

12 May 2023

Department of Employment and Workplace Relations
GPO Box 9828
Canberra ACT 2601

Via email: WRSubmissions@dewr.gov.au.

Re: Same Job, Same Pay Consultation Paper

To Whom It May Concern:

The Association of Digital Service Providers Australia New Zealand (DSPANZ) welcomes the opportunity to make this submission on behalf of our members and the business software industry.

About DSPANZ

Digital Service Providers Australia New Zealand is the gateway for the government into the dynamic, world-class business software sector in Australia and Aotearoa New Zealand. [Our 90+ members](#) range from large, well-established companies to new and nimble innovators working at the cutting edge of business software and app development on both sides of the Tasman.

In line with our initial feedback on the Same Job, Same Pay measure, DSPANZ remains concerned that the burden of calculating the 'same pay' will fall on DSPs and the payroll and workforce management software they develop for employers.

Given that other pay-related calculations can often be done within payroll or workforce management software, many employers will expect their software to deliver a solution enabling them to ensure that any labour hire workers receive the same wages and entitlements as directly employed workers.

In many instances, the rates and payment rules required to calculate the 'same pay' would be set up in the host's payroll or workforce management system. However, the labour hire worker will typically be paid using the labour hire company's system, which will not have access to the host's data. Being unable to access this data readily will create complexity for DSPs in delivering a solution that assists employers.

If DSPs are expected to facilitate this calculation or comparison, DSPANZ recommends allowing 18 months at a minimum to enable DSPs to prepare themselves and their customers for the

complexities of this measure. We encourage DEWR to consult with DSPs through DSPANZ on how the measure is ultimately delivered.

DSPANZ welcomes the opportunity to provide further feedback on our submission.

Yours faithfully,

**Matthew Prouse,
President & Director
DSPANZ.**

