

17/04/2025

Ms Sonja Stewart
Deputy Secretary for Ageing and Aged Care
Parliament House
Canberra ACT 2600

Via email AgedCareWorkforceReform@Health.gov.au

Dear Ms Stewart,

Ageing Australia's Response to the **National Worker Registration Scheme for Personal Care Workers (PCWs)**

Ageing Australia is the national Association for aged care providers offering retirement living, seniors housing, residential care, home care, community care and related services.

We represent the majority of service providers, working together to create a sector that empowers older Australians to age with dignity, care and respect.

We advocate for a sector that champions excellence, sustainability and innovation, ensuring our members have the tools, resources and guidance they need to deliver exceptional services.

We are committed to reshaping the future of ageing in Australia by fostering collaboration and driving meaningful change, making it a fulfilling journey.

We appreciate the opportunity to provide feedback on the National Worker Registration Scheme for personal care workers (PCWs). This submission reflects consultation with our members and key stakeholders to ensure the scheme strengthens workforce quality, supports providers, and enhances care outcomes for older Australians.

Introduction

Ageing Australia supports reforms that enhance the quality, safety, and professional standing of the aged care workforce. A well-designed National Worker Registration Scheme for Personal Care Workers ('the Scheme') has the potential to strengthen workforce capability, improve retention and mobility, increase efficiency, and enhance the quality of care for older Australians. However, for it to be effective, the Scheme must be proportional to risk, aligned with related sectors, and responsive to the needs of aged care workers and providers. Poor implementation risks exacerbating workforce shortages and creating unnecessary regulatory burdens and costs.

Ageing Australia

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We urge the Australian Government to conduct a comprehensive review of the current Australian Qualifications Framework for aged care and seek clarity and alignment of the associated micro-credentialing structure. The existing inconsistencies are undermining quality training, workforce mobility, and professional recognition.

A harmonised framework is essential to:

Ensure National Recognition and Core Competencies

Establish uniform, sector-accepted standards that define the core competencies required for aged care roles. This will create a common understanding across jurisdictions and support a professional, skilled workforce.

Support Workforce Mobility and Clear Career Pathways

A standardised framework supports seamless movement for care workers between roles and regions while providing transparent career advancement opportunities. A standardised framework supports seamless movement for care workers between roles and regions while providing transparent career advancement opportunities. This consistency reduces administrative burdens and the need for duplicate onboarding processes.

Value Practical Experience Through Grandfathering Provisions

Recognising that the Certificate III in Individual Support typically requires 12 to 24 months to complete, it is vital to acknowledge on-the-job experience. We recommend that PCWs with at least two years' cumulative direct care experience, whether full-time, part-time, or casual, be fully grandfathered under any new requirements. This approach protects seasoned workers from being unfairly disadvantaged, supports continuity of care, and allows experienced staff to mentor new entrants.

Integrate Training and Regulatory Standards

It is essential that the specific skills, training, and standards for aged care roles are developed within an integrated, overarching administrative framework. Aligning qualifications, regulatory requirements, and workforce expectations will minimise conflicting standards and reduce unnecessary administrative burdens. This streamlining is crucial for efficient workforce planning and better care outcomes.

In summary, a harmonised and robust qualifications framework, together with a flexible, practical approach to training and grandfathering, will underpin the successful implementation of the Scheme. Such a system is critical for addressing workforce shortages, ensuring high-quality care for older Australians, and balancing professionalisation with necessary workforce flexibility.

Our submission presents a practical and forward-thinking vision for the Scheme, informed by the collective insights of Ageing Australia members. We remain committed to working collaboratively with the Department of Health and Aged Care (the Department) to ensure the Scheme meets the evolving needs of our sector, ultimately benefiting both aged care providers and the older Australians they support.

1. Purpose and Overall Objectives

Recommendation 1.1 – Enhance Workforce Quality and Safety

Establish National Minimum Standards

The Scheme should mandate core competencies that every PCW must demonstrate, ensuring a baseline level of technical skill, patient care, and emergency responsiveness. This includes explicit requirements for manual handling, infection control, and person-centered care.

