



**TAFE  
DIRECTORS  
AUSTRALIA**

## **SUBMISSION**

Australian Government: Department of Health and  
Aged Care

---

# **DESIGN OF A NATIONAL REGISTRATION SCHEME FOR PERSONAL CARE WORKERS IN AGED CARE**

---

**17 April 2025**

### **About TAFE Directors Australia**

[TAFE Directors Australia \(TDA\)](#) is the national peak body that represents Australia's network of state and territory publicly owned Technical and Further Education (TAFE) institutes and university TAFE divisions. All TAFE institutes and TAFE divisions of dual sector universities across Australia are [members of TDA](#). TDA members range from the largest registered training provider in Australia, TAFE NSW to regional TAFEs with significant geographical coverage such as North Regional TAFE (WA). The primary business of TDA members is vocational education and training focusing on nationally accredited qualifications and skill sets, non-accredited training for bespoke employer purposes, and foundation skills. Over half of TDA members also deliver higher education.

**TAFE Directors Australia**

35 Vowels Cres

BRUCE ACT 2617

[ceo@tda.edu.au](mailto:ceo@tda.edu.au)

**[www.tda.edu.au](http://www.tda.edu.au)**

## Introduction

Thank you for the opportunity to provide feedback on the design of a national registration scheme for personal care workers in aged care. TDA's submission has been prepared through consultation with three TDA policy networks: 1) the TAFE Aged Care Taskforce (TACT); 2) the National Enrolled Nurse Advisory Council (NENAC); and 3) the TDA National Advisory Council for Allied Health. The networks are formed from a national membership of TAFE educators and managers with expert knowledge in the health, aged care, and personal care and support work.

## National worker registration scheme design

TDA supports the development of a public register for personal care workers as a means of enhancing transparency and public safety. This approach is comparable to the model that exists for nursing and other health professions which is administered by the Australian Health Practitioners Regulatory Association (Ahpra).

Personal care workers provide support to Australia's most vulnerable, and in the case of home-based services, support and care may be provided in the person's home. There is considerable risk associated with such service provision, and a readily accessible register would allow service organisations and service users to verify a worker's registration status, confirm their identity, and ensure there are no existing restrictions or ongoing investigations that might compromise safety.

Ideally, personal care workers should be empowered to collect and provide their own evidence to fulfil registration requirements. This is consistent with established registration practices for other professionals, and is particularly important for the personal care workforce, which includes sole traders and workers with multiple employers. Situating this responsibility with individual workers provides them with control of the nature and portability of documentation stored, regardless of their employment arrangements.

### Suggestions for the design and function of the regulatory/professional body

If a regulatory/professional body is established for personal care workers, TDA suggests that it should:

- maintain a register of personal care workers, holding evidence of their qualifications, training, and criminal history checks;
- set clear standards for professional development and ongoing education

- hold authority to impose sanctions, including suspension or revocation of registration, for breaches of conduct; and
- enable public access to the register, allowing individuals to verify the credentials of personal care workers.

Given the mobile nature of the workforce, a national framework is essential to ensure consistency in standards and regulations across all states and territories.

### Recognition of other regulatory schemes

Any new registration scheme should avoid duplication of existing schemes relevant to the diverse personal care workforce. For example, some care/support workers in aged care and disability services hold the *Certificate III or IV in Allied Health Assistance* and maintain registration with the Allied Health Assistants' National Association (AHANA), a peak body with established mechanisms to ensure quality and safety for consumers. The scheme's design, implementation and regulation should seek to harmonise inter-professional registration where possible.

### Responsibility for supplying evidence

TDA recommends that the model requires individual workers, rather than service providers, to supply evidence supporting registration and compliance. Clear, nationally consistent guidelines should be developed in relation to the evidence to be collected, how it should be verified, and how long it must be retained. Guidance information should ideally include templates and digital systems for efficient and secure storage. A user-friendly application that can be accessed via a mobile device is recommended.

### Different registration categories

A system which accommodates provisional and full registration of personal care workers would be beneficial.

