Submission on Design of National Registration Scheme for Aged Care Workers

Demographics

Which of the following best describes you?

- Older person (65+ years of age)
- Older First Nations person (50+ years of age)
- Family, carer or friend of an older person receiving aged care services
- Older person or aged care worker advocate
- Community member
- Personal care worker in aged care
- Enrolled or Registered Nurse in aged care
- Other care and support economy worker (e.g. disability support worker)
- Aged care provider
    - ✓ Other care and support provider
- Training provider

In which state or territory do you live, or mostly work or deliver a service?

- ✓ Victoria

What care and support programs do you/the older person receive, work in, provide or would like to provide comment on?

Select all that apply

- ✓ Commonwealth Home Support Programme
- ✓ Health, Allied Health, and community services

- ✓ Home Care Packages Program
- ✓ Multi-Purpose Services Program
- ✓ National Aboriginal and Torres Strait Islander Flexible Aged Care Program
- ✓ National Disability Insurance Scheme
- ✓ Residential aged care
- ✓ Short Term Restorative Care Program
- ✓ Transition Care Program
- ✓ Veterans' care – Community Nursing
- ✓ Veterans' care – Veterans' Home Care Program
- ✓ Do not receive any aged care services

- None of the above
- Prefer not to say

Do you speak a language other than English at home?

- Yes
- No
  - ✓ Prefer not to say

Do you identify as Aboriginal or Torres Strait Islander?

- Yes - Aboriginal
- Yes - Torres Strait Islander
- Yes - Aboriginal and Torres Strait Islander
- No
  - ✓ Prefer not to say

What is your age group?

- 18 or younger
- 19-29

- 30-39
- 40-49
- 50-59
- 60 or older
    - ✓ Prefer not to say

What is the highest level of education you have completed?

- Year 10 Certificate or equivalent
- Year 12 Certificate or equivalent
- TAFE Certificate or Diploma
- Bachelor's degree
- Graduate degree or higher
    - ✓ Prefer not to say

Which sections would you like to provide feedback for?

- ✓ National Worker Registration Scheme Design
- ✓ Training Requirements
- ✓ Skills qualifications requirements

Submission on Design of National Registration Scheme for Aged Care Workers

National worker registration scheme design

The government has committed to implementing a national worker registration scheme, with new training and skills requirements.

Alongside other government commitments, such as the aged care wage increase, this scheme will support the growth of a strengthened and professional personal care workforce, where workers are better valued for the important role they perform, with greater professionalisation opportunities and improved conditions.

The scheme will also form an important part of the government's vision of making aged care a safe place with important protections for older people.

Consultation approach

In this section the department is seeking feedback on the design and implementation of a national worker registration scheme.

This section poses a range of important considerations to support you in providing feedback on your preferred policy and implementation settings.

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

- Yes
- No
- Don't Know
    - ✓ I have another suggestion

Comment

Wyndham City Council supports a national worker registry to improve safety, transparency, and consistency across the care sector. A centralised system would reduce duplication, streamline compliance, and strengthen trust between clients, families, and carers.

- A limited-access public register—modelled on Australian Health Practitioner Regulation Agency (AHPRA)—could verify registration status, qualifications, and relevant conditions, especially for agency, home care, and independent workers. This would maintain privacy while addressing current challenges with fragmented systems and delays, as seen in the NDIS Worker Screening Check.
- Community development approaches complement the registry, including local workforce mapping, culturally safe training, and co-designed services that respond to local needs and enhance community participation.
- Aligning the registry with Aged Care Quality and Safety Commission (ACQSC) Standards would support worker capability, improve service accessibility, and promote sustainable care models.
- A well-designed registry would also assist with workforce navigation, provider connections, and care worker recognition—contributing to retention, sector reputation, and confidence in services that support ageing well with dignity.

Who should be responsible for collecting registration requirement evidence?

- Aged Care providers should be responsible for personal care workers
- Personal Care workers should be responsible for themselves
- Don't Know
    - ✓ I have another suggestion

Comment

Wyndham City Council recommends a shared accountability model between employers and workers.

Shared Accountability and Compliance

Employers and workers both contribute to registration management and compliance:

- Employers would oversee compliance by verifying and maintaining records through standard onboarding and ongoing checks, while workers retain a portable skills passport to support mobility, reduce duplication, and streamline verification across care settings.
- Independent contractors/sole traders register via accredited intermediaries responsible for compliance, insurance, and professional development.

