



Paid Parental Leave Amendment (Improvements for Families and Gender Equality) Bill 2022

January 2023



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Our commitment to inclusion

The Salvation Army Australia acknowledges the Traditional Owners of the land on which we meet and work and pay our respect to Elders, past, present and future.

We value people of all cultures, languages, capacities, sexual orientations, gender identities and/or expressions. We are committed to providing programs that are fully inclusive. We are committed to the safety and wellbeing of people of all ages, particularly children.

Our values are:

- Integrity
- Compassion
- Respect
- Diversity
- Collaboration

Learn more about our commitment to inclusion:
salvationarmy.org.au/about-us

The Salvation Army is an international movement and our mission is to preach the gospel of Jesus Christ and to meet human needs in his name without discrimination.





List of Recommendations

Recommendations

1. The Commonwealth Government trial a shared parental leave scheme equal to one year of paid leave at full wage replacement, to be shared equally between parents.
2. The flexibility intended by the Bill be supported by a single-family application form.
3. The Commonwealth Government implement family and domestic violence training for frontline staff responsible for obtaining verbal permission from the birth parent before the non-birth parent becomes the primary PLP claimant.
4. The Commonwealth Government implement the 'new law' reflecting PPL amendments according to a family's chosen PPL commencement date.



Introduction

The Salvation Army thanks the Senate Standing Committee on Community Affairs for the opportunity to provide a submission to the inquiry of Australia's *Paid Parental Leave Amendment (Improvements for Families and Gender Equality) Bill 2022* (The Bill).

The Salvation Army welcomes the Commonwealth Government's amendments to the Bill to make Paid Parental Leave (PPL) more accessible, flexible and gender neutral. This lays the groundwork to extend PPL to 26 weeks. The Salvation Army believes this is a significant step toward not only improving PPL in Australia, but also achieving gender equality in Australia.

Women are over-represented in almost all the services The Salvation Army provides. We believe that for many women, entering into parenthood is where the gender pay gap worsens. Failure to encourage gender equity has contributed to significant long-term disadvantages for women, including the superannuation gap and older women becoming the fastest growing homeless cohort in Australia. According to the Workplace Gender Equality Agency, in 2015-16, the average balance of men's superannuation was almost double the balance of the average woman's, demonstrating a 38.8% superannuation gap¹.

The introduction of the Commonwealth Government's PPL across the nation in 2011 has had a positive impact in many ways including by enhancing health outcomes for children and parents and encouraging workforce participations for women, however, there remain considerable gaps. These challenges contribute further to disadvantage experienced by carers, overwhelmingly women. We believe that this inquiry presents the opportunity to further improve the Parental Leave Payment (PLP) to work towards further enhanced workforce participation for women, reduce economic disparities between men and women, improve gender equity and also improve wellbeing outcomes for parents, carers and children.

This submission has been drafted to follow the structure of the proposed main amendments as outlined in the Bill, and to provide insights where we believe The Salvation Army has valuable input to contribute. This submission outlines the financial implications, and challenges faced by parents and carers as we understand them, and the barriers for parents and carers when accessing PPL in Australia. We also outline potential considerations and recommendations which we believe could contribute to an improved PPL entitlement, whilst challenging gender norms that lead to inequity.

¹ Workplace Gender Equality Agency. (Undated). *Superannuation & gender pay gaps by age group*. <https://www.wgea.gov.au/publications/superannuation-gender-pay-gaps-by-age-group>





Current Policy Concerns

Since its implementation in January 2011, the PPL entitlement has achieved significant benefits for primary carers of children, including:

- a period of paid leave at the national minimum wage to many parents and carers who up until its implementation, either had no paid leave, or minimal paid leave entitlements through their employer;²
- improved child development and maternal health and wellbeing; and³
- a small though significant increase in women returning to a previous working role, and therefore contributing to mothers' health, wellbeing and workforce participation.⁴

Australia must build on these gains if we want to improve mothers' workforce participation, encourage fathers' involvement in the home and achieve gender equity. Without further reform, the positive impacts achieved to date are stalled by persistent gender stereotypes and stigmas affecting women's and men's preferences around their work and caring responsibilities.

