



# Submission to the Joint Standing Committee on the National Disability Insurance Scheme

## Inquiry on the NDIS Workforce

April 2020



## Executive Summary

Australia already has a shortage of NDIS workers and once at full scheme, there will be insufficient workers to meet participants' needs.

The key to making it attractive to people to be part of the NDIS workforce is to offer career pathways. Australia can start right now to start to improve career pathways in this sector by:

- = putting in place structures and infrastructure to attract and retain workers
- = aligning industrial and funding arrangements
- = supporting organisations that are committed to training and developing staff.

The structures and infrastructure that will attract and retain workers in the disability sector include:

- = career progression opportunities
- = professional development
- = skills and capability development
- = recognition of disability support as a profession
- = greater awareness of the opportunities in the sector
- = rewarding and satisfying work.

The benefits of developing career pathways are wide-ranging, including:

- = the Government will have a sustainable NDIS workforce with the necessary skills and scale, reduced costs of retraining and high-quality outcomes for people with disability.
- = employees will have attractive incomes, secure work, an increase in permanent roles relative to casual ones, and opportunities to improve their lives.
- = service providers will have satisfied customers, a stable workforce, and reduction in risks that arise from staff turnover, insufficient staff and gaps in training.
- = communities will be strengthened by the growth in incomes and employment levels.

Training is fundamental to career pathways and NDIS outcomes. Funding factors affect the cost of training and staff being able to spend time on it. We believe that the Commonwealth Government should give preferences and support to organisations that are committed to developing workers and investing in practice and research.

We encourage the Government to explore:

- = the development of infrastructure which supports recruitment, training and secure employment
- = portability of staff entitlements, accredited training and skills
- = structures for collaboration among organisations, such as coordinated deployment of staff
- = specific solutions for remote and regional areas.

For Australia to have culturally relevant and safe NDIS services, support and choice, it also needs a dedicated First Nations NDIS workforce strategy.

This submission builds on Lifestyle Solutions' experience with a workforce of more than 2,200 people in operations across Australia, in capital and regional cities, regional areas and remote locations.

## Introduction

The experience that Lifestyle Solutions brings to the subject of the NDIS Workforce comes from 18 years of providing services to people with disability. The organisation was founded to meet people's needs in a new way, and we continue to be an innovator.

We employ approximately 2,200 people, including:

- = Disability support workers – the majority of our workforce
- = Allied health professionals
- = Business support professionals
- = Safeguarding, quality and specialist professionals.

We recruit approximately 1,000 staff per annum to enable the staffing levels we need.

We operate in New South Wales, Queensland, the Northern Territory, Western Australia, Victoria and Tasmania. In the most populous States our workforce mainly reside in metropolitan areas. In contrast, in Tasmania they nearly all reside in regional centres or regional areas, and in the Northern Territory most live in remote or very remote areas. This reflects the diverse locations in which we deliver services.

Many of the NDIS participants we support in regional and remote locations (9% and 30% respectively) are Aboriginal and/or Torres Strait Islander people.

We provide services designed to meet NDIS participants' everyday needs and support them to achieve their goals, including:

- = Accommodation
- = Support for everyday living
- = Support coordination
- = Tenancy support
- = Intensive supports.

We are a not-for-profit entity and among Australia's largest providers of disability services.

In this submission we address each of the topics for this Inquiry that have been identified by the Joint Standing Committee.

### **a. The current size of the NDIS workforce and projections at full scheme**

This Inquiry is raising awareness of a very important issue for the NDIS. Action is needed for Australia to have sufficient workers to meet the needs of NDIS participants once the Scheme is at full demand, particularly when considering retirements and exits, competition across sectors and the increasing capabilities and standards for new entrants to the sector. These factors are particularly acute in remote and regional areas.

Some of the solutions to scaling up the workforce will take over a decade to fully bear fruit. This is a nation-building exercise – and one that requires close collaboration across all jurisdictions and many types of organisations. Australia can start right now by building career pathways in disability services, including by:

- = putting in place infrastructure to attract and retain workers, notably to enable career pathways
- = aligning industrial and funding arrangements
- = supporting organisations that are committed to training and developing staff, through, for example, development grants, traineeships, placements, apprenticeships and cross-sector collaborations.

