


13 May 2020

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

Dear Ms Allan

Please find attached our submission to the Joint Standing Committee on the National Disability Insurance Scheme Inquiry into the NDIS workforce.

Sincerely,



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Chief Executive Officer  
Catholic Social Services Australia

# **Submission to the NDIS Workforce Inquiry of the Joint Standing Committee on the National Disability Insurance Scheme**

**May 2020**

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## Introduction

Thank you for the opportunity to make a submission to the Joint Standing Committee on the National Disability Insurance Scheme's Inquiry into the NDIS Workforce. We acknowledge the significance and timeliness of this inquiry, as the NDIS workforce is set to face increasing demand and challenges. In light of the developing COVID-19 pandemic, the scope of our submission has changed significantly. Thus, we will highlight both current issues within the NDIS workforce, and emerging issues induced by the coronavirus crisis, before making recommendations based on potential scenarios post-pandemic.

Catholic Social Services Australia (CSSA) is the Catholic Church's national body for social services. Our organisation envisages a fairer, more inclusive Australian society that reflects and supports the dignity, equality and participation of all people. CSSA works alongside an extensive national network of social services providers to challenge, advocate and campaign for the development of just and compassionate social and economic policies that will improve the lives people who are poor and vulnerable in Australia.

The membership network of CSSA is made up of around 50 Catholic social welfare organisations across the country with more than half of our members delivering services to people with a disability. This submission reflects our member agencies' experiences with the NDIS, and their concerns with the workforce problems associated with meeting the growing demands of the scheme.

The social service ministry, and by extension, the NDIS, is integral to the mission of the Catholic Church in Australia. The Catholic Church, alongside other Christian Churches, have played an integral role in the development of social services policies in Australia. Furthermore, Catholic social teachings outline the importance of human dignity and the worth of each person. They also teach the importance of values such as subsidiarity, where decision making and responsibility should be as close as possible to those most affected by the decision, and solidarity, in which we recognise and celebrate the diversity of the human family and responsibility for one another. These teachings closely align with the fundamental aims of the NDIS and are integral to its workforce.

While committed to ensuring the success of the NDIS, CSSA and its members are very concerned about the ability of the workforce to cope with the rapidly increasing demand for its services. The NDIS workforce will need to employ a further 90,000 staff to meet the demands of the expected 480,000 participants when the scheme is fully implemented (DSS 2019, 1). Furthermore, CSSA is very concerned about the impact of COVID-19 on the NDIS workforce. It remains to be seen what impact COVID-19 will have on the NDIS

workforce, but it is likely that there will need to be some changes post-pandemic to ensure that the scheme fulfils its purpose of supporting all participants.

## Recommendations from this submission

CSSA recommends that a number of steps be taken to address the issues prevalent within the NDIS workforce and the increasing demand for its services. These include:

- Prioritising the development of a national workforce plan that includes an awareness raising campaign to attract and retain workers;
- Providing the opportunity to enhance skills development within the workforce;
- Re-examining the NDIS fee structure; and
- Supporting pathways to meaningful employment for willing NDIS participants.

## The National Disability Insurance Scheme

The NDIS is one of Australia's most significant public policy initiatives. It was established in 2013 on the basis of providing choice and control for people with a disability to access the support they need, when and where they need it. The scheme allows participants to access funding for any support needs related to their disability and to enable them "to participate in economic and social life" (NDIS 2013, 10). The NDIS is based on the principle of choice, in which participants select which providers support them, underlining the importance of self-determination and agency. The successful delivery of the NDIS is reliant upon a skilled, committed and caring workforce.

The NDIS legislation was developed within the scope of Australia's obligations under the United Nation's 2006 Convention of the Rights of Persons with Disabilities (CPRD). The CPRD outlined that its purpose was to "promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities" (UN 2006, 4). As a signatory of this convention, the Australian government has committed to "take all appropriate measures" to ensure that persons with disabilities are able to live without discrimination in Australia.

The *National Disability Insurance Scheme Act 2013* aims to “support the independence and social and economic participation of people with a disability” and to promote the provision of high quality and innovative supports that enable people with disabilities to maximise independent lifestyles and full inclusion in the community” (Office of Parliamentary Council 2013, 4). At the core of these objectives is enabling people with disabilities to live an independent life based on social and economic participation. This independent life includes the ability to access meaningful employment.

