



Growing a skilled, valued and supported disability workforce





VCOSS Submission to the Joint Standing
Committee on the NDIS Workforce Inquiry

April 2020

The Victorian Council of Social Service is the peak body of the social and community sector in Victoria.

VCOSS members reflect the diversity of the sector and include large charities, peak organisations, small community services, advocacy groups and individuals interested in social policy.

In addition to supporting the sector, VCOSS represents the interests of Victorians experiencing poverty and disadvantage, and advocates for the development of a sustainable, fair and equitable society.

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This submission was prepared by Rhiannon Wapling and authorised by VCOSS CEO Emma King.

For enquiries please contact Deborah Fewster at

[Redacted contact information]

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VCOSS acknowledges the traditional owners of country and pays respect to past, present and emerging Elders.

This document was prepared on the lands of the Kulin Nation.



Overview

The Victorian Council of Social Service (VCOSS) welcomes the opportunity to provide input to the Joint Standing Committee on the National Disability Insurance Scheme (NDIS) Inquiry into the NDIS Workforce.

VCOSS is the peak body for social and community services in Victoria. Our members include charities, peak bodies, frontline service groups, advocacy organisations and individuals passionate about the development of a sustainable, fair and equitable society.

VCOSS advocates for systemic change to improve the lives of people with disability. We are deeply engaged in this issue through our wide range of members including disability advocacy organisations, people with disability, carer organisations and organisations which provide disability, mental health and health services. As part of our sector leadership, VCOSS supports Victorian disability advocacy organisations to undertake collaborative systemic advocacy under the banner of the 'Empowered Lives' campaign¹. This submission is informed by insights from Empowered Lives members.

VCOSS is committed to creating a strong and thriving community sector that is responsive to the community's needs. The community services industry is one of the biggest and fastest-growing sectors in Australia. Major changes driven by government reforms, particularly in disability and aged care, as well as the findings of ongoing inquiries and Royal Commissions will continue to transform the sector and the workforce.

Additionally, the transition to full scheme implementation is coinciding with recovery from, and response to, a number of major national emergencies, including the 2019/20 bushfires and the COVID-19 pandemic, the impacts of which are disproportionately experienced by people with disability, families and carers, and the disability workforce. It is important that this Inquiry acknowledges that there will be residual long-term issues to be addressed as part of broader recovery efforts from the bushfires and the pandemic, and for the purposes of ongoing emergency preparedness and response. VCOSS is unwavering in its support of a consumer-driven scheme that is centred on participant choice and control – however, the bushfires and pandemic have highlighted some of the faultlines in the NDIS's implementation. These are described later in this submission.

¹ VCOSS, *Empowered Lives*, accessed at empoweredlives.vcoss.org.au on 15 April 2020.

Challenges, changes and opportunities in the disability support sector

The NDIS has delivered a major shift in the way people with disability access support services. One of the key principles of the scheme is to deliver choice and control for people with disability to access the supports and services they want, when, where and how they choose.

To meet the increased demand driven by the NDIS, the disability workforce needs to grow substantially. Estimates show the Australian disability workforce needs to effectively double to meet anticipated demand and that one in five new jobs need to be for disability workers, largely in support worker roles².

Prior to the COVID-19 pandemic, the sector was growing strongly³, however, concerns persisted about the capacity of the sector and market to support the goals and needs of people with disability. Specifically, these concerns centred on:

- The composition and size of the current disability workforce, which is heavily casualised, ageing and low paid comparative to other caring roles. There is a gender equity lens to this too, as 80 per cent of employees in the disability sector are women⁴.
- The capacity of the sector and market to support the goals and needs of people with disability. Thin or immature markets prevent people with disability from accessing the services of their choice, or any services at all. This challenge is even greater for participants living in regional and remote communities and people with complex needs.
- The impact of NDIS pricing on service quality and availability, and the need to invest in attracting, retaining and supporting the disability workforce. These areas are of major concern for disability service providers⁵. VCOSS members report NDIS prices do not match the skills, expertise and time required to deliver effective and quality support services. Our members also believe that NDIS pricing does not adequately consider the costs of staff supervision and professional development, nor allow for the provision of best-practice models of support for people with complex needs.

² Productivity Commission, *National Disability Insurance Scheme (NDIS) Costs: Study Report*, October 2017, p.319; Department of Social Services, *Growing the NDIS Market and Workforce*, March 2019.

³ National Disability Services, *Australian Disability Workforce Report*, July 2018.

⁴ Productivity Commission, *National Disability Insurance Scheme (NDIS) Costs: Study Report*, October 2017; Job Outlook, *Aged and Disabled Carers*, accessed at joboutlook.gov.au/Occupation?search=Career&code=4231 on 11 March 2020; National Disability Services, *Australian Disability Workforce Report*, July 2018.