Oversight, Credentialing and Governance

- A federal oversight body—similar to AHPRA's Nursing Board—can provide third-party governance, ensure national standards, manage compliance and penalties, and oversee a badge system to verify qualifications, support workforce mobility, and strengthen professional recognition.

Worker Protection and Reporting

- A confidential, accessible reporting process with strong safeguards can help protect workers raising concerns. Anonymous mechanisms and independent oversight would support a safe, transparent, and accountable sector.

Are there any other elements that should be considered for inclusion in a national worker registration scheme?

I.e., should there be different requirements for personal care workers employed in different settings, such as in-home versus residential care?

Comment

Wyndham City Council recommends the following elements to strengthen a national registration scheme:

Tiered Registration and Workforce Mobility

- A tiered model (full, provisional, enhanced) would reflect varying responsibilities and risks across in-home, residential, and community settings.
- A portable registration or badge system would support workforce mobility across aged care, disability, and veterans' care without re-registration.

Submission on Design of National Registration Scheme for Aged Care Workers

Centralised and Accessible System

- A Commonwealth funded centralised database would streamline compliance and ensure all workers meet certification and skill requirements, as well as reduce administrative duplication. An easy registration process is critical to workforce participation and retention.

Monitoring, Accountability, and Reporting

- Enhanced monitoring in in-home care—through audits, spot checks, and client feedback—would support quality and early identification of gaps.
- Transparent complaints pathways and anonymous whistleblower protections would help address misconduct.
- A limited-access public register displaying qualifications, screening, and registration type would support accountability while preserving privacy.
- Independent contractors and sole traders would register via accredited oversight body, with penalties for non-compliance. Lessons from NDIS enforcement actions show the importance of proactive oversight to prevent compliance evasion.

Equity, Training, and Workforce Support

- Targeted Commonwealth and State funding is needed to support culturally responsive training, compliance costs, and development for First Nations peoples, CALD communities, migrants, refugees, and people with disabilities.
- Training access could further be strengthened by aligning registration pathways with fee-free TAFE, paid traineeships, and workforce incentive grants.
- Workforce sustainability also depends on recruitment campaigns and employer incentives (e.g. wage subsidies, retention bonuses, paid training leave) that shift perceptions and improve sector attractiveness.

Ongoing Training and Sector Alignment

- Regular refresher training—similar to First Aid/CPR requirements—would help maintain competencies, especially in unsupervised or complex care environments.

- Aligning standards across aged care, disability, and veterans' care using a unified workforce framework would support consistency and reduce administrative burden.

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?

- Yes
- No
- Don't Know
    - ✓ I have another suggestion

Comment

Wyndham City Council supports a tiered registration scheme to reflect varying levels of qualification and experience.

Tiered Registration & Workforce Accountability

- Full registration would apply once minimum certification requirements are met.
- Provisional registration—under appropriate supervision—would allow new workers to train while working, increasing access for underemployed and unemployed individuals and addressing workforce shortages.
- A hybrid model that integrates AHPRA's CPD tracking with the portability of NDIS Worker Screening and employer-managed oversight would support national standards while reducing administrative burden.
- Employer-managed registration, supported by a national verification system and five-year renewal period (similar to NDIS and Working with Children Checks), would improve consistency, accountability, and sector capacity.

Submission on Design of National Registration Scheme for Aged Care Workers

Should the elements of a national worker registration scheme be the same across aged care, disability support and veterans' care?

- ✓ Yes
- No
- Don't Know
- I have another suggestion

What approaches would best support the mobility of workers between aged care and/or other care and support economy employers?

E.g., an electronic passport that could collect and store registration and skills information

Wyndham City Council supports a portable digital registration and workforce alignment model to enable efficient worker mobility across care sectors.

Portable Registration & Workforce Mobility

- A digital skills passport, similar to AHPRA's registration system for health professionals, would store registration status, qualifications, CPD history, employment records, compliance checks, and any conditions, suspensions, or revocations. Renewal notifications would support timely compliance and reduce delays.
- Employers would be required to verify digital registration and compliance documentation before a worker delivers care.

