

SCHADS Award changes Submission

Introduction/Overview of Includa

Includa is an NDIS Registered Provider, established in 2017 with a focus on creating flexible, stable and meaningful work opportunities for Disability Support Workers. This approach in turn facilitates flexible, stable and meaningful support opportunities for people with a Disability in our Community.

As a key component of this, our valued Support Workers choose when and where they work, and the people that they support. Although this support model has operational challenges, it allows us to provide Support Workers with flexibility and value far greater than a traditional rostering format. This model of support also allows people we support to have true choice over who supports them and when they receive that support; both fundamental principles of the NDIS.

We are very pleased to offer our Support Workers SCHADS Level 2.2 wages at their commencement. Notably, we pay this from the Social and Community Worker section of the SCHADS Award, rather than the Home Care component, as do many other NDIS Providers.

In recent months, Includa has well-documented issues with incorrect information provided to us by the Fair Work Ombudsman, which resulted in our non-compliance with aspects of the SCHADS Award. In response to these issues, we have worked consultatively with our employees, the Australian Services Union and the FWO. Given the aforementioned issues with the interpretation of the SCHADS Award, Includa warmly welcomes the rationalisation and amendments to the SCHADS Award that will better suit the current employment landscape in the Disability Support sector and innovative approaches to service delivery.



We are very grateful for the opportunity to provide below a submission to the Fairwork Commission on the proposed changes to the SCHADS Award.

Minimum 2 Hour Engagement for Permanent Staff

Inclüda currently employs 22 Part-time Support Workers and provides them with consistent work opportunities. Inclüda is in full support of the proposed changes to the SCHADS Award that will align Permanent Part-time Workers with Casuals, for a 2 hour minimum engagement

Broken Shift Allowance

Based on our experiences of employing Disability Support Workers to meet the flexible needs of people with a Disability in the community, we do not believe that a broken shift allowance, in addition to paid travel between engagements, is a rational response to multiple engagements in a 24 hour period.

Inclüda believes that one of these two proposed provisions related to multiple shifts will be suitable to remunerate Support Workers for the requirement to travel between engagements. It is our understanding that a broken shift allowance may be a more appropriate and practical measure to achieve the aforementioned remuneration.

Paid Travel Between Shifts

Again, Inclüda is in full support of Disability Support Workers receiving some form of remuneration for time spent between engagements. Given the variability of the distances and times that our Support Workers choose to travel between engagements, we believe that the above broken shift allowance would be a more practical way to facilitate this remuneration.



If the Fair Work Commission does determine that paid travel and/or broken shift allowances are implemented, Includa would hope that these provisions are clear, limited and based on a practical and easily implemented calculation.

Roster Variation

Includa is in full support of Workers having the capacity to swap shifts with other Support Workers and already facilitate similar arrangements through our online communication platform. This is a fundamental principle of our flexible approach to Support Worker time and engagements.

We believe it is important for the FWC to clearly articulate how this explicit ability to swap shifts may impact the proposed changes to remote response/return to work provisions. In particular, will a worker requesting to swap, or a worker agreeing to swap be considered a remote work response.

Remote Response/Recall to Work

Includa is committed to engagement with our valued Support Workers to ensure they can receive timely advice, guidance and assistance from us when it is required. To do this, we have implemented an online instant messaging platform available to our Support Workers on a company owned device provided to them by Includa, which allows us to provide this level of support to our staff.

Includa also utilises this online platform to share opportunities for our employees to build a work schedule, based on their personal preferences and availability. Our employees will also use this platform, in some circumstances, to communicate directly with people they support and do so at their own discretion.



While Includa agrees, in principle, that Support Workers should be remunerated for their work completed outside of face-to-face support provision, the nature of our business and modern disability support work requires that the particulars of what constitutes a return to work and how this impacts remuneration be clearly stipulated within the new Award.

On this, Includa expects that each discrete activity (reading or sending a message on our platform) does not constitute a new remote response. Rather than a payment for each discrete activity, Includa proposes that an amount be paid to a Support Worker based on the hours of direct support they provide, or the amount of individuals they support within a specified period. For instance, a Support Worker may be paid an extra 15 minutes for each person they support, or for each 10 hours of support they provide in a week.

Client Cancellation

Includa welcomes the opportunity to redirect Support Workers to other tasks or shifts in response to client cancellations. We hope that final Award changes clearly stipulate whether an employee will have ability to refuse a Support Worker the 2 hour minimum engagement for a cancelled shift, if they do refuse to be redirected to other work.

Clothing and Equipment Reimbursement

Includa is in full support of this proposed amendment to the Award and already offers full reimbursement for equipment that is damaged or soiled in the course of ordinary employment activities. Includa also pays for the cleaning of a Support Worker vehicle, if soiled during work tasks.



24 Hour Care

Inclüda is in full support of the proposed changes to the 24 hour care components of the SCHADS Award, however we would also like to suggest that this be extended to shifts on a supported holiday and a reconsideration of the excursion clause of the Award to ensure consistency.

Sleepovers

Inclüda is in full support of the proposal to the changes to sleepover supports, in addition to the proposed changes we would also suggest that the current allowance is extremely low and does not adequately remunerate Support Workers for the inconvenience of spending a night away from their home. Inclüda currently pays over double the allowance to all staff who complete a sleepover shift.

Yours sincerely,



Mitchell Jones

Director

