Submission into the Review of the Paid Parental Leave Scheme

JULY 2013
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1. ABOUT ACCI

1.1 Who We Are

The Australian Chamber of Commerce and Industry (ACCI) speaks on behalf of Australian business at a national and international level.

As Australia’s largest and most representative business advocate, ACCI develops and advocates policies that are in the best interests of Australian business, economy and community.

We achieve this through the collaborative action of our national member network which comprises:

- all state and territory chambers of commerce;
- 30 national industry associations; and
- bilateral and multilateral business organisations.

In this way, ACCI provides leadership for more than 300,000 businesses which:

- operate in all industry sectors;
- includes small, medium and large businesses; and
- are located throughout metropolitan and regional Australia.

1.2 What We Do

ACCI takes a leading role in advocating the views of Australian business to public policy decision makers and influencers including:

- Federal Government Ministers and Shadow Ministers;
- Federal Parliamentarians;
- Policy Advisers;
- Federal Government public servants;
- regulatory authorities; and
- Federal Government Agencies.

Our objective is to ensure that the voice of Australian businesses is heard, whether they are one of the top 100 Australian companies or a small sole trader.
Our specific activities include:

- Representation and advocacy to Governments, parliaments, tribunals and policy makers both domestically and internationally;
- Representing business on a range of statutory and business boards and committees;
- Representing business in national fora including the Fair Work Commission, Safe Work Australia and many other bodies associated with economics, taxation, sustainability, small business, superannuation, employment, education and training, migration, trade, workplace relations and occupational health and safety;
- Research and developing policies relating to issues that concern Australian business;
- Publishing lead business surveys and other information products; and
- Providing fora for collective discussion amongst business on matters of law and policy.
2. INTRODUCTION

ACCI welcomes the opportunity to provide a written submission in relation to the review of the Australian Government’s Paid Parental Leave (PPL) scheme (Review) conducted by the Department of Families, Housing, Community Services and Indigenous Affairs (Department).

As the Department is aware, ACCI has been continually involved in the consultation process for developing and implementing the existing PPL scheme. As such, this submission should be considered as part of a body of material which collectively form ACCI’s considered position. This includes:

- consultations between ACCI and the Department which took place on 30 May 2013;
- the ACCI Submissions to the Productivity Commission’s Paid Maternity, Paternity and Parental Leave Inquiry (June and November 2008) (Productivity Commission Inquiry) (see Annexures A and B); and
- the ACCI Submission to the Senate Community Affairs Legislation Committee’s Inquiry into the Exposure Draft of the Paid Parental Leave Scheme Bill 2010 (May 2010) (Senate Inquiry) (see Annexure C).

ACCI members may make separate submissions to this Review on their own behalf. This submission is made without prejudice to ACCI or its members’ consideration of these matters or any submissions that they may make.
3. KEY ISSUES

3.1 Overview

3.1.1 ACCI restates its strong support of a government funded social security PPL scheme set at the level of the Federal Minimum Wage. Overall, the evidence and feedback by employers suggests that the scheme is generally working in a number of respects. However, amendments are required to ensure that the scheme does not impose unnecessary regulatory burdens or costs, particularly on small business.

3.1.2 In developing and implementing a finely balanced and well adapted PPL scheme, ACCI contends that the government should be guided by the following parallel policy objectives:

- Maximum impact for child-bearing employees and their spouses.
- Minimum impost of administrative and/or cost burdens on employers.

3.1.3 ACCI is concerned that the existing PPL scheme under the Paid Parental Leave Act 2010 (Cth) (Act) fails to satisfactorily align the above policy objectives and unnecessarily imposes a significant administrative and cost burden upon employers. Accordingly, ACCI reiterates the recommendations that it has previously made in its submissions to the Productivity Commission and Senate Inquiries.

