

A national registration scheme to support personal care workers employed in aged care

MENTAL HEALTH COORDINATING COUNCIL

Submission to the Department of Health and Aged Care

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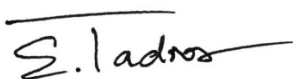
Introduction

Mental Health Coordinating Council (MHCC) is the peak body for community-managed mental health organisations (CMOs) in New South Wales (NSW) and is a Registered Training Organisation (RTO) delivering accredited and non-accredited programs. We represent community-based, not-for-profit/non-government organisations who support people living with mental health challenges. MHCC's 150 members assist people to live well in the community by delivering mental health and psychosocial supports including social inclusion, rehabilitation, and clinical services. Our purpose is to promote a strong and sustainable community-managed mental health sector with the investment, resources, and workforce it needs to provide effective psychosocial, health and wellbeing programs and services to the people of NSW.

MHCC provides policy leadership, promotes legislative reform and systemic change, and develops resources to assist community-based organisations build their capacity to deliver quality services informed by a human rights-based, trauma-informed, recovery-oriented practice approach. MHCC works closely with Mental Health Australia on matters of national interest to the sector, including cross-governmental collaboration, bilateral agreements, and the NDIS. We also collaborate with the Mental Health Alliance, a partnership of state-based peak bodies and professional associations, on matters of mutual interest in NSW.

We welcome the Government's commitment to enhancing the quality and safety of the aged care sector through the implementation of a national worker registration scheme (scheme). We advocate that the skills and competencies required for worker registration include understanding and upholding the human rights of older people, proficiency in using supported decision-making in practice, a commitment to eliminating the use of restrictive practices, and employing a trauma-informed approach to care and practice. We propose that demonstrated adherence to these key principles are embedded in the qualification/s required for registration.

MHCC thank the Government for the opportunity to provide commentary on this significant area requiring urgent reform. We are hopeful that the actions resulting will address the multitude of problems experienced in aged care by service users, workers and employers. We express our willingness to be consulted on any matters related to this submission.



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Consultation Questions:

Section 1. National worker registration scheme design:

What types of approaches, or models, should be considered in the implementation of a national registration scheme to support personal care workers?

The implementation of a national registration scheme for personal care workers involves consideration of several approaches and models to ensure its effectiveness and sustainability. Some important considerations are outlined in the document: [A national registration scheme to support personal care workers employed in aged care: Design and training consultation paper](#), and approaches that could support personal care workers and collectively contribute to a robust and effective national registration scheme ensuring high-quality care could include for example:

- Rolling out the scheme in phases can help manage the transition both for organisations and their existing workers. A staged Implementation allows for adjustments based on consultation with the sector and ensures that both workers and the sector are fully engaged in the process and are ready, and that no-one is left adrift.
- Establishing a registration scheme will require determining the level of competence required and the ratification of a standard minimum qualification, e.g. Cert 3 or Cert 4, Age Care and Support work. A comprehensive training and skills program and requirements are crucial. This includes mandatory training programs, continuous professional development, and certification processes to ensure workers are well-equipped to provide high-quality care and meet the training and skills requirements over a set period.
- Given the overlap between aged care, disability support (including psychosocial disability) and veterans' care, a harmonised approach can promote workforce mobility and reduce regulatory burdens. This can also enhance career opportunities for workers and improve the quality of care across these sectors. Mobile workers can bring additional knowledge and experience to their work and share with other workers.
- Implementing a robust worker screening processes with a clear code of conduct is essential in maintaining high standards of care and protect vulnerable individuals. This includes background checks and adherence to ethical guidelines, and regular ongoing training in alignment with standards.
- Involving a wide range of stakeholders, including qualified personal care workers, aged care providers, training organisations, and recipients of care and their families and kin, in the design and implementation process would ensure that the scheme meets the needs of all parties involved.
- Utilising technology for registration, training, and monitoring can streamline processes and improve efficiency. This includes online training modules, digital certification, and a centralised database for worker registration. However, training must not only be undertaken but proof of knowledge acquired must be demonstrated through certified qualifications that involve assessment processes.
- Providing adequate support and resources for personal care workers, such as access to training materials and career development opportunities, mental and physical health support can enhance job satisfaction and retention, particular when people are undertaking roles that may involve considerable physical exertion and mental stress. Funding allocated needs to factor in the cost of training and upskilling staff by at least 2% of salaries.

1. Should there be a public register where people can see that a personal care worker has met their registration requirements? Why?

MHCC support the establishment of a public register for personal care workers. Workers having met registration requirements can be beneficial for several reasons including building:

Transparency and Trust

A public register allows carers, families and individuals seeking support services to verify the credentials of personal care workers and builds trust in the care provided.

Accountability

Ensuring that personal care workers are held accountable for maintaining their qualifications and adhering to professional standards, enables employers to ascertain the level of knowledge and training a potential employee can demonstrate and help identify people who may not be qualified to provide care.

Safety

By having access to a public register, people can ensure that the care workers employed have undergone the necessary background checks and training, which is crucial for the safety of vulnerable populations.

Professional Recognition

Personal care workers who have met the required standards, should be recognised. Enhancing their professional status will potentially lead to better job opportunities. It would better align the workforce to other workforces across human services, e.g. the mental health and psychosocial disability and other disability workforces.

Regulatory Oversight

Allows regulatory bodies to monitor and enforce standards within the industry more effectively, ensuring a higher quality of care. This could potentially reduce the risk of exploitation of untrained workers, especially from other countries.

Increased effectiveness

When registered workers can utilise their skills and capabilities, where possible to empower people they support, to improve their own personal care skills or capacity to communicate their needs to workers more effectively.

Reduction in Fraud

A registration process will also eliminate rogue providers and fraudulent activity as has been widely reported in the NDIS review.

It is important, however, that any public register is clear on its purpose, who needs to register, whether registering is voluntary or compulsory, and how and by whom it is maintained and cross checked for accuracy.

A legitimate system should bring about a reduction in those being paid cash and still being paid Centrelink for instance, or what we know is happening in relation to modern slavery, where people are at high risk in services such as: cleaning, security, farm work, meat processing, aged-care, on and offshore business process operations, call centres, hospitality and other services¹.

Key factors enabling modern slavery risks to people in this sector include:

- outsourcing to multiple subcontractors
- low-cost bidding for contracts leading to exploitative employment practices
- use of low-skilled labour including migrants and temporary visa holders

Exploitative practices in the sector include underpayment, unfair deductions, unfair dismissal, excessive working hours and compulsory overtime².

2. Should personal care workers be responsible for collecting evidence and providing information to a regulatory/professional body, or should service providers be responsible for collecting and storing information on personal care workers meeting requirements?

- MHCC would like both the individual worker and the service provider/employer to be responsible for collecting and storing registration information about personal care workers. When for example a person has undertaken the appropriate training and has reached the required standards that merit qualification and registration, the professional body must provide the appropriate documentation to the individual. The individual must provide a copy to their prospective or existing employer if they are in transition toward accreditation.
- An employer must be able to check with the professional association the currency of the registration and confirm that the worker has maintained the necessary ongoing training required to maintain their registration over time (e.g. professional development hours per annum).

a. If personal care workers should provide evidence and information to a regulatory/professional body, what should that regulatory/professional body look like?

A regulatory or professional body for personal care workers should have several key characteristics to ensure it effectively oversees and supports the profession:

- The professional body must establish and mandate a set of standards and guidelines for practice thereby ensuring that personal care workers adhere to ethical practice and have qualifications that include knowledge of the standards and their practice.
- The professional body should manage a registration and licensing system, verifying that personal care workers have the necessary training and credentials to provide safe and effective care.
- The body should be responsible for promoting best practice through ongoing education and professional development, offering resources and opportunities for personal care workers to update their skills and knowledge.
- Robust mechanisms for handling complaints and disciplinary actions must be established to maintain high standards of care and address any issues of misconduct.
- The body should advocate for the interests of personal care workers, providing support and resources to help them navigate their careers and improve their working conditions.
- Given the overlap with other care sectors the body should work towards harmonising standards and practices across these areas to promote workforce mobility and consistency in care quality.

b. If service providers are responsible for collecting evidence, what additional support and regulatory approaches would be required?

If service providers are responsible for collecting evidence, several additional support mechanisms and regulatory approaches would be necessary to ensure the process is effective and reliable. This would come at an additional cost and burden to the service provider and would require:

- an efficient data management system, informed by ethical considerations to ensure accurate and reliable information is gathered. Additionally, clear, standardised protocols for evidence collection should be established to ensure consistency and reliability across different providers and settings, and access to appropriate technology and tools for data collection, storage, and analysis will be critical. This includes secure databases, and data analytics software.

