unpaid care for a younger sibling.

"Having my eldest son (13 years) watch my younger son after school allows me to work just a little bit longer each shift so I can afford bills etc; My parents don't charge if I need them to watch or pick up an unwell child."

Sole father, permanent part-time

Formal care services

- Use of early education and care services (ECEC) or formal childcare is most common among families with a pre-school aged child, however, it is usually used in combination with informal arrangements.
- Comments from workers highlight the ways some families have to make extraordinary efforts to co-ordinate family schedules around work and care, in ways that avoid or reduce their use of formal paid childcare or use of non-parental care. This is largely due to the cost of childcare, including the charging of fees in blocks which do not correspond well with working hours, and because childcare hours do not accommodate the non-standard hours which are prevalent in retail.
- A commonly mentioned challenge is the need to pay for a full day of long day care, even if a child attends only for short hours.
- Difficulties accessing childcare are resulting in inequitable participation in early education among children of SDA members. This can have enduring consequences for children's learning. Nationally, 95% of children participate in a preschool program for 15 hours per week before they start school.⁵ Among surveyed parents with a child starting school in 2022, 72% said their child attended at least 15 hours of long day care, preschool, or kindergarten, where they might receive a preschool education. 10% said they attended but for less than 15 hours, 12% did not attend, and 5% were unsure about attendance or hours.

"It is very hard to find a childcare in the weekends, evening etc. For people like us who do shift work, it is stressful to get."

Partnered father, permanent full-time

Even where SDA members use ECEC services, they experience difficulties.

- For those with a child 5 or under, the most common childcare difficulties were affording childcare (reported by 63% of participants engaged with formal services); coordinating work times with childcare (reported by 46% of those using formal services); finding childcare that fits work schedules (35%); and finding childcare at short notice (35%).
- For those with a primary school-aged child, the most common childcare difficulties were coordinating worktime with childcare (38%), affording childcare (37%) and finding childcare during the holidays (36%).
- Where childcare arrangements were perceived to work well, success was attributed to informal care arrangements, ability to co-ordinate work times within the family, and the predictability of shifts.

Labour supply

Difficulties accessing suitable childcare are reducing labour supply, and particularly impacting on the participation of women in the workforce and their working hours. This impacts on family earnings.

- Among parents with a child aged 12 or under, 43% of mothers and 35% of fathers reported wanting to work more hours, but access to suitable childcare is a barrier: 35% of mothers and 27% of fathers agreed with the statement "If I had suitable childcare, I would work more hours".
- A third of parents with a child 12 or under (33%) said they turn down extra shifts because they won't earn much more after tax and childcare costs.

"I changed my work hours so that I can be home during the day and my husband is home at night with the children. It was too hard trying to work around childcare and school and then what to do when someone is sick"

Partnered mother, permanent part-time

Parental leave

Paid parental leave helps support parents around the time of childbirth or adoption of a child, and when a child is very young. SDA members with a child aged 5 or under were asked about whether they had taken parental leave for their most recent birth, and the type of leave they used.

- The Australian Government's provision of Parental Leave Pay is the most important source of support for SDA members. Parental Leave Pay was the most common form of leave taken, reported by 72% of mothers and 34% of fathers with a child under 5. Although eligibility and the reasons for non-use are not clear from the data, the information nonetheless indicates that many SDA members have missed out.

Overall, 19% of parents of young children said they had not accessed any paid or unpaid leave for their last birth. This was higher for fathers (35%) than mothers (14%).

- Among parents with a child under 5, 19% of mothers and 47% of fathers had not received any paid leave to support their most recent birth.
- Comments on parental leave and transitioning back to work showed mothers faced challenges securing appropriate conditions when returning to work, and also felt they were missing important milestones in their children's lives.

"It was hard to jump straight back into full-time work (while) juggling a sick baby. No sick leave entitlements...was hard. I was made to feel like I had to get straight back into it full force or they would find someone to replace me."

Partnered mother of child with disability,
permanent part-time



Working time and rostering practices

SDA members described very poor working time security. Poor working time security affects all workers, and is very adverse for parents and others with caring responsibilities, impacting on their access to formal and informal care.