We know that women tend to work fewer hours in comparison to men, based on factors which assume by default that a women will take primary responsibility or a greater share of caring responsibilities, including:

- women carrying a disproportionate share of unpaid caring and domestic work;
- women taking greater periods of time out of the workforce to raise children; and
- a lack of workplace flexibility to accommodate caring and other responsibilities when returning to the workforce, often on a part-time basis - also true for men as carers.⁵

According to the Workplace Gender Equity Agency (WGEA), women currently account for 47.9 per cent of all employed persons in Australia.⁶ More specifically, 26.3 per cent of all employed persons are women working full-time, and 21.6 percent working part-time.⁷ Female-dominated industries are comprised of mostly part-time employees, in comparison to male-dominated industries which are comprised of a majority of full-time employees.⁸ Before the COVID-19 pandemic, the labour force participation rate for women aged 20 to 74 was 67.6 per cent (compared to 78.1 per cent for men), the highest rate in 10 years.⁹ The gender divide is even more pronounced for parents of children under six years old. Compared to the general population, mothers are less likely (65.5 per cent) and

² Baird, M., Hamilton, M., & Constantin, A. (2021, May 2). Gender equality and paid parental leave in Australia: A decade of giant leaps or baby steps? *Journal of Industrial Relations*, 63(4), 1-22

<https://www.parliament.nsw.gov.au/lcdocs/other/15907/Prof%20Rae%20Cooper%20-%20Att%202%20-%20Baird,%20Hamilton%20and%20Constantin%20JIR%202021.pdf>

³ Ibid.

⁴ Ibid.

⁵ Wood, D., Emslie, O., and Griffiths, K. (2021, September). *Dad days: how more gender-equal parental leave would improve the lives of Australian families*. Grattan Institute. <https://grattan.edu.au/report/dad-days/>

⁶ Workplace Gender Equality Agency. (2022, February 24). *Gender Equality Workplace Statistics at a glance*.

<https://www.wgea.gov.au/publications/gender-equality-workplace-statistics-at-a-glance-2022>

⁷ Ibid.

⁸ Workplace Gender Equality Agency. (2022, December 12). *WGEA Scorecard 2022: The State of Gender Equality in Australia*.

<https://www.wgea.gov.au/sites/default/files/documents/WGEA-Gender-Equality-Scorecard-2022.pdf>

⁹ Australian Bureau of Statistics. (2020). *Gender Indicators, Australia*. <https://www.abs.gov.au/statistics/people/people-andcommunities/gender-indicators-australia/latest-release>



fathers much more likely (94.4 per cent) to be in paid work.¹⁰ These factors in turn contribute to and are reflected in Australia's gender pay gap – which is currently sitting at 14.1 per cent.¹¹

The current PPL policy is not set up to further support the participation of women within the workforce. For example, the 18 weeks which can be accessed by mothers under PLP must be taken in one continuous block, inhibiting mothers' ability to engage in the workforce throughout this period due to lack of flexibility within the scheme.

Despite being titled 'Parental Leave Pay,' the PLP scheme explicitly targets the 'birth parent', though under certain conditions can be transferred partly or fully to the non-birth parent. The WGEA found that between 2020 and 2021, women accounted for 88 per cent of all primary carer leave, and men for 12 per cent,¹² demonstrating that women continue, despite the ability to transfer leave, to take the majority of PPL and time out of the workforce.

The Salvation Army believes that a key part of the solution to the 'motherhood penalty' and disadvantages to women in the workforce, is to address the real or perceived stigma that presents a barrier to fathers taking time off to care for children.

The 'Motherhood Penalty'

The systematic disadvantage and discrimination that women encounter in the workplace when they become mothers is sometimes referred to as the 'motherhood penalty'. This not only has immediate impacts on women in caring roles, but long-term economic losses and disadvantage.