- To maintain high standards and identify areas for improvement, regular audits and quality assurance checks should be implemented to verify the accuracy and integrity of the collected evidence.
- A regulatory body should oversee the evidence collection process, ensuring compliance with established standards and protocols, and manage any issues or discrepancies that arise.
- Policies that facilitate the sharing and use of collected evidence while protecting service user privacy and data security are essential. This must include clear guidelines on data ownership, access, and usage rights.
- Encouraging collaboration and communication between service providers, regulatory bodies, and other stakeholders to ensure that all parties are aligned on goals and expectations^{3, 4}.
- Service providers should have access to legal and compliance support to help them navigate complex regulations and ensure they are meeting all legal requirements⁵.

3. Are there any other elements that should be considered for inclusion in a national worker registration scheme (beyond the elements raised in this consultation paper)?

“Minimum education and accreditation requirements can provide the basis for workforce professionalisation to improve workforce stability, support workforce growth and improve care quality. A minimum qualification requirement and opportunity for, and accreditation of, further learning can lead to better recognition of the skilled nature of care work, fairer valuation and reward for this work, and increased job satisfaction”⁶.

In addition to the elements raised in the consultation paper, there are other considerations that could enhance a national worker registration scheme for aged care workers and help to create a more comprehensive and supportive registration scheme that benefits both workers and care recipients including:

- Incorporating mental health and wellbeing support for workers can help address the high-stress nature of aged care work and promote a healthier workforce.
- Providing mental health training in registration qualifications that includes a trauma-informed best practice approach to age care will not only improve the care workers provide to those they support, for enable them to better understand their own mental health and ways to improve self-care in challenging circumstances and minimise vicarious trauma.
- Including Cultural Competency training in registration qualifications would ensure that workers are equipped to provide respectful and effective care to individuals from diverse backgrounds.
- Encouraging the use of technology and innovative practices in care delivery can improve efficiency and quality of care.
- Strategies to improve recognition of work value can provide the basis for pathways to higher-paid jobs and career opportunities. They are a key part of a broader professionalisation strategy that is essential for building workforce stability and growth through increased attraction and retention of workers. Establishing clear career pathways and opportunities for advancement can help retain skilled workers and encourage professional growth within the sector. A registration process that recognises advanced learning would assist in this respect⁷.

- Implementing robust feedback mechanisms where workers can provide input on policies and practices can help improve the system and ensure it meets the needs of both workers and care recipients⁸.

a. Should there be different requirements for personal care workers employed in different settings, for example in-home care versus residential care settings? If yes, why?

MHCC propose that both should be required to register but that there should be different requirements for personal care workers employed in different settings, such as in-home care versus residential care settings, for the following reasons:

- In-home care frequently involves providing assistance with activities of daily living in a more personalised and flexible environment. Workers may need to adapt to the specific needs and routines of individual clients. Further, in-home care can emphasise assisting people to regain functional capacity and improve independence, aiming at full recovery where possible⁹. In contrast, residential care settings require workers to follow more standardised procedures and protocols to ensure the safety and well-being of multiple residents¹⁰. Personal care workers in residential settings may need additional training in areas such as medication administration, emergency response, managing group activities, and best practice pastoral or spiritual care¹¹. In-home care workers might focus more on skills related to individualised care, such as meal preparation, housekeeping, and companionship¹².

4. Should there be consideration of different registration categories including full-registration, and provisional registration if mandatory training, skills, or qualifications are required as part of the personal care worker role? This could include for example, where a worker may be undertaking training, or in cases of demonstrated workforce shortages, with a requirement for a worker to attain full registration within a prescribed timeframe.

- Different settings may have varying regulatory requirements. For example, residential care facilities often have stricter regulations and oversight compared to in-home care services¹³. This can include specific certifications, background checks, and ongoing training requirements. MHCC proposes that in-home care services should lift their requirements to be more stringent, noting the potential for high-risk fraudulence, poor quality of care and modern slavery as referenced earlier (p.3).
- The work environment in residential care settings can be more structured and supervised, with access to a team of healthcare professionals. In-home care workers typically work independently and need to be more self-reliant and resourceful.
- In-home care workers often develop closer, one-on-one relationships with their clients, which requires strong interpersonal skills and the ability to provide emotional support. Residential care workers need to balance individual attention with the needs of the entire group of residents.

These differences highlight the need for tailored requirements and training programs to ensure that personal care workers are well-prepared to meet the unique demands of their respective settings. Registration of workers would need to reflect the different skills required in the different settings.

Considering different registration categories, such as full-registration and provisional registration, can be beneficial for several reasons:

- Provisional registration can help address workforce shortages by allowing workers to begin employment while they complete their mandatory training and qualifications. This ensures that care services can continue to operate effectively even during periods of high demand. However, provisional registration should be time-limited.
- Provisional registration also provides a structured pathway for new entrants to the profession, allowing them to gain practical experience while working towards full registration. This can be particularly useful for individuals transitioning from other sectors or those who are new to the workforce.
- By requiring workers to attain full registration within a prescribed timeframe, the system ensures that all personal care workers eventually meet the same high standards of training and qualifications, maintaining quality of care provided to clients.
- Different registration categories can enhance the professional recognition of personal care workers by acknowledging their progress and commitment to meeting industry standards, and then acquiring additional skills that are recognised. This can improve job satisfaction and retention rates.
- Provisional registration allows regulatory bodies to monitor and support workers as they complete their training, ensuring compliance with standards and providing guidance where needed.

5. Should the elements of a national worker registration scheme be the same across aged care, disability support and veterans' care? If no, which elements should differ and why?

While a harmonised approach to a national worker registration scheme across aged care, disability support, and veterans' care can offer several benefits, there are reasons to tailor certain elements to the specific needs of each sector:

Common Elements

- All sectors should have a baseline training and qualifications to ensure a minimum standard of care and safety.
- Comprehensive background checks should be mandatory across all sectors to protect vulnerable populations.
- A unified code of conduct can help maintain professional standards and ethical behaviour across human services.
- Ongoing training and development opportunities should be available to all workers to keep their skills up-to-date.

Sector-Specific Elements

1. Specialised Training:

- Aged Care: Training focused on geriatric care, dementia management, end-of-life care, restrictive practices, positive behaviour supports, supported decision making (SDM), wellness and reablement.
- Disability Support: Training on specific disabilities, communication techniques, and assistive technologies, restrictive practices and positive behaviour supports, SDM.
- Veterans' Care: Training on dealing with PTSD, physical rehabilitation, and understanding military culture.

2. Regulatory Requirements:

- Aged Care: May require more stringent health and safety regulations due to the higher vulnerability of elderly clients.
- Disability Support: Might need more flexible regulations to accommodate a wide range of disabilities and individualised care plans.
- Veterans' Care: Could include specific requirements related to mental health support and integration with veteran services.

3. Support Services:

- Aged Care: Access to services like palliative care and geriatric specialists as well as support that encourages wellness and reablement.
- Disability Support: Access to occupational therapists, speech therapists, and other specialised support including mental health.
- Veterans' Care: Integration with veteran-specific support services, including mental health and social reintegration programs.

Why Differentiation is Important

- Different populations have unique needs that require specialised knowledge and skills.
- Tailoring elements can lead to more efficient use of resources and better outcomes for clients.
- Allows workers to develop expertise in specific areas, enhancing their career prospects and job satisfaction.

6. What approaches would best support the mobility of workers between aged care and/or other care and support economy employers (for example, an electronic passport that could collect and store registration and skills information)?

Implementing an electronic passport system for care workers could significantly enhance their mobility between aged care, disability support, and veterans' care sectors. Some approaches that could support this are:

Electronic Passport System

An electronic passport could collect and store essential information about a worker's registration, skills, and qualifications. This system would offer several benefits:^{14, 15}.

Centralised Information

- All relevant data, including training, certifications, and work history, would be stored in one place, making it easily accessible to employers across different sectors. For instance, a licence that clears someone to work with vulnerable populations can sit centrally much like Working With Children Checks sits in the Service NSW app for an employee.

Ease of Verification

- Employers can quickly verify a worker's credentials and qualifications, reducing the time and effort required for background checks and onboarding.

Enhanced Mobility

- Workers can seamlessly transition between different care sectors, easily demonstrate their skills and upskill without the need to repeatedly provide the same information. This can reduce barriers to learning and development for employees, and also address national occupational shortages¹⁶.

Continuous Updates

- The electronic passport can be regularly updated with new skills, training, and certifications, ensuring that workers' profiles are always current.

Interoperability and Standardisation

To ensure the effectiveness of an electronic passport system, it is crucial to address interoperability and standardisation:^{17, 18}.

