

# **National Aboriginal and Torres Strait Islander Ageing and Aged Care Council**

## **Submission**

**Feedback on National Registration  
Scheme to Support Personal Care  
Workers Employed in Aged Care**

**April 2025**



**NATSIAACC**



# NATSIAACC

National Aboriginal & Torres Strait Islander Ageing  
and Aged Care Council



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# NATSIAACC

National Aboriginal & Torres Strait Islander Ageing  
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## National Aboriginal and Torres Strait Islander Ageing and Aged Care Council

### About

The National Aboriginal and Torres Strait Islander Ageing and Aged Care Council (**NATSIAACC**) is the national peak body for Aboriginal and Torres Strait Islander Ageing and Aged Care. NATSIAACC works to ensure that Aboriginal and Torres Strait Islander Elders and Older People can access support and care that is culturally safe, trauma aware and healing-informed, and recognises the importance of their personal connections to Community, Country and/or Island Home.

NATSIAACC is building a membership base of:

- Aboriginal and Torres Strait Islander Community-Controlled Providers of Ageing and Aged Care, and
- Entities with an interest in culturally appropriate Ageing and Aged Care Services.

NATSIAACC's founding Directors are all leaders in Aboriginal and Torres Strait Islander Ageing and Aged Care provision.

### Our Vision

All Aboriginal and Torres Strait Islander people are thriving, healthy, strong, with ongoing cultural connections in their older years.

### Our Purpose

NATSIAACC supports Aboriginal and Torres Strait Islander Older Peoples, their Families, and Communities to identify, engage in, advocate for, and lead systemic reform to embed culturally safe practices across the Aged Care and Ageing Sector.

### With thanks

NATSIAACC thanks its members, stakeholders, and other peak bodies for their valuable contributions to this submission and for generously giving their time to support older Aboriginal and Torres Strait Islander people.



## Funding

NATSIAACC is funded by the Commonwealth Department of Health and Aged Care (the Department). NATSIAACC has been in operation since 2022. In the context of the current Aged Care reforms and the need for extensive advocacy, input, and leadership in the sector, it will be necessary to provide additional funding to support NATSIAACC to provide the input and engagement required to ensure that the reforms deliver much needed support to Aboriginal and Torres Strait Islander Elders and Older People.

## NATSIAACC Recommendations

### Section 1: National Worker Registration Scheme Design

- To support a public register that shares only essential and non-sensitive details, such as registration status, qualifications, and relevant training. Information that could expose sensitive cultural aspects, including kinship or community relationships, should be excluded.
- To develop a comprehensive data governance framework centred on Aboriginal and Torres Strait Islander data sovereignty. Engage community representatives in decision-making processes to oversee the collection, storage, and disclosure of data.
- Introducing mandatory cultural safety training for all users of the public register, including employers and the general public. This training should focus on addressing systemic racism and fostering respectful engagement with registration information. Such measures are essential to reduce the risk of perpetuating stereotypes and discriminatory practices.
- Allocating targeted administrative support and resources to Aboriginal and Torres Strait Islander Aged Care Providers, especially in remote regions, to assist with public register compliance. Support measures could include funding for administrative staff, technology improvements, and tailored training.
- Introducing strong cybersecurity protocols, such as encryption and access controls, to safeguard data within the public register. Additionally, provide tailored cybersecurity training and resources to remote Aboriginal and Torres Strait Islander Communities.
- Providing diverse ways to access registration information, including phone services, community information centres, and printed materials. These options are essential



for individuals without consistent internet access, helping to bridge the digital divide and promote equitable access to critical information.

- Creating community oversight structures, such as advisory committees and dedicated feedback channels, to evaluate the public register's impact on Aboriginal and Torres Strait Islander Communities.
- Presenting all public register information in plain, easily understandable language, complemented by visual aids. This approach ensures accessibility for individuals with low literacy levels or those whose first language is not English, making the information more inclusive and user-friendly.

