



Vision Australia Submission

NDIS Workforce

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Prepared by: Veena Mishra, NDIS Lead.

Further enquiries, contact: Veena Mishra, NDIS Lead.



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Introduction

Vision Australia, as the largest national provider of services to people who are blind or have low vision, welcomes the opportunity to provide feedback to the Joint Standing Committee on the NDIS Workforce. Vision Australia employs over 285 staff that provide NDIS funded services to over 3000 participants.

Vision Australia alongside most of the disability sector faces workforce challenges ranging from recruiting specialist staff, particularly in regional and remote areas, to recognition of allied health professionals by NDIS. This submission proposes alignment with the health sector and a coordinated approach across disability and aged care sectors.

Recommendations

Vision Australia:

1. Proposes introduction of staff training and retention incentives for disability service providers that have staff based in regional and remote communities over and above the current regional loading provided by the NDIS to cover the costs of supervision and training.
2. Recommends extension of the Portable Long Service Scheme across all states to enable the disability and aged care sector to contribute towards a common staff benefit in a collaborative manner that incentivises more people to join the sector.
3. Supports recognition of Orthoptists by NDIS alongside Medicare recognised clinicians such as Optometrists to provide specialised services to people with low vision and blindness as part of the NDIS workforce.
4. Supports equivalent awards for the health, aged care and disability sector to create career mobility and progression. Standardised registration requirements and quality frameworks at state and federal levels will encourage development of a cross sector response to shortages in skilled staff.
5. Supports quotas to encourage employment of people with disabilities within the disability sector and in particular for NDIS registered service providers.



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1. Challenges in attracting and retaining the NDIS workforce, particularly in regional and remote communities.

Blindness and low vision is a low incidence disability within the overall disability market, as a result service providers working with this cohort require a workforce with unique roles including orientation and mobility specialists, orthoptists, Braille Instructors and assistive technology specialists. Furthermore, mainstream providers such as occupational therapists require additional skills that are unique to the blindness and low vision sector and are not common across the disability sector. Whilst it is recognised across the broader disability sector that allied health workers such as Occupational Therapists are difficult to recruit in regional and remote areas, this is significantly compounded for those roles that are unique to the blindness and low vision sector. This has resulted in Vision Australia and other similar providers resorting on occasions to filling long term vacancies in regional areas with overseas staff. This strategy is costly and not sustainable. Recruitment for more common allied health roles such as Occupational Therapy can take double the amount of time compared to metro roles and still require significant professional development to attain the specialist skill set required post commencement.

In order to address workforce shortages, metropolitan based staff often travel out to regional areas, incurring significant travel time and overnight stays which are only partially funded.

Vision Australia employs 20 skilled staff in regional and remote areas categorised as category 3 and 4 under the Modified Monash Model. We have found it very costly to sustain this dispersed specialist workforce with much of our services being provided in an episodic nature and without significant organisational financial support by Vision Australia people who are blind or have low vision would most likely not be able to access the required services locally.

Having a dispersed workforce also presents challenges in providing cost effective supervision for these remote and regional workers who commonly work in sole positions that also lack informal workplace support structures.

Vision Australia proposes introduction of incentives for disability service providers that have staff based in regional and remote communities over and above the current regional loading provided by the NDIS to cover the costs of supervision and training. Similar to supervision of provisional psychologists and medical graduates that attracts a fee payable to the experienced practitioner, systems that would encourage training and specialisation at a systemic level in conjunction with service providers are better suited for on the job training and potentially on-going employment.



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2. The role of Commonwealth Government policy in influencing the remuneration, conditions, working environment (including Workplace Health and Safety), career mobility and training needs of the NDIS workforce

Vision Australia competes with the health sector for allied health staff. The health sector awards provide better progression and promotion structures and greater opportunity to work across a diverse scope of practise.

Although national organisations such as Vision Australia are motivated to provide career mobility and progression opportunities, we are restricted by the NDIS funding rates and thin margins that prevent the required investment in training across the workforce, particularly in areas which require specialist training across sites and regions due to the additional administrative costs and the different rates of return on investment by state.

This is further complicated by a lack of specialist training in the mainstream education and training sector. For example, equipment and function specific training such as a Braille trainer is either an individual's responsibility that is obtained prior to entering the workforce or a development gap that is addressed by specialist service providers post recruitment. Vision Australia staff spend up to 4% of their time training to maintain registration and best practice knowledge.

There is a role for commonwealth government to incentivise service providers to invest in training within the disability sector by standardising awards and registration requirements across the health, aged care and disability sectors to promote career mobility and sharing of skilled personnel.