### **b. Challenges in attracting and retaining the NDIS workforce**

Providers of NDIS services compete with a range of other sectors to attract and retain workers. Many other sectors that can employ people with similar capabilities offer greater reliability, pay, predictability of work

and continuity in roles and careers. Competition comes not only from adjacent sectors such as aged care but also from retail work and the mining industry in regional and remote areas.

**Limited career progress** is a key challenge to attracting and retaining both disability support workers and allied health workers. Career pathways are key to making it attractive to people to be part of Australia's NDIS workforce. Enabling people to develop a career pathway requires structures and infrastructure that offer:

- = career progress opportunities
- = professional development
- = skills and capability development
- = disability support being recognised as a profession and valued by society
- = greater awareness of the opportunities in the sector
- = more permanent roles
- = rewarding and satisfying work.<sup>1</sup>

**The lack of secure employment** is also a key challenge in attracting and retaining disability support workers.

What holds service providers back from overcoming these challenges? Two of the **key constraints** are:

- = Industrial structures do not align with funding arrangements and participant needs.
- = The NDIS does not cover funding for training.

**The benefits** of Australia developing career pathways in the disability sector are wide-ranging:

- = The Government will have a sustainable NDIS workforce with the necessary skills and scale, reduced costs of retraining, and high-quality outcomes for people with disability.
- = Employees will have attractive incomes, predictable/secure work, an increase in permanent roles relative to casual ones, and opportunities to improve their lives and social standing.
- = Service providers will have satisfied customers, a stable workforce, and a reduction in risks that arise from staff turnover, insufficient staff and gaps in training.
- = Communities will be strengthened by the growth in incomes and employment levels.

**The potential pipeline** of people into the NDIS workforce is large.

- = Many people are attracted to this sector by experiences in their lives, such as knowing someone with disability or themselves having a disability.
- = People who work in sectors such as hospitality, travel and airlines have the understanding of customer service, quality and risk reduction that are essential in disability services. Many are also already trained in first aid, dealing with people feeling stressed or anxious, and assisting with the mobility of disabled people. Soon after the COVID-19 pandemic hit Australian economic activity, Lifestyle Solutions contacted a number of large hospitality, travel and airline companies to offer to partner with them to take on their workers who were being stood down or made redundant. We saw this as a strategic opportunity to build our capacity to meet the needs of NDIS participants and to contribute to national well-being more broadly.
- = Sector-specific training gives recruits from other sectors the knowledge they need of, for example, customer needs, the regulatory environment and the expected outcomes of the NDIS.
- = NDIS participants are more diverse than the current NDIS workforce. There is potential for the workforce to engage more First Nations, Cultural and Linguistically Diverse, and LGBTQI+ people.

However, there are challenges in taking advantage of this broad pipeline. For example, our evidence indicates that people are currently attracted to be part of the NDIS workforce by the ability to make a difference for customers but that the future workforce from other sectors may have different motivations.

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<sup>1</sup> Many of these points also apply in the aged care sector. In its *Interim Report*, the Royal Commission into Aged Care Quality and Safety wrote that: "The sector needs to promote itself as an employer of choice to meet its future workforce demand projections and compete with other human service industries for high quality people. An employer of choice is one that can attract people by offering superior work conditions, career paths, training and professional development, and rewarding and satisfying work." (Royal Commission into Aged Care and Quality, *Interim Report: Neglect*, Volume 1, Commonwealth of Australia, 2019, p219)

In addition, there are specific challenges in attracting allied health professionals. These challenges begin at universities, where too few graduates are aware of the sector, encouraged to enter it and able to gain initial experience due to too few placement opportunities. This calls for greater promotion of the sector in universities and making it more credible to be an allied health professional in this sector.

### **Regional and remote communities**

We are familiar with the challenges in regional remote communities, including locations as diverse as rural properties in western NSW, remote centres such as Port Hedland and Alice Springs and King Island.

Regional and remote areas have small pools of candidates and considerable competition for them, including from other sectors such as the mining industry. Elements of the population are more transient than in other areas of Australia. The cost of living is higher. These factors play out in higher costs for providers in staff recruitment, orientation, cultural induction and training as well as in turnover.

