



Submission

On the Employment Leave Bill
2026

About PPTA Te Wehengarua

[1] PPTA Te Wehengarua represents the majority of teachers engaged in secondary education in New Zealand including secondary teachers, secondary principals, manual and technology teachers and area school teachers and area school principals.

[2] Under our constitution, all PPTA Te Wehengarua activity is guided by the following objectives:

- to advance the cause of education generally and of all phases of secondary and technical education in particular;
- to uphold and maintain the just claims of its members individually and collectively; and
- to affirm and advance Te Tiriti O Waitangi.

Our submissions reflect these objectives. We also wish to express our support for the NZCTU submissions on the Employment Leave Bill.

Part 1: The Employment Leave Bill 2026 as a whole

[3] The Employment Leave Bill 2026 (“**the Bill**”) is an ambitious and complex piece of legislation that, upon enactment, will have wide-ranging implications for workers in this country. Our detailed submissions in Part 2 will explain that there are a few, isolated parts of the Bill that PPTA Te Wehengarua supports. However, there are also many parts of the Bill that we object to and that have influenced our primary recommendation that the Bill should not be progressed at this time.

[4] Our overriding sentiment when analysing the Bill is that the Bill has been developed and drafted too quickly and that its provisions are overly concerned with -

- a. creating quick fixes to complex problems with the existing Holidays Act set-up; and
- b. creating solutions that will benefit payroll providers - rather than being focused on creating fit-for-purpose and enduring solutions that work for employees and employers alike.

[5] It is the view of PPTA Te Wehengarua that changes to the Holidays Act should only be made after careful consideration and following a thorough process of targeted consultation with unions and employer-representative organisations - to ensure any solutions are broadly supported, practically workable and enduring. The Holidays Act Taskforce was established as the result of this joint desire by unions and employers to achieve workable solutions to well-known Holidays Act issues together. Unfortunately, it is very apparent that the Bill’s provisions have not grown organically out of the Taskforce’s recommendations. Indeed, many critical features of the Bill, like the hours-based leave accrual system, were expressly rejected¹ by the Taskforce because -

¹ Holidays Act Taskforce *Holidays Act Taskforce Final Report* (Wellington, 2019) at [93].

- a. the Taskforce had established through testing that such a system would leave some people worse off, and
- b. the system did not have the necessary support of some stakeholders.

[6] It is disappointing that these findings of the Taskforce have been ignored. Instead, a largely new system has been developed in some haste and then rushed out to the public for a brief consultation period. This is regrettable given the scale and ambition of the changes that are proposed.

Recommendation 1 (primary recommendation)

- [7] PPTA Te Wehengarua recommends that the government pauses progressing the Bill and seeks engagement with the New Zealand Council of Trade Unions (“**NZCTU**”) to ensure that workable, purposeful and enduring solutions to Holidays Act issues can be developed. Successful employment law reform requires the involvement of critical stakeholders from both the employer and the employee side in the development of new legislation.
- [8] The following submissions on key elements of the Bill are subject to our primary recommendation that the Bill does not progress any further at this stage to enable engagement with the NZCTU to occur.

Part 2: Submissions on key elements of the Bill

The state school sector carve-out

- [9] Clause 4(1)(b) of the Bill temporarily delays the applicability of the Employment Leave Act 2026 for employees of school boards who are paid by a payroll service established under section 578 of the Education and Training Act 2020. Clause 1 of Schedule 1 instead provides for the Holidays Act 2003 to continue to apply to affected state school employees instead.
- [10] PPTA Te Wehengarua agrees that it is pragmatically sensible to create a carve-out for state school employees. We do not expect that the current payroll system could cope with implementing the required changes in two years’ time.
- [11] We are, however, concerned about the breadth of powers that the Bill proposes to give to the government of the day to create Orders in Council and set commencement dates for state school employees. We note that the current government did not think it necessary to consult with either the education sector unions (on behalf of the affected employees) nor with the New Zealand School Boards Association/Te Whakarōpūtanga Kaitiaki Kura o Aotearoa (on behalf of the employers) before putting forward a legislation proposal that contains state school-specific provisions. This apparent lack of interest in exploring how proposed sector-specific provisions will affect employers and

employees at the grassroots level does not instil great confidence that it is sensible for the government to be able to unilaterally dictate commencement dates - only to then leave it up to schools around the motu to have to deal with the consequences.