Aligning Workforce Conditions & Sector Sustainability

- Disparities in pay and qualification requirements—such as higher hourly rates for disability support workers operating under ABNs without formal certification, compared to aged care workers with defined training pathways—can contribute to workforce shifts and reduced retention. Aligning registration, pay, and training standards across aged care, disability, and veterans' care would support workforce mobility and sector stability.

Submission on Design of National Registration Scheme for Aged Care Workers

- Core qualifications need to be aligned across sectors, with sector-specific components retained to ensure compliance with the Aged Care Quality and Safety Commission and other relevant regulatory bodies.
- Commonwealth funded retention incentives, including wage subsidies, training support, and career pathways, would improve the competitiveness of aged care roles.
- A structured registration framework requiring ABN holders to register with an accredited oversight body would support stronger accountability, transparency, service quality, and regulatory compliance across the sector.

The below groups may face barriers through the implementation of a national worker registration scheme. Please select any group you would like to provide support suggestions or raise any additional considerations for.

Select all that apply

- ✓ First Nation Workers
- ✓ Migrant Workers
- ✓ CALD workers
- ✓ Workers with Disability
- ✓ Workers with low socio-economic backgrounds
- ✓ Regional, rural, and remote workers
- None of these

Comment
(Applicable for all priority groups)

Wyndham is one of Victoria's most culturally diverse municipalities, with over 50% of residents born overseas and more than 60% speaking a language other than English at home (ABS, 2021 Census). In the 2021 Census, 2,511 residents of the City of Wyndham identified as First Nations people, representing 0.9% of the local population. This positions Wyndham fifth among Victorian local government areas in terms of First Nations population size.

Submission on Design of National Registration Scheme for Aged Care Workers

The local population includes First Nations peoples, culturally and linguistically diverse (CALD) communities, migrants, refugees, older adults, and individuals from regional and rural backgrounds. This diversity is reflected across both the local care workforce and the community of care recipients.

Wyndham City Council recommends the following Commonwealth and state funded considerations:

- Financial assistance for low-income individuals to support training costs, unpaid placements and traineeships, and other entry-to-employment expenses.
- Culturally responsive training, including multilingual materials, bilingual trainers, interpreter access, trauma-informed content, and industry-specific English programs for CALD workers.
- Accessibility measures for people with disability, such as modified training delivery and reasonable accommodations for individuals with complex support needs.
- Foundational skills support for individuals with limited educational experience, including pre-training assistance and workplace-based learning to improve qualification completion and workforce entry.
- Flexible training delivery, including online, evening, weekend, and blended models to support carers, parents, and career changers.
- Gender diversity initiatives could help attract more men into the predominantly female care sector, including targeted outreach, sector rebranding, and promoting clear pathways into secure and meaningful employment.

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

Wyndham City Council supports a well-designed registration scheme that balances workforce accessibility, regulatory oversight, and service quality, while minimising barriers to entry and maintaining retention.

- Complex, costly, or administratively burdensome registration and Recognition of Prior Learning (RPL) processes may deter workforce entry—particularly for small providers and individual workers—and risk driving smaller community providers out of the sector due to compliance pressures.

Submission on Design of National Registration Scheme for Aged Care Workers

- Smaller providers, including community-based and CALD-focused organisations, may face increased compliance costs. Without sustainable Commonwealth funding and transition support, these impacts risk exacerbating workforce shortages and service gaps.
- Wyndham City Council recommends that the Commonwealth government provide targeted funding or incentives to support provider transition, ensuring the scheme enhances accountability and quality without placing undue financial or administrative pressure on employers or workers.

Submission on Design of National Registration Scheme for Aged Care Workers

Training requirements

Training is critical in supporting the professionalisation of workers.

Training provides greater opportunity for workers to explore career progression and mobility, and supports workers in having the right skills, knowledge and confidence to deliver safe and high-quality care and support services.

A registration scheme, with an ongoing training or continuing professional development requirement, was also recommended for personal care workers and disability support workers by the Royal Commission into Aged Care Quality and Safety and the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability.

Consultation approach

In this section, ongoing training requirements would relate to continual training that a personal care worker would need to undertake.

This section provides opportunities to provide feedback on policy and implementation settings.

What type of ongoing training requirement model should be considered?

Select all that apply

- ✓ Personal care workers should be required to undertake set specified skill sets, subjects, or shorter non-accredited training (for example, micro-credentials) to support national consistency
- ✓ Personal care workers should have an amount of continuing professional development hours to complete each year, to support workers to undertake relevant training and development opportunities based on their identified needs and preferences

- Aged care providers should be responsible for determining the training and development needs of personal care workers, and should provide professional development opportunities.

