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Dear Secretariat,

Thank you for the opportunity to appear before the Joint Standing Committee. We have reviewed the proof Hansard of our appearance and can confirm there are no transcription errors.

To supplement our evidence and provide further context on key reform issues discussed, we wish to share two recent submissions made by National Disability Services (NDS):

1. Submission on the NDIS Supports Rule (Section 10) Consultation

This submission was provided to the Department of Social Services as part of the consultation on the NDIS Supports Rule. It outlines recommendations for improving clarity, flexibility, and fairness in the support lists, with a focus on ensuring the rules enable access to appropriate and cost-effective supports. The submission draws on direct feedback from members and highlights the need for a more person-centred, functional approach to support provision.

2. Submission on the National Aged Care Worker Registration Scheme Consultation

This submission was made to the Department of Health and Aged Care regarding the proposed national registration scheme for personal care workers in aged care. It addresses the implications for the disability support workforce, emphasising the need for a proportionate, practical approach that considers sector overlap and workforce supply issues. The submission also calls for harmonisation to be risk-based and co-designed with the disability sector.

Both documents are directly relevant to the Committee's inquiry and supplement the evidence provided at our appearance. They demonstrate the interconnectedness of current reforms across aged care and disability, and highlight sector priorities for workforce, regulatory, and support system changes. We believe these submissions will assist the Committee in understanding the broader policy context and the practical implications of proposed reforms for people with disability, providers, and the workforce.

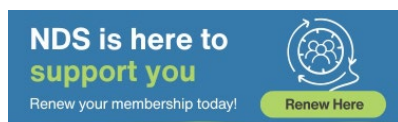
Please let us know if you require further information.

Regards

[Redacted signature block]



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NDS acknowledges the Australian Aboriginal and Torres Strait Islanders peoples as the first inhabitants of the nation and the Traditional Custodians of the lands where we live, learn and work.

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National Disability Services Submission:

NDIS Supports rules consultation

About National Disability Services

National Disability Services (NDS™) is Australia's peak body for disability service organisations, and Australia's biggest and most diverse network of disability service providers. Our valued members collectively operate several thousand services for more than 300,000 Australians with disability and employ a workforce of more than 100,000 people.

NDS is committed to a sustainable and diverse disability service sector, underpinned by the provision of high-quality, evidence-based practices and supports that strengthen, safeguard, and provide greater choice for people with disability in Australia.

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Executive summary

National Disability Services (NDS) is Australia's peak body for non-government disability service providers. We represent members delivering NDIS-funded supports to thousands of participants across urban, regional, and remote communities. Our submission draws on extensive member consultation, intermediary feedback, and real-world case examples. It reflects the daily experience of providers working with participants to implement NDIS plans and navigate the practical impacts of Section 10.

While we support the objective of greater clarity about what the NDIS will and will not fund, the current application of Section 10 is creating unintended and at times harmful consequences. Participants are being denied essential supports due to overly rigid interpretations, and providers are being exposed to compliance risks without clear authority or guidance. This is particularly pronounced in regional and remote areas, where market constraints further limit choice.

Our recommendations are based on evidence from frontline providers and offer practical, actionable solutions to ensure that Section 10 supports participant outcomes, safeguards provider roles, and promotes a fair, consistent and sustainable NDIS.

Summary of recommendations

More detail on each of these recommendations is provided in the body of this submission.

- Recommendation 1: Redesign the NDIS support lists to prioritise function and participant outcomes.
- Recommendation 2: Allow low-cost everyday items that meet a disability-related function to be funded without requiring complex approvals.
- Recommendation 3: Reform the replacement supports process to ensure timely, transparent, and cost-efficient access to functional supports.
- Recommendation 4: Clarify and support intermediary roles through formal recognition, decision-making protection, and consistent guidance.
- Recommendation 5: Adapt eligibility and operational rules to reflect limited provider access and travel requirements in thin markets.

- Recommendation 6: Ensure consistency across NDIS policy instruments, pricing, guidance, and on-the-ground decision-making.

