

EzyData Bookkeeping Services

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Submission Letter

To: Department of Employment and Workplace Relations

Subject: Submission on the Secure Australian Jobs Code Consultation

Introduction

My name is s 47F(1) founder of **EzyData Bookkeeping**, a sole trader business providing administrative bookkeeping support for small businesses and sole traders. My services focus on accurate data entry, payroll, accounts management, and monthly reporting using digital platforms such as Xero, and Excel. I operate with strict compliance boundaries, preparing records for lodgments but not offering tax or BAS agent services.

I welcome the opportunity to contribute to the consultation on the Secure Australian Jobs Code.

Support for Secure Work Principles

I strongly support the Code's intent to promote secure and fair employment. Stable work arrangements benefit both employees and businesses by building trust and reducing turnover. At the same time, small businesses often rely on casual or part-time staff to manage fluctuating workloads. The Code should balance **security for workers** with **flexibility for small business operations**, ensuring that compliance is achievable without undue burden.

Transparency & Compliance

Accurate reporting is essential to secure work. Digital bookkeeping platforms already provide tools to ensure wages, GST, superannuation, and entitlements are recorded correctly. As a bookkeeper, I see firsthand how technology improves transparency and reduces errors.

I recommend that the Code:

- Provide **clear compliance pathways** tailored to sole traders and micro-businesses.
- Encourage **digital adoption** through training and grants, helping small businesses meet reporting obligations efficiently.
- Recognize the role of bookkeepers in preparing compliance-ready records that registered tax/BAS agents can then lodge.

Privacy & Data Handling

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I support the strong privacy protections outlined under the **Privacy Act 1988** and **Archives Act 1983**. Small businesses increasingly rely on cloud-based platforms, and secure handling of employee data is critical.

I recommend that the Code includes:

- Practical guidance for micro-businesses on managing employee data securely.
- Resources or training to help sole traders comply with privacy obligations when using digital systems.

Recommendations

- Provide **training and grants** to support secure work practices and digitalization for small businesses.
- Recognize the contribution of bookkeepers in compliance preparation, while maintaining clear boundaries with tax/BAS agents.
- Ensure the Code is **accessible and practical** for sole traders, avoiding excessive administrative requirements.
- Encourage collaboration between government, tax agents, and bookkeepers to streamline compliance processes.

Conclusion

The Secure Australian Jobs Code represents an important step toward strengthening workplace protections. I support its objectives and encourage the Department to consider the unique needs of sole traders and small businesses.

EzyData Bookkeeping is committed to compliance, transparency, and supporting small businesses in meeting their obligations. I would welcome the opportunity to provide further input or case studies from the perspective of micro-businesses.

Sincerely,

s 47F(1)

s 47F(1)

Founder/Data Entry Bookkeeper/Assistant Accountant

EzyData Bookkeeping

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WorkSafe Tasmania

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Industry Policy
Department of Employment and Workplace Relations

By email: SecureJobsCode@dewr.gov.au

Feedback on the development of the Secure Australian Jobs Code

Dear Industry Policy,

Thank you for invitation to provide feedback on the development of the Secure Australian Jobs Code (the Code) currently being undertaken by the Department of Employment and Workplace Relations.

We have reviewed the provided Consultation Paper and consider that the matters raised fall within the Department of Treasury and Finance. We have consulted Treasury who have asked us to pass on the following observation:

> 'The Consultation Paper suggests that the Secure Jobs Code could be applied to indirectly funded work, including funding provided to state governments. While the Consultation Paper is unclear on the scope of funding to which the Code would apply, Treasury has concerns that requiring the Secure Jobs Code to apply to Australian Government funding to states could add additional administrative burden and reporting complexity to Commonwealth-State funding agreements. Treasury seeks to minimise administrative burned and complexity associated with Commonwealth-state funding agreements'

Treasury have also requested to be kept abreast of developments concerning the Code. To this end, we respectfully ask that s 47F(1) (s 47F(1) @treasury.tas.gov.au), be added to relevant mailing lists concerning the Code.

Yours sincerely
s 47F(1)

Liz Radcliff
Executive Director, WorkSafe Tasmania

03 February 2026

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Document 3 (pages 4-10) removed under section 45(1) of the *Freedom of Information Act 1982*.

These pages contain material obtained in confidence and are exempt from access.

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UNIONSWA
FAIRNESS. SAFETY. DIGNITY.

20 February 2026

Department of Employment and Workplace Relations
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Secure Australian Jobs Code Consultation Paper

UnionsWA is the peak body of the trade union movement in Western Australia. We strengthen WA unions through co-operation and co-ordination on campaigning and common industrial matters. UnionsWA represents 29 unions, who in turn represent approximately 140,000 Western Australian workers.

