

20 April 2020

Joint Standing Committee on the National Disability Insurance Scheme
PO Box 6100
Parliament House
Canberra ACT 2600

By email: ndis.sen@aph.gov.au

Dear Committee Members

Northcott Submission to the Joint Standing Committee on the National Disability Insurance Scheme inquiry on the NDIS workforce.

About Northcott

Northcott is a well-established disability services provider that has been supporting people with disability in New South Wales since 1929. We provide services across NSW as well as some allied health services (therapy) in the Australian Capital Territory. We have a workforce of over 2,200 staff and support around 14,000 people with disability, their families and their carers.

Northcott provides a wide range of disability supports ranging from therapy services to the provision of medical/disability care in group home settings. As such many of our customers are people with complex and multiple needs, some of which are a result of their disability and others that may be health-related.

Northcott is also a major provider of Supported Independent Living (SIL) services in range of settings from traditional Specialist Disability Accommodation group homes, to new housing models such as supporting SIL customers in private rental houses in metropolitan and regional areas across NSW.

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

In general, Northcott continues to experience long term difficulties in recruiting and retaining staff across a range of roles. In particular, Northcott finds that it is difficult to fill disability support worker, service coordinator, and managerial roles in regional areas of NSW. Northcott experiences difficulties recruiting behaviour support practitioners, occupational therapists, and speech therapists in all areas of the state.

An example of a workforce challenge posed by the future growth in the NDIS workforce is that another two to three group homes for people with disability will

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likely open in the Mid North Coast area of NSW over the next five years. Each group home will need approximately eight disability support workers at each home and one service coordinator between two to three homes. Northcott is currently experiencing difficulties in recruiting disability support workers and service coordinators with sufficient experience to its current homes in the area.

There are particular challenges recruiting staff in regional and remote locations associated with the nature of some of the customer support work which can be required in the mornings and late evening with less need during the middle of the day. Specifically, the time, regularity and location of the support requirements are all, quite properly, structured around the needs of the customers. For example, support for a customer with high personal care needs would typically involve assisting a customer in their own home with getting up in the morning and with personal care and then in the evening assisting the customer with personal care and getting into bed. In regional areas, in particular, recruiting to these requirements and being able to offer permanent part-time or casual staff enough hours on a regular basis is a challenge.

The interaction of NDIS workforce needs with employment in adjacent sectors including health and aged care

Across NSW and the ACT, Northcott is competing with the health and aged care sectors when recruiting disability support workers as those workers tend to be in the same pool as health care assistants, assistants in nursing, and aged care assistants who have somewhat transferable skills that allow them to work in any of the unregistered caregiver roles. Northcott employs a number of registered nurses to support people with complex disability and health conditions in its specialist supported accommodation, however the health sector pays higher rates for all clinical classifications and is generally able to offer more regular hours than disability support work.

In regional areas, Northcott is competing for workers with smaller community based organisations who have lower overheads and, as a result, are able to offer higher pay rates, which can make it difficult to attract staff to a larger organisation, such as Northcott.

Northcott has also seen a rise in the number of people working as private independent support workers, which further reduces the pool of people from which to recruit disability support workers. This is particularly so for less complex support work where customers may elect to seek a 'cheaper' option than a large provider, as the customer does not see a direct benefit from the higher 'back of house' costs borne by a larger provider, such as the training and quality improvement functions, that, nevertheless, bring benefits to all customers.

Generally, aged care workers are in high demand and the aged care sector will continue to be a significant competitor for staff as the population ages and the number of people in aged care accommodation services increases. Some Northcott casual disability support workers report that they find aged care work can be more consistent than disability support work due to less cancellations (where customers cancel booked supports at short notice) and more regular hours. Work in the sector

is often a 'last resort' for candidates with the work being seen as low paid, confronting, and with limited career progression; the workforce is highly casualised and transient.

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

The current COVID-19 pandemic has continually highlighted the essential services of the health and aged care sectors with the disability sector often being an afterthought in terms of planning and access to resources. We suspect this may also be true for job seekers who do not consider working in the disability sector because of its low profile. The current Australian labour market is not producing the high quality workforce that is needed to work with people with complex disabilities. The Commonwealth government could assist in the rectification of the labour market failure in the disability sector by providing better incentives for people to work in the sector by such measures as training programs targeting school leavers and students, the migrant workforce, and the Aboriginal and Torres Strait Islander workforce to work towards having candidates 'job ready' which would assist all providers in the sector.

The Commonwealth could have a role in setting out national recognised competency frameworks for the disability workforce in a manner similar to those for the various health professions. Such a scheme would benefit employers, in that it would greater certainty that job applicants have the requisite skills and it would benefit people in the disability workforce by giving them better career mobility. Such a scheme is of direct benefit to NDIS participants as it gives them greater assurance that the people providing their supports have the requisite skills.

The most direct Commonwealth policy influence on the remuneration of the NDIS workforce remains the NDIA price control framework, which limits what providers can charge for disability supports. When margins are overly tight or insufficient, organisations, such as Northcott struggle to offer remuneration that is competitive with other service providers and the health and aged care sectors to enable it to recruit and retain a suitably skilled, qualified, and experienced workforce. With low or insufficient margins, disability service providers face challenges in providing the necessary training to maintain a workforce that is sufficiently skilled to provide safe and effective supports to people with disability.

The workforce requirements to bring people into employment in the sector are particularly onerous. For example, before a person can start work in the sector probity checks are required; training, such as first aid, CPR, manual handling, medication competency and van safety, which are time consuming, must all be completed and require refreshing on a regular basis. The cost of this can be very much underestimated when the time of staff attending training and their backfill hours are taken into consideration. Northcott is a not-for-profit service provider yet it still finds it challenging to provide its workers with the necessary training within the current NDIS pricing regime.

Northcott notes with approval that 'the longer-term goal of the NDIA is to remove the need for price controls for disability supports'¹ as the development of a well-functioning, mature disability services market would permit services providers to determine for themselves the balance to be applied between unit pricing, wages, and overheads best suited to their market niche. As a not-for-profit service provider, Northcott would be well-placed to offer both competitive prices and wages in an unregulated price market.

People with complex disabilities, particularly those with intellectual disabilities and comorbidities, need appropriately staff trained to meet their needs and assist them to gain as much independence and living skills as they can. This requires not only skills in personal care and support, but also the ability to work with people with challenging behaviours and often unstable and/or chronic health conditions. Good disability support workers, like good healthcare and aged care workers, are vital to ensuring the human rights of the most vulnerable in our society are protected, as the current pandemic has shown. Having a NDIS pricing policy that enables providers to attract high quality staff and offer them suitable training and rewarding career paths is a vital to ensuring the availability of high quality services for people with disability.

The opportunities available to, and challenges experienced by, people with disability currently employed, or wanting to be employed, within the NDIS workforce

Disability support workers make up the largest proportion of workers in Northcott's group homes. Often, these workers provide high intensity personal care activities for people with complex disability and health needs. The physical requirements of these activities make it challenging for a person with a disability to fulfil the inherent requirements of these roles.

Currently, about two per cent of Northcott staff report having a disability and Northcott continues to seek to recruit people with disability into suitable roles.

Yours sincerely



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Chief Executive Officer
Northcott

¹ National Disability Insurance Agency (2019) *Issues Paper: Annual Price Review 2020-21*.