Unified Standards

- Establishing common standards for data entry and storage across different sectors ensures that the information is consistent and easily transferable.

Secure Data Sharing

- Implementing robust security measures to protect sensitive information and ensure that data sharing complies with privacy regulations.

Collaboration

- Encouraging collaboration between regulatory bodies, employers, and training institutions to develop and maintain the electronic passport system.

Challenges and Considerations

Discussions around the introduction of a skills passport have been circulating dating back to 1997¹⁹, further supported by the Australian Government's White Paper on Jobs and Opportunities²⁰ and the introduction of National Skills Passport to ensure lifelong learning and career progression.

While the electronic passport system offers many advantages, there are also possible challenges to consider:²¹

Privacy Concerns

- Ensuring that workers' personal and professional information is securely stored and only accessible to authorised personnel.

Technological Barriers

- Addressing potential issues related to technological infrastructure, especially in regions with limited access to digital technologies to support a cloud-based marketplace through an electronic passport.

Adoption and Training

- Providing adequate training and support to workers and employers to ensure smooth adoption and use of the electronic passport system.

Verification and Ownership

- Ensuring there is clarity on responsibilities i.e. who is responsible for ensuring a copy of a qualification is made available if required, and who is responsible for verifying its authenticity.

Ease and Accuracy of Information

- Ensuring accuracy of training and education information in a concise and accessible way for employees and employers. Passports may be effective for recording accredited training but not necessarily non-accredited learning and development. The passport will need to differentiate between industry specific and industry generic competencies.

Evidence of Need and Cost

- Determining through extensive consultation whether there is a clear and demonstrable need and purpose for an electronic passport that outweighs the ongoing costs, including public funding, and administration of such a system²².

7. What specific barriers are there for First Nations workers, migrant workers, culturally and linguistically diverse workers, regional, rural or remote workers, workers with disability, and workers from low socioeconomic backgrounds?

There are several specific barriers that different groups of workers face:

First Nations Workers

- Less accessible and equitable educational opportunities can limit job opportunities.
- Lack of understanding and respect for cultural differences and cultural safety can create a hostile work environment.
- Persistent stereotyping, racism, bias and implicit and explicit discrimination can hinder employment and career advancement
- Socioeconomic challenges can affect overall well-being and job performance^{23, 24}.

Migrant Workers

- Difficulty in speaking and understanding English can limit job opportunities and meaningful participation.
- International qualifications and work experience may not be recognised, forcing skilled workers into lower-paying jobs, including those who are trained in priority skill occupations to address workforce shortages in Australia.
- Migrant workers often face discrimination and exploitation in the workplace.
- Navigating visa requirements and legal documentation can be complex and stressful^{25, 26, 27}.

Culturally and Linguistically Diverse Workers

- Language differences can lead to miscommunication and errors.
- Lack of understanding and respect for cultural differences and cultural safety can create a hostile work environment including misunderstandings and conflicts.
- Workers may feel isolated and undervalued if they cannot effectively communicate with colleagues.
- Lack of awareness of employee rights and responsibilities that can result in unfair and even illegal employment arrangements, making CALD workers more vulnerable.
- Inability to understand safety instructions can increase the risk of workplace accidents^{28, 29}.

Regional, Rural, or Remote Workers

- Fewer job opportunities in remote areas can limit career growth.
- Limited access to training and professional development opportunities.
- Poor infrastructure, including internet connectivity and technical advancement, can hinder remote work.
- Isolation and limited access to healthcare and support services can affect overall well-being and job performance^{30, 31, 32}.

Workers with Disability

- Inaccessible physical environments can limit job opportunities and performance.
- Negative attitudes and stereotypes about disability can hinder employment.

- Employers may be unwilling or unable to provide necessary accommodations to support employees.
- Difficulties in communication can limit job performance and meaningful participation^{33, 34}.

Workers from Low Socioeconomic Backgrounds

- Less accessible and equitable educational opportunities can limit skill development and career readiness.
- Lack of financial resources can limit access to appropriate attire, transportation, and further education.
- Limited access to and meaningful participation in professional networks and mentorship.
- Unpaid Internships: Economic constraints can make it difficult to take on unpaid internships that are often required for career advancement^{35, 36}.

a. If barriers exist, what kinds of additional elements or supports for these workers need to be considered in the implementation of a national worker registration scheme?

To effectively support these diverse workers, a national worker registration scheme should include tailored elements and supports that ensure people have equitable opportunities to succeed, including:

First Nations Workers

- Ensure that all staff undergo cultural competency and cultural safety training to understand and respect First Nations cultures and practices.
- Engage with First Nations communities and Elders to co-design the registration process and support services.
- Provide flexible training options that accommodate cultural obligations and remote locations.

Migrant Workers

- Offer more accessible and no-cost language classes and translation services to help migrant workers overcome language barriers.
- Implement processes to recognize and validate international qualifications and work experience and provide pathways to further study.
- Enforce strict anti-discrimination and other workplace policies to protect migrant workers from exploitation and unfair treatment.

Culturally and Linguistically Diverse Workers

- Provide interpreters where possible and translated materials to ensure clear communication.
- Promote cultural awareness training for all employees to foster an inclusive workplace.

Regional, Rural, or Remote Workers

- Provide online training and professional development opportunities to overcome geographical barriers.

8. What impacts will a national worker registration scheme have on aged care providers? Other providers of care and support services?

Note: Answers to this question are generally covered earlier in this submission on page 3. Therefore, we briefly reiterate that implementing a national worker registration scheme will have several impacts on aged care providers and other providers of care and support services such as:

Aged Care Providers

- The scheme will ensure that all workers meet minimum standards of training and qualifications, leading to higher quality care for those they support.
- Not only will registration help to professionalise the workforce but will provide clearer career pathways and opportunities for further training and development.
- Providers will benefit from increased accountability and transparency, as registered workers will be held to a consistent code of conduct, training requirements and ethical standards.
- The scheme will streamline regulatory compliance, making it easier for providers to ensure that their staff meet all necessary requirements.
- A harmonised registration scheme across different care sectors will facilitate workforce mobility, allowing providers to more easily hire workers with verified credentials from other sectors and address workforce shortages.

Other Providers of Care and Support Services

- The scheme will create consistency in training and standards across aged care, disability support, and veterans' care, ensuring that all workers are equally qualified and equipped with the necessary skills and knowledge required by the industry.
- Providers will have access to a larger pool of qualified workers with both general and specific skill competencies, making recruitment easier and more efficient.
- With standardised training requirements, providers may see a reduction in training costs as some workers may already possess the necessary qualifications, although ongoing training and refreshers are always desirable.
- The scheme will help improve service delivery by ensuring that all workers are adequately trained and adhere to best practices across the service system.
- The scheme can include tailored supports for diverse groups of workers, helping providers to better support and retain a diverse workforce.

Challenges and Considerations

- There may be initial costs associated with implementing the scheme, including training and administrative expenses along with ongoing maintenance costs.
- Providers will need to manage the transition period as the scheme is rolled out, ensuring that current workers meet the new requirements.
- Maintaining compliance with the scheme's requirements will require ongoing effort and resources from providers and require obligations on the part of workers to ensure timely completion of registration requirements.
- Whilst challenges certainly exist, the benefits of a national worker registration scheme in terms of improved quality of care, professionalisation of the workforce, and enhanced recruitment and retention are significant.

Section 2. Training requirements:

- 9. Should there be an amount of continuing professional development hours that need to be undertaken and/or should there be a specified skill sets, subjects, or shorter non-accredited training (for example, micro-credentials) to choose from?**

Incorporating continuing professional development (CPD) hours and specified skill sets, subjects, or shorter non-accredited training (such as micro-credentials) can be highly beneficial for aged care workers:

Continuing Professional Development (CPD) Hours

- Regular CPD ensures that aged care workers stay up to date with the latest best practices, technologies, standards and regulations in the field ³⁷.
- CPD provides opportunities for workers to enhance their skills and knowledge, leading to improved quality of care³⁸.
- It also supports career progression by allowing workers to gain new qualifications and specialisations ³⁹.
- CPD can also ensure that workers are meeting minimum requirements of ongoing learning that is current and in line with the latest evidence-based practice. Meeting minimum CPD hours, including achieving certificates and badges, can provide incentive to workers to remain engaged in their own skill and career development and the quality of service they are providing.

Specified Skill Sets and Subjects

- Targeted training for specified skill sets and subjects ensure that workers receive training in areas critical to their roles, such as dementia care, mental health, palliative care, and infection control ⁴⁰.
- Establishing a standard set of skills and subjects across tertiary and higher education programs helps maintain a consistent level of foundational care across the industry and between a range of courses ⁴¹.
- Workers developing expertise in specific areas, can be particularly beneficial for addressing the diverse needs of aged care residents⁴².