UnionsWA welcomes the opportunity to provide a submission to the Department of Employment and Workplace Relations in response to the *Secure Australian Jobs Code Consultation Paper*. UnionsWA strongly endorses and supports the submission and recommendations made to this consultation by the Australian Council of Trade Unions (ACTU). These are critical and practical recommendations.

The Commonwealth Government is a major funder and procurer of capital works, goods and services across the nation, including Western Australia. As such it wields significant economic power across a vast range of different sectors and industries. Public investment should ensure public value by building secure and high-quality employment, delivering better outcomes for local communities, and strengthening the long-term sustainability and diversity of the domestic economy.

It is integral that the Commonwealth Government seeks to maximise benefits for workers and local communities by using procurement to support local jobs and drive economic, environmental and social outcomes. Further, ensuring quality, safe workplaces through the highest possible standards of workplace health and safety, increasing training and apprentices and best practices industrial relations, supports the effective delivery of projects and services.

Through the Secure Australian Jobs Code, the economic power of the Commonwealth should be used to ensure the fair treatment of workers and uphold their workplace rights and safety. While ensuring that at a minimum, legal obligations are being met, the Code's requirements need to extend further to drive greater job security and reduce the incidence of insecure work, and promote workforce diversity and inclusive workplaces. The Code should be utilised to promote strong ethical and labour standards across government procurement and funding arrangements. This is essential to ensuring that the expenditure of public money delivers genuine public benefits.

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Requirements of the Secure Jobs Code

UnionsWA supports the eleven Secure Australian Jobs Code requirements that the ACTU has set out, covering:

- secure jobs
- workplace health and safety
- well-paid jobs with good conditions
- local employment
- workplace representation
- gender equality
- skills
- workforce inclusion
- ethical supply chains
- local supply chains
- compliance with the law

These requirements and the details set out under each for how those are to be met, are essential to achieving the stated purpose of the Secure Australian Jobs Code to prioritise secure work in government contracts and ensure government purchasing power is being used to support businesses that engage in lawful, fair, equitable, ethical and sustainable practices. In the discussion below, we highlight just some of the important recommendations by the ACTU for those requirements in particular areas.

Secure jobs

It is essential that the Secure Australian Jobs Code drives concrete action on job security. Workers in insecure employment arrangements face financial insecurity, difficulty planning and saving for the future, and stress. Job insecurity has been linked to worse mental and physical health outcomes, lower self-esteem, and worse family relations.[1] In addition, insecure work undermines the longer-term productivity of workplaces through reduced training and skill development, lower levels of employee commitment, higher labour turnover and lower occupational health and safety standards.[2] In turn, this inevitably increases costs for government, either directly as the procurer or through the provision of public services.

The 2019 *Inquiry into wage theft in WA* received evidence regarding the link between systemic and illegal underpayment of wages, and insecure employment. The WA Branch of the Australian Manufacturing Workers' Union submitted that those in precarious work and migrant workers, were 'particularly vulnerable to wage theft'. The United Workers Union pointed out that its members work in industries that are characterised by insecure and low paid work, and that

[1] Maria Leonor Pires, The Effects of Job Insecurity on Psychological Well-Being and Work Engagement' (2025) 15(7) *Behavioural Science* 979.
[2] ACTU, *Insecure Work, Anxious Lives* (Report, 2011) 13.

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> Exploitation is … particularly evident where workers feel powerless to do anything to remedy the situation due to fear of losing their jobs, hours or residential status. [3]

UnionsWA strongly supports the recommendations by the ACTU that the Secure Australian Jobs Code should establish as a requirement that workers are engaged directly and on a permanent and secure basis wherever possible. Where entities do engage workers on casual, fixed-term and/or labour hire arrangements, this must only be as a last resort to meet extraordinary and short-term operational requirements. Safeguards are needed in such circumstances, including that these arrangements do not breach an annually updated sector benchmark of staff being employed on a secure and direct basis. Further, the proponent must offer any worker engaged on a temporary basis a permanent job after no more than six months.

Well-paid jobs with good conditions

UnionsWA strongly supports the recommendation by the ACTU that a requirement under the Secure Australian Jobs Code should be that entities receiving support have a current registered collective agreement that includes an employee organisation as a party.

