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National Registration Scheme to Support Personal Care Workers Employed in Aged Care

National Seniors Australia (NSA) welcomes the opportunity to provide feedback on the design of the National Registration Scheme to Support Personal Care Workers employed in aged care.

As the peak consumer body representing older Australians, with over 255,000 members and supporters, NSA works to improve the well-being of all older Australians.

Establishing a national registration scheme will ensure that Personal Care Workers (PCWs) are adequately equipped to meet their obligations under aged care regulations. Structured continuous professional development requirements will enhance the skills and knowledge of PCWs. The benefits of such a scheme will provide the basis for building the required capability for quality care for older Australians and will restore consumer trust in the aged care system.

PCWs in the aged care sector are often undervalued in comparison to other professions. Given the increasing reliance on these workers, it is critical that PCWs' skills, training and career pathways are formalised.

NSA recommends the following inclusions to be considered and incorporated into the National Registration Scheme to Support Personal Care Workers Employed in Aged Care.

NSA Recommendations

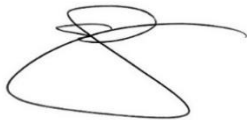
- 1) Develop a publicly accessible register that clearly demonstrates PCW's compliance with registration requirements and supports the Aged Care and Quality & Safety Commission's (ACQSC) safeguarding functions to promote continuous registration improvements.
- 2) Requirements on aged care providers to gather and maintain all registration documents for PCWs.
- 3) Integrate dementia care training into the base qualifications required for a national registration scheme.
- 4) Establish a progressive development model to enable personal care workers to start their roles without formal qualifications and to upskill through ongoing professional development with checks and balances to ensure they are working towards achieving a minimum Certificate III qualification.

Further detail to support our recommendations are provided overleaf.

Fostering continuous improvement in the personal care workforce by enhancing professionalism and expanding career opportunities will promote quality and safe care for older Australians. This will ensure that PCWs are fully equipped with the necessary skills and knowledge to address the current and future demands of aged care.

Should you require further information or input, please contact Ms Jacintha Victor John, Senior Advisor Aged Care & Health, via policy@nationalseniors.com.au.

Yours sincerely,



Chris Grice
Chief Executive Officer

Responses to select questions in the consultation paper

1. Should there be a public register where people can see that a personal care worker has met their registration requirements?
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?
 - a. If personal care workers should provide evidence and information to a regulatory/professional body, what should that regulatory/professional body look like?
 - b. If service providers are responsible for collecting evidence, what additional support and regulatory approaches would be required?

Yes. The [Australian Health Practitioner Regulation Agency \(AHPRA\)](#), the [National Disability Insurance Scheme \(NDIS\)](#) and the recently implemented Provider Registration Scheme all maintain a public register of registered health practitioners and providers and the same should be applied to PCWs in the aged care sector.

The [Code of Conduct for Aged Care](#) sets national standards for behaviour. However, the responsibility for determining the necessary skills for PCWs to meet these standards and assessing their competence is almost entirely left to individual providers and workers. There is currently no systemic recognition of the skills and knowledge required by workers.

We propose that a public register for PCWs be established that complies with current regulations and provider registration systems. This register will ensure ongoing quality and safety within the aged care system. It will allow individuals to verify that PCWs have met their registration requirements and provide consumers with easy access to information about registered PCWs.

Additionally, establishing a public register will ensure that PCWs adhere to expected behaviours and obligations.

This measure will also prevent individuals who do not meet registration criteria from entering, continuing, or participating in roles within the aged care sector.

Under the Aged Care Act 2024, S349, the Aged Care and Quality & Safety Commission is responsible for safeguarding functions that promote continuous improvement for registered providers and aged care workers. As such, a PCW is considered a direct care staff member of a registered provider.

Aged care providers play a crucial role in supporting PCWs by actively collecting registration evidence and efficiently gathering and managing all necessary documents. This process helps maintain high standards of care and compliance within the industry, and is overseen by the Australian Aged Care Quality & Safety Commission (ACQSC).

