

#### 4 September 2025

The Fair Work Commission Level 14, Central Plaza Two, 66 Eagle Street Brisbane, QLD, 4000 GPO Box 5713 Delivered by email: awards@fwc.gov.au

Dear Fair Work Commission,

#### **SCHADS AWARD REVIEW**

Q Shelter is Queensland's peak body for housing and homelessness. We envision a future in which every Queenslander has a home. Incorporated in 1993, Q Shelter is a membership-based organisation that works to strengthen housing system capacity and influence policy and investment to support effective solutions.

## **Background**

Many of our member organisations are covered by the Social, Community, Home Care and Disability Services (SCHADS) Award system. Accordingly, Q Shelter is strongly committed to contributing to the current review process to ensure that our members' perspectives are represented and their interests carefully considered. Q Shelter's membership includes Specialist Homelessness Services (SHS), Community Housing Providers (CHPs), the wider human services sector, academic institutions, other peak organisations, community members, individuals with lived experience of homelessness, and private sector stakeholders. We are engaged at all levels of government, working collaboratively with the public and private sectors, the community services sector, and the wider community to achieve real solutions that succeed through to implementation.

# **SCHADS Award Review**

Q Shelter welcomes the Fair Work Commission's review of the SCHADS Award as an important step toward addressing long-standing undervaluation in the wider sector. Over 70 percent of our workforce identify as female and therefore award rates and pay scales in this industry disproportionately impact a female workforce (Q Shelter and Homelessness Queensland, 2024).<sup>1</sup>

For over 30 years, the classification system in social, community, and disability services has remained largely unchanged, despite the growing complexity and significance of this essential and skilled work. With a workforce that is predominantly female, we strongly support initiatives that promote equity and inclusion. At the same time, it is vital that the review delivers a fit-for-purpose classification system that provides fair pay and clear career pathways for all workers. Recruitment and retention across the housing and homelessness sector are already significant challenges<sup>2</sup>. Establishing appropriate award classifications is crucial for the sustainability of the workforce long-term.

We understand the Fair Work Commission's review of the SCHADS Award proposes significant changes with direct implications for the housing and homelessness sector, where most workers

<sup>&</sup>lt;sup>1</sup> Shelter and Homelessness Queensland, 2024. Workforce wellbeing, attraction and retention in the housing and homelessness sector in Queensland. Published by Q Shelter

<sup>&</sup>lt;sup>2</sup> James, A., Dunlop, P. D., Gilbert, C., Gilbert, J., Gagné, M., Parsell, C., Cawthray, J., & Farid, H. (2023). *Investigative Panel into building and retaining an effective homelessness sector workforce* (AHURI Final Report No. 409). Australian Housing and Urban Research Institute Limited. <a href="https://www.ahuri.edu.au/research/final-reports/409">https://www.ahuri.edu.au/research/final-reports/409</a>, https://doi.org/10.18408/ahuri8128901 <a href="https://www.ahuri.edu.au/research/final-reports/409">AHURI+1</a>



# Because home matters

are employed under this system. Q Shelter notes that the Commission has recommended the amalgamation of the Award's five separate classification structures into a single framework, aligned with the 'Caring Skills' benchmark rate adopted in the recent Aged Care Award. This reform acknowledges the persistent gender-based undervaluation within the social, community, and disability services sector and seeks to both simplify pay scales and more accurately reflect the complexity and value of the work undertaken. The proposed framework also places greater emphasis on formal qualifications as a key determinant of classification.

### Q Shelter's Feedback

We wish to raise some concerns regarding the Fair Work Commission's provisional approach to aligning homelessness work with the Aged Care Award under the SCHADS review. While we recognise the intent to simplify classification and improve pay equity, this approach does not fully account for the distinct nature of homelessness work. In particular:

- 1. Pay implications: The proposed structure may reduce pay for homelessness workers at Levels 3 and 4 of the SCHADS Award. This is particularly concerning for junior roles, where lower pay could make it more challenging to attract new workers and could exacerbate existing workforce shortages.
- 2. Sector differences: People who work in the homelessness sector have unique skills, contexts, and complexities including responding to crisis situations, supporting clients with complex needs such as mental health challenges and substance use, navigating housing systems and needs, and providing case management across highly varied and often unpredictable environments.
- 3. Aligning pay scales with the aged care system overlooks the challenges this industry faces due to extremely low wages that don't reflect the level of care and responsibility that the aged care workforce is required to provide.
- 4. Concerns with the provisional structure: While Q Shelter supports the professionalisation of the sector generally and recognises the value of formal qualifications, this process needs to be implemented gradually, with careful consideration of existing educational gaps. We advocate for the development and promotion of qualifications that equip and prepare the future housing and homelessness workforce. However, overreliance on formal qualifications is concerning at present, as many specialised roles—such as tenancy managers or asset managers in the housing space—lack established or widely recognised qualifications. Most existing qualifications for asset managers focus on commercial rather than residential property, and expertise in these roles is typically developed through practical experience and sector-specific training. A more flexible approach is essential to ensure that experienced workers, whose skills, practical knowledge, and expertise are invaluable, are not excluded from career opportunities
- 5. Service context: Our sector encompasses a wide range of programs and workforce compositions, with significant contributions from individuals with lived or industry experience. These individuals often join the workforce without formal qualifications but provide invaluable insights that enhance service delivery, inform effective policy, and support best practice. The proposed increased reliance on formal qualifications risks overlooking this lived experience and expertise, which is increasingly recognised—both within the homelessness sector and the broader health sector—as essential to delivering responsive, high-quality services.
- 6. Concerns with proposed rates: The suggested rates risk reducing future pay, creating inequities through grandfathering or two-tiered systems, and may undervalue roles that draw heavily on lived expertise rather than formal qualifications. From another perspective, the new structure could create promotions, making it challenging for organisations to plan



financially while rewarding staff appropriately, and may also result in the demotion of existing workers, directly reducing their pay.

## **Key Recommendations**

- 1. Implement safeguards to ensure pay does not decrease for existing workers, particularly in junior roles, and maintain incentives to attract and retain new staff
- 2. Ensure the classification structure recognises these unique skills and contexts, rather than assuming a one-size-fits-all approach aligned solely with aged care benchmarks
- 3. Promote and develop qualifications for the housing and homelessness sector, while adopting a gradual and flexible approach that acknowledges educational gaps. Ensure experienced workers, whose skills, practical knowledge, and expertise are invaluable, are not excluded from career opportunities
- 4. Value and integrate lived experience and expertise in workforce classification, training, and career pathways. Recognise these contributions as essential to delivering responsive, high-quality services
- 5. A more flexible and gradual approach to implementing the new rates is needed. This should safeguard existing pay, recognise the value of lived and industry experience, and provide organisations with sufficient planning time to manage promotions without compromising financial sustainability.

Q Shelter welcomes the Fair Work Commission's review of the SCHADS Award, recognising its intent to address longstanding gender-based undervaluation and simplify classifications. While we support these aims, we caution that the provisional structure does not fully reflect the unique skills, contexts, and complexities of the housing and homelessness sector work, nor the value of lived and industry experience. We recommend a gradual and flexible approach to professionalisation that safeguards fair pay, career pathways, and workforce sustainability, while ensuring that experienced workers without formal qualifications are not disadvantaged.

### **Further Contact**

For questions or comments on this submission, please contact our General Manager, Policy & Strategic Engagement, Jackson Hills at <u>Jackson.Hills@gshelter.asn.au</u> in the first instance.

Yours sincerely

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