

28 March 2023

Productivity Commission  
Locked Bag 2, Collins St  
East Melbourne  
VIC 8003

E: [carersleave@pc.gov.au](mailto:carersleave@pc.gov.au)

[ANMF letter in response to the Productivity Commission Position Paper  
'A case for an extended unpaid carers leave entitlement' 2023](#)

Dear Commissioners,

The Australian Nursing and Midwifery Federation (ANMF) wishes to provide this response to the abovementioned position paper in relation to a proposed entitlement to unpaid carers leave.

[About the ANMF](#)

The ANMF is Australia's largest national union and professional nursing and midwifery organisation. In collaboration with the ANMF's eight state and territory branches, we represent the professional, industrial, and political interests of more than 320,000 nurses, midwives, and personal care workers (PCWs) across the country. Approximately 89% of the ANMF's membership are women.

Our members work in the public and private health, aged care, and disability sectors across a wide variety of urban, rural, and remote locations. We work with them to improve their ability to deliver safe and best practice care in each one of these settings, to fulfil their professional goals, and achieve a healthy work/life balance.

[The Position Paper](#)

The ANMF thanks the Commission for the invitation to appear at the public hearings regarding the position paper.

In response to the position paper, the ANMF wishes to rely upon and reiterate the points outlined in our submission to the inquiry dated 9 September 2022. A copy of our submission is attached to this letter for your reference.

The ANMF wishes to express disappointment in the position paper published by the Commission.

---

**Melbourne Office**

Level 1, 365 Queen Street  
Melbourne VIC 3000  
Australia

T +61 3 9602 8500

F +61 3 9602 8567

E [anmffederal@anmf.org.au](mailto:anmffederal@anmf.org.au)

W [www.anmf.org.au](http://www.anmf.org.au)

---

**ANMF Journals**

Australian Nursing and  
Midwifery Journal (ANMJ)

E [anmjadmin@anmf.org.au](mailto:anmjadmin@anmf.org.au)

W [www.anmj.org.au](http://www.anmj.org.au)

Australian Journal of  
Advanced Nursing (AJAN)

E [ajan@anmf.org.au](mailto:ajan@anmf.org.au)

W [www.ajan.com.au](http://www.ajan.com.au)

ABN 41 816 898 298



Whilst the Commission has touched on the gendered nature of informal care, it has failed to engage in any substantive analysis of broader gender equity considerations that would emanate from an extended unpaid carers leave entitlement.

Notably, the Commission has failed to discuss the impact of another unpaid care-related entitlement on the perceived work value attached to care-based professions. Our submission went into great detail to advise the Commission of the impact of extended unpaid carers leave on the concept of work value for care-based professions, yet the Commission has determined this to be a seemingly irrelevant consideration in coming to their conclusions.

Additionally, the Commission has given little analysis to the impacts of unpaid care entitlements and how they exacerbate gender inequality markers, such as the gender pay gap and the retirement outcomes for working women, which generate significant economic and productivity costs to the Australian economy.

The analysis provided within the position paper demonstrates a distinct lack of understanding or appreciation of the objectives of Australia's industrial relations framework, the role it plays in advancing gender equality and how an extended unpaid care-based entitlement would undermine that function.

The Commission has also failed to adequately explore alternative ways to support informal carers; a key objective of the inquiry, expressly stated in the Terms of Reference.

The ANMF acknowledges that the Commission has highlighted the importance of workplace flexibility in supporting informal caregivers, however, it has failed to examine the adequacy of existing entitlements and/or alternative ways in which to frame an entitlement to workplace flexibility that may improve access to these arrangements.

The ANMF provided the Commission with alternative ways in which informal caregivers could be better supported, including a reframing of the right to flexible working arrangements, yet almost none of these have received any mention nor does it appear they have been explored in any way.

## Conclusion

The ANMF is disappointed with the adequacy of findings contained within the position paper published by the Commission.

Should the Commission reflect on the omissions we have identified and wish to address those in revised findings, the ANMF would welcome the opportunity to assist the Commission in doing so.

Yours Sincerely

Annie Butler  
Federal Secretary