



# Financial Counselling Sector Submission to the Fair Work Commission Gender-Based Undervaluation – Priority Awards Review (SCHADS Award) – AM2024/21

**Date of submission:** Friday 6 February 2025

## About this submission

We welcome the opportunity to provide a further submission to the Fair Work Commission Gender-Based Undervaluation – Priority Awards Review on the Social, Community, Home Care and Disability Services Industry Award 2010 (SCHADS Review) following the publication of the Report to the Expert Panel published on 16 December 2025. This submission should be read in conjunction with [our previous submission](#) dated 5 September 2025.

This submission is from the following financial counselling peak associations:

- Financial Counselling Australia (FCA)
- Financial Counselling Queensland (FCQ)
- Financial Counselling Victoria (FCVic)
- Financial Counsellors' Association of NSW (FCAN)
- Financial Counsellors' Association of Western Australia (FCAWA)
- Financial Counsellors Association Tasmania (FCAT)
- Financial Counsellors Australian Capital Territory (FC-ACT)
- South Australian Financial Counsellors Association (SAFCA) – incorporating the Northern Territory

This submission has been shaped by the previous input of financial counsellors across the country. The voices of 344 financial counsellors (representing approximately 29% of the national workforce) were included in [our previous submission to the Gender-Based Undervaluation – Priority Awards Review](#). We acknowledge and give special thanks for their input, and passion for the importance of their work in supporting the most vulnerable in society.

In this submission, we focus specifically on the proposed classification of counsellors, including financial counsellors, in the Alternative Classification Structure.

We acknowledge the extensive work undertaken by the Fair Work Commission, the Expert Panel and participating parties, and we welcome the opportunity to provide further clarification on issues that remain unresolved and which, if left unaddressed, risk undermining the intent of the reforms.

**Further questions about this submission can be sent to Amanda Chan, Advocacy Manager at FCVic at [achan@fcvic.org.au](mailto:achan@fcvic.org.au).**

## About financial counselling

Financial counselling is a free, confidential, and independent service. It provides vital help for people experiencing, or at risk of, financial hardship. Financial counsellors are uniquely qualified professionals, specially trained to deal with complex financial matters.

There are 1,170 financial counsellors in Australia, collectively assisting more than 200,000 of the most vulnerable people in Australia face-to-face every year. This includes newly arrived migrants and refugees, family violence victim-survivors, older people, people impacted by gambling harm, and people impacted by catastrophic natural disasters.

Financial counsellors have extensive knowledge in a range of areas of consumer, financial and policy issues including consumer law, credit law, debt enforcement practices, bankruptcy regime, hardship policies and practices in a range of industries, internal and external dispute resolution schemes and government concession frameworks, and other specific areas. Financial counsellors are also highly skilled in working with people experiencing vulnerability in a supportive and empowering framework.

Practising financial counsellors must undertake annual continuing professional development (CPD), supervision and other requirements in order to be eligible for membership of their state or territory financial counselling peak association. Eligibility for membership is a condition of receiving an exemption from licencing requirements set out in the *National Consumer Credit Protection Regulations 2010* and *Corporations Regulations 2001*.

The state and territory peak associations are members of a federated body, Financial Counselling Australia (FCA). Peak associations develop resources, build sector capability, and advocate on behalf of financial counsellors and community members on systemic issues that cause and exacerbate poverty and financial hardship. They work with government, banks, utilities, debt collection agencies and other industries to improve approaches to financial hardship and vulnerability.

## Our commentary

We strongly welcome the inclusion of a clear definition of ‘counsellor’ within the Alternative Classification Structure. The definition explicitly recognises work involving assistance with

financial stress alongside mental health, alcohol and other drug issues, cultural healing and related matters.

This recognition appropriately captures the nature of financial counselling work and reflects the complexity, responsibility and professional expertise required of financial counsellors and the immense contribution they make to increasing wellbeing and health for individuals, and social cohesion for communities.

We further welcome the proposal that counsellors be recognised at senior professional levels within the Award, including:

- **Level 7:** Specialised/Experienced Caseworker/Practitioner or Counsellor
- **Level 8:** Senior Specialist Caseworker/Practitioner or Counsellor
- **Level 9:** Caseworker/Practitioner or Counsellor employed as a practice expert and who operates independently or under limited direction

Taken as a whole, this represents a significant and long-overdue acknowledgment of the professional standing of counsellors, including financial counsellors, and the historically gender-undervalued nature of this work.

## Concerns Regarding Entry Points at Levels 5 and 6

Despite the positive intent of the proposed structure, we are concerned that the operation of Levels 5 and 6, as currently drafted, creates ambiguity and unintended consequences for counsellors.

- **Level 5:** minimum entry point for an employee who is engaged as a Caseworker/Practitioner or Counsellor, unless they otherwise fall within a higher level in these classification descriptors.
- **Level 6:** Caseworker/Practitioners and/or Counsellors can only be classified at Levels 6.1 and 6.2 if they work under direct supervision.
  - Level 6.3 is the minimum entry point for an employee who is engaged as a Level 6 Caseworker/Practitioner and/or Counsellor who operates under general direction only, or an employee who is working as a sole employee.

