







VCOSS submission to VET Disability Education Delivery

October 2020

The Victorian Council of Social Service is the peak body of the social and community sector in Victoria.

VCOSS members reflect the diversity of the sector and include large charities, peak organisations, small community services, advocacy groups and individuals interested in social policy.

In addition to supporting the sector, VCOSS represents the interests of Victorians experiencing poverty and disadvantage, and advocates for the development of a sustainable, fair and equitable society.

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VCOSS acknowledges the traditional owners of country and pays respect to past, present and emerging Elders.

This document was prepared on the lands of the Kulin Nation.



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Introduction

The Victorian Council of Social Service (VCOSS) welcomes the opportunity to provide feedback to the SkillsIQ discussion paper on disability education delivery.

VCOSS is the peak body for social and community services in Victoria. Our members include charities, peak bodies, frontline service groups, advocacy organisations and individuals passionate about the development of a sustainable, fair and equitable society. As part of our sector leadership, VCOSS advocates for systemic change to improve the lives of people with disability. VCOSS supports over 40 Victorian disability advocacy organisations to undertake collaborative systemic advocacy under the banner of the 'Empowered Lives' campaign.¹

The vision of the NDIS is to provide people with disability choice, control and confidence in selecting quality services and supports. This vision is contingent on having sufficient workforce capacity (supply) and the right capability (skills and attributes). Ensuring current and prospective disability workers can access high quality, comprehensive and consistent training is a critical component and enabler of Australia's transition to a consumer-driven environment.

As highlighted through our submission, the rights, interests and needs of people with disability and their support network should be at the centre of every aspect of training design, delivery and evaluation. There is no better way of ensuring that disability worker training meets the expectations and needs of people with disability than by involving people with disability themselves.

Quality and safeguards in the disability sector have been under the spotlight for many years. Inquiries into the harrowing neglect of South Australian woman Anne-Marie Smith, along with the ongoing work of the disability and aged care Royal Commissions, have highlighted significant workforce-related issues, risks and gaps.

The ongoing work of the Royal Commissions provides a clear window of opportunity to focus on how safety, quality and duty of care are embedded in training courses. Our submission highlights the benefits of this kind of highly qualified workforce and how it can support consumer choice and promote the value and culture of training in the disability sector.

¹ Empowered Lives, empoweredlives.vcoss.org.au

Recommendations

- Implement fully supported traineeship programs which provide supports for both trainee and employer for the duration of the traineeships
- Co-design programs with community sector organisations for certain population groups to ensure programs provide appropriate supports that meet specific needs
- Educate the sector and potential students/trainees about the benefits and value of traineeships as genuine career pathways through the gathering and sharing of stories and evidence of existing programs and experiences
- Invest in the capacity of organisations to increase student placements by scaling-up current examples of innovative practice
- Engage people with disability and their support networks to:
 - Ensure the rights, interests and needs of people with disability are a shared, valued priority
 - Co-design training programs and delivery
 - Identify meaningful performance indicators aligned to key training outcomes
 - Seek their feedback and insights about the quality of services and support received
- Train and employ people with disability to teach and assess training programs
- Provide funding to enable smaller organisations to participate in course reviews and development
- Provide training providers with funding to collaborate with industry to develop industry relevant courses
- Ensure any pre-certificate courses are fully funded for providers, and fully subsidised for learners
- Promote the development and introduction of a national disability worker register to improve skills, quality, safety and consistency

Enablers of and barriers to training delivery

Response to question 2: What could be done to promote a culture of training in the disability sector?

Early and ongoing training and professional development opportunities are essential components to maintaining and building the skills, competence and professionalism of the disability workforce. Developing and nurturing a culture of learning and training takes time, resources and commitment from governments, service providers and workers.

Research shows one in five newly recruited disability workers have a qualification.² One in four disability workers received less than one day of training in the past 12 months.³ Casual workers, who comprise a large proportion of the workforce, may be less likely to receive training depending on their nature of employment.

Disability services providers have significant concerns about workforce development⁴, however in the marketised NDIS funding environment, financial and operational pressures restrict or limit the provision of training and professional development. Within hourly based rates to deliver individualised support for participants, service providers must find capacity and funding to cover the costs of in-house or external training, the wages of staff undertaking training, and the wages of staff back-filling the roles of those on training. To build a training culture, the issues around resourcing and the costs of providing training, professional development and mentoring need to be addressed.