The 2019 HESTA Vital Signs report attributes the cost of having children – the 'motherhood penalty' – to a direct loss of income and superannuation and indirect losses in promotion and wage increase opportunities of at least five to 10 per cent of wages.¹³

Recent Treasury research suggests that this could amount to as much as a 55 per cent reduction in income in the first five years for mothers who reduce working hours and take time out of the workforce, when compared to what they were earning prior to giving birth.¹⁴ There is some evidence that it affects all people with caring responsibilities, not just mothers.¹⁵

Further, the recent Retirement Income Review recognised that Australian women's lower average superannuation levels are a result of the 'accumulation of economic disadvantages faced by women in working life, particularly the gap in earnings and time spent in the workforce'.¹⁶

¹⁰ Ibid.

¹¹ Workplace Gender Equality Agency. (2022, August 18). *Gender workplace statistics at a glance*. <https://www.wgea.gov.au/sites/default/files/documents/2022-08-18%20Stats%20at%20a%20glance%20FINAL%20V1.2.pdf>.

¹² Workplace Gender Equality Agency. (Undated). *Parental Leave*. <https://www.wgea.gov.au/parental-leave#:~:text=According%20to%202020%2D21%20WGEA,access%20to%20paid%20parental%20leave.>

¹³ HESTA. (2019). *Vital Signs*. <https://www.hesta.com.au/content/dam/hesta/Documents/HESTA-Vital-Signs-Report.pdf>.

¹⁴ Priestley, A. (2022, July 13). "The cost of being a mother is significantly higher than being a father in Australia." *Women's Agenda*. <https://womensagenda.com.au/latest/the-cost-of-being-a-mother-is-significantly-higher-than-being-a-father-in-australia/>.

¹⁵ Australian Human Rights Commission. (2007). Chapter 3: Legal protection for workers with family and carer responsibilities. *It's About Time: Women, men, work and family*. <https://humanrights.gov.au/our-work/its-about-time-chapter-3>.

¹⁶ The Australian Government the Treasury. (2020). *Retirement Income Review: Final report*. <https://treasury.gov.au/sites/default/files/2021-02/p2020-100554-udcomplete-report.pdf>.



In 2015-16, women aged 65 to 69 had a median balance of less than \$10,000 and 45 per cent reported no superannuation balance at all.¹⁷ Women approaching retirement (aged 55 to 64) had a median balance of less than \$100,000, less than a fifth of the amount the Association of Superannuation Funds of Australia (ASFA) estimates needed for a comfortable retirement.¹⁸

Whilst outside of the scope of the Bill, we suggest that part of the solution could be for the Commonwealth Government to contribute the superannuation guarantee (10.5 per cent as of 1 July 2022) to participants on the Government's PLP scheme. Assuming mothers work another 30 years after the birth of their child, this could mean more than \$6,000 in retirement savings, based on the current PLP rate of \$162.49 per day before tax.¹⁹

We also suggest that employers and the Commonwealth Government could contribute superannuation during periods of care-related leave, as recommended by the Productivity Commission's 2009 report into parental leave.²⁰ With women making up 60 per cent of the Australian Public Service and as the funder of many programs and services provided by female-dominated industries²¹, the Commonwealth Government is well-placed to lead by example. We suggest that superannuation be made mandatory for all paid and unpaid care-related absences.

¹⁷ Clare, R. (2017). Superannuation account balances by age and gender. ASFA Research and Resource Centre. https://www.superannuation.asn.au/ArticleDocuments/359/1710_Superannuation_account_balances_by_age_and_gender.pdf.aspx?Embed=Y.

¹⁸ Pennington, A. & Stanford, J. (2020). *Gender Inequality in Australia's Labour Market: A Factbook*. Centre for Future Work. <https://apo.org.au/node/277671>.

¹⁹ Services Australia. (2022). *Parental Leave Pay – How much you can get*. Services Australia. <https://www.servicesaustralia.gov.au/individuals/services/centrelink/parental-leave-pay/how-much-you-can-get>.

²⁰ Productivity Commission. (2009). *Paid Parental Leave: Support for Parents with Newborn Children (Inquiry Report No. 47)*. <https://www.pc.gov.au/inquiries/completed/parental-support/report/parental-support.pdf>. See also: Women in Super. (n.d.).