Non-Accredited Training (Micro-Credentials)

- Micro-credentials offer flexible learning options that can be completed in shorter time frames, making it easier for workers to fit training into their schedules ⁴³.
- These courses can focus on specific skills or knowledge areas, providing targeted and practical training⁴⁴.
- Non-accredited, micro-credentials can still be recognised by employers as valuable professional development⁴⁵.

Implementation

- Establish a minimum number of CPD hours that workers must complete annually to maintain their registration.
- Create a list of approved training providers and courses for formal tertiary and higher education to ensure the quality and relevance of the training.
- Implement a system for tracking and reporting CPD hours and completed training to ensure compliance.

- a. **If there are set skill sets, subjects, or other shorter non-accredited training, what specific areas of skills and knowledge should be considered?**

Training would be useful in the following subject areas:

Mental Health Coordinating Council

- Understanding Mental Health
- Connecting Physical and Mental Health
- Understanding Medication

- Introduction to Trauma-informed Practice
- Self-Care and Vicarious Trauma
- Responding to Risk of Suicide
- Understanding and Responding to Trauma
- Responding to Voices
- Recovery-Oriented Practice
- Provide Leadership Across the Organisation
- Supported Decision-Making

ADC Ageing & Disability Commission

- Domestic Family & Sexual Violence (older Women focus) (to be launched July 2025)
- Responding to Abuse and Neglect

b. Are there existing training options that would be suitable for meeting ongoing personal care worker training requirements? If so, what are these?

Examples of organisations providing a range of suitable learning modules both PD and accredited these courses listed above and more linked below:

- [Mental Health Coordinating Council](#) - accredited and PD
- TAFE - Certificate III in Individual Support (Ageing and Disability) and Certificate IV in Ageing Support
- [Department of Health & Aged Care.](#)
- [Age Care & Quality & Safeguards Commission](#)
- [Ageing & Disability Commission](#)

c. Should the training expectations be directed by the individual personal care worker reflecting on their own training needs?

Individual workers should always be offered the opportunity to identify the training that they feel will enhance their practice and further support their personal growth and confidence. Allowing individual personal care workers to reflect on their own training needs can be beneficial, but it should be balanced with guidance from employers and regulatory bodies.

Some benefits of self-directed and guided learning to consider are:

- Encouraging self-directed learning empowers workers to take ownership of their professional development and career growth.
- Workers can choose training that fits their schedules and learning styles, making it easier to integrate into their daily routines.

Balancing Self-Directed and Guided Training

- The Registration Authority must establish a framework that outlines essential training areas and competencies, ensuring that all workers meet minimum standards.
- Service providers should conduct regular assessments and performance reviews to help workers identify their training needs and set goals.
- Provide registrants access to resources, such as training programs, mentorship, and professional development opportunities, to support self-directed learning.
- Service providers must implement feedback mechanisms where workers can discuss their training needs and progress with supervisors or mentors.

Collaborative Approach

- Service delivery organisations must create individual development plans (IDPs) for their workers that combine self-assessment with input from supervisors and training coordinators.

- The Registration Authority and service organisations must encourage a culture of continuous improvement where workers regularly update their skills and knowledge based on feedback and changing industry standards.
- Organisations must recognise and reward workers who actively engage in their professional development, motivating others to do the same.

i. Alternatively, should they be determined by the employer?

It should be a collaborative process. By combining self-directed training with structured guidance and support, personal care workers can effectively address their training needs while ensuring they meet industry standards and provide high-quality care.

10. Should ongoing training requirements be the same or different for workers employed in different aged care settings, for example in home care versus residential aged care settings? Why?

Training requirements that affect a range of aged care settings should be the same across the workforce. Any ongoing training requirements beyond this should be tailored to the specific needs of different aged care settings, such as home care and residential aged care:

Home Care Settings

- Home care workers often provide one-on-one care, which requires a deep understanding of the specific needs and preferences of each client. Training should focus on personalised care plans, communication skills, building strong relationships with clients, and supporting the individual to maintain autonomy and independence where possible.
- Home care workers typically work independently, so training should emphasise decision-making, problem-solving, and emergency response skills.
- Training should cover how to adapt care practices to various home environments, including safety assessments and modifications to ensure a safe living space for clients.

Residential Aged Care Settings

- In residential settings, care is often provided by a team of workers. Training should focus on teamwork, collaboration, and effective communication within a multidisciplinary team.
- Residents in aged care facilities may have more complex health needs, requiring specialised training in areas such as dementia care, palliative care, and managing chronic health and mental health conditions.
- Residential aged care facilities are subject to strict regulatory requirements. Training should include compliance with health and safety standards, infection control, and documentation practices.

Common Training Topics

- While there are differences, some training areas should be common across both settings:
 - Basic Care Skills: Fundamental skills such as personal care, mobility assistance, and medication management should be covered for all workers.
 - Ethical and Professional Standards: Training on ethical behaviour, professional conduct, and respecting clients' rights and dignity is essential in all settings.
 - Cultural Competency: Understanding and respecting cultural differences is important in providing person-centred care in any setting.

Tailored Training is Important

- Tailored training ensures that workers receive relevant and practical skills that directly apply to their specific work environment.
- Training that addresses the unique challenges of each setting is more likely to be effective and improve the quality of care provided.
- Workers who feel well-prepared and supported in their roles are more likely to experience job satisfaction and remain in the workforce.

11. Which mode/s of training should be introduced for workers to get the best outcomes (for example, on the job, case studies, instructor-led training)?

With any qualification in the health and community services fields, a mix of theoretical and practical training is ideal to ensure a consistent demonstration of the required skills and knowledge across settings and over a period of time.

A work placement component would be essential for any personal or aged care worker to ensure theory is translating across to effective and safe application as supervised and observed by a current and suitably qualified industry professional.

12. How can training ensure the worker has the right values and personal attributes to work with older people accessing aged care services, given this is critical to working in aged care services?

Values-based recruitment and orientation is when an organisation can assess whether a person has the right values and personal attributes to work in the sector. Whilst training supports the values and principles of best practice, it cannot absolutely ensure that a person is fit for the role. However, training can include values and principles in their course suitability criteria. Some examples may include:

- empathy, patience and the desire to support and empower others
- a passion for working with a diverse range of people
- willingness to help people feel safe and supported
- kind, honest and respectful
- ability to treat people with dignity and respect and value their diversity
- ability to work independently and in groups

Further, ensuring that human rights, person-centred, trauma-informed, recovery-oriented, supported decision making practice is embedded into all training will ensure that workers pick up the inherent values associated with them, including individual worth, dignity, choice, autonomy, respect and hope. The trainer and assessor can also have a significant impact in ensuring any graduate has demonstrated the required employability skills that encompass the values and personal attributes involved in the role. For example, assessment should not just be about the demonstration of a skill without doing so in the appropriate context and with the required interpersonal capability.

Certainly, by making registration mandatory a person engaging in the training and meeting the requirements will have shown a willingness to learn and a desire to work in the sector. As things currently stand often people work in the sector because qualification is not required, and they need to find immediate employment.

During the recruitment process, organisations should assess candidates for values such as empathy, respect, patience, and compassion. This can be done through competency based and behavioural interviews, situational judgment tests, and personal assessments.

Ensuring that workers have the right values and personal attributes to work with older people is indeed critical in aged care services. There are some strategies to incorporate these aspects into training programs which will certainly foster the desired work culture.

Values-driven training provides an opportunity to integrate values and personal attributes into the training curriculum. This includes using real-life scenarios and role-playing exercises to emphasise the importance of these values in everyday care situations.

Person-centred and Person-led Care Training

- Include modules that focus on developing empathy and understanding the emotional needs of older people.
- Train workers in effective communication skills, including active listening, non-verbal communication, and building rapport with clients.
- Ensure that training includes cultural competency to respect and understand the diverse backgrounds of older people.

Supported Decision-Making Training

- SDM is currently recognised as essential to providing best practice, person-centred and person-led care and supports across aged care, mental health and disability services.
- The availability of SDM is commonly expressed in policy and principles of practice, and it is becoming more visible in programs and in models of care.
- Aligning with the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), the law in many contexts now emphasises greater participation of the person in treatment planning and care, acknowledging and respecting individual choice about care, support and treatment, promoting self-determination and autonomy, and presuming legal capacity on an equal basis with others.
- Whilst SDM may not be legislated in Australia, it is mandated by the UNCRPD, and able to be applied under our laws. It aligns with legislative principles, government policies and is accepted best practice.
- SDM moves away from stigmatising attitudes, such as that people living with age related difficulties lack the capacity to make their own decisions or need others to make decisions for them.
- It supports people's right to self-determination, autonomy and dignity of risk. It supports people's equality before the law, so that people living with age related conditions are provided the same rights as others.