## Section 2: Training Requirements

- Introducing a flexible CPD framework that integrates mandatory cultural safety training facilitated by Aboriginal and Torres Strait Islander Experts. This framework should also offer a selection of skill sets and micro-credentials, enabling workers to focus on areas that directly align with their community's specific needs. Establish advisory groups comprising Aboriginal and Torres Strait Islander representatives to rigorously review and approve all training content.
- Developing specialised training modules to address the distinct requirements of in-home and residential care, acknowledging the unique care delivery models in each setting. Emphasise experiential, community-based learning methods to align with Aboriginal and Torres Strait Islander Workers' preferred approaches to training. Additionally, tackle digital literacy challenges by providing accessible technology and tailored support to ensure all workers can effectively engage with training programs.
- Incorporating mandatory training on cultural immersion and historical contexts into all programs, with a strong focus on non-Indigenous care workers. Prioritise values-based recruitment and selection processes to align workers' attributes with the principles of culturally respectful care.
- Additionally, engage Aboriginal and Torres Strait Islander Elders in the delivery of training programs to bring community wisdom and lived experiences into the learning process. Such measures foster genuine understanding and respect, enabling culturally safe and inclusive care practices across the workforce.
- Developing a comprehensive, long-term support systems to overcome the systemic barriers faced by Aboriginal and Torres Strait Islander Workers. These systems should address challenges such as geographic isolation, cultural and linguistic barriers, and systemic racism. Key initiatives include dedicated funding for community-controlled training programs, the establishment of mentorship opportunities, and the provision of accessible technology to bridge digital gaps.



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- Expanding training requirements through a modular, sector-specific framework that prioritises cultural safety and community engagement across industries. Ensure that the training design aligns with the distinct needs of each sector, supporting meaningful and culturally appropriate learning.
- For remote communities, introduce extended transition timeframes to accommodate the unique challenges workers may face. Provide comprehensive support measures during this period, including tailored resources, accessible technology, and financial assistance, to minimise disruptions and promote successful implementation.
- To ensure significant involvement of Aboriginal and Torres Strait Islander Stakeholders in the development of industry products to ensure cultural relevance and community control. Establish professional networks with accessible formats, incorporating both online platforms and offline options to meet the needs of workers in diverse settings, including remote areas.
- Develop funding models that prioritise culturally appropriate training delivery, particularly in rural and remote communities, to address the unique barriers faced by workers.
- Additionally, all materials must be presented in plain language to guarantee clarity and accessibility for everyone, including individuals with low literacy levels or for whom English is not their first language.

### Section 3: Skills and Qualification Requirements

- Implementing mandatory cultural competency training developed and delivered by Aboriginal and Torres Strait Islander Experts as a core requirement for all Aged Care Workers.
- To prioritise a robust, accessible, and culturally appropriate RPL framework that values community-based skills and traditional knowledge.
- Investing in and support community-controlled training programs tailored to the specific needs of Aboriginal and Torres Strait Islander Communities.
- Implementing flexible language assessment methods that recognise diverse communication skills, including non-verbal and contextual understanding.
- Investing in broadband infrastructure and digital literacy programs in remote communities to enable access to online resources.
- Providing financial incentives and support, including scholarships and subsidies, to remove financial barriers to training and employment.



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- Developing and utilising culturally tailored training materials, including resources in Aboriginal languages and plain language formats.
- Implementing specialised training for in-home care workers, focusing on community engagement and cultural brokerage skills.
- Implementing long-term, holistic support systems that address the interconnected barriers faced by Aboriginal and Torres Strait Islander Workers.

## Executive Summary

The National Aboriginal and Torres Strait Islander Ageing and Aged Care Council (NATSIAACC) welcomes the opportunity to contribute to the National Registration Scheme to Support Personal Care Workers Employed in Aged Care. As the national peak body for Aboriginal and Torres Strait Islander Ageing and Aged Care, NATSIAACC advocates for reforms that embed cultural safety, respect self-determination, and support community-led service delivery.

While we acknowledge the intent to improve workforce quality, we emphasise that the scheme must be culturally appropriate, accessible, and inclusive for Aboriginal and Torres Strait Islander Communities.