NDS brings the collective voice of the provider sector, with unmatched insight into the operational and systemic impacts of policy implementation. We urge the Department to co-design improvements to Section 10 in partnership with providers, participants, and communities, ensuring the Scheme remains fair, functional, and focused on outcomes.

Overview

National Disability Services (NDS) welcomes the opportunity to make a submission in response to the consultation on the NDIS Supports Rule (Section 10). NDS supports reform that improves clarity, fairness, and access in the NDIS, and ensures participants can confidently use their plans to pursue their goals and exercise choice and control.

This submission responds to the Department's request for feedback on the transitional rules introduced in October 2024 and their practical impacts, particularly the application of the NDIS support lists and the process for replacement supports. It addresses the rule's role in defining what can and cannot be funded under the NDIS, and how this is working in practice for participants, families, intermediaries, and frontline services.

Scope of submission

This submission draws on input from NDS members across a wide range of settings and service types, including organisations delivering support coordination, plan management, allied health, community access, assistive technology, housing, and therapy services. Our members work with thousands of NDIS participants in metropolitan, regional, rural, and remote communities, including those with complex support needs, culturally and linguistically diverse backgrounds, and Aboriginal and Torres Strait Islander peoples.

The evidence base informing this submission includes:

- A national survey of NDS members regarding the implementation of the Supports Rule and lists.
- Direct feedback from a targeted consultation session with intermediary providers.
- Case examples from providers navigating the replacement supports process, item rejections, and plan underutilisation.
- Ongoing sector engagement regarding pricing, planning, funding periods, and broader scheme reform.

The submission addresses the following key areas:

- Clarity and usability of the support lists.

- Effectiveness and accessibility of the replacement supports process.
- Misinterpretations of “mainstream” versus “disability-specific” items.
- The shifting of risk and decision-making responsibilities to intermediaries without adequate support.
- Systemic inflexibility in meeting participant needs in regional and remote areas.
- Opportunities to ensure alignment, consistency, and fairness in how the rule is operationalised.

The recommendations in this submission aim to improve the functionality, fairness, and clarity of the NDIS Supports Rule, ensuring the system can meet the diverse and dynamic needs of participants and the services that support them.

Themes and recommendations

This submission is grounded in extensive consultation with NDS members—organisations delivering frontline supports to NDIS participants across a range of settings. Their experiences point to significant problems with the way the NDIS Supports Rule (Section 10) is currently designed and applied.

Independent research supports these concerns. The Grattan Institute’s 2025 *Saving the NDIS* [report](#) reinforces many of the issues raised by providers, including:

- The negative effects of binary support classifications on participant access and planner flexibility.
- Compliance pressures on intermediaries leading to reduced plan utilisation.
- Misalignment between planning decisions and operational guidance.
- The need for transparent decision registers and faster, fairer access to low-cost functional supports.

The five themes and recommendations that follow reflect the practical and operational challenges we are hearing about with the current implementation of Section 10—and make recommendations to improve clarity, flexibility, and fairness across the Scheme.

Confusion, inflexibility, and the misapplication of support lists and everyday items

Issue

The current NDIS support lists, while intended to provide clarity, are being applied as rigid exclusionary tools. Supports such as weighted blankets, blenders for swallowing conditions, or iPads with communication apps are routinely denied because they are not considered “disability specific.” Similarly, everyday items with a legitimate disability-related function—such as noise-cancelling headphones for sensory regulation or orthotic shoes for participants using ankle-foot orthoses—are excluded simply because they are mainstream products.

The interpretation of the in/out lists by planners and NDIA delegates is overly rigid and fails to account for functional use, individual context, or clinical justification. This undermines core NDIS principles of choice and control, limits access to inclusive, cost-effective supports, and leads to inconsistent decision-making across the scheme.

In regional areas, where service access is limited, these issues are intensified. A Deafblind participant in Broken Hill was denied funding for an iPad with visual interpreting apps because it was a mainstream product—even though no interpreters were available locally. In another case, a participant was denied orthotic shoes due to the supplier not being disability-specific, despite no such store existing in their town.