3. The role of State, Territory, Commonwealth Governments in providing and implementing a coordinated strategic workforce development plan for the NDIS workforce

Unlike the health sector, professionalization of the disability sector workforce has been through a generic capability framework introduced by the NDIS Quality and Safeguards Commission and certificate level courses in disability offered through the Vocational Education & Training (VET) system. Most workers within the disability sector provide personal care services in community or at specialised accommodation facilities including aged care. In the case of blindness and low vision service provision there is significant commonality across disability and aged care systems creating a cost effective opportunity to develop people in both systems in a more



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integrated manner. For example, teaching a person to use a mobility aid is not much different whether the person is 25 or 71 years of age.

A coordinated strategic workforce development plan that recognises the role differentiation that is required by different types of disabilities and by complexity will enhance the perception of the sector as one that provides greater career variety and progression.

Lack of recognition of specialist skill sets of eye health practitioners to inform NDIS eligibility criteria results in issues particularly within regional and remote areas causing bottlenecks in the system. For example, only Ophthalmologists can diagnose an eye condition. Given that the number of ophthalmologists in Australia (2019 DHS Health Workforce data) is approximately 900 and most work in the private sector in metropolitan areas, it is a challenge to get clients in rural and remote areas diagnosed in a timely manner.

Recognition of Orthoptists as trained eye health professionals to meet NDIS requirements for access requests would greatly improve participation in the scheme by rural and remote communities. Vision Australia is advocating for NDIS to expand the professions that can diagnose vision impairments to also include Optometrists and Orthoptists. Ideally reports by either Orthoptists or Optometrists should be sufficient evidence for a disability diagnosis however due to the low prevalence disability of our client cohort, this is low on the NDIS policy priority list.

Vision Australia supports recognition of trained eye health and allied health professionals alongside Medicare recognised clinicians to provide specialised services to people with a disability. This would create an agile sector that can better meet the needs of people with disabilities as well as an ageing population.

4. Interaction of NDIS workforce needs with employment in adjacent sectors including health and aged care

The care and support needs of people accessing aged care and disability services are similar at a personal care level. Vision Australia runs group programs that include both aged care and NDIS funded clients with disabilities for skill development and social interaction activities. However, the funding acquittal process and the staffing ratio requirements are different.

The nature of the roles for personal care and support workers lends itself towards a highly casualised workforce that would benefit from job security provided through standardised award across the two sectors.



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The recent introduction of the Portable Long Service Leave Scheme by the Victorian government for community service workers provides a systemic solution to career mobility within the disability sector. Particularly for independent contractors and the casual talent pool which tends to be dominated by lower skilled staff. Extension of the scheme across all states will enable the sector to contribute to staff development and career progression in a collaborative manner that incentivises more people to join the sector and specialise in niche areas.

Vision Australia supports having equivalent quality system for the health, aged care and disability sector to create career mobility and progression. Standardised requirements and quality frameworks at state and federal levels will encourage development of a cross sector response to shortages in skilled staff. A coordinated approach will encourage service providers to partner across sectors and enable people with disabilities to transition seamlessly as their needs change.

5. Opportunities available to, and challenges experienced by, people with disability currently employed, or wanting to be employed, within the NDIS workforce

Vision Australia believes in order to best service our clients, we highly value people who have a lived experience of vision loss within our workforce. We believe this improves our capability as a service provider to problem solve more effectively, make sound decisions, provide innovative solutions to care and most importantly act as a role model for other organisations.

Vision Australia has a set target of having 15% of our workforce as blind or have low vision and continues to support policies and strategies that recruit additional blind or have low vision staff into the organisation and to support and develop them to enable us to reinforce the importance of lived experience across our organisation as an important component of our culture.

NDIS Providers that do not recognise the importance of lived experience in their workforce will always be challenged in developing a culture that can best work alongside people with a disability. The NDIS has the opportunity to create workforce incentives, education and policies to support organisation cultural change for improved diversity in the workplace. This program would need to focus on four key areas.

1. Culture – Developing a culture where lived experience of disability is recognised and valued by leadership and all employees of the NDIS provider;



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2. Attract & Recruit – Develop innovative programs that target potential employees with disability and ensure recruitment practises maximise opportunities for people with a disability;
3. Retain & Develop- Ensure NDIS provider practises and systems are accessible to all staff and provide development opportunities including leadership development for staff that have a disability ; and
4. Transition – Embrace staff with disability to harness the NDIS provider as a springboard to gain other job opportunities to advance their careers beyond the provider.