By implementing a national public register, providers can continue to fulfil their obligation to deliver safe, high-quality care while also collecting the necessary evidence to meet registration requirements. This initiative will enhance transparency and build trust in the quality of care provided to older Australians.

Recommendation 1: Develop a publicly accessible register that clearly demonstrates PCW's compliance with registration requirements and supports the Aged Care and Quality & Safety Commission's (ACQSC) safeguarding functions to promote continuous registration improvements.

Recommendation 2: Requirements on aged care providers to gather and maintain all registration documents for PCWs.

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)? 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?

Yes, there should be different requirements for PCW employed in different settings.

The national worker registration scheme should provide minimum qualification standards but encourage the attainment of higher-level skills commensurate with the role in which a worker is employed, rather than the setting.

In this regard, PCWs should have baseline qualifications to handle clients with conditions, such as dementia, given its high prevalence among those receiving care.

It is estimated that two-thirds of Australian aged care residents are living with moderate to severe cognitive impairment. PCWs comprise [70 per cent of the direct care workforce](#), and currently, the minimum qualification for a PCW involves [no compulsory units in dementia competency](#).

While a significant proportion of spending within the residential aged care setting is directly attributable to the diagnosis, treatment and care of people with dementia, support for people with dementia also occurs in the home care setting. As such, staff need to have an appropriate level of knowledge and skills in dementia care regardless of setting.

There is increasing [international recognition](#) of the need for high-quality, specialised training and education in dementia care that adheres to quality and safety standards. This emphasises the importance of having a well-educated and skilled workforce. [Research shows](#) when people living with dementia receive care from PCWs specifically trained in dementia care, they experience fewer incidents of changed behaviour.

The Aged Care Act 2024 [Section 152-35](#) requires aged care workers of registered providers “*must have appropriate qualifications, skills or experience to provide the funded aged care services that the provider delivers to individuals.*” Providers are required to take actions to achieve this outcome by engaging the right people, ensuring workers have access to supervision, support and resources, and providing workers with competency-based training. These requirements appear to be little different from those in place before the [Aged Care Royal Commission](#) (The Royal Commission).

The Royal Commission found aged care workers often [“lack sufficient skills”](#) to cater for the needs of older people and find it difficult to retain appropriately skilled people due to low wages. Reliance on

employers to ensure workers are adequately trained has proven to be ineffective to date without mandatory qualification requirements.

The [National Dementia Education and Training Standards Framework \(NDETSF\)](#) should be incorporated within PCW professional development to support the delivery of national dementia education and training to ensure quality person-centred care to support people living with dementia. The aged care workforce should be equipped to deliver appropriate education, training, skills and attributes to provide quality care for older people, especially people with dementia, who frequently have complex care needs.

NSA has long [advocated for improved training in dementia care](#) for medical and aged care staff. We recommend incorporating dementia care training as part of a progressive development training pathway for PCWs (see below).

Recommendation 3: Integrate dementia care training into the base qualifications required for the National Registration Scheme.

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.
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?
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)?

The Aged Care [Royal Commission's recommendation 77](#) to establish a national registration scheme for aged care workers is intended to add additional safeguards to manage the risk of harm to older people and further professionalise the aged care workforce. The PCW registration scheme is an important mechanism in addressing risk of harm to older people in their homes and residential aged care settings as recipients of aged care services.

Recommendation 78 states that obtaining a Certificate III should be the minimum qualification required for PCWs in the aged care sector. Currently, it is common practice for workers to complete a Certificate III, although it is not mandatory. A move towards mandatory and coordinated accreditation will allow the aged care industry to recognise PCWs' skills, boost job satisfaction, and make the industry more attractive as a long-term career.

However, the risks and possible negative consequences of introducing mandatory minimum qualification requirements include restricting occupational entry, increasing worker exits, and potentially causing regulatory alignment issues with other schemes.

