

Response to the Consultation Paper regarding:

A registration and accreditation scheme for the Victorian disability workforce

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Contents

1. About VALID	3	
2. The Issue	4	
3. The Current Context	4	
4. VALID's Position	5	
4.1. Support independent, legislated registration & accreditation		5.3. Regulatory gaps
4.2. Skilled support to build capacity		5.4. Potential problems
4.3. Choosing to employ & train your own support workers		5.5. Policy & regulatory framework
4.4. Quality support services		5.6. Who should the scheme apply to?
4.5. Workers should have values that are consistent with human rights principles		5.7. A broad versus narrow scope
4.6. Workers should have personal qualities that enable person-centred & empowering support		5.8. Disability workers registered under other schemes
4.7. Workers require training to ensure they have specific knowledge & understanding of the diversity of disability support needs		5.9. Worker exemption
4.8. Workers involved in supporting people with higher needs particularly either medical or behavioural needs, require skills training & higher level qualifications		5.10. System-wide protections
5. VALID's Response to the Consultation Paper	7	5.11. How should the scheme operate?
5.1. Supporting an independent, legislated registration & accreditation scheme for Victoria's disability workforce		5.12. Voluntary registration
5.2. Opportunities to provide value		5.13. Reserved titles
		5.14. Demand
		5.15. Higher risk activities
		5.16. Regulator powers & functions
		5.17. Accreditation powers
		5.18. Disciplinary powers
		5.19. Powers to share information
		5.20. Establishment of the Regulator]
		5.21. How should the scheme be implemented?
		5.22. Recruitment of people with disabilities
		5.23. Scheme costs
		6. Recommendations
		16

1. About VALID

The Victorian Advocacy League for Individuals with Disability (VALID) is the peak organisation in the Victorian disability sector representing adults with an intellectual disability and their families. VALID is run by and for people with disability and family members. VALID has particular expertise in networking and providing information to people with disability and families across the state.

VALID is committed to the vision of an Australian nation in which people with a disability are empowered to exercise their rights – as human beings and as citizens – in accordance with the United Nations Convention on the Rights of Persons with Disabilities. VALID strives to realise its vision through a range of strategies that work to empower people with disabilities to become the leaders of their own lives. VALID empowers adults with an intellectual disability through:

- Individual advocacy support
- Systemic advocacy and representation
- Keys to Success and Staying Safe training
- Self advocacy training and support
- Family advocacy training and support
- Information and resources
- Community development
- Peer support

VALID represents the interests of adults with an intellectual disability and their families within a range of networks, alliances, advisory groups and representative bodies such as:

- Victorian agency member of Inclusion Australia (National Council on Intellectual Disability)
- Disability Advocacy Network of Australia
- Victorian Government NDIS Implementation Taskforce
- NDIA Intellectual Disability Reference Group
- Represented on the Future Social Service Institute Steering Committee
- Registration & Accreditation for Victoria's Disability Workforce Project Advisory Group

2. The issue

The Victorian Government has committed to establishing an independent, legislated registration and accreditation scheme for Victoria's disability workforce. The scheme is intended to spur high quality services for people with disability by ensuring workers have the necessary skills, experience and qualifications.

VALID is concerned that such a scheme might conflict with the NDIS principles of control and choice, and potentially compromise the right of people with a disability to self manage. At the same time, VALID is equally concerned that many people with intellectual disability need the support of a well regulated service sector and the expertise of a well trained, fully accredited workforce in order to build their capacity for self determination and to realise their potential as equal citizens.

VALID's representation on this issue therefore needs to be nuanced. Regulation must be designed in a way that does not unreasonably constrain those people with a disability who have the capacity or potential to self-manage, while at the same time providing strong safeguards for those who require a greater level of support to realise their goals.

VALID's representation must also be grounded in the reality that the current disability support system is widely accepted as 'broken'. When we talk about the need for either self management or registration and accreditation, therefore, we need to be clear that we are talking about the systems of safeguarding and training that need to be established if the NDIA's visionary principles of self determination and community inclusion are to be realised, and not the current systems that have been under-funded and neglected to the point of serious disrepair.