3.1.4 In view of other proposed alternative PPL schemes, ACCI also records its opposition to any modified or alternate scheme which purports to entitle employees to PPL payments at their full replacement wage, particularly where the scheme is funded by a levy on business.
3.2 Paymaster obligations

3.2.1 Under the Act in its current form, employers are required to administer the payment of PPL instalments to eligible employees (Act, Part 3-2, Division 2) and comply with associated record keeping and notification obligations (Act, Part 3-2, Division 4).

3.2.2 ACCI submits that these ‘paymaster’ obligations are imbalanced, unjustifiably impose a significant compliance burden upon employers and are not supported by any proper policy basis. In other words, ACCI’s unequivocal view, based on the evidence available, is that the ‘paymaster’ function does not give effect to the government’s stated policy objectives and should be removed from the existing scheme.

3.2.3 From 25 February 2013 to 2 April 2013, ACCI distributed its 2013 triennial pre-election survey to a total of 1,700 businesses across every State and Territory, representing different business sizes and across all industries (Pre-Election Survey).¹ Of the 1,700 businesses surveyed, 1,096 were small businesses, 478 were medium sized businesses and 126 identified as large businesses. The results of the Pre-Election Survey therefore substantially reflect the views of small and medium enterprises (SMEs) across the Australian economy. A copy of the Pre-Election Survey is enclosed as Annexure D.

3.2.4 According to the Pre-Election Survey, 84.3% of businesses surveyed either agreed or strongly agreed that “the Government should not require employers to be the paymaster for the Paid Parental Leave scheme.”² Figure 1 below sets out a detailed breakdown of the responses.

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¹ Australian Chamber of Commerce and Industry (ACCI), ACCI Pre-Election Survey (May 2013).
² ACCI, ACCI Pre-Election Survey (May 2013), p 10.
3.2.5 A similar pre-election survey was conducted specifically for the small business sector, in order to understand current issues and challenges facing Australian SMEs (Small Business Pre-Election Survey) (see Annexure E). Of the 1,096 small businesses surveyed, 86.5% either agreed or strongly agreed that “the Government should not require employers to be the paymaster for the Paid Parental Leave scheme.” Figure 2 below similarly sets out a detailed breakdown of the responses.

### Figure 1

<table>
<thead>
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<th>Strongly agree</th>
<th>Agree</th>
<th>Neither agree nor disagree</th>
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### Figure 2

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3 ACCI, ACCI Small Business Pre-Election Survey (May 2013).
4 ‘Small business’ means an employer who employs fewer than 20 employees at the time of the survey.
5 ACCI, above n 3, p 6.
3.2.6 These statistics indicate that Australian businesses (and SMEs in particular) object to the overwhelming compliance burden associated with administering the PPL scheme. The ‘paymaster’ obligations are demonstrably inconsistent with the Government and then responsible Ministers’ commitment to “not support a system that imposes additional financial burdens or administrative complexity on small businesses...”\(^6\)

3.2.7 The results of the Pre-Election Survey and Small Business Pre-Election Survey are apparently inconsistent with the University of Queensland’s “Paid Parental Leave Evaluation: Phase 2 Report” (Evaluation), which found that “the costs to organisations for implementing the PPL were minimal.”\(^7\) ACCI makes the following observations into the Evaluation’s findings:

- The Evaluation conceded the difficulties in estimating “the total cost to the organisation necessary to implement PPL in dollars”.\(^8\)
- 30% of respondents indicated that more than 15 staff hours were needed to implement PPL.
- Most importantly, the Evaluation limited its assessment to the costs associated with implementing the PPL scheme and did not consider the ongoing paper and cost burden of administering the PPL payments.

Accordingly, the results of the Evaluation should not be relied upon to appreciate the impact of the ‘paymaster’ obligations under the PPL scheme.

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\(^7\) The University of Queensland, “Paid Parental Leave Evaluation: Phase 2 Report” (2013) [5.3.8].

