



WORKABILITY
Building Tomorrow's NDIS Workforce

**Response to the Queensland Productivity
Commission's 2020 draft report:
*The NDIS market in Queensland***

4 February 2021



Introduction

The WorkAbility Queensland Consortium (WorkAbility) welcomes the Queensland Productivity Commission's (QPC) draft report *The NDIS Market in Queensland* (the draft report) and acknowledges that learnings from its work are reflected in the report and recommendations.

We wish to highlight that a comprehensive report from the Jobs Queensland-funded National Disability Insurance Scheme (NDIS) Workforce Research Project, *Strengthening Queensland's NDIS Workforce* (the NDIS Workforce report), was completed by WorkAbility in 2020. While the report is in final draft form and yet to be released by the Queensland government, we recommend the QPC discuss the report detail and recommendations with Jobs Queensland as part of the evidence base for this inquiry.

The draft NDIS Workforce report aligns strongly with two sections of the draft report, with recommendations on traineeships and Allied Health Assistants.

Other draft recommendations from the research we bring to QPC's attention are:

- the importance of place-based approaches to skills and workforce development in the NDIS across Queensland's diverse regions
- the potential for a coordinated NDIS career promotion campaign linked to training pathways, employment services and job matching
- opportunities to improve our understanding of the NDIS workforce through capitalising on existing and new administrative data sets
- the range of areas where Queensland government may improve the accredited and non-accredited training for the NDIS workforce.

Some of these issues are further discussed in responses to specific aspects of the draft report below.

WorkAbility Queensland is a consortium of three organisations who have worked together since 2015 on strategic workforce policy, planning and development across Queensland to help ensure the National Disability Insurance Scheme is a success. The consortium members are National Disability Services (NDS), Community Services Industry Alliance (CSIA) and Queensland Council of Social Service (QCOSS).

WorkAbility Queensland aims to work collaboratively with the sector, government and the National Disability Insurance Agency (NDIA) to build the sector workforce supply and capability to meet demand under the NDIS.

Workforce data and intelligence developed aims to help build knowledge and skills, and enable organisations to effectively plan their workforce to meet the needs and demands of the sector into the future.

Market stewardship, skills gaps and the role of the Queensland government

WorkAbility offers comment on the statement that “the sector itself has the main responsibility for the development of the disability workforce” (p xxxiv).

As noted in the draft report, CSIA's June 2020 Workforce briefing¹ outlined the findings of CSIA-led research supported by Jobs Queensland. This research showed that disability sector employers are finding it hard to find enough workers to meet the needs of their existing and future NDIS participants. The demand is highest for client-facing roles (support workers, Allied Health Professionals, Plan Managers, Support Coordinators), administration staff and management. The finding is supported by a significant increase in NDIS-relevant job ads, which goes against the general downward trend across all industry sectors for job ads in the same period.

At the same time, over 20,000 new Yellow Card applications have been received since the start of NDIS rollout in Queensland, showing that many people are entering employment in disability services. That is, we see a significant increase in both demand and supply of workers in the NDIS, but many employers are still seeing workforce shortages. For some providers, the shortage of NDIS workers is a barrier to the growth of the NDIS market. The shortage causes delays for the delivery of services, particularly in regional and remote locations, and inhibits organisational growth.

The issue is not as simple as number of workers; the skills mix, availability and location of those workers are also critical elements.

WorkAbility believes that the key consideration is whether the regulatory and pricing framework supports *quality* work. We agree (as discussed below) that removing pricing caps is one way to help service providers be able to attract, retain and grow a quality workforce. That is, changing the regulatory framework will allow service providers to make local decisions that contribute to quality work. However, in a highly regulated market, the decision to change the regulatory framework does not sit with the employer or the industry.

To build on that example, the employer can make decisions around employment, but their ability to make sure they can access a skilled talent pool is limited. A clear role for government in a market stewardship sense is to ensure regulatory and policy settings that build that skilled talent pool. There are other stakeholders in the employment and training markets whose efforts and resources could be better directed to supporting growth and development of the NDIS workforce, and governments have a key role in supporting this to occur.

The workforce shortages are across more than just the NDIS workforce, and the levers to address those shortages sit primarily with governments. As a market steward, government has the power and the resources to address the issue in the medium term, bringing together stakeholders such as universities, training providers, primary health networks, allied health associations, employer and worker representatives and industry bodies.

WorkAbility notes the Queensland government's commitment to supporting the NDIS workforce through initiatives such as the NDIS Training and Skills Support Strategy funded by the Department of Employment, Small Business and Training. We recommend the final report take greater consideration of governments' (Queensland and Federal) role in developing the disability workforce alongside NDIS employers and other stakeholders.