3. The Current Context

VALID believes there are certain current 'realities' that need to be addressed in the development of the proposed registration and accreditation scheme:

- Family members are often 'forced' to self-manage their adult child's funding because service providers do not provide properly trained staff with the appropriate values, qualities, knowledge and skills to work reliably with people with high medical and/or behavioural support needs.
- Many people with intellectual disabilities do not have the support or involvement of family members or informal networks and are particularly vulnerable to abuse or neglect by workers who do not have the appropriate values, qualities, knowledge or skills.
- Service providers often fail to screen adequately prospective workers, to ensure they have the appropriate values and personal qualities, much less the appropriate knowledge or skills.
- Current training courses often fail to equip support workers with the range of knowledge and skills required to meet the diverse needs of people with a disability, much less identify and cultivate the kind of values and qualities that are valued by people with a disability themselves.
- Current training courses fail to draw upon the experiences and learnings of people with disabilities and their families, both in their design and delivery.
- Skills qualifications alone do not stop abuse or neglect, with many examples of qualified workers who have been charged with crimes against people with disabilities; workers with the appropriate personal values and qualities can often be more important to vulnerable people than workers with the so-called 'right' knowledge and skills qualifications.
- Having the appropriate values and qualities, whilst critically important, does not necessarily enable support workers to meet the diversity of disability support needs, nor equip them with the tools to build the capabilities of people with an intellectual disability; workers with the appropriate values, qualities, knowledge and skills can often be the difference between a wasted life and a life worth living.
- Evidence suggests that the main factor in whether or not people with intellectual disability have a good life with a high level of interaction with paid services depends largely on the quality of staff training, support and supervision (e.g. Bigby, Mansell).

4. VALID's Position

4.1 VALID supports an *independent, legislated registration and accreditation scheme* for Victoria's disability workforce.

People with an intellectual disability need the support of workers who have the appropriate values, qualities, knowledge and skills to help them reach their goals. Skilled support workers are needed to enable people with an intellectual disability to achieve their potential for independence; unskilled workers without the appropriate values and qualities can sometimes create further dependency, or 'learned helplessness'.

4.2 People with an intellectual disability need *skilled support* to build their capacity, including their capacity to self direct and potentially self manage; they also need skilled support to safeguard their right to be free from exploitation, abuse and neglect.

An independent legislated registration and accreditation scheme for individual disability workers that complements the NDIS Quality & Safeguards Bill (once enacted) and the work of the NDIS Commissioner will help improve the quality of life for people with intellectual disabilities, by systematically increasing the knowledge and skill levels of the disability workforce.

4.3 People with a disability and families who choose to self-manage their NDIS funding and to employ and train their own support workers must be allowed to employ unregistered workers, should they choose to.

For many people with a disability and family members, there is no higher expression of the right to control and choice than the power to self manage and self employ. For those who choose this path, and have the capacity to meet the necessary requirements, this right must be guaranteed.

4.4 People with an intellectual disability should have the support of *quality support services*.

In VALID's experience, quality support services:

- Have a culture of empowerment
- Safeguard rights and defend people against exploitation, abuse and neglect
- Have strong client/consumer feedback processes
- Have strong accountability and transparency
- Have effective registration, accreditation and quality mechanisms
- Employ knowledgeable and skilled workers with the right values and qualities

4.5 All support workers should have *values* that are consistent with human rights principles.

In VALID's experience, people who are good and decent human beings always make for the best disability support workers. The Preamble to the Charter of the United Nations

Declaration on Human Rights identified the kind of values that human beings commonly share and cherish. They are: cooperation, freedom, happiness, honesty, humility, love, peace, respect, responsibility, simplicity, tolerance and unity. These values should underpin the disability support work force.

4.6 All support workers should have personal *qualities* that enable them to provide person-centred and empowering support.

In VALID's experience, there are certain personality types that are more likely to be empowering and respectful of the rights of people with an intellectual disability, and less likely to be coercive, disrespectful or abusive. VALID's 'To Stand Beside' advocacy training program identifies the following support worker qualities as ideal: passion, good will, flexibility, equilibrium, integrity, humility, courage, self-reliance, discretion, judgement, positiveness and sense of humour.

