



Fair Work Commission

Via Email: awards@fwc.gov.au

**Consultation on the Review of Part-Time Provisions in Certain Modern Awards
(AM2025/17)**

Dear Commissioners,

The Working with Women Alliance (WwWA) are grateful for the opportunity to consult on the scope of issues to be considered in proceedings pertaining to the *part-time provisions awards review* (the Review). The insights provided are informed by our work on economic equality, with a particular lens on working rights and conditions for women and gender-diverse people.

WwWA strongly endorses the establishment of a standard model for part-time employment across different modern awards. As the Review acknowledges, women are over-represented in part-time and casual employment (30% of women, compared to 11% of men work part-time¹) and in low-paying industries, often with poor working conditions and limited workplace rights.² Women are also more likely to hold multiple jobs, which means they may be navigating different models for part-time work simultaneously.³

Establishing a standard model for part-time employment will ensure that workers in female-dominated awards enjoy the same entitlements and protections as in male-dominated awards. This will strengthen women's workplace rights ensuring access to stable income and appropriate flexibility.

¹ Workplace Gender Equality Agency, 2023, *Wages and Ages: Mapping the Gender Pay Gap by Age*, Australian Government, <https://www.wgea.gov.au/publications/wages-and-ages>

² Women's Economic Equality Taskforce, 2023, *A 10-year plan to unleash the full-capacity and contributions of women to the Australian economy 2023-2033*, Australian Government, <https://www.pmc.gov.au/resources/10-year-plan>

³ Australian Bureau of Statistics, 2025, *Multiple job-holders*, Australian Government, <https://www.abs.gov.au/statistics/labour/jobs/multiple-job-holders/latest-release>

In relation to the *Issues to be considered*, WvWA proposes that:

- (1) The FWC should establish a standard model for part-time.
- (2) (3) Part-time employment should involve secure on-going employment with associated leave and benefit entitlements, as well as (at least) pro-rata access to training and employer provided supports.
- (4) (5) The FWC should set standard minimum payment periods, with any necessary variations enacted through *Individual Flexibility Arrangements (IFA)*.
- (6) Where part-time employees are required to work additional hours, these should be compensated or recouped through a time-in-lieu scheme or similar, unless otherwise specified through an IFA.

For part-time workers with caring responsibilities, many of whom are women, predictability of and agency over employment hours is key to child-care or respite access. The number of hours worked also impacts the number of child-care subsidy hours to which parents are entitled.⁴ Because of this, and because of interactions between social security and income, the number of hours a primary carer (usually a woman) works has a significant effect on her effective marginal tax rate.⁵

Discouraging excessive rates of overtime for men is also key to reducing the gender earnings gap, as this work is currently subsidised by the unpaid domestic labour of women.⁶

We look forward to working with the Fair Work Commission towards better working conditions and workplace equality for women.

Yours sincerely,

Dr Gemma Killen

Director – National Women’s Equality
Working with Women Alliance

⁴ Noting that the three-day guarantee for the child-care subsidy does not come into effect until 2026.

⁵ Ronindel, A., Kalb, G., Stewart, M., 2025, *Many parents – mostly mothers – lose family payments from the first dollar they earn.*, The Conversation, <https://theconversation.com/many-parents-mostly-mothers-lose-family-payments-from-the-first-dollar-they-earn-heres-how-we-could-fix-it-262119>

⁶ Strazdins, L., Leach, L., Doan, T., 2025, *New study finds the gender earnings gap could be halved if we reined in the long hours often worked by men*, The Conversation, <https://theconversation.com/new-study-finds-the-gender-earnings-gap-could-be-halved-if-we-reined-in-the-long-hours-often-worked-by-men-260815>