

# The Aged Care Workforce Remote Accord Submission on the design of a national registration scheme to support personal care workers employed in aged care

The Aged Care Workforce Remote Accord makes this submission in response to the Department of Health and Aged Care design and training consultation paper. We seek to draw specific attention to potential challenges for workers and employers in remote Australia that must be accommodated in the new scheme.

## The Aged Care Workforce Remote Accord

The Aged Care Workforce Remote Accord (the Remote Accord) is a group of service providers and industry experts delivering aged care services in regional and remote areas of Australia.

The Remote Accord was formed based on the belief that every community—including those in remote and very remote areas of Australia—has an equal right to accessible, high quality aged care services. The Remote Accord saw its genesis in the *'A Matter of Care: Australia's Aged Care Workforce Strategy'* report; Strategic Action 11 recommended that the Government and industry support the establishment of a Remote Accord.

## Logistical and administrative barriers to increased regulation in remote areas

### **Workforce shortages and the barrier of additional registration requirements**

Workforce shortages in remote and very remote Australia are a well-documented and entrenched issue, particularly in the aged care sector. Service providers face ongoing challenges in attracting and recruiting a suitable workforce to meet the growing needs of remote communities. Creating additional registration processes risks further exacerbating this problem, particularly when these processes fail to account for the logistical challenges of recruitment and worker screening in remote Australia.

Service providers in remote Australia already struggle to overcome the logistical challenges of worker screening. Community members in remote areas often have limited access to the internet, services, and resources required to complete extensive background checks, making it burdensome for potential workers to meet the compliance requirements. Some community members may not

have identity documents. This burden has already grown as screening is standardised with NDIS processes:

“We face several logistical challenges in completing these checks:

Other employees or the Residential Manager must assist a majority of new locally-based employees with the online application due to the lack of computer skills. This also means that on some occasions an employee has not yet applied for an NDIS check before they begin on site due to the complexity of the remote location. We do ask employees at these sites to undertake a police check (via CrimCheck) but they still need assistance on site to do this.

In one remote location, a four-hour drive one way is required to visit a DOT or post office in order for an employee to have their identification documents sighted and recorded. The Residential Manager has resorted to driving out a group of employees and returning them (fully paid) to achieve the application.

Some locally based employees do not have drivers licences (or other forms of ID) that can also add complexity to the NDIS application process in the ability to drive there and in providing the required identification for an NDIS check.

In this location it costs a person \$145 to apply for a NDIS check, which we refund after an employee has applied. In remote areas we have been told that for care and domestic workers, they often need to be given \$145 so they can apply, rather than being reimbursed due to low socioeconomic status of some people within the local area.”

– from a Service Manager working at a remote service

The added complexities of personal care worker registration in remote areas may drive candidates to seek employment elsewhere, in roles where administrative processes are less intimidating, timelier, and more accommodating to the realities of remote life. As a result, aged care services in remote areas lose access to a workforce that is uniquely positioned to deliver culturally safe and trauma-aware care. We note the suggestion in the consultation paper that the registration process could be instantaneous, this will likely not be possible when using state-based identity verification processes. Instantaneous verification may also be hindered by literacy, connectivity and technology access issues in remote Australia.

For service providers, recruiting non-locals into personal care roles increases workforce costs, which creates a further inefficiency in the system. For remote communities, these local candidates often

represent the best possible option for delivering care that respects and understands the lived experiences of their Elders, and it is vital that any barriers to entry for these workers be minimised.

Furthermore, personal care work is a vital employment pathway into the aged care industry for workers with minimal formal qualifications. For remote communities it is often a pathway for people who do not want to leave the community to pursue further education but want to make a difference in the community they are a part of. It is vital not to create further career barriers for these community members.

**A national registration scheme must therefore be easy to access, accommodating of remote workers with limited literacy, computer skills and access to personal documents, affordable for individuals with minimal financial resources, and instantaneous. It must not represent a further barrier to entry for local remote workforces.**

### **The need for local discretion**

We note that the Royal Commission recommended the implementation of a standardised registration system for personal care workers in order to ensure a standard of care for all Australians accessing aged care. In remote areas, the needs and priorities of those accessing care differ from those in metropolitan areas, with a greater emphasis placed on cultural and community needs. It is therefore vital that the unique nature of remote communities be accommodated in any further registration processes, with local communities and employers being involved in and having discretion over registration of local workers.