4.7 All support workers require training to ensure they have specific *knowledge and understanding* of the diversity of disability support needs.

They need knowledge regarding:

- Duty of care (including first aid, epilepsy management, manual handling etc.)
- Rights awareness (including the UNCRPD, legal rights, service user rights, privacy and confidentiality etc.)
- Knowing how to prevent, recognise, respond to and report abuse
- Understanding the advocacy role of the disability support worker (including understanding of conflict of interest)
- Implementing person-centred approaches and person-centred plans
- Developing and supporting a person's capacity to make choices and decisions
- Implementing active supports in day to day life (to facilitate the development of independence and competence)
- Being an effective communication partner
- Ensuring community participation (including working in partnership and community linkages)
- Working in partnership with families, independent advocates and others
- Working to develop and support positive relationships that are sustaining for the person
- Understanding issues of health and wellbeing
- Ensuring quality of life

4.8 All workers involved in supporting people with higher needs, particularly either medical or behavioural needs, require *skills* training and higher level qualifications.

They need skills in:

- Planning and designing individualised skills development, including the positive use of task analysis, cue/model/prompting and chaining to promote developmental learning
- Understanding the functions of behaviours of concern
- Modifying environments and tasks to promote wellbeing and empowerment
- Understanding and managing issues of health and wellbeing
- Identifying and implementing positive behaviour support plans (including teaching protective behaviours to vulnerable people)
- De-escalating and responding to behavioural crises (keeping the person and others safe)
- Supporting the person's capacity to appropriately navigate situations of complexity and/or conflict (i.e. developing resilience)

5. VALID's Response to the Consultation Paper

5.1 VALID supports an independent, legislated registration and accreditation scheme for Victoria's disability workforce.

People with disability should be able to purchase services from people with high-level skills to help them reach their goals. In particular, many people with intellectual disabilities rely on support workers having the training they need to perform certain tasks. A highly skilled disability workforce is needed to do the work of supporting people to live an ordinary life because lower skills in the workforce are much more likely to lead us back to centre-based activities and staying at home on weekends. It is imperative that our systems provide as many opportunities as possible to stop abuse and neglect happening.

While the best way to ensure people with disabilities have strong safeguards is to build their self-direction and self-management skills and strengthen their informal support networks, this takes time and needs to be undertaken by people with skills and experience. People with intellectual disability should receive quality support to build their capacity (including the capacity to self direct) and support to safeguard their rights (including the right to be free from exploitation, abuse and neglect).

An independent registration and accreditation scheme will complement and enhance the scope of work of the NDIS Quality and Safeguards Commission. For that reason, VALID believes the Victorian Registration and Accreditation Scheme should be designed in a way that makes it as smooth as possible for it to be extended nationally at a later stage, should the benefits of the scheme be demonstrated. VALID also believes that the proposed scheme will only be successful if it complements and works seamlessly with the other relevant agencies and jurisdictions. New systems must work in harmony with each other or the risk that people will still be abused will remain.

5.2 Opportunities to provide value

A Victorian registration and accreditation scheme has the opportunity to provide value beyond the national quality and safeguarding system in a number of ways. An accreditation scheme that genuinely looks to lift the current low standard of disability qualifications is urgently needed. People should not be forced to self-manage their funding because service providers do not provide properly trained staff that can work with people with high medical and behavioural support needs – they should be able to purchase services from people with high level skills to help them reach their goals.

The NDIS Quality & Safeguarding Bill (once enacted) is an excellent start but will not provide tools to lift the quality and safety of the disability workforce. Nor will it provide sufficiently detailed data to enable the development of early warning systems related to system failure (e.g. through complaint data), or information about the disability workforce to better target training dollars.

A registration and accreditation scheme that regulates individual workers in the sector means that the quality assurance of training and worker screening will be carried out independently of employers, with the additional checks and balances this brings. The experience in other similar sectors (e.g. health) has shown that this additional layer of quality assurance is warranted when the risk of harm is high, and sizable amounts of public funds are involved.