## Level 5.1 as a Minimum Entry Point

Clause A.5.4 provides that:

*‘Level 5.1 is the minimum entry point for an employee who is engaged as a Caseworker/Practitioner or Counsellor, unless they otherwise fall within a higher level in these classification descriptors.’*

In practice, this provision is problematic and internally inconsistent with the broader structure. Counsellors, including financial counsellors, invariably work under either direct supervision (as a student intern), general direction, or limited direction. There are no realistic circumstances in which a counsellor would not fall within one of these categories.

As a result, Level 5.1 functions as a de facto lower entry point, rather than a transitional or exceptional classification. This creates a real risk that:

- Newly qualified or early-career counsellors, including financial counsellors, will be classified at Level 5 despite performing professional counselling work; and
- Employers may rely on the breadth of Level 5 to avoid classifying counsellors at the appropriate minimum of Level 7, contrary to the stated intent of recognising counselling as senior professional work.

## Misuse of Level 6 Through Supervision Definitions

Clauses A.6.2 and A.6.3 restrict counsellors to Levels 6.1 and 6.2 only where they work under direct supervision, and set Level 6.3 as the minimum entry point where they operate under general direction.

We share concerns raised by the Australian Services Union that these distinctions may be applied inconsistently or opportunistically. In particular, there is a risk that employers may characterise counsellors as working under ‘direct supervision’ or ‘general direction’ in order to place them within Level 6, rather than at Level 7, 8 or 9 where their accreditation, responsibilities and expertise properly belong.

This risk is heightened in a funding-constrained environment and would undermine both workforce retention and the gender equity objectives of the review.

## Recommendations

To address these concerns, we have two key recommendations for amending the Alternative Classification Structure to better reflect the intent of the review, align the SCHADS award with sector-wide expectations regarding professional financial counselling roles, and prevent inconsistent classification across employers.

### **Recommendation 1:**

All qualified financial counsellors are to be classified at a minimum of Level 7, reflecting their accreditation requirements, ethical obligations and the complexity of their work. Level 6 may only apply in clearly defined cases of not-yet-fully-qualified student internship circumstances.

### **Recommendation 2:**

Distinctions in the Alternative Classification Structures between ‘direct supervision’, ‘general direction’, and ‘limited direction’ to be explicitly linked to recognised professional practice benchmarks, such as:

- Attainment of full accreditation or equivalent professional recognition (for example, progression from associate to fully accredited financial counsellor);
- Demonstrated capacity to practice independently;

- Provision of secondary consultation, professional supervision, or specialist expertise to other practitioners.

Practically speaking, the above recommendations would see financial counsellors across the country categorised as follows:

- **Level 6:** Not yet fully qualified student financial counselling intern
- **Level 7:** Qualified financial counsellors (Associate)
- **Level 8:** Qualified financial counsellors (Accredited)
- **Level 9:** Qualified financial counsellors (Accredited, in a senior or specialist practice role)

## Service funding considerations

Further, while we acknowledge that the Fair Work Commission does not have the power to direct governments to increase funding or amend existing service contracts, we strongly urge the Commission and the Expert Panel to explicitly recommend that governments of all levels consider the funding implications of any final decision arising from this review, including through options like a ‘top up’ funding round for existing contracted services.

We note that the most recent round of Federal Government financial counselling service funding agreements is not due to conclude until 2030. Agencies and financial counsellors operating under these contracts must not be disadvantaged by Award changes that are not accompanied by commensurate funding adjustments.

Without corresponding funding and contracting adjustments by Government funders:

- Community service organisations will face significant implementation challenges;
- There is a heightened risk of non-compliance or delayed implementation; and
- The intended benefits of addressing gender-based undervaluation will not be fully realised.

A clear recommendation from the Commission would support sector sustainability and assist governments to meet their obligations as major funders of SCHADS-covered services.

Further, we note that workforce attraction and retention challenges for SCHADS-covered roles, including financial counsellors, are particularly pronounced in regional and remote areas. In other employment frameworks, including the public sector, geographic or remote loadings are used to recognise these additional labour market pressures. While not the primary focus of this submission, we encourage the Commission and the Expert Panel to be mindful of how geographic disadvantage may further compound gender-based undervaluation, and the service funding implications this creates for regionally based services.

## Implementation timelines

We are conscious that there are no confirmed implementation dates for this Alternative Classification Structure, pending a final FWC decision.

We would support an implementation date that provides necessary lead time for governments, funding bodies, and financial counselling agencies to plan for and sustainably implement Award changes, particularly in a sector heavily reliant on government funding.

However, this support is subject to critical safeguards. We emphasise that no financial counsellor should be left worse off at any stage of the transition period. Interim arrangements must ensure that existing classifications, wage rates, and employment conditions are maintained or improved until the full implementation of a minimum Level 7 classification for financial counsellors is achieved.

## In summary

We reiterate our strong support for the recognition of counsellors, including financial counsellors, as professional employees across Levels 7-9 within the Alternative Classification Structure of the SCHADS Award. It represents an important step forward from previous proposals. However, final amendments are required to ensure that this recognition is not diluted in practice through ambiguous entry points and supervision definitions.

We urge the Expert Panel to:

1. Remove the application of Levels 5 and 6 for qualified financial counsellors;
2. Confirm Level 7 as the minimum classification for qualified financial counsellors;
3. Clarify supervision concepts and progression criteria;
4. Recommend that governments address the funding impacts of the final determination; and
5. Ensure that no worker is left worse off during transition and implementation.

We would welcome the opportunity to provide further clarification or participate in any additional consultation processes.