The NDIS support lists include community transport services on the list of non-NDIS supports. On face value this means that participants are unable to use NDIS payments to access transport services from a community transport provider even where this may be the most cost effective transport option or, in the case of some locations where there are no accessible taxis and ride share services, the only option. While community transport is contracted through state and territory governments, contracts and guidelines across most states and territories (for example: [Transport for NSW Community Transport Organisation](#)

[Service Contract Schedule 4](#)) note that people receiving NDIS funding are ineligible to access state funded community transport services.

Impact

Participants are being denied low-cost, practical supports that promote independence, safety, and inclusion. Plan managers and support coordinators are left navigating grey areas without clear authority or escalation pathways, increasing compliance risks and administrative burden. Participants often face out-of-pocket costs or go without the support they need—leading to increased reliance on more expensive formal supports.

Recommendation 1: Redesign the NDIS support lists to prioritise function and participant outcomes.

What Needs to Happen

- Consolidate lists into a single, conditional framework with context flags.
- Embed a functional outcomes-based approach in funding rules and guidelines.
- Publish consistent case examples and decision-making tools.

How?

- Replace binary 'in/out' classifications with a three-tiered system: 'funded,' 'context-dependent,' or 'requires justification.'
- Amend Section 10 wording and operational documents to prioritise how a support addresses a participant's functional needs—even if commonly available.
- Create a national searchable database of approved/declined supports with decision rationale to support consistent, transparent practice.

Recommendation 2: Allow low-cost everyday items that meet a disability-related function to be funded without requiring complex approvals.

What Needs to Happen

- Establish a flexible annual cap (e.g. \$1,500) for everyday functional supports.
- Clarify eligibility based on functional purpose in operational guidance.
- Include real-world scenarios to illustrate support use in participant contexts.

How?

- Permit plan managers to authorise purchases under a defined cap without requiring NDIA pre-approval, where the item clearly meets functional goals.
- Add functional justification criteria to guidance and planner training to support items like kitchen aids, orthotic footwear, or assistive apps.
- Publish case-based examples showing why supports were funded and what outcomes they enabled, to drive consistency and reduce appeals.

Replacement supports process is inaccessible and ineffective.

Issue

The replacement supports process was introduced to enable flexibility by allowing participants to substitute lower-cost or more appropriate supports not generally considered an NDIS support, but in practice it is opaque, under-promoted and burdensome. Few providers or participants understand when or how to use it. There is no central point of access, no published timeframes for decision-making, and no clear avenue for internal review if a request is denied. The NDIA's current handling of these requests lacks transparency and discourages use of a potentially cost-saving tool.

Impact

Participants miss fit-for-purpose alternatives, such as assistive technology apps or household tools. Providers report that the cost of applying often exceeds the value of the item. In one case, obtaining and preparing documentation to support a \$250 app for a blind participant was estimated to cost over \$400. This results in inefficiencies, participant frustration, and reduced plan utilisation.

Recommendation 3: Reform the replacement supports process to ensure timely, transparent, and cost-efficient access to functional supports.

What Needs to Happen

- Introduce a fast-track approval pathway for supports under \$1,500.
- Provide a central application portal with tracking features.
- Introduce review rights and decision time benchmarks.

How?

- Allow streamlined approvals with reduced documentation for low-risk, low-cost items that meet a defined functional need.
- Integrate a replacement support request form into myNDIS portals with ability for intermediaries to lodge and track submissions.
- Implement internal review options and publish service standards (e.g. decisions within ten business days) to build system accountability.

Intermediary role clarity and risk transfer

Issue

Support coordinators and plan managers are required to make daily decisions about NDIS funding claims without clear authority or system protections. They are asked to interpret policy in grey areas, including whether a support is reasonable and necessary, but have no assurance they will be supported if their judgement is later challenged. This creates a compliance minefield. Intermediaries are expected to implement funding rules while not being recognised as decision-makers within the scheme.

