



Queensland Alliance for Mental Health

Carer Leave Submission

March 2023

Who is QAMH?

The Queensland Alliance for Mental Health (QAMH) is the peak body for the Community Mental Health and Wellbeing Sector in Queensland. We represent more than 100 organisations and stakeholders involved in the delivery of community mental health and wellbeing services across the state. Our role is to reform, promote and drive community mental health and wellbeing service delivery for all Queenslanders, through our influence and collaboration with our members and strategic partners. At a national level, we have a formal collaboration with Community Mental Health Australia and provide input and advice to the work of Mental Health Australia and the National Mental Health Commission where appropriate. Locally, we work alongside our members, government, the Queensland Mental Health Commission and other stakeholders to add value to the sector and act as a strong advocate on issues that impact their operations in Queensland communities.

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Acknowledgement of Country

QAMH acknowledges the Traditional Custodians of the land on which we live, learn, and work and recognises their continuing connection to land, waters and community. We pay our respects to them and their cultures; and to Elders past, present and emerging.

Recognition of Lived Experience

QAMH recognises that the Community Mental Health and Wellbeing Sector exists because of people with Lived Experience of mental distress, their families, carers and support people. We acknowledge the expertise and the courage of people with Lived Experience, and we commit to work with and alongside people with Lived Experience in all we do.

Background

QAMH welcomes the opportunity to provide comment on the Productivity Commission's Position Paper on Carer Leave. Carers provide a vital service to the broader community, reducing the need for formal (paid) care. However, time spent caring significantly reduces the time available for carers to participate in employment and education, and too often they are faced with impossible choices. In the current context, where the demand for carers is escalating,¹ this Position Paper is a timely examination of the ways to incentivise informal care by exploring an extension of unpaid carer leave.

We acknowledge that the Productivity Commission has been asked to examine the economic and social costs and benefits of providing an extended unpaid leave entitlement to informal carers of older Australians in the National Employment Standards. QAMH however strongly endorse our previous position that the proposed changes to the National Employment Standards be broadened to include all carer types. As such, this submission is based on the premise that reforms to supports for carers of older people should be extended in their application to other carers too. As the peak body for the Community Mental Health and Wellbeing Sector in Queensland, QAMH's focus is on carers of people experiencing mental illness.

Informal carers provide substantial support to people with mental illness. The 2020 Productivity Commission's Mental Health Inquiry quantified the total informal support provided by family and friends to Australian adults with mental illness. It found that 971 000 people were caring for someone who had mental illness and for 414 000 of these carers, mental illness was the main condition of their care recipient.²

The 2021 ABS Census revealed that mental illness is now the most common of all chronic diseases, with 2.2 million Australians reporting mental illness as a long-term health condition, far outnumbering diabetes, heart disease, arthritis or asthma.³ It also accounts for 12.3% of the total disease burden in Australia.⁴ But as illuminated by the Productivity Commission's 2020 Mental Health Inquiry Report, there are gaps in available services for people with mental illness which result in them not always receiving timely support of the type and quantity needed. Consequently, the burden of care often falls upon informal carers such as a family member or friend. These carers are instrumental in providing a range of emotional and practical supports to people with mental illness and frequently make a crucial difference to their wellbeing and recovery journey. In their absence, the care needs of people with

¹ Deloitte Access Economics. (2020). *The Value of Informal Care in 2020*. [The value of informal care in 2020 \(carersaustralia.com.au\)](https://www.carersaustralia.com.au)

² Australia. Productivity Commission. (2020). *Mental Health Inquiry Report*, 3(95), p872.

³ Australia. Australian Bureau of Statistics. (2022). *2021 Census*. [2021 Queensland, Census All persons QuickStats | Australian Bureau of Statistics \(abs.gov.au\)](https://www.abs.gov.au)

⁴ Australia. Australian Institute of Health and Welfare. (2018). *Australian Burden of Disease Study: Impact and Causes of Illness and Death in Australia 2018*. [Australian Burden of Disease Study: Impact and causes of illness and death in Australia 2018, Summary - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au)

mental illness would either go unmet or would need to be picked up by the formal health and social care systems, at additional cost to government and society.

The economic value of informal mental health care in Australia is not small change: researchers at the University of Queensland's School of Public Health have found that carers provided 208 million hours of care annually - which would cost \$14.3 billion to replace with paid carers.⁵ This significant economic value, which would otherwise be forced upon the taxpayer, must be taken into account in any discussion about changes to the leave entitlement system for carers.

Comments on the Provisional Model

The key features of the provisional model for extended unpaid carer leave outlined by the Productivity Commission⁶ include:

- unpaid leave for 3–12 months (with the employee to specify the duration at the outset) with access to another period of leave 12 months after the last use
- a notice period of 4 weeks
- available to employees with at least 12 months of continuous service
- applied to businesses of all sizes and to regular casual workers
- evidence requirements in line with other National Employment Standards.

Broadly, QAMH supports the model, particularly the last 3 elements, and recognises the need to balance carer needs with viability for employers. However, we request that the Commission consider the following modifications to increase the suitability of the entitlement for the needs of mental health carers:

- Ensure that extended unpaid leave is available to carers on a recurrent basis and reduce the waiting period between each extended leave request to better accommodate episodic needs for mental health carers.
- Add an option to waive the 4 week notice period to accommodate emergencies and/or crisis situations for carers.

These suggestions are explored in further detail below.

⁵ Diminic, S., Hielscher, E., Lee, Y.Y., Harris, M.G., Schess, J., Kealton, J., & Whiteford, H.A. (2017). *The economic value of informal mental health caring in Australia*, p12.

