

12 October 2018

Our ref: KB-ILC

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By post and by email: [sacsplsl@oir.qld.gov.au](mailto:sacsplsl@oir.qld.gov.au)

Dear Mr James

**Investigation of the introduction of a portable long service leave scheme for the social and community services sector in Queensland - Consultation Regulatory Impact Statement**

Thank you for the opportunity to provide comments on the Investigation of the introduction of a portable long service leave scheme for the social and community services sector in Queensland Consultation Regulatory Impact Statement (RIS).

We note that the RIS outlines a rationale for investigating the introduction of portable long service leave (PLSL) for employees in the social and community services sector and presents three options to implement this.

Whilst the Queensland Law Society (QLS) does not proffer a view on whether PLSL should be extended to this sector, we note that the sector covers a large number of workers, many of whom are employed by government funded programs. Appropriate funding should be made available to ensure that employers are not worse off as a result of the introduction of a portable long service leave scheme in this sector.

If this policy change is to take effect, we consider that there should be an appropriate transitional period and information provided to employers to allow them to make necessary arrangements.

As to the preferred option for implementing this scheme, we consider that utilising the existing authority to administer the scheme would be more cost effective/efficient than creating a new body.

We would be pleased to review any draft legislation implementing this reform.

We also consider that there is a broader policy question that should be addressed by Government. That is, that there are a number of inconsistencies between long service leave entitlements applying to different employees across Queensland including those falling under schemes such as the one proposed, public services employees and employees employed by private business.

## Consultation Regulatory Impact Statement

It is our view that it would be preferable not to have several, conflicting schemes nor to reform the laws relating to these entitlements in an ad hoc way.

The QLS would be pleased to engage further with you on this issue so as to ensure that reforms to this area are appropriate and effective.

If you have any queries regarding the contents of this letter, please do not hesitate to contact our Senior Policy Solicitor, Kate Brodnik by phone on (07) 3842 5851 or by email to [K.Brodnik@qls.com.au](mailto:K.Brodnik@qls.com.au).

Yours faithfully

A handwritten signature in black ink, appearing to read 'Ken Taylor', with a long horizontal flourish extending to the right.

Ken Taylor  
**President**