  ✓ Other

- Don't know

Comment
Wyndham City Council recommends a nationally consistent approach to mandatory training and continuing professional development (CPD) that supports workforce quality, equity, and accessibility.

Mandatory Training

- An independent oversight body would establish and monitor training standards in line with Aged Care Quality and Safety Commission (ACQSC) workforce competency requirements.
- Employers and sole traders would ensure compliance through structured professional development and verification before workers deliver independent care.
- Core mandatory training would include elder abuse prevention and reporting, ageism awareness, cultural competency, trauma-informed care, safeguarding, and risk management.
- Refresher training—modelled on First Aid and CPR renewal cycles—would help maintain current skills, particularly in complex or unsupervised settings.
- Training delivery needs to be inclusive, using multilingual resources, plain language materials, and assistive technologies to support CALD workers, people with disability, and individuals with low literacy and English proficiency.

Continuing Professional Development (CPD)

- A minimum of 10 CPD hours annually, consistent with registered disability worker requirements.
- CPD needs to be responsive to worker needs and preferences to support skill development and sector quality.

- Commonwealth-funded paid CPD opportunities are essential to reducing financial barriers and ensuring equitable access to ongoing professional development that supports sector quality.

Should ongoing training requirements be the same or different for workers employed in different aged care settings?

*For example, **in home care** and **residential aged care** would count as **different** aged care settings*

- Ongoing training requirements should be the same
- Ongoing training requirements should be different
- Don't know
    - ✓ I have another suggestion

Comment

Wyndham City Council recommends a nationally consistent training framework that includes tailored workplace-specific modules to reflect different care settings, aligned with ACQSC Standards and best practices in workforce development.

Workplace-Specific Training Requirements

Wyndham City Council suggests mandatory training include:

- Home Care Workers – Training in self-management, emergency response, medication administration, and high-risk care to support independent work.
- Residential Care Workers – Training in infection control, dementia care, complex needs, and medication administration within a regulated care environment.
- Agency Workers – Adaptive training in employer-specific compliance requirements to support transitions across care settings.
- Independent Contractors or Sole Traders – Training delivered by accredited organisations to support quality oversight and regulatory compliance.

Submission on Design of National Registration Scheme for Aged Care Workers

wyndhamcity
city. coast. country

What types of implementation support should be introduced to aid the introduction of training requirements?

Wyndham City Council recommends that the Commonwealth Government fund nationally consistent, inclusive training implementation supports—with state co-investment where appropriate—to ensure equitable access and workforce participation, particularly for diverse and underrepresented groups in aged care.

Equitable and Inclusive Training Access

- Targeted supports for First Nations peoples, CALD communities, migrants, refugees, rural workers, and people with disability to improve access to training, registration, and workforce participation.
- Recommended measures include subsidised training, flexible pathways, Recognition of Prior Learning (RPL), culturally safe and multilingual materials, mentorship programs, regional workforce incentives, and targeted employment pathways.
- Training delivery should reflect cultural values and care practices, particularly for First Nations communities, to ensure respectful and responsive care.
- Additional study time allowances may assist First Nations and rural workers where training access is limited.
- Multilingual support—such as interpreters, bilingual trainers, and plain English materials—would assist CALD workers and those with varying literacy levels.

Flexible and Accessible Training Delivery

- Flexible delivery options—including blended, self-paced, after-hours, and weekend models—would support workers balancing employment, study, and care responsibilities.
- Employer-led training programs would help streamline placements, pre-registration requirements, and professional development pathways.

Paid Placements and Employer Incentives

- Commonwealth-funded paid placements would reduce financial hardship and support qualification completion.
- Incentives and subsidies for providers—particularly those supporting diverse or priority cohorts—would help offset the cost of training and onboarding, and support long-term workforce retention.

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

Please note:

- The care and support economy includes aged care, disability support, veterans' care and early childhood education and care sectors. There are similar challenges, requirements, and shared workforce opportunities across these sectors.
- More information on the care and support economy and on opportunities and additional considerations can be found in the consultation paper.
  Please provide your response below.