- [12] We further submit that the proposed statutory power to mandate different commencement dates for different school employees via an Order in Council far exceeds those that can reasonably be considered necessary to ensure that a new payroll system will be able to cope with the changes. There is no apparent, payroll-specific reason for the government to have the ability to dictate that different provisions of the Act will apply at different times (and for different purposes) nor is there a need for the government to have the ability to separate statutory parts and provisions that are usually linked and have them apply at different times. Either the school payroll system can cope with applying the new laws or it cannot. If the payroll system cannot cope with the new rules, the payroll system or the new rules are not fit for purpose and implementation should wait.
- [13] Giving the government of the day extensive, unilateral powers to dictate different implementation timelines comes with a significant risk that these powers will be weaponised against workers to keep compliance costs low. After all, the money school boards use to meet statutory minimum entitlements ultimately comes from the government (via teacher salaries, operations grant funding, remediation payments etc).
- [14] The powers that clause 4(2) of the Bill proposes to grant the government also create significant uncertainties that are related to the interaction between these provisions and the savings provision in clause 1 of Schedule 1 of the Bill - which temporarily preserves the applicability of the Holidays Act 2003. It is unclear what it means to say that the Holidays Act will keep applying to an employee “until a date or dates set by Order in Council” in those cases where the government has set different commencement dates for different statutory provisions of the Employment Leave Act (see clauses 4(2)(b) and 4(2)(c) of the Bill). If the Holidays Act is only applicable until the *first* of the new statutory provisions of the Employment Leave Act is applied to the employee pursuant to an Order in Council, this could leave school employees without some of the statutory protections that apply to virtually all other workforces. Such an outcome is entirely unacceptable to PPTA Te Wehengarua and it should certainly not be decided through an Order in Council.
- [15] Alternatively, if the Holidays Act continues to apply until the Employment Leave Act has been fully applied to the employee, this could result in some overlapping coverage between the new laws and the old laws and uncertainty about which rules are supposed to apply. This will inevitably result in conflicts at the school level - which is entirely unnecessary and undesirable.²

² We note that the current wording of the Bill does not expressly allow for a continued, partial application of the Holidays Act to deal with gaps caused by a piecemeal implementation of the Employment Leave Act (see clauses 4(2)(b) and (c) of the Bill).

- [16] There are a couple of other issues with the wording of the carve-out in clause 4(1)(b) of the Bill that we have identified:
- [17] Firstly, there are a number of state schools that do not pay all their staff via “a payroll service established under section 578 of the Education and Training Act 2020”³. According to information we have received from the Ministry of Education, ten state schools only pay their teachers via Education Payroll Ltd (“EPL”) and pay their non-teachers through a different payroll system. An employee who is not paid through EPL is not “paid by a payroll service established under section 578 of the Education and Training Act 2020” and will not be covered by the proposed carve-out. This will mean that it is foreseeable that some state school employees will have different statutory minimum entitlements - simply based on the choice of payroll provider that their specific school happens to use for this class of employee. This does not make sense to us from a public policy perspective - and it is bound to create unexpected and unusual consequences given how collective agreement entitlements and statutory minimum entitlements interact.
- [18] The obvious objection to this line of reasoning is that the only reason for the delayed implementation for the new Act in schools is that Education Payroll Ltd. cannot cope with the changes - whereas other school-specific payroll providers may be able to do so. However, this objection misses the larger point that the timing of when new legal rules should apply needs to be determined by looking at the employers and employees in the first instance - not just the payroll providers. Most board members that sit on school boards are parents. Although they will be supported by principals and staff representatives, expecting state school employers to be able to independently keep track of different kinds of minimum statutory leave entitlements and statutory processes for their teacher and non-teacher workforces in addition to keeping track of various contractual entitlements that apply is completely unrealistic.
- [19] The second issue with the wording of the carve-out is that the wording temporarily exempts certain state school employees from the application of the new Act - without simultaneously doing the same for the employing school board: Based on the current wording of clause 4 of the Bill, the boards of state schools remain subject to the default rule on applicability which states that “this Act applies to *all employers* and employees” (emphasis added).
- [20] We are unsure whether this distinction is intentional or whether the wording has been used accidentally. We tried to get answers from NZSBA Te Whakarōpūtanga Kaitiaki Kura o Aotearoa to this question, but, as previously noted, it appears that they were not consulted as part of the development of this wording either. In any case, we submit that separating employers’ and employees’ respective source of statutory rights and

³ Employment Leave Bill 2026 (259-1), cl 4(1)(b). See also: Employment Leave Bill, Schedule 1, cl1.

obligations is a mistake and opens the door for unnecessary arguments about the rights and obligations that apply in the employment relationship.