Ensure Integration of Practical and Theoretical Learning

Emphasise the importance of both formal qualifications, continuous learning, and on-the-job experiences so that workers are prepared to manage diverse care scenarios. This dual focus will not only safeguard quality but also reduce risks associated with variable care practices.

Recommendation 1.2 – Promote Workforce Retention and Mobility

Uniform Registration Framework

Develop a single national framework that allows for standardised registration across all jurisdictions, enabling workers to transfer seamlessly between metropolitan, regional, and remote settings.

Clear Career Pathways

Establish tiered registration that recognises different levels of skill and experience. This approach supports career progression and motivates PCWs to pursue further training and professional development.

Recommendation 1.3 – Streamline Compliance and Reduce Administrative Burden

Integrated Verification Systems

Coordinate the Scheme's registration process with existing mandatory checks (e.g., police and NDIS screening) so that there is no duplication of effort. A single, central portal for all compliance verifications will reduce administrative overhead for providers and workers alike.

Simplify Documentation Processes

The design should minimise the need for multiple, fragmented submissions of similar documents, allowing for more efficient workforce planning and ease of verification.

Recommendation 1.4 – Uphold Professional Recognition

Formalise the Professional Status of PCWs

A nationally recognised registration system, supported by a clear Code of Conduct and defined Scope of Practice, will enhance the professional standing of PCWs and build public confidence in aged care services.

Communicate Clear Role Expectations

By setting precise standards and behavioural guidelines, the Scheme will foster a uniform expectation of care quality across the sector.

2. Harmonised Qualifications and Training

Recommendation 2.1 – Establish a Nationally Recognised Qualification Framework

Centralise Qualification Criteria

Anchor the framework on the Certificate III in Individual Support, ensuring that all accredited training programs adhere to nationally agreed standards. Clear benchmarks should cover both academic elements and practical skill components to ensure consistency across jurisdictions.

Standardise Core Competencies

Reinforce the need for a harmonised curriculum that aligns with sector expectations. This recognises the importance of both technical care skills and soft skills such as communication, empathy, and cultural sensitivity.

Recommendation 2.2 – Recognise Practical Experience through Grandfathering Provisions

Grandfathering Clause for Experienced Workers

Recognise on-the-job experience by provisionally registering PCWs with at least two years' direct care experience, so skilled workers remain in the workforce while transitioning through a supported RPL process to obtain full certification.

Flexible Credentialing Pathways

Develop Recognition of Prior Learning (RPL) processes to provide clear, accessible routes for those who have not yet obtained formal qualifications but have demonstrated real-world competence.

Recommendation 2.3 – Adopt Competency-Based and Blended Learning Models

Integration of On-The-Job Training with Formal Education

Develop flexible fit-for-purpose training programs that combine classroom instruction, practical simulations, and supervised work placements to reflect the dynamic environment of aged care.

Clear Distinction Between Mandatory Compliance and Advanced Training

While certain key areas (e.g. infection control, manual handling, and emergency response) must be delivered as mandatory training, additional learning should promote advanced, work-relevant skill development through flexible, competency-based modules.

Transition CPD from Compliance-Based to Meaningful Development

Shift the CPD framework from simply fulfilling mandatory requirements to supporting progressive, work-relevant skill development, which encourages personal growth and continuous learning. This flexible framework should include micro-credentialing, applied training units relevant to daily responsibilities, and opportunities for continuous improvement based on performance outcomes.

Recommendation 2.4 – Define the Role of a Personal Care Worker (PCW)

Establish a Nationally Recognised Definition

Clearly define the role of a PCW by detailing the broad scope of responsibilities including:

- **Direct Personal and Clinical Care:** Provision of hands-on care such as assistance with mobility, hygiene, nutrition, and medication prompting.
- **Emotional and Social Support:** Engagement in activities that promote the well-being and social inclusion of older Australians.
- **Assistance with Daily Living:** Supporting independence and quality of life through personalized care solutions.

