



**Council
to Homeless
Persons**

An Award that Works for Victoria's Specialist Homelessness Sector

**Submission to the Fair Work Commission's
gender-based undervaluation review of the
Social, Community, Home Care and
Disability Services Industry Award**

FEBRUARY 2026

Council to Homeless Persons is the peak body representing organisations and individuals in Victoria with a commitment to ending homelessness

Our vision is to end homelessness in Victoria. We work towards this goal through leadership in policy and advocacy, building the capacity of Victoria's homelessness sector, and working in partnership with people who are or who have been without a home.

We work to achieve this purpose through providing leadership in policy development, advocacy, capacity building and working in partnership with people who are or who have been without a home

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Acknowledgement of Country

Council to Homeless Persons (CHP) acknowledges and pays respect to the Traditional Owners of the land and waters on which we live and work. CHP's office is in Collingwood, on the land of the Wurundjeri people of the Kulin nations. CHP works across all of Victoria – the lands of many different Aboriginal people across thousands of generations. CHP acknowledges the pride, strength, and resilience of Aboriginal and Torres Strait Islander people and we pay our respects to Elders, past, present, and emerging. Always was, always will be.

Recognising Lived Experience

Council to Homeless Persons thanks people with lived experience of homelessness who bravely share their perspectives to inform our work. Their knowledge and expertise are vital to understanding homelessness and what it takes to end it. We must hear their voices and act.

Acknowledgement of SHS Workers

Council to Homeless Persons thanks the many SHS workers who contributed to the development of this submission. SHS workers care deeply about the people they support and are keenly invested in ensuring the sector is able to support them. Their perspectives and insight vital to designing the new award.

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Introduction

A poster on the wall of our Collingwood office features a cartoon of an anthropomorphic teacup against a light blue background. It wears a bright smile, and its arms are stuck out at jaunty angles. The caption says: “You can’t pour from an empty cup”. The poster encourages self-care in a sector that is full of complexity, risk, and challenges. Workers in the specialist homelessness sector (SHS) all want to do the best they can for people experiencing or at risk of homelessness, but workers cannot help effectively if they themselves are not cared for. Addressing gender-based undervaluation of SHS workers through the new award is an important chance to address workplace conditions that will support the sector and the people they serve.

Victoria’s SHS workforce provides vital support to some of the most marginalised people in our society. Council to Homeless Persons (CHP) is committed to fostering a thriving sector that ensures homelessness is rare, brief and non-recurring. To achieve this, workers in the sector need to be well supported and recognised for the complex work they do. For too long, the vital and lifesaving work of the SHS has been undervalued.

SHS workers are operating under extreme pressures. Dual cost of living and housing affordability crises are forcing more people than ever before into homelessness, leading to increased demands for services. At the same time, funding is stagnating and Victoria’s severe lack of social housing means many people are unable to find a secure home. Workers are highly skilled, and more qualified than in comparable industries, but they are stretched and experiencing higher rates of workplace-related stress.¹ These poor conditions force many to abandon the sector entirely, costing the sector an estimated \$20 million each year.²

The SHS employs a high proportion of women compared with other sectors. The work is coded as feminine because of its inherently caring and relational nature. The sector has experienced systemic underpayment and undervaluation over the past decades. Workers in the SHS are more likely to be women, part-time or casual, and have additional caring responsibilities outside the workplace. Many workers are, themselves, subject to income stress and housing precarity.³

CHP welcomes the alternative classification proposed in December 2025 as a marked improvement on the proposal of May 2025. Several changes improve clarity and the process of implementation. Added detail about equivalent skills and experience, including lived experience, are useful and appropriate for the SHS. CHP does not comment in this submission on pay rates but does urge the Fair Work Commission to ensure that no roles

see pay cuts as part of the shift to the new award. Despite improvements in the December alternative, there are some outstanding issues identified through the conferencing process which must be addressed to ensure the new award works for the SHS.

Firstly, SHS workers ought to be eligible to be classified under Levels 9 and 10. Their work is complex, and workers manage significant risk. Some workers in the sector use specialised skills to support people and take on managerial responsibilities. Excluding them from Levels 9 and 10 is a regressive step which does not reflect reality and could cause lasting negative impacts to the sector.

Secondly, gender-based undervaluation will only be addressed if there is a clear pathway for part-time and casual workers to progress to the next classification after 12 months, just like their full-time colleagues. In a sector with a high proportion of part-time roles and where women are more likely to be part-time than full time, calendar year-progression is appropriate and equitable.

Finally, there is an outstanding question of minimum requirements for qualifications. As the SHS goes through a process of professionalisation, it is CHP's view that the award is an inappropriate tool to mandate minimum qualifications. Instead, a more flexible award is appropriate given the wide variety of sectors it covers and to allow for a strategic approach to professionalising the SHS.