5.3 Regulatory gaps

A registration and accreditation scheme could address the current challenges facing people with intellectual disabilities who have repeatedly complained about specific support workers but, because of lack of evidence (despite injuries and bruising) and the fact that the person with intellectual disability is deemed to be an ‘unreliable witness’, criminal charges do not end up being laid. Victoria’s Disability Workers Exclusion Scheme is a promising start, but its limited scope and lack of a statutory base still leaves people with disability at risk of abuse or neglect. Also, it does not provide the range of tools for quality assuring the workforce that a registration scheme provides.

A registration and accreditation scheme also addresses the potential gaps in the NDIS Quality & Safeguards Bill (once enacted) regarding the quality of disability worker training, issues surrounding self-employed workers, and the limitations inherent in service providers investigating complaints about their own staff. Where there is nothing on the public record, there is little to prevent a worker who is sacked or pressured to resign from one service from continuing to work in disability services either within or outside the NDIS.

5.4 Potential problems

A Victorian registration and accreditation scheme risks diminishing the ability of people with disability and their families who are self-managing their NDIS funding to exercise choice and control about the workers they employ to provide supports. It would be unacceptable for people with disability and NDIS plan nominees who have the necessary capacity to be prevented from choosing and train their own workers without interference.

People who self-manage their NDIS funds must be afforded the choice to opt out of the registration and accreditation scheme; that is, they should be able to employ workers who

are not registered or worker screened should they choose to do so. The exception would be where a worker is subject to a banning or prohibition order issued either at the national or state level which prevents them from working with people with disabilities.

5.5 Policy and regulatory framework

VALID believes that the Consultation Paper substantively covers the major formal and informal supports regularly used by Victorians with disability, and the common work titles used in the sector.

5.6 Who should the scheme apply to?

VALID believes that a Victorian registration and accreditation scheme should be broad in scope as long as people with disability or NDIS plan nominees who are self-managing NDIS packages either have the option to employ an unregistered worker should they choose, even where the scheme provides for registration of workers without formal disability qualifications who have met the worker screening requirements.

5.7 A broad versus narrow scope

There are significant advantages to a registration and accreditation scheme that is broad in scope. A broad scope would enable all disability sector workers to be covered by a consistent NDIS worker screening process. It would allow the collection of detailed workforce data, and it would improve the quality and breadth of worker training. A broad scope would 'de-couple' worker screening from disability service providers and enable people with no qualifications or irrelevant qualifications and no immediate employment prospects to apply for and be granted registration. It would also improve the financial viability of the independent regulatory body because the larger the registrant base, the lower the registration fees. The fee for base level of registration (worker screened only) should be comparable with the cost of worker screening in other states and territories.

The primary - very significant - risk of a scheme with broad scope would be if it does not allow people with disability and NDIS plan nominees who are self-managing NDIS packages to employ unregistered workers, or it fails to provide registration for that class of worker with good attitudes and values, but without disability qualifications.

A registration and accreditation scheme with broad scope would assist people with disability and their nominees to make more informed choices when recruiting their support workers, via the availability of public information, as well as supporting them to utilise their informal networks in the search for support worker with shared interests and values.

A registration and accreditation scheme with broad scope would strengthen the ability of people wanting to enter the disability workforce by providing a publicly searchable register of qualified and screened workers, and would enable them to undertake worker screening without the requirement to be employed by a disability service provider.

In addition, VALID would suggest that an endorsement mechanism be included so that people can show they have specific skills (e.g. PEG feeding, manual handling) in addition to

a base level of registration, or demonstrated specialist expertise and experience (e.g. allied health professional with disability specific expertise) at a higher level. This is likely to improve the information available to people with disability when implementing their NDIS Plan.

VALID is not supportive of a too tightly targeted registration scheme. A scheme that is targeted to a limited class of workers is more likely to decrease the choice and control of people with disability and plan nominees who self manage their NDIS funding and increase the rigidity of the system. If a targeted approach was taken then the types of workers covered should, at a minimum, include workers in residential care, intimate support workers, people responsible for the development of behaviour support plans and Early Childhood Early Intervention practitioners.

However, registration should be targeted at those classes of worker who provide direct support services and other specialist disability support services. To extend further than this may result in compromising the inclusiveness of mainstream systems. It would be counter-productive to require people in mainstream systems (e.g. Neighbourhood House trainers, taxi drivers, sporting club officials) to be registered.