## Workforce issues now

The Department of Social Services has projected that there will be an expected 480,000 participants in the NDIS when the scheme is fully implemented in 2020. In order to meet the needs of these participants, the Department of Social Services (DSS) has estimated that the NDIS will need a further 90,000 staff (DSS 2019, 1). In 2019, the DSS found that the NDIS workforce consisted of approximately 100,000 full time equivalent staff (DSS 2019, 1).

A 2017 Costings Report by the Productivity Commission highlighted that during the transition period to full operation of the NDIS, 1 in 5 (net) jobs created in Australia will need to be in the disability sector (PC 2017, 319). The scale of this workforce growth dwarfs previous major national projects in Australia, placing the government in uncharted waters. For instance, the rollout of the National Broadband Network required a workforce increase of 25,000 staff and the Building the Education Revolution Program of 2007-2010 required 22,971 additional staff (DSS 2019, 1). The additional 90,000 staff required for the NDIS to meet its demand when fully rolled out this year poses a very substantial challenge.

In addition to increasing the NDIS workforce, there are a number of issues that exist within the workforce that need addressing. Firstly, staff within the disability sector do not receive remuneration that reflects the challenging and demanding nature of their work. The majority of disability support workers are paid a little over the minimum wage. In 2018, a study found that many NDIS staff experienced “difficulties earning enough to pay their bills” (MacDonald et al. 2018, 87). The casualisation of the sector also results in workers receiving less hours and unstable work. A workforce which does not feel adequately valued will struggle to effectively carry out its role and will experience difficulty in attracting new staff.

The decline of permanent, full-time employees and the growing casualisation of the workforce is another issue. From September 2015 to September 2017, the growth rate of casual workers in the disability workforce was 26% per year, compared to only 1.3% per year for the permanent workforce (NDS 2018, 7). In 2018, the NDIS workforce comprised of only 6% fixed staff and 10% permanent full-time employees,

compared to 38% permanent part-time and 46% casual staff (NDS 2018, 5). This is problematic as workforce stability is essential to meet current and future demands. Further, workforce instability can result in poorer outcomes for participants. Indeed, for many in the system, having established and reliable support workers is crucial to their care.

Studies have found that workers in the disability sector experience high levels of stress and burnout. This has been an ongoing issue that existed prior to the creation of the NDIS, and continues to this day. In 2011, the Productivity Commission found that stress and burnout, and the high “emotional and physical demands” placed on staff resulted in high staff turnover (Productivity Commission 2011, 703). In 2010, it was found that 13% of surveyed workers in the Australian disability sector listed “stress or burnout” as a reason for leaving their occupation (Martin and Healy 2010, 148). In 2017, the Curtin University conducted a study into the experiences of 12 disability support workers in Australia. They found that stress and burnout were a very common experience amongst these staff, and that these conditions led to workers experiencing difficulty in performing to their full potential (Judd et al. 2017, 1114-1115). Disability support workers clearly continue to face a demanding working environment, and it is imperative that these staff are better supported.

These issues in part explain the high staff turnover rate within the NDIS workforce. In June 2019, the quarterly turnover rate for permanent staff in the disability sector stood at 5%, with the rate for casual workers somewhat higher at 7% (NDS 2019, 58). This highlights the difficulty of retaining staff in the disability workforce. High turnover also leads to higher costs in recruiting new staff. This further cements the importance developing and promoting a sector in which its workforce feel valued and supported.

In the face of these findings, it is imperative that a national workforce plan is designed to meet the growing demand for workers in the disability support sector. Complacency and inadequate action on the development of a sustainable NDIS workforce will undermine the scheme and directly impact those it supports.

## Workforce in light of COVID-19

The COVID-19 pandemic has introduced significant challenges to the NDIS workforce. As the current situation is ongoing and developing it is difficult to determine the level of impact that this crisis will have on the workforce. That said, many of the issues discussed in the previous section are being magnified during the ongoing pandemic.

Casualisation of the NDIS workforce has reduced the stability of the sector. Due to the COVID-19 pandemic, casual workers are at greater risk of losing their jobs as has been witnessed in other sectors. Given that in 2018, the workforce comprised of 46% casual staff, a large proportion of the workforce is at risk. However, it is critical that NDIS participants continue to receive support care during this crisis. The sector's demand for an additional 90,000 staff to meet the needs of a fully implemented NDIS will be further challenged if workers are laid off during this pandemic.