Reflective Practice

- Service providers should encourage workers to engage in self-reflection to understand their own values and how they align with the principles of aged care in the service.
- Regular feedback mechanisms where workers can receive constructive feedback on their interactions with clients and reflect on areas for improvement are important to support best practice.

Mentorship and Role Models

- Mentors can provide guidance, support, and model appropriate behaviours.
- Highlighting role models within the organisation who can demonstrate exemplary care, and values can be valuable supports to new entrants into the sector.

Continuous Professional Development

- The Registration Authority and Service Providers must offer ongoing flexible training opportunities that reinforce the importance of values and personal attributes. This can include workshops, seminars, and e-learning modules.

- Funding for ongoing CPD needs to be considered with the implementation of a National Registration Scheme to ensure the sustainability of the Scheme and the workforce.

13. What types of implementation support should be introduced to aid the introduction of this requirement?

- Are there specific barriers for some groups of personal care workers, including, for example, First Nations workers, migrant workers, culturally and linguistically diverse workers, workers with disability, and workers from low socioeconomic backgrounds?**
 - What kinds of supports or exemptions should be made for these workers (for example, additional time to meet requirements, materials provided in plain English)?**
 - Should these be short-term or longer-term solutions?**
- Some workers in regional, rural and remote settings may not have a local training provider offering relevant recognised training courses. Workers across the sector may also not have access to appropriate technology.**
 - What kinds of supports or exemptions should be made for these workers?**
 - Should these be short-term or longer-term supports or exemptions? Why?**

Service providers operating in the aged care sector are better placed than MHCC to answer the above Question 13.

14. What should be considered when thinking of how this requirement could be expanded to other sectors in the care and support economy?

- It is important to consider training entry pathways from other care and support sectors to ensure mobility and movement to address workforce shortages and ensure no sector operates in a silo, further fragmenting the care and support economy.
- Consideration of organisational readiness, and how this requirement may impact a range of different-sized organisations is crucial. Organisations are often not funded when requirements change but are expected to ensure compliance with any required standards. The implementation of an electronic passport should not be done in isolation from other health and community services sectors, and should include extensive, documented consultation.

15. What transition timeframes, or phasing arrangements, should be considered to support the successful implementation of this requirement?

Note: The question above relates to professional development. However, we take this opportunity to answer the same question but in relation to implementation of the scheme itself.

Implementing an aged care registration scheme requires careful planning and phased arrangements to ensure a smooth transition. Key considerations for transition timeframes and phasing, in our view include:

Initial Planning Phase (6-12 months)

- **Stakeholder Consultation:** Engage with stakeholders, including aged care providers, workers, regulatory bodies, and advocacy groups, to gather input and build consensus on the scheme's design and implementation.
- **Regulatory Framework:** Develop the regulatory framework, including the standards, requirements, and processes for registration.
- **Communication Strategy:** Create a comprehensive communication strategy to inform all stakeholders about the upcoming changes and the benefits of the registration scheme.

Pilot Phase (6-12 months)

- **Pilot Programs:** Implement pilot programs in selected regions or facilities to test the registration processes and identify any potential issues.
- **Feedback and Adjustment:** Collect feedback from participants in the pilot programs and make necessary adjustments to the scheme based on their experiences.
- **Training and Support:** Provide training and support to workers and employers involved in the pilot programs to ensure they understand the new requirements and processes.

Gradual Rollout Phase (12-24 months)

- **Phased Implementation:** Roll out the registration scheme in phases, starting with larger urban areas and gradually expanding to regional, rural, and remote areas.
- **Support Systems:** Establish support systems, such as helplines and online resources, to assist workers and employers during the transition.
- **Monitoring and Evaluation:** Continuously monitor the implementation process and evaluate its effectiveness, making adjustments as needed.

Full Implementation Phase (24-36 months)

- **Mandatory Registration:** Make registration mandatory for all aged care workers, with clear deadlines for compliance.
- **Ongoing Training and Development:** Ensure that ongoing training and professional development opportunities are available to help workers meet the new standards.
- **Compliance and Enforcement:** Implement compliance and enforcement mechanisms to ensure that all workers and providers adhere to the registration requirements.

Post-Implementation Phase (Ongoing)

- **Continuous Improvement:** Regularly review and update the registration scheme to address emerging issues and incorporate best practices.
- **Stakeholder Engagement:** Maintain ongoing engagement with stakeholders to gather feedback and ensure the scheme continues to meet the needs of the aged care sector.
- **Evaluation and Reporting:** Conduct regular evaluations and publish reports on the scheme's impact, effectiveness, and areas for improvement.
- By following these phased arrangements, the implementation of an aged care registration scheme can be managed effectively, ensuring a smooth transition and long-term success.

16. Could there be an industry-led product that supports employers and workers to identify and prioritise high-value training opportunities?

An industry-led product that supports employers and workers in identifying and prioritising high-value training opportunities could be highly beneficial. A number of things could be considered:

- A comprehensive catalogue of accredited and non-accredited training programs, including micro-credentials, workshops, and online courses, categorised by relevance and value.
- User-generated feedback and ratings for training programs to help workers and employers make informed decisions about the quality and effectiveness of different options.
- Integration with existing HR and learning management systems to streamline the process of enrolling in and completing training programs.
- Regular updates on industry trends, emerging skills, and high-demand areas to help employers and workers stay ahead of the curve.
Employers can use the catalogue to identify skill gaps and plan for future workforce needs, ensuring they have the right talent to meet organisational goals.
- Collaboration with industry bodies, training providers, and regulatory agencies to ensure the product meets industry standards and addresses the needs of all stakeholders.

- A user-friendly interface that makes it easy for employers and workers to navigate and use the product effectively.
 - Data Security and Privacy: Ensuring that all data collected and stored by the product is secure and complies with privacy regulations.
- a. Should the national worker registration scheme be supported by a professional network where workers could develop communities of practice and promote and share training and skills opportunities?**

Supporting the national worker registration scheme with a professional network where workers can develop communities of practice and share training and skills opportunities would be highly beneficial because:

- A professional network allows workers to share knowledge, best practices, and experiences, fostering a culture of continuous learning and improvement.
- Workers can collaborate on common challenges, seek advice, and provide support to one another, enhancing their professional development and job satisfaction.
- A network can serve as a central hub for accessing training materials, resources, and information about upcoming training opportunities and industry events.
- Career Development: Workers can use the network to explore career development opportunities, such as mentorship programs, job openings, and professional certifications.
- Developing communities of practice helps build a sense of belonging and community among workers, which can improve morale and retention.

Features of the Professional Network

- An online platform where workers can create profiles, join discussion forums, and participate in virtual events and webinars.
- A comprehensive library of training materials, articles, research papers, and other resources relevant to aged care.
- Mentorship Programs that connect less experienced workers with seasoned professionals for guidance and support.
- Discussion Forums: Forums where workers can discuss specific topics, share experiences, and seek advice from peers
- A calendar of industry events, training sessions, and webinars that workers can attend to enhance their skills and knowledge.
- Programs to recognise and reward workers who actively contribute to the community and demonstrate excellence in their roles.

Implementation Considerations

- Ensure the platform is easy to navigate and accessible to all workers, regardless of their technical skills.
- Implement robust privacy and security measures to protect users' personal information and data.
- Keep the platform updated with the latest training opportunities, resources, and industry news.
- Develop strategies to encourage active participation and engagement from workers, such as incentives, and regular communication.
- Provide mechanisms for users to give feedback on the platform and suggest improvements.

By integrating a professional network with the national worker registration scheme, we can create a supportive and collaborative environment that promotes continuous learning and professional growth for aged care workers.

17. How should the ongoing training requirement be funded?

Funding ongoing training requirements for aged care workers is crucial to ensure they can continuously develop their skills and provide high-quality care. It will be important to ensure that funding mechanisms are designed to provide equitable access to training for all workers, regardless of their financial situation and to develop sustainable funding models that can support ongoing training needs over the long term.

MHCC suggest that governments provide grants and subsidies to aged care providers to cover the costs of training programs, to ensure that all workers have access to necessary training without financial barriers. The other possibility is to offer tax incentives to employers who invest in their workers' professional development can encourage more organisations to prioritise training.

a. How might funding vary depending on whether this requirement is learning, training and/or continuing professional development?

Funding needs to focus on the minimum standards so that resources are focused on supporting workers to meet the requirements and, therefore, increase employment and quality assurance within the sector.

