

Dr Catherine de Fontenay  
Commissioner  
Productivity Commission  
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Dear Dr de Fontenay,

Thank you for including Carers NSW in this week's Productivity Commission stakeholder roundtable on carer leave. We were pleased to be a part of this important discussion, and particularly to hear more about the Productivity Commission's proposed direction.

Given your invitation to provide further submissions ahead of the release of the draft report, this brief submission outlines the key points we raised at the roundtable.

Firstly, with respect to the proposed objectives behind providing extended unpaid leave to carers of older Australians, it is Carers NSW view that the limited reach of this particular model primarily addresses the identified objective of 'improving attachment to the workforce'. We would urge caution in creating any expectations for this model to, as suggested: relieve pressure on the formal care system, improve the wellbeing of carers and the people they care for, or change societal norms about caring. However, should carer leave be extended to a larger group of carers, and include more flexible and holistic provisions as we recommended in our earlier submission, we believe these other objectives may be within scope.

Secondly, the hypothetical approach presented at the roundtable – involving between 3 and 12 months of unpaid leave, defined in advance with a minimum of 1 month's notice, available to employees after 12+ months of service – does appear to provide a fair balance of employee and employer interests. However, if applied to the limited pool identified of around 10,000 carers, Carers NSW is conscious that these parameters would likely further reduce the number of carers able to benefit from the provision. Expanding carer leave beyond this limited pool could ensure that these parameters have less of an adverse impact on eligibility and access.

Finally, the carer support sector representatives present were invited to provide further detail regarding what an appropriate level and form of evidence would be for demonstrating eligibility. Carers NSW believes that a structured template for completion by an authorised medical professional, with the option to attach supporting evidence such as an aged care assessment, would be appropriate for this purpose. For example, the original NDIS Access Request Form followed a similar format.

Carers NSW is reluctant, however, to provide further definitive feedback on the proposed model and the potential evidence required without consulting directly with carers on these important matters. It was mentioned that additional consultation would be welcomed by the Productivity Commission ahead of the release of the draft report in early 2023. Carers NSW coordinates a network of over 100 trained, volunteer carers who regularly participate in such consultations, and would be happy to assemble and/or request written feedback from a number of these Carer Representatives regarding these matters.

As the elements presented yesterday are yet to be finalised or shared publicly, we are open to the direction of the Productivity Commission as to whether this would be most helpfully conducted before or after the publication of the draft report. It is our opinion that seeking feedback on a specific model would result in more useful feedback from carers.

Thank you once again for your ongoing engagement with Carers NSW.

Yours sincerely,

Elena Katrakis  
CEO  
Carers NSW