### COVID-19 economic measures

The Australian Government has introduced a number of employment measures to soften the economic impact of the COVID-19 pandemic on the Australian economy. The most significant of these measures in the context of this submission is JobKeeper. The JobKeeper payment of \$1500 a fortnight is \$20 above minimum wage, which for many in the NDIS workforce is significantly greater than their current income (Cassells and Duncan 2020). We see two issues arising from JobKeeper that may have a bearing on the future NDIS workforce.

The NDIS has been particularly impacted by the cancellation of services during the COVID-19 pandemic. The "fee for service" model operating across large parts of the NDIS leaves employers little capacity to continue to pay employees when demand for services falls. While the Australian Government's announcement on 21 March on changes to the NDIS were welcome, access to JobKeeper is, for many employers, critical to the maintenance of their NDIS workforce. However the construction of the current NDIS workforce complicates the accessibility to JobKeeper, and for some employees, access to JobSeeker.

The JobKeeper Payment is designed to help businesses affected by the Coronavirus to cover the costs of their employees' wages, so that more employees can retain their job and continue to earn an income. It has been described as an employer attachment payment. Casual employees are only eligible if they were employed by an eligible entity on a regular and systematic basis for at least 12 months at 1 March 2020. The eligibility requirement for casual employees, is problematic given the high level of casuals employed within the NDIS. In the short-term there will be many casuals who will no longer be attached to the NDIS because of their ineligibility to qualify for JobKeeper, which in our view will be problematic for the future NDIS workforce. Conversely, a number of employees will receive more income because of their eligibility to JobKeeper. The difficulty for the sector will be the financial impact the withdrawal of JobKeeper will have on these individuals and the consequences of this on the employee's decision to remain within the sector.



## Access to Personal Protective Equipment

The NDIS workforce has limited access to access to Personal Protective Equipment (PPE) due to the extraordinarily high demand in the current situation. Hospitals are struggling with the limited supply of PPE, with medical staff reportedly having to reuse facemasks (Knaus 2020). The CEO of the NDS, David Moody, on 9 April 2020 stated that NDIS support workers were struggling to access protective equipment (Truu 2020). He noted that without adequate access to PPE, the challenge of “ensuring that there will be sufficient workers to actually support people with a disability during the pandemic” is raised (Truu 2020). The concern about contracting COVID-19 has seen an increase in staff cancelling their shifts. A further increase in cancellations will test the system’s ability to deliver vital services, especially if there is a COVID-19 cluster within an entity or facility with NDIS participants.

The outbreak of the COVID-19 pandemic has posed a number of new challenges for the NDIS workforce, as well as exacerbating the issues that previously existed within the workforce.

## Scenarios for the NDIS workforce post-pandemic

It is still unclear what impact and challenges the current pandemic will present to the NDIS and its workforce once the health challenges have been mitigated. If the situation returns to ‘normal,’ and the NDIS sector emerges relatively unscathed, the critical issues, pre-COVID-19, facing the workforce will need to be addressed. However, if there is a significant change to the disability sector following the abatement of the pandemic, there will be many new and potentially more serious challenges facing the workforce that will require system-wide reforms. In the following section, we will consider two different post-pandemic scenarios, and their respective workforce issues.

### A return to Pre COVID-19 conditions

If the disability sector emerges from the COVID-19 pandemic relatively unchanged, there are a number of important issues that will need to be addressed. As discussed previously, these include insufficient remuneration for staff, increasing casualisation of the workforce and the demand for 90,000 additional staff by 2020. Further, the implications of the application of JobKeeper on the sector may see a decline in the number of casual employees willing to work in the sector, especially should other employment opportunities present themselves during the economic recovery period.

CSSA believes that a national workforce plan should be established by the Australian Government to address these issues. Furthermore, CSSA recommends the national workforce plan include a focus on the development of stronger employment pathways for willing NDIS participants to gain meaningful, paid employment within the NDIS itself.

### 1.1 National Workforce Plan

It is imperative that a national workforce plan is established for the NDIS to meet the projected demand for workers in the system. CSSA believes that this workforce plan should be underpinned by innovative strategies that attract new workers to the sector and enhance the development and retention of existing staff.