Impact

Providers are exposed to compliance and repayment risk, legal uncertainty, and reputational harm. Participants receive inconsistent advice, and service delivery slows due to internal risk protocols. Plan managers have increasingly found themselves in a position of acting as de facto decision-makers for what constitutes "reasonable and necessary" supports—responsibilities traditionally held by the NDIA. This shift has placed a considerable burden on these intermediaries, who are expected to navigate the complexities of new policies without additional funding, training, or resources. The absence of sufficient guidance has not only increased workloads but also exposes providers to compliance, operational and reputational risks. The NDIA's reliance on intermediaries to bridge gaps in communication and implementation has exacerbated stress within an already strained sector. The support coordination market, for example, is under immense pressure, with many providers exiting the market, creating service gaps in numerous regions.

Example:

One plan manager received invoices totalling **\$200,000** for Short Term Accommodation (STA) and related supports that had already been delivered. The value and structure of the supports exceeded standard expectations, and there was no written authorisation from the NDIA confirming the arrangement as reasonable and necessary. The provider was expecting payment, and the participant's funding was exhausted—leaving the plan manager with a high-risk, high-value decision and no formal authority to resolve it.

In an attempt to clarify the situation, the plan manager contacted the NDIA via the appropriate channels and requested written confirmation of the funding decision. The response from the agency was:

"We've reviewed your inquiry and can advise that the decision regarding reasonable and necessary supports is made by the National Disability Insurance Scheme when a participant's plan is approved. Providers and plan managers should discuss the approved supports with participants. In conjunction with this, with their plan, providers can refer to

the pricing arrangements and price limits on our website. If circumstances change, the agency may conduct a plan reassessment. This inquiry is closed."

No escalation option, formal advice, or assurance was provided. The inquiry was closed without addressing the substance of the risk or the potential liability to the intermediary.

The plan manager described being placed in an impossible position: required to decide whether to process a payment of substantial value without confirmation that it was compliant with the participant's plan. As a not-for-profit organisation, they could not afford to take on the financial risk of repayment if later found in breach, nor could they provide clarity to the provider or participant. They emphasised that there was no channel through which to escalate or obtain a written answer—only a default to silence or refusal.

This example highlights how the current in and out lists under Section 10 fail to account for complex, high value supports like STA, where context and participant need often fall outside standard definitions. The absence of a mechanism for intermediaries to seek binding clarification or escalate ambiguous cases forces plan managers into roles they are neither resourced nor authorised to perform. While the lists aim to improve clarity, in practice they can leave intermediaries navigating grey areas with no formal guidance—particularly when supports do not neatly fit within the prescribed categories. To avoid further confusion and risk, the Supports Rule must be amended to ensure the lists are applied with flexibility, supported by clear escalation pathways and written decision support for plan managers and coordinators dealing with exceptional or uncertain cases.

Recommendation 4: Clarify and support intermediary roles through formal recognition, decision-making protection, and consistent guidance.

What Needs to Happen

- Provide a dedicated advice line for intermediaries seeking binding clarification.
- Offer structured training and updated compliance guidance.
- Guarantee protection for good-faith decisions made in line with NDIA advice.

How?

- Establish a support desk for intermediaries with service standards for providing authoritative guidance on complex decisions.
- Develop a national training package for support coordinators and plan managers, including case studies and compliance case law.
- Embed indemnity provisions within policy or guidelines for intermediaries acting in accordance with official NDIA guidance and procedures.

Inflexibility for regional and remote participants

Issue

NDIS policy assumes that participants can access a wide range of providers and that supports are readily available locally. This does not reflect the reality in many regional, rural, and remote communities. Supports such as STA, community participation, or 2:1 ratios are often unavailable within the participant's region. Rigid application of rules around 'usual environment' and travel restrictions block access to necessary supports. In border communities, cross-jurisdictional bookings are sometimes rejected because they appear to be 'holidays' or 'non-typical settings'.

Impact

Participants are denied supports not because the need is ineligible, but because the rules are not responsive to geographic realities. Providers report being unable to claim STA delivered interstate, despite the participant having no other viable option. This reduces respite access, isolates participants, and exacerbates service inequity across regions.

Recommendation 5: Adapt eligibility and operational rules to reflect limited provider access and travel requirements in thin markets.

