

Ms Bonnie Allan
Committee Secretary
Joint Standing Committee on the NDIS
PO Box 6100
Parliament House
Canberra ACT 2600

Via email: NDIS.Sen@aph.gov.au

Dear Ms Allan

Response to Questions on Notice & Further Information

1. Your submission highlights the Needs Analysis which found that workforce shortages are emerging. What will be the impact of workforce shortages?

The impact of persistent workforce shortages will lead to outcomes including:

- *The needs of the most vulnerable and disadvantaged in our community will not be met*
- *Insufficient childcare places available to meet need and support participation of parents in the workforce*
- *A growth in unpaid carers, particularly among disadvantaged groups*
- *Increased levels of poverty among Australians who face disadvantage including women, single parents, people with disability and older Australians.*

2. Is the impact of workforce shortages heightened during COVID-19?

There have been different experiences across the sector:

- *There has been a decrease in the number of volunteers during COVID-19 leading to an increased reliance upon paid workers. This has led to some workforce shortages*
- *Recruitment of staff for COVID-19 specific projects has been difficult due to the short-term nature of associated contracts particularly for roles that require staff with professional qualifications*
- *Demand has increased across some services but due to funding limitations, organisations have not been able to recruit additional staff to meet need.*

- *Where there have been staff shortages, some organisations have been able to redeploy staff from non-essential areas. However, that means that some non-essential – albeit highly valuable – work (e.g. long-term project work / training / capacity building / internal improvements / research) has been delayed.*
 - *The ACT has not had high numbers of COVID-19 cases and has been less affected by staff shortages as a result of self-isolation requirements*
 - *There is concern about the wellbeing of the community sector workforce following back-to-back crises in the ACT including nearby bushfires, bushfire smoke in Canberra, hailstones and then COVID-19.*
3. Did the Needs Analysis identify any areas that the Federal Government could address? If so, what are they?
- *Implement procurement and pricing that enables clear demonstration and assessment of the true cost of service delivery, **including workforce attraction, retention and development***
 - *Provide long-term funding as the default as far as possible, subject to sensible risk management*
 - *Ensuring NDIS pricing and/or other mechanisms provides professional development for staff, for example a portable training entitlement.*

The Federal Government must also ensure the continuation of the Commonwealth Government's ERO supplementation.

4. To what extent has the disability sector been an area of rapid growth in the ACT? Can this be quantified?

The State of the Disability Sector Report 2019 found that, nationally, 62% of responding organisations found it difficult to recruit disability support workers (up from 42% in 2017); and over 79% said that recruiting allied health workers (e.g. psychologists, physiotherapists, speech therapists, occupational therapists) was extremely or moderately difficult¹.

¹ National Disability Services, *State of the Disability Sector Report for 2019*, November 2019, p. 55, viewed 03 September 2020, <
<https://www.nds.org.au/news/state-of-the-disability-sector-report-2019-released>>

In 2016, the National Disability Insurance Agency estimated that the ACT required an additional 1000-1500 workers to meet demand under the full implementation of the NDIS.

There is likely to be an increased competition for aged care and disability workers in the future, as both NDIS providers and aged care residential services employ significant numbers of these workers and both sub-sectors are expected to experience a high growth in the number of these positions over time.

The ACT Community Services Industry Workforce Data and Community Needs Analysis found that the age cohort 75-84 will increase the most rapidly of all age groups. The correlation between age and disability means that the need for assistance will grow significantly. The growth in the number of older persons and resultant increase in the need for assistance with core activities will likely lead to a workforce increase of:

- NDIS – 50 percent between 2016 and 2026
- Transition Care – 38 percent between 2018 and 2026
- Home Care Services – 37 percent between 2018-2026
- Commonwealth Home Support Program – 36 percent between 2018 and 2026
- Aged Care Residential – 31 percent between 2019 and 2026.

More detail is available in the April 2019 [Report on the Projected Future Workforce Needs of the ACT Community Services Industry – Workforce Data and Community Needs Assessment – Attachment C.](#)

5. **“Dr MARTIN:** With regard to the administrative parts of being a provider in general and the feedback that you have received from those that are currently using the service. What sort of feedback or suggestions have you received about how that might be addressed in terms of the administrative burden?