VALID believes that registration should apply to the front line managers and supervisors of direct support workers and specialist disability support workers. We would also regard registration of those volunteers who are recruited and provided training through specialist disability organisations as best practice, again assuming that a level of registration is available to people without special disability qualifications. Volunteers that emerge through informal support networks (extended family, neighbours etc.) should be excluded from the requirement to register, although voluntary registration should still be available to them should they choose.

5.8 Disability workers registered under other schemes

VALID would prefer that all people whose principal role is working with people with disability are required to specifically register under the proposed disability workforce registration and accreditation scheme. The disadvantages of recognising and registering workers who are already registered under other schemes such as health practitioner registration include a lack of understanding of key disability approaches such as person centred planning and an understanding of the social model of disability. Our experience is that health practitioners are more likely to have a medical model approach to disability and so we would prefer that further disability related professional development and separate registration be required.

Having said this, where workers who are already registered under one statutory scheme also meet the qualification and other requirements for registration as a disability worker, then there should be streamlined administrative arrangements in place to bring these dual qualified workers on to the register of disability workers. This should include, for example, a reduced registration fee for a second registration. If the Regulator's administration were to be co-located with and jointly administered alongside an existing registration/worker screening regulator, these streamlined arrangements should be facilitated. This should reduce red tape and cost and minimise barriers to entry to the disability workforce.

5.9 Worker exemption

Significant worker exemptions would be needed in a registration scheme that demanded a minimum level of qualification (such as Certificate III or IV) to protect the choice and control of people that self-manage their NDIS funding.

It would be preferable for the registration scheme to include a base level of registration for people without qualifications, or with unrelated qualifications, but who have been worker screened, This will reduce the need for worker exemption.

When considering the challenges of thin markets and remote locations, VALID would prefer an approach that uses targeted scholarships and other capacity building measures, rather than worker exemption from the scheme.

5.10 System-wide protections

VALID's submission to the Australian Senate Community Affairs Legislation Committee on the NDIS Amendment (Quality and Safeguards Commission and Other Measures) Bill 2017 specifically recommended that system-wide protections are needed to stop workers excluded from one sector continuing to practise in another. VALID's recommendations included that the powers of the NDIS Quality and Safeguards Commissioner are appropriate to prevent unsuitable people moving between sectors and preying on vulnerable people, and that consideration be given to ensuring that the banning powers the NDIS Commissioner and the prohibition order powers of state and territory Health Complaints Commissioners work in concert so that people banned in the NDIS cannot provide health services or non-NDIS funded disability services, and vice versa.

VALID would strongly endorse information sharing and overlapping powers between different levels of Government and between relevant agencies to embed system-wide protections. We understand (without being experts) that code-regulation and prohibition order powers similar to those under the *Health Complaints Act* would be suitable to provide this safety net. A single national register of banning and prohibition orders would be preferable, regardless of which regulator (state or Commonwealth, health or disability) has issued the orders. VALID understands that work is underway in the health sector to establish an online searchable national register of prohibition orders issued by state and territory health complaints commissioners and tribunals.

11 How should the scheme operate?

VALID believes that a Victorian registration scheme should be voluntary. We believe that there will be a strong uptake of registration, especially if there is a level of registration that recognises workers without formal disability qualifications and if the worker screening function is embedded as the base level of registration rather than operating separately from it. Workers, including those employed by people who are self-managing their NDIS funding, should have the option of seeking to register, whether their employer requires this or not.

5.12 Voluntary registration

VALID strongly supports a voluntary registration scheme and believes that the objectives such as improved safeguards, a quality workforce and better data collection can be met under these conditions. The level of data available from a voluntary system will still greatly

exceed that available currently, while still empowering people with disability to choose their own workers.