**Provisional registration** would allow those in training to work under supervision, ensuring safety while gaining experience and completing an approved qualification. To gain provisional registration, new entrants should be required to enrol in an accredited Skills Set which addresses important concepts such as work health and safety; infection control; communication; critical legal and ethical considerations; basic personal care skills; and the principles of strengths-based approaches. An accredited Skills Set should be designed for this purpose by HumanAbility (Jobs and Skills Council for human services) in consultation with industry and educators.

**Full registration** should be applied once the accredited Skills Set is complete, or to those who already hold a relevant Certificate III level qualification. Suggested Certificate III qualifications include (for example):

- Certificate III in Individual Support
- Certificate III in Health Services Assistance
- Certificate III in Allied Health Assistance.

This approach is recommended as it addresses workforce needs, provides structured support for trainee workers, and maintains quality through pathways and accountability.

### Registration requirements for different care settings

There should be a core set of consistent requirements for all personal care workers to ensure a baseline level of safety and competency – regardless of the setting in which the work is carried out.

The responsibilities and tasks carried out in different roles and contexts should be reflected in the range of qualifications approved for registration as a personal care worker, and Continuing Professional Development (CPD) requirements could be tailored to specific settings. This allows for targeted, setting-specific education and skill development, while still maintaining worker mobility across aged care, disability, and other sectors. For example, disability support workers may need training in new assistive technologies, while aged care workers may need updates on dementia care best practices. Veteran care workers may need CPD on new and emerging mental health treatments. Workers should have choice in the CPD that they undertake and complete.

### Supporting the mobility of workers between employers

To enhance worker mobility in aged care and related sectors, TDA recommends a combination of strategies:

- **Digital Credentials:** An electronic passport to store and share qualifications and skills.
- **National Skills Framework:** Standardised skill recognition for easy transfer between sectors.
- **Portable Training:** Modular, accessible training for flexible upskilling.
- **Interoperable Platforms:** Seamless data exchange between employers and regulators.

### Barriers and challenges that may be experienced by diverse workers.

Supporting the development of a diverse personal care workforce is important to meet workforce shortage challenges and to enhance the experience of the diverse client group that access support care services.

However, culturally and linguistically diverse workers, regional, rural or remote workers, workers with disability, and workers from low socioeconomic backgrounds are more likely to experience barriers in accessing and managing compliance requirements of a national registration scheme.

Additional supports may be required through the administration of the scheme to ensure that less advantaged groups have access to the technological and educational requirements needed to attain and maintain registration.

### **Likely impacts of a registration scheme on providers of care and support services**

A national worker registration scheme will have significant short- and longer-term impacts on service provider organisations. Care must be applied in the scheme's introduction to minimise workforce impacts, and subsequent flow-on impacts to service users. There will need to be a thorough program implementation plan developed in consultation with stakeholders and targeted communication for service providers, workers and their clients.

#### **Increased administrative burden**

Introduction of the scheme will represent an additional administrative burden for service providers. For example, employers will need to adapt their recruitment and onboarding processes, verify the registration status of existing and new workers, and maintain a system to record worker registration compliance.

#### **Increased costs**

Providers may incur costs to support workers in meeting registration requirements, such as providing training or managing background checks. They may also incur costs associated with developing and maintaining a system to manage records of worker registration compliance.

### **Expected long-term benefits of a national registration scheme**

While the introduction of a national registration scheme will create challenges upon implementation, the longer-term impact is expected to be positive, with significant future benefits to the sector, personal care workers, and service users. Registration will ensure a baseline level of competency and accountability, leading to improved quality of care. It will contribute to raising the professional status of personal care workers, attracting and retaining a more skilled workforce. Registration will provide greater assurance to clients and their families that workers are qualified and vetted.

## **Skills, training and qualifications**

TDA recommends that a nationally agreed Skills Set should be the minimum required for full registration of a personal care worker under the national registration scheme. In addition to the Skills Set, other relevant qualifications should also be recognised under the scheme, to reflect the diverse workforce skills needs of the personal care services industry.

However, it is important to learn from other sectors where compulsory qualifications have not necessarily delivered the desired improvement to quality outcomes. Early childhood education and care is such a sector.

