

Department of Health, Disability and Ageing
C/o Australian Health Care Associates
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Submission to Disability Safeguards Consultation

HumanAbility welcomes the opportunity to contribute to the Disability Safeguards Consultation. HumanAbility is the Jobs and Skills Council (JSC) for the Care and Support Economy.

One of 10 JSCs established in 2023, our role is to provide leadership to address skills and workforce challenges for our industries, with a focus on the Vocational Education and Training (VET) qualified workforce. We are responsible for ensuring the aged care, disability, children's education and care (CEC), health, human (community) services, and sport and recreation sectors are supported by skilled, adaptable, and sustainable workforces to achieve positive economic and social outcomes for industry, community, and individuals. Our four key functions are workforce planning, training product development, implementation, promotion and monitoring; and industry stewardship. We are tripartite. Our governance structure and stakeholder engagement approach reflect government, union and industry, and centring the lived experience of participants in supports.

HumanAbility supports the goal of a consistent national approach to quality and safeguards for people with a disability and the broader direction of the consultation paper. We also recognise that safeguarding must balance protections with people's right to choice and control, and that this balance is at times contested. A skilled, sustainable workforce capable of delivering quality, rights-based support, and a consistent culture of safety, rights, choice and control, across jurisdictions and service settings is essential to improving outcomes. Achieving these ambitions will require practical and adequately resourced implementation, as the workforce is already navigating persistent shortages, increasing complexity, and growing demand.

Delivering the intended safeguarding reforms will require targeted and sustained investment in workforce capability, organisational readiness and sector wide transition planning. Frontline and supervisor roles will need clear expectations and higher-level skills in areas such as human rights-based practice, supported decision-making and incident and complaints handling.

Developing these higher-level capabilities will require dedicated training time, supervisory support and workforce backfill, which are not consistently funded within the current market settings. On-the-job learning, supervision, and structured mentoring are central to quality and safeguarding, and these activities must be recognised and funded through supportive commissioning and funding models to avoid implementation gaps, and inconsistent practice, and pricing that reflects the true cost of service delivery.

Experience from Victoria's disability worker regulation shows that unified qualification and competency expectations can strengthen practice and quality, but they require adequate resourcing for providers to deliver the required training and sector regulators to lift quality.

We recognise that this consultation is the first step in the development of the *Safeguards framework*, and subsequent stages of the consultation have not yet been released. Further work to implement the Framework requires ongoing co-design with people with a disability and key workforce partners. We also recognise that the Disability Royal Commission NDIS Review and Registration Taskforce offer substantial recommendations to lift sector safeguards. We look forward to hearing how government responses to these systematic reviews can be joined up with this Framework, as part of a clearly defined roadmap.

As a Jobs and Skills Council, HumanAbility looks forward to continuing to partnering with sectors and government to translate the framework to future reforms that to ensure the workforce implications are well understood and that expectations are practical to implement. Early involvement of workforce partners will assist government to anticipate resource requirements and plan for realistic, staged transition. Co-ordinated implementation across sectors, supported by clear timelines and practical guidance, will also be important to avoid unintended strain on the workforce.

An intersecting project with this work that we are leading is the review of aged care, disability, leisure and health qualifications, such as the Certificate III in Individual Support CHC33021 and Certificate IV in Disability Support CHC43121 and Diploma of Leadership in Disability Services 11076NAT. Due for completion in 2026, this work will identify the skills and capability requirements needed to embed quality and safeguarding in everyday practice.

This review offers opportunities for people with disability to directly shape training content and delivery, through co-design of qualifications, skill sets and lived-experience training. But translating improved training and safeguarding expectations requires improvements in sector capability and workforce support.

HumanAbility recommends the Australian government:

- Ensure that subsequent stages of the framework and strategy are co-designed with people with disability and key tripartite workforce partners, including HumanAbility and the VET sector, to support realistic planning for workforce capability building and resourcing.
- Recognise and fund additional workforce demands arising from the updated strategy, including supervision, mentoring and structured training time, as a core safeguarding activity.
- Support alignment of safeguarding capability expectations with VET qualifications, accredited skill sets, and existing workforce capability frameworks.
- Coordinate reform across sectors to minimise duplication, cost, and complexity for workers, care recipients, and providers.

HumanAbility is committed to supporting a stronger, safer and more capable disability workforce, and looks forward to continued engagement as the safeguarding framework development progresses.

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