⁵ G Carey, M Weier, E Malbon, G Duff and H Dickinson, *How is the Disability sector faring? A report from National Disability Services' Annual Market Survey*, Centre for Social Impact Sydney, February 2020.

To grow the disability workforce and deliver on the promise of the NDIS:

- All levels of government must work with people with disability, disability service providers and education and training providers to develop a shared strategy and action plan. We welcome the Department of Social Services' work to develop a National NDIS Workforce Plan in partnership with the Commonwealth, states and territories⁶.
- The current state of the disability workforce must be thoroughly explored to identify gaps and opportunities to increase the size, skills and coverage of services. Government policies, pricing structures, pay rates and vocational training must all be considered and connected to drive work towards a collective goal.
- Quality and safeguarding measures should also be strengthened and harmonised to provide proactive, comprehensive and effective support for people with disability. Through a range of workforce focused initiatives, governments are well-placed to reduce confusion, increase consistency and close the gaps across current complaints bodies, laws and safety-focused strategies and frameworks. Workforce regulation and registration initiatives, such as the scheme operated in Northern Ireland by the Northern Ireland Social Care Council⁷, can be used to both implement and enforce quality and safeguarding measures while delivering benefits to workers, through access to professional development and greater recognition.

To achieve its aim of delivering choice and control, and enable access to safe, reliable support services, the NDIS must be supported by an agile, scalable workforce and responsive governments and services. The summer bushfire season and the ongoing COVID-19 pandemic have exposed and highlighted a range of existing systemic issues that impact people with disability, from equitable access to health services to cost of living pressures, the growing digital divide and the importance of informal and social supports⁸.

COVID-19 has placed pressure on a range of businesses, industries and workforces to adapt and respond rapidly to an ever-changing market. In some ways, the COVID-19 pandemic shines a light on some of the key challenges the relatively new NDIS market was already grappling with, including:

- Difficulties in attracting, retaining and supporting disability workers, given the often precarious nature of the work and low pay compared to other industries and roles
- Responding to fluctuations in demand, which, through COVID-19, present as both an increased need for one-on-one services and the cancellation of supports by some participants who want to reduce the risk of COVID-19 entering their home

⁶ Department of Social Services, *About the National NDIS Workforce Plan*, accessed at engage.dss.gov.au/national-ndis-workforce-plan on 11 March 2020.

⁷ Northern Ireland Social Care Council, *About NISCC*, accessed at nisc.info/about on 15 April 2020.

⁸ AFDO, *An Open Letter to National Cabinet: Immediate Actions Required for Australians with Disability in Response to Coronavirus (COVID19)*, April 2020.

- The loss of disability workers to other sectors and industries, which may offer better pay, conditions or job security
- The inadequacy of NDIS pricing in enabling providers to deliver quality, responsive services, which impacts the capacity of providers to pay staff to complete vital training, purchase personal protective equipment and re-model service delivery in-line with physical distancing measures.

While government interventions including the JobKeeper program⁹, advance payments and temporary price increases from the NDIS¹⁰, and other support for not-for-profit organisations will provide relief for some providers, there are concerns about the capacity of the disability support market to bounce back, especially in the context of legacy market issues.

It is crucial that all levels of government and the NDIA work together to support a strong and sustainable disability support market, through the COVID-19 pandemic and beyond, to ensure people with disability have choice and control. We were pleased to see this commitment demonstrated recently by the Council of Australian Governments (COAG) Disability Reform Council¹¹. The joint work underway to plan for continuity of service provision in the case of a COVID-19 outbreak in a disability support setting¹² is welcome, however, we urge all parties to extend this conversation to encompass broader continuity of support and provider of last resort arrangements for every scenario. Despite previous inquiries and recommendations by the Joint Standing Committee on these issues, responsibilities remain frighteningly unclear.

Through the COVID-19 pandemic, a range of industries have had to scale back or change their operations, stand down staff or close their doors. While longer-term impact of the pandemic for sectors is not yet clear, the high demand for disability workers and the growing numbers of displaced workers seeking new jobs presents a timely opportunity to promote careers in the community sector. Through free or subsidised vocational training initiatives, displaced workers could be encouraged to undertake further education and re-training to work in disability or aged care. Programs like the 'Working for Victoria' fund¹³ could also be leveraged to match workers to the immediate and longer-term needs of the community.

⁹ The Hon Josh Frydenberg, *Media release: Making it easier for charities to access JobKeeper*, 5 April 2020.

¹⁰ The Hon Stuart Robert, *Media release: New measures to support NDIS participants and providers through COVID-19*, 21 March 2020.

¹¹ Council of Australian Governments, *Meeting of the COAG Disability Reform Council Communique*, 9 April 2020.

