

Expert Panel on Gender-based undervaluation
Fair Work Commission
awards@fwc.gov.au

2 February 2026

Dear Expert Panellists,

Re: AM2024/21 – Gender-based undervaluation – priority awards review

Domestic Violence NSW welcomes the opportunity to provide this additional submission in response to the Alternative Award Structure for the Social, Community, Home Care and Disability Services Industry Award 2010 (SCHADS Award), released on 19 December 2025.

This submission complements Domestic Violence NSW's previous submissions to the Fair Work Commission's Gender-based Undervaluation Priority Awards Review, made in [May](#) and [September](#) 2025. It is submitted on behalf of the specialist domestic and family violence sector, who are covered by the SCHADS Award.

Domestic Violence NSW is the peak body for specialist domestic and family violence services in NSW. On behalf of our approximately 200 member organisations, we work to improve policy and legislative responses whilst supporting quality service delivery.

Domestic Violence NSW members represent the diversity of NSW services and workers supporting adults, children, families, and communities impacted by domestic and family violence. Our members include crisis and refuge homelessness services, domestic violence response enhancement, domestic and family violence case management, Aboriginal Community-Controlled Organisations, migrant and refugee organisations, community housing, Staying Home Leaving Violence providers, women's legal services, women's domestic violence court advocacy services, men's behaviour change programs, and women's health services.

We welcome the Alternative Structure for the SCHADS Award and consider it a substantial improvement to the Provisional Determination issued in April 2025. We reiterate our support for the following adjustments:

Protection of pay: We support the introduction of additional classification levels and expanded pay points. These changes provide important safeguards against pay regression and help maintain fair wages for existing and future workers.

We further maintain the strong position that any welcomed wage increases arising from changes to the SCHADS award must be supported by commensurate increases in core Government funding. This will ensure that domestic and family violence services are not placed in the precarious position of being required to absorb wage increases from existing funding envelopes.

Recognition of industry, lived and cultural experience and expertise: We strongly support the introduction of new definitions and clauses that better recognise both industry experience and lived experience, alongside formal qualifications. Specialist domestic and family violence work requires highly developed, relational, experience-based skills that cannot be acquired through qualifications alone. These provisions more accurately reflect the realities of the domestic and family violence workforce and the pathways through which effective practice knowledge is developed.

For further context on the history, unique skills and roles, and the intersection of lived and professional experience in the specialist domestic and family violence sector please see our previous submission to the [*Gender-Based Undervaluation – Priority Awards Review \(Round 2\)*](#).

Outstanding issues

In response to the 13 outstanding issues identified in Deputy President O'Neill's Report to the Expert Panel on 16 December 2025, we affirm the Australian Services Union (ASU) position on the following matters:

Issue 2: The entry level for Social and Community Services (SACS) workers should be Level 5, not Level 2.

Issue 4: We do not support pay point progression being based on full-time equivalent hours, due to the administrative burden and negative gender-equity impacts.

Issue 9: We do not support the holding of a qualification being a requirement for classification at a certain level. Rather, qualifications should be considered alongside other knowledge bases, including lived experience, cultural knowledge and/or industry experience that is directly relevant to the requirements of the position.

Issue 10: We support the proposed definition of equivalency of qualifications.

We further recommend that implementation of any new structure occur after the anticipated work value proceedings to increase the SCHADS Award rates are finalised. This sequencing will help ensure that reforms operate cohesively to advance fair remuneration and workforce sustainability.

In conclusion, Domestic Violence NSW reiterates our support for the Alternative Award Structure (released on 19 December 2025), and for the accompanying measures to safeguard workers' salaries and more appropriately recognise both industry experience, lived experience and cultural knowledge alongside formal qualifications.

Thank you for considering our submission. For more information or to discuss this further, please contact Domestic and Family Violence NSW Policy and Advocacy Manager, Sarah Boyle at sarahb@dvnsw.org.au.

Sincerely,



Delia Donovan
Chief Executive Officer
Domestic Violence NSW