A unified definition will help eliminate inconsistencies across jurisdictions, align training and registration standards, and ensure that the public and employers understand the full range of skills expected of a PCW.

Recommendation 2.5 – Fully Fund Training and CPD

3. Secure Government-Funded Training

Ensure full financial support is provided for initial qualifications and ongoing CPD, removing cost barriers for prospective and existing PCWs.

Equitable Access to Training

Funding and additional support mechanisms should be considered to bridge regional gaps, especially in remote or underserved areas, and support culturally and linguistically diverse workers in accessing high-quality training.

Recommendation 3.2 – Recognise Practical Experience through Grandfathering Provisions

Grandfathering for Experienced Workers

Recognise the valuable on-the-job experience of current PCWs by provisionally registering those with at least two years' direct care experience. This ensures experienced staff remain in the workforce while transitioning to formal certification.

Flexible Pathways for Credentialing

Provide an accessible route for workers without formal qualifications to progress, using Recognition of Prior Learning (RPL) mechanisms that are structured, transparent, and non-disruptive.

Recommendation 3.3 – Adopt Competency-Based and Blended Learning Models

Integration of On-The-Job Training with Formal Education

Develop training programs that combine classroom instruction, practical simulations, and supervised work placements. This blended model better reflects the dynamic environments in which PCWs operate.

Competency-Based CPD

Shift from a time-based CPD model to multi-model learning, one that measures skill advancement and real-world application. Training should involve staged, progressive units that support mastery in key areas such as dementia care, trauma-informed practice, and clinical support.

Recommendation 3.4 – Fully Fund Training and CPD

Government-Funded Training Programs

Secure full government funding for initial qualifications and ongoing CPD to eliminate cost as a barrier. This includes subsidies for course fees, training materials, and the financial burden of attending training during paid work hours.

Equitable Access to Quality Training

Ensure that funding mechanisms address regional disparities by supporting providers in remote and rural areas and offering additional financial support for culturally and linguistically diverse (CALD) workers.

4. Professional Standards and Regulatory Oversight

Recommendation 4.1 – Develop a National Code of Conduct and Scope of Practice

Establish Uniform Ethical Standards

Formulate a comprehensive Code of Conduct that mandates ethical behaviours such as respect, integrity, and accountability. This document should guide professional interactions and define acceptable conduct for PCWs.

Clarify Operational Boundaries

Develop a detailed Scope of Practice that specifies the roles, responsibilities, and tasks appropriate for different registration tiers, ensuring that PCWs are deployed according to their skill levels and certifications.

Recommendation 4.2 – Implement a Tiered Registration System

Define Clear Registration Tiers

Create at least three tiers within the registration framework:

- Provisional Tier: For new entrants or those in the process of completing their Certificate III qualification.
- Core Tier: For PCWs who have fully achieved the minimum qualification standards.
- Advanced Tier: For experienced workers with additional skills or leadership responsibilities.

Link Registration to Career Progression

Ensure that each tier comes with defined opportunities for professional development, mentorship, and increased responsibilities, reinforcing the value of continuous learning and practice improvement.

Recommendation 4.3 – Appoint an Independent Regulatory Authority

Dedicated Oversight Body

Establish a statutory body specifically tasked with overseeing the Scheme. This authority should be independent from existing health regulators and focused on the unique needs of the aged care sector.

Transparency and Accountability Measures

The regulatory body should enforce compliance through routine audits, provide clear guidelines for disciplinary actions, and maintain a public register for stakeholder review. This will help build trust in the registration process and ensure that standards are upheld consistently across the sector.

5. Streamlined Digital and Administrative Infrastructure

Recommendation 5.1 – Develop a Centralised Digital Platform

Unified Registration Portal

Construct a centralised, cloud-based portal that facilitates all aspects of the registration process, from initial application and document submission to ongoing CPD tracking. This system should offer an intuitive user interface for both PCWs and employers.

