

Commissioner Alison Roberts
Productivity Commission
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Cc: Catie Bradbear, Inquiry Manager
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Dear Commissioner Roberts,

On behalf of the Victorian Disability Worker Commission (VDWC), we welcome the opportunity to provide feedback on the Productivity Commission (the Commission) Interim report '*Delivering quality care more efficiently*'.

The Disability Worker Regulation Scheme

The Disability Worker Registration Board of Victoria (the Board) and the VDWC are regulators of Victoria's disability workforce and were established under the *Disability Service Safeguards Act 2018 (DSS Act)* to implement the Disability worker Registration Scheme.

The Scheme regulates Victoria's disability workforce, and in doing so seeks to ensure that Victorians with disability receive safe, supportive and high-quality disability services. The Scheme has a broad scope and applies to all disability workers in Victoria, regardless of the source of funding for the service or the setting in which the service is provided. In practice this means that the Scheme regulates Victorian disability workers including those funded through the NDIS, TAC, local councils and other sources, education support staff working in schools with students with disability, and managers of disability workers.

Disability workforce in Victoria

Victoria is home to a large and diverse disability workforce, spanning allied health professionals, support workers, nurses, personal care attendants and community connectors. Through research with RMIT we have estimated the size of the disability workforce in Victoria is at least 155, 000 workers. Of these 105,000 workers comprise the core disability workforce. Of the core disability workforce, 19 per cent of workers had a Certificate 2 or no qualifications. Most workers (32 per cent) had either a certificate 3 or certificate 4. The other segments of the disability workforce outside the core workforce include various allied health and mental health professionals and social and community support workers. We would welcome the opportunity to share more information about the size, location and characteristics of the disability workforce in Victoria.

About the Victorian Disability Worker Commission

The Victorian Disability Worker Commission is an independent body established to better protect people with disability and build a stronger, safer disability sector. It is responsible for the Disability Service Safeguards Code of Conduct, setting the minimum expectations for all workers in Victoria supporting people with disability, and the complaints service. It can accept complaints and notifications, with powers to investigate and ban workers who put people's safety at risk.

Worker registration

In a first across Australia, the Scheme also provides for voluntary registration of disability workers which commenced in July 2021. Registration ensures disability workers meet rigorous standards for safety, skills and professionalism – no matter how they are employed or how their service is funded.

The Board sets standards for this registered workforce and registers and regulates those workers. To be assessed as suitable to hold registration, disability workers must:

- have professional qualifications or relevant work experience or a combination of both
- meet standards in English competency
- comply with standards regarding criminal history
- comply with continuous professional development (CPD) standards of 10 hours per year.

Registration, supported by professional standards and clear codes of conduct, strengthens accountability and provides assurance of competence beyond risk-based screening alone. Investment in a quality registration system that incorporates practice standards, rather than relying solely on criminal history checks or worker clearances, delivers stronger safeguards and improves the safety, professionalism and responsiveness of the workforce

Safeguarding – complaints and reportable conduct

The Commission provides an independent complaints service so anyone can complain about the conduct of a disability worker, whether they are a registered worker or not. All disability workers must comply with the Disability Service Safeguards Code of Conduct, which outlines the obligations of disability workers to respect and uphold the right to safe and quality supports and services.

The VDWC has adopted the same Code of Conduct used by the NDIS Quality and Safeguards Commission, as prescribed by regulation set by the Minister for Disability, ensuring national consistency in expectations of behaviour and practice.

In addition, to the Code, disability workers and employers must notify the Commission of certain conduct that places service users at risk. The Commission and Board can act to resolve complaints and respond to concerns about a disability worker's conduct, as complaints are generally in reference to breaches of the Code of Conduct. The Board and Commissioner can also take immediate action or ban a worker, if needed, where a disability worker's conduct puts people at risk.

Our regulatory experience shows that workforce quality is directly tied to safer and better outcomes for people with disability. Registration, supported by professional standards and clear codes of conduct, strengthens accountability and provides assurance of competence beyond risk-based screening alone. Investment in a quality registration system that incorporates practice standards, rather than relying solely on criminal history checks or worker clearances, delivers stronger safeguards and improves the safety, professionalism and responsiveness of the workforce.

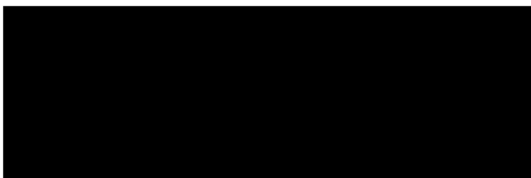
It is our experience that there are specific characteristics of disability which are unique to other care sectors that are critical when considering the practical implementation of regulatory operations in responding to complaints about the delivery of disability services by

the disability workforce. An understanding of disability rights, accessibility, supported decision making and restrictive practices safeguards is required. Reform should support retaining and enhancing a critical mass of these skills in any future regulator.

The VDWC supports reforms that deliver greater national consistency while preserving disability specific safeguards that uphold the rights, choices, and safety of people with a disability.

We look forward to the opportunity to meet with you to discuss our insights on the characteristics of the disability workforce and our experiences regulating all Victorian disability workers over the last five years to inform the final report recommendations.

Yours sincerely,



Dan Stubbs
Commissioner
Victorian Disability Workers Commission

15/09/2025