Superannuation and Paid Parental Leave. Women in Super. <https://www.womeninsuper.com.au/content/superpaid-parental-leave/gjuqup>.

Riach, K., O'Hare, C., Dalton, B. & Wang, C. (2018). *The Future Face of Poverty is Female*. Australian Super.

²¹ Australian Public Service Commission. (2021). *Delivering for Tomorrow: APS Workforce Strategy 2025*.

https://www.apsc.gov.au/sites/default/files/2021-03/APS_Workforce_strategy.pdf.





Extending Parental Leave Pay

The Salvation Army welcomes the Commonwealth Government's amendments to extend Parental Leave Pay (PLP), combine Dad and Partner Pay (DaPP) with PLP, and the use of 'Use it or Lose it' incentives. The following amendments could further strengthen these proposed changes.

Additional Weeks

The Salvation Army welcomes the Government's plan to extend the PPL scheme to a period of 26 weeks by July 2026. The proposed 26 week leave entitlement corresponds with the period of time that the World Health Organization recommends that mothers should exclusively breastfeed.²² Of the 34 Organisation for Economic Development (OECD) countries, 25 countries guarantee at least six months' paid leave for mothers and 21 countries do the same for fathers.²³

The recently released Grattan Institute report on gender-equal parenting supports this enhancement of the current 20-week paid parental leave scheme and further called upon the business community to no longer require fathers to negotiate unpaid leave from their employers in order to get government parental leave.²⁴ The same report suggested that private sector initiatives could be bolstered by complementary government schemes that encourage more employers to 'normalise' fathers taking leave.²⁵

The Salvation Army urges the Commonwealth Government to consider increasing the PPL timeframe. Both mothers and fathers need enough time with their children to develop skills in caring for and forming attachments with them, and to ensure mothers are able to maintain a connection to the workforce. This need is not met through current paid parental leave policies.

The Parenthood's report, *'Making Australia the best place in the world to be a parent'* contains more detail on the benefit to child wellbeing, women's workplace involvement and Australia's economy.²⁶ The report supports one year of shared parental leave in order to improve child outcomes, shift cultural caregiving norms, and ultimately improve disparities in economic outcomes between men and women.²⁷ Recognising this as a significant departure from current policy we recommend that a pilot be undertaken to test the impact of an increased PPL period.

²² Raub, A., Nandi, A., Earle, A., de Guzman Chomy, N., Wong, E., Chung, P., Batra, P., Schickedanz, A., Bose, B., Jou, J., Franken, D., & Heymann, J. (2018). *Paid Parental Leave: A detailed look at approaches across OECD countries*. WORLD Policy Analysis Center.

²³ Ibid.

²⁴ Wood, D., Emslie, O., and Griffiths, K. (2021, September). *Dad days: how more gender-equal parental leave would improve the lives of Australian families*. Grattan Institute. <https://grattan.edu.au/report/dad-days/>.

²⁵ The Parenthood. (2021). *Making Australia the best place in the world to be a parent*. https://d3n8a8pro7vnm.cloudfront.net/theparenthood/pages/669/attachments/original/1613473151/Final_Report_-_Making_Australia_The_Best_Place_In_The_World_To_Be_A_Parent.pdf?1613473151.

²⁶ The Parenthood. (2021). *Making Australia the best place in the world to be a parent*. https://d3n8a8pro7vnm.cloudfront.net/theparenthood/pages/669/attachments/original/1613473151/Final_Report_-_Making_Australia_The_Best_Place_In_The_World_To_Be_A_Parent.pdf?1613473151.

²⁷ Ibid.



Recommendation

1. The Commonwealth Government trial a shared parental leave scheme equal to one year of paid leave at full wage replacement, to be shared equally between parents.