Firstly, the NDIS requires a workforce plan that promotes the importance and value of the sector. A public campaign that highlights the importance of working in the sector is necessary. This needs to showcase the life changing difference that disability support workers experience. It is essential that the NDIS workforce is built around staff who are passionate about the industry, and thrive in an environment where they show compassion and care towards those they support. A public awareness campaign that showcases the rewarding nature of the industry and the importance and value of the sector will be a step in the right direction towards developing a workforce pipeline.

In the 2018-19 financial year, the Australian government spent a total of \$140 million on advertising across its departments and agencies (Department of Finance 2019, 12). The Department of Defence dominated, spending \$30 million on recruitment advertising (Department of Finance 2019, 11). Australian Defence Force recruitment has received a total of \$157.6 million over the last 5 years. It is CSSA's position that strengthening the NDIS workforce pipeline will require a similarly significant financial investment by the Australian government to create a prominent public campaign to attract new staff to the disability sector.

As well as attracting new staff to the expanding NDIS workforce, it is also important to focus on retaining staff. As outlined previously, the quarterly turnover rate for permanent staff in the disability sector in 2019 was 5%, with the rate for casual turnover at 7% (NDS 2019, 58). Factors such as high levels of stress and burnout, and relatively low levels of remuneration contribute to this. To address staff retention it is essential that staff are well managed and supervised. Greater focus needs to be placed on the training and development of staff. More training and development opportunities need to be provided to the workforce so that their skills and knowledge are regularly refreshed. In order to facilitate greater training and

professional development, the fee structure for the NDIS needs to be revamped to enable providers to offer employees access to more professional development opportunities.

Whilst skills and knowledge are critical to the delivery of NDIS services, values such as empathy and compassion, and a commitment to making a better life for other people is also incredibly important. It is essential therefore that the remuneration levels within NDIS are sufficient to attract employees with the right skills and values as well as retain and reward those also already working in the NDIS.

A national workforce plan requires quality and innovation to continually refresh the system. It is not simply enough to create a workforce pipeline. It is imperative to encourage and invite innovation in order to stimulate the ongoing development of the NDIS workforce, and avoid stagnation. This could be achieved by using new technology to address challenges faced by staff. For example, using technology to deal with administration provides support workers the ability to focus more on the care and support of participants, resulting in greater outcomes for both the workforce and those the NDIS supports. A survey in 2018 found that only 46% of organisations providing services in the Australian disability sector believed that their “information & service delivery system(s) work well for our staff and management” (Infoxchange 2018, 10). This was well below the national average of 54% (*Ibid*, 10). This highlights that significant improvement needs to be made in quality and innovation to refresh the use of technology within the NDIS workforce.

The Committee has already heard concerns raised about the NDIS fee structure and the impediments in both the price and design in securing continuity of service to participants. Workforce development and retention at provider level can only be achieved through a pricing structure which incentivises the development and retention of staff. The current system does not. Further, governments must also look at the disability sector as an industry and develop policies which will support a whole of sector approach to developing a pipeline of employees that are willing and capable of serving NDIS participants now and into the future. That investment must be more than simply providing education pathways. It must include the funding of a workforce campaign.

## 1.2 Disability Employment Pathways

CSSA believes that it is imperative to create pathways to meaningful employment for people with a disability willing and capable of working in the sector. Whilst the NDIS provides crucial support to Australians with a disability, it also has the ability to provide willing participants an opportunity to gain meaningful employment.

There are significant barriers to employment that exist for NDIS participants. Employers often consider it “too difficult” to employ those with a disability, and when they do, they are often limited to “menial work”

(NDIS 2019c, 8). Furthermore, even when they secure work, people with disabilities are often underemployed, with limited working hours (NDIS 2019c, 8). The OECD has found that people with a disability in Australia experience twice the risk of poverty than those without a disability (OECD 2017, 32). Significant action needs to be taken to drastically improve this disparity.

The aforementioned UN Convention on the Rights of Persons with Disabilities, on which the NDIS itself was based, emphasises the importance of employment for those with a disability. Article 27 of the convention recognises “the right of persons with disabilities to work, on an equal basis with others” (UN 2006, 19). This includes the right to the opportunity to gain a living by work freely chosen or accepted in a labour market and work environment that is open, inclusive and accessible to persons with disabilities” (UN, 2006, 19). Furthermore, the Convention states that “state parties” shall safeguard and promote the realisation of the right to work...by taking appropriate steps, including through legislation” (UN 2006, 19).