Therefore, equally important to individual registration is tighter audits and effective regulatory action on service providers, especially acting on those who are not delivering to quality standards and are driven by profit through access to government funding. This is an additional consideration in this registration discussion.

### **Registration for existing workers**

Following implementation of the scheme, there should be a transition period which considers the different circumstances of existing workers with experience, but without qualifications; existing workers with an approved minimum qualification; and existing workers who are currently enrolled in an approved minimum qualification.

Existing workers with eligible minimum qualifications should gain full registration under the scheme. Existing workers without qualifications but with significant relevant industry experience (e.g. greater than 12 months) should be supported to undertake Recognition of Prior Learning (RPL) for the nationally agreed Skills Set, with a reasonable timeframe allocated to complete this process and any gap training required. A transition period is recommended for existing workers with experience but without qualifications.

Existing workers who do not hold qualifications, who have limited workplace experience (e.g. less than 6 months), and who have not yet commenced an approved minimum qualification, should be supported to enrol in the nationally agreed Skills Set and apply for provisional registration under the scheme.

### **Ongoing Continuing Professional Development**

Nurses are required to complete at least 20 hours of relevant continuing professional development (CPD) annually to meet the ongoing registration requirements of the Nursing and Midwifery Board of Australia. The ongoing CPD requirements for personal care workers would be lower, given the relative complexity associated with the role.

A variety of CPD activities should be recognised including (for example):

- Formal education and training (e.g. workshops, seminars, conferences, online courses)
- Workplace-based learning (e.g. in-service training, mentoring)
- Self-directed learning (e.g. reading professional journals, completing online modules).

## Minimum English Language requirements

A level of English proficiency is required for safe and effective personal care practice. However, it is also necessary to ensure a multiculturally diverse workforce which is reflective of the community and service users. Skills Sets developed and delivered under Australia's national training system are required to be completed in English. TAFEs are well equipped to provide relevant English language and literacy support.

## Implementation support for workers

For successful transition and full implementation (with minimal disruption to the personal care workforce), the national registration scheme will require different kinds of supports and funding provided to new entrants and existing workers.

### Support for new workers

The cost of training can be prohibitive for new entrants to personal care work. Entry level training (e.g. the nationally agreed Skills Set) for personal care work should be available at no cost to all participants. Free training should also be extended to relevant Certificate III qualifications to increase participation and pathways 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. Additional wraparound support must be provided to ensure the success of all learners.

TAFEs provide support for equity students with well-established infrastructure and expertise, including specialised student services and learning support. These services are designed to address various needs and challenges that students may encounter, thereby enhancing their overall learning experience, increasing their likelihood of completing their qualification, and gaining employment. Support can include (for example):

- student counselling
- academic support
- career services
- financial assistance
- accommodation support
- disability support
- health and wellbeing services.

Many TAFEs also have learning areas and services dedicated to enabling Aboriginal and Torres Strait Islander students.

### Support for existing workers

Existing personal care workers should be supported to achieve the required Skills Set through free or minimal cost Recognition of Prior Learning (RPL) assessment with gap training where required. This should be funded as part of the national registration scheme's transition to implementation period.

## Conclusion and summary of recommendations

TDA is supportive of the proposal to introduce a national registration scheme for personal care workers. While the scheme represents an opportunity to improve transparency and public safety, it will also create an additional administrative and financial burden to service providers and workers which must be considered in its implementation. The recommendations made by TDA balance the need for an appropriately skilled and safe aged care workforce with the risks of creating further burdens to an industry experiencing increasing workforce shortages.

In summary, TDA recommends the following:

1. Provisional registration upon enrolment in a minimum nationally agreed Skills Set, with full registration applied upon completion of the Skills Set or a relevant Certificate III qualification.
2. No-cost or low-cost Recognition of Prior Learning (RPL) and gap training as required for existing workers without qualifications.
3. A mobile, portable digital application which can be easily maintained by individual workers.
4. Flexible CPD for workers with the minimum required set at a level appropriate to the role.
5. Tighter monitoring activity and effective regulatory action for service providers who are not delivering to quality standards, in addition to the national registration scheme.