These factors are similar to the cultural and geographic barriers to providing a quality aged care workforce in regional and remote areas that have been highlighted by the Royal Commission into Aged Care Quality and Safety. They include limited access to training providers in remote locations, limited career progress opportunities, restrictions on flexible staffing between residential and home care services, negative perceptions of the aged care sector and the high cost of agency staff. The Royal Commission also noted the importance of understanding a local community's culture and environment and of orientation activities, especially so staff know what to expect.<sup>2</sup>

The NDIS Thin Markets Project looked at workforce recruitment, retention and training in areas such as regional and remote Australia. In the Lifestyle Solutions submission to that project consultation we discussed the potential benefits to NDIS participants of the NDIA developing strategic contract arrangements with service providers with a proven track record of delivering services in remote or geographically isolated locations. Such contract arrangements could include initiatives related to workforce planning, including:

- = workforce recruitment, training and on-going support
- = coordination of training
- = shared back-up arrangements to ensure continuity of support during staff shortages, absences and emergencies.

Arrangements like these would help to overcome the challenges of small providers in place-based models of care that were discussed in the Aged Care Royal Commission *Interim Report*, such as an inability to achieve economies of scale and the additional costs associated with remote locations.<sup>3</sup>

## **c. Commonwealth Government policy**

### **Remuneration and conditions**

The Commonwealth has an important role to play in encouraging **workforce models** that provide:

- = flexibility, reliable income, adequate hours of work, meaningful work, mutual support and respect, an appropriate amount of autonomy, employment security and career progress for the worker
- = flexibility, cost-efficiency and a more attractive workforce proposition for the provider
- = accessibility, consistency and affordability for the NDIS participant.

This is what Lifestyle Solutions is doing with the innovative, flat, team-based structure called Better Service that we are rolling out and the collaborative and innovative employment relations and human resources practices that Lifestyle Solutions, our staff and the Australian Services Union have implemented under the 'new approaches division' of the Fair Work Commission.

Better alignment between funding and industrial relations arrangements would make disability sector work financially attractive to workers and deliver better outcomes for participants.

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<sup>2</sup> *ibid*, pp186-187

<sup>3</sup> *ibid*, p171

- = For example, it would make it more viable for a NDIS participant to have a live-in carer for a period of time.
- = Rostering staff to participant needs is a complex task, made more so by some aspects of the SCHADS Award, especially in areas with fewer workers and participants.
- = Remuneration structures should also reward staff who improve their qualifications and skills.

All these aspects of remuneration depend on appropriate funding arrangements in the NDIS.

### **Career mobility**

Career mobility will be strengthened by:

- = career pathways, as discussed above
- = a national accreditation framework that accredits workers, enables workers and service providers to be confident about the standards that workers have attained, and incentivises workers to improve their skills
- = portability of staff entitlements (such as leave), accredited training and skills
- = collaboration among organisations, including coordinated deployment of staff across the sector.

### **Training needs**

Training programs in universities and VET are key to the sector being perceived as a profession and to potential members of the workforce finding their way into roles. Training within organisations is fundamental to onboarding, career pathways and delivering NDIS outcomes.

- = Workers are more satisfied with their roles when they are well trained. It increases their confidence in their actions and decisions.
- = Increasing workers' sense of empowerment to do their jobs well helps to retain high quality employees.<sup>4</sup> (This is central to our Better Service team-based approach.)
- = Training improves workforce utilisation, as workers can more easily share workloads with colleagues.

NDIS pricing and funding factors affect the cost of training and staff being able to spend time in training. Lifestyle Solutions has been increasing our investment in training, within our current funding envelope and using our own reserves. This reduces the funds we could apply to other aspects of our organisation.

We believe that the Commonwealth Government should give preferences and support to organisations that are committed to developing workers and investing in practice and research, in contrast to labour hire firms.

There is a case for additional funding such as grants for training development and capacity-building. This could be made available to collaborations of service providers, for scale of impact, greater cost-benefit, faster adoption and broader applicability. With appropriate grants and other forms of funding, organisations in the sector could together build capacity, and integrate and coordinate approaches for workforce development.