What Needs to Happen

- Permit out-of-area and cross-border claims where services are unavailable locally.
- Authorise flexible ratios and formats where required by market conditions.
- Integrate location-based flexibility triggers in planner workflows.

How?

- Amend operational guidance to permit STA or therapy access across state lines where local options are not viable.
- Allow planners to approve supports delivered under alternate configurations (e.g. 1:1 ratio in lieu of unavailable 1:3), based on regional evidence.
- Include location data flags within planning systems that trigger prompts for planner discretion when thin market conditions apply.

System misalignment and operational inconsistency

Issue

There is persistent misalignment between what is outlined in the NDIS Support Rules, the Pricing Arrangements, operational guidelines, and actual planner decisions. Providers report being told by planners that items are 'health-related' when other NDIA teams have previously approved the same support for other participants. Speech therapy for swallowing and diagnostic assessments for access are key examples where unclear boundaries and planner discretion result in frequent denials.

Impact

Participants face inconsistent outcomes depending on the planner or region. Providers must spend significant time contesting decisions, contributing to plan underutilisation and increased reviews. Confidence in NDIA decision-making is eroded, and providers face reputational damage when guidance changes between planning meetings and implementation.

Recommendation 6: Ensure consistency across NDIS policy instruments, pricing, guidance, and on-the-ground decision-making.

What Needs to Happen

- Conduct a comprehensive alignment review across all relevant instruments.
- Develop a shared decision register accessible to all stakeholders.
- Support a regular co-design mechanism for system and guidance updates.

How?

- Undertake a full review of rules, pricing arrangements, and guidance content to eliminate contradictions and align interpretations.
- Create a publicly available support decision register including common rulings, rationale, and applicable context for planners and providers.
- Fund a standing working group of NDIA planners, DPOs, providers, and participant representatives to review emerging issues and update resources quarterly.

Conclusion

The implementation of the NDIS Supports Rule (Section 10) must reflect the diversity, complexity, and realities of delivering supports to people with disability across Australia. While the aim of improving clarity and consistency is commendable, the current approach has created unintended consequences—narrowing participant access, increasing administrative burden, and shifting decision-making risks onto providers and intermediaries.

This submission highlights six key areas where reform is urgently needed. Across each, the message from NDS members is clear: the system must be more flexible, more transparent, and more aligned with the functional needs and goals of participants. Rules and guidelines must support—not obstruct—good practice and informed decision-making.

The recommendations put forward are practical, grounded in real-world experience, and focused on restoring confidence, fairness, and equity in how the NDIS determines what it will fund. They call for a shift away from rigid lists and risk-averse interpretations toward a system that recognises function, context, and the value of local decision-making.

NDS welcomes continued engagement with the Department and the NDIA on the reform of Section 10. We remain committed to working in partnership to co-design a system that empowers participants, supports providers, and ensures the long-term sustainability of the Scheme.

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Friday, 25 July 2025



National Disability Services Submission:
Towards a Harmonised and Sustainable
Workforce:
National Registration Scheme for Aged Care
Personal Care Workers

About National Disability Services

National Disability Services (NDS™) is Australia's peak body for disability service organisations, and Australia's biggest and most diverse network of disability service providers. Our valued members collectively operate several thousand services for more than 300,000 Australians with disability and employ a workforce of more than 100,000 people.

NDS is committed to a sustainable and diverse disability service sector, underpinned by the provision of high-quality, evidence-based practices and supports that strengthen, safeguard and provide greater choice for people with disability in Australia.

Introduction

National Disability Services (NDS) welcomes the opportunity to contribute to the Department of Health and Aged Care's consultation on the design and implementation of a national registration scheme for personal care workers (PCWs) in aged care. This proposed reform has significant implications not only for the aged care sector but for the broader care and support economy, including the disability sector.

NDS supports reforms that enhance the quality, safety, and professional standing of support workers. However, the success of any registration scheme will rest on its design being proportional to risk, carefully harmonised across sectors, and responsive to the unique attributes of the disability workforce. Implementation must be collaborative, staged and evidence driven. A well-designed scheme has the potential to strengthen workforce capability, mobility and improve the quality of support received by end service users. A poorly implemented scheme, however, could exacerbate existing workforce shortages and impose undue regulatory burdens on workers and providers.

