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Fair Work Commission – Gender Undervaluation Priority Awards Review

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To Whom It May Concern:

SCHADS Alternative Classification Structure

Background

Q Shelter is Queensland's peak body working to address housing needs and homelessness. We envision a future in which every Queenslander has a safe, affordable and accessible place to call home. We lead on solutions to unmet housing needs and homelessness. Incorporated in 1993, Q Shelter is a membership-based organisation that works to strengthen housing system capacity and influence policy and investment settings to support effective solutions. 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 successful implementation.

Q Shelter staff and member organisations operate under the SCHADS Award. Q Shelter members employ a diverse workforce across frontline homelessness services, housing and support services and related functions.

Recognising the sector's ongoing recruitment and retention challenges, including high turnover, Q Shelter and sector partners delivered the HomeNow campaign under the Workforce Connect Fund. HomeNow promoted the sector's career pathways, showcasing the rich and rewarding roles available to aspiring professionals and practitioners in our industry. As such, a fair and well-structured award system is crucial for attracting, supporting, and retaining skilled staff across Queensland's housing and homelessness services.

General view on the alternative classification structure

Q Shelter welcomes the Commission's release of the alternative classification structure and considers it a clear and material improvement on the provisional proposal published in April 2025. The alternative structure provides a stronger foundation for recognising the complexity, responsibility, and skills involved in frontline community services work, including homelessness support roles.

In particular, we support the alternative structure because it:

- Better protects existing rates of pay and progression through the restoration of pay points and an increased number of classification levels
- Provides clearer differentiation between roles, better reflecting the complexity of frontline service delivery
- Recognises that qualifications are only one component of capability, alongside lived experience, industry experience, and demonstrated skill

In homelessness services, workers routinely exercise high levels of professional judgement, risk management, and trauma-informed practice, often in crisis contexts. A classification structure must accurately reflect these realities.

Views on unresolved issues

Deputy President O'Neill's Report identifies 13 unresolved issues requiring further feedback. Q Shelter highlights the following matters as priorities for the homelessness sector.

- Issue 1 – Entry-level for disability support workers. Q Shelter supports the entry level for disability support workers being set at Level 3 rather than Level 2, consistent with the responsibilities and expectations of these roles.
- Issue 2 – Entry level for Social and Community Services (SACS) workers. Q Shelter supports the view that the entry level for Social and Community Services (SACS) workers should be Level 5, not Level 2. Homelessness services staff routinely work with people experiencing significant risk, including domestic and family violence, rough sleeping, mental health crisis, substance use, and child protection involvement. Entry-level roles in homelessness services frequently require skills and responsibilities consistent with current SCHADS Level 3 roles and align more appropriately with the proposed Level 5. Setting the entry point too low risks undervaluing the work, exacerbating workforce shortages, and undermining retention in a sector already under significant strain.
- Issue 4 – Pay point progression. Q Shelter does not support pay point progression being based on full-time equivalent hours worked. The homelessness workforce includes a high proportion of part-time employees, and progression should reflect competency, experience, and role requirements, rather than hours worked. An hours-based progression model risks entrenching gender inequity and disproportionately disadvantaging workers with caring responsibilities.
- Issue 9 – Qualifications as a strict requirement. Q Shelter does not support qualifications being a strict prerequisite for access to a classification level. Homelessness services rely on a workforce that includes people with lived experience of homelessness, workers with deep community and cultural knowledge, staff with long-standing industry experience, and demonstrated capability in crisis intervention and housing support. While qualifications are important, classification should reflect the role's requirements and the full range of skills and experience the work requires. This approach supports inclusion, workforce development, and recognition of diverse pathways into homelessness services.
- Issue 10 – Equivalency of qualifications. Q Shelter supports the proposed definition of equivalency of qualifications. Clear equivalency arrangements are essential in a sector where skills are developed across diverse service settings and professional pathways.

Overall, Q Shelter considers the alternative classification structure a substantial improvement over the earlier provisional proposal and an important step toward a more accurate and equitable classification framework.

Homelessness services rely on a skilled workforce that operates in a complex, high-pressure environment to support people in crisis and transition to housing. Classification structures must reflect this. We urge the Expert Panel to adopt the alternative structure with the proposed amendments, especially regarding entry levels and fair progression. Timely implementation is crucial for workforce stability, and the sector recognises that the Australian Services Union plans to raise SCHADS Award rates after the structure is settled, suggesting implementation might be best after that process.

Further contact

Q Shelter thanks the Commission for the opportunity to provide this submission. For further questions or contact, please liaise with our Policy & Strategic Engagement Lead, Maya Glassman at Maya.Glassman@qshelter.asn.au, in the first instance.

Yours sincerely



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