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Joint Standing Committee on the NDIS
PO Box 6100
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Carers NSW wishes to thank the Joint Standing Committee for the opportunity to provide a submission to its inquiry into the NDIS Workforce. This submission is informed by the experiences of family and friend carers of people living with a disability receiving support through the National Disability Insurance Scheme (NDIS) in New South Wales (NSW), as relayed to Carers NSW staff. It highlights the influence of systemic and legislative limitations which undermine the growth, quality and safety of the NDIS workforce, and the particular workforce issues that have a direct impact on carers. Recommendations made by Carers NSW are embedded throughout the submission.

A carer is any individual who provides care and support to a family member or friend who has a disability, mental illness, drug and/or alcohol dependency, chronic condition, terminal illness or who is frail. Carers NSW is the peak non-government organisation for carers in New South Wales (NSW). Our vision is an Australia that values and supports all carers, and our goals are to:

- Be a leading carer organisation in which carers have confidence
- Actively promote carer recognition and support
- Actively support carers to navigate a changing service landscape that will be characterised by ongoing policy reform
- Promote connected community experiences and opportunities for carers that are inclusive of diverse carer groups
- Lead and advocate for carer-specific and carer-inclusive policy making, research and service delivery
- Continue to be a quality-driven, responsive and carer-focused organisation.

Thank you for accepting our submission. For further information, please contact
Policy and Development Officer, on

Yours sincerely,

Elena Katrakis
CEO
Carers NSW

Background

The NDIS holds great potential to improve the lives of people with disability, their families and carers. However, in the transition from block funding to individualised funding, many service providers in NSW have reported significant challenges in meeting their workforce needs in order to provide holistic, high quality services to people living with disability. This has threatened to reduce, rather than increase choice and control for people living with disability in NSW, and placed pressure on carers to fill service gaps.

The Carers NSW 2018 Carer Survey, found that 61% of carers of people with disability under the age of 65 had experienced an increase in the amount of time they spend each week organising support for the person they care for, since the full NDIS rollout in 2016.¹ Unanticipated changes to long-term service provision arrangements, along with fewer on-the-ground service options, are likely to further increase the time spent by carers arranging support, in turn reducing the time they have to invest in self-care, employment and other pursuits.

The Joint Standing Committee on the NDIS inquiry into Market Readiness in 2018 highlighted a number of issues hindering workforce development. While some of these issues have been addressed, Carers NSW believes that many of the issues raised, including the transition to a market-based system, casualisation of the workforce, pricing, training and qualifications, and access to ongoing professional development, continue to hinder the growth and development of the disability workforce.

Bob's family have received in home services for over 40 years to support their daughter who is living with a disability.*

Bob reported that he and his wife (both over 60) are currently providing two of the services funded by the NDIS as they have been unable to source suitable care workers for the times required.

* Not his real name

Workforce demand

The pressures on the NDIS workforce will continue to increase as the Scheme expands and as participants continue to remain in the scheme as they age. It is estimated that up to 90,000 new positions will be created in the disability sector in the next 5 years.² However, with the aged care workforce also expected to treble by 2050,³ it is not clear whether the disability sector will be able to meet the increasing competing demand. An inability to meet workforce demands and ensure an adequately trained and experienced workforce to provide safe and high quality disability care will place additional strain on carers to independently source trained workers, and will increase existing concerns about the safety and quality of the care received by the people they care for.

¹ Carers NSW (2018), *Carers NSW 2018 Carer Survey: Summary report*. Available online at: <http://www.carersnsw.org.au/research/survey>.

² Department of Social Services (DSS) (2019), *Growing the NDIS Market and Workforce*. Available online at: https://www.dss.gov.au/sites/default/files/documents/03_2019/220319_-_ndis_market_and_workforce_strategy_acc-_pdf-.pdf, viewed, 13/04/2020.

³ Ibid.

The National Disability Services (NDS) *State of the Disability Sector Report 2019*,⁴ indicated that while the disability workforce has been growing rapidly, providers are continuing to report difficulty recruiting entry-level disability workers and sourcing and retaining allied health professionals. Pricing and the insecurity of income under the NDIS model have affected providers' ability to secure and retain staff, and in turn jeopardised the sustainability of service provision, with many providers continuing to report concerns about long term viability.⁵

Carers NSW acknowledges the work of the Australian Government in the development of the *Growing the NDIS Market and Workforce Strategy* and their commitment to the Sector Development Fund (SDF), the Jobs and Market Fund (JMF) and the Boosting the Local Care Workforce Program, as well as State and Territory initiatives to address ongoing workforce challenges. However, Carers NSW believes that a coordinated national approach, with clear accountability and reporting requirements that addresses systemic workforce barriers is necessary to ensure adequate paid care into the future and the success of the NDIS for participants, their families and carers.