Funding should ensure responsibility for learning, training and CPD is spread across the individual worker, employers and the Government in ways that are sustainable and support business continuity and sector development.

b. What is the government's role in funding and making available high-quality training?
i. Are online short-courses, (for example, the [Equip Aged Care Learning Packages](#)) a useful tool to support workforce skills, knowledge and capability to deliver safe and high-quality care?

The Government's role should include ensuring that any barriers to entry into a sector are reduced in order to address workforce shortages and ensure accountability and transparency of employers and employees. Funding of high-quality training must be supported by the industry to ensure quality and consistency, and access and equity must be taken into consideration in terms of who can get access to this funding.

18. What else should be done to support workers to explore and take up training opportunities?

- a. What dedicated actions, or initiatives, could support this?**
b. How could this approach be enhanced to also support future job design and career pathway opportunities for workers?

In addition to the answers provided to question 16, supporting workers to explore and take up training opportunities could involve the following:

a. Dedicated actions and initiatives

- A clear sector roadmap including the range of required training that is available, and other ongoing professional development opportunities to engage with.
- Development of national guidelines outlining training requirements and a detailed sector development plan, including transition and implementation phases and funding opportunities available.
- Minimum annual CPD hours to maintain registration.
- Incentives to engage in CPD including milestone certificates and badges for display on online platforms such as Linked In.
- Development of Communities of Practice and funded training opportunities for the sector to learn from one another.

- Recognised approved training providers who receive funding to ensure there is consistency in quality and workers know that the training they access is trusted, compliant, recognised and relevant.

b. Supporting future job design and career pathway opportunities for workers

- A sector roadmap and development plan can ensure there is long term investment into the training of the sector and that future needs have been considered in any implementation.
- Training data can confirm engagement of the workforce in a range of training offerings and inform future training needs and gaps.
- CPD data submitted by workers can highlight training trends, areas of need and interest.
- Public feedback register for workers and employers to submit feedback on training available and what gaps exist.
- Regular compilation of training data including what training was accessed and industry completion rates and feedback to further understand and describe current, new and emerging career pathways.

19. How could greater flexibility be implemented in this approach to support workers interested in undertaking further training, or broadening their knowledge in other (non-core) areas of aged care service delivery?

Service providers operating in the aged care sector are better placed than MHCC to answer the above Question 19.

Section 3. Skills and qualification requirements:

If the government was to establish mandatory minimum skills and qualification requirements for personal care and/or disability support workers:

20. What minimum skills and qualifications should be considered?

A range of minimum skills and qualifications should be considered that support the Australian Government's Aged Care Quality and Safety Commission's Code of Conduct for Aged Care⁴⁶. Noting that these do not apply in the following contexts, they can still provide guidelines for safe and effective care:

- the Commonwealth Home Support Programme (CHSP)
- the National Aboriginal and Torres Strait Islander Flexible Aged Care Program (NATSIFACP).

These can include:

- Minimum Certificate III level qualification in Aged Care and Disability (depending on the specific job role)
- Minimum employability skills including:
 - Communication skills
 - Problem solving
 - Initiative and enterprise
 - Planning and organising
 - Teamwork
 - Self-management
 - Learning skills
 - Digital and technology skills⁴⁷

- Specific training that covers the following:
 - Anti-discrimination
 - Responding to abuse and neglect
 - Infection control
 - Cultural safety and inclusive practice
 - Supported decision-making
 - Support independence and wellbeing
 - Risk reduction
 - Person-centred communication
 - Implementing individual plans
 - Psychosocial needs of the person, families and carers

21. Are there any current training offerings (for example, qualifications or skill sets) in the national Vocational Education and Training (VET) system that might be suitable for supporting any personal care mandatory minimum skills and qualification requirements?

There are a range of current VET training offerings that may be suitable for supporting personal care mandatory minimum skills and qualification requirements including:

- CHC33021 Certificate III in Individual Support (Ageing and Disability)
- CHC43015 Certificate IV in Ageing Support
- CHC43121 Certificate IV in Disability Support
- CHCAGE013 Work effectively in aged care
- 10993NAT Certificate IV in Dementia Practice
- HLTENN045 Implement and monitor care of the older person
- CHCCCS040 Support independence and wellbeing
- CHCAGE008 Implement falls prevention strategies
- CHCSS00127 High Support and Complex Care - Aged Care Skill set including the following units of competency:
 - CHCAGE009 Provide services for older people
 - CHCAGE010 Implement interventions with older people to reduce risk
 - CHCAGE011 Provide support to people living with dementia
 - CHCPAL003 Deliver care services using a palliative approach
 - HLTHPS006 Assist clients with medication

The Jobs and Skills Council responsible for the care and support economy, HumanAbility, is currently updating a range of these qualifications in part because the last update resulted in these qualifications being unfit for purpose to the sector. Some key findings from their 2024 consultation and desktop research project included:

- substantially reduced demand for the CHC43121 Certificate IV in Disability Support since the introduction of the CHC33021 Certificate III in Individual Support as an entry requirement
- training providers experiencing difficulties in accessing work placements with appropriate supervision and mentoring, especially for home care, regional areas and disability worker
- a lack of flexibility impedes the ability to design elective streams to meet local industry needs and workforce skilling requirements. The electives do not align with the breadth of roles that an individual may take up in the aged care and disability workforce, e.g. community participation, recreational roles
- a recognised gap for some providers delivering qualifications to Aboriginal and Torres Strait Islander students which them to have culturally appropriate models of training and sufficient cultural competence

- remote communities have limited access to training facilities and suitable placement opportunities which significantly affects Aboriginal and Torres Strait Islander communities, who face compounding barriers to accessing entry-level training
- increasing interest from people with disability to use their lived experience in the disability sector, however the CHC33021 Certificate III in Individual Support includes physical requirements that may exclude them from taking part in training
- over a quarter of surveyed students encountered barriers to completing their training. Challenges included complexity of the content, the timing of training and ability to attend, hidden costs such as paying for NDIS clearance, police checks and uniforms, finding work placement and meeting the required work placement hours, and potential loss of income in completing work placements exacerbated by current cost of living pressures⁴⁸.

Any training and education should be created in collaboration and consultation with industry to ensure qualifications are providing the relevant skills and knowledge for workers to provide consistent quality care.

22. Should there be different requirements for new workers and workers who already work in aged care/disability support/veterans' care? If so, what should these be?

- a. For example, the recognition of experience to support the retention of some groups of existing workers with the right attitude and aptitude to provide care, but who do not hold a formal qualification.**

The health and community services sectors have a large percentage of workers who are experienced but do not hold a formal qualification. The skills and knowledge of these workers are essential to the ongoing development of the sector and provision of care. The use of Recognition of Prior Learning and Recognition of Prior Experience pathways in VET qualifications and training may provide pathways to these workers to gain recognition of their skills and knowledge without needing to complete a full qualification or present barriers for these workers to remain in the sector.

23. Should workers be able to undertake study to attain a qualification while they are employed (for example, through a provisional registration category)?

- a. If workers can undertake study while employed:**
- i. How long should a worker be able to work before starting their qualification, and should there be a minimum expected study load, or expected completion window?**
 - ii. Should there be any limitations to the types of job roles that a worker could perform while undertaking study?**

MHCC supports the creation of a provisional registration category for people that are undertaking study; however, there needs to be a benchmark of required skills before one can be employed. Some additional considerations include:

- Implementing a 'scaffolding' approach to training and employment similar to that of work placement in VET– required foundational skills and knowledge before any practical application can begin safely
- A worker should not be able to commence employment without meeting the required minimum skills and knowledge
- Study through on the job training or traineeship models are effective and can occur alongside employment although there is evidence of limited uptake of traineeships in this sector with further research needed to identify causes and possible solutions⁴⁹.
- Minimum expected study loads, and completion windows should be up to the training providers and employers as long as the minimum skills and knowledge requirements are met.

24. How might an increase in mandatory skill-based requirements affect the supply of personal care workers in aged care, disability support and/or veterans' care?

The balance between ensuring access to suitable entry pathways to the personal care sector as well as addressing workforce and occupational shortages and the need for consistent quality minimum requirements is important, though not simple. Mandatory skill-based requirements must consider other incentives the sector may provide including:

- Remuneration and benefits
- Difficulty of the work
- Individual attributes and suitability to the role
- Personal satisfaction
- Organisational support
- Access to ongoing training and PD support
- Reputation of the sector

Whilst an increase in mandatory skill-based requirements may result in a reduction to the supply of personal care workers to aged care, disability and/or veterans' care, it will ensure the sector is led by recognition of, and investment into the ongoing support and development of those who decide to pursue a career in these sectors. The purpose of mandatory skill-based requirements is to ensure quality care and to provide a clear and simple pathway to achieve this, rather than a complex set of requirements that act as a barrier to entry or retention.