⁶ Productivity Commission. (2023). A case for an extended unpaid carer leave entitlement? Position Paper. <https://www.pc.gov.au/inquiries/current/carers-leave/position/carers-leave-position.pdf> p36.

Amend Conditions on Recurrent Leave

QAMH encourages the Commission to consider the episodic nature of caring for someone with mental illness in any conditions attached to extended unpaid carer leave. While everyone's experience of mental illness is a unique journey, it is true that the course of mental illness tends to fluctuate in a way different to physical illness. People will move in and out of different stages at different times and this impacts on the intensity and frequency of care needed. The episodic nature of mental illness often means that carers may require multiple periods of leave.

We believe that an extended unpaid leave system needs to reflect this reality.

QAMH agree that 12 months of continuous service prior to accessing extended unpaid leave is reasonable to build employer-employee trust and employee loyalty and attachment to a workplace. However, having met this initial criterion, we feel that requiring workers who have previously accessed this leave entitlement to wait a further 12 months before applying for subsequent extended unpaid leave may be prohibitive and does not reflect the reality of caring for someone with a mental illness or indeed, caring responsibilities for older people more broadly. We ask that the Commission consider reducing the gap required between extended unpaid leave requests to make extended unpaid leave a more viable option for mental health carers who may otherwise have to make a tough decision on whether to take once-off extended unpaid leave in a 12-month period, "grin and bear it" while potentially risking their own health in the process or decide to resign permanently from their role.

Finally, QAMH would like to reinforce that access to extended unpaid leave should be available on a recurring basis indefinitely, rather than something a carer is only eligible for once (or twice as it appears currently) before it is exhausted. At present, this is not clear in the Commission's provisional model.

Include Notice Period Exemptions

QAMH supports maximum flexibility to leave entitlements for carers, especially mental health carers for whom caring commitments can escalate quickly and without warning. We acknowledge that an employer may need to know the duration of the leave in advance, in order to implement business continuity measures such as hiring replacement staff or preparing another staff member to step into the role. We therefore support the proposal to implement a four week notice period for **standard extended leave requests**.

There are situations however – especially for mental health carers - where providing four weeks notice will simply not be possible, and where carers may not have a sufficient balance of other leave to cover the notice period. We note that in crisis situations, the first four weeks is also likely to be the most critical for the person receiving support and most stressful for the person providing care. Arafmi Ltd

highlight⁷ that sudden onset of serious care needs is a reality for their mental health carers, and list the following circumstances of the person being cared for that warrant actioning an “emergency waiver” to the extended leave notice period:

- Imminent risk of suicide or serious self-harm.
- Imminent serious threat to life or health.
- Medical or psychiatric emergency or hospitalisation.
- Serious accident or injury.
- Imminent or immediate eviction or homelessness.
- Arrest and incarceration.
- Victim of serious crime e.g. rape, assault, threat of violence.

We believe that all these incidents may result in a serious psychosocial trauma or crisis that requires an immediate response from carers. Including an emergency waiver on these humanitarian grounds may be lifesaving for the person requiring care and critical to enabling a mental health carer to remain in work. In all situations, we encourage open communication between employee and employer with an understanding that circumstances can change quickly, especially for mental health carers.

It’s worth noting that carers are more likely to assess how situations develop than take immediate unplanned leave for an extended period of time. In these cases, flexible working arrangements in agreement with employers are likely to add an important solution to the mix during the notice period. However, QAMH believe that it’s still important to include waiving the notice period in extreme circumstances to make extended unpaid leave a useful option for mental health carers.

⁷ Arafmi Ltd. (2023). *Arafmi Submission on Carer Leave Position Paper*. Unpublished.

General Comments

Flexible Working Arrangements are Important

QAMH strongly supports the finding that “Working flexibly is highly valued by carers and is a key factor in enabling them to manage their work and caring commitments.” We look forward to changes under the Fair Work Act⁸ which we believe will make it easier for carers to negotiate working arrangements with their employers that will help them balance their work and care commitments and, while not replacing the need for extended leave provisions under the National Employment Standards, may reduce the need for carers to utilise this option. We support the notion that many Australians are carers at some time in their lives and that work flexibility is something that most employees will value, rather than applying to just a few, and that workplace flexibility is good for productivity as well as wellbeing.⁹ What remains to be seen however is how easily mental health carers will be able to access this option under the new Act.

Part-time Option for Extended Leave

Given that flexible working arrangements are likely to best suit both employees and employers, QAMH recommends that the Commission consider including an entitlement to take extended carer leave as a reduction in working hours, as an alternative to an absence from work. There are significant potential benefits to this approach, including enabling more carers to maintain a basic level of income and connection to the workplace while also managing other stressors, retaining workforce skills and experience and enabling less experienced staff to upskill and learn a new role in a supported way, that ultimately builds the skills base of the organisation. We believe that this change could entail significant benefits for employers as well as carers.

Thank you for the opportunity to comment on this Position Paper. We look forward to reviewing the recommendations put forward by the Productivity Commission. Please do not hesitate to contact QAMH should you require any further information.

⁸ As of 6 June 2023, employees eligible to make a request for a flexible work arrangement expands to include employees who are: pregnant, caring for family members over 55 or are experience domestic violence. Further, employers need to undertake a more rigorous process before being able to refuse a flexible work arrangement, including considering the consequences of refusal on the employee and proposing other changes, in writing, that the employer is willing to make to accommodate the employee. Fair Work Commission. (2023). *Secure Jobs Better Pay Act – What’s Changing* <https://www.fwc.gov.au/about-us/secure-jobs-better-pay-act-whats-changing>

⁹ Arafmi Ltd. (2023). *Arafmi Submission on Carer Leave Position Paper*. Unpublished.