

**Submission
No 22**

OPTIONS FOR ESSENTIAL WORKER HOUSING IN NEW SOUTH WALES

Organisation: National Disability Services

Date Received: 10 September 2024

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Inquiry into options for
Essential Worker Housing in
New South Wales.

Submission

About this submission

National Disability Services (NDS) welcomes the opportunity to provide a submission to the Inquiry into options for essential worker housing in New South Wales. We advocate for a wide range of policy priorities on behalf of the disability sector, across National Disability Insurance Scheme (NDIS) services, pricing and payment reform, workforce development, employment of people with disability, regulatory reform, improved planning, and support pathways, supports for people with disability outside the NDIS, home and living supports, and supports for children, young people, and families. We are grateful to the Legislative Assembly Select Committee for the opportunity to provide a submission.

In summary:

NDS recommends that disability workers, allied health practitioners and behaviour support practitioners are included in the definition of essential workers and are prioritised as a cohort for essential worker housing in regional and remote areas of NSW.

- These professionals meet the Australian Government's criteria for essential workers,
- Their role was recognised as critical during the COVID-19 pandemic,
- And disability support services are defined as essential in current NSW programs.
- Additionally, the increasing demand for frontline roles in remote and rural areas further underscores the necessity of including these professionals in the essential worker definition.

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About National Disability Services

National Disability Services (NDS) is the peak body in NSW and Australia for non-government disability service providers. NDS has more than 433 members who operate in NSW and over 1,100 members nationally. Collectively, NDS members operate several thousand services for Australians with all types of disability. Our members employ around 100,000 people and provide a full range of disability services, including disability support work, allied health, and behaviour support, to some 500,000 people with disability. The NDS platform of National Disability Practitioners has over 15,000 individual members across all aspects of the disability workforce.

Our **vision** is for an inclusive Australia where all people with disability live safely and equitably. To achieve this, people with disability need to access the right supports, at the right time, from the right people, services, and systems.

NDS acknowledges the traditional custodians of the lands, seas, skies, and waterways throughout NSW. We pay respect to elders past and present and recognise their deep and continuing connections with our shared country, culture, and community.

Introduction

Over 18% of the New South Wales (NSW) community [live with disabilities](#). This equates to 1.37 million people living with disability in NSW. People with disability are a diverse community. They vary in age, gender, gender identity, race or cultural background, family environment, socioeconomic circumstance, geographic location, and the nature of their disability. People experience a range of impacts due to disability, with [over 6% of the population experiencing profound or severe disability](#).

The National Disability Insurance Scheme (NDIS) supports 196,870 people in NSW as of June 2024, including 13,495 (6%) participants who identified as Aboriginal or Torres Strait Islander and 15,366 (7%) who identified as culturally or linguistically diverse. The NDIS supports people with permanent impairment (physical, intellectual, cognitive, neurological, visual, hearing, or psychosocial) resulting in significant disability, and typically provides support to individuals between the ages of 0 to 65.

The disability sector is one of the largest and fastest growing sectors in Australia, which has been driven significantly by the NDIS. This submission reflects the workforce shortage for both NDIS funded supports for people with disability and the supports for people with disability outside the NDIS. The [National Disability Reform Agenda](#) is currently designing and planning for foundational supports to support people with disability who have needs greater than the mainstream system can provide and outside of the NDIS. All governments recognise the importance of mainstream services in supporting the outcomes of this reform agenda which are:

- People with disability achieve economic participation and social inclusion.
- People with disability enjoy choice, wellbeing, and the opportunity to live as

independently as possible.

- Families and carers are well supported.

Foundational supports are still yet to be designed and implemented across state and federal government, and this is anticipated to identify additional disability workforce demand. The design of foundational supports in Australia's care and support economy will be critical. The care and support economy is one of Australia's biggest industries and largest employers spanning the provision of paid care and support across aged care, disability support, veterans' care and early childhood education and care.

The NDIS supports people with disability to access core supports which support a participant to complete their daily living activities; capacity building supports which supports an individual to build their independence and skills; and capital supports which are an investment in support (i.e. support to access equipment for mobility, assistive technologies for communication, or modifications to enable accessibility of a home).

The NDIS workforce delivers supports and services which are critical not only to people with disability, but their families and carers. The support provided by each type of frontline worker is provided below:

- As defined by the Social, Community Home Care and Disability Services Award, **disability support workers** provide critical core and capacity building supports to people with disability, including social and community support, support to access mainstream services such as healthcare, home care services, domestic and personal support, and crisis assistance.
- As defined by the Australian Health Practitioner Regulation Agency, **allied health professionals** (speech pathologists, occupational therapists, dieticians, physiotherapists) provide a broad range of diagnostic, technical therapeutic and direct health services to improve the health and wellbeing of the participants they support. These practitioners are university qualified with specialised expertise in preventing, diagnosing, and treating a range of conditions and illnesses, and work within a multidisciplinary team to provide specialised supports for different participant needs.
- As defined by Behaviour Support Practitioners Australia, **behaviour support practitioners** assess the influences on a person's behaviour and design interventions to both increase a person's quality of life and reduce challenging behaviours. Practitioners are engaged across disability and community services, home environments and school settings.