- Only two in five (40%) of participants work the same shifts each week 'all of the time'. This is higher for fathers (48%) and lower for mothers (37%).
- Although casual work is most unstable, many of those employed permanently report that their employment does not provide stable, predictable hours
- One in ten parents (10%) said they do not have regular work days.

Most workers report that rosters are set by a manager who they have regular contact with. Those who are satisfied with their working times frequently attribute this to 'luck' in having a good manager, rather than systemic practice. Workers described substantial challenges, including:

- working times which emphasise business priorities and do not accommodate personal needs and circumstances. These affect everyone but make life particularly difficult for workers with complex care responsibilities;
- low hours, short shifts and insecurity, contributing to underemployment and financial difficulties and stress.
- mismatch between working times and childcare availability;
- changing schedules, often at short notice and without adequate communication from employers;
- repercussions and being penalised, including loss of hours, when workers refuse shifts or seek to change them.

"We had to change our start and finish times on night fill so the company can save on penalty rates. We were not given a choice just told it was changing so all our contracts had to change too. There was no consideration for night fill members that have to pick their children up from school etc. Now we also get paid less because of this."

Sole mother, permanent part-time

Impacts on workers and families

Rostering practices contribute to financial difficulties in low-income families, make it difficult for families to access childcare, and make it difficult for families to spend time together. Rostering practices also prevent workers from working more hours. Employers' rostering practices add to parents' unpaid workload. Among those with a child aged 12 or under:

- 68% agreed or strongly agreed with the statement "When I get my roster, I have to check it fits with the family's childcare arrangements".
- 69% agreed their work times affect when other family members can work.
- 62% said they find it stressful to organise childcare around work times.

Rostering also impacts on family stress and the mental health of the worker and members of their family:

- Of those with a child 12 or under, 37% of mothers and 42% of fathers agreed or strongly agreed with the statement "The way I am rostered to work impacts on my mental health".
- 63% of parents with a child aged 12 or under agreed or strongly agreed that they worry about what's happening with their children whilst working (69% of mothers and 57% of fathers).
- Among mothers with a child below school age, those using formal childcare services were less likely to worry about their children compared with others, underlining the importance of formal childcare for alleviating maternal stress.

Financial security

Many workers find that low pay makes it difficult to meet the needs of their families.

- 55% of respondents live in households with post-tax income of less than \$1000 per week. 32% of couple parents and 80% of sole parents live in households with incomes under \$1000.
- A substantial proportion of parents caring for children find their wages are too low to meet their needs. 46% of parents in couple relationships and 56% of sole parents disagreed or strongly disagreed that they are satisfied with their take home pay.
- Many find they work fewer hours than they need. Only 20% of casuals agreed (or strongly agreed) that they work enough hours to make a living, as was the case for 29% of those employed on a permanent part-time basis. Problematically, only 57% of permanent full-time employees said they work enough hours to make a living, reflecting the low hourly rates received.
- Half of participants agreed that they rely on penalty rates to make a living (50%). This was not restricted to casuals, 53% of permanent part-time workers and 50% of those with permanent full-time hours said this was the case.
- Around a third of parents agreed with the statement 'I turn down extra shifts because I won't earn much more after tax and childcare costs'.
- Parents commented on difficulties of living on low incomes. They described trying to work hours that enabled them to contain childcare costs. Pay was seen as low given the nature and complexity of the work.
- While a quarter of participants (26%) were unsure about the adequacy of their retirement savings, around half (51%) disagreed with the statement 'I expect to have enough superannuation when I retire', and only 23% agreed.
- Mothers' expectations of retirement savings are particularly low: only 18% of mothers with a child under 18 agreed they would have enough superannuation when they retire.

"I'm a single mother that gets no child support and live week to week on my wages."

Sole mother of child with disability, permanent full-time

"It shouldn't be about working extra hours, it's about the hourly rate. 42 hrs per week to struggle paying bills!"

Sole father and carer of adult with disability, permanent full-time

Improving work and care

The research demonstrates that formal child care options and industrial relations regulations are not meeting the work and family needs of SDA members. In particular, rostering arrangements and low pay are impeding the ability of workers to organise the time needed to provide care for their children, extended families and communities. This is affecting children's access to early education and opportunities to participate in extra-curricular activities.