The new award has the potential to support the SHS at a critical moment where homelessness is at a tipping point. The award is a chance to properly recognise the important and life-saving work of the SHS, after decades of poor pay for difficult work.

Implementing the new award across the SHS sector will require funding for both the administrative transition and increased wages. CHP stands ready to support the sector through this process and will work with the Victorian Government to secure the necessary investment. Without additional funding, there is a significant risk that services will be forced to cut hours or restrict access, meaning more Victorians will be turned away from homelessness services when they need it most.

Dynamics of the Victorian specialist homelessness sector

The specialist homelessness sector provides vital support to people experiencing or at risk of homelessness. Workers support service users to maintain or attain stable housing. They also work with service users to access other necessary supports for intersecting issues.

The Victorian SHS workforce is operating under extremely pressing circumstances. Dual cost-of-living and housing affordability crises are pushing more Victorians into homelessness and making it harder to support people. Service users are increasingly presenting with multiple, intersecting issues, causing additional complexity for SHS workers.⁴ Limited funding for homelessness services and scarce social housing mean workers are often unable to help service users. Homelessness services are often the last safety net for people who have fallen through the cracks of other services.

“Most of our clients have, inevitably, been in touch with other services before they reach us.”

SHS worker

“Workers spend most of their time saying ‘We don’t have the resources to help’ and this is horrific for morale.”

SHS service co-ordinator

There are between 2,500 and 5,000 SHS workers in Victoria, employed by 107 organisations.⁵ The majority of employers deliver a range of social services with specialist homelessness services just one portion of their offering. A small number of organisations in the state are dedicated to homelessness services.

Work in the SHS is diverse. Roles include workers at designated homelessness entry points conducting Initial Assessment and Planning (IAP) with new clients, workers delivering supported temporary accommodation, and case managers supporting people experiencing homelessness. Other workers deliver assertive outreach to connect with rough sleepers who face barriers accessing homelessness services which is often delivered by multidisciplinary teams.

This role diversity reflects that users of homelessness services are many and varied. A significant proportion of people experiencing homelessness have also experienced family violence. Others have concurrent mental health or health challenges. Many find themselves homeless after exiting institutions like out-of-home care or prisons. Increasingly, working households are seeking homelessness assistance – nearly 20 per cent of clients of the SHS were working when they first sought assistance.⁶ None of these concurrent challenges cause homelessness, rather their experience of homelessness is caused by housing unaffordability and the lack of social housing. The presence of mental health, health, and alcohol and other drugs (AoD) challenges among people experiencing homelessness adds complexity to service delivery, especially given the barriers many people face in accessing mainstream services.

“We are seeing increasing occupational violence and aggression over the past 5 years, and this is causing real issues for workers and workforce retention. Other than a bad manager, a key reason people leave is a lack of resources to do their job... We feel crap when we speak with people in need and can't offer anything.”

SHS service manager

Almost 80 per cent of SHS staff are women and in some regions of Victoria, five women are employed in the sector for every man.⁷ Workers in the SHS were twice as likely than those in the Victorian workforce to be caring for a person with disability, health issues, or an elderly person.⁸ Specialist homelessness workers are, on average, more highly educated than the Victorian workforce more broadly.⁹ SHS workers have a Diploma/Advanced Diploma or above at twice the rate of the Victorian workforce.¹⁰ And a quarter of SHS workers held postgraduate qualifications which is 2.5 times the rate of the Victorian workforce average.¹¹ Workplace challenges cause higher rates of anxiety and depression among SHS workers, at twice the rate of the Victorian workforce.¹²

“They can fill their cup every day, but it's drained immediately the next day when they talk to a family and can't offer them anything.”

SHS manager

There is a significant issue with staff turnover and attrition among the SHS in Victoria. Short term contracts, client and work complexity, challenges in managing risk, and the increasing difficulty in achieving secure housing for clients push many workers out of the sector entirely. Staff turnover within the SHS is double that of the Australian Health Care and Social Assistance industry.¹³ Over 20 per cent of new workers in the sector did not stay for longer than a year.

Six out of ten people who leave roles in homelessness organisations leave the sector altogether.¹⁴ The consequences of this movement are severe for organisations, workers who remain in the SHS, and, most importantly, for clients. Changes in staffing can interrupt case management in a sector that is highly relational. The high rates of staff turnover are estimated to cost the sector up to \$20 million a year in the form of extra workload, short staffing, additional training, loss of sector knowledge, and additional staff time spent on recruitment.¹⁵

Limited resources from state and federal governments force workers to do more with less. This leads to rationing of limited brokerage funding, high caseloads, and increased staff burnout. This partly results in an increasing portion of people who seek support leaving empty-handed. In Victoria, over a third of people who approached services (and were recorded in the system) who needed accommodation could not access it.¹⁶

The SHS is a common starting point for new graduates of social work, community services, and related courses. A significant portion of the SHS are new starters – up to a third of all workers according to analysis from RMIT’s Workforce Innovation and Development Institute.¹⁷ The homelessness client group overlaps with many other parts of the social service system, meaning workers are exposed to complex scenarios early and develop broad skills. As a result, there is a common pathway of these new workers moving into different social services sectors to pursue better pay and less complexity. In other sectors, former SHS workers tend to manage less risk and can focus on a single issue rather than balancing many, interconnected ones. Other sectors routinely pay workers more than in the SHS, despite all social services sectors sharing the same award: SCHADS.