Comment

Wyndham City Council recommends a nationally coordinated, Commonwealth-funded approach to expanding training requirements across the care and support economy to promote consistency, workforce mobility, and equitable access.

Aligning Training and Workforce Mobility

- Standardising minimum training and qualification requirements across sectors would support workforce mobility, consistency, and sector reputation, while sector-specific competencies would ensure service quality is maintained.
- While ECEC shares workforce challenges with aged care, its distinct educational focus means direct mobility is complex. To protect aged care quality, Wyndham City Council recommends that an aged care oversight body define and oversee sector-specific competencies.
- Nationally aligned registries and baseline qualifications would reduce duplication, support safe transitions between sectors, and help build a more flexible, responsive care workforce.

Accreditation and Quality Assurance

- A national peak body should oversee accreditation, ensuring only accredited Registered Training Organisations (RTOs) deliver required qualifications to maintain consistent standards, safeguard service quality, and ensure workers meet sector expectations.

Workforce Retention and Support

- Alignment in wages, career development, and professional recognition across care sectors would reduce attrition and support retention without causing workforce imbalances.
- Commonwealth-funded expansion of permanent roles, employment benefits, and paid CPD opportunities would improve workforce stability across the aged care sector.
- Addressing cultural and language barriers, visa restrictions, and training costs is essential to supporting equitable participation of a diverse workforce.
- Commonwealth-funded supports—such as subsidised training, language programs, and visa pathways—would promote inclusion and retention, especially for migrant workers.

Rural and Regional Workforce Development

- Commonwealth-funded, place-based workforce initiatives can help address care worker shortages in growing areas such as Little River, Mambourin, and Wyndham Vale by responding to local demand and access barriers.
- Collaborative efforts between governments, local TAFEs, RTOs, and community organisations can support the delivery of accessible, culturally appropriate training to strengthen rural and regional workforce supply.
- Commonwealth-funded flexible training models (e.g. blended or mobile delivery), along with incentives such as relocation support, housing assistance, and retention bonuses, can enhance workforce attraction and retention in outer-urban and regional areas, with potential co-investment from state governments.

What transition timeframes, or phasing arrangements, should be considered to support the successful implementation of training requirements?

A phased approach over 2–3 years is recommended to prevent disruptions to workforce supply and allow for a smooth transition. This timeframe aligns with the average duration (12–18 months) required to complete full-time qualifications such as the Certificate III in Individual Support (Ageing),

Submission on Design of National Registration Scheme for Aged Care Workers

Certificate III in Individual Support (Home and Community Care), and Certificate IV in Ageing Support. It also allows new training requirements to be implemented with the next incoming workforce cohort.

Aside from training requirements, what else would best support the uplift and uptake of aged care training opportunities for personal care workers?

Select all that apply

- ✓ *Direct government funding and provision of additional online short courses and resources for personal care workers (e.g., building on existing available short courses through the Equip Aged Care Learning Packages program)*
- ✓ *The aged care sector should explore the development of a professional network that could support the promotion of high-value training opportunities, provide peer mentoring, and support professional development opportunities*
- ✓ *The aged care sector should explore portable training opportunities for personal care workers working across multiple providers*
- ✓ *The aged care sector should explore avenues to better support backfilling for staff undertaking training, peer support and mentoring, and supervision costs for personal care workers interested in undertaking additional relevant care and support training*
- *Don't know*
- ✓ *Other*

Comment

Wyndham City Council supports the above strategies and recommends they be expanded through a nationally coordinated, Commonwealth-funded approach to address financial, structural, and access-related barriers to aged care training participation.

Professional Networks and Workforce Recognition

- A sector-wide professional network—supported by the registration oversight body—can enhance sector identity, promote high-value training, and facilitate peer mentoring.

Submission on Design of National Registration Scheme for Aged Care Workers

- Embedding training within a national registration framework would support formal career recognition and strengthen workforce capability.

Portable and Transferable Training Pathways

- National training records (e.g. digital passports) and CPD portability across employers and sectors would support mobility without duplicating effort.
- Recognising shared competencies across aged care, disability, and veterans' care—while maintaining sector-specific standards—would protect quality while expanding opportunities.

Commonwealth-Funded Workforce Incentives

- Fully funded Certificate III and IV qualifications would remove financial barriers for new and existing workers.
- Supports such as paid placements, traineeships, study leave, and wage subsidies would encourage retention, particularly among low-income and underemployed workers.
- Dedicated funding for backfilling, supervision, and mentoring could reduce workforce disruption and improve training participation.

