

1. Please indicate whether you are responding as

A business representative organisation (Trade association)

2. If responding as an employer, business, business owner or business representative, approximately what is the size of your business? If responding as an individual or worker, what size workplace are you employed in?

Large - ACS represents 50,486 convenience stores, employing around 443,00 people

3. Which region are you based in?

- North-East
- North-West
- Yorkshire and the Humber
- East Midlands
- West Midlands
- East of England
- London
- South-East
- South-West
- Wales
- Scotland
- Northern Ireland

4. If responding as an employer, business, business owner or business representative, what sector are you based in? If responding as an individual or worker, what sector do you work in?

Wholesale and retail trade

20. In your view, what would be the impact of extending unpaid carer's leave on employers?

The extension of unpaid carers leave would be particularly damaging for employers in the convenience sector. Covering shifts at short notice can be difficult for employers should unpaid carers leave be extended. This is likely to disproportionately impact small businesses, as fewer employees makes covering shifts at short notice particularly

difficult. Were unpaid carers leave to be extended; reasonable notice must be given so that employees are able to accommodate this new measure.

The administrative burden on businesses is also significant, with additional managing, tracking and processing required. This places additional pressure on businesses, who are already facing significant challenges such as the cost of trading and the need to adapt to incoming changes to employment rights.

ACS therefore supports current unpaid cares leave entitlements. The existing measures provide a balance between enabling employees to meet their caring responsibilities and allowing businesses to meet their staffing needs. At a time when trading is already difficult, the introduction of new measures should not place additional burdens on businesses but should ease these pressures and support businesses so they are able to support their employees.

26. In your view, what would be the impact of a “right to return” for unpaid carers on employers?

The introduction of a right to return is likely to pose significant challenges for employers. For smaller businesses with a limited number of staff, the feasibility of holding a post open for up to a year and the challenges this would pose must be considered. Any measures introduced must support businesses as well as carers by taking into account the practicality and feasibility of the measures. Businesses must be able to remain flexible to ensure that they are able to continue providing employment opportunities that are workable for employees with caring responsibilities and that any new measures do not have an adverse effect.

32. From your perspective, what would be the impact of introducing paid carer’s leave on employers?

The addition of introducing paid carers leave would be detrimental for employers, particularly alongside existing burdens. With rises to the NLW, NICs and upcoming reforms to zero-hour contracts, employers are already under significant pressures from rising employment costs. The cumulative cost burden from the introduction of paid leave would increase operational costs for retailers even more at a time when they are already struggling.

Because of the potential increase in cost burdens on employers, any measures introduced must ensure that employers have sufficient time to understand and prepare for their introduction.

33. In your view, what should the main government focus be for any immediate action following the review?

- Helping employers to support employees who are carers

46. Is there any other information that you think would be valuable to share on employment rights for unpaid carers, including parents of seriously ill children?

Employers cannot adequately support employees with caring responsibilities if they are under too much pressure from any measures that may be introduced. Immediate action must be to ensure that measures introduced do not result in greater pressures on businesses. With evidence that the convenience sector is already supporting its employees through the flexibility it can offer, new measures must enhance this support that employers can currently offer as opposed to restrict it.