25. Minimum English language and communication skills are often recommended for workers, including by the Royal Commission, if a mandatory minimum qualification was introduced, would this sufficiently meet the intent of this?

- a. If not, what requirements should be introduced to ensure workers are proficient in English and have adequate communication skills?
- b. What supports and/or exemptions should be put in place to minimise risk of direct and indirect discrimination?
- c. Who should be responsible for the costs associated with developing or demonstrating English language and communication skills?

Vocational Education and Training qualifications have minimum foundation skills embedded into the qualification, either implicitly or explicitly. For example, the unit CHCCCS031 Provide individualised support in the CHC33021 Certificate III in Individual Support (Ageing and Disability) states that:

“Foundation skills essential to performance are explicit in the Performance Criteria of this unit of competency.”⁵⁰

This ensures that any minimum formal qualification will address foundation skills such as communication in the course. This will also be linked to eligibility criteria including the minimum Language, Literacy, Numeracy and Digital Skills (LLND) required for entry into the qualification.

However, to ensure pathways for individuals who may not currently hold these minimum skills, the promotion and Government funding of core skills courses for both domestic and international students, and training offerings at Certificate I and II levels may support the development of these required minimum English language and communication skills. The Government can support the funding of these to ensure workforce shortages are being reduced and pathways exist that promote access and equity to a range of diverse populations.

“Where government funding is provided for core skills training, LLN practitioners may use the Australian Core Skills Framework (ACSF) levels of performance to support applications to government agencies, report on learner progress and evaluate program effectiveness. The use of the ACSF for these purposes facilitates national equity and accountability and provides valid statistical feedback on the impact of government-funded programs that focus on core skills development.”⁵¹

26. What types of implementation support should be considered to aid the introduction of any of the above requirements?

- a. Are there specific barriers and considerations for some groups of personal care workers, including, for example, First Nations workers, migrant workers, culturally and linguistically diverse workers, workers with disability, and workers from low socioeconomic backgrounds?
 - i. What kinds of supports, flexible arrangements or exemptions should be considered?
- b. Some workers in regional, rural and remote settings may not have access to a local training provider offering relevant recognised training courses.
 - i. What kinds of supports or exemptions should be considered?
- c. Should there be different considerations for workers employed in in-home care settings? If so, what should these be?

Further to the answers provided in response to Question 7, implementation considerations to ensure equitable access for a range of populations include:

- Flexible study arrangements for regional, rural and remote workers including the use of simulated assessment for practical application and funded opportunities to participate in Communities of Practice
- Additional funding and scholarships, similar to the Department of Education’s Smart and Skilled program that focuses on priority populations and individuals who may have less access to training and career opportunities including First Nations workers, migrant workers, CALD workers, workers with a disability and workers from low socioeconomic backgrounds
- Specific requirements for the following programs:
 - the Commonwealth Home Support Programme (CHSP)
 - the National Aboriginal and Torres Strait Islander Flexible Aged Care Program (NATSIFACP).

27. What should be considered when thinking of how these requirements could be expanded to other sectors in the care and support economy?

- a. What are your views on whether the same mandatory minimum skills and qualification requirements should apply for personal care workers across aged care, disability support and veterans’ care?
 - i. Should requirements be the same or different for workers across these three areas? Why?

Service providers operating in the aged care, disability and veterans’ care sectors are better placed than MHCC to answer the above Question 27.

28. What else may need to be considered to address any potential increase in workforce challenges, in thin market settings, where there may not be access to enough workers with minimum qualifications?

It is essential that a thorough and considered workforce development plan is created that includes long term investment in any scheme that is implemented. Stages of implementation will require transition phases that address immediate workforce challenges and needs, whilst addressing how to ensure a sustainable and suitably qualified workforce that can support sector retention and quality, documented outcomes. Incentives such as fee-free training and scholarships along with the development of a mandatory minimum entry skills qualification to support studying whilst being employed may assist with the transition and effective implementation.

29. What kinds of investments may be required to ensure there is equitable access to training wherever a worker resides?

The types of investments required to ensure there is equitable access to training wherever a worker resides may include:

- Long term investments that span a minimum of five years to ensure adequate organisational implementation and support for workers without compromising business continuity or fear of loss of funding.
- Scholarships or funded training places that include travel, accommodation and meal allowances.
- Investments that work in partnership with trusted organisations in the sector who can support the engagement and completion of workers engaging in training.
- Funding to existing training providers, such as Registered Training Providers, who are incentivised to conduct face to face training in regional, rural and remote areas.
- Clear access and equity principles in investment planning and selection process to ensure bias and discrimination is reduced.

30. How could workers who need to improve their English language proficiency be best supported?
a. Should there be an online short-course that could support workers to communicate effectively in the aged care sector (for example, building on the short-courses available through the [Equip Aged Care Learning Packages](#) program)?

Please see response to Question 25 above. In addition to this, some other considerations include:

- Promotion of live, interactive training instead of online, self-paced learning to ensure the mix of theory and practical application in English language proficiency
- Alignment with existing English tests and courses such as IELTS

For those who are interested in the Aged Care or Personal Care sectors, or who may have a minimum level of English proficiency, short, free online courses that can support workers to communicate effectively in the aged care sector would be effective, but not a replacement for foundation core skills.

Concluding comment

MHCC thanks the Department of Health and Aged Care for the opportunity to share the evidence we have scoped from the literature as well as material gathered from MHCC colleagues, member organisations, the broader CMO mental health sector and other agencies that we work with including in the aged care sector.

Members whose programs include seniors' services provided us with feedback indicating that perspectives from providers across the sector is mixed—some are in favour of professionalising and regulating the workforce, while others express concerns about the difficulties in recruiting workers. They are also concerned about the administrative cost on providers, the cost and availability of training, and the challenges of requirements for Home & Community Care (HaCC) and Residential Aged Care (RAC).

MHCC are hopeful that in progressing this national registration scheme that Government will support the sector to transition to a scheme, and that if appropriately implemented, it will bring about service improvements and create a workplace that encourages people into the sector and provides sustainable career pathways.

A question was also raised as to whether the regulations and rules would apply to medical professionals working in aged care, and if so whether existing accreditations are sufficient. We would appreciate a better understanding of how these issues might be addressed.

With the appropriate funding and resources and support for the sector, MHCC propose that the concept of a national registration scheme to professionalise age care workers in Australia is an important initiative that would not only benefit the people using age care services, ensuring a better-quality service, but provide workers with opportunities to work more broadly across mental health, and psychosocial disability service areas.

There are a multitude of accredited and non-accredited training modules developed in the community mental health and psychosocial disability contexts which if provided to aged care workers could greatly enhance best practice in the aged care sector and allow for greater movement between service systems.

We very much look forward to hearing the result of your deliberations. Please feel free to connect with us to discuss any details about the issues raised in this paper and future consultation topics.