Addressing gender-based undervaluation of the SHS workforce is an important factor in creating pay equity and improving outcomes for people experiencing homelessness. Many other changes need to happen to fully address these issues, including:

- investing in preventing homelessness before it starts
- a significant uplift in crisis response, comprising Housing First and assertive outreach
- a sustained investment in building more social housing.

The alternative award is a step forward

The Alternative Classification Structure released in December 2025 is a substantial improvement on the classification structure proposed in May 2025. It includes significant steps forward in addressing gender-based undervaluation of SHS workers.

Recommendation 1

Retain the alternative award as an improvement on the proposed award, subject to amendments outlined in Recommendations 2 - 4

Compared with the April proposal, the December alternative includes more detail about roles and their respective responsibilities. This detail makes the implementation of the alternative clearer for employers and employees. The broad social services sector already sees discrepancies between specialised sectors and even between organisations operating in the same sector, so clearer descriptions for each classification can help address the inequities this causes.

CHP also welcomes the alternative's explicit acknowledgement of skills and experience beyond formal qualifications. Our sector is diverse and includes many skilled workers from a range of backgrounds, so this provision allows for appropriate classification of people according to what they bring to their work, beyond their ability to attain formal qualifications. This provision also supports the expansion of the homelessness lived experience workforce. People with lived experience of homelessness already work in the sector in identified 'lived experience roles' or in conventional roles. Their personal experience of homelessness makes a vital contribution to their work.

“There’s a real shift in the sector about lived and living experience. They may not have a bachelor, but how do we recognise their lived and living experience? For my team, the majority are sitting at diploma level, but many bring lived and living experience to the workplace which is priceless.”
SHS manager

Supported housing workers deserve access to the highest classifications

Specialist homelessness sector workers operate at a high level of skill and manage extreme complexity and risk. They deserve recognition and access to Levels 9 and 10 of the alternative award.

Recommendation 2

Allow crisis and supported housing workers access to classification levels 9 and 10

An outstanding question from the December Report to the Expert Panel is whether crisis assistance and supportive housing workers should have access to classification Levels 9 and 10. Due to the complexity of work and their skill and expertise, many workers in Victoria's SHS are already operating at that level. Excluding them from Levels 9 and 10 would be a regressive and inequitable step that undermines the effectiveness of the sector to support Australia's most marginalised people.

"I have moved through my career through youth homelessness, AoD, youth justice. I think homelessness deals with the most complexity. We are dealing with a housing issue, yes, but we are also looking at family violence, AoD, disability, criminal justice, people exiting various institutions. Trying to single us out as somehow 'less than' other social services sectors is ironic given the complexity we see on a day-to-day basis."

SHS Worker

The specialist homelessness sector includes workers with significant skills and responsibility, including those described under Levels 9 and 10 of the alternative award. Caseworkers in the SHS can specialise as a practice expert, often focusing on supporting a particular cohort overrepresented in the homelessness system or supporting people with concurrent challenges. They are employed as practice experts, operating independently or under limited direction, and supporting specialised teams (per clause A.9.1.a of the alternative award). Like the social services sector more broadly, the SHS relies on experienced staff to manage programs, projects, teams, and services (A.9.1.b). Innovative programs, especially those working with rough sleepers comprise multidisciplinary teams of professionals, as outlined in Level 9.1.b.

This complexity of work is required because of the many and intense intersections between homelessness and other issues, and because people experiencing homelessness experience barriers in accessing support from services. Assertive outreach programs, for example, often include nurses and people trained to support people with mental ill health, recognising the specific needs of that cohort. In these multidisciplinary contexts, SHS practitioners are required to engage as professional equals, bringing specialist expertise, independent judgement and decision-making authority to the mix. Effective multidisciplinary practice depends on SHS practitioners being recognised and resourced as professional peers to health, mental health and AoD colleagues, with comparable responsibility for assessment, planning and risk management.

Level 10 of the alternative award is reserved for workers with managerial responsibility for an organisation, as outlined in clause A.10.1.a. There are workers in the SHS who fulfil these duties in both specialist homelessness organisations and as homelessness service managers in multi-sector organisations.