This submission draws on NDS's knowledge of the disability workforce and operational context and offers key implementation actions to ensure any reform contributes to a safer, more professional, and sustainable support workforce across all sectors.

The need for alignment across the care and support economy

The aged care and disability sectors share an overlapping workforce, with workers frequently moving between roles, settings, and funding systems. In many instances, personal care and disability support workers hold the same qualifications—most commonly, a Certificate III in Individual Support—and undertake many functionally similar tasks. Yet, they are currently subject to different regulatory regimes, workforce strategies, and employment conditions.

Introducing a standalone registration scheme for aged care workers, without a parallel or integrated approach for the disability sector, risks further regulatory fragmentation. This would undermine workforce mobility, increase red tape for providers operating across sectors, and confuse workers navigating between roles.

Harmonisation should extend to worker screening processes to avoid unnecessary duplication and cost. Registration and screening should be integrated within a single, streamlined process, with a common platform and fee structure across the care and support sectors. This would also enable greater cross-sector protections, such as ensuring that banning orders apply consistently and prevent individuals from shifting between related care industries.

The Australian Government should prioritise harmonisation of workforce registration frameworks across the care and support economy by establishing a shared regulatory infrastructure, common baseline standards, and mutual recognition of qualifications, registration status, and codes of conduct. Such harmonisation would be consistent with the objectives of the Care and Support Economy Reform Unit within the Department of the Prime Minister and Cabinet, as well as the Department of Finance's stewardship approach to managing Australian Government regulatory systems. Where sector-specific adaptations are required—such as different practice standards or training content—these should be clearly delineated but administratively linked to a unified registration process.

Implications for the disability sector

NDS supports the establishment of a national disability support worker registration scheme, as recommended by the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (DRC) and the Independent Review of the NDIS (NDIS Review). However, this support is contingent on several critical implementation conditions.

- The design must be proportionate to the level of risk posed by different roles, avoiding duplication with existing worker screening mechanisms.
- It must ensure that registration does not become a barrier to workforce entry, particularly in rural and remote communities and for marginalised groups, including First Nations workers, people with disability, or culturally and linguistically diverse workers.
- Disability funding and pricing models must support effective implementation. Disability providers are facing critical viability issues impacting their capacity to invest in professional development for their staff, despite recognising the

importance of this. The cost of training disability support workers is not adequately recognised in the Disability Support Worker Cost Model. Adjustments to the model and considering directly funding providers for any training obligations in a worker registration model will be required.

- Any worker registration scheme must be consistently applied across the sector. Unlike the aged care sector, not all providers are required to be registered, and not all workers require worker screening. This has created a situation where supports acknowledged as high risk can be provided by unregulated providers and workers. The NDIS Provider and Worker Registration Taskforce identified that further work was needed to define a disability support worker given that a significant number of sole traders providing disability supports.

To support these objectives, the design and operation of an aged care registration scheme should align with the recommendations from the DRC, the NDIS Review and NDIS Provider and Worker Registration Taskforce. This includes integrating worker registration with skills recognition systems—such as the proposed National Skills Passport—and recognising alternative pathways to qualification, including meaningful recognition of prior learning, lived experience and the value of a peer workforce, and employer-validated competencies.

It should also be implemented in a way that strengthens, rather than undermines, workforce supply—recognising the acute shortages and high turnover rates that continue to challenge both the aged care and disability sectors.

Tailored support mechanisms should be established to ensure workers facing digital exclusion, language barriers, or financial hardship are not left behind. This includes investment in system navigation assistance, accessible registration processes, and wraparound supports that address the diverse needs of the disability workforce.

