

Ref:FS;bs
14 January 2026

Mr David Hartley
Acting Commissioner
Queensland Ambulance Service
GPO Box 2477
BRISBANE QLD 4001

Email: QAS.Correspondence@ambulance.qld.gov.au

Dear Mr Hartley,

Re: Proposed cessation of SPL and COVID-related arrangements (QAS)

Thank you for your correspondence regarding the proposed cessation of Special Pandemic Leave (SPL) and other temporary COVID-related employment arrangements applying to Queensland Ambulance Service (QAS) operational employees.

The United Workers Union (UWU) acknowledges the consultation process being undertaken and provides the following submission for consideration prior to any final determination by the Director-General.

While the UWU recognises that the Public Health Emergency Declaration has concluded, we submit that the proposed cessation of these arrangements raises ongoing considerations relating to workforce health and safety, equity in leave access, and the management of occupational risk for QAS operational staff.

Of particular concern is the financial detriment experienced by employees who are required to access sick leave on weekends. QAS operational employees who become unwell on weekends have no practical capacity to alter, defer, or mitigate their attendance at work. In the absence of the temporary COVID-related arrangements, illness occurring on weekends may result in a direct financial penalty. This outcome is inequitable in its operation and risks creating a disincentive for employees to appropriately access sick leave.

In a frontline healthcare context, such an outcome is inconsistent with the obligations imposed on a person conducting a business or undertaking under the *Work Health and Safety Act 2011 (Qld)* to ensure, so far as is reasonably practicable, the health and safety of workers.

Measures that discourage the appropriate use of sick leave in circumstances involving illness or potential infection undermine effective risk management and infection prevention controls.

The UWU further submits that continued access to Special COVID Leave remains a reasonable and proportionate control measure in light of the elevated occupational exposure faced by QAS operational employees. Ambulance staff routinely provide emergency healthcare in uncontrolled environments, often without advance knowledge of a patient's infectious status. This materially increases exposure to communicable diseases, including COVID-19, relative to many other workforces.

Under the *Work Health and Safety Act 2011 (Qld)*, Queensland Health and the QAS are required to identify hazards, assess risks, and implement controls to eliminate or minimise risks so far as is reasonably practicable. The availability of Special COVID Leave has operated as an effective administrative control, supporting workers to comply with health guidance, reducing the risk of workplace transmission, and protecting both employees and the community. These risks remain inherent to ambulance operations notwithstanding the conclusion of the formal public health emergency.

The UWU acknowledges that the Queensland Ambulance Service Certified Agreement 2025 includes an additional 10 hours of personal leave. This negotiated improvement goes some way toward addressing the long-standing disparity between sick leave accrual rates and the deduction of leave in 12-hour shift blocks. However, this measure does not fully resolve the structural mismatch, nor does it address the specific and ongoing financial impact experienced when illness occurs on weekends.

In the UWU's view, the proposed removal of the temporary COVID-related arrangements, without adequate alternative measures to manage these risks, may be inconsistent with the duty to maintain a safe system of work and risks undermining employee wellbeing, fairness in access to leave entitlements, and effective health and safety risk management within the QAS.

UWU Position

Accordingly, the UWU's position is that:

- Continued access to Special COVID Leave for QAS operational employees remains necessary and appropriate as a reasonably practicable measure to manage ongoing occupational exposure risks; and
- The temporary arrangements that mitigate the financial impact of illness occurring on weekends should be retained, or alternative measures implemented, to avoid inequitable outcomes and unintended disincentives that may compromise health and safety objectives.



BIGGER, STRONGER, UNITED.

TIM KENNEDY SECRETARY
JO SCHOFIELD PRESIDENT

The UWU remains committed to engaging constructively with Queensland Health and the QAS to identify sustainable and equitable arrangements that appropriately reflect the continuing risks faced by frontline ambulance employees.

Your Sincerely,

A handwritten signature in blue ink, appearing to read "Fiona Scalon".

Fiona Scalon
National Ambulance Co-ordinator
United Workers Union