Reform is needed to improve working time arrangements in retail, fast food and warehousing industries, so that SDA members have control over their working hours and have predictable shifts so they can organise care and other aspects of their lives. Better job security and pay are also needed, to support all workers to fulfill their care responsibilities, and to enable families to engage with formal care services.

Changes are also needed to ensure child care is available to SDA members in ways that are affordable and suitable for their working hours. Childcare reform should be oriented around principles of children's universal rights to early education and care, to enable access for every child regardless of parents' incomes or employment arrangements.

This Executive Summary has been taken from the Who Cares Survey Report:
Challenges of work, family and care for Australia's retail, online retail, warehousing and fast food workers.

To view the entire report go to: www.national.sda.com.au/care



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Cortis, N., Blaxland, M., and Charlesworth, S. (2021). *Challenges of work, family and care for Australia's retail, online retail, warehousing and fast food workers.* Sydney: Social Policy Research Centre, UNSW Sydney.

¹ ABS (2019) Disability, Ageing and Carers, Australia: Summary of Findings
<https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release#carers>

² ABS (2020) Labour Force Status of Families
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³ ABS (2019) Disability, Ageing and Carers Australia: Summary of Findings
<https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/2018#children-with-disability>

⁴ ABS (2018) 2071.0 - Census of Population and Housing: Reflecting Australia - Stories from the Census, 2016
<https://www.abs.gov.au/ausstats/abs@nsf/Lookup/2071.0main+features1432016>

⁵ Through the Council of Australian Governments', all jurisdictions have agreed to aim to provide 15 hours per week of early education for all children in the year before school. This reflects that 15 hours is considered the minimum amount of learning needed to develop the skills needed for a successful start at school.



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Appendix B: Rationale for SDA policy positions

SDA policy is driven by providing value to our members whose work is regulated by a broken industrial framework. We seek an economic system that supports, protects and advances the interests of working people in this country.

Our predecessors built the conciliation and arbitration system which provided the foundations to our nations prosperity over a century ago, it is now our responsibility to build a system for the next generation.

Since the introduction of the Fair Work Act 2009 and subsequent radical changes to the financial and digital context inequality has grown and economic and political power has concentrated in the hands of a few.

We believe that fundamental not incremental change is needed. In contributing to policy, we seek to drive a new system that acknowledges the change that has occurred and will withstand the emerging world of work.

We engage in topics that help us drive this agenda and are guided by ten principles that we believe will create value for our members. Those principles are:

- 1. Address Inequality & Enshrine Fairness**
Minimum expectations must be set and adhered to.
- 2. Equity & Empowerment**
All workers must be supported to progress so that no-one is left behind.
- 3. Mobility & Security**
A socially successful economy must provide opportunity for all, regardless of their background. Systems must be built in a way that support success and adaptation in a rapidly changing world of work.
- 4. Delivering Prosperity & Growth For All**
A foundation for prosperity and economic growth must be achieved.
- 5. Protection in Work & Beyond**
Workplaces and the community must be healthy and safe for all workers and their families during and beyond their working lives.
- 6. Workers Capital & Superannuation**
Workers capital and superannuation must be an industrial right for all workers and treated as deferred earnings designed for dignity and justice in retirement.
- 7. A Strong Independent Umpire**
A strong, independent, cost effective and accessible industrial umpire and regulator must be central to the future system of work in Australia.
- 8. Protection & Support for Our Future**
Protecting and supporting our future requires a strong and vibrant retail industry and supply chain providing jobs with fair and just remuneration and contributing to the economy including through skilled workers.
- 9. Work & Community**
Work is a fundamental human activity that provides for personal, social and economic development. Work as it operates in community must build and protect a balance between life at work and life so that workers can contribute to society through the wider community.
- 10. Institutional Support for Collective Agents**
Institutional support must provide for collective agents (registered organisations) so that they are recognised, enshrined and explicitly supported as central to the effective functioning of the system.

Details of specific policy positions can be discussed by contacting the SDA National Office.