Dr CAMPBELL: I'm happy to take that question on notice. Because ACTCOSS are a state and territory organisation, we're not as involved in issues beyond the workforce issue because that also has links to state and territory policy. I'm happy to go and reach out to some of our members to get some feedback on the more general administrative burdens related to the NDIS and provide that to you.

Dr MARTIN: That would be great. I have no further questions.”

From the Aged Care, Disability, and Carer Advocacy Service (ADACAS) ACT:

a) The complexity of the NDIS itself and the pace of change to the scheme means NDIS providers must build in administrative capacity to track and understand changes to the NDIS and implications for them and their clients. Additionally - the staffing cap on the NDIA, changes post scheme commencement with the role of the LACs, and delays with NDIS reviews/changes, all have had impacts for both participants and providers. The David Tune Review and Participant Service Guarantee introduce timeframes for responses for participants.

b) An additional example of impact for participants and agencies: the original intent of Service Agreements was to empower people with a disability to set the terms for what is important to them, instead many organisations have a long document with jargon and legalese which is particularly challenging for clients with cognitive or intellectual disability. If clients have multiple disability providers, and each usually asks for a service agreement, this contributes to the administrative burden on NDIS providers (and affects participant rights). A rethinking of the intent of the Service Agreement structure (in what situations they are needed, and when needed, for example a requirement that they be through shorter plain language or easy English options to simplify the process would help tremendously – so people are not getting multiple pages of documents to employ a cleaner for example.)

c) There is an ongoing administrative burden as a result of recruitment and retention challenges. In the disability sector, agencies who employ disability support workers tell us they experience difficulties in recruiting and retaining staff - they advise that staff report that wages are low, and hours can be uncertain. They can also experience challenges in achieving a good match between a support worker and client - and if the match is right/ the work isn't what the staff member is seeking, they leave - which means that the agencies can experience further costs in recruiting and training staff.

From Advocacy for Inclusion (AFI):

*a) The aged care and disability care workforces often overlap, with –
“the issue of ‘thin markets’ requires monitoring, increasing the quality and safeguarding and transparency to allow providers and participants to have increased capacity. The lack of capacity of NDIA staff is becoming extremely*

*problematic, particularly as more participants enter the Scheme. The NDIA staffing cap has been a notable criticism as to whether capacity and current resources allow for the NDIA to address the issue of 'thin markets' effectively across a number of issues. The management of the issue needs to be balanced while ensuring that providers and specialists have support to deliver the support required under the NDIS without additional and unnecessary constraint."*²

6. **Dr CAMPBELL:** Yes, the ACT government launched the industry strategy in 2016. Under that strategy, there is a specific project that looks at workforce, because we understand that workforce is really key to the success of the community services industry. As part of that workforce project, there are a number of tools and outputs that have been delivered, including support for the community sector to better recruit and retain staff. We also did a major review of workforce in the ACT, including data and also what the future needs of the ACT would be to help guide future work from the ACT government and the community services sector. We're happy to share that with the committee."

Tools & Resources:

- [Emerging Leaders' Framework](#)
- [Guide to Onboarding](#)
- [Guide to Supervision](#)
- [Guide to Peer Support Coaching & Mentoring](#)
- [Supplementary Guide to Probation](#)
- [Supplementary Guide to Performance Appraisal](#)

Workforce Data:

- [Workforce Data and Community Needs Analysis](#)
- [Workforce Data and Community Needs Analysis - Attachment A \(Appendix 1, 2, 3\)](#)
- [Workforce Data and Community Needs Analysis - Attachment B](#)

² Advocacy for Inclusion, *Response to Discussion Paper: Improving the NDIS Experience Establishing a Participant Service Guarantee and removing legislative red tape*, October 2019, p. 42, viewed 03 September 2020, <<https://engage.dss.gov.au/wp-content/uploads/2019/11/Advocacy-for-Inclusion-1.pdf>>

- [Workforce Data and Community Needs Analysis - Attachment C](#)
- [Workforce Data and Community Needs Analysis - Attachment D](#)

Note that the Workforce Data and Community Needs Analysis report is still Under Consideration by some members of the ACT Joint Community Government Reference Group. However, it is available on the ACTCOSS website as listed above.

Please do not hesitate to contact me if you require further information on the ACT disability and broader community services sector.

Yours sincerely



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Chief Executive Officer

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11 September 2020