

18 October 2011

Paid Parental Leave Branch – Dad and Partner Pay Consultation
c/- FaHCSIA
Canberra Mail Centre
Mail Box 7576
Canberra ACT 2610

Submitted via email: ppl@fahcsia.gov.au

Dear Paid Parental Leave Branch,

On behalf of the Queensland business community, the Chamber of Commerce and Industry Queensland (CCIQ) welcomes the opportunity to provide feedback on the Dad and Partner Pay proposal as part of the Australian Government's Paid Parental Leave (PPL) scheme. CCIQ continues to welcome the initiative of the Australian Government to deliver Australia's first taxpayer-funded Paid Parental Leave Scheme and subsequently extends this support to similar benefits for Dads and Partners.

In relation to the current proposal, CCIQ provides support for:

- Providing two weeks Dad and Partner Pay at the National Minimum Wage;
- Making payments available to eligible working fathers and partners who share the role of caring for a born or adopted child;
- Starting the 2 week payments from 1 January 2013 to provide sufficient transition for employers;
- Having consistent eligibility requirements to the current Paid Parental Leave Scheme;
- Payments being administered by the Family Assistance Office (FAO) and being required to be taken in one instalment;
- Dad and Partner Pay not being subject to superannuation provisions, workers compensation premium liabilities or the accrual of additional leave entitlements;
- Dad and Partner Pay should also be except from payroll tax.

CCIQ strongly supports consistency between entitlements under the Dad and Partner Pay, and Paid Parental Leave schemes. This includes allowing fathers and partners to access Dad and Partner Pay at the same time as any paid or unpaid parental leave or other employer funded leave entitlements (such as annual leave or long service leave), similar to employees who are eligible for payments under the Paid Parental Leave scheme.

CCIQ also continues to strongly support the FAO administering payments to eligible employees. Changing this requirement to require employers to administer Dad and Partner Pay to employees will only result in further imposts on businesses that are not necessary for a one-off, two week payment. Subsequently, to ensure consistency, CCIQ further supports changing the current requirements to require the FAO to administer payments under the Paid Parental Leave scheme.

Finally, the Chamber has some concerns around the requirements that will be placed on employers to provide sufficient evidence to demonstrate an employee's eligibility and work history. Employers are currently being required to fill out pages of forms to demonstrate an employee's eligibility for payments under the Paid Parental Leave scheme. CCIQ supports a significant reduction in the red tape and administrative requirements placed on employers surrounding the eligibility of their employees for government payments, including Paid Parental Leave and Dad and Partner Pay.

CCIQ looks forward to working with the Federal Government on expanding the Paid Parental Leave scheme and ensuring it is as simple as possible for employers to implement and comply with. If you have any questions regarding this correspondence please contact Senior Policy Analyst Leanne Connell on (07) 3842 2237 or email lconnell@cciq.com.au.

Yours Sincerely

A handwritten signature in blue ink, appearing to read 'Nick Behrens', with a stylized flourish at the end.

Nick Behrens
General Manager, Advocacy
Chamber of Commerce and Industry Queensland