



Amaze

Submission to the Disability Worker
Registration Scheme proposed
registration standards
Consultation paper

February 2020



About Amaze



Amaze is the peak body for autistic people and their supporters in Victoria. Established in 1967, today Amaze represents a community of more than 55,000 autistic Victorians in shaping a better future for autism.

Amaze seeks to achieve three key outcomes:

- Community understanding of autism in Victoria increases over time.
- Attitudes and behaviours towards autistic people by the Victorian community (government, private and social sectors) improve over time.
- Opportunities for meaningful participation and valued contribution increase for autistic people.

Amaze works to ensure that the voices of autistic people, their families and carers are at the centre of all that we do.

The development of this submission has been informed by the experiences of autistic people and their families and carers.

About autism

Autism is a neurodevelopmental disability that affects the brain's growth and development. It is lifelong, with traits that appear in early childhood.

Autism facts:

- In 2018, the ABS reported there were 205,200 Australians with an autism diagnosis and a prevalence rate of 3.2% for those aged between 5-14 years (99,300 Australian children). However, the true prevalence of autism in Australia is likely to be much higher given the large numbers of autistic adults who remain undiagnosed.ⁱ
- 85% of Australians have personal contact with an autistic person.ⁱⁱ
- Only 29% of Australians feel they have a good understanding of how to support an autistic person, with only 4% of autistic people and their families agreeing that people in the community know how to support them.ⁱⁱⁱ
- Autism is the largest National Disability Insurance Scheme (NDIS) primary diagnostic group – representing 31% of all participants receiving an individual funding package.^{iv}

Every autistic individual is different and will experience autism in different ways, however the below features are always present in some form:

Challenges in communicating and interacting with other people

- Sharing interests and emotions - this can range from a lack of interaction to wanting to interact, but not knowing how to do it in an appropriate way.
- Using and understanding non-verbal communication, such as body language, eye contact or facial expressions.
- Making friends, maintaining friendships and adjusting behaviour to different social situations.

Sensory processing difficulties

- Being either over- or under-sensitive to sensory stimuli, including sounds, smells, tastes, textures or visual stimuli. Often the same person will be over-sensitive to some things and under-sensitive to others.

Repetitive routines in behaviour interests or activities

- Repetitive speech, movements or use of objects.
- Routines, rituals or resistance to change.
- Interests that are very intense or narrow in focus.

Summary of Recommendations

1. Continuing Professional Development

- Registration standards require minimum hours of continuing professional development, divided into separate categories of mandatory training.
- Registration standards require that all workers undertake training in autism (in a course co-designed with autistic people and their supporters).

2. Scope of practice

- Registration standards require workers to hold prescribed qualifications and levels of education and training to practice in prescribed areas, such as the support of people with disability with complex support needs.
- The Victorian government incentivise workers to obtain specialist skills and registration where markets are currently 'thin'.

3. Accessibility

- In co-design with people with disability and their supporters, the Board create accessible information resources on the registration standards and scheme.
- Fund and promote a public education campaign to inform the public about the registration standards and scheme.
- Ensure information about the registration standards and scheme are widely available through a range of media and organisations.

Introduction

Amaze welcomes this opportunity to respond to the Disability Worker Registration Board of Victoria's *Disability Worker Regulation Scheme proposed registration standards – Consultation paper* ('Consultation paper'). It well documented through recent studies, inquiries and reports that the safety and quality of disability services in Australia and globally is being compromised by poor service coordination and inadequate staff training and resourcing.^v Disability worker skills and knowledge are fundamental to the provision of high-quality support for autistic people.^{vi}

It is difficult to provide a detailed response to the proposed registration standards, without understanding the proposed qualifications and experience that the Board will consider eligible for each registration category. It is also difficult to comment on the scope when the roles undertaken by 'disability practitioner' or 'disability support worker' could be extremely diverse. However, given 31% of NDIS participants currently identify autism as their primary disability, we would like to take this opportunity to comment on two of the key issues raised in your Consultation paper: Continuing professional development and Scope of Practice. We also emphasize the importance of the registration standards being accessible to all people with disability.