VALID would not support a mandatory system that required minimum qualifications for work as a disability support worker and prevented NDIS participants from employing unqualified workers. Mandatory registration would have a substantial negative impact on a self-managed participant's opportunity to exercise choice and control and would seriously constrain the growth of the workforce. There are many situations when it is much more important for a participant to be able to engage a support worker with similar interests and values who then undertakes personalised training. This is true for both people with disability who have the capacity to self-manage and people who have a plan nominee self-managing on their behalf. For people who exhibit behaviours of concern it is often more important that they like and trust a support worker than registration status or qualifications. That is not to argue that qualifications are not important, rather that knowledge and skills are most productive in the hands of workers with the right values and qualities, who are able to respect and connect with the person they are supporting.

A mandatory registration scheme could be a deterrent to people who have skills and capabilities to offer but do not see the disability sector as a short-term employment option (such as university students), or people interested in working part-time (e.g. mothers with young children, university students, older workers), and people with disability who may be one or all of the above.

A mandatory system that sets the NDIS worker screening as the minimum entry requirement at the base level could be considered, although, we believe that workers should not be forced to make their registration details public.

5.13 Reserved titles

VALID does not yet have a strong position on the specific titles that should be reserved for registered workers. We believe that the word 'registered' is essential and that the most likely titles are 'Registered Disability Support Worker' and 'Registered Disability Practitioner' (as per other sectors e.g. Registered Health Practitioner, Registered Building Practitioner). Use of these two titles, with provision for a discipline to be added in brackets (at the discretion of the worker and/or via an endorsement on registration) would allow the NDIS participants and employers to differentiate between registrants with vocational education and training qualifications and those with university qualifications.

5.14 Demand

It is hard to predict whether the current high demand for disability workers will affect participation in a voluntary registration scheme. On the one hand, high demand and a shortage of suitably qualified workers may reduce the incentives to register, while on the other, organisations wishing to promote services as safe for people with disabilities and people familiar with the history of the sector will recognise the professional advantages of registration. VALID believes that a low registration fee associated with a base level of registration that only requires successful NDIS worker screening would minimise barriers to entry to the workforce and facilitate greater uptake of registration.

5.15 Higher risk activities

VALID supports mandatory registration for those responsible for the development of positive behaviour support programs, especially programs that utilise any restrictive practices.

5.16 Regulator powers and functions

VALID does not have specific advice regarding the detail of regulatory powers but would strongly advocate that the Regulator should have the necessary powers to deal with **all** complaints about workers in the disability sector, whether they are registered or not registered.

We would also note that it would be very difficult, and a potential conflict of interest, for the Regulator to simultaneously be responsible for workforce development as well as its quality assurance functions and suggest that these functions be separated. This should not preclude the Regulator collecting and disclosing non-identifying registration data with governments and workforce development agencies, for the purposes of workforce or service development.

5.17 Accreditation powers

The Regulator must have powers to set accreditation standards for programs of study that qualify workers for registration and monitor the performance of those programs against the standards.

This is a critical function of the proposed scheme. For many people in the disability sector, the poor quality of the current training is the reason that they oppose the introduction of a registration and accreditation scheme that might constrain them to employing only those workers who have a Certificate III or Certificate IV in disability. Training for disability support workers requires a complete overhaul and new curricular co-designed with people with disability, their families and allies developed.

VALID's support for a Victorian registration and accreditation scheme is contingent on accreditation powers that will enable a comprehensive review and improvement from the current low standard of disability qualifications.

We also specifically note that strong accreditation powers do not mean the enforcement of mandatory minimum qualifications.

5.18 Disciplinary powers

The Regulator should have the power to immediately suspend registration if it believes there is a threat to public or personal health and safety. It must be able to withdraw registration in situations where there is strong physical evidence of abuse or neglect (e.g. injuries or bruising), but where police do not bring charges because a person with intellectual disability is not regarded as a 'credible witness'. Whilst a threshold for the use of such disciplinary powers is required and principles of natural justice and procedural fairness

must be observed, we note that is currently almost impossible to achieve banning of a worker through the Victorian Disability Worker Exclusion Scheme.

At the same time, protections must be in place for workers against vexatious complainants, as this situation is unfortunately not infrequent in the disability sector.

The Regulator should also have prohibition order (banning) powers similar to those available in the health sector in Victoria.

5.19 Powers to share information

The Regulator should have powers to share information with other regulators (e.g. between disability and health) and Government (state and Commonwealth), and vice versa – noting that the NDIS Q & S legislation needs to include information sharing and joint consideration process where are overlapping jurisdictions.