The role of Australian Government policy

Australian Government policy plays a significant role in influencing the nature and conditions of the disability workforce. The roll-out of the NDIS has seen large scale casualisation of the disability sector workforce in order to enable increased flexibility and responsiveness to service user needs. While consumer-directed care has allowed for greater choice and competitiveness within the sector, it is evident employment conditions and the quality and availability of services have been directly affected by marketisation and demand for flexibility.

Tight margins due to NDIA pricing and the need for increased workforce flexibility within the NDIS model have resulted in workers facing low remunerations, underemployment, unmet personal costs, and an inability to access adequate training and support. With limited incentives to work in the disability sector, but the growing need for disability workers, turn over within the sector remains high and providers report significant difficulty sourcing and retaining adequately trained, appropriate staff.⁶

For carers, the inability to secure consistent, reliable, skilled staff often impacts their health and wellbeing, creating significant psychological distress where care provided may be unsafe or harmful to their care recipient. Furthermore, the inability to secure appropriate, reliable support workers can impact on carers' ability to engage in other activities, such as employment or education, as they cannot access suitable replacement care.

Pricing

The NDIA remains in control of setting the prices billable by service providers under the NDIS. Carers NSW has previously raised concerns that prices set by the NDIS do not adequately cover the cost of on the job training, continuing professional development and regular supervision. Similarly, Carers NSW has previously highlighted that the disability support

⁴ National Disability Services (2019). *State of the Disability Sector Report 2019*. Available online at: <https://www.nds.org.au/pdf-file/ffac29c2-6907-ea11-80e1-005056ac7853>, viewed 15 March 2020.

⁵ Ibid.

⁶ Ibid.

worker (DSW) cost model does not enable employers to hire adequately trained staff to support participants with complex needs and their carers.⁷

The Productivity Commission's *NDIS Costs Paper* (2017)⁸ noted that providers had indicated that the attendant care prices specified by the NDIA may be too low to achieve safe and quality outcomes. The NDS *State of the Disability Sector Report 2019*,⁹ indicated that pricing structures, which still do not adequately cover overhead costs such as training and development, supervision and staff meetings, continue to place participants and support staff at significantly heightened risk. Furthermore, the report found that ongoing low margins impact on the ability of service providers to develop and implement organisational policy practice and standards to effectively implement the NDIS quality and safeguards framework.¹⁰

The release of the *NDIS Price Guide 2019-20*¹¹ has seen an increase in attendant care rates, the introduction of billable non-face-to-face service provision and the introduction of the Temporary Transformation Payment (TTP). However, The NDS *State of the Disability Sector Report 2019*,¹² indicated that in a follow-up survey with providers once changes to the Temporary Transformation Payment had been announced, 76% said they were concerned they will be unable to provide NDIS services at current prices. Ongoing intervention by the National Disability Insurance Agency (NDIA) is required to proactively address potential risks to the quality of services and ensure the safety of participants and their carers.

Carers NSW recommends the continual review of the NDIS price guide be overseen by an independent body, such as the Pricing Reference Group (PRG), to ensure prices adequately cover the cost of appropriately skilled workers, as well as additional costs associated with induction, ongoing training and supervision, and non-face-to-face costs incurred by NDIS staff and providers.

In addition to the above, the Cost Model for DSW should be reviewed in light of the upcoming cessation of Equal Remuneration Order (ERO) supplements. It is likely that many large providers who have been receiving state or territory ERO supplements for their business outside of the NDIS will be impacted by the changes. This will place further financial strain on providers and may jeopardise the quality of care where training and supervision overheads can no longer be met.

Remuneration

There is ongoing review of the Social, Community, Home Care and Disability Services Industry Award (SCHADS) by the Fair Work Commission (FWC) to address a number of issues associated with casualisation of the workforce and unmet costs for workers, such as travel

⁷ Productivity Commission (PC) (2019), Draft Report: Mental health, volume 1. Available online at: <https://www.pc.gov.au/inquiries/current/mental-health/draft/mental-health-draft-volume1.pdf>, viewed 15 March 2020.