Inclusive and Flexible Delivery

- Online, blended, and employer-supported formats would enable broader participation, particularly for those managing work, family, or care commitments.
- Culturally and linguistically appropriate resources—including bilingual trainers and plain English content—would improve access for CALD and migrant communities.
- Recognition of overseas qualifications through bridging programs would help skilled international workers enter the aged care sector efficiently.

Sector Collaboration

- Strong partnerships between aged care providers, governments, RTOs, unions, and community organisations would ensure training is aligned with real-world workforce needs, particularly in diverse communities such as Wyndham.

Submission on Design of National Registration Scheme for Aged Care Workers

Skills and qualification requirements

Currently there is no formal industry standard for an entry-level qualification, or required skills, to work as a personal care worker in aged care. This is similar for disability support workers employed in the disability support sector.

A range of veterans' care and support programs already include qualification and skills and training requirements for personal care and nursing support workers. Workers delivering Veteran's Home Care services (except for domestic assistance and home, garden maintenance) and personal care workers delivering personal care under Community Nursing have a requirement to hold a relevant Certificate III.

The Royal Commission into Aged Care Quality and Safety recommended that there should be a mandatory minimum qualification for personal care workers performing paid work in aged care, and that this qualification should be a Certificate III. Data from recent aged care workforce collections indicate between 48 and 66 per cent of personal care workers hold a Certificate III, or higher-level qualification, related to their work.

The National Disability Insurance Scheme Provider and Worker Registration Taskforce recommended that a registration scheme to support disability support workers should include a worker training and qualifications framework (including minimum training and qualification requirements).

There are also a range of other important skills, including English language and communication skills that have been recommended through reviews and inquiries in recent years.

Mandatory skills and qualification requirements would provide greater assurance to older people, and the community more broadly, that workers have minimum-level knowledge and skills in the delivery of safe and high-quality care. This would also support having a more professional, confident and valued workforce with the right skills and knowledge to meet the needs and rights of older people.

Consultation approach

In this section, the skills and qualification requirements would relate to specific skills, or qualifications, that a personal care worker would need to hold, or undertake.

Submission on Design of National Registration Scheme for Aged Care Workers

This section provides opportunities to provide feedback on policy and implementation settings. Final policy and implementation settings are subject to government consideration

If the government was to establish mandatory minimum skills and qualification requirements for personal care and/or disability support workers, what minimum skills and qualifications should be considered?

Please list all minimum skills and qualifications that come to mind.

Wyndham City Council recommends the following minimum qualifications and skills to ensure consistent, safe, and high-quality care across settings:

Foundational Qualification

- Certificate III in Individual Support (Ageing, Disability, or Home & Community Care) as the minimum entry requirement.
- To support workforce attraction and retention, this qualification should be fully funded and fee-free, with paid placements to reduce financial barriers for new entrants.

Core Skills Aligned to ACQSC Standards

- Mandatory training should align with Aged Care Quality and Safety Commission (ACQSC) standards, including: elder abuse prevention and reporting, ageism awareness, trauma-informed care, risk management and safeguarding, infection prevention and control, and First Aid and emergency response.

Setting-Specific Training

Training needs to be tailored to the care setting to ensure workers are prepared for the demands of their environment:

- Home care workers: Self-management, high-risk care, medication administration, emergency response.
- Residential care workers: Infection control, dementia care, complex care needs, medication administration.

- Agency-based workers: Workplace safety, adaptability, compliance with varying employer policies.
- Sole traders: Business compliance, client rights, and professional accountability.

Should there be different requirements for new workers compared to workers who already work in aged care, disability support or veterans' care?

- ✓ Yes
- No
- Don't

Comment

Wyndham City Council supports differentiated requirements for existing and new workers to ensure fairness, workforce continuity, and sector inclusivity.

- A nationally consistent Recognition of Prior Learning (RPL) process, overseen by an independent regulatory body (e.g. ASQA or a national workforce commission), enables transparency and equitable access across care settings.
- A legacy exemption can recognise existing workers through RPL, while internationally trained workers may enter via a supported bridging program.
- RPL pathways may be supported through employer-funded assessments and tailored equivalency frameworks to accredit existing expertise without duplication.
- New entrants will be required to meet mandatory minimum qualifications before gaining full registration, ensuring consistent care standards, workforce readiness, and consumer protection.
- Accessible, supported upskilling pathways for current workers help avoid displacement and maintain continuity of care.

