

Expert Panel
Fair Work Commission
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YWCA Australia's Submission relating to the Gender-based undervaluation – priority awards review: SCHADS Award 2010

Background

1. YWCA Australia ('YWCA') makes this submission in relation to the provisional views of the Expert Panel in the Gender-based undervaluation – priority awards review decision [2025] FWCFB 74 as it pertains to the classifications and minimum wage rates in the ***Social, Community, Home Care and Disability Services Industry Award 2010*** ('SCHADS Award').
2. YWCA is a national not-for-profit organisation that has specialised in supporting women for over 140 years. We are experts in gender-responsive housing and homelessness solutions. Our perspectives are informed by our work as a community housing provider and specialist homelessness support services provider, and our engagement with young women and gender-diverse leaders.
3. YWCA's community housing subsidiary, YWCA National Housing, is a Tier 2 Community Housing Provider with a growing portfolio of 470 social and affordable homes nationally. We provide nearly 125,000 nights of affordable accommodation to women and gender-diverse people every year.
4. YWCA is a leading provider of specialist homelessness and domestic and family violence services. We employ more than 200 staff across 17 locations, many of whom are covered by provisions of the SCHADS Award. In FY 2023-24, YWCA supported over 5,800 people with more than 18,000 hours of direct support.
5. YWCA acknowledges the Commission's assessment that social and community services (SACS) employees, crisis accommodation employees, and home care employees in disability care have historically been subject to gender-based undervaluation. At the same time, we would emphasise the need to ensure any changes to the Award are implemented in a way that avoids unintended consequences for workers, organisations, and the communities that we serve.

Issues

6. The Expert Panel has proposed significant variations to the SCHADS Award, including:
 - a. Abolishing the current five separate classification structures,
 - b. Implementing a simplified classification structure aligned to the Aged Care 'Caring Skills' benchmark, and
 - c. Revoking the Equal Remuneration Order issued in 2012.
7. We respectfully note that equating homelessness work with aged care work risks overlooking the distinct and complex nature of homelessness and family violence services.

8. There is concern across the sector that aspects of the provisional structure could unintentionally exacerbate undervaluation. This risk is particularly acute for specialist homelessness workers currently at Levels 3 and 4 of the SCHADS Award, who may face lower pay progression or restricted mobility.
9. The Commission has acknowledged that translation arrangements are not straightforward and has committed to ensuring no employee's current pay is reduced. However, proposals involving grandparenting and the creation of a two-tier system may result in inequities between current and future employees. Such outcomes would undermine workforce sustainability and create practical challenges for recruitment, retention, and service delivery. This includes potential impacts of a reduced basis for organisational funding tenders. Moreover, potential impacts on organisational capacity to deliver specialist homelessness and domestic and family violence services for vulnerable cohorts such as women and their children facing homelessness due to domestic and family violence.
10. It is noted that the provisional structure seeks to rely more strictly on qualifications as the basis for classification assessment. We respectfully submit that social and community services employees require a diverse range of skills which are built from a nuanced combination of qualifications, on the job training, lived experience and expertise, and community knowledge. For example, there is important cultural expertise of First Nations workers in providing services and supports to Aboriginal and Torres Strait Islander peoples. This is another reason for further consultation to ensure that the Award meaningfully addresses gender-based undervaluation.
11. Finally, there will be significant administrative and financial implications for organisations in re-classifying their workforces. If the new structure is not fit for purpose, these costs risk compounding already high workforce turnover and sector underfunding.

Proposals

12. YWCA acknowledges and welcomes the Commission's commitment to remedying gender-based undervaluation. It is important work ensuring the women-led industries of specialist homelessness services and domestic and family violence services are appropriately valued.
13. We encourage the Commission to proceed with caution in finalising any changes to the SCHADS Award, taking into account the risk of unintended consequences such as pay reductions, inequities between current and future workers, and adverse impacts on workforce sustainability.
14. We respectfully submit that further sector consultation is essential. We encourage ongoing engagement with sector representatives including peak bodies, service providers, and unions to ensure the new classification system is fit for purpose, provides fair pay and career pathways, properly reflects the skills and expertise required across the sector and meaningfully addresses gender-based undervaluation.