Recommendation 2

[21] We recommend that clause 4(2) of the Bill is deleted. The deletion of clauses 4(2)(b) and (c) are the most significant priorities for PPTA Te Wehengarua.

Recommendation 3

[22] PPTA Te Wehengarua further recommends that the carve-out in clause 4 of the Bill and the savings provision in clause 1 of Schedule 1 of the Bill are clarified to-

- a. ensure the carve-out provisions extend to all state school employees (irrespective of whether an employee is paid by a payroll service established pursuant to section 578 of the Education and Training Act 2020), and
- b. eliminate the possibility of commencement dates for state school employees being set through an Order in Council, and
- c. exempt the employing school board of state school employees from the Employment Leave Act until an employee at the school becomes covered by the new Act. The Holidays Act 2003 should continue to apply to the employer in the meantime much in the same way as it does for the employee. Should different kinds of employees of the board of a state school become covered by the Employment Leave Act 2026 at different times (notwithstanding recommendation 3b above), the Bill's provisions should be clarified to create alignment between the rights and responsibilities of employers and employees.

Recommendation 4

[23] Irrespective of whether our previous recommendations are followed, it would be worth taking another look at clause 1(2) of Schedule 1 of the Bill. Based on our reading of this clause, the current clause wording -

- a. does not account for the possibility of the hard deadline in clause 4(3) of the Bill taking effect on the 10th anniversary of Royal assent, and
- b. arguably fails to consider that statutory references to time periods that are expressed as continuing *until* a specific day include that day.⁴ (Based on the current drafting, both the Holidays Act 2003 and the Employment Leave Act 2026 seem to apply to an employee on the commencement date the Order in Council specifies.)

Sick leave

Hours-based accrual

[24] PPTA Te Wehengarua agrees that it is sensible to give employees sick leave from the first day of employment. However, we disagree with the suggested approach of using an

⁴ Legislation Act 2019, s54.

hours-based methodology for sick leave accrual. We would prefer an entitlement-based sick leave system that provides at least one full day of sick leave from the start of employment. For school teachers in particular, the chances to get sick when you first start working are substantial given the number of people you come into contact with - and teachers are clearly not the only occupation in this position.

[25] The public policy reasons for creating minimum, statutory sick leave entitlements are fundamentally different to those that apply to annual leave. In our view, which aligns with that of the Holidays Act Taskforce⁵, the different policy reasons behind the statutory entitlements to sick leave and annual leave warrant a differentiation in their accrual or entitlement mechanisms.

[26] Sick leave, family violence leave and bereavement leave exist to provide employees with paid leave for a particular event that the employee has no control over. Sickness can happen at any time during the employee's employment (or not at all). The availability of sick leave does not create a use case for this leave any more than the availability of bereavement leave creates bereavements. Drip-feeding employees fractional hours of sick leave for some of the employee's worked hours and creating a leave compensation payment for others is not a particularly practical way of ensuring that the employee's actual need is addressed at the time the employee (or their dependent) is unwell.

[27] Workers can choose to not go on holiday if they do not have any annual leave available, but they cannot make an equivalent choice for their sick leave. If you do not have sick leave available, you may still get sick regardless - which means that you either go unpaid (which puts unnecessary financial pressures and stresses on you and your whānau at a time when your health is already compromised) or you are forced to show up to work sick (endangering your health and that of people around you). Statutory minimum entitlements to sick leave should recognise that the need for a full day of sick leave may arise at any time after an employee starts working.

[28] The difficulties with the Bill's proposed sick leave accrual system are exacerbated by the Bill's insistence that sick leave is only accrued against standard hours - but it is docked against both standard and additional hours. The only discernible rationale for this is that the drafters of the legislation were concerned with minimising leave liabilities for employers - and to maximise the pressure on workers to show up to work irrespective of any health issues they/their whānau may face.⁶ We fundamentally disagree with this approach as it does not align with the purpose of providing a statutory floor for sick leave entitlements in the first place. The Bill's insistence on making leave and remuneration entitlements so heavily dependent on the type of hours worked by the employee rather than simply looking at the employee's overall employment also introduces an incredible amount of complexity to the proposed statutory set-up. This choice is perplexing given that the Bill is supposed to "achieve simplicity, clarity and

⁵ Holidays Act Taskforce *Holidays Act Taskforce Final Report*, above n1 at [107].