We are particularly concerned about the potential lack of alignment with the National Disability Insurance Scheme (NDIS). In September 2024, the Australian Government progressed a new registration system for the NDIS that will better support participants through stronger regulation of providers. The [2023 Royal Commission Final Report into Violence, Abuse, Neglect and Exploitation of People with Disability \(Disability Royal Commission\)](#) recommended a national disability support worker registration scheme be established by 1 July 2028. However, under the NDIS, no formal qualifications are required to become a disability support worker, and there is no minimum educational requirement. In fact, [around 11% of NDIS support workers](#) in Australia have achieved Year 10 or lower in their education.

Introducing PCW minimum qualifications and CPD requirements may adversely impact the aged care labour market, as potential aged care workers may choose instead to enter the disability support workforce if qualification requirements are lower. This will negatively impact worker attraction and retention in aged care. Considering the challenges the aged care sector faces in attracting and retaining skilled workers, we do not want this requirement to create additional obstacles for workforce development now or in the future. Ideally, the qualification requirements for aged care and disability care should be aligned to provide a larger pool of suitably qualified workers across both sectors.

We recommend implementing a progressive development approach, a model similar to the Victorian [Assistant Workforce Model \(VAWN\)](#) for Certificate III, to enhance support for personal care workers in the aged care system and promote their development. This model focuses on providing staff with opportunities to learn and develop their skills through various means, including formal and informal learning, in-house education, and external study. This can be achieved by offering essential training and development opportunities to PCWs while they are on the job.

This will enable workers to gain valuable experience in the sector while completing their qualification within 12 months, ultimately benefiting both the workforce and older Australians. This approach presents PCWs with an opportunity to begin their roles without formal qualifications and to upskill through ongoing professional development, providing clear pathways to achieve Certificate III, Certificate IV, and higher-level qualifications. By doing so, workers will be better equipped to provide the quality standard of care that older Australians deserve.

Furthermore, micro-credentialing focusing on shorter, specific skill sets will assist PCWs in acquiring new skills. Short courses in aged care and targeted training aimed at personal care and mobility assistance will enhance workforce readiness and address existing skills gaps. The current progressive development trend is shifting towards ongoing training and professional development to ensure that personal care workers are equipped with the skills and knowledge necessary to provide quality care, particularly in areas such as dementia care and palliative care.

Ideally, qualifications should be linked to worker remuneration and funding to ensure there is an incentive for workers and providers to progress workers skills.

to enable personal care workers to start their roles without formal qualifications and to upskill through ongoing professional development.

Conclusion

NSA strongly believes that PCWs must be adequately skilled to deliver quality care safely and to fulfil their responsibilities under aged care regulations. A key advantage of this approach is the long-term social and economic benefit of having a better-trained, more motivated, stable, and ultimately better-paid workforce in aged care.

NSA's four key recommendations thoughtfully align with the Royal Commission's proposals. These recommendations focus on developing a highly skilled and respected aged care workforce.

We aim to promote a framework of effective regulations, enhanced training in dementia care, and well-defined career pathways. It also highlights the importance of strengthening provider regulation and accountability, alongside the establishment of a public register to foster transparency and build trust in aged care services

A modern approach, where PCWs are supported and rewarded for remaining in the sector while progressively building their skills will benefit care recipients, aged care workers, providers, the government, and the broader community. Given the increasing pressure on the aged care workforce, practical actions should be taken to provide PCWs with clear pathways for career development and alignment with registration for similar sectors such as the disability care sector.

The National Registration Scheme for Personal Care Workers, combined with a progressive development model in the aged care system, offers critical benefits that should not be overlooked. Relying primarily on employers to develop workers' skills through training and supervision has proven ineffective. This approach ensures a more responsive and stable system that effectively addresses the increasing demand and complex needs within aged care facilities.

Most importantly, it is essential for restoring consumer trust in the aged care system and for delivering the quality of care that is the right of all older people who need it