These ‘joint consideration processes’ need to be articulated to enable agencies with overlapping remits (e.g. NDIS Quality & Safeguards Commission and the proposed Regulator) to jointly determine the best approach to dealing with complaints that fall within both jurisdictions and to ensure oversight issues do not ‘fall through the gap’ between agencies.

The Regulator should have powers to use individual worker data to identify early sign of system failure, for example to provide registration and complaints data to the NDIS Commissioner as an early warning system on provider systems.

5.20 Establishment of the Regulator

VALID does not have a specific position on how the Regulator should be constituted but notes that the solution should be co-designed with people with disability, families of people with intellectual disability, service providers and experienced disability academics and training providers. The Regulator should be constituted in a way that brings together members with the necessary skills and expertise, and should include members who have lived experience of disability, and their families. The Regulator should also constitute reference groups to facilitate routine consultation with people with disability and their carers/families.

VALID would also advocate that the Regulator must regularly publically report – perhaps similar to the Australian Health Practitioner Regulation Agency.

5.21 How should the scheme be implemented?

VALID supports the use of ‘grand-parenting’ provisions to ensure streamlined entry to the register for current disability support workers. We would think that these would need to be in place for around three years from the beginning of the scheme.

VALID supports flexible pathways to registration for workers who do not hold, or have not yet completed, a qualification that the regulator sets for registration.

In order to attract suitable candidates to work in the disability field but are concerned about the cost of study, registration should be available to people entering the disability sector once they have completed worker screening and employer induction. However, they must then complete the study appropriate to their level of registration in a reasonable period. The registration and accreditation scheme must also be structured such that the sector is able to attract appropriate people who do not intend to work in the disability sector for a long time (e.g. university students) and people who would like to work part-time (e.g. mothers with young children).

Training must be able to be tailored so that people with disabilities who would like to specialise in certain types of support work but may not otherwise meet other pre-requisites of a course can attain accreditation in their area of expertise.

Any concerns with the approval multiple pathways to registration (e.g. concern about setting precedents) could be mitigated through mechanisms such as those available for registering health practitioners, that is, different types of limited registration and capacity to place conditions on registration that limit a worker's scope of practice if necessary.

5.22 Recruitment of people with disabilities

The proposed disability workforce registration and accreditation scheme must promote the sector as welcoming to employees with disability. It must model and implement best practice in inclusive training and employment by strongly welcoming and recruiting workers with disability, including workers with intellectual disabilities. As a minimum, the same reasonable adjustments that are available to employees with disability and their employers must be made available as part of the registration process. People with disabilities must also be able to access flexible training that allows them to achieve higher levels of registration in specific areas, without completing a full qualification.

Training subsidies or scholarships for people with disability undertaking accredited training should be made available, especially in thin markets. Surveys conducted at the time of registration renewal could be used to direct targeted training subsidies and scholarships.

5.23 Scheme costs

In order to build the capacity of people with a disability, support agencies themselves need the capacity to engage professional and capable staff. The non-government sector has been historically under-funded and cannot be expected to pursue service excellence without the capacity even to meet basic standards. In order to establish trust and confidence in the funding and management of services, both in the government and non-government sectors, an independent price regulator must be established.

6. Recommendations

- 6.1 The Victorian Government should proceed with the introduction of an independent, legislated registration and accreditation scheme for Victoria's disability workforce
- 6.2 The Victorian Government must urgently review and improve the training of disability workers.
- 6.3 Accreditation of disability training courses must include a requirement that they are designed and developed with people with disabilities and their families and allies.
- 6.4 Disability training courses must be inclusive of people with disabilities, including the ability for people to achieve particular or partial qualifications.
- 6.5 A Victorian registration and accreditation scheme must enable self-managed NDIS participants or plan nominees who are self-managing an NDIS package on behalf of a person with intellectual disability to employ workers who are not registered should they choose to.
- 6.6 The introduction of an independent, legislated registration and accreditation scheme for Victoria's disability workforce may result in additional price pressures. VALID believes this investment will result in high long-term returns and supports the establishment of an independent price regulator.