The NDIS has already created a considerable number of new jobs and is expected to

continue to do so across NSW and the rest of Australia. Many of these jobs will be created in regional and remote areas. This was recognised back in 2015 [in NSW, the NDIS was forecast to:](#)

- Support between 7,800 and 12,400 people with disability to find work.
- Support approximately 10,700 carers to return to the workforce.
- Create an employment boom in NSW with 37,400 – 46,500 jobs created as a consequence.
- Create approximately 25,000 jobs in the NSW disability service sector.
- Add up to \$7.3B annually to NSW's Gross State Product

Workforce Shortages

In the [NDIS National Workforce Plan: 2021-2025](#) it was identified that Australia needs to build a responsive and capable disability workforce, comprising primarily of disability support workers, nurses, and allied health professionals, projecting that by 2024 around 500,000 participants will require support from almost 353,000 workers.

Frontline workers form the majority of the NDIS workforce. In 2020:

- 66% of workers are home based disability support worker.
- 23.7% of workers are community-based support worker.
- 7.4% of workers are allied health practitioners and behaviour support practitioners.
- 3% other

Across New South Wales (NSW) there is unmet need for frontline disability staff. The [NDS State of the Sector Report in 2023](#) found that 82% of disability organisations received requests for services they could not provide with the reasons being:

- 45% did not have enough staff.
- 21% did not have staff that were properly trained to provide support.
- 15% of organisations lacked capacity or funds.

In the same NDS report, across the disability workforce, organisations in NSW recorded that there has been extreme or moderate difficulty to recruit staff across the disability workforce including:

- 81% struggled to recruit disability support workers.
- An extreme difficulty of 98% to recruit Occupational Therapists
- 89% to recruit Psychologists

- 91% to recruit Speech Therapists

NDS's annual Workforce Census survey collects data annually from national and state and territory level, for disability support workers and allied health workers providing insights on a variety of issues crucial to developing the disability sector. In the [2024 NDS Workforce Census](#), there was a considerable change in the proportion of employees who work full time growing by 10 percentage points from 20 per cent in 2022, to 30 percent of staff in 2024. This was largely driven by changes in New South Wales with the percentage of full-time employees almost doubling from 20 percent in 2022 to 39 per cent in 2023. The notable difference in New South Wales may be due to increasing costs of rents in New South Wales.

Nationally, the health care and assistance sector is experiencing extraordinary growth, with few signs that this will reduce in coming years. It is estimated that Health Care and Social Assistance is the largest employing industry in Australia. [Around 15.7 per cent of workers have their main job in this industry](#), and as recorded in the [Care and Support Economy State of Play](#) as one of the fastest growing parts of the Australian economy, the projected government investment is \$124 billion between 2027-28 to meet the expected workforce increase of 1 million by 2049-50.

[NDS's Submission to Employment White Paper](#) calls for a multifaceted, national, sustainable approach to the disability workforce, and the care and healthcare workforce more generally, is critical to ensure that people with disability receive the support they need. The sustainable approach is also needed to support the growth in demand for care services in the years to come. Recognition of the critical and essential role that frontline disability workers contribute to the sector, and the economy more broadly is paramount to support meeting workforce demands.

Response to the Terms of Reference

- 1. Establishing an appropriate definition for essential worker housing for the NSW Government to adopt including criteria for prioritising worker cohorts and geographical areas.**

NDS provides the following responses to the Terms of Reference based on the experience of disability providers providing services in NSW, recommending that disability support workers, allied health professionals and behaviour support practitioners are included in the definition of an essential worker in NSW because:

- They meet the Australian Government criteria of an essential worker (see below)
- Frontline disability workforce was considered essential during the COVID-19 pandemic
- Disability Support is included in the definition of essential for a number of NSW programs

- There is a growing need for frontline roles in regional, remote and rural NSW

Criteria for an Essential Worker

A person is an essential worker by the [Department of Social Services](#) if they have 'specific skills, or are involved in the product of goods or the delivery of services where the skills, goods or services are essential in responding to an emergency.'

In New South Wales, there a number of existing programs including 'make the move' that define an [essential worker](#) as any employee of disability support industry.

NDS recommends that the definition of essential workers in NSW of disability support industries is inclusive of disability support workers, allied health practitioners and behaviour support practitioners.

Essential workers in regional communities

It should be noted, as part of the Employment Support for Essential Workers Partners, [the Welcome Experience](#) is available to support partners of essential workers in regional communities. The definition for essential workers in this context includes disability support and aged care, showcasing the importance of these professions in the regional, remote, and rural communities in NSW.

This reflects the critical nature of frontline workers in a person-centered industry including disability support workers, allied health professionals and behaviour support practitioners who are key to the safety, wellbeing, and support of participants in emergency situations.

Allied health practitioners and behaviour support practitioners spend significant portions of their support establishing strategies for day-to-day wellbeing, participant and community safety, and incident management plans. Disability support workers are key at implementing these plans, and ensuring the day to day needs of people with disability are met in their home, and in the community.