⁶ The availability of a Leave Compensation Payment does not alleviate this pressure.

improved compliance”⁷. The Bill’s incessant and, in our view, misguided focus on the type of hours someone works also makes the statutory provisions very difficult to apply to school teacher workforces given how these workforces have historically operated.

[29] The proposed sick leave accrual mechanism has further disadvantages: A worker currently has access to a full 10 days of sick leave after 6 months of employment.⁸ Under the new provisions, a full-time employee would need to work for an entire year to reach the same entitlement and a part-time employee even longer. In practice, this means that more workers will go without pay on days when they are unfit for work - leaving families without income.

[30] The move to an hours-based sick leave accrual system will particularly affect part-time employees and variable hours employees who will see their sick leave entitlements reduce significantly as the result of the proposed changes. This disadvantage will have a disproportionate effect on female-dominated workforces and on population demographics that are over-represented in casualised and insecure employment - which is yet another reason why we object to the proposal.

[31] Any argument that the current sick leave system under the Holidays Act 2003 is somehow unfair towards the employers of part-time employees conveniently ignores some of the common reasons why employees may choose to work part-time in the first place: Many employees work part-time because they have responsibilities associated with the care for young children, elderly parents or sick partners. Some employees also have health issues that make it impossible for them to work full-time. These reasons make it more likely that the part-time employee will have a proportionately greater need for sick leave than someone else who is able to concentrate on their career full-time. Given the overall benefit that businesses and organisations receive from their workforces, it is not unreasonable to expect employers to continue to provide their employees with the statutory minimum of 10 days of sick leave per year that the Holidays Act currently mandates.

Pay calculations

[32] PPTA Te Wehengarua is also concerned about the pay calculations that determine the rate of pay that sick leave (etc.) will be paid out at - because these rates do not look at what the employee would have been paid at the relevant time of the leave but solely look to the employment agreement’s pay for -

- a. a *standard hour* of work (for salaried employees and, in slightly modified form, also for averaged salary employees),

⁷ Employment Leave Bill, explanatory note at 1.

⁸ Holidays Act 2003, s63.

- b. the lowest hourly rate payable under the employee's employment agreement (waged employees).⁹

Again, this will mean that many employees will in practice receive less pay on the day they need to take leave than they would have expected to receive if they had been able to work.

Casualisation

- [33] Finally, we are concerned about the impacts of the proposed changes on casual employees and the proliferation of casual employment agreements. It is very unusual that the Employment Leave Bill creates separate provisions for employees who work casual hours at all - given that neither the Employment Relations Act 2000 nor the Holidays Act 2003 recognise casual employment as a distinct category in the first place. Under the proposed provisions, sick leave cannot be used for casual hours - irrespective of how regularly an employee works for their employer. This choice is regrettable not only because of the impact it will have on the employee who is unfit for work but feels pressured to show up to work anyway to feed their family, but also because of the incentives this choice creates for employers.
- [34] An employer concerned about the impact of increasing leave liabilities on their business/organisation will be incentivised to employ more and more staff on a casual basis. This will create less secure work for employees and, somewhat ironically, create fertile ground for a "race to the bottom" in terms of workers' overall employment conditions. We appreciate that the obvious objection to this line of reasoning will be that the introduction of a Leave Compensation Payment ("LCP") is intended to compensate employees working casual hours for this lack of sick leave (and annual leave) entitlements. However, this objection ignores the reality that employers will, over the long term, factor the need to pay this compensation into the pay rates and the pay arrangements they will offer to casual employees - even more so because not all remuneration that is payable to an employee under an employment agreement attracts the LCP in the first place¹⁰.
- [35] It is fanciful to expect that workers in insecure, casual employment who do not have the industrial strength to negotiate leave entitlements above the statutory floor will successfully negotiate for pay arrangements that compensate them completely for the loss of their previous leave entitlements. Similarly, the idea that the changes in the law will not lead to changes in employer behaviour to minimise costs is either disingenuous or hopelessly naïve. Businesses will utilize the new laws to save money and maximise profits. This is entirely predictable and it will mean that a sick worker who works casual hours will be under increased financial pressure to return back to work - even when doing so may endanger them or others.