The consultation process considers the design of the scheme, training, and skills requirements, with an emphasis on harmonisation across Aged Care, disability support, and Veterans' care. While this harmonisation may improve workforce mobility and streamline regulatory processes, NATSIAACC highlights the distinct needs of Aboriginal and Torres Strait Aged Care Workers and Elders and Older People that must be accounted for in any cross-sectoral approach. Cultural safety, flexibility in training pathways, and recognition of community-based skills must be embedded to ensure that harmonisation does not unintentionally create barriers to workforce entry or limit employment opportunities for Aboriginal and Torres Strait Islander Aged Care Workers.

Based on stakeholders and members discussions, including insights from Aged Care Providers, we identified several critical concerns and propose solutions to ensure registration scheme supports, rather than hinders, the participation of Aboriginal and Torres Strait Islander Aged Care Workers. A one-size-fits-all approach risks exacerbating workforce shortages in Aboriginal and Torres Strait Islander Aged Care Services, particularly in remote areas where personal care workers play a crucial role in culturally safe care delivery.

Key concerns include delays in police checks discouraging workforce participation, financial and administrative burdens on under-resourced Aboriginal and Torres Strait Islander Aged Care Services, and limited training accessibility in remote areas. Additional regulatory hurdles deter Aboriginal and Torres Strait Islander Aged Care Workers despite their strong cultural tradition of caring for Elders and Older People. A community-led approach is essential to



ensure Aboriginal and Torres Strait Islander voices shape the scheme, while a harmonised model may not fully align with the need for culturally safe, community-driven care.

To address these concerns, we propose targeted solutions that support, rather than hinder, Aboriginal and Torres Strait Islander workforce participation. These include faster and culturally safe screening processes, recognition of community-based training, dedicated funding for compliance support, and greater involvement of Aboriginal and Torres Strait Islander Organisations in scheme governance.

It is essential that any national framework recognises and strengthens Aboriginal and Torres Strait Islander self-determination in Aged Care, ensuring that policies designed to improve quality do not unintentionally exclude or marginalise Aboriginal and Torres Strait Islander Aged Care Workers and Communities.

## Section 1: National Worker Registration Scheme Design

NATSIAACC acknowledges the Government's commitment to a national worker registration scheme and supports efforts to enhance workforce quality, professionalisation, and protections for older people. However, for the scheme to be effective and equitable, it must be designed with the unique needs of Aboriginal and Torres Strait Islander Communities in mind.

### Public Register

NATSIAACC recognises the benefit of a public register as it promotes transparency and accountability. However, Aboriginal and Torres Strait Islander Communities often have unique cultural and kinship structures. Public disclosure of information, even seemingly innocuous registration details, can inadvertently reveal sensitive family or community relationships. This could lead to breaches of cultural protocols, social stigmatisation or even safety risk in remote settings. A work towards a public register that is both transparent and equitable, and that respects the rights and cultural values of Aboriginal and Torres Strait Islander People can still be viable.

In addition, existing systemic racism and discrimination within the Aged Care System can be exacerbated by a public register. If a worker's registration status is publicly accessible, it could be perpetuating negative stereotypes or biases against Aboriginal and Torres Strait Islander Aged Care Workers, which could lead to exclusion from employment opportunities or unfair treatment. Aboriginal and Torres Strait Islander Aged Care Providers, especially in remote areas, may face administrative burdens due to maintaining and updating public registers, potentially hindering essential services. Remote Aboriginal and Torres Strait Islander Communities may have limited access to cybersecurity resources and support. This could make them more vulnerable to data breaches or misuse of information from a public register. Many Aboriginal and Torres Strait Islander Communities, especially those in remote areas,



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experience a significant digital divide. Reliance on an online public register could exclude these communities from accessing vital information.

