



Yfoundations submission to Fair Work Commission Gender undervaluation review – Report to the Expert Panel Conference Process re Social, Community, Home Care and Disability Services Industry Award 2010 (SCHADS Award) (matter AM2024/21)

Background

1. Yfoundations is the peak body for child and youth homelessness in NSW. For over 45 years, Yfoundations has served as the NSW peak body advocating for children and young people at risk of and experiencing homelessness, and the services that support them. We are a membership-based organisation of youth specialist homelessness services (SHS) and stakeholders, with a network of over 50 organisations across the state. Our members and board comprise highly experienced youth SHS providers who have direct knowledge of and experience in and with the sector workforce, in addition to the issues faced by children and young people experiencing homelessness.
2. We are also part of the SHS Sector Workforce Development partnership, a collaboration between the three peaks for homelessness in NSW – Yfoundations, DVNSW and Homelessness NSW – funded by the NSW Department of Communities and Justice (DCJ). This program focuses specifically on developing and delivering projects, resources and support for sector workforce development.

Introduction

3. Yfoundations welcomes the opportunity to provide this additional submission in response to the Alternative Classification Structure for the Social, Community, Home Care and Disability Services Industry Award 2010 (SCHADS Award), released on 19 December 2025.
4. This submission complements our previous submission to the Fair Work Commission's Gender-based Undervaluation Priority Awards Review on 3 September 2025. In making this submission, Yfoundations advocates for the youth homelessness services sector in NSW, which is covered by the SCHADS Award.

Response to Alternative Classification Structure and issues in dispute

5. Yfoundations welcomes the alternative classification structure proposed in Deputy President O'Neill's report to the Expert Panel as a significant and meaningful improvement on the proposal of May 2025, on which Yfoundations provided a submission in September 2025.
6. Overall, we believe the changes in the alternative structure address many of the concerns we raised in that submission and better reflect the skills, experience and complexity inherent in the youth homelessness sector and its work.
7. These changes have improved clarity, restored integrity in critical areas of the current Award, and offer a more reasonable and far less of an impact in the process of implementation of and transition to a new classification structure.
8. Yfoundations wholeheartedly supports the alternative structure in the following areas.
9. We believe that across the 10 levels it proposes, the alternative structure protects the integrity of the rates and pay points in the current Award.
10. The recognition and equivalency of lived experience and relevant industry experience, alongside recognition of qualifications, is of great importance to the youth homelessness services sector.
11. The alternative structure appears to reduce the risk of a two-tier pay structure within organisations, which would have been created under the grandparenting option in the previous proposed classification structure, where current staff would continue to be classified under the current award structure and new staff would be subject to the new structure with lower pay rates.
12. The alternative structure provides clear and fairer career progression pathways in alignment with the current Award.
13. The implementation of a finalised classification structure from July 2027 should allow sufficient time for services, funding bodies and governments to understand, plan for and accommodate changes, which is critical to ensuring service viability, continuity and workforce stability.
14. In response to the issues in dispute concerning any new classification structure which will need to be determined by the Expert Panel, Yfoundations will address those impacting the youth homelessness sector and on which we have commented in our previous submission. On these points, we support the positions already submitted to the Panel by our partner peak organisation, Domestic Violence NSW, one of our member organisations, Southern Youth and Family Services, and Council to Homeless Persons.
15. On issue (2) Whether the entry level for Social and Community Services (SACS) workers should be Level 2 or Level 5: Yfoundations supports an entry level at the proposed Level 5 (equivalent to current SCHADS Level 3). A lower entry point would significantly undervalue the complexity of the work of the youth homelessness sector and community services work generally. This would adversely impact the already critical issues of recruitment and retention in the sector, as discussed in our previous submission.

16. On issue (4) Proposed clause 13.4 – Whether progression for part-time and/or casual employees should be contingent upon a period of full-time equivalent experience: Yfoundations does not support this. In a highly feminised sector like the youth homelessness sector, with a high proportion of part-time and casual roles, and with women more likely to be in those part-time and casual roles, it is imperative, and only fair and equitable, that there is a clear progression pathway for part-time and casual workers to move to the next pay point after 12 months of service. Anything less than this would undermine workforce retention and disproportionately disadvantage women, only serving to reinforce gender-based undervaluation. In addition, it would create an unnecessary administrative burden in an already stretched sector and workplaces.
17. On issue (6) Whether the classification structure should extend coverage to clerical employees in Home Care and Crisis accommodation and supported housing sectors in lieu of the Clerks – Private Sector Award 2020: most definitely. Yfoundations support this proposal.
18. On issue (9) Whether the holding of a qualification must be ‘as a requirement for the performance of their duties by the employer’ at Levels 2–10, only at Levels 6 and 8, or not at all: Yfoundations does not support holding a particular qualification being a requirement for classification at any levels. As stated in our previous submission, the requirement of a qualification brings with it the risk of undervaluing industry experience and lived expertise, and it is possible many sector workers may not hold these qualifications despite being highly trained and highly skilled workers whose performance and outcomes meet, if not exceed, the requirements for those roles. In addition, in the youth homelessness sector, experience and lived experience, and proven capability, are often more relevant – and necessary – than formal qualifications alone. Qualifications must be considered alongside other equally valid and important knowledge bases, including lived experience, cultural knowledge and/or industry experience that is relevant to the requirements of positions, the services provided, the clients and communities being served, and the work carried out.
19. On issue (10) re equivalency of qualifications or experience: Yfoundations supports the definition articulated by the Panel, that is,
- ‘Level X applies to an employee who performs [type of work] and who:*
- (a) has a [X qualification] or equivalent qualification and whose role requires, or involves as a necessary part of the role, performing duties substantially related to the qualification or*
- (b) does not have a [X qualification] or equivalent qualification but:*
- (i) whose role involves as a necessary part, the performance of work of a kind which utilises the same or similar skills, knowledge and experience as a [x qualification]; or*
- (ii) the employer considers the role involves skills, knowledge and/or experience (including through lived experience) of comparable value.’*

Conclusion

20. In conclusion, we thank the Fair Work Commission for its ongoing commitment to improving the SCHADS award and developing the alternative classification structure to that proposed last year. In its final deliberations on the Award, we urge the Fair Work Commission to ensure no roles are faced with pay cuts in the move to the new award.
21. We further maintain the strong position that any welcomed wage increases arising from changes to the SCHADS award must be supported by commensurate increases in core Government funding. This will ensure that youth homelessness services are not placed in the precarious position of being required to absorb wage increases from existing funding envelopes.
22. We also acknowledge that what remains is the need for the Award to deliver better pay outcomes that reflect the value of the work of the sector – not just protect existing rates. We look forward to the Commission's further work in this area.