## **d. Role of State, Territory, Commonwealth Governments in providing and implementing a coordinated strategic workforce development plan**

A more coordinated approach between States / Territories and the Commonwealth would reduce overall costs, enhance compliance and support the delivery of quality service for participants. One specific area for consideration is closer alignment between State funding and Commonwealth employment laws / awards. Another area is training, where a consistent framework for workforce development would benefit:

- = disability support workers and allied health workers, by making it easier to move across States and Territories

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<sup>4</sup> The Royal Commission into Aged Care Quality and Safety refers to this concept as 'enablement' (Ibid, p227)

- = service providers, by reducing the cost impost of multiple training, reporting and probity requirements, freeing up funds to be invested in training and other aspects of workforce development
- = Governments, by improving access to skills as well as efficiency and effectiveness within departments and agencies.

NDIS workforce planning also needs to take account of the roles of State, Territory and Commonwealth governments in adjacent sectors. For example, Lifestyle Solutions provides out of home care as well as disability services. The former is in the jurisdiction of States/Territories while the latter is largely within the Commonwealth's jurisdiction.

## **e. Interaction with employment in adjacent sectors**

Competition for workers within adjacent sectors is inevitable and especially a factor in regional and remote areas where there is strong competition for skills. We encourage the Government to explore:

- = shared pools of workers
- = training, accreditation and mandatory minimum qualifications that are recognised and portable across sectors
- = portability of skills across sectors
- = structures for collaboration among organisations across sectors
- = specific solutions for remote and regional areas, where staff can especially lack access to training providers.

Adjacent sectors are ideally positioned for this:

- = The cost of training and retraining is significant.
- = Workers would have more work opportunities, which would be especially beneficial in areas where there are lower numbers of NDIS participants, such as remote areas.
- = The disability sector and adjacent sectors such as aged care are highly casualised.
- = The result would be a more sustainable workforce across all adjacent sectors.

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

Service providers face challenges in employing people with disability. Sector wide frameworks, greater awareness of potential and opportunities, and targeted support and assistance would enable people with disability to participate more successfully in the NDIS workforce.

- = People with lived experience of a disability have much to offer for the NDIS workforce, for example as case managers and support coordinators.
- = A systematic, sector-wide understanding of the inherent requirements of roles in the sector would enable better mapping of what a specific role requires by way of physical and cognitive capacities, for example. Such a framework is currently lacking, which puts the onus on individual organisations to undertake this analysis, which is fragmented and less cost-effective.
- = For some people with disability, the process of applying for a role is a barrier. This could be addressed by targeted support, at least initially until these processes are adopted as standard business practices.
- = This would represent a move away from the Australian Disability Enterprises (ADE) model to people with disability gaining roles in the real workforce.

The Disability Confident Recruiter program is commendable. However, the time and funding that it requires of providers creates a hurdle to greater uptake.

## **g. Other matters**

### **First Nations workforce**

For Australia to have culturally relevant and safe NDIS services, support and choice, it needs a dedicated First Nations NDIS workforce strategy to:

- = Develop a First Nations workforce, especially in rural and remote communities
- = Support access on Country, with families and in communities
- = Provide services that are culturally relevant, culturally appropriate, and which provide NDIS Participants with cultural safety and cultural security<sup>5</sup>
- = Provide a framework for preferencing candidates based on customer cultural needs
- = Support an understanding of cultural safety / competency that aids retention and progression of First Nations people in mainstream organisations (e.g. understanding of cultural obligations)<sup>6</sup>
- = Recognise barriers to employing First Nations staff in remoter locations<sup>7</sup>
- = Generate sustainable employment in communities
- = Tailor services to community needs
- = Increase the disability workforce overall in regional and remote Australia.

### **For more information**

If you would like more information about our experience, initiatives underway at Lifestyle Solutions or other aspects of Lifestyle Solutions, please contact our CEO, Mr Andrew Hyland.

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<sup>5</sup> A number of aspects of this were highlighted in the Royal Commission into Aged Care Quality and Safety Interim report (pp112-114, 166-183)

<sup>6</sup> Ibid p188

<sup>7</sup> Ibid p188