While measures targeted at the workforce of the future are welcome, training and skills development initiatives should focus on supporting both new and existing workers. Two options to boost the skills and expertise of the workforce that are relevant to consider include a staged transition to minimum qualifications and/or the introduction of a national workforce registration scheme.

VCOSS members have a diverse range of views on minimum qualifications and value the choice and control of people with disability to select the workers who best match their needs.

² National Disability Strategy, *Australian Disability Workforce Report 3rd edition*, July 2018.

³ N Cortis and G van Toorn, *Working in new disability markets: A survey of Australia's disability workforce Sydney: Social Policy Research Centre, UNSW Sydney, 2020*, p.73.

⁴ G Carey, M Weier, E Malbon, G Duff and H Dickinson, *How is the Disability sector faring? A report from National Disability Services' Annual Market Survey*, February 2020, p.28.

However, a gradual transition to minimum qualifications, coupled with improvements to the accessibility and quality of courses, could work to lift service standards and safety across the sector and boost the value and respect of the disability workforce. Part of the transition to minimum qualifications could include a stronger focus on funded and consistent minimum training, provisions for recognition of prior learning (RPL) and work placements, and incentives or resources for workers and providers to engage in learning opportunities.

A workforce registration scheme, designed with capacity-building, quality and safeguarding in mind, could also work to foster a culture of training and professional development in the disability sector. An example of this is the Northern Ireland Social Care Council's scheme, which provides access to training and resources to assist workers to meet continuing professional development requirements of being a registered social worker.⁵ An evaluation of the NISCC Standards of Conduct and Practice also shows they have raised the quality of care provided by workers.⁶

Response to question 3: What could be done to promote traineeships and address the barriers and stigma for certain population groups?

RECOMMENDATIONS

- Implement fully supported traineeship programs which provide supports for both trainee and employer for the duration of the traineeships
- Co-design programs with community sector organisations for certain population groups to ensure programs provide appropriate supports that meet specific needs
- Educate the sector and potential students/trainees about the benefits and value of traineeships as genuine career pathways through the gathering and sharing of stories and evidence of existing programs and experiences

The Consultation Paper describes two models of VET in disability support – classroom-based technical learning and traineeships – but notes that disability care worker traineeships

⁵ Northern Ireland Social Care Council, [Homepage](#), accessed 29 October 2020.

⁶ Future Social Service Institute, [Valuing social care workers: The Northern Ireland Experience, 19 February 2020](#), accessed 29 October 2020.

are “rare in Australia” and seeks feedback on the opportunity to promote them and address barriers.

As the community services peak body in Victoria, VCOSS notes that traineeships are not a well-established pathway into the community services industry more broadly. This issue is not specific to disability care. Industry-wide, the new worker pipeline is often strongly correlated with student placements, and a key policy concern is that the pipeline operates sub-optimally because many small and mid-size community sector employers lack the requisite organisational capacity and infrastructure to provide placements. VCOSS has been engaged with programs such as Enhanced Pathways into Family Violence Work (described later in this submission) to pilot new approaches to addressing these concerns.

At the same time, VCOSS has also designed two community sector traineeship models, which are currently being implemented as pilots: the Jobs Victoria Community Traineeships Pilot Program (CTPP) and the Department of Education and Training Innovative Traineeships program.

Our insights from these pilot programs, so far, are that key aspects of successful traineeship programs include:

- Collaborative partnerships, established prior to implementation, to deeply understand barriers and co-design solutions – in particular, we note the critical importance of co-designing with industry partners, so that there the model clearly responds to the workforce priorities of employers and has a clear value proposition for them.
- A lead partner to provide overall program coordination and ensure continued collaboration
- Wrap around supports such as access to a support worker. Support workers assist trainees to navigate and overcome challenges that may arise during their traineeship. Depending on the cohort and program, support could be provided both in and out of the classroom.
- Program coordinators who provide ongoing support for employers and workplace supervisors. Through this access to support networks, best practice processes, and collaboration to ensure early identification and management of issues can be achieved.

Response to question 5: Can processes around the supervision of students and the availability of placements be optimised?

RECOMMENDATION

- Invest in the capacity of organisations to increase student placements by scaling-up current examples of innovative practice

The value of on the job training is an integral part of ensuring students gain the appropriate skills and knowledge to be job-ready, and enables job training to be responsive to the needs of individual learners as well as the needs of the employer.⁷

Supporting students to engage in placements takes time and costs money which means current supervision of students on placement varies widely. Many organisations in the sector face staff shortages and have limited capacity to accommodate student placements due to resource constraints. The root causes of these resource constraints are systemic – the community services sector has long experienced a challenging operating environment, with low rates of indexation, insecure funding and short-term contracts. The cost of implementing policy and service system reform, including the transition to the NDIS, has placed further strain on organisations' capacity to provide supervision and mentoring for staff and students. The industry needs support to improve its capacity to take students on placement, and provide a positive, supportive, high-quality placement experience.