\(^8\) Ibid.
3.2.8 In the report arising out of the Productivity Commission Inquiry, the principal policy rationale supporting the ‘paymaster’ obligations was that “structuring payments in this way would strengthen the link between the employer and employee, which should increase retention rates for the business (and lead to higher lifetime employment of women)”.

Designating employers as the ‘paymaster’ would supposedly reinforce an employer-employee feeling of loyalty and workplace attachment. This would, in theory, increase employee retention rates.

3.2.9 This proposition is a hypothesis and not borne out by the available data and direct feedback to ACCI. Based on ACCI’s extensive consultations with its member industry associations and business organisations, there is no proper basis that would credibly support this hypothesis.

3.2.10 Accordingly, ACCI reiterates its previously proposed recommendation that “[t]he Bill (now Act) should be amended so that the requirement for the employer to be the paymaster (apart from the Government to its own employees) be removed.”

3.2.11 In the alternative and in the interests of honouring its aforementioned commitment to SMEs, the Act should be amended to either:

(a) allow employees to opt in to the scheme on a voluntary basis; or
(b) create a “small-medium sized employer paymaster exemption”, based on either the annual turnover or the number of full-time equivalent employees.

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10 ACCI, Submission to the Senate Community Affairs Legislation Committee’s Inquiry into the Exposure Draft of the *Paid Parental Leave Scheme Bill 2010* (May 2010), [71].

*Department of Families, Housing, Community Services and Indigenous Affairs Review of the Paid Parental Leave Scheme*
3.3 Alternative schemes

3.3.1 ACCI notes that alternative PPL schemes have been proposed which purport to entitle employees to payment at their full replacement wage. Some of these schemes propose financing the enhanced PPL payments through a levy on businesses.

3.3.2 ACCI has repeatedly confirmed its support for a balanced PPL scheme, provided that it is government funded and administered, and is set at the level of the Federal Minimum Wage. However, if enacted, these particular proposed arrangements would exacerbate the already overwhelming compliance burden already shouldered by employers and SMEs in particular.

3.3.3 According to the Pre-Election Survey, “More than one in two businesses disagreed with the policy that the Government should fund the Paid Parental Leave Scheme based on parent’s real wage by imposing a levy on businesses (54.9 percent).” Figure 3 below sets out a detailed breakdown of the relevant responses.

**Figure 3**

<table>
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<td>39.5</td>
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3.3.4 In the Productivity Commission Inquiry report, the Commission examined various options to finance and deliver the then proposed PPL scheme.

3.3.5 The Commission recommended against direct employer financing of a PPL scheme, on the basis that it would “place most of the costs of the

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11 ACCI, above n 1, p 10.
scheme initially on those businesses with higher proportions of female employees.”

3.3.6 Whilst acknowledging that a pooled employer funding arrangement, which could involve the imposition of a levy on business, would avoid some of the problems associated with direct employer financing, the Commission conceded that the funding model:

... would involve adverse transitional impacts to firms until future rounds of wage negotiations, a comparatively high administrative and compliance burden and goes against the principle of tax simplification.

Importantly, levy funding would involve regular and ongoing administrative and compliance obligations on employers.

3.3.7 Accordingly, the Commission concluded that a pooled levy arrangement was a “relatively less effective means of financing the proposed paid parental leave scheme.”

3.3.8 Based on extensive consultations and discussions with member industry and business organisations, ACCI submits that any proposal to fund a PPL scheme based on the full replacement wage by imposing a levy on business is manifestly excessive and fails to satisfactorily balance the policy objectives set out in [3.2].

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12 ACCI, above n 1, [8.2].
13 Productivity Commission 2009, above n 7, [8].
14 Ibid, [8.3].