Should personal care workers be able to undertake study to attain a mandatory qualification while employed?

- ✓ **Yes,** personal care workers should be supported to attain their qualification while employed in the aged care sector

- **No,** personal care workers should demonstrate meeting the minimum qualification requirement prior to being employed in the aged care sector
- Don't know

Comment

Timeframes

Wyndham City Council supports enabling personal care workers to undertake study while employed, recognising this as essential for participation, inclusion, and workforce sustainability.

Wyndham City Council supports allowing personal care workers to complete mandatory qualifications within 24 months under provisional registration, supported by flexible, blended, or competency-based training. Workplace-integrated study minimises disruption to shifts and personal commitments, improving participation and retention. To ensure safety and care quality, provisional workers may be restricted from tasks such as administering medication or working unsupervised, with supervision and mentoring in place to support learning and workforce development.

Study Load

Potential Job Role Limitations

- Paid placements, traineeships, and funded study leave enable workers to upskill without financial hardship or job disruption, supporting retention and attracting new entrants—particularly those from low-income or underqualified backgrounds.
- Employers can coordinate supported training pathways, including supervision and mentoring, to maintain care quality and continuity.
- On-the-job learning opportunities also support career development and formal recognition of care roles within a structured pathway.

Submission on Design of National Registration Scheme for Aged Care Workers

Minimum English language and communication skills are often recommended for workers, including by the Royal Commission into Aged Care Quality and Safety. Would the introduction of a mandatory minimum qualification meet this recommendation?

- ✓ Yes
- No
- Don't know

Please explain your response in the box below.

A mandatory qualification can strengthen communication across the aged care workforce by ensuring workers have the English proficiency needed to follow care plans, uphold safety, and engage respectfully with older people, families, and colleagues. Wyndham City Council recognises that many workers come from CALD backgrounds and recommends training delivery include plain English materials, common community languages, and alternative formats to support equitable access. English proficiency may be assessed during training rather than as a precondition, to avoid unnecessary barriers. Multilingual workers who demonstrate English proficiency and contribute additional language skills provide significant value and merit appropriate recognition.

What supports and/or exemptions should be put in place to minimise risk of direct and indirect discrimination from a mandatory minimum English language proficiency requirement?

Wyndham City Council supports inclusive approaches that ensure communication standards are met without creating barriers for culturally and linguistically diverse (CALD) workers.

- Commonwealth-funded, workplace-based language support can assist workers in building English proficiency while continuing to deliver care.

- Wyndham City Council recognises proficiency in multilingual skills as a workforce asset and supports appropriate remuneration where these skills contribute to quality care delivery
- Additional time, tutoring, and targeted training support, funded through national workforce development initiatives, can help workers from non-English-speaking backgrounds meet language requirements equitably.
- Alternative communication training and plain English materials, developed in partnership with RTOs and funded through Commonwealth or co-invested state programs, can support workers with lower literacy to meet safety and care standards.

What types of support should be considered to assist with the successful implementation of any skill or qualification requirement for personal care workers employed in the aged care sector?

Wyndham City Council supports a coordinated approach that removes barriers to meeting skills requirements, promotes equity, and strengthens provider participation.

- Commonwealth-funded, fee-free qualifications and financial assistance would ensure cost is not a barrier to meeting skills requirements.
- State-funded traineeships or paid placements can incentivise employers to support skill development without service disruption.
- Recognition of Prior Learning (RPL) pathways are essential to formally recognise experienced and overseas-accredited workers.
- Targeted support for workers returning to education, including mentoring and peer programs, would help improve skills acquisition and workforce retention.
- On-the-job and flexible study options—such as online, part-time, and employer-supported learning—enable workers to meet skills requirements while employed and accommodate personal commitments.

Submission on Design of National Registration Scheme for Aged Care Workers

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

E.g., should the same mandatory minimum skills and qualification requirements apply for personal care and disability support workers across aged care, disability support and veterans' care?
Qualifications across aged care, disability support, and veterans' care should be aligned to allow workforce mobility.

Wyndham City Council recommends aligning qualifications across aged care, disability support, and veterans' care to promote workforce mobility and consistency.