Collective bargaining is the most effective means to secure better pay and conditions for workers. The Australian Government's 2023 Employment White Paper *Working Future* recognised that:

> Bargaining at the workplace level can provide higher wages and conditions, and more productive workplaces. By allowing workers to seek wages and conditions above the safety net and facilitating agreements that enhance work and management practices, bargaining can support more productive businesses.[4]

Further, the recent Department of Workplace Relations *Trends in Federal Enterprise Bargaining Report* demonstrated that workers covered by union negotiated collective agreements get higher wage increases than those on agreements without union involvement. Union negotiated collective agreements delivered average annual wage increases of 3.9 per cent, compared to wage increases of 3.1 per cent under agreements where no unions were involved.[5] This demonstrates why the requirement cannot only be for a collective agreement to be in place in order to meet the principle of promoting safe and secure jobs that are well paid and have good conditions, but that these need to be union-backed agreements.

Analysis by the International Labour Organization indicates that higher wages may boost worker motivation, reduce turnover, and encourage skill development, resulting in higher levels of productivity. In addition, they attract more skilled or motivated workers, and increase job satisfaction, which also increases productivity. [6]

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[3] Tony Beech, *Report of the Inquiry into Wage Theft in Western Australia*, WA Government (Report, 2019) 62-65.
[4] Commonwealth of Australia, *Working Future: The Australian Government's White Paper on Jobs and Opportunities* (Report, September 2023).
[5] Department of Employment and Workplace Relations, *Trends in Federal Enterprise Bargaining – September quarter 2025* (Report, December 2025).
[6] International Labour Organization, *Economic factors for wage setting* (Report, 2025) 23-26.

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Workplace Health and Safety

UnionsWA also notes and supports the comments and recommendations by the ACTU that entities must have no major recent breaches of work health and safety laws, and a record of responding positively to workplace incidents. Entities should have to demonstrate that they have not been the subject of any adverse rulings, enforceable undertakings, non-compliance with an industrial instrument or administrative sanctions for non-compliance over the past five years or that it has been the subject of current Court proceedings for the same.

As part of this, the entities should also demonstrate their adherence to the duties set out for a person conducting a business or undertaking under the Safe Work Australia *WHS consultation, cooperation, and coordination* and guidance on *Worker Representation and Participation*. This includes their consultation with workers throughout work health and safety risk management processes, and the presence of mechanisms such as Health and Safety Committees.

At least 50 per cent of the members of their Health and Safety Committee must be selected by the workforce. Healthy and safe work is a fundamental human right and essential to decent work. Having a voice at work and on how work is conducted is essential to health and safety. Workers have a fundamental role in identifying risks, shaping solutions and ensuring that what is needed to make a workplace safe is implemented.

Local employment

UnionsWA highlights the recommendation by the ACTU that it should be a requirement that entities provide evidence of genuine, ongoing, and proactive promotion of job opportunities to local community members. This includes that they do not engage in 100 per cent fly-in fly-out (FIFO) employment policies where there is a regional community of greater than 200 people within 125km of the project receiving support.

Western Australia is very familiar with the particular challenges and harms that FIFO/DIDO practices can have on workers. The FIFO environment has been described more as a 'total institution' than other workplaces, due to its all-encompassing nature.[7]

It means that workers experience feelings of disorientation, monotony, and entrapment.[8] Research on the impacts of FIFO work in WA found that the FIFO workforce experiences higher levels of psychological distress and is vulnerable to suicide.[9] The landmark 2022 *Enough is Enough* report detailed how pervasive the sexual harassment and assault of women is in the FIFO mining industry in WA.[10]

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[7] Community Development and Justice Standing Committee, *Enough is Enough: Sexual harassment against women in the FIFO mining industry* (Report, 2022) 37.
[8] Sara Dorow and Sandrine Jean, 'Managing liminal time in the fly-in fly-out work camp' 75(4) *Human Relations* 681.
[9] Sharon Parker et al, *Impact of FIFO work arrangements on the mental health and wellbeing of FIFO workers*, Centre for Transformative Work Design (Report, 2018).
[10] *Enough is Enough* (n 5).

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As such, UnionsWA considers it to be entirely appropriate that Secure Australian Jobs Code should disincentivise proponents' structuring projects around a 100 per cent FIFO and DIDO workforce as a default approach where that is avoidable. Where it is not avoidable, it is integral that the PCBUs are taking the necessary steps to meet their work health and safety duties by addressing the impacts of FIFO work patterns.

In such circumstances too, it should be a requirement that these FIFO or DIDO work arrangements are regulated through an enterprise agreement. This is essential so that not only are minimum standards set in areas such as accommodation, travel arrangements, and proper rest and recreation, but that they are also enforceable.

