

6 February 2026

By email: awards@fwc.gov.au

Dear Expert Panel,

PeakCare welcomes the opportunity to respond to the Fair Work Commission on the Alternative Classification Structure proposed through the Report to the Expert Panel Conference Process. While the alternative structure improves upon the provisional structure in some respects, we urge the Commission to consider the effectiveness of both proposed structures in addressing gender-based undervaluation. The primary aim of any changes to the award should be to support fair and equitable remuneration for the important work undertaken by women in the sector. PeakCare's positions and concerns in relation to the Commission's provisional determination have been outlined in our submission of 29 August 2025¹ and this letter focuses specifically on the proposed alternative structure.

PeakCare is the peak body representing non-government child and family service providers across Queensland. PeakCare advocates on behalf of organisations delivering child protection, family support, foster and kinship care, and residential care services, with a strong interest in ensuring the Social, Community, Home Care and Disability Services Awards (SCHADS) classification reforms reflect the realities of these workforces and are supported by sustainable funding arrangements.

PeakCare supports the inclusion of stronger pay protection measures in the alternative structure and improvements made in recognising equivalency of qualifications and experience, including lived experience and comparable skills, rather than relying solely on formal qualifications.

However, PeakCare maintains that any transition to a new classification structure will create significant operational and administrative impacts for a sector already facing workforce shortages, short-term contracts, and underfunding. These reforms must be carefully phased in, with sufficient time for providers to undertake role mapping and for governments to adjust contracting accordingly. The significant challenges faced by the residential care workforce in Queensland are outlined in PeakCare's Insights and Opportunities report,² including how changes in worker experience level expectations, qualifications and pay can impact workforce shortages in a sector already under strain. We urge the Commission to consider these flow on impacts carefully in their decision and in supporting effective implementation of changes.

PeakCare emphasises that governments must allocate additional funding to accommodate revised SCHADS rates. Without appropriate funding adjustments, providers may struggle to meet wage requirements, leading to workforce instability. If not properly managed, the new structure may exacerbate staff shortages, reduce the sector's ability to attract and retain skilled workers, and ultimately disrupt essential services relied upon by children and young people.

¹ PeakCare. (2025, August 29). *Submission to the Fair Work Commission: Gender based undervaluation priority awards review (SCHADS Award 2010)*. [PeakCare Submission to the Fair Work Commission Provisional Determination](#)

² PeakCare. (2025, March). *Insights and Opportunities (Summary Report) – Queensland Residential Care Workforce*. [PeakCare-Insights-and-Opportunities-Summary-Report-Final.pdf](#)

PeakCare also emphasises the need for greater clarity and alignment in the proposed classification structure. This is especially important for the Queensland child protection and residential care workforces, where qualification pathways and experience progression differ from those assumed in the structure. For example, current mandatory requirements for residential care workers in Queensland see Certificate IV study being undertaken while in paid frontline work, meaning qualification-based entry points may not accurately reflect workforce realities.

PeakCare would welcome financial modelling across a representative cross section of organisations and roles to ensure the full workforce and service impacts of the final structure are understood and that no unintended consequences arise. This modelling should support a clear understanding of how the proposed award changes will address workforce undervaluation and ensure that both current and future workers receive fair and sustainable compensation for their work.

Yours sincerely,



Estelle Abela
Interim Chief Executive Officer