- Standardised training pathways and reciprocal recognition would allow workers to transition between sectors without the need for retraining.
- Following the Federal Budget's $2.6 billion investment in aged care nurse wages, continued and equitable investment in all care roles is crucial. Wage increases and financial incentives, such as retention bonuses and wage supplements, would attract and retain skilled workers across all sectors.
- A shared investment model, with sustained Commonwealth Government support alongside provider contributions, may help ensure fair remuneration and a stable workforce, especially in regional and growth areas.
- Flexible, nationally recognised training requirements and an adaptable centralised RPL system would ensure consistency and support workforce development across the care economy.

What types of implementation support should be considered to aid the introduction of any skill or qualification requirement?

E.g., supports for First Nations workers, migrant workers, culturally and linguistically diverse workers, workers with disability, workers from low socioeconomic backgrounds, or workers in regional, rural and remote settings.

Comments:

Wyndham City Council recommends a coordinated approach with targeted funding and investment across all levels to ensure equitable workforce entry and retention.

- Sustainable funding for local governments would support community-based training, workforce pathways, and job placement services, particularly for First Nations and CALD communities. This includes paid study leave, workplace-integrated training, mentorship programs, and compliance support to strengthen workforce participation in diverse communities.
- Commonwealth and State funding for fee-free training, subsidised qualifications, paid work placements, wage subsidies, and retention bonuses would support workers in completing qualifications without financial hardship.
- Employer grants from the Commonwealth and State would help offset upskilling costs, implement career pathways, and ensure compliance with workforce requirements.
- Culturally appropriate training, language support, adaptive formats, and flexible, fee-free learning options would facilitate successful qualification completion and workforce entry for First Nations, CALD, low-socioeconomic, people with disability, and regional workers.

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?

Wyndham City Council supports workforce quality through skill-based requirements, with considerations to ensure sufficient supply.

Recognition of Experience & Workforce Mobility

- Legacy provisions and RPL pathways would retain experienced workers and reduce redundant upskilling. A renewable skills passport would enable workers to move flexibly between sectors, streamlining credential verification and reducing administrative burdens.

Flexible Training & Employer Support

- Flexible training, including workplace-integrated learning and study while employed, would allow workers to complete qualifications without leaving the workforce. Commonwealth and State funding for subsidised training and employer incentives would reduce financial barriers.

Targeted Support for Priority Workforce Groups

- Specialised programs for First Nations, CALD, migrant, refugee, people with disability, and rural or low-income workers, alongside culturally safe training, financial assistance, and flexible learning options, would improve access and retention.

Submission on Design of National Registration Scheme for Aged Care Workers

Skilled Migration & Workforce Sustainability

- Priority visa pathways recognising aged care qualifications would address workforce shortages while ensuring quality.

PRIVACY NOTICE - CONSENT TO PUBLISH

If you consent, the Department may, at its discretion, publish part or all of your submission on the Department's website. Please note that your email address will not be published and responses may be moderated to remove content that is inappropriate/offensive or contains sensitive information.

Submissions which have been published on the Department's website can be accessed by the general public, including people overseas. Ordinarily, where the Department discloses personal information to an overseas recipient, Australian Privacy Principle (APP) 8.1 requires the Department to take reasonable steps to ensure that the overseas recipients do not breach the APPs. However, if you consent to the publication of your submission, APP 8.1 will not apply to this disclosure and the Department will not be accountable under the Privacy Act for any subsequent use or disclosure of the submission by an overseas recipient, and you will not be able to seek redress under the Privacy Act.

You should not include information in your submission about another individual who is identified, or reasonably identifiable. If you need to include information about another individual in your submission, you will need to inform that individual of the contents of this notice and obtain their consent to the Department collecting their personal information.

You can get more information about the way in which the Department will manage your personal information, including our privacy policy, on our website.

You can obtain a copy of the Department's privacy policy by telephone on (02) 6289 1555 or freecall 1800 020 103 or by using the online enquiries form at Australian Government Department of Health and Aged Care.

Your personal information is protected by law, including the Privacy Act 1988 (Privacy Act) and the Australian Privacy Principles, and is being collected by the Department for the purposes of conducting a consultation survey on a national personal carer registration scheme in aged care. The Department will collect the information provided in this survey upon the submission of your responses.

Do you consent to your submission being published?

✓ Yes