Workplace representation

One of the recent changes to the *Fair Work Act* has been to create positive rights and protections for workplace delegates. A workplace delegate is defined in s350C of the Act as 'a person appointed or elected, in accordance with the rules of an employee organisation, to be a delegate or representative (however described) for members of the organisation who work in a particular enterprise.' Delegates' rights include representing the industrial interests (including in any dispute) of members in their enterprise; representing the industrial interests of potential members; reasonable communication with members and potential members in relation to their industrial interests; reasonable access to the workplace and workplace facilities; and reasonable access to paid time during normal working hours, for the purpose of delegate related training.[11]

As part of meeting the requirements under the Secure Australian Jobs Code, workplace delegates should be enabled to communicate directly with new employees about the benefits of union membership and representation. This should include allowing workplace delegates to address inductions for new staff and to contact them via work-related contact details provided by the employer. This is essential so that workers know, at the commencement of their employment, about their rights to join their union and how to do so. Fundamentally, it is part of an entity understanding and respecting their employees' rights, including in relation to freedom of association and the right to representation at work. This is a critical component, therefore, of ensuring strong ethical and labour standards across workplaces.

Gender equality and skills

Gender inequality in work and gender segregated industries present a significant issue for Western Australia. Australian Bureau of Statistics data reveals that as of May 2025, the gender pay gap in WA sits at 19.6 per cent.[12] The Workplace Gender Equality Agency's employer census data also finds that the gender pay gap in Western Australia continues to be substantially higher than every other state and territory, sitting at 28.8 per cent as of November 2025.[13] Notably too, the same report finds that WA and the NT are the only states and territories where men outnumber women in the workforce.

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[11] *Fair Work Act 2009* (Cth) s 350C.
[12] Australian Bureau of Statistics, *Average Weekly Earnings, Australia* (February 2025).
[13] Workplace Gender Equality Agency, *WGEA Equality Scorecard 2024-25* (Report, November 2025).

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The comparatively high employment share of well-paid men-dominated industries in the Western Australian economy is a significant contributor to this statistic. Government has a critical role in addressing the size of WA's gender pay gap due to the choices it affirmatively makes regarding the provision of well-paid and secure roles, including through its funding and procurement decisions.

As such, we note the importance of the recommendations by the ACTU that project proponents, including project partners, must confirm they are not on the most recent published named as noncompliant list by the Workplace Gender Equality Agency. Further, UnionsWA notes the critical recommendations to meet targets for women apprentices and trainees, and women-in-trade apprentices and trainees, as well as employment targets for underrepresented groups.

Application of the Secure Jobs Code

UnionsWA highlights the important recommendation by the ACTU that the financial threshold for the application of the Secure Jobs Code be set at $200,000. It should apply across all forms of Commonwealth grants, investments, and procurement. As the ACTU notes, this strikes the right balance between ensuring administrative efficiency and the broad application of the Code to lift standards.

It is critical too that that the Secure Jobs Code applies to contractors and subcontractors. Both the proposed financial threshold and the application to contractors and subcontractors are consistent with the Australian Capital Territory's Secure Local Jobs Code. In the ACT, a 'Code Certified Entity' must ensure that any subcontractors engaged in connection with territory funded work have a valid secure local jobs code certificate and comply with the Code in relation to that work. The Code Certified Entity must also provide details of the proposed subcontractor to the Territory.[14]

The inclusion of contractors and subcontractors is essential for the policy intent of the Secure Jobs Code to succeed. There is a significant risk otherwise that entities utilise business models and contracting arrangements that enable them to avoid their obligations under the Code. Further, it can perpetuate a situation where workers on the same site or workplace are subject to vastly different conditions.

Implementation

Finally, UnionsWA notes the critically important recommendation by the ACTU that a Secure Jobs and Community Benefits Authority be established that works closely with the broader procurement team in the Department of Finance to oversee monitoring and compliance for the Australian Jobs Code and the Future Made in Australia Community Benefit Principles. This body would be responsible for assessing and issuing Secure Jobs Certificates, which entities would require in order to be eligible to tender for government projects or funding at or above the financial threshold. The success of a Secure Australian Jobs Code necessitates the establishment of a body that is responsible for the administration of the Code, as well as

[14] *Government Procurement (Secure Local Jobs Code) 2019* (ACT) s 8.

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monitoring ongoing compliance, investigating complaints and apparent non-conformance, and supporting all stakeholders, government and entities to effectively implement the Code.

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If you wish to discuss any matters raised in this submission further, please contact me at (08) 6313 6000 or s 47F(1) @unionswa.com.au.

Yours sincerely,

s 47F(1)

Rikki Hendon
Secretary

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