¹ <https://csialtd.com.au/2020/07/08/industryworkforcebriefingjune2020/>

Comment on specific report sections

Draft Finding 7: The size of the disability support workforce has grown with the introduction of the NDIS. However, labour supply shortages remain for a number of occupations and areas. The NDIS regulatory framework, including for pricing, as well as broader training frameworks also likely affect the quantity and quality of the workforce.

WorkAbility supports this finding. Any reform of market settings needs to consider how they may impact on the quality of work and the ability to attract, skill and retain a quality workforce.

Many employers report that the current price settings do not support quality work. An expected flow on effect of removing price caps would be that service providers will be better able to offer attractive working conditions, competitive remuneration and professional development required to ensure a quality workforce for the NDIS.

WorkAbility further recommends that the Queensland government continue to work with the industry to deliver and improve both accredited and non-accredited training for the NDIS workforce.

Draft Recommendation 6: In order to improve the information available to the market to assist participants and providers in planning, the Queensland government should propose that the NDIA: ...work with stakeholders to determine and address ongoing data gaps...

WorkAbility supports the recommendation. In particular, it recommends the Queensland government also consider gaps in workforce data collection. Queensland government should also capitalise and build on its own data sources, for example Yellow Card data has provided useful insight into the volume and growth of this workforce, however there is much more information that is and could be collected through Yellow Card applications that would provide deeper insights into workforce demographics, for example age, gender, ethnicity, skill level, employer/s, etc. There may be other similar administrative data sources could be better utilised to understand the detail of NDIS workforce and skills. This would allow greater understanding of workforce and skills supply and demand, with strong flow-on benefits to workforce planning.

Draft Recommendation 12: The Queensland government should propose that the NDIS Quality and Safeguards Commission work closely with stakeholders such as the Aged Care Quality and Safety Commission and the Australian Commission on Safety and Quality in Health Care to streamline quality standards and introduce mutual recognition of professional qualifications across relevant sectors.

WorkAbility supports the recommendation, noting that work on harmonisation across these sectors also needs strong input from the coordinating departments, that is, the Department of Social Services and the Department of Health.

Draft Recommendation 13: The Queensland government should fund a pilot for Allied Health Assistant roles to better understand the role in the context of disability services, particularly in relation to delegation and supervision, and risk management.

WorkAbility strongly supports the recommendation. Greater use of Allied Health Assistants can help alleviate some of the shortage of allied health professionals and provide a pathway for support workers or new workers to the industry seeking to increase their skill levels. The pilot should be led and coordinated by industry.

Information request: The Commission is seeking further information on: ...other options for addressing workforce shortages, such as, customised traineeships, ways to increase employment of people with a disability in the sector, and ways to better 'market' the sector to prospective workers...

Customised traineeships

Traineeships have often been raised by our stakeholders as a way to support more people into the disability sector workforce, and bring both opportunities and challenges. Two key challenges exist for uptake of traineeships in the NDIS: many new NDIS workers commence as casuals, which are not eligible for traineeships under current policy settings; and NDIS support work occurs predominantly in people's homes under limited supervision, which may not meet the requirements for trainees to be directly supervised for the duration of their traineeship. WorkAbility believes that a hybrid model should be developed that provides for learning on-the-job with guaranteed shifts and amended supervision arrangements that support the learner to develop independence and also reflect the reality of NDIS work.

Coordinated sector promotion

Work in community services is historically undervalued, and the disability services sector is no exception. Despite this, many workers in the sector find the often-difficult work personally rewarding. While NDIS employers are using a range of recruitment strategies, such as employment agencies, forums, roadshows and informal networks, they would be boosted by a more strategic approach to showcasing the benefits of working in the disability sector. There is an opportunity for the Queensland government to partner with the community services industry to push for a coordinated national campaign to attract people to the disability services sector.

Addressing retention

Worker attrition rates in the disability sector are high, and it is generally recognised that contributing factors include low rates of pay, increasing casualisation and the demanding nature of the work. Addressing the factors that lead people to leave the sector would have a positive effect on workforce shortages. The proposal to remove price caps discussed above in this submission is one way. Working with industry to provide more stable conditions for workers would also support retention.

Information request: Aboriginal and Torres Strait Islander people and the NDIS

The reported experience of WorkAbility's workers supports Draft Finding 16:

- challenging to promote the NDIS to service providers when the framework does not have the flexibility to support culturally sensitive service provision
- building trust can be difficult when decision-making authority is held centrally rather than on the ground
- NDIS is competing with the Closing the Gap health program – people can get access to care and supports from a trusted and familiar provider through the CTG program.

WorkAbility supports a primary driver to shape reforms into the future being the Institute for Urban Indigenous Health's Indigenous NDIS Pilot Project of National Significance.