6 February 2026

Deputy President O'Neill
Fair Work Commission
Email: awards@fwc.gov.au

Re: Alternative Classification Structure, Social, Community, Home Care and Disability Services (SCHADS) Award

Dear Deputy President O'Neill

The Association of Children's Welfare Agencies (ACWA) supports the Fair Work Commission's efforts to rectify gender-based undervaluation and simplify the SCHADS Award's complex classification structure. We thank the Commission for its continuing work on this important issue and welcome the opportunity to provide feedback on the Alternative Classification Structure.

About ACWA

We are the NSW peak body representing non-government community organisations that deliver services to children, young people and their families who need support. Our member agencies include organisations providing a range of important services to improve children's safety, including early intervention, family preservation and out-of-home care (OOHC) services. We collaborate with our members, partners, government and non-government organisations (NGOs) and other peaks to advocate for systemic reform to improve the lives of children and young people.

Response to the Alternative Classification Structure

We welcome the Fair Work Commission's Alternative Classification Structure as a significant improvement on the provisional structure of May 2025. We are pleased to note several important changes following the conference process in November and December 2025, including:

- clear role descriptions, with social and community services roles distinguished from aged care and disability support roles
- clear career progression pathways
- recognition of experience as equivalent to qualifications, including lived experience.

Equivalency of experience

We strongly support the inclusion of equivalency descriptors at all classification levels. Skills, knowledge and experience - including lived experience - are highly valued in the child and family sector, often above formal qualifications. This is particularly important for recruiting Aboriginal and Torres Strait Islander employees. We commend the Commission for recognising the importance of experience in the Alternative Classification Structure.

The Association of Children's Welfare Agencies Ltd is a company limited by guarantee registered with ASIC under the Corporations Act 2001 (ABN 24 459 406 828 ACN 629 007 727)

Progression clause 13.4

We are satisfied with the proposed new clause 13.4. We do not believe that progression for part-time employees should be contingent on a period of full-time equivalent experience as this would disadvantage workers in part-time roles, most of whom are women.

Entry level for Social and Community Services workers

We are satisfied with the current proposal that Level 5.1 (current SCHADS Level 3) be the entry point for caseworkers. A lower entry point would minimise and undervalue the complex work that these roles undertake, and would likely exacerbate existing recruitment and retention challenges in the child and family sector. We note that the Alternative Structure provides career pathways for caseworkers and counsellors to be classified into proposed Level 6, 7 or 8 if they have significant experience/specialisation, comprehensive knowledge and work independently. This gives the sector flexibility to offer career pathways that recognise and value skilled workers and will help with recruitment and retention.

Implementation

We recommend that a period of 12 to 18 months be allowed to implement the new Award structure, including time for communication, transition planning, and system and technology updates.

We thank the Commission for this opportunity to submit our views on the Alternative Classification Structure, and look forward to working with the Commission and our members on a staged, timely implementation process.

Yours sincerely

Simone Czech
Chief Executive Officer