Combined Payments and Incentivising Fathers to take Paid Parental Leave

The introduction of the Dad and Partner Pay (DaPP) payment in 2013 was a significant amendment to the PPL scheme. The entitlement offered fathers and non-birth parents increased opportunity to be present for the early weeks of their child's life²⁸. According to a report by The Grattan Institute, the uptake²⁹ of DaPP has been found to be only half of that of PLP, representing a mere one quarter of new fathers and non-birth parents.^{30 31} Some of the limitations that may impact uptake of this payment include:

- the payment is at minimum wage, which may act as a disincentive, particularly in the context of increased costs of living. Families may be unable to afford to have two carers take time off work, or only receive minimum wage;³²
- the DaPP must be taken in a single block, limiting flexibility in using the leave;³³
- the administrative burden of applying for the payment at minimum wage may be considered too high; and³⁴
- ongoing stigma attached to working fathers accessing flexible work or caring leave options may impact non-birth parents requesting to take time off work following the birth of a child.³⁵

Whilst the DaPP was intended to encourage fathers and non-birth parents to take leave around the birth of their child, analysis by WGEA identifies that gender norms and stereotypes continue to be a barrier to fathers taking leave and the need for workplace cultural change.³⁶ WGEA has produced a guide for organisations wishing to design more gender equitable parental leave policies.³⁷

The Salvation Army welcomes the combining of the DaPP and the PLP into one flexible entitlement of up to 20 weeks. This will provide parents and carers the autonomy and ability to better manage

²⁸ Baird, M., et al. (2021, May 2). Gender equality and paid parental leave in Australia: A decade of giant leaps or baby steps? *Journal of Industrial Relations*, 63(4), 1-22 <https://www.parliament.nsw.gov.au/lcdocs/other/15907/Prof%20Rae%20Cooper%20-%20Att%20%20-%20Baird,%20Hamilton%20and%20Constantin%20JIR%202021.pdf>.

²⁹ Wood, D., Emslie, O., and Griffiths, K. (2021, September). *Dad days: how more gender-equal parental leave would improve the lives of Australian families*. Grattan Institute. <https://grattan.edu.au/report/dad-days/>.

³⁰ Australian Government, Department of Social Services (2019) *Annual Report 2018–2019*. Department of Social Services, Australia. <https://www.transparency.gov.au/annual-reports/department-social-services/reporting-year/2018-2019-1>.

³¹ Workplace Gender Equality Agency. (2019, September 3). *Designing and Supporting Gender Equitable Parental Leave*. <https://www.wgea.gov.au/publications/gender-equitable-parental-leave#challenges>.

³² Ibid.

³³ Baird, M., et al. (2021, May 2). Gender equality and paid parental leave in Australia: A decade of giant leaps or baby steps? *Journal of Industrial Relations*, 63(4), 1-22 <https://www.parliament.nsw.gov.au/lcdocs/other/15907/Prof%20Rae%20Cooper%20-%20Att%20%20-%20Baird,%20Hamilton%20and%20Constantin%20JIR%202021.pdf>.

³⁴ Ibid.

³⁵ Ibid.

³⁶ Workplace Gender Equality Agency. (2019, September 3). *Designing and supporting gender equitable parental leave (Insight Paper)*. https://www.wgea.gov.au/sites/default/files/documents/Insight_paper_designing_and_supporting_gender_equitable_parental_leave.pdf.

³⁷ Workplace Gender Equality Agency. (n.d.). *Gender equitable parental leave: A guide for organisations*. https://www.wgea.gov.au/sites/default/files/documents/Guide_gender_equitable_parental_leave.pdf.





working and caring responsibilities between them. The proposed change to allow families to nominate a primary claimant provides for families to consider alternatives to the default assumption that the mother will take primary and sole responsibility for childcare, which acts as a barrier to parents sharing care, and mothers returning to work. A more even distribution of childcare responsibilities has the potential to enhance women's workforce engagement and reduce the long-term negative impacts of the 'motherhood penalty'. To overcome the current disincentive to apply for DaPP, it is important that families have the option to complete a single form for PLP, and that this form be simplified as much as possible.

Alongside enhancing opportunity for women, the combining of the payments is a policy gain for gender equity. We believe the amendment and abolishment of DaPP and its replacement within PLP would encourage fathers to take leave, and act to reduce the stigma around this by offering the potential for increased leave entitlements, and enhanced flexibility in relation to time off from the workplace.

