

31 July 2019

Jim Kelly  
Director Health and Return to Work  
SafeWork NSW, Better Regulation  
Department of Finance, Services and Innovation  
Level 5, 92-100 Donnison St  
Gosford NSW 2250

Via email: [kate.podryhula@safework.nsw.gov.au](mailto:kate.podryhula@safework.nsw.gov.au)

Dear Mr Kelly,

***Re: Consultation draft of the Health Care and Social Assistance Sector Plan***

Thank you for the opportunity to provide comment on the consultation draft of the Health Care and Social Assistance Work Health and Safety Sector Plan to 2022 (the draft plan).

NCOSS is a peak body for social and community services (the community sector) in NSW. Our role includes promoting and supporting the development of a strong, independent and innovative community sector. It is through this lens that we provide high-level comment on the draft plan.

It is encouraging to see that both the external stakeholder report and draft plan acknowledge the relationship between characteristics of the operating environment and psychological wellbeing of workers. The issues identified in both the stakeholder report and draft plan, such as limited resources and growing workforce casualisation, are consistent with issues raised with NCOSS by many community sector workers and organisations.

The draft plan could be strengthened by the inclusion of more detail on implementation and how the community sector will be supported and resourced to achieve the outcomes identified. With this in mind I am pleased to provide you with some information on the range of issues currently faced by organisations in the community sector that are likely to impact directly or indirectly on the wellbeing of the workforce.

As you may be aware the community sector in NSW (and elsewhere) is now characterised by constant reform and change. The funding landscape in NSW is undergoing significant reform as many services previously provided by government agencies are transferred to non-government and community-based organisations. Reforms such as the implementation of the Human Services Outcomes Framework, the National Disability Insurance Scheme (NDIS), the 'investment approach', individualised funding packages, data driven decision-making and new commissioning approaches present challenges for many workers and organisations in the NSW community sector.

Changes to funding arrangements and government reforms have also shifted greater responsibility and risk to the sector without commensurate increases in funding and resources.

Unsurprisingly services in NSW are increasingly under pressure and struggling to continue to deliver services in the current environment. Many have lost, or are losing funding, and are

concerned about ongoing viability. The most recent NSW Budget set indexation for many community services at just 1.75 per cent for the 2019-20 financial year, while wages are to increase by 3 per cent. In effect this is another cut to funding for the community sector.

Our member organisations tell us that, in response to shrinking funding but no reduction in performance targets and in the face of growing demand, they have no choice but to consider:

- increasing worker caseloads;
- reducing training budgets and supervision time;
- spending less time supporting clients with complex needs; and
- requiring lone staff to attend remote locations and/or situations where the exact circumstances are unknown despite potential safety risks.

The current operating environment for the community sector in NSW is undermining service sustainability. This is particularly damaging in regional and remote communities, where lack of security of tenure makes it difficult for services to attract and retain skilled staff. This has a real impact on the livelihoods and wellbeing of workers in these communities.

NCOSS supports the development of an industry development plan for the community sector. Such a plan would provide for the growth of a strong, sustainable and innovative community sector and incorporate work, health and safety outcomes for workers.

If you require further information or would like to discuss the above, please contact Director of Policy and Research Anna Bacik on 02 8960 7917 or [anna@ncoss.org.au](mailto:anna@ncoss.org.au).

Yours sincerely,

A handwritten signature in black ink that reads "Joanna Quilty". The signature is written in a cursive, flowing style.

Joanna Quilty  
Chief Executive Officer  
NSW Council of Social Service