By restricting employer discretion in worker registration and eligibility, a national registration scheme could inadvertently disincentivise the engagement of local, culturally appropriate workforces, deepening the workforce gap in an already stretched sector.

The need to avoid discouraging local workforces cannot be overstated. It is important to note that even the *perception* of an additional barrier to working in aged care can harm engagement of local workforces in remote communities. Word of mouth and employer-referrals are a vital part of the remote employment ecosystem; if the perception spreads that there is no room for discretion for individuals who know their background checks may raise concerns, potential employees are likely to self-select out of the aged care workforce entirely. Discretion sitting with the service provider allows for a trusting relationship to be developed within community, and improves provider/community relationships. Discretion sitting with an external entity risks further entrenching mistrust in the system. Removing discretion from within trusted community-based entities and moving discretionary decisions to an external Commonwealth entity risks further eroding trust in the system.

**A national registration scheme must therefore have scope to involve local employers on the ground in remote Australia, who know their communities best. Employers are well placed to assist locals with registration and make key decisions around worker suitability and training. This could be achieved by creating a carve out with increased discretion for MMM 6 & 7 communities.**

## Ongoing training for remote employees

### Access to training in remote Australia

Training for personal care workers in remote Australia presents a unique set of challenges that must be addressed if the workforce is to be supported effectively. In remote areas, there are very few opportunities to access training directly through local training providers. This scarcity of local resources will present a barrier in maintaining compliance with any national standards that the new registration scheme might mandate. The lack of proximity to training centres means that workers often have to travel long distances, which can be prohibitive in terms of both time and cost.

Additionally, online training options, while increasingly popular, are not always a practical solution for remote workers. Many remote areas experience inconsistent internet connectivity which can make accessing online training materials challenging. Even when online resources are available, they may not be specifically tailored to the realities of providing care in remote communities. Training content that is often not contextually relevant may fail to resonate with workers and can feel disconnected from their daily experiences of delivering aged care in isolated environments. Workers may struggle to see the value in training that doesn't directly address the challenges they face or the specific cultural needs of the communities they serve.

Moreover, literacy and numeracy barriers are common among remote workers, particularly in areas where educational opportunities are limited, and for many, English is often a second or third language. As such, training programs must not only be accessible but also flexible enough to accommodate these barriers. Employers in remote areas often play a key role in supporting their staff through the training process, providing additional assistance and guidance to ensure that workers can successfully complete their coursework. However, this requires time, resources, and a high level of support from employers, which may not always be available.

Compulsory ongoing professional development through a registration scheme risks feeling "tick-boxy" to local remote workers, especially if the content is generic or does not address the unique needs of the community. To ensure that training remains relevant and engaging for workers, it must include local content that speaks directly to the experiences and challenges of providing aged care in remote Australia. This could include modules on culturally safe care relevant to that community, trauma-informed practices, and community-specific healthcare challenges.

### Recognition of prior-learning and life experiences

Recognising the existing experience of community members already providing care in personal settings is another important consideration. Many individuals in remote areas have been delivering care informally or in non-registered roles for years, accumulating significant hands-on knowledge and expertise. For these workers, it is essential that the national registration scheme provides mechanisms to recognise prior learning and experience. Recognition of prior learning (RPL) processes should be streamlined and accessible, so that experienced workers do not feel excluded or undervalued due to a lack of formal qualifications. The Remote Accord is currently trialling a small program in Menindee, NSW, that aims to work with community, workers, and an RTO to explore new RPL pathways, but this work is in its infancy and would need further resourcing and exploration.

### A registration scheme should specifically recognise the remote Australian experience

It is worth considering the establishment of a “remote training exemption” for personal care workers in areas where access to training is particularly limited. This exemption would allow for tailored training programs to be developed for remote workers, acknowledging their unique needs and the challenges they face, but allow workers to opt out of generic training which is irrelevant or inaccessible in remote areas. Such programs would help bridge the gap between national standards and the specific realities of working in remote aged care, providing workers with the skills and knowledge they need to perform their jobs effectively while also recognising the constraints of their location. A delegated exemption would also help to track when gaps in training may be occurring for particular geographic areas, where specific training modules are not available.