Further, we support the use of 'use it or lose it' weeks as incentives for fathers under the PPL scheme. Additional incentives for fathers to use their leave entitlements are a feature of father-targeted leave schemes in many countries,³⁸ with research demonstrating that the use of 'use it or lose it' entitlements were one of the incentives which increased father's uptake of parental leave schemes.³⁹

Recommendation

2. The flexibility intended by the Bill be supported by a single-family application form.

³⁸ Baird, M. (2021, September 7). The Use of Data in the Making and Monitoring of Parental Leave in Australia. *Law in Context*, 37(2), 62-73.

³⁹ Wood, D., Emslie, O., and Griffiths, K. (2021, September). *Dad days: how more gender-equal parental leave would improve the lives of Australian families*. Grattan Institute. <https://grattan.edu.au/report/dad-days/>.



Gender-Neutral Claiming

Both birth- and non-birth parents need enough time with their children to develop skills in caring for and forming attachments with them, whilst maintaining a connection to the workforce. This need is not met through most current paid parental leave policies.

We support the Bill's amendment to allow non-birth parents to apply for PLP without the birth-parent being required to make a claim. We believe that this amendment alongside combining the DaPP and PLP supports international research which has shown the benefit of non-birth parents taking parental leave in enabling a more equal division of work between women and men⁴⁰ and a smoother transition back to work for mothers.⁴¹ Studies have also shown benefits for child health and development.⁴²

Equal uptake of parental leave also has the potential to combat workplace discrimination by reducing employers' reluctance to hire, retain and promote mothers or women of parenting age.⁴³

Safeguarding the Permission Process for Claims

Women Experiencing Domestic and Family Violence

The Salvation Army welcomes the Bill's consideration of the impact that amendments to the PLP may have on women in the community experiencing family and domestic violence. We support the requirement that permission from the birth parent be sought when the non-birth parent becomes the primary claimant.

Our services often assist victim-survivors experiencing financial abuse. Many of the victim-survivors we work with report being coerced by perpetrators to ensure Centrelink payments go into the perpetrator's account. To ensure that this does not occur with PPL, we recommend both that consent should be verbally obtained from the birth parent, and that the Government implement specialised training on family and domestic violence for the staff that are responsible for seeking this consent from the birth parent. It is critical that frontline staff can effectively identify instances of family and domestic violence and be able to respond with meaningful support options.

Recommendation

3. The Commonwealth Government implement family and domestic violence training for frontline staff responsible for obtaining verbal permission from the birth parent before the non-birth parent becomes the primary PLP claimant.

⁴⁰ Lanfranconi, L. M., & Valarino, I. (2014). Gender equality and parental leave policies in Switzerland: A discursive and feminist perspective. *Critical Social Policy*, 34(4), 538-560. Walsh, E. (n.d.). *Fathers and parental leave*. Australian Institute of Family Studies. <https://aifs.gov.au/aifs-conference/fathers-andparental-leave>.



Flexible Paid Parental Leave Days

The Salvation Army welcomes the Commonwealth Government's commitment to enhancing the flexibility of the PPL scheme.

We commend the amendments that allow for parents – whether birth or non-birth – to access PPL in blocks as short as a day for the first two years of a child's life. Further, we commend the ability for parents to be able to access two weeks of concurrent leave. There are many circumstances in which concurrent leave may be used by parents, including when they have multiple children, or when a parent has their own physical or mental health needs.⁴⁴

We believe that this amendment will encourage parents to share caring roles according to family needs and preferences and encourage non-birth parents to take on more of a caring role, therefore challenging the stigma around PPL for non-birth parents and improving workforce outcomes for women.

A Family Income Limit and Expanded Eligibility

The Salvation Army welcomes the introduction of a family income test for those who fail the individual income assessment, including single-parent families.

A family income test considers the household's income and removes the current scheme inequities where men are assumed breadwinners.⁴⁵ We note that the current individual income limit of \$156,647 can be limiting in some circumstances and have a particularly significant impact on sole-parent and sole-income families. For example, if a birth parent earns above this amount, though the non-birth parent has no income, they are currently ineligible for PPL. We further commend that the income test will be applied to claimants individually, not excluding one parent from accessing PLP based on the non-birth parent's income.