⁹ Employment Leave Bill, cl 121.

¹⁰ i.e. penal rates.

[36] On the issue of casual workers, we also strongly object to the Bill's proposal to eliminate¹¹ any sick leave entitlements that the casual employee has accrued so far. Stripping workers of sick leave entitlements that they had already accrued prior to the new laws coming into effect is morally reprehensible and it is also very unusual as it essentially gives the new statutory provisions retrospective effect.

Recommendation 5

[37] Therefore, PPTA Te Wehengarua recommends that the changes to the sick leave provisions are not adopted.

Recommendation 6

[38] We recommend that a new statutory sick leave system is developed that ensures that -

- a. all employees have access to at least one day of sick leave from the first day of employment;
- b. sick leave entitlements focus on paying the employee what they would have been paid for the day or an average pay over their recent work history (whichever is higher);
- c. sick leave continues to accrue as an entitlement in days, and it should be deductible in days or part-days;
- d. part-time employees' entitlements to sick leave are not reduced when compared to the status quo;
- e. casual employees can become entitled to (and use) sick leave.

Annual Leave

Parental Leave Override

[39] Despite our concerns about the proposed annual leave provisions in the Bill overall, PPTA Te Wehengarua supports the proposal in the Bill to eliminate the *parental leave override*¹² in section 42(2) of the Parental Leave and Employment Protection Act 1987. This particular aspect of the current, statutory annual leave set-up is in desperate need of an overhaul. The parental leave override disadvantages new parents who take time off work to look after children and it is also a significant gender equity issue: After all, a clear majority of people who take parental leave are women, so they are far more likely to be disadvantaged by the way the current provisions operate. The interaction between parental leave and annual leave is also frequently misunderstood by employers and employees alike - which leads to compliance issues and/or unexpected financial

¹¹ Employment Leave Bill, Schedule 1, cl 13.

¹² This submission uses the term *parental leave override* to describe the statutory override in section 42(2) of the Parental Leave and Employment Protection Act 1987 that prescribes that any annual leave that an employee becomes entitled to during parental leave, during the period of preference, or in the 12 months following parental leave must only be paid out at the rate if the employee's average weekly earnings (instead of using the "greater of" comparison between ordinary weekly pay and average weekly earnings that would usually apply pursuant to s21 of the Holidays Act 2003).

consequences for both sides. Accordingly, we welcome the Bill's attempt to eliminate the parental leave override.

Change in statutory purpose

- [40] We note that the Bill changes the statutory purpose of annual leave: Under the Holidays Act, the purpose of providing minimum annual holidays to the employee is to give the employee “the opportunity for rest and recreation”¹³. The Bill simply says that minimum annual leave entitlements are provided to give the employee “the opportunity to take paid time away from work”¹⁴. The deliberate avoidance of any reference to “rest and recreation” is surprising - even more so, because the provision of “paid time away from work” is hardly a distinguishing feature of annual leave. We are concerned that the change in wording will make purposive interpretation of the legislation unworkable. A refusal to acknowledge that employees have a legitimate right to rest and recreation is also inherently counter-productive in a statute that aims to create minimum annual leave entitlements for employees.

Hours-based accrual

- [41] PPTA Te Wehengarua disagrees that annual leave should accrue in hours based on standard hours worked. The Holidays Act Taskforce's reasoning that supported continuing with a weeks-based entitlement system, because this system has the benefit of ensuring that annual leave entitlements automatically adjust to an employee's changing circumstances irrespective of increases or decreases in hours,¹⁵ is convincing.
- [42] The Bill's proposed hours-based accrual system¹⁶ could also have negative consequences for employers as it creates an unnecessary barrier for employees that may prevent them from accepting increases to their working hours if they fear that doing so could create problems for them in a few months' time when they may want to take a family vacation. The weeks-based entitlement system does not have this disadvantage as it is able to adjust to this change in circumstances. It also does not disadvantage employees reducing their hours, because employees still get the same number of weeks off work and the monetary value of this leave will factor in their previous, higher hours so long as the monetary value of the leave is not exclusively dependent on ordinary weekly pay (which it is not under the existing Holidays Act set-up).

¹³ Holidays Act 2003, s3(a).

