



The Pharmacy
Guild of Australia

SUBMISSION

A case for an extended unpaid carer leave entitlement?

Comments by The Pharmacy Guild of Australia to The Productivity Commission's position paper

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National Secretariat

Level 2, 15 National Circuit, Barton ACT 2600
PO Box 310, Fyshwick ACT 2609
P: +61 2 6270 1888 • F: +61 2 6270 1800 • E: guild.nat@guild.org.au
www.guild.org.au



ABOUT THE GUILD

The Pharmacy Guild of Australia (the '**Guild**') is the national employer industry association representing owners of community pharmacies - which are small and medium businesses in cities, regional and remote areas across Australia. Community pharmacies are frontline health services and provide an ever-expanding range of professional health services to their local community.

Critical for the provision of these health services by the owners of Australia's 6,000 community pharmacies is a regulatory environment that supports the growth, success, and sustainability of their businesses.

Many Guild members employ 15 or fewer employees in a pharmacy. These small community businesses account for the direct employment of more than 70,000 full time, part time and casual employees in cities and towns Australia wide.

As a federally registered industrial organisation, the Guild develops workplace and business policy and shapes public debate on major workplace relations and business issues and advocates for a regulatory environment that supports investment in community pharmacy. We believe a healthy pharmacy sector means healthier communities.

GUILD RESPONSE

Australian Institute of Health and Welfare (AIHW) research indicates that the number of older Australians will continue to increase, with older people in Australia projected to be between 21% and 23% of the total population by 2066.¹

In 2018, the ABS stated that over half of those currently caring for an elderly relative for less than 20 hours per week were employed.² In considering whether to expand the unpaid carer leave entitlement, the Guild concurs with the Productivity Commission's findings that expanded unpaid carer's leave would be unsuitable for many carers.

The Guild acknowledges the potential financial impact on income and the often episodic nature of caring roles would not allow many carers to access a period of up to 12 months of unpaid carer leave.

The Carers Payment and Carer Allowance that can be accessed through Services Australia³ are often less than what a carer would have received if they had remained in paid employment.

The Guild recognises that an extended unpaid carer leave entitlement would potentially inflict costs on employers and affect businesses, through the disruption to their business operations, in recruiting and retaining replacement employees, and the uncertainty about a new employee's capability and productivity during this absence.

In specialised businesses that rely on highly skilled employees, it could be more difficult to find employees to replace an individual who is absence on extended unpaid carer leave. Rather, an alternative approach could be by accessing flexible working arrangements that meets by the employer and employee needs.

The Guild supports careful consideration of flexible working arrangements that allows a carer to continue their employment while providing care. The Guild suggests flexible working

¹ Older Australians, Demographic profile - Australian Institute of Health and Welfare (aihw.gov.au)

² Disability, Ageing and Carers, Australia: Summary of Findings, 2018 | Australian Bureau of Statistics (abs.gov.au)

³ Caring for elderly - Services Australia

arrangements, including changing hours of work, work location, and patterns of work (eg split shifts or job sharing), that would enable a carer to balance employment and their caring responsibilities. The positive impact on carers' wellbeing should be considered, as employment may allow respite from caring and assist carers in maintaining social connections.

Flexible working arrangements could assist employers in the recruitment and/or retention of employees, leading to lower recruitment and training costs and a reduction in fatigue and burnout from balancing employment and carer responsibilities. Employees who have the option of working flexibly could be more committed and engaged, possibly resulting in higher productivity⁴. With more than twice the number of females than men undertaking caring responsibilities⁵, this could potentially boost female workforce participation rates⁶.

The National Employment Standards (NES)⁷ already contains minimum standards that must be provided to all employees covered by the *Fair Work Act 2009* and exists to assist in balancing employment and carer duties, including flexible working arrangements. Recent legislative changes to strengthen the right to request flexible working arrangements in the NES come into effect in June 2023⁸. The Guild supports waiting for the findings of the review due to be completed in 2025, prior to making any decision on the introduction of an entitlement to extended unpaid carer leave.

⁴ <https://www.wgea.gov.au/tools/Developing-flex-policy>

⁵ <https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release#carers>

⁶ [Flexible work post-COVID | WGEA](#)

⁷ <https://www.fairwork.gov.au/employment-conditions/national-employment-standards>

⁸ <https://www.legislation.gov.au/Details/C2022A00079/Download>