The Enhanced Pathways to Family Violence Work project is a model example of how government can support organisations with funding, training and other resources to build the pipeline of workers needed to address critical workforce shortages.⁸

This program invests in training to build supervision capacity and capability within organisations. Participating organisations have access to funding to train staff, including the costs of backfill. Organisational capacity is also built through the following:

- online and administration systems support to support student placement management
- supporting supervisors to build their supervision capability and sector knowledge through communities of practice

⁷ Deloitte Insights, 'The path to prosperity. Why the future of work is human', *Building the Lucky Country* #7, 2019.

⁸ Family Safety Victoria, *Building from strength: 10 year industry plan for family violence prevention response*, Government of Victoria, 2017.

- support to develop formal partnerships with education providers.

This model could be adapted to support the provision and supervision of student placements in growing community services industries, including the disability sector.

Getting the right voices to the table

This section responds to questions 13, 18, 24 and 26 in the Discussion Paper.

RECOMMENDATIONS

- Engage people with disability and their support networks to:
 - Ensure the rights, interests and needs of people with disability are a shared, valued priority
 - Co-design training programs and delivery
 - Identify meaningful performance indicators aligned to key training outcomes
 - Seek their feedback and insights about the quality of services and support received
- Train and employ people with disability to teach and assess training programs

People with disability are the experts in their own lives, and have extensive, lived experience about their individual support needs. People who receive support, and their support networks, are best placed to share their knowledge and expertise with training providers across a range of areas including:

- Course design and delivery
- The creation of activities and case studies to prepare workers for a range of real-life experiences
- The development and measurement of training outcomes to assess the quality and impact of disability worker training

People with disability and their support networks should be engaged through a co-design process to ensure all aspects of course design, delivery, training and outcomes are centred around the needs of people with disability. This approach would promote the rights and interests of people with disability, and build a shared understanding across students, RTOs and providers.

To complement and strengthen the inclusion of lived experience in courses, training providers should support people with disability to gain their Certificate IV in Training and Assessment and employ people with disability in teaching and assessment roles.

RECOMMENDATIONS

- Provide funding to enable smaller organisations to participate in course reviews and development
- Provide training providers with funding to collaborate with industry to develop industry relevant courses

Many people and organisations have insights, perspectives and ideas to share that could support improvements to disability training, and it is important that there is space and time for multiple voices to be heard and valued.

Disability support organisations are funded to deliver services that align to the goals, interests and needs of people with disability. While the perspectives and expectations of providers are important in reviewing and improving disability worker education, as noted above, people with disability as the recipients of support services should also be engaged in all aspects of course design and delivery.

Smaller organisations and rural and remote organisations often do not have the funds to release staff to participate in industry engagement activities run by training providers and the training sector. The disability support sector is large and diverse, so to ensure training is fit-for-purpose and aligned to industry expectations, small, rural and remote organisations should be encouraged and funded to have a 'seat at the table' and participate in industry consultations and committees.

Training providers are currently not provided with funding to engage with industry in the development of resources. While industry validation is an auditing and compliance requirement, due to time and resource constraints, this is often achieved through cursory activities. Providing funding for training providers to engage with industry through robust development and review processes is essential for both the improvement of industry current courses, as well as the implementation of timely updates as industry changes occur.

‘Good fit’ - Attributes required for a disability support worker

This section responds to questions 19 and 22 in the Discussion Paper.

RECOMMENDATION

- Ensure any pre- certificate courses are fully funded for providers, and fully subsidised for learners

Pre-certificate programs provide prospective students with an introduction to and understanding of the work and sector before committing to a full course, and provide an opportunity for learners to get a feel of whether the course is right for them. In the disability training space, a pre-certificate program can service a range of functions, such as:

- improving awareness and understanding of disability, and the human rights of people with disability
- enabling learners to gain insight into the realities of working in the sector, and to consider whether or not the work is aligned with their values and expectations.