¹⁴ Employment Leave Bill, cl3(a)(i).

¹⁵ Holidays Act Taskforce *Holidays Act Taskforce Final Report*, above n1 at [96].

¹⁶ Technically, the proposal in the Bill is not a pure accrual system as it combines the worst part of both system for the employee since annual accrues from the start of employment but the employee is not entitled to actually use this AL until they reach the anniversary of their start date. See Employment Leave Bill, cl 25.

- [43] We acknowledge that the determination of what “a week” is, can be difficult to determine in some employment scenarios. However, this is a problem that can be answered through the introduction of appropriate and clear statutory tests. It is not a reason that warrants the wholesale abandonment of our current annual leave system in favour of a new system that we already know will disadvantage some employees based on modelling the Holidays Act Taskforce has done.

No annual leave accrual during ACC leave

- [44] The Bill prescribes that annual leave will not accrue during periods when an employee is receiving accident compensation. We condemn this proposed change in the strongest possible terms. Changing minimum leave legislation to disadvantage injured and incapacitated workers is entirely unjustified and it is deeply concerning to PPTA Te Wehengarua. To put this bluntly: The proposed wording will shift leave liabilities from employers to injured workers and victims of sexual violence. This is as perplexing as it is cruel. Employers have been able to operate successfully in New Zealand for many years despite having to ensure that annual leave entitlements do not stop while a worker is on ACC. The idea that an employer will now save on annual leave entitlements, because one of their employees gets injured at work is particularly jarring.

Recommendation 7

- [45] PPTA Te Wehengarua recommends that the changes to annual leave are not adopted, and that a weeks-based entitlement system is created that ensures that -
- a. the parental leave override is eliminated, and
 - b. annual leave entitlements continue to apply for all categories currently mentioned in section 16(2)(a) of the Holidays Act 2003, and
 - c. annual leave retains the same statutory purpose it currently has under the Holidays Act.

New remediation process

- [46] We note that the Bill introduces a new remediation process to address past breaches of the Holidays Act. Details on what this process will look like remain sparse in the Bill and will be developed in regulations. This makes it inherently difficult to make meaningful submissions on this aspect of the Bill - which is worrying.
- [47] What is visible of the remediation process in the Bill is a cause for further concern. One of the most notable aspects of the new remediation regime is that the choice of whether the new remediation process will be used is made exclusively by the employer. This is quite remarkable given that the disadvantage that is being remediated is the employer's own breach of statutory law. The obvious question that arises is why an employer who has disadvantaged their employees by not following minimum employment rights legislation that has been in place for decades should be allowed to unilaterally choose the process that will be used to address their own failure to follow the law. The idea of

giving a perpetrator of an illegal act the choice of process to remedy the harm they have caused without giving the people that have been harmed by the actions any say in the matter is unacceptable.

[48] For similar reasons, we strongly disagree that previous employees should need to actively reach out to the employer within 2 years of the date a notice pursuant to clause 3(2)(b) of Schedule 3 of the Bill being issued in order to remain eligible for remediation of past breaches of the Holidays Act 2003. This obvious desire by the drafters of the legislation to save employers money is poorly conceived, because the money that is being saved by the employer is money that the employer did not have a legal right to in the first place - it has been illegally withheld from their employees.

Recommendation 8

[49] PPTA Te Wehengarua recommends that the Holidays Act remediation process provisions are not progressed. Should a new statutory Holidays Act remediation process be developed notwithstanding the objection from PPTA Te Wehengarua, entering into this remediation process should be a matter that is agreed mutually between the employer and their employees.

Other recommendations

- [50] We recommend that -
- a. the test for when a day is considered an “otherwise working day” in clauses 12 and 13 of the Bill is combined. This is to ensure that the analysis in clause 13 of the Bill that looks at the employee’s actual work history is not exclusively applied in those cases where the employment agreement does not specify days or patterns of days. The current set-up will otherwise create unfair outcomes for employees in circumstances where the reality of the hours an employee works is entirely disconnected from the days specified in their employment agreement.
 - b. alternative leave for working public holidays is provided as full days and not hours.
 - c. The ability to take bereavement leave and family violence leave from the start of employment with deductions happening in days or part-days is maintained in the Bill - with pay provisions, however, subject to the same criticisms and need for change that we have previously expressed in these submissions (see recommendation 6(b)).