

9 October 2025

Department of the Treasury
Department of Finance

Via: CareSectorWorkerScreening@finance.gov.au

Re: National approach to worker screening in the care and support economy

Volunteering Australia is the national peak body for volunteering, working to support a thriving volunteering ecosystem in Australia by promoting and advocating for volunteering and providing leadership at a national level. The seven State and Territory volunteering peak bodies work to advance and promote volunteering in their respective jurisdictions and are foundation members of Volunteering Australia.

Given the short consultation period, we have not had capacity to prepare a full submission in response to the discussion paper [*National Competition Policy: National approach to worker screening in the care and support economy*](#). This submission reiterates key points made in our recent [submission](#) to the Productivity Commission in response to the *Delivering Quality Care More Efficiently: Interim Report*.

The rate at which demand for care and support services is growing and the labour-intensive nature of these services mean the care economy has a substantial impact on overall productivity. As part of the productivity agenda, we support the goal of removing unnecessary complexity and cost in worker screening processes in the care and support economy to improve worker mobility and efficiency for care workers, while protecting the rights and safety of care recipients, and enhancing the quality of care.

Overview

The discussion paper highlights the inconsistencies, gaps and fragmented nature of the current care economy worker screening process in Australia. However, volunteers are only briefly considered. At present, complex and time-consuming worker screening processes can present a barrier for people wanting to volunteer in the care and support economy, which relies heavily on volunteers to deliver quality services. The effectiveness and efficiency of worker screening should be improved while remaining a necessary part of ensuring the safety of care recipients.

A national approach to worker screening in the care and support economy has the potential to close gaps in current screening requirements that pose a risk to the safety of care recipients and vulnerable cohorts while also reducing barriers to volunteering. A national approach to worker screening would also be more widely applicable, including to volunteering in other areas that require worker screening, e.g., disaster response or community sport and the design process should factor this in.

We emphasise that to be effective, the development of any national worker screening process should:

- Consider volunteers as an essential, but distinct, component of the care and support workforce.
- Have the potential to be scalable and be rolled out more broadly than the care and support economy, even if in a phased approach, taking into account the needs of the community and volunteers across all sectors.
- Take a risk-proportionate approach to different categories of volunteer roles.
- Take into account existing work underway at both the state and federal level,¹ as well as investing the resources needed for a national approach.
- Involve extensive, meaningful, consultation with relevant volunteering stakeholders, the volunteering peak bodies, providers that involve volunteers and volunteers themselves. This must include sufficient time to consult with members and provide feedback as well as involvement in the design and testing of systems and processes.

Discussion

In our 2025 election platform, *Volunteer Nation: Positive Impact, Strong Communities*² we highlight that engagement of volunteers is often delayed or complicated by duplicative worker screening processes and training requirements, which are often not portable between jurisdictions. This can be a significant burden both for volunteers and volunteer involving organisations, particularly those that operate in more than one state or territory, or sector. We advocate for a National Volunteer Passport to improve portability of volunteer credentials between organisations and jurisdictions. This correlates with creating a verifiable credential that makes onboarding of volunteers easier for both volunteers and volunteer managers.

At present, each care sector addresses volunteers differently in terms of whether or how they are recognised as part of the workforce, which regulatory settings apply to them, and how clear these arrangements are for volunteers and providers. This creates gaps and inconsistencies with potential implications for care recipients as well as an inefficient regulatory burden for volunteers and providers. While we understand that this is reflective of the various legal and regulatory frameworks for each sub-sector, there is some consistency that can be achieved particularly at the threshold levels.

A national approach to worker screening in the care and support economy would support the mobility of volunteers between roles, organisations, sectors of the care and support economy and jurisdictions

¹ See any submissions from the State and Territory volunteering peak bodies for details of relevant work underway at a state level.

² <https://www.volunteeringaustralia.org/wp-content/uploads/Volunteering-Australia-Election-Platform-2025.pdf> 9-10

and could improve access to voluntary workers for care providers. It would reduce the administrative burden on volunteers and volunteer involving organisations and should be able to be scalable and rolled out more broadly than the care and support economy. It could also lead to increased trust in volunteer involving organisations and their volunteer workforce.

We have not had a reasonable timeframe to consider a particular model, however, we emphasise that the following factors need to be considered when designing and implementing any national worker screening approach for the care and support economy, and more broadly.