In 2019, of the 300,000 Australians participating in the NDIS, 170,000 were between the ages of 15 and 64 years, and thus classed as of working age. Of this group, only 24% were employed in paid work (NDIS 2019c, 7). However, 31% of participants have a work related goal in their plan (NDIS 2019c, 7). Thus, participants seeking work are subject to an unemployment rate of 23%, compared to the Australian average in 2019 of 5.3% (Naufal 2019). The Australia Government’s new strategy aims to reach a target of 30% of working age NDIS participants employed in paid work by June 2023 (NDIS 2019c, 12). Whilst CSSA supports the Government in increasing opportunities for disability employment, these efforts must not be tokenistic. A sophisticated approach is required that identifies opportunities for participants to gain experience and skills to further their life and career ambitions.

There are widespread benefits in increasing the employment of NDIS participants, for both employers and employees. For those with a disability, employment can provide them with a greater sense of identity and independence, and have positive health benefits. Furthermore, it can give them an increased income, resulting in greater financial independence and better living standards. In turn, this can reduce demand on welfare and support systems.

Likewise, employing those with a disability can also benefit business and organisations, by providing them with a diverse variety of skills, experiences and qualifications. Studies have found that people with a disability are just as, if not more productive than their counterparts without a disability. Australian research highlights that 86% of workers with a disability have average or superior attendance records, with 90% displaying equal or superior productivity rates than their colleagues without a disability (Graffam et al. 2002, 251).

Ultimately if the NDIS workforce emerges from the COVID-19 pandemic relatively unchanged, a focused national workforce plan that aims to both attract and retain workers is essential for the NDIS to meet the demands for an estimated 90,000 additional staff. Furthermore, quality and innovation are required to continually refresh the system and ensure that it remains up to date so that the workforce can provide essential support to all NDIS participants. In addition, increased support is required to ensure that all willing NDIS participants can access pathways to meaningful, paid employment, which will provide longstanding benefits for themselves and for their employees.

### Disruption to the NDIS Post COVID 19

If the COVID-19 pandemic damages the capacity of the NDIS sector to support its 480,000 participants then further efforts might be required to rebuild workforce capability within the NDIS.

Prior to the pandemic, the NDIS workforce required an additional 90,000 staff to meet the expected demands of the scheme when it was fully rolled out in 2020. High casualisation of the workforce, may see many disability support staff retrenched during the COVID-19 crisis. The Australian government will be required to implement systemic reforms in order to rejuvenate the workforce back to its pre-pandemic capacity, and boost it to the level required to support all the participants of the NDIS.

A recent Grattan Institute report suggests the unemployment rate in Australia could rise to between 10 and 15 per cent (Coates et al. 2020, 3). With levels of unemployment not seen since the last recession it may appear counter-intuitive to suggest that there is increased urgency in developing and executing a strong awareness raising campaign to attract and retain employees in the disability sector. The nature of this economic shock is materially different to that which occurred during Global Financial Crisis (GFC). It is our hope that governments will be reluctant to pursue austerity measures as many did during the GFC, instead looking to stimulate the economy to deliver faster economic recovery and limit the prospects of high and sustained levels of unemployment. If that is the case then those employees who have left the sector will likely pursue other employment opportunities.

Positioning the disability sector as an employer of choice needs to begin before the recovery of the rest of the economy. That is why CSSA is recommending that preparations for a strong awareness raising campaign to attract and retain employees in the disability sector should be done as matter of priority.

## Conclusion

This submission seeks to highlight the challenges facing the NDIS workforce and presents a number of recommendations to address these issues. In light of the COVID-19 pandemic, the challenges of attracting and retaining staff may be exacerbated and amplified. That is why CSSA is recommending the prioritisation of a national workforce plan that focusses on attracting new staff to the sector and retaining current staff. A strong advertising campaign to raise awareness for the sector is essential to expand the workforce. Furthermore, CSSA recommends that the NDIS provide greater opportunity to enhance skills development within the workforce. The impact of the ongoing COVID-19 pandemic may prompt a re-examination of the sector and its workforce. A key area for re-examination is the fee structure of the NDIS sector. Finally, CSSA recommends that greater support is provided for pathways to meaningful employment for willing NDIS participants.

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