Department of Families, Housing, Community Services and Indigenous Affairs Review of the Paid Parental Leave Scheme
3.4 International comparison: New Zealand

3.4.1 In 2002, the New Zealand government introduced a PPL scheme which ACCI maintains is the most appropriate model to which the existing Australian PPL scheme could emulate. Broadly, the New Zealand scheme comprises the following salient features:

- 100% funded and administered by government (Inland Revenue Department).
- Eligible for birth mother or adoptive parent after a qualifying period of continuous service with the same employer.
- Paid at the rate of the employee’s ordinary weekly pay or average weekly earnings (whichever is greater), up to a maximum payment (currently, $475.16 per week) and subject to taxation. This represents approximately 86% of New Zealand’s current minimum wage ($550.00 per 40 hour week).
- Superannuation contributions are not mandatory for employers.
- Paid up to 14 weeks from the commencement of the period of leave until the employee returns to work or his or her employment is terminated.
3.4.2 For present purposes, it is noteworthy that under the New Zealand PPL scheme, the government acts as both the paymaster and funding entity. An evaluation of the scheme conducted by the Department of Labour in 2005/6 found that overall, “the scheme enjoys considerable support from mothers, fathers, and employers alike.”¹⁵ A copy of the evaluation is enclosed as Annexure F.

3.4.3 Nowhere in the evaluation was any case substantiated that proposed to transfer the ‘paymaster’ role from the government to individual employers. To date, the New Zealand government has not been satisfied of any compelling policy rationale to amend their ‘paymaster’ provisions accordingly.

3.4.4 ACCI proposes that the Australian government consider adopting key elements of the New Zealand PPL scheme and in particular, amending the Act to transfer the ‘paymaster’ obligations from individual employers to government.

3.5 Statistical analysis

3.5.1 For the purposes of this submission, ACCI reviewed the female workforce participation rate before and after the introduction of the PPL scheme. Figure 4 below demonstrates that since May 2008, the rate has remained relatively constant.

![Figure 4](image)

3.5.2 Figure 5 below indicates that from May 2003 to February 2009, the female workforce participation rate increased by three percentage points from 56.2% to 59.2%. In contrast, since February 2009, there has been an actual net decrease in the female participation rate from 59.2% to 58.8%.
3.5.3 The Regulation Impact Statement set out in the Explanatory Memorandum to the then Paid Parental Leave Bill 2010 (Cth) noted the lower participation rates for women during their “prime reproductive ages”.\textsuperscript{16} Specifically, the Explanatory Memorandum drew attention the following discrepancy:

...in 2005, labour participation rates for females aged 25-44 years were more than 80 per cent in Sweden, Iceland, Denmark and Finland, compared with less than 75 per cent in Australia.

...A carefully designed scheme may also help encourage greater female labour force participation before and after birth. This is unlikely to occur without intervention by the Australian Government.\textsuperscript{17}

\textsuperscript{17} Ibid, emphasis added.
3.5.4 Notwithstanding intervention by the Australian Government in the form of the PPL scheme which is the subject of these submissions, the workforce participation rate for unmarried women between the ages of 25 and 34 remains well below 75 per cent, with no meaningful change from the rate at April 2008. This is reflected in Figure 6 below.

Figure 6

3.5.5 The above claims that the PPL scheme in its current form has had a significant impact on the female workplace participation rate cannot be credibly sustained at this stage. It also suggests that the ‘paymaster’ function does not influence, in a significant manner, enhanced workforce participation.

3.5.6 ACCI suggests that other policy considerations, such as the increased availability and affordability of childcare, would have a more positive impact on workforce attachment, than designating employers to be the paymasters and administrators of the PPL scheme on behalf of the government.

3.5.7 Feedback to ACCI suggests that the PPL scheme also needs to modify the level of complexity for employees also. Multiple examples provided to ACCI by its members include employers spending up to an hour helping
employees complete the prescribed PPL documentation. Clearly, it is self-evident that this level of complexity embedded within the PPL system is not in the interest of employers or employees.
### 4. ACCI MEMBERS

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<td>AUSTRALIAN MADE, AUSTRALIAN GROWN CAMPAIGN</td>
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