

Secure Australian Jobs Framework – Draft Framework

Chamber of Commerce and Industry of Western Australia
Submission

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Via: SecureJobsFramework@dewr.gov.au

Introduction

Thank you for the opportunity to provide a submission in relation to the Department of Employment and Workplace Relations' (DEWR) consultation on the draft Secure Australian Jobs Framework (draft Framework).

The Chamber of Commerce and Industry of Western Australia (CCIWA) is the peak body advancing trade and commerce in Western Australia (WA). We are fundamentally committed to using our insights to develop and advocate for public policies that help realise our vision to make WA the best place to live and do business.

In what follows, CCIWA provides overarching comments regarding the draft Secure Australian Jobs Framework, before providing specific comments and recommendations in **Appendix 1**.

Overarching Comments

CCIWA supports the objective of ensuring Commonwealth procurement delivers value for taxpayers, supports skilled employment and promotes productive workplaces. However, the draft Framework risks reducing competition, increasing compliance costs, limiting workforce flexibility and increasing procurement costs. As such, CCIWA does not support implementation of the draft Framework.

The total value of procurement contracts held by the Federal Government in 2024-25 was roughly \$105 billion.¹ This is a significant sum that should be harnessed to achieve key outcomes, including securing Australian jobs, as well as driving local innovation, growing emerging industries and lifting productivity. These objectives will only be achieved by an effective balance, ensuring that Australian industry is not stifled by the Framework.

People should be empowered to determine the form of employment that best suits them, as well as the needs of their employer. The proposed Framework seems to use government procurement to undermine this principle, by preferencing specific forms of employment, while duplicating existing legislative and regulatory requirements employers face.

Introducing the Framework's conditions will require suppliers to understand the new requirements, evaluate their current practices, develop new policies and processes, and potentially employ new staff to manage the extra workload. This burden diverts resources away from where they are most productive, with impacts for the broader economy.

These issues are of particular concern for small- and medium-sized enterprises (SMEs), who face constrained capabilities and capacities to deal with the cumulative effects of increasing regulatory compliance burden. Australian SMEs may no longer think that the benefits of tendering for Australian Government contracts are worth the costs. This would both reduce competition and erode the value for money the Federal Government seeks to achieve through procurement, as well as weaken the local SME base.

If the Government remains committed to implementing such a framework, CCIWA strongly recommends delaying implementation until Australia has reduced cost pressures and inflation – now is not the time to introduce new burdens on business – and exempting SMEs from the framework, as well as providing greater guidance and examples for suppliers.

Should you wish to discuss the content of this submission further, please do not hesitate to contact Dr Daniel Kiely, CCIWA Chief Economist, via email at Policy@cciwa.com.

¹ Department of Finance. [Statistics on Australian Government Procurement Contracts | Department of Finance](#). Data at 13 August 2025.

Appendix 1: CCIWA comments

CCIWA position	Recommendation
Overview The draft Framework imposes significant additional burdens on businesses, which will draw resources from productive activities. The draft Framework duplicates existing legislative and regulatory requirements for Australian businesses. Duplicative requirements should not be included in the Framework. CCIWA is deeply concerned that the increased costs associated with the additional obligations will discourage investments in Australia. Procurement should be used to increase competition, by supporting participation and removing barriers to innovation. Furthermore, to support compliance, the Framework must be clear in its scope, application, enforcement and appeal mechanisms, and definitions. A risk-based approach, informed by business size and contract value would be appropriate, and without retroactive application and extension to subcontractors.	CCIWA does not support implementation of the draft Framework. If the Government remains minded to implement a Framework, CCIWA strongly recommends delaying implementation until cost pressures and inflation ease, exempting SMEs from the Framework's obligations, and providing specific guidance for and examples of compliance. The Framework should not hamper business productivity, efficiency and flexibility, including the ability for employers and employees to make their own decisions.
Principle 1: Secure work and fair treatment of workers Preferencing direct and permanent employment, as in Principle 1 of the draft Framework, does not align with the idea of genuine agreement between employees and employers. Some of the requirements in the draft Framework effectively mandate various workplace practices which are inflexible, including restrictions on labour hire, casual and fixed-term arrangements. The draft Framework does not recognise SMEs regulatory and operational constraints. For example, Principle 1.3(c) requires suppliers to publicly report their modern slavery risks and actions, but the <i>Modern Slavery Act 2018</i> only requires entities with an annual consolidated revenue of over \$100 million to submit a formal modern slavery statement.	The Framework should recognise that best practice employment is, in fact, empowering employers and employees to determine the form of employment that best matches their interests, needs and circumstances. For example, the Framework should not enable government procurement to preference direct and permanent employment. The Framework should reflect a risk-based and proportionate approach that recognises SMEs' constraints.
Principle 2: Fair wages and conditions The idea of enabling people to determine their own form of employment is also undermined by the clear preference for enterprise agreement coverage and requirements for businesses without an enterprise agreement to demonstrate wages and conditions exceeding awards and industry standards through independent benchmarking. These provisions would provide leverage to force employers to sign enterprise agreements just so that they can tender for government contracts.	The Framework should exclude obligations that risk collaborative employer-employee relationships. For example, the Framework should not preference suppliers with enterprise agreements covered by a registered employee organisation.
Principle 3: Safe and healthy workplaces It is not clear why many of the provisions of Principle 3 are required, given that employers are already subject to strict work health and safety (WHS) obligations and standards at State and Federal levels, which are comprehensive and robustly enforced.	If the Framework is implemented, it should be made clear that compliance with existing legislative and regulatory obligations satisfy the Framework's requirements.
Principle 4: Promote gender equality and diversity CCIWA is supportive of fostering diversity in the workplace, as advocated in our Making paid work pay and Tapping the talent pool	The Framework should not place further administrative burden on Australian businesses, for risk of

reports. However, prescriptive requirements ignore that businesses can be constrained by their operating environments or commercial realities, particularly in SMEs and those in regional and remote Australia. By increasing administrative burden, these principles will only work to lock SMEs out of government contracts, with ramifications for the community, including for local jobs.	discouraging local SMEs from tendering for government contracts.
Principle 5: Support for local industry workforce capability and capacity development where possible Incorporating broad employment criteria, including workforce capability and capacity, into tender evaluations may reduce the supplier pool, resulting in less competition, higher costs and poorer value for taxpayers. The requirements of the draft framework add administrative burden for suppliers, requiring them to collate substantial documentation to present during procurement processes. It also adds considerable uncertainty as a business may be unclear as to how much evidence is enough. Businesses deserve clear guidance regarding assessment criteria, evidence requirements and compliance expectations.	If the Government remains minded to implement the Framework, it should, at least, provide clear guidance for suppliers on the evidence that would satisfy each principle and best practice indicator.