⁸ Productivity Commission 2017, *National Disability Insurance Scheme (NDIS) Costs*, Study Report, Canberra. Available online at: <https://www.pc.gov.au/inquiries/completed/ndis-costs/report/ndis-costs-overview.pdf>.

⁹ National Disability Services (2019). *State of the Disability Sector Report 2019*. Available online at: <https://www.nds.org.au/pdf-file/ffac29c2-6907-ea11-80e1-005056ac7853>, viewed 15 March 2020.

¹⁰ Ibid

¹¹ NDIA (2019). *NDIS Price Guide 2019-2020*. Available online at: <https://www.ndis.gov.au/media/1455/download>.

¹² National Disability Services (2018). *State of the Disability Sector Report 2019*. Available online at: <https://www.nds.org.au/pdf-file/d3f2aa1f-52e9-e811-80cf-005056ac7853>.

time and phone allowances, within the NDIS model.¹³ However, remuneration remains a barrier to meeting disability sector workforce needs. Failure to ensure competitive and attractive remuneration for current and potential disability sector workers is likely to result in the continued departure of highly skilled and experienced staff from the industry, as well as difficulty recruiting new individuals to the sector.

Carers NSW recommends a review of remuneration for disability sector workers, including a review of the SCHADS modern award to ensure the adequacy of wages for disability sector employees. Following a review of remuneration and the implementation of any improvements or increases in wages or entitlements, Carers NSW believes that the NDIA must review its Price Guide to align with changes to remunerations, indexing NDIS plans automatically to ensure no disadvantage to participants and their carers.

Training and qualifications

Carers NSW remains concerned that there are no minimum qualifications required for direct support workers within the NDIS. While Carers NSW commends the work of dedicated support workers who perform disability support work without adequate training and formal qualifications, we have concerns that within a market system, without minimum requirements, individuals with limited background or experience in the disability sector may be able to offer services at a lower price which are appealing to participants and their carers. However, this may place NDIS participants, their families, carers and disability workers at increased risk of significant injury or harm as workers are not adequately skilled to perform tasks.

Carers NSW understands that the NDIS Quality and Safeguards Commission is currently developing an NDIS Capability Framework. However, Carers NSW believes that there should be clear, nationally consistent guidelines which articulate minimum qualifications to provide specific service types which safeguard participants, their families and carers, as well as members of the workforce. Furthermore, in alignment with the *Carer Recognition Act 2010 (Cwth)*, Carers NSW believes that a foundational unit focusing on carers and facilitating carer inclusion as 'partners in care' should be required in all disability care and allied health education and training packages. This will ensure that future disability sector workers are aware of carers, understand their role and are equipped to work effectively with carers to enable optimal outcomes for people with disability.

A single care workforce

Ongoing changes to the nature of employment in care sectors, resulting in insecure and variable hours, have seen an increasing number of paid care workers finding employment across multiple care sectors (i.e. aged care, disability and health). Carers NSW is concerned that a lack of information sharing between aged care, health and disability quality and safety bodies may place participants at increased risk of potential abuse or neglect, where a worker may be involved in an incident in one sector but this remains unknown to the NDIS Quality and Safeguards Commission.

Carers NSW commends the introduction of the NDIS Worker Screening Database by the NDIS Quality and Safeguards Commission. However, Carers NSW recommends that the Government ensure adequate information sharing between quality and safety bodies to

¹³ National Disability Services (NDS) (2019).

enable the sharing of incident reports to safeguard NDIS participants from workers who may have been involved in incidents in other care sectors. Furthermore, Carers NSW recommends that the Government plan for the eventual merging of worker registration databases across care sectors, developing one national body that oversees all care industry workers not covered under pre-existing regulation to maximise the safety of NDIS participants and their carers.

Conclusion

Carers NSW commends the Joint Standing Committee on the NDIS as it works to improve the experiences of participants, their families and carers. This inquiry into the NDIS workforce provides a valuable opportunity to identify ongoing challenges faced by the workforce and opportunities to build and strengthen the NDIS workforce as demand increases. Carers NSW thanks the Committee for the opportunity to respond and believes that without adequate steps taken by the Government to address current and future workforce shortages, carers will be increasingly relied upon to fill service gaps, jeopardising the sustainability of caring arrangements and the success of the scheme.