¹² *Ibid.*

¹³ Victorian Government, *\$500 million support package for Victorian workers impacted by COVID-19*, accessed at www.vic.gov.au/workingforvictoria on 2 April 2020.

Recommendations

Across 11 submissions over the past four years, VCOSS has made a range of recommendations to support and strengthen the disability workforce. Many of these recommendations are yet to be addressed through a national, collaborative approach. We urge the Commonwealth, State and Territory governments and the National Disability Insurance Agency (NDIA) to work together to meet the existing and emerging challenges facing the disability support sector to in turn deliver better outcomes for people with disability across Australia.

Workforce size and composition

- All levels of government and the disability service sector must work together to:
 - Collect and publish detailed, real-time data on the state of the sector, including the size and demand of the market and workforce at a local level, as part of further development of the Boosting The Local Care Workforce Program
 - Conduct detailed analysis to identify market and workforce gaps
 - Develop a coordinated, evidence-based and actionable strategy with clear accountabilities and timelines.
- The NDIA needs to take a stronger lead as market steward to ensure there is adequate, equitable and appropriate supply of services to meet demand, particularly in regional, rural and remote areas. This includes the availability of culturally safe services and specialised supports for people with complex needs.

Workforce attraction, retention and development

- All levels of government must collaborate to deliver strategies, policies and investments that promote career options in disability services and employment pathways. Key actions include:
 - Broad and targeted promotion of employment opportunities in the sector, to increase the size and diversity of the workforce
 - Promoting careers in disability support, and community services more broadly, as part of strategies to support displaced workers and industries impacted by the coronavirus pandemic
 - Improving access to quality vocational training options and pathways, by reviewing course content, funding priority courses and placement to support participation, removing eligibility criteria for accessing government-funded courses, broadening access via online learning, and creating consistent resources for recognition of prior learning (RPL)
 - Encouraging and fostering industry partnerships with vocational training providers and universities
 - Boosting access to on-the-job learning by funding and incentivising providers to offer quality student placement programs
 - Increasing NDIS pricing and reviewing relevant awards to ensure workers are paid fairly.

- Support disability workers to build and grow their skills and capabilities by:
 - Co-designing a workforce capability framework in partnership with disability workers and people with disability, building on the work to date to design the NDIS Capability Framework¹⁴
 - Increasing NDIS pricing to reflect the true costs of service delivery, professional development and supervision
 - Developing shared learning resources for the disability workforce, to promote best-practice and reduce duplication.

Workforce quality and safeguards

- All levels of government must collaborate to develop and implement consistent quality and safeguarding measures that promote the rights, safety and wellbeing of people with disability, including workforce initiatives such as:
 - A robust and enforceable Code of Conduct for all disability workers, supported by a comprehensive communications and engagement strategy and mandatory training for workers
 - Consistent criminal history screening for all disability workers, building on the Intergovernmental Agreement on Nationally Consistent Worker Screening for the National Disability Insurance Scheme to extend coverage
 - A national worker exclusion register, leveraging the learnings from Victoria's Disability Worker Exclusion Scheme
 - A national registration scheme for all disability workers, which focuses on building the skills and professionalism of the workforce.

¹⁴ Department of Social Services, *Growing the NDIS Market and Workforce*, March 2019, p.9.

References

For further information, please refer to VCOSS's previous submissions related to this inquiry.

- [Supporting a strong, safe and sustainable sector: VCOSS Submission to the Victorian Disability Worker Regulation Scheme \(DWRS\) – February 2020](#)
- [Delivering on the promise: a better and fairer NDIS: VCOSS Submission to the Review of the NDIS Act and the new NDIS Participant Service Guarantee – October 2019](#)
- [Active market stewardship for the NDIS: VCOSS Submission to the NDIS Thin Markets Project – July 2019](#)
- [Making the 'gig economy' work for everybody: VCOSS submission to the Inquiry into the Victorian on-demand workforce – February 2019](#)
- [Strengthening the NDIS: VCOSS submission to NDIS Joint Standing Committee inquiry into market readiness for provision of services under the NDIS – March 2018](#)
- [A high quality disability workforce: VCOSS submission to registration and accreditation consultation paper – October 2017](#)
- [Ensuring a smooth transition to the NDIS: VCOSS Submission to NDIS Joint Standing Committee Inquiry into Transitional Arrangements for the NDIS – August 2017](#)
- [Safeguarding quality services for people with disability: VCOSS submission on the NDIS Amendment \(Quality and Safeguards Commission and Other Measures\) Bill – July 2017](#)
- [Measuring and managing NDIS scheme costs: VCOSS submission to the Productivity Commission's review of NDIS costs – July 2017](#)
- [Deliver high quality, safe services: VCOSS Submission on the NDIS Code of Conduct – June 2017](#)
- [Getting NDIS pricing right: VCOSS submission to the NDIS 2017 Price Controls Review – April 2017](#)



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