

Five-year review of the Community Services Industry (Portable Long Service Leave) Act 2020

**PeakCare's Submission to the Office of
Industrial Relations**

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Introduction

PeakCare welcomes the opportunity to provide feedback to the Queensland Government's five-year review of the *Community Services Industry (Portable Long Service Leave) Act 2020*. PeakCare represents a broad cross section of non-government child, youth and family services, many of whom employ staff covered by the Portable Long Service Leave (PLSL) scheme administered by QLeave.

The introduction of portable long service leave for the community services industry has been an important reform that recognises the mobility and complexity of employment across the sector. The review is an opportunity to strengthen the operation of the scheme, improve clarity for employers and workers and ensure the scheme continues to deliver its intended benefits into the future.

About PeakCare

PeakCare is a not-for-profit peak body for child and family services in Queensland, providing an independent voice representing and promoting matters of interest to the non-government sector. Across Queensland, PeakCare represents small, medium, and large local, state-wide and national non-government organisations which provide prevention and early intervention, generic, targeted, and intensive family support to children, young people, families, and communities. Member organisations also provide child protection services, foster care, kinship care and residential care for children and young people who are at risk of entry to, or who are in the statutory child protection system and youth justice systems.

A large network of associate members and supporters also subscribe to PeakCare. This includes individuals with an interest in child protection, youth justice and related services, and who are supportive of PeakCare's policy platform around the rights and entitlements of children, young people and their families to safety, wellbeing, and equitable access to life opportunities.

PeakCare's Submission

PeakCare strongly supports the intent and value of the PLSL scheme. The scheme provides a vital benefit to workers in a sector where employment is often dependent on short term funding which can be easily impacted by service system and employer changes beyond a worker's control. The scheme adequately addresses the sector's high rates of involuntary mobility and the necessity of a portable model to ensure access to long service leave entitlements, whilst supporting workforce wellbeing and retention.

There remains, however, gaps in clear and accessible information available to employers, workers, accountants and bookkeepers. Practical guidance is limited regarding how entitlements apply to workers not covered by or paid above award rates. Uncertainty also persists about whether organisations should plan for or carry future long service leave liabilities for above award or non-award workers and online resources currently provide insufficient detail for organisations and external payroll providers. Workers may also struggle to understand the rate at which they will be paid and accumulate long service leave beyond the initial 7 year period, underscoring the need for more transparent and readily available information.

Employers also have challenges understanding the *Community Services Industry (Portable Long Service Leave) Act 2020* and how it interfaces with the long service leave obligations of the *Industrial Relations Act 2016*.

Transparency regarding fund management is another important consideration. There is limited visibility of how funds are invested and distributed, how actuarial assumptions inform levy adjustments and why unclaimed contributions are retained when a worker exits the sector. While detailed actuarial reviews and financial reports exist, they can be complex and difficult for individuals and small organisations to interpret. Accessible summaries that explain how the scheme is funded, managed and safeguarded would strengthen sector confidence.

Administrative requirements also place notable pressure on organisations. Quarterly reporting and payment deadlines, short submission windows and misalignment with other business reporting cycles can create unnecessary administrative burden, particularly for small service providers. The timing of PLSL reporting does not always align with the ATO's Individual Activity Statement schedule, resulting in duplicated effort. Extending the reporting window or recalibrating due dates would reduce administrative effort without compromising the integrity or sustainability of the scheme.

Conclusion

The PLSL scheme remains an important and beneficial mechanism for supporting a stable, sustainable and valued community services workforce in Queensland. Strengthening clarity, transparency and administrative accessibility will ensure the scheme continues to operate effectively and equitably. To support this, PeakCare recommends that in preparation for eligible claims, workers and employers are provided with a reasonable amount of time to understand the financial impact of the scheme so they can clearly determine the rate at which long service leave will be paid, including for above award and non-award classifications. Providing this clarity in advance will promote confidence, consistency and fairness across the sector and will ensure that the scheme continues to fulfil its intended purpose.

Yours sincerely,



Tom Allsop

Chief Executive Officer