



May 5, 2025

Associate to Justice Hatcher
President of the Fair Work Commission
Email: awards@fwc.gov.au

Dear Associate

Submission to the Fair Work Commission
Re: AM2024/21 Gender Undervaluation Priority Awards Review

I write in relation to the Fair Work Commission's preliminary decision of 16 April 2025 in relation to the SCHADS Award.

The financial counselling sector welcomes the Fair Work Commission's recognition that systemic gender-based undervaluation has shaped how care and community sector work has been treated under modern awards. The Commission's provisional views represent a meaningful step toward addressing this inequality.

We support the Commission's intention, set out in paragraph 397(2), that no worker should experience a reduction in pay as a result of the transition to a new classification structure. At the same time, we wish to highlight concerns about the potential long-term implications for the financial counselling workforce, particularly for new entrants joining the profession under the revised structure.

More than 70% of financial counsellors are women, and over half of the current workforce is employed at SCHADS Level 5, with weekly earnings between \$1,872 and \$1,957. These pay rates reflect the complexity, judgement and responsibility inherent in the role. Financial counsellors support clients in serious financial difficulty, including those affected by domestic and family violence, homelessness, addiction, and natural disasters. Their work involves complex casework, legal and regulatory knowledge, and sustained advocacy across multiple systems.

Under the proposed classification structure, some future entrants to the profession, despite holding the same qualifications and doing the same work as existing employees, may have an entitlement to a lower minimum rate of pay. This is because the adoption of the Caring Skills benchmark rate, and the C1(a) rate will, in some cases, result in minimum rates of pay which are less than the status quo. Examples of this issue are set out in the ASU's submission dated 23 April 2025. This would represent a significant reduction in pay compared to current practice.

We are concerned this may lead to the emergence of a two-tier workforce, where experienced workers are protected through transitional arrangements, while new financial counsellors are placed on significantly lower pay for identical work. This could have negative consequences for workforce sustainability, including recruitment and retention, particularly in rural or high-demand areas, and may be inconsistent with the goals of eliminating undervaluation.

Since there is no higher-level qualification in financial counselling, the Diploma should be recognised as the profession's highest credential for classification purposes, not treated as an entry-level qualification. The current proposal risks limiting career progression.

Financial counsellors carry significant responsibility and provide skilled, multi-layered support to clients in crisis. The sector is governed by a state-based membership framework aligned to nationally consistent standards, including mandatory Continuing Professional Development and professional supervision. This high level of professional accountability should be recognised within the classification structure, both for the existing workforce and for future entrants to the profession.

The financial counselling sector supports the Commission's focus on addressing gender-based undervaluation. However, we remain concerned that the proposed changes, without additional safeguards, could result in lower pay rates for new entrants to a highly skilled, predominantly female workforce.

We encourage the Commission to ensure the transition not only protects existing workers but also supports fair and appropriate pay for those entering the profession in the future.

Yours sincerely,

Dr Dominique Meyrick

A handwritten signature in black ink, reading 'D. Meyrick' in a cursive script.

co -CEO, Financial Counselling Australia

dominique.meyrick@financialcounsellingaustralia.org.au

With the support of the following Financial Counselling State Associations

Financial Counsellors ACT

Financial Counsellors Association of NSW

Financial Counsellors Association of Queensland

Financial Counsellors Association of Tasmania

Financial Counsellors Association of Western Australia

Financial Counselling Victoria

South Australian Financial Counsellors Association (also covering the NT)