**The design of the national registration scheme must consider the challenges faced by remote workers in accessing and completing training. It should be flexible, culturally appropriate, and supportive of the existing workforce, recognising the unique context of remote communities and ensuring that workers have access to training that is both meaningful and practical.**

### Cultural considerations in remote Australia

In remote Australia, the risk-reward calculation for hiring local workers is fundamentally different from the approach taken in urban settings. Employers in remote areas often face the dilemma of prioritising formal qualifications and clinical expertise versus hiring workers from the local community who may have less formal training but possess invaluable knowledge and cultural competency.

Hiring local workers, particularly from First Nations communities, can significantly reduce recruitment costs and improve the cultural safety of care provision. Local workers bring with them an intrinsic understanding of the community, its traditions, and its unique needs, which cannot be

replicated by external workers. This familiarity with the local culture and people enables them to deliver care that is not only respectful but also more aligned with the values and practices of the community. However, the trade-off often lies in the fact that these workers may not have the same level of clinical experience or formal qualifications as candidates from more urbanised areas.

The risk of hiring less qualified workers may appear greater from a clinical perspective, but the reward of providing culturally safe, trauma-informed care outweighs this concern in many remote communities. In these settings, the understanding of community dynamics, the ability to connect with clients on a personal level, and the knowledge of culturally appropriate care practices are essential to providing high-quality aged care. The equation in remote areas, therefore, shifts toward prioritising cultural safety and local knowledge over traditional qualifications or experience.

### **Prioritise training culturally safe workers to provide care rather than workers with a more robust clinical background to be culturally safe**

Given the unique needs of remote communities, it is essential to prioritise training culturally safe workers to provide care, rather than expecting workers with a more robust clinical background to be trained in cultural safety. Clinical expertise is undeniably important, but in remote areas, the ability to navigate the cultural and social complexities of local communities is far more crucial to providing effective care.

Culturally safe care involves understanding and respecting the customs, beliefs, and values of First Nations communities and ensuring that aged care services are delivered in a way that is non-judgmental and non-threatening. While it is important for all workers to have some level of cultural competency, in remote Australia the focus should be on recruiting and training individuals who are already embedded in the community, who speak the language, understand local traditions, and have established trust within the community. This approach not only ensures that care is culturally appropriate but also builds long-term relationships between workers and clients, which are essential for providing continuity of care.

“We work hard to employ local town camp community members as this is both empowering for the community members and beneficial for service users. The ultimate goal here is for Aboriginal people to be skilled and equipped to look after Aboriginal people. This does come with challenges, such as language barriers, literacy and numeracy issues, and the high likelihood of potential employees having previous brushes with the law. Currently, we have a strong and well-informed human resources team with strong ties to the local community who can make informed decisions about the appropriateness of different community members to work in aged care. Having this discretion removed would be incredibly detrimental for our organisation and its long-term goals.”

— from an ACCHO operating multiple services in remote Australia

### **English language minimum standards**

In remote areas, particularly those with a large First Nations population, many workers may speak English as a second or other language. In these cases, it is critical that employers are able to prioritise workers with strong cultural ties to the community, even if their proficiency in English may not be as high as that of other candidates. Workers from these communities often possess valuable cultural knowledge, and their ability to communicate with clients in a culturally appropriate manner is of paramount importance, even if there are occasional language barriers.

For workers who will primarily be interfacing with First Nations clients, it is crucial to ensure that language and cultural understanding are prioritised over strict English-language proficiency. This may involve providing additional language support or training in English, while focusing on the cultural competencies of the worker. By recognising the importance of these cultural and linguistic factors, aged care services can better support First Nations clients and ensure that the care provided is both effective and culturally safe.

The context of care therefore needs to be carefully considered before any English language minimum standards be implemented through a worker registration scheme; for many remote communities this is not a priority.