

Ms Heather Dear

Independent Pricing and Regulatory Tribunal

Level 16, 2-24 Rawson Place

Sydney NSW 2000

Dear Ms Dear

Re: Out-of-Home-Care Costs and Pricing Consultation Paper

The ASU welcomes the opportunity to comment on the Consultation Paper for this timely and significant review.

The Australian Services Union NSW & ACT (Services) Branch (the ASU) represents workers throughout the non-government social, community and disability services sector. Of specific relevance to this Review, the ASU represents workers who are employed in the NSW non-government out-of-home-care (OOHC) sector. Our members are in a range of roles including residential care workers, house managers, senior management and chief executive officers.

ASU members work across New South Wales in metropolitan Sydney, Wollongong and Newcastle, outer suburban areas, regional cities and towns and remote parts of the state.

ASU members also work in related services such as child protection, early intervention, family support, youth justice and youth advocacy.

ASU members are highly skilled practitioners. They hold qualifications in law, psychology, management, social sciences, welfare work, disability work, social work, youth work, child protection, aged care and community work, mental health, drugs and alcohol counselling and a long list of other specialist qualifications.

ASU members have a strong commitment to protecting children and young people from neglect, abuse, exploitation, and injustice. They also work with and support children,

young people and their families in times of crisis and trauma and work to prevent young people entering the criminal justice system.

The ASU urges the review to consult directly with non-government (NGO) providers of OOHC, in particular those established NGO providers that have been providing care to young people over the period of time that different approaches to the OOHC system in New South Wales have been introduced and implemented. In particular NGO providers who were supporting young people in care at the time the Permanency Support Program (PSP) model began and have continued to provide OOHC until today. These providers are best placed to share their experiences and the outcomes for young people in their care under the different policy approaches to and funding models of the OOHC system.

We will focus our comments, on the costs involved in providing care and support to children and young people in out-of-homecare, to the area of labour, training and on costs as they relate to workers employed by non-government organisations (NGO) providing OOHC.

A stable highly skilled workforce is essential to the provision of quality OOHC that ensures the safety and well-being of young people in care and delivers good outcomes for young people when they transition out of care. Attracting and retaining experienced and skilled OOHC workers is crucial for this to occur and must be considered when reviewing the costs of OOHC in NSW.

### **Wages**

Workers employed by non-government organisations providing OOHC are covered by the SCHADS Award under the Federal Award System.

#### **Wages cannot be costed at lower than SCHADS Award rates including penalties and loadings:**

- Minimum rates of pay taken from SCHADS Award classifications and Fair Work awarded increases. Classifications must be commensurate with the qualifications and skills required and the complexity of residential care work with young people in statutory care, experiencing homelessness, with mental illness, and trauma related behaviours.

- Shift penalties to be included – afternoon, evening, Saturday, Sunday, public holiday.
- Superannuation to be included.
- Allowances to be included– meal, sleepover, on-call, excursion (including reasonable provision for overtime worked when on-call / sleepover / excursion).

**Paid Entitlements and Workers Compensation:**

- Workers compensation premiums adequately covered.
- Statutory and Award leave entitlements – Annual leave including 5 weeks annual leave for shift workers, personal leave, long service leave, domestic violence leave.

**Need for Adequate overhead costs for supervision, support and training:**

- Provisions for clinical supervision of staff.
- Provisions for onboarding of staff – induction, buddy shifts.
- Provisions for regular team meetings.
- Provisions for ongoing professional development and training – including covering the cost and time of attaining any qualification requirement of the program (e.g. Diploma qualification for therapeutic care workers).
- Provisions for HSRs at a reasonable ratio to be trained and perform their work.

**End of contract considerations:**

- Provisions to be made for redundancy and notice requirements in case of contract not renewed or funding ceasing.

**Continuity of care & permanent employment provisions:**

- Costing should consider maximising permanent employment (FT and PT) and regular reporting on this.

The ASU thanks you for the opportunity to make this submission and looks forward to the work and report of the review. Should the review have any questions of the ASU please contact me [REDACTED].

**Angus McFarland**

Branch Secretary

Australian Services Union

NSW & ACT (Services) Branch