## **Responsibility for Collecting Evidence**

This approach has some very significant potentials that could empower workers to take ownership of their professional development while increasing the understanding of their own professional requirements. This would also streamline the process for workers and could ensure consistency in evidence collection. Nonetheless, NATSIAACC members have pinpointed that many Aboriginal and Torres Strait Islander Aged Care Workers, especially in remote areas, may face barriers to accessing and providing documentation due to limited digital literacy, internet access, or formal education. Cultural differences can influence workers' perceptions and engagement with formal documentation processes, potentially disproportionately affecting those with limited resources or support. Providers in the rural and remote areas as well as a small Community-Controlled Aged Care Provider may lack the resources and administrative capacity to effectively manage evidence. There is a risk of providers not collecting information in a culturally safe manner.

A regulatory body should prioritise cultural safety, ensuring Aboriginal and Torres Strait Islander representation at every level. It must be accessible and responsive, particularly to remote area workers, and exhibit a high standard of cultural competence. Strong regulatory oversight is crucial to uphold cultural safety standards and prevent exploitation by providers. Comprehensive cultural safety training and ongoing support for providers are essential. Additionally, a clear and effective complaint process, integrated with a robust and accessible whistleblower policy is required to address culturally unsafe practices reported by workers.

## **Registration Categories**

Provisional registration could help alleviate workforce shortages in Aged Care, particularly in remote and regional Aboriginal and Torres Strait Islander Communities. It enables individuals to join the workforce while completing their training, ensuring continuity of care services. This pathway also offers opportunities for community members with rich cultural knowledge and lived experience to contribute meaningfully to Aged Care, even if they lack formal qualifications. Additionally, it supports skill development through on-the-job training and mentoring, which is especially beneficial in areas with limited access to formal education and training programs.

However, NATSIAACC members recognised that provisional registration poses several potential risks. It could result in a vulnerable workforce, leaving individuals susceptible to exploitation and poor working conditions. There are concerns that workers might remain in provisional roles indefinitely due to inadequate support for transitioning to full registration. Additionally, insufficient oversight may undermine the quality of care delivered to Aboriginal and Torres Strait Islander Elders and Older People. The lack of comprehensive cultural safety



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training for provisional workers raises the risk of culturally unsafe practices, potentially causing harm. Lastly, there is the possibility of inequitable application, with Aboriginal and Torres Strait Islander Aged Care Workers disproportionately placed in provisional roles.

## **Scheme Alignment**

A uniform scheme has the potential to enhance worker mobility across sectors, offering greater employment opportunities for Aboriginal and Torres Strait Islander Aged Care Workers, particularly in remote areas with workforce shortages. Additionally, it could streamline administrative processes for workers and providers, improving efficiency. This approach would be particularly advantageous for smaller Community-Controlled Organisations that operate across multiple sectors.

However, a uniform scheme may overlook the distinct cultural needs and sensitivities of Aboriginal and Torres Strait Islander Communities in different sectors, such as Aged Care, disability support, and Veterans' Care. Each sector demands tailored approaches to address unique cultural considerations. Furthermore, the diverse needs of Aboriginal and Torres Strait Islander Communities across these sectors may not be adequately accommodated by a uniform model. There is also concern that uniformity might undermine Community-Control and input, leading to practices that fail to align with cultural appropriateness. Finally, such a system risks generalising the varied needs of different nations and cultures within Aboriginal and Torres Strait Islander Communities, potentially causing harm through generalisation.

## **Worker's Mobility**

NATSIAACC believes that an electronic passport could streamline the process of transferring credentials and skills between employers, minimising administrative challenges for workers. This would be particularly advantageous for Aboriginal and Torres Strait Islander Aged Care Workers transitioning across care settings or geographic locations. By incorporating a centralised repository of qualifications, the system could effectively match workers with suitable employment opportunities, enhancing their career prospects. Moreover, it could recognise and record diverse skills, such as cultural knowledge and traditional practices, ensuring their value is acknowledged in the workforce.

Aboriginal and Torres Strait Islander Communities, particularly in remote areas, often face limited digital access, raising concerns that an electronic passport system could worsen the digital divide. To ensure cultural sensitivity, the system must respect privacy and align with the cultural values of these Communities. Data sovereignty remains a critical issue, requiring Aboriginal and Torres Strait Islander People to have full control over their personal information. Additionally, the system must be designed for accessibility, accommodating individuals with low digital literacy, and using plain language. There is also a risk that standardising skills and qualifications may fail to capture the depth and diversity of cultural knowledge and traditional practices unique to these Communities.