1. Continuing professional development

The Disability Worker Registration Board is currently considering setting a registration standard of a minimum of 10 hours per year for registered disability workers commencing in the second registration period.

As recognised in the Consultation paper, there are a range of common training requirements for workers, such as first aid, and there are a range of other professional development areas that workers may wish to undertake, such as epilepsy management or positive behaviour support.

Drawing upon both international and local examples, and the importance of ensuring workers have the breadth and depth of knowledge and skills required to work with people with disability, we recommend that the required minimum hours of continuing professional development be divided into separate mandatory categories of training, each category requiring a certain number of hours.

In Northern Ireland, the Social Care Council requires that social care workers obtain 90 hours of post registration training and learning (PRTL) over five years. Social care managers are required to complete a minimum of 90 hours over 3 year registration period. Social Care workers are required to focus their Post Registration Training and Learning on the five core 'Continuous Learning and Development Standards which are: principles of care, safeguarding, communication, social care skills, and

health and safety. Senior care workers and social care managers respectively have 'supervision & appraisal' and 'leadership and management' as additional standards.^{vii}

Similarly, the Victorian Institute of Teaching, the statutory authority who regulates members of the teaching profession, requires that teachers address at least one 'Australian Professional Standards for Teaching' standard in each of three domains, professional knowledge, professional practice and professional engagement, when undertaking their professional development requirements.^{viii}

The Board should similarly ensure that continuing professional development addresses key established areas of learning. The Board should be required to certify training programs or courses as meeting the requirements of a prescribed area of learning. Relevant organisations, including within the disability, education and workplace sectors should work in partnership to plan, develop and deliver programs and courses that meet the Board's requirements (as per the approach in Northern Ireland). Noting that some disability workers may have a limited level of digital literacy, we would encourage the relevant organisations to engage with disability workers and undertake a learning needs analysis.

Given 31% of NDIS participants identify autism as their primary disability, training in autism (in a course co-designed with autistic people and their supporters) should be mandatory. The Parliamentary Inquiry into Abuse in Disability Services acknowledged the importance of training packages that are specifically developed in relation to the needs of particular groups of people with disability, such as autistic people.^{ix}

The need for workers in relevant disability roles to have adequate training in autism has also been recognised in international regulatory developments in this sector. Legislation is currently being considered in England that would require '*mandatory training on learning disabilities and autism for all health and social care staff undertaking regulated activities in England*'.^x While this Bill is not yet law, it is evidence of an acknowledged need for workers to have adequate training in autism.

As discussed below, the scheme should also incentivise the development of specialist knowledge and skills to meet the needs of 'thin markets', particularly to support people with complex support needs.

Recommendations

- Registration standards require the minimum hours of continuing professional development be divided into separate categories of training, each category requiring a certain number of hours.
- Registration standards require that all workers undertake training in autism (in a course co-designed with autistic people and their supporters).

2. Scope of practice

To ensure safe and high-quality support for all people with disability, a registration standard should prescribe specialist qualifications, education and training to work in certain complex and perceived high-risk areas of care. To ensure that the need for any formal qualifications and training does not dissuade workers from practicing in these areas, incentives should be built into the scheme to encourage specialisation, such as free TAFE courses.

For example, specialist qualifications, skills and registration should be required to work with NDIS participants accessing the complex support needs pathway. Autistic people with complex support needs includes autistic people: whose support needs span multiple domains (i.e. health, mental health, justice etc.); who have high levels on need in one or more area; and/or who are more vulnerable or at a greater risk of vulnerability than the broader autistic community.^{xi}

The lack of adequately trained and skilled disability support workers qualified to work with this cohort is widely recognised and must be addressed to ensure safe and high-quality services are available.