We believe that the introduction of the family income assessment not only challenges caring stereotypes evident within the current PPL scheme, but will ensure greater access, and therefore financial security and support for families with a newborn or newly adopted child.

The Salvation Army additionally commends the Bill's amendment to allow for non-birth parents to receive the PLP regardless of whether the birth parent meets the income and residency requirements.

⁴¹ Workplace Gender Equality Agency. (2019, September 3). *Designing and supporting gender equitable parental leave (Insight Paper)*. https://www.wgea.gov.au/sites/default/files/documents/Insight_paper_designing_and_supporting_gender_equitable_parental_leave.pdf.

⁴² Raub, A., Nandi, A., Earle, A., de Guzman Chomy, N., Wong, E., Chung, P., Batra, P., Schickedanz, A., Bose, B., Jou, J., Franken, D., & Heymann, J. (2018). *Paid Parental Leave: A detailed look at approaches across OECD countries*. WORLD Policy Analysis Center.

⁴³ Workplace Gender Equality Agency. (2019, September 3). *Designing and supporting gender equitable parental leave (Insight Paper)*. https://www.wgea.gov.au/sites/default/files/documents/Insight_paper_designing_and_supporting_gender_equitable_parental_leave.pdf.

⁴⁴ Wood, D., Emslie, O., and Griffiths, K. (2021, September). *Dad days: how more gender-equal parental leave would improve the lives of Australian families*. Grattan Institute. <https://grattan.edu.au/report/dad-days/>.

⁴⁵ Ibid.





Further Considerations

Commencement of Amended Paid Parental Leave

The Salvation Army holds concerns in relation to the commencement of the PPL amendments. As discussed in the Bill, the eligibility of parents for amended PPL under the 'new law' is dependent on whether a child is born prior to, or on and after 1 July 2023.

We believe that relying on the expected date of birth of the child could act as an increased stressor for families expecting a child on or around 1 July 2023, and that the suggested commencement and transition period does not adequately consider nor reflect the needs and potential stressors for these families. For example, if a child is due on or after 1 July, though is born prematurely prior to this date, the Bill stipulates that this family will not be eligible for the new amendments. This means that the family of a premature baby could be further required to re-negotiate work arrangements and caring roles as they would be considered under the 'old law' and not entitled to the PPL amendments during an extremely stressful time involving additional emotional, physical and financial stressors that come with having a premature baby.

We urge for further consideration to be given to the commencement and transition period of the final amendments, and suggest that as opposed to birth date, that eligibility for 'new law' entitlements be according to when applicants elect to commence PPL. For example, if a family elects to start receiving commences PPL prior to 1 July, then they would be under the 'old law'. However, if their PPL entitlements were to commence after 1 July, they would be under entitled to the new PPL provisions. This would allow for more security for families in planning their work and care arrangements and prevent additional stressors in relation to PPL.

Recommendation

4. The Commonwealth Government implement the 'new law' reflecting PPL amendments according to a family's chosen PPL commencement date.

About The Salvation Army

The Salvation Army is an international Christian movement with a presence in more than 130 countries. Operating in Australia since 1880, The Salvation Army is one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion.

The Salvation Army Australia provides more than 1,000 social programs and activities through networks of social support services, community centres and churches across the country.

Programs include:

- Financial counselling, financial literacy and microfinance
- Emergency relief and related services
- Homelessness services
- Youth services
- Family and domestic violence services
- Alcohol, drugs and other addictions
- Chaplaincy
- Emergency and disaster response
- Aged care
- Employment services

As a mission-driven organisation, The Salvation Army seeks to reduce social disadvantage and create a fair and harmonious society through holistic and person-centred approaches that reflect our mission to share the love of Jesus by:

- Caring for people
- Creating faith pathways
- Building healthy communities
- Working for justice

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

Further Information

The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance. Further information can be sought from Major Paul Hateley, National Head of Government Relations, at _____ or _____ on _____.

