



3 November 2022

**Submission - Mable Technologies Pty Ltd**  
**5 Year Productivity Inquiry: A more productive labour market**

## **Overview**

Mable is a simple to use online marketplace that enables small businesses to enter the care economy and offers an alternative to traditional aged care at home and disability support models. Mable gives older Australians and people with disability more choice, control and flexibility to shape the care and support they receive in their own home and community. Since inception in 2014, Mable has facilitated more than 11 million hours of care and has more than 11,000 approved and active independent support providers across the country.

At a time of increased cost pressure on taxpayers and the Federal Budget, the Mable platform is tapping into a new and complementary community-based workforce, helping to ensure the economic sustainability of the disability and aged care systems, while also delivering excellent outcomes for clients and support providers with tech, data and community enabled safeguards.

Mable welcomes the Productivity Commission's findings about the benefits of digital platforms in the care economy to empower consumers and improve quality of service.<sup>1</sup>

## **Defining 'gig economy' platforms**

Mable welcomes the Productivity Commission's acknowledgement of the fundamental difference between platforms operating in the 'gig economy'. To provide our perspective, Mable is a horizontal platform and, as such, has a different relationship with the self-employed support workers on the platform than a vertical platform like Uber.

Mable operates as a marketplace where the parties — the self employed support workers and their clients — directly form agreements in relation to the types of services received and the terms. Including rates of payment. Clients, whether older Australians or people with disabilities, have the ability to choose support workers, and the self-employed support workers on the platform have the ability to choose their clients.

In Mable's view, horizontal platforms share the following characteristics:

- Their principal role is to connect consumers and suppliers, offering administrative benefits and appropriate safeguards
- They don't define services
- They don't allocate jobs
- They don't set rates and terms

As such, as acknowledged by the Commission, Mable differs from prominent platforms operating in ride sharing and delivery which exert a higher level of control over workers on their platforms.<sup>2</sup>

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<sup>1</sup> *A more productive labour market*, Interim Report, 5 Year Productivity Review, Productivity Commission, October 2022, p. 69.

<sup>2</sup> *Ibid*, pp. 69 - 70.



## Pay Rates on the Mable Platform

In its Interim Report, the Productivity Commission drew on publicly available data on pay rates for self employed support workers on the Mable platform.<sup>3</sup> Notably, pay rates received on the Mable platform continue to increase across all four categories of work. As of 1 September 2022, these are the current average rates of after platform fees across the four broad service categories on the platform for services including overall averages and averages for Monday to Friday for comparison.

Service category	Average rates for September 2022 after platform fees
Allied health care <sup>4</sup>	\$114 per hour (M-F is \$112)
Nursing	\$57 per hour (M-F is \$55)
Social support and domestic assistance	\$45 per hour (M-F is \$43)
Personal Care	\$48 per hour (M-F is \$46)

As acknowledged by the Commission, all self-employed workers across the Mable platform earn well in excess of the National Minimum Wage. While Mable does not set rates on the platform, there is a minimum contractual rate which serves as a safety net and requires self employed workers are paid a minimum of \$32 per hour. After platform fees, this means self employed support workers receive a *minimum* of \$28.80 per hour. It is important to note that only a small percentage, approximately 10.5 per cent of workers on the platform, earn less than \$40 per hour.

## Self Employed Worker Health and Safety

Mable is strongly committed to safeguarding the health and safety of the self employed support workers on the platform.

In relation to *Information Request 2.3* concerning insurance, Mable has arranged a full suite of insurance cover for self employed support workers on the platform.<sup>5</sup> Through a partnership with Howden Insurance Brokers, the insurance covers all self-employed workers for all work arranged and invoiced through the Mable platform:

- Group General & Products Liability Cover
- Group Medical Malpractice Cover
- Group Personal Accident Cover

The insurance cover is underwritten by Berkshire Hathaway Specialty Insurance Company.<sup>6</sup>

However, sole traders are not generally able to access state based workers compensation schemes. Currently, Mable refers support providers seeking additional insurance cover, such as workers compensation, to Howdens to discuss how they can structure their business to

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<sup>3</sup> Ibid, p. 80.

<sup>4</sup> Includes speech therapists, psychologists, physiotherapists and occupational therapists.

<sup>5</sup> Ibid, p. 88.

<sup>6</sup> *Insurance solutions for Mable support workers*, Howden, accessed 17 October, [link](#).



access workers compensation schemes in their state. Mable supports sole traders having simplified and open access to State based workers compensation insurance schemes.

### Dispute Resolution on digital platforms

In relation to the Productivity Commission's request for information on the issue of dispute resolution, as a horizontal platform Mable's general view is that the parties that enter into an agreement — that is the self employed support worker and their client — are primarily responsible for resolving disputes.<sup>7</sup> As previously discussed, Mable does not determine services, terms, rates or job allocations. However, as a platform operating in the care economy, with clients that are older Australians or people with disability, Mable has an obligation to take steps to safeguard the welfare of clients on the platform.

The self employed support workers operating on the Mable platform operate in a highly regulated part of the economy. In addition to the Code of Conduct for the Mable platform, there are a number of regulations and instruments which generally seek to safeguard clients in the care economy, including the following:

- The NDIS Code of Conduct regulated by NDIS Quality and Safeguards Commission.<sup>8</sup>
- For aged care consumers there is the Charter of Aged Care Rights administered by Aged Care Quality and Safety Commission.<sup>9</sup>
- For nurses and allied health professionals, there are several Codes of Conduct and Standard and Standards of Practice regulated by AHPRA.<sup>10</sup>
- There is also the forthcoming *Code of Conduct for Aged Care* which commences 1 December 2022 and administered by Aged Care Quality and Safety Commission.<sup>11</sup>

Because of the nature of the care economy, the principles of natural justice can be at odds with ensuring appropriate care to, at times, vulnerable clients. As such, in instances where there may be a risk to clients — due to a breach of any of the above instruments where an individual's welfare might be at risk — Mable will suspend or remove individuals from the platform.

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<sup>7</sup> Ibid, p. 86.

<sup>8</sup> *NDIS Code of Conduct*, NDIS Quality and Safeguards Commission, 8 September 2022, [link](#).

<sup>9</sup> *Charter of Aged Care Rights*, Aged Care Quality and Safeguards Commission, 5 September 2022, [link](#).

<sup>10</sup> *Professional standards*, Nursing and Midwifery Board (AHPRA), accessed: 19 October 2022, [link](#).

<sup>11</sup> *Code of Conduct for Aged Care – information for workers*, Aged Care Quality and Safety Commission, 30 September 2022, [link](#).