The delivery of these services by these professionals are critical in responding to an emergency and this was clearly identified during the COVID-19 pandemic.

[NDS published a submission](#) responding to the NDIS participant experience in rural, regional and remote Australia, proposing a number of strategies and funding mechanisms for workforce development noting that: *"a holistic sector strategy must also give precedence to tackling housing and accommodation challenges for workers, a notable obstacle hindering workforce development and limiting provider choices, as highlighted by our members across various regional areas. In addressing concerns related to rural and remote areas, NDS' submission recommends a NDIS Remote Worker Housing Strategy, to cover the costs of worker travel to locations where suitable and affordable accommodation is scarce. Additionally, key worker schemes for housing, ensuring the inclusion of disability workers, and providing support for Allied Health roles*

in regional and remote areas through initiatives like regional universities, housing programs, the use of allied health assistants (AHAs), and incentives are recommended to enhance workforce conditions in these areas."

Criteria for an Essential Worker during COVID-19 pandemic

During the pandemic, the [National Cabinet issued interim guidance](#), changing isolation requirements for essential workers including workers providing support to people with disability and vulnerable people to ensure continuity of essential services were maintained. This is consistent with the Department of Social Services definition of an essential worker.

Post pandemic, the [COVID-19 Response Inquiry roundtable summary of people with disability](#) noted 'disability support workers and carers are essential workers and many people with disability rely on them to survive' due to the individualised support required by people with disability for day to day support, and a heightened level of support is provided during an emergency. The Inquiry found that 'pandemic revealed a lack of knowledge and experience regarding disability within the Australian Government and an understanding of their health risks in a pandemic.'

Moving forward, to 'improve preparedness for a future health emergency' the Inquiry recommended that the person or NDIS provided 'has fundamental capability in supporting access to health services' including support workers and allied health professionals.

Role of frontline staff in preventing violence, abuse, and neglect of people with disability

Quality care is a human right and an essential service.

[The Royal Commission into violence, abuse, neglect, and exploitation of people with disability](#) has shown that:

'people with a disability continue to experience high rates of violence and abuse, multiple forms of neglect, and sexual and financial exploitation... [and] based on their disability, people with disability continue to be excluded from participating in many areas of life.'

People with disability across Australia rely on critical support from frontline staff to participate in the community, including support from disability support workers, allied health practitioners and behaviour support practitioners.

[Frontline paid staff](#) have consistently been the main reporters about adults with disability, accounting for 60% of reports made to the Ageing and Disability commission. 17% of these reports are made by current or paid workers, demonstrating the critical role these individuals play in ensuring the safety of people with disability.

Growing demand for frontline workforce

In 2023, a major report was published following a review of the 10-year-old NDIS (National Disability Insurance Scheme). This report outlined 26 recommendations with 139 actions to change the system - [NDIS Review recommendations and actions](#).

As a critical provider of day-to-day support for people with disability, the NDIS review explored the role of disability support workers. The findings from this review were that the disability sector needs 'a larger, more skilled workforce that can meet the future demand for quality services and improved outcomes.'

Recommendation 15 is to attract, retain and train a workforce that is responsive to participant needs and delivers quality supports.

- Action 15.1: The Australian Government should design and trial workforce attraction and retention initiatives.
- Action 15.2 The Australian Government should develop targeted and flexible migration pathways for care and support workers.
- Action 15.3: The Australian Government should develop an integrated approach to workforce development for the care and support sector.

Solutions proposed included targeted strategies to increase the allied health workforce and disability support workers with a consideration that 'First Nations communities and remote communities also need a more localised workforce' to ensure continuity of support.

Rural and remote barriers are significant. The tyranny of distance and isolation for people with disability. Individuals often have barriers of access to transport whether it is personal or public transport. Additionally, the digital divide compounds the difficulties with often limited access to technology e.g. no funds on phone, no access to internet, lack of mobile reception. Service providers are challenged with these barriers in arranging meetings with families. General workforce shortages are compounded in rural and remote settings with lack of appropriate staff to undertake checks and large distances to travel to service need face-to-face appointments.

[The Royal Commission in 2023 specifically noted](#), the 'shortage of suitably qualified and experienced positive behaviour support practitioners, particularly in rural and remote areas, is a key concern and a major contributing factor to problems with positive behaviour support plans.'

NDS recommends priority worker housing is provided to frontline staff in regional, rural and remote areas of NSW, where access to frontline services is limited and demand for these services is high.

Concluding Comments

This inquiry provides an important opportunity to establish an appropriate definition for essential worker housing and prioritise worker cohorts and geographical areas to meet the needs of the NSW community.

In conclusion, NDS asserts that disability support workers, allied health professionals and behaviour support practitioners should be defined as essential workers in NSW based on:

- These professionals meet the Australian Government's criteria for essential workers,
- Their role was recognised as critical during the COVID-19 pandemic,
- Disability support services are defined as essential in existing programs.
- Additionally, the increasing demand for frontline roles in remote and rural areas further underscores the necessity of including these professionals in the essential worker definition.

As a peak body with expertise at a national and NSW level, NDS brings its experience and provider engagement to detailing its recommendations contained in this submission.