Pre-certificate programs should be fully funded and be available both during and after regular work hours to ensure wide accessibility. Fully funding and subsidising these programs is important to ensure they are available and accessible for learners, and does not place undue constraints on training providers to cover the costs of delivery. A different funding stream may need to be investigated to ensure training providers or students don't foot the bill.

The Innovative Traineeships Program, funded by DET and managed by VCROSS, involves trainees undertaking a 12 month traineeship whilst completing the Certificate III in Individual Support (Disability). Prospective trainees/students participate in an eight-day pre-work training program prior to being signed up as a trainee. This pre-work training program includes sessions to introduce foundational knowledge about working in community services more broadly, and specific knowledge about working with people with disability and the National Disability Insurance Scheme (NDIS). Participants also complete the accredited course 22469VIC - Course in Introduction to the NDIS. This free pre-work program provides students with an understanding of the sector and potential roles.

Program coordinators and VET teachers are able to follow up with students who need additional support and have timely conversations about how they feel about the program and future work in the sector. This approach has multiple benefits and works to;

- Provide foundational knowledge and a ‘taster’ of the sector before students commit to a full qualification, therefore enabling students to ‘self-select’ in or out of further studies
- Present opportunities for program coordinators and teaching staff to have values-aligned conversations with students about disability work and offer alternative pathways if appropriate
- Enable training providers/teachers to identify language, literacy and numeracy needs
- Support professionalism of the disability workforce by including an accredited course

In considering values, attributes and fit, it is important to consider that people with disability are diverse and have diverse values and needs. A strong disability workforce needs to reflect the diverse community it supports, including comprising people with disability, people from culturally and linguistically diverse backgrounds, and people with a range of different lived experiences. People with disability and their support networks should be consulted to understand their individual and diverse needs when considering essential attributes of disability support workers.

Challenges of implementing best practice in training delivery

Response to question 30: Is registration of disability support workers a valuable option for ensuring best practice in this workforce nationally?

RECOMMENDATION

- Promote the development and introduction of a national disability worker register to improve skills, quality, safety and consistency

The introduction of a national disability worker registration scheme presents a range of potential benefits and opportunities for workers, providers and people with disability alike. Previous inquiries by the Senate Community Affairs References Committee⁹ and the Victorian Parliament Family and Community Development Committee¹⁰ identified the need for a national disability worker registration scheme.

The dispersed nature of the care workforce makes it difficult to identify, train and mobilise workers in usual times and in times of crisis, such as the COVID-19 pandemic.¹¹ Governments and funders, who have little oversight of and connection to the workforce, are less able to coordinate and implement surge workforce capacity.

A national workforce registration mechanism could improve the quality, consistency, safety and sustainability of the workforce and the sector by:

- Encouraging the professionalisation of the workforce
- Boosting the value and profile of careers in the disability sector
- Strengthening and streamlining safeguarding measures including:
 - worker safety screening checks
 - training in identifying and responding to violence, abuse, neglect and exploitation
 - information sharing protocols with related professional practice registers, and
 - establishing an accessible complaints mechanism to receive and monitor worker-related complaints regardless of jurisdiction or funding source

⁹ Australian Senate Community Affairs Reference Committee, *Violence, abuse and neglect against people with disability in institutional and residential settings...*, Final report, November 2015, Recommendation 2 and 4.

¹⁰ Parliament of Victoria Family and Community Development Committee, *Inquiry into abuse in disability services*, Final report, May 2016, p.111-125.

¹¹ H Dickinson, G Carey and A Kavanagh, *Personalisation and pandemic: an unforeseen collision course?*, *Disability & Society*, 35:6, 1012-1017, June 2020.

- Capturing data about the size, skills and experience of the workforce, to inform areas for targeted planning, action and investment.

Workforce registration schemes exist in many comparable sectors nationally and internationally, including health, nursing, teaching and early childhood. Lessons from the introduction of these schemes should inform the development of a national disability workforce register.

In Victoria, the Victorian Disability Workforce Regulation Scheme will introduce a voluntary worker registration scheme from July 2021. While this is a welcome move, work must continue across governments to progress a national disability worker registration scheme.

There is potential for a well-designed national worker registration scheme to create a range of win-win opportunities for people with disability and the workforce alike, as outlined above. However, the value proposition, role and intent of a worker registration scheme, particularly of a voluntary nature, must be well defined and widely understood by workers, providers and service users to ensure it is an effective, meaningful and valuable mechanism.

It is also vital that workforce registration schemes are carefully designed to ensure the costs to register, or to meet registration requirements, do not present financial barriers for the current and prospective workforce.

