

21 July 2022

Commissioners Catherine de Fontenay and Paul Lindwall
Productivity Commission inquiry into Aged Care Employment
By email: agedcareemployment@pc.gov.au

Dear Commissioners

At Hireup we have been very pleased to be involved in consultations for the Productivity Commission's inquiry into Aged Care Employment, and it was a pleasure meeting you alongside our CEO, Jordan O'Reilly, back in March. I am writing today to correct some factual errors about Hireup that the Commission has published in Mable's submission to your inquiry, which we believe may be important in your deliberations.

As you know, Hireup is a proud employer of disability support workers, and operates using a platform business model. Our submission pointed out all the advantages of being a platform employer in both the provision of quality and safe care, and in offering flexibility and choice to our clients and employees.

Mable's submission erroneously suggests that Hireup is shifting to a contracting model of support services, citing:

"HireUp's recent decision to embrace independent contractors, referred to as 'independent support professionals' who offer services such as support coordination and support advice".¹

While Hireup does offer disability support coordinators under its Navigator service - a free service to build the support capacity of Hireup clients - the two coordinators running this program are full-time *employees*. In early 2021, Hireup briefly piloted a support coordination program using contracted coordinators, but this was abandoned in favour of the current service using Hireup employees. It is important to note that the contractors were not providing hands-on disability support work, in any case.

Mable's submission compounds its error by going on to say:

"This decision by HireUp validates the need for mixed models and will only further increase choice and diversity of services in the sector."²

¹ Mable submission, p 15.

² Mable submission, p 15.

We are concerned that this misinformation has been misconstrued to suggest that Hireup is in favour of a platform model of disability support using contracted support workers, which our own submission, and Hireup's operations, demonstrate that we firmly oppose.

In addition, Mable's submission states that, as Hireup does not insist on specific qualifications for a support worker, our safeguards are not as stringent as those of Mable, which does require certain support worker qualifications.³ This is clearly inaccurate: Hireup is a NDIS-registered provider and, as such, is subject to a whole host of routine checks and audits by the regulator, including NDIS screening of all our workers, as well as adherence to practice standards and the obligations for service quality and safety that flow from being an employer. Mable is an unregistered provider and is not held to any of these standards by the NDIS Commission.

We also wanted to take this opportunity to reinforce our argument *for* a platform employer model, based on the submissions made by other organisations to your inquiry. Like Hireup, many other reputable organisations have concerns about the platform contractor model of disability support.

The Australian Medical Association highlights the lack of transparency in the services offered by platforms like Mable (this is in the context of aged care services, but is equally true in the disability support sector):

"Existing digital platforms connecting consumers to aged care workers lack transparency in the information they provide to older people who engage with them. The platforms do not disclose that they are not accredited to provide aged care services and that they are not required to comply with the Aged Care Quality Standards."⁴

Hireup suggests that most NDIS participants do not understand that the current NDIS Commission requirement to screen workers applies to registered providers only. It is a nationally coordinated system, which sounds comprehensive, but is actually an opt-in screen when it comes to unregistered disability support providers. And, as noted above, none of the other NDIS Commission checks and audits applies to Mable as an unregistered provider. This is certainly not made clear to Mable's clients.

The Health Services Union submission offers a direct comparison of Hireup with Mable⁵ considering, among other things, the employment-related entitlements paid by Hireup to and on behalf of its support workers. The HSU concludes:

³ Mable submission, p 16.

⁴ AMA submission, p 2.

⁵ HSU submission, pp 3-5.

“The HSU submits that on-demand platforms that apply the independent contracting model (such as Mable) institutionalise wage theft.”⁶

Finally, the Centre for Future Work at the Australia Institute argues cogently against a platform contracting model of care:

“As the experience of the NDIS and of adult social care in England show, there are strong incentives for using indirect employment arrangements where care system funding is inadequate to fully meet the costs of care required and service providers’ ability to recruit and retain skilled care workers is limited, and/or where there is opportunity for businesses to maximise profit through avoiding responsibilities and costs of employing workers and ensuring care quality (including worker skills, training and career paths required for building and sustaining a quality workforce).”⁷

The Centre for Future Work succinctly concludes:

“The ‘innovation’ of the crowdwork platform model in publicly-funded care is not in harnessing technology for greater efficiency; rather, it is in adopting a business model that provides competitive advantage by bypassing care and employment regulation.”⁸

Hireup wholeheartedly supports the above sentiments and is pleased to be in consensus with so many of the other organisations participating in your inquiry. We would be pleased to provide any further information that might assist your consideration of these matters, or arrange a meeting to discuss this in further detail at any time if that would assist.

Thank you again for the opportunity to contribute to this inquiry. Australia is facing a critical juncture in the regulation of both the aged care and disability support workforces, and we continue to advocate strongly for an employment model across-the-board.

Yours sincerely

Liam Caulfield

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Hireup

⁶ HSU submission, p 5.

⁷ Centre for Future Work submission, p 3.

⁸ Centre for Future Work submission, p 4.