Real-Time Credential Verification

Integrate functionality that provides instant verification of registration status and qualifications, reducing delays in employment decisions and enabling better workforce planning.

Recommendation 5.2 – Leverage Best Practice Models

Learn from Established Systems

Utilise design principles and operational insights from established models like the AHPRA registration system and the NDIS worker screening process. This will help ensure that the digital system is secure, scalable, and user-friendly, and support PCWs working across multiple sectors.

Implement Automation and Data Analytics

Incorporate automation tools and data analytics to minimise manual processing, reduce error rates, and facilitate proactive monitoring of compliance and training uptake.

Recommendation 5.3 – Enhance Data Integration and Monitoring

Interoperability with Existing Databases

Ensure that the digital platform is interoperable with relevant national databases and training systems, allowing for seamless data flow and enhanced reporting capabilities.

Ongoing Monitoring and Reporting

Integrate dashboards and automated alerts into the portal to provide regulators with real-time insights into registration metrics, CPD completion rates, and compliance levels.

6. Implementation Strategies and Transition Planning

Recommendation 6.1 – Initiate a Pilot Program

Diverse Pilot Environments

Launch a 12-month pilot program in a representative mix of metropolitan, regional, and remote settings. This pilot should assess all elements of the Scheme, from digital registration to training and compliance and gather critical feedback from all stakeholder groups.

Structured Evaluation

Implement robust evaluation methods during the pilot, including stakeholder surveys, performance benchmarks, and real-time usage data to identify any issues before national rollout.

Recommendation 6.2 – Employ a Phased National Rollout

Two-Year Transition Period

Introduce the Scheme in phases over a two-year period. During this time, the existing verification processes (such as police and NDIS checks) should operate concurrently with the new system to ensure no disruption of service.

Incremental Integration

Gradually expand the digital platform's functionalities and the regulatory authority's oversight as the system demonstrates reliability and scalability.

Recommendation 6.3 – Establish Comprehensive Stakeholder Engagement

Creation of an Advisory Group

We strongly recommend the formation of a National Worker Registration Scheme Advisory Group, which would include representatives from peak bodies, service providers, training organisations, unions, and consumer groups. This group should meet regularly to review pilot results, advise on refinements, and guide the rollout process.

Transparent Communication Channels

Develop regular communication protocols, such as newsletters, webinars, and workshops, to inform all stakeholders of changes, timelines, and training opportunities during the transition.

Recommendation 6.4 – Implement Robust Monitoring and Evaluation Mechanisms

Routine Audits and Performance Reviews

Schedule regular audits and on-site inspections to ensure that the Scheme complies with established standards and to identify opportunities for improvement.

Feedback Loops and Data-Driven Refinements

Establish secure channels for submitting feedback and implement a system for regularly reviewing performance data, ensuring that the Scheme remains dynamic and responsive to workforce needs.

7. Inclusivity and Support for a Diverse Workforce

Recommendation 7.1 – Enhance Cultural Competency and Tailored Support

Culturally Safe Training Materials

Develop training resources that are sensitive to the cultural needs of First Nations and CALD workers, ensuring that the content is accessible and reflective of diverse care practices.

Flexible Delivery Modes

Offer training and CPD through various formats, such as online modules, blended learning, and in-person sessions—to accommodate different learning preferences and overcome geographical obstacles.

Recommendation 7.2 – Address Digital Exclusion and Logistical Barriers

Targeted Digital Support Programs

For workers in remote areas, provide digital literacy training, access to subsidised devices, and connectivity grants to ensure full participation in the digital registration and training system.

Local Support and Assistance

Develop on-ground registration help desks and offer dedicated support personnel to assist workers with navigating the digital system, particularly in areas where technological infrastructure may be limited.