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## Specific Barriers

Engagement with NATSIAACC members has identified key barriers faced by Aboriginal and Torres Strait Islander Aged Care Workers in Aged Care. Geographic isolation poses challenges such as limited access to training, resources, and reliable internet connectivity, alongside high travel costs for attending assessments. Language barriers and cultural differences hinder understanding of formal requirements, exacerbated by the lack of culturally appropriate training materials and limited cultural safety awareness among non-Indigenous Aged Care Providers.

Systemic racism and discrimination within the sector, coupled with historical inequities in education access, contribute to a lack of formal qualifications, while traditional knowledge and community-based skills remain undervalued. Concerns about data sovereignty and the control of personal and community information further highlight the need for culturally respectful data practices. Moreover, members emphasised the importance of recognising the extensive care experience gained through informal community roles, which has been central to Aboriginal and Torres Strait Islander Communities for generations but is often overlooked in formal registration processes. These barriers underscore the need for a culturally safe and equitable registration framework that values diverse experiences and addresses systemic challenges.

### NATSIAACC recommends:

- To support a public register that shares only essential and non-sensitive details, such as registration status, qualifications, and relevant training. Information that could expose sensitive cultural aspects, including kinship or community relationships, should be excluded.
- To develop a comprehensive data governance framework centred on Aboriginal and Torres Strait Islander data sovereignty. Engage community representatives in decision-making processes to oversee the collection, storage, and disclosure of data.
- Introducing mandatory cultural safety training for all users of the public register, including employers and the public. This training should focus on addressing systemic racism and fostering respectful engagement with registration information. Such measures are essential to reduce the risk of perpetuating stereotypes and discriminatory practices.
- Allocating targeted administrative support and resources to Aboriginal and Torres Strait Islander Aged Care Providers, especially in remote regions, to assist with public register



compliance. Support measures could include funding for administrative staff, technology improvements, and tailored training.

- Introducing strong cybersecurity protocols, such as encryption and access controls, to safeguard data within the public register. Additionally, provide tailored cybersecurity training and resources to remote Aboriginal and Torres Strait Islander Communities.
- Providing diverse ways to access registration information, including phone services, community information centres, and printed materials. These options are essential for individuals without consistent internet access, helping to bridge the digital divide and promote equitable access to critical information.
- Creating community oversight structures, such as advisory committees and dedicated feedback channels, to evaluate the public register's impact on Aboriginal and Torres Strait Islander Communities.
- Presenting all public register information in plain, easily understandable language, complemented by visual aids. This approach ensures accessibility for individuals with low literacy levels or those whose first language is not English, making the information more inclusive and user-friendly.

## Section 2: Training Requirements

NATSIAACC firmly supports the importance of training as a crucial step in professionalising the Aged Care workforce. However, for Aboriginal and Torres Strait Islander Aged Care Workers this training must extend beyond standard skill development. It should be grounded in cultural safety, respect for traditional knowledge, and an understanding of the unique circumstances surrounding care in our communities.

While the Royal Commission's recommendations for ongoing training and professional development are critical, it is essential to ensure these translate into practical, accessible, and culturally appropriate programs that address the specific needs of Aboriginal and Torres Strait Islander Aged Care Workers. Professionalisation should not solely focus on formal qualifications but must also acknowledge and value the significant community-based care experience and traditional knowledge many Aboriginal and Torres Strait Islander People possess. Any training framework must be developed in collaboration with Aboriginal and Torres Strait Islander Communities and Organisations, ensuring their voices are central to its design and implementation.



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## **Continuing Professional Development (CPD)**

A rigid, hours-based training system fails to adequately reflect the diverse skills and knowledge essential in Aboriginal and Torres Strait Islander Aged Care Workers. Instead, adopting a flexible framