



Gender Undervaluation – Priority Awards (AM2024/19, AM2024/20, AM2024/21, AM2024/22, AM2024/23)

Submission cover sheet

Name

(Please provide the name of the person lodging the submission)

Madeleine Clark

Organisation

(If this submission is completed on behalf of an organisation or group of individuals, please provide details)

Wesnet

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Priority Award(s):

- Aboriginal and Torres Strait Islander Health Workers and Practitioners and Aboriginal Community Controlled Health Services Award 2020*
- Children's Services Award 2010*
- Health Professionals and Support Services Award 2020*
- Pharmacy Industry Award 2020*

How to prepare a submission

Submissions should be emailed to awards@fwc.gov.au. Directions set out the due dates for submissions. Directions are issued by a Member of the Commission and will be published on the [Gender undervaluation – priority awards review](#) webpage on the Commission’s website.

Make sure you use numbered paragraphs and sign and date your submission.

In your submission, provide a summary of your experience and any relevant issues and proposals. As background, you may wish to review the Commission’s [Gender pay equity research webpage](#), the [Stage 2 report: Gender pay equity research](#), and the [Annual Wage Review Decision 2023-24](#) with particular focus on paragraphs [85]-[132], and [162]-[172].

Background

1. Wesnet is the peak body for specialist domestic and family violence service providers around Australia. Our member services fall under the SCHADs award, as do our staff members.
2. We welcome the work from the Commission to recognize the gender-based undervaluation of community sector expertise, including in the specialist domestic violence space. We appreciate efforts to adequately recognise the work done by services around the country, noting that the majority of work in this space is performed by women. We recognise that many frontline services are not adequately compensated for their expertise, and welcome efforts to address this.
3. Specialist domestic and family violence service providers routinely have multiple sets of knowledge and expertise. This may include expert knowledge of homelessness and/or temporary housing, domestic and family violence, social work, health and psychology, and legal expertise. This knowledge may be additionally supplemented by lived experience.
4. As a result of these complex knowledge pools, specialist workers perform diverse and complex tasks including (but not limited to) undertaking risk assessments, performing ongoing case management, providing legal advice, providing referral pathways to other services, liaising with behavior change and family programs, delivering educational and informational programs, and more. Additionally, many workers rely on distinct cultural knowledge and expertise, including specialist First Nations service providers. Critically, this work is distinct from the tasks performed by Aged Care workers.

Issues

5. We echo the concern shared by the Australian Council of Social Services that there is a serious risk of unintended consequences by rushing the development of a new classification. This is particularly true for the domestic and family violence sector, who face considerable workforce demands. It is worth noting that some of the most in-demand services are those

who possess the distinct cultural expertise that will be challenging to quantify under the proposed classification system.


6. The proposed changes could see many of our member services forced to down-classify highly qualified and experienced practitioners who have no tertiary qualifications. Furthermore, grandfathering the existing staff, and having to run a two-tiered payroll, would be resource-intensive and create financial administrative on-costs to organizations already operating under large resource constraints.
7. Many services will then have the issue of having workers who are doing the same job but paid at different rates because they don't have a formal academic qualification. The 2nd National Plan identifies workforce issues as a major issue for the sector and notes that most specialist DFV workers are training and learning their skills on the job. A newly graduated social worker is nowhere near work-ready compared to a worker with years of practice experience learnt on the job.
8. There is also the concern that many workers will be alarmed at the possibility of a pay freeze, which may be exacerbated by confusion regarding the proposed management levels. However, we believe that this concern can be lessened through further consultation and lead time (see proposals below). We support increased wages for the sector, but emphasise that support during this transition will be critical.
9. Many domestic violence service providers rely heavily on government funding (often at the state or territory level). Money from these government contracts has been allocated under the assumption that the current award rates would continue, with funding often arranged years in advance. Additionally, small service providers will not always have the operational reserves necessary to cover any substantial and unexpected increases in wages. This places services at serious risk of having to eliminate positions, meaning victim-survivors may receive less access to critical support. The staffing hours required to adjust existing contracts and systems to any new award structure is likely to reduce service capacity in the short-term.

Proposals

10. We share ACROSS' view that it is imperative that the Commonwealth, and each State and Territory Government, guarantee funding for the community sector to fund new wage rates and support organisations to transition to any new structure. Additionally, Wesnet recommends that any existing funding be examined to ensure that contracts do not lock in roles at a lower level than is required to fulfil the work required.
11. We recommend ongoing consultation with the sector to allow for substantive discussions with the Commission about the proposed changes, noting that the large-scale nature of the proposed reclassification will impact many groups differently. This additional consultation should seriously consider how cultural expertise can be integrated into any understanding of qualification under the new award.
12. We additionally recommend that the Commission consider targeted briefings (which could be coordinated through relevant groups and peak bodies such as Wesnet) that would allow

individual services to directly ask the Commission questions and gain clarity around any remaining ambiguities.

13. Finally, if the proposed changes proceed, Wesnet recommends reasonable lead time to allow services to transition to the new award to minimize the impact on service delivery. We note that given the serious demands on the workforce the operational requirements of shifting to the new award are likely to reduce service capacity to engage with victim-survivors. We would support a staged implementation process to support organisations through this transition.

Signature: 
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Name: Madeleine R Clark
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Date: 5th September 2025
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