The registration scheme should be recognised as both a mechanism for quality assurance and a tool to strengthen workforce capability. As part of this, workers should not only be required to meet registration standards, including training obligations and continuing professional development (CPD), but also be supported to access these through government-funded training entitlements. This should include CPD hours as part of a broader career development framework. To promote retention and progression, these entitlements should be aligned with stackable qualifications and clearly defined, fee-free pathways to Certificate III and IV level training. Funding would

need to be allocated outside of individual support plans to avoid cost burdens falling on participants/consumers or providers and should be part of a dedicated workforce development investment to ensure sustainability and equity of access.

Training, qualifications, and workforce capability

NDS supports minimum training requirements for entry into the workforce, noting the shift in provider attitudes toward greater workforce professionalisation. However, it is essential that any mandated qualifications reflect the actual competencies required for safe, person-centred support. Skills like effective communication, reflective practice, and cultural competency are crucial in ensuring human rights approach. As outlined in the NDS Skills Project and consistent with feedback from disability providers and Registered Training Organisations (RTOs), while the Certificate III in Individual Support has undergone recent updates to embed person-centred and trauma-informed approaches, concerns remain around its implementation quality and alignment with disability-specific practice. Ongoing issues with poor training delivery and limited placement availability continue to undermine its effectiveness as a workforce foundation.

Training delivery must be flexible, accessible, and responsive to workforce needs. This includes ensuring that short-form, modular training is available to support ongoing professional development, and that accredited learning is supported by reliable, high-quality workplace placements and earn-and-learn models. Current difficulties in sourcing placements are a major barrier to course completions and must be addressed through coordinated policy action between government, providers, and RTOs.

The registration scheme should support CPD in a way that is administratively efficient and relevant to the needs of the workforce. While NDS supports a minimum CPD threshold, restrictions on certain training types—such as excluding first aid or limiting refresher training—risk deterring participation and reducing flexibility. Workers should be able to undertake CPD aligned with their roles, settings, and career goals, and this should include supports such as vocational English and numeracy, attitudes, communication, and updates on sector reforms.

To ensure a qualified and capable workforce, the Government must work with the relevant Jobs and Skills Council (HumanAbility) to revise the Certificate III in Individual

Support, increase support for short-course and CPD options, and address structural barriers to student placements, traineeships, and training completion.

Design principles for an effective registration scheme

To be effective, a worker registration scheme must be clear, accessible, and appropriately governed. It must support transparency and accountability while remaining simple for workers, employers, and NDIS participants to navigate. NDS supports a model where registration is held and managed by the individual worker not the provider. A public register that displays worker status, qualifications and CPD history will support participant trust, enable informed decision making and professional recognition.

Such a model enables public confidence and provides employers with a reliable mechanism for verifying worker credentials and general suitability.

For the scheme to be applicable to the disability sector, consideration should be given to:

- Establishing protected role titles, such as "Registered Disability Support Worker," tied to minimum training standards.
- Providing provisional or conditional registration categories. These could include workers who are new to the sector and undertaking mandatory training, students on placement, and workers transitioning from other sectors. Provisional registration would allow for structured entry into the workforce, supporting recruitment pipelines while maintaining safeguards and visibility.
- Avoiding overreach in scope. Workers in the disability sector perform a broad range of roles. In designing the scheme, it is essential that registration captures roles where there is a meaningful risk to safety and quality. Over-regulation of lower-risk roles risks driving people out of the workforce or creating unnecessary bottlenecks in entry pathways. Thorough consultation with providers, peak bodies, workers, and NDIS participants will help define the scope of registration appropriately and ensure clarity about what registration entails.
- Drawing on the experience of the Victorian Disability Worker Commission—currently the only regulator overseeing a disability worker registration scheme—

to inform national design. This includes learning from its strengths in transparency, inclusive standards (such as the acceptance of vocational English and AUSLAN), and CPD flexibility.

- Ensuring that any national scheme scales appropriately and reduces duplication, especially in relation to overlapping provider and worker registration and screening processes.
- Ensuring registering with the scheme is free for workers. If a registration fee is applied, it should be consistent across all sectors and include subsidised options for low-income or disadvantaged workers. The process must remain simple, with workers responsible for maintaining their information and providers able to verify registration status in real time.