8. Cost, Funding, and Sustainability

Recommendation 8.1 – Eliminate Financial Barriers for Workforce Participation

Government Funded Registration and Training

Ensure that all fees associated with registration, qualification, and CPD are fully subsidised by the Government. This financial support is crucial to removing cost-related impediments for potential and current PCWs.

Inclusive Funding Strategies

Develop funding models that specifically target low-income and under-represented groups, ensuring that every worker has equitable access to quality training and professional development opportunities.

Recommendation 8.2 – Implement Transparent and Equitable Funding Models

Clear Pricing Structures

Work with the sector and relevant bodies to establish transparent pricing and funding formulas for all aspects of the Scheme.

Consistent National Investment

Ensure that Government funding is allocated in a manner that supports consistent standards across all jurisdictions, addressing any regional disparities and ensuring long-term sustainability.

Recommendation 7.3 – Invest in Long-Term Workforce Development

Continuous Investment in CPD

Secure ongoing financial support not only for initial training but also for advanced CPD initiatives that enable PCWs to build specialised skills over time.

Integrated Funding Mechanisms

Create funding streams that seamlessly support both individual professional development and institutional capacity-building in training organisations, particularly in rural and remote settings.

9. Governance, Accountability, and Feedback Mechanisms

Recommendation 9.1 – Establish an Independent Regulatory Authority

Dedicated Statutory Oversight

We recommend the formation of an independent regulatory body focused solely on the PCW registration Scheme. This entity should have a clear mandate, sufficient resources, and operational independence from other health regulators, ensuring that aged care-specific issues are addressed with the required expertise.

Transparent Decision-Making Processes

Develop clear guidelines for regulatory decisions, including registration, compliance enforcement, and disciplinary actions, to maintain trust and consistency throughout the sector.

Recommendation 9.2 – Develop Robust Feedback and Complaint Mechanisms

Confidential Reporting Channels

Set up secure, accessible channels for PCWs, employers, and consumers to report non-compliance, provide feedback, or raise concerns about the registration process and care quality.

Regular Stakeholder Consultations

Incorporate routine surveys, focus groups, and public consultations to ensure that the regulatory authority remains responsive to the needs and concerns of all stakeholders.

Recommendation 9.3 – Regular Audits and Performance Reviews

Scheduled Compliance Audits

Implement a regular audit schedule, including both desk-based and field audits, to review compliance with the Scheme's requirements.

Performance Metrics and Public Reporting

Develop performance indicators that measure key aspects of the Scheme (such as registration turnaround times, CPD compliance rates, and feedback responsiveness) and publish these metrics regularly to enhance transparency and accountability.

Recommendation 9.4 – Facilitate Transparent Public Reporting

Open Access to Information

Ensure that the results of audits, performance reviews, and compliance statistics are accessible to the public, thereby fostering accountability and enhancing stakeholder trust.

Regular Progress Reports

The independent regulatory body should release quarterly reports detailing the progress of the Scheme's implementation, challenges encountered, and improvements made in response to stakeholder feedback.

Conclusion

Ageing Australia supports the establishment of a fully funded Government supported National Worker Registration Scheme for Personal Care Workers, recognising it as a pivotal element in transforming the aged care sector. This Scheme presents an opportunity to elevate professional standards, ensure the safety and quality of care provided to older Australians, and create a more robust and accountable workforce. Our submission outlines recommendations in several key areas that must be addressed to ensure the Scheme's effectiveness in achieving these goals.

By adopting these recommendations, the Scheme can effectively professionalise the aged care workforce while ensuring diversity, high-quality care, and reducing administrative burdens. This approach will enhance consumer confidence in aged care services and provide a secure, supportive framework for workers to build long-term, rewarding careers. Ageing Australia looks forward to engaging in ongoing discussions with the Department to refine the recommendations and ensure the Scheme addresses the diverse needs of the sector, ultimately improving care outcomes for older Australians.

We look forward to continued collaboration and are available to provide further insights as required.

Yours sincerely