

19 October 2017

Disability Workforce, NDIS Branch
Department of Premier and Cabinet GPO Box 4912
Melbourne, Vic 3001

By email to: disabilityworkforce@dpc.vic.gov.au

SUBMISSION: A registration and accreditation scheme for the Victorian disability workforce Consultation Paper

To Whom It May Concern,

I write to you in regard to the above consultation paper and the Victorian Government's proposed disability workforce registration and accreditation scheme.

On behalf of our Victorian-based member organisation, MS Limited, a disability service provider operating in Victoria, MS Australia supports robust and effective safeguards against abuse and recognises the importance of providing high-quality, person-centred services for people with disability through a skilled workforce. However we have a number of concerns about the proposed scheme and its implications; these concerns are listed below:

1. We welcome the move to a national scheme under the NDIS and the establishment of a nationally consistent approach to safeguards under the NDIS Quality and Safeguarding Framework. In line with these national reforms, we submit that any registration and accreditation scheme ought to be applied nationally, rather than to any one state. In this way, we hope to avoid the implementation of multiple state-based schemes which will only further add to the confusion of workers, providers and people with disability, many of whom already find it difficult to navigate the current regulatory landscape.
2. The proposed scheme risks acting as a barrier to workforce supply at a time when workforce growth is a priority for the sector. To support the demand created by the NDIS, it is estimated that the Victorian disability workforce will need to grow from 19,550-23,900 to 34,400-42,000 full-time equivalent workers in 2019¹. While it is important to ensure those workers employed are of high-quality, with the appropriate

¹ 27, April 2016 Victoria Market Position Statement

www.ndis.gov.au/html/sites/default/files/documents/Market%20Position%20Statement/Victorian-MPS.pdf

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skills, and that there are sufficient safeguards in place, registration processes must not create an unreasonable barrier to workforce entry which will restrict our ability to provide services to participants who need them. We are also concerned about any additional cost for individual disability support workers. We are particularly concerned that an annual registration charge for individual workers may encourage workers to move from the disability sector to other sectors such as aged care. Providers are not in a position to absorb any additional costs due to NDIS pricing.

In the event that a scheme is implemented, it is strongly recommended that worker registration should be fully subsidised by the Victorian Government on an ongoing basis, or for no less than five years from the date of implementation.

3. There is little evidence that formal qualifications for workers correlates with a reduction in abuse of people with disabilities. Strategies which address organisational culture and processes and empowerment of people within a human rights approach, backed by strong advocacy, are arguably more effective at tackling abuse.
4. We suggest that the establishment of the scheme as proposed would be at significant cost, and that this funding would be better utilised elsewhere. We recognise and support the Victorian Government's commitment to respond to the findings of the Victorian Parliamentary Inquiry into Abuse in Disability Services 2016, however we suggest that a more effective use of the funds would be in supporting existing disability advocacy services, and in extending implementation of a 'zero tolerance' approach to disability abuse across all disability services.
5. Some people with disability are concerned that the proposed scheme has the potential to restrict participant choice and control by limiting the range of workers they may choose from. By establishing itself as the determinant of quality, the Victorian Government risks limiting choice, and thereby undermining one of the key drivers of the NDIS. That said, it is important to ensure appropriate safeguards, and implementation of a national screening process which apply to all workers.
6. Should the Government proceed with the proposed scheme, we would support mandatory registration for workers undertaking particular tasks, including allied health activities and engagement in restrictive practices. For all other workers however, registration should be on a voluntary basis. This would allow those

workers interested in doing so, perhaps to enhance their marketability, to opt into the scheme, whilst others would be required to meet national screening requirements. It is noted that whilst NDIS pricing does not reflect higher qualifications, skills or experience, worker registration may not be highly valued in the marketplace. There is also concern that if the scheme is broad in its scope, registration may become a disincentive for mainstream providers (such as swim teachers) to provide services to people with disability. In this way, an unintended consequence may be inadvertent segregation of people with disability, at a time when community accessibility and participation is a primary goal.

MS Australia asks the Victorian Government to reconsider its commitment to a local registration and accreditation scheme. The proposed scheme may have an adverse impact on the disability workforce, and the wider sector, without significantly improving outcomes for people with disability.

Yours sincerely,



Deidre Mackechnie
Chief Executive Officer