- Given their number and value to the community, volunteers must be recognised as an essential, but distinct part of the workforce and explicitly considered at every stage of designing and implementing these reforms.
 - Data collected as part of the Volunteering in Australia research in 2022 found that in April 2022, about a quarter (26.7 per cent) of Australians had done formal volunteer work in the previous 12 months. Of these, 8.8 per cent volunteered in aged care organisations and 4.7% volunteered in disability organisations, and at least 12.8 per cent volunteered in health services (hospitals etc), veterans services, mental health and other sub-sectors.³ This equates to hundreds of thousands of volunteers contributing to care services every year.
 - In the care sector, many providers engage volunteers. For example, according to the 2023 Aged Care Provider Workforce Survey Report, 46% of Residential Aged Care services and 48% of Commonwealth Home Support Program providers indicated they engaged volunteers.⁴ For such providers, having to navigate worker screening requirements for volunteers as well as paid workers, likely adds an additional layer of complexity to the existing administrative burden.
- Volunteers are different from paid workers in the care and support workforce in their role types, obligations and work expectations. This means they are not managed in the same way and may not respond in the same way to incentives or deterrents. Ideally regulatory settings will improve the safety of care recipients while ensuring that volunteers remain willing to freely give their time. This is important as there has been a general decline in volunteer numbers over time, yet an increase in the demand for many of the services that volunteers help to deliver.

³ <https://volunteeringstrategy.org.au/wp-content/uploads/2022/10/Volunteering-in-Australia-2022-The-Volunteer-Perspective.pdf>, 42. Volunteers were able to answer that they undertook volunteering in more than one category.

- Worker screening should be provided to volunteers free of charge.
- While application processes and identity verification should be streamlined to remove barriers to volunteering, while maintaining safety, alternative access methods do need to exist to provide full accessibility, particularly for those who are digitally excluded.
- We recommend a risk-proportionate approach to determining when and what sort of worker screening should apply to volunteers. This requires analysis of the distinct characteristics of volunteer engagement in each sector, balancing the benefits of volunteer involvement with the risks for different categories of roles. For example, it may be that in residential aged care most interactions are low risk due to the supervision present in such a regulated sector and the infrequency of most interactions and can contribute to quality care. However, in other scenarios, such as home visits for aged care support or community settings with children, the risks could be higher. A single type of screening may not suit this variety of roles and risk levels. Guidance is needed to support a risk-proportionate approach, otherwise organisations may default to unnecessarily requiring volunteers to hold the highest level of clearance available, even when this is not required. The new federal aged care legislation and associated regulatory settings provides an example of a risk-based approach, although it has yet to be tested in practice.
- We acknowledge the logic of considering how worker screening interacts with worker registration (as proposed in the discussion paper at pages 16 and 25). However, more consideration needs to be given to if or when worker registration should apply to volunteers. We cannot provide any detailed recommendations regarding the impacts and implications of requiring volunteers to be registered until a model is proposed, should one be proposed.
- It is crucial that the different volunteer involving sectors – and parts of government – involved in this work communicate with each other and consider the impact on volunteers in a consistent way, taking a risk-proportionate approach to determining which volunteer roles require what level of worker screening and how. Inconsistent approaches increase complexity and risk for volunteers, providers and care recipients.

In relation to the detailed proposals put forward in the discussion paper around principles, design elements and models, neither Volunteering Australia nor the State and Territory volunteering peak bodies have had time to consult the volunteering sector. That said, Volunteering Australia supports the principles set out on pages 19-22 of the discussion paper, with some comments to follow:

- Safety of vulnerable cohorts is paramount.
- Regulation should enhance safety at the lowest possible cost (i.e. regulation must be targeted, risk-based and proportionate).
- Checks should be portable across sectors and jurisdictions.
- Worker screening should be continuous and near real-time, where appropriate.

- Information about worker screening applicants and check holders should be expanded and shared across jurisdictions.
- Existing systems should be integrated and uplifted where possible, noting this should be subject to appropriate investment and needs to avoid unintended consequences.
- Reform efforts will need to be aligned.
- Cultural safety should be embedded.

Regarding the more detailed design features, our main concern is that volunteers and their differing needs be considered alongside paid workers. We support:

- A single 'front door' through myGov, with alternative entry points properly resourced to ensure accessibility, including for the digitally excluded.
 - Additionally, organisations should have access to check on application status and assist their volunteers apply for worker screening.
- Creating a verifiable credential. This would benefit all workers, including volunteers, as well as volunteer involving organisations.
- A solution that reduces the wait time for 'simple' applications. Long delays are currently a barrier in onboarding volunteers.

We welcome the opportunity to engage further with this process to ensure that any national worker screening process is suitable for volunteers and volunteer involving organisations and balances the safety of care recipients against any unintended consequences for the volunteers who support them.

Authorisation

This submission has been authorised by the Chief Executive Officer of Volunteering Australia.



Mr Mark Pearce
Chief Executive Officer

Endorsements

This position statement has been endorsed by the seven state and territory Volunteering Peak Bodies.



About Volunteering Australia

Volunteering Australia is the national peak body for volunteering, working to advance volunteering in the Australian community. Volunteering Australia's mission is to support a thriving volunteering ecosystem in Australia by promoting and advocating for volunteering and providing leadership at a national level.

The seven state and territory Volunteering Peak Bodies work to advance and promote volunteering in their respective jurisdictions and are Foundation Members of Volunteering Australia.

Our vision is for a future where volunteering is the heart of Australian communities. This vision was co-designed with thousands of people from across Australia during the development of the National Strategy for Volunteering.

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