For example, the Disability Services Commissioner's report titled '*A review of disability service provision to people who have died 2018–19*' recently highlighted the importance of adequate and appropriate training for disability workers supporting non-speaking people with disability. It reported that in 2018, 57% of people who died required communication support. It also noted that the number of deaths reported where the person had 'no formal means of communication' more than doubled from 2017-2018 to 2018-2019. The Commissioner concluded disability support workers working with people will communication difficulties or who do not communicate verbally, must be alert to the signs of illness or pain. They also need to be able to recognise need for a communication plan to support the person's communication needs, a central element of promoting their basic human rights.

Despite the high levels of funding available for people with complex needs, many service providers are also unwilling to assist this cohort because of the complexity, challenges and perceived risks involved in meeting their needs. This has been particularly compounded by the absence of any designated service provider/s of last resort, i.e. service providers designated to work with autistic people with the most complex of support needs. Incentives to study in this area and fill this service gap should be prioritised by the Victorian government.

Recommendations

- Registration standards require workers to hold prescribed qualifications and levels of education and training to practice in prescribed areas, such as the support of people with disability with complex support needs.
- The Victorian government incentivise workers to obtain specialist skills and registration where markets are currently ‘thin’.

3. Accessibility

The Board must take a comprehensive approach to ensuring the registration standards, and information about the Disability Worker Regulation Scheme as a whole is accessible to the public and most importantly, people with disability and their supporters.

People with disability and their families and carers must be supported to access plain and easy English information resources about the scheme, the benefits of engaging registered workers and the complaints system, tailored to the needs of different audiences (including autistic people) and capable of reaching vulnerable groups. These resources should be developed in co-design with people with disability and their supporters.

Information must also be made available through a range of media and methods, including the Board’s website and resources promoted by the NDIS and disability organisations. A public education campaign will be required to educate the public about the standard and entire registration scheme.

Recommendations

- In co-design with people with disability and their supporters, create accessible information resources on the registration standards and scheme.
- Fund and promote a public education campaign to inform the public about the registration standards and scheme.
- Ensure information about the registration standards and scheme are widely available through a range of media and organisations.

References

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<http://www.abs.gov.au/ausstats/abs@.nsf/Latestproducts/4430.0Main%20Features752015>.
- ⁱⁱ Amaze 2018. *Strategic Directions to 2040 and Strategic Plan 2018-2021*.
- ⁱⁱⁱ Jones S et al. 2017. Experiences of Autistic People and their Families, Centre for Health and Social Research, Australian Catholic University.
- ^{iv} NDIS 2020. COAG Disability Reform Council Quarterly Report, Q2 2019-2020.
<https://www.ndis.gov.au/about-us/publications/quarterly-reports>
- ^v Review of Disability service provision to people who have died in 2019
- ^{vi} Ibid
- ^{vii} <https://niscc.info/prtl/social-care-worker-prtl>
- ^{viii} Victorian Institute of Teaching, Professional development
<https://www.vit.vic.edu.au/registered-teacher/renewing-my-registration/professional-development>
- ^{ix} Parliament of Victoria 2016. Inquiry into abuse in Disability Services – Final Report. Family and Community Development Committee, pg. 135. Available at <https://www.parliament.vic.gov.au/397-fcdc/inquiry-into-abuse-in-disability-services>
- ^x *Mandatory Training on Learning Disabilities and Autism Bill [HL]* available at <https://publications.parliament.uk/pa/bills/lbill/58-01/035/5801035.pdf>
- ^{xi} Collings, S et al 2016. 'Support planning with people with intellectual disability and complex support needs in the Australian National Disability Insurance Scheme'. Journal of Intellectual & Developmental Disability. 41(3) 272-276; Victorian Government 2019. Victorian Autism Plan. Department of Health and Human Services, December 2019. Available at http://www.statedisabilityplan.vic.gov.au/application/files/5115/7543/9606/1805022_Victorian_Autism_Plan-WEB.pdf