Excluding SHS workers from the highest levels of the new award would entrench structural undervaluation of homelessness work, even as homelessness increases in Victoria and around the country. Workers manage high complexity and risk, and are operating at a high level. Allowing them access to Levels 9 and 10 is a sensible decision that would ensure equity across the sector and address attrition.

Only calendar year progression addresses gender-based undervaluation

The new award must ensure part-time and casual workers are eligible for progression after 12 months in their roles. Failure to do so would undermine the very aims of the review to address gender-based undervaluation. Implementing progression after 12 months is appropriate to the current state of the sector which has a high proportion of part-time and casual workers.

Recommendation 3

Implement progression after 12 months for part-time and casual staff

The SHS employs a greater proportion of part-time workers than the Victorian average. Some roles are designed this way and 12 months' experience gives people the skills and expertise to deliver that part-time role at a higher level. There is a high proportion of workers with caring responsibilities, meaning part-time roles respond to worker needs and is an issue of equity. In the SHS, more women are more likely to be part-time workers than men, so penalising part-time workers by delaying pay progression undermines the purpose of the review in addressing gender-based undervaluation

“If they make this decision to not put [0.5FTE] part-time people up a grade for 24 months I fear that we will have a two-tier system within the workplace that will impact mental health and wellbeing of workers, and potentially create an 'us and them' situation in the workplace. This could cause more challenges at work and cause psychological rupture. I wonder if that works against Psychological Safety in the workplace? It's potentially difficult for managers to manage this. This decision seems to work against their overall goal for reviewing the SCHADS award in the first place.”

SHS worker

Failing to implement 12 month progression for all workers also risks creating a perverse incentive for employers to preference creating part-time roles and even to split full-time roles in half. For example, an organisation running a homelessness entry point could hire one full time IAP worker with a relevant undergraduate degree. The worker should expect to progress from Level 6.1 to 6.2 after 12 months' service, increasing the organisation's wage bill by \$114.92 per week excluding on-costs. This is appropriate given the worker

has gained experience and additional skills to make their work more effective for service users. On the other hand, the organisation could hire two IAP workers at 0.5FTE each. This approach covers the same hours and case load. However, because these workers are part-time, their progression takes twice as long. Both workers would progress to level 6.2 after 24 months, delivering savings to the organisation in terms of wages. However, splitting roles in this way has disruptive impacts on underemployed staff. Workers have less time to support and manage relationships with service users.

Only implementing calendar year progression will fulfill the purpose of this review in addressing gender-based undervaluation. Doing so provides stability for employers and employees, and contributes to equitable workplace conditions. Calendar year progression is an important tool in addressing workforce attrition from the SHS to other adjacent social sectors.

A flexible award allows for managed professionalisation

The specialist homelessness sector is professionalising, but mandating minimum qualifications through the award is the wrong approach. The award is a blunt and inflexible instrument. Using it to mandate minimum qualifications could undermine the nuanced and careful professionalisation process needed to take care of service users and staff.

Recommendation 4

Do not mandate minimum qualification requirements for any levels

Qualifications are an essential part of moving towards a professionalised specialist homelessness sector and workforce. This maturation of the sector should be encouraged, and the success of this transition means valuing our existing, experienced workers who entered the sector at a time when qualifications were not mandatory.

Introducing changes to the award which mandate minimum requirements to access certain pay points would undermine the professionalisation of the SHS. It risks putting a classification cap on highly experienced workers and forcing them out of the sector entirely, losing their expertise.

“I’ve seen minimum qualifications implemented in other sectors, including in family violence where I used to work. When it comes to practice, it simply does not work. The qualified workforce is just not there, and we had to rewrite the guidelines. This has the potential to cripple the workforce.”
SHS manager

“The biggest thing will be about ensuring there’s flexibility and doing what’s right for the region or the cohort. I’m thinking about people with lived or living experience or Indigenous people who come into the sector and work their way up. There are a lot of ways for people to enter the sector and build their skills over time. They may not have formal qualifications, and I don’t want them to hit a ceiling. There are significant barriers preventing some people from pursuing higher education.”
SHS manager

Rather than using the award to manage staff qualifications, a more effective approach is a workforce strategy to manage the transition. This is already underway.¹⁸ This approach can be more tailored to the various sectors that are covered by the new award, recognising there is significant diversity between them. The workforce strategy has the scope to engage with a range of policy, legislative, and investment levers that contribute to the staffing makeup of the sector.¹⁹ Unlike the award, a workforce strategy can flex to account for the geographic spread of qualified and skilled workers.

“The goal of this review is to address gender-based undervaluation and we already have a problem in our sector with people jumping ship from SHS after 12 months. We are also playing catch up in our sector after decades of undervaluation of the complexity and importance of our work. Why would we put in more barriers in place for pay rises for people?”

Former SHS manager

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**Together we can end
homelessness.**

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