A roadmap for action

To realise the full potential of workforce registration to enhance quality, safety and help professionalise the care and support workforce, NDS recommends that the Australian Government:

- Establish a harmonised national registration framework across the care and support economy, ensuring alignment of registration standards, infrastructure and mutual recognition across aged care, disability support and veterans' care.
- Ensure that funding and pricing supports providers to implement worker registration and that existing disability provider responsibilities for supervision and training align with any responsibilities under a worker registration scheme.
- Co-design the registration scheme with sector stakeholders, including people with lived experience, to ensure its structure, governance and implementation reflect the needs of service users, workers, and providers.
- Implement provisional registration pathways to enable new entrants, students, and transitioning workers to enter the workforce while undertaking required training.
- Revise the Certificate III in Individual Support and associated training packages to align with the real-world needs of the disability and aged care sectors, ensuring flexibility and quality in course design and delivery.

- Integrate registration with emerging skills recognition systems, including the National Skills Passport, to support career development, credential portability and workforce mobility.
- Provide targeted supports for underrepresented and disadvantaged workers, including digital and language support, subsidised training access, and system navigation assistance.
- Phase implementation carefully, allowing sufficient time for workforce adjustment, and ensuring existing workers are not excluded through overly rigid transition arrangements.
- Develop a worker registration and accreditation scheme that includes recognition of prior learning and lived experience, fee-free training to Certificate III/IV levels, protected professional titles, and annual CPD entitlements.
- Ensure registration systems are accessible to disadvantaged communities, including support for applicants with disability, low digital literacy, or limited documentation. The process should permit communication support contacts and flexible ID requirements and enable early engagement of overseas-based workers with a pathway to local employment.

Conclusion

The introduction of a registration scheme for personal care workers presents a significant opportunity to strengthen the safety, professionalism, and sustainability of the support workforce. However, success depends on designing a system that is harmonised, proportionate, inclusive and implemented in genuine partnership with those it will affect. The different operating environments, and crucially funding models and arrangements that apply across the aged care, disability and Veteran's care sectors must also be considered.

NDS looks forward to continued engagement with government and stakeholders to ensure that reforms to worker registration in aged care contribute to a broader, cohesive strategy for workforce development across the care and support economy. The voices of people with disability, workers and service providers must remain central to this reform journey.

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References

Department of Health and Aged Care, 2025. *Aged care national worker registration scheme consultation paper*. [online] Available at:

<https://consultations.health.gov.au/market-workforce-division/aged-care-national-worker-registration-scheme> [Accessed 26 Mar. 2025].

Department of the Prime Minister and Cabinet (PM&C), 2023. *Care and support economy*. [online] Available at: <https://www.pmc.gov.au/policy-topics/care-and-support-economy> [Accessed 26 Mar. 2025].

Department of the Prime Minister and Cabinet (PM&C), 2022. *Regulatory stewardship / Regulatory reform*. [online] Available at:

<https://www.pmc.gov.au/publications/regulatory-stewardship> [Accessed 26 Mar. 2025].

HumanAbility, 2024. *Workforce Plan 2024*. [online] Available at:

<https://humanability.org.au/resources/workforce-plan-2024> [Accessed 26 Mar. 2025].

National Disability Services (NDS), 2023. *NDS submission: Disability Royal Commission - Government Response*. [online] Available at:

<https://www.nds.org.au/policies/nds-submission-drc-government-response> [Accessed 26 Mar. 2025].

National Disability Services (NDS), 2024. *NDS submission: NDIS Provider and Worker Registration Taskforce*. [online] Available at: <https://www.nds.org.au/policies/nds-submission-ndis-provider-worker-registration-taskforce> [Accessed 26 Mar. 2025].

National Disability Services (NDS), 2024. *NDS Skills Project 2024 – Final Report*.

[online] Available at: <https://www.nds.org.au/resources/nds-skills-project-2024> [Accessed 26 Mar. 2025].

Victorian Disability Worker Commission, 2025. *Disability worker registration*. [online]

Available at: <https://www.vdwc.vic.gov.au/disability-worker-registration> [Accessed 26 Mar. 2025].