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References

- ¹ ACAN Anti-Slavery Network, *ACAN Modern Slavery Training 101*. Available: <https://www.acan.org.au/>
- ² Australian Human Rights Commission 2021, *Modern Slavery in the Health Services Sector: The essential guide for managing modern slavery risks*. Available: https://humanrights.gov.au/sites/default/files/document/publication/ahrc_20211115_modern_slavery_-_health_services_v9_web.pdf
- ³ Age Care & Quality and Safeguard Commission 2024, *Draft Evidence mapping Framework*. Available: <https://www.agedcarequality.gov.au/resource-library/draft-evidence-mapping-framework>
- ⁴ Department Of Health and Aged Care 2024, *Specialisation Verification Aged Care Provider Manual*. Available: <https://www.health.gov.au/sites/default/files/2024-09/my-aged-care-provider-specialisation-verification-aged-care-provider-guidance-manual.pdf>
- ⁵ Ibid.
- ⁶ The Centre for Future Work at the Australia Institute 2024, *Professionalising the Aged Care Workforce: The case for worker registration and a mandatory qualification*, MacDonald, F. Available: https://futurework.org.au/wp-content/uploads/sites/2/2024/03/P1438_CFW-Aged-Care-Worker-Registration_final-Web.pdf
- ⁷ Ibid.
- ⁸ The Centre for Future Work at the Australia Institute 2024, *Professionalising the Aged Care Workforce: The case for worker registration and a mandatory qualification*, MacDonald, F. Available: https://futurework.org.au/wp-content/uploads/sites/2/2024/03/P1438_CFW-Aged-Care-Worker-Registration_final-Web.pdf
- ⁹ Commonwealth Home Support Program (CHSP) Good Practice Guide 2018, *Wellness and Reablement*. Available: <https://www.health.gov.au/sites/default/files/documents/2019/12/wellness-and-reablement-summary-of-consultations-across-the-home-care-sector.pdf>
- ¹⁰ US Bureau of Labor 2023, *Home Health Care and Personal Aides*. Available: <https://www.bls.gov/ooh/healthcare/home-health-aides-and-personal-care-aides.htm>
- ¹¹ Interview Guy 2025, *Residential Care Worker Job Description*. Available: <https://interviewguy.com/residential-care-worker-job-description/>
- ¹² Aging Care 2025, *Home Care Worker Questions Answered: Types, Qualifications, Duties, and More*. Available: <https://www.agingcare.com/articles/home-care-workers-478430.htm>
- ¹³ Working in Residential Care Services, online blog. Available: <https://www.wgu.edu/blog/working-residential-care-services2303.html>
- ¹⁴ *Advantages of e-passport | Disadvantages of electronic passport*. Available: <https://www.rfwireless-world.com/Terminology/Advantages-and-Disadvantages-of-e-passport.html>
- ¹⁵ Intelligent Health Tec. Available: <https://www.rfwireless-world.com/Terminology/Advantages-and-Disadvantages-of-e-passport.html>
- ¹⁶ Department of Education 2023, *Australian Universities Accord Interim Report*. Available: <https://www.education.gov.au/australian-universities-accord/resources/accord-interim-report>
- ¹⁷ Health Information Exchange 2022, *Digital Health Passports: Key Considerations for Interoperability and Data Exchange*. Available: <https://www.himss.org/networking/committees/interoperability/>

- ¹⁸ BMC 2023, *Geographical and practical challenges in the implementation of digital health passports for cross-border COVID-19 pandemic management: a narrative review and framework for solutions*. Available: <https://globalizationandhealth.biomedcentral.com/articles/10.1186/s12992-023-00998-7>
- ¹⁹ KPMG Consulting & Australian National Training Authority (ANTA), 1997, *Preliminary Advice on a Skills Passport System*. Available: <https://www.voced.edu.au/content/ngv%3A54639>
- ²⁰ Commonwealth of Australia 2023, *Working Future: The Australian Government's White Paper on Jobs and Opportunities*. Available: <https://treasury.gov.au/sites/default/files/2023-10/p2023-447996-working-future.pdf>
- ²¹ Ibid, 13 & 14.
- ²² Fowler, C. 2023, *Skills Passport – Game Changer or New e-Cover on Old Book?* Available: <https://futurecampus.com.au/2023/11/15/skills-passport-game-changer-or-new-e-cover-on-old-book/>
- ²³ Indigenous Corporate Training. *8 Basic Barriers to Indigenous Employment*. Available: <https://www.ictinc.ca/blog/8-basic-barriers-to-indigenous-employment>
- ²⁴ Indigenous Corporate Training. *7 Basic Solutions for Barriers to Indigenous Employment - #2 of 3*. Available: <https://www.ictinc.ca/blog/7-basic-solutions-barriers-to-indigenous-employment>
- ²⁵ Global Citizen, *Seven of the biggest challenges immigrants and refugees face*. Available: <https://www.globalcitizen.org/en/content/the-7-biggest-challenges-facing-refugees-and-immig/>
- ²⁶ Immigration Research Initiative 2023, *Immigrants in the U.S. Economy: Overcoming Hurdles, Yet Still Facing Barriers*. Available: <https://immresearch.org/publications/immigrants-in-the-u-s-economy-overcoming-hurdles-yet-still-facing-barriers/>
- ²⁷ Score 2024, *Overcoming Language Barriers in the Workplace: Strategies for a More Inclusive Environment*. Available: <https://www.score.org/utah/resource/eguide/overcoming-language-barriers-workplace-strategies-a-more-inclusive-environment>
- ²⁸ HULT Business School 2018, *13 benefits and challenges of cultural diversity in the workplace*. Available: <https://www.hult.edu/blog/benefits-challenges-cultural-diversity-workplace/>
- ²⁹ Score 2024, *Overcoming Language Barriers in the Workplace: Strategies for a More Inclusive Environment*. Available: <https://www.score.org/utah/resource/eguide/overcoming-language-barriers-workplace-strategies-a-more-inclusive-environment>
- ³⁰ Capita Works 2024, *The Impact of Remote Work on Urban and Rural Areas*. Available: <https://capitaworks.com/articles/202/the-impact-of-remote-work-on-urban-and-rural-areas>
- ³¹ Geoaffairs.com 2023, *The Geography of Remote Work*. Available: <https://www.geoaffairs.com/geography-of-remote-work/>
- ³² BMC 2025, *Staff-reported barriers and facilitators to the implementation of healthcare interventions within regional and rural areas: a rapid review*. Available: <https://bmchealthservres.biomedcentral.com/articles/10.1186/s12913-025-12480-8>
- ³³ CDC 2024, *Disability Barriers to Inclusion*. Available: <https://www.cdc.gov/disability-inclusion/barriers/index.html>
- ³⁴ US Bureau of Statistic 2020, *The Economics Daily*. Available: <https://www.bls.gov/opub/ted/2020/barriers-to-employment-for-people-with-a-disability.htm>
- ³⁵ APA 2017, *Education and Socioeconomic Status*. Available: <https://www.apa.org/pi/ses/resources/publications/education>
- ³⁶ Diversity.com 2025, *Socioeconomic Status and DEI: Why Income Inequality is a Diversity Issue*. Available: <https://diversity.com/post/socioeconomic-status-dei-income-inequality>

- ³⁷ Ausmed. Learning Hubs, Age Care Hub. Various, Available: <https://www.ausmed.com.au/learn/hubs/older-adults>
- ³⁸ NSW Nurses & Midwives' Association, *Continuing Professional Development*. Available: <https://www.nswnma.asn.au/education/cpd/>
- ³⁹ Arise Care Staff. Blog. Available: <https://www.arisecarestaff.com.au/blogs/the-importance-of-continuous-professional-development-for-aged-care-workers>
- ⁴⁰ Sanctuary Recruitment. Online: Available: <https://www.sanctuaryrecruitment.com/blog/what-skills-does-an-aged-care-worker-need/>
- ⁴¹ Open Colleges. Blog. Available: <https://www.opencolleges.edu.au/blogs/articles/what-skills-do-you-need-to-work-in-aged-care>
- ⁴² Altaira. Online: Available: <https://www.altaira.com.au/caring-for-the-elderly-essential-skills-every-aged-care-nurse-needs/>
- ⁴³ Smarter Skills. Online: Available: <https://smarterskills.com.au/non-accredited-aged-care-training-sydney/>
- ⁴⁴ Department of Health. Online. Available: <https://www.health.gov.au/sites/default/files/2025-01/free-training-opportunities-for-aged-care-workers.pdf>
- ⁴⁵ CAS Training Services. Online: Available: <https://www.castraining.com.au/non-accredited-courses/>
- ⁴⁶ Aged Care Quality and Safety Commission 2022, *Code of conduct for workers*. Available at: <https://www.agedcarequality.gov.au/workers/code-conduct-workers>
- ⁴⁷ National Centre for Vocational Education Research 2011, *Employability Skills at a Glance*. Available: https://www.ncver.edu.au/_data/assets/file/0013/2407/2404.pdf
- ⁴⁸ Australian Government National Vocational Register 2025, *Unit of Competency: CHCCCS031 Provide individualised support*. Available at: <https://training.gov.au/training/details/CHCCCS031/unitdetails>
- ⁴⁹ Australian Core Skills Framework 2012, *Australian Core Skills Framework: 5 Core Skills, 5 Levels of Performance, 3 Domains of Communication*. Available: https://research.acer.edu.au/cgi/viewcontent.cgi?article=1011&context=transitions_misc#:~:text=is%20the%20ACSF%3F-.How%20can%20the%20ACSF%20be%20used%3F,participate%20effectively%20in%20our%20society
- ⁵⁰ Australian Government National Vocational Register 2025, *Unit of Competency: CHCCCS031 Provide individualised support*. Available at: <https://training.gov.au/training/details/CHCCCS031/unitdetails>
- ⁵¹ Australian Core Skills Framework 2012, *Australian Core Skills Framework: 5 Core Skills, 5 Levels of Performance, 3 Domains of Communication*. Available: https://research.acer.edu.au/cgi/viewcontent.cgi?article=1011&context=transitions_misc#:~:text=is%20the%20ACSF%3F-.How%20can%20the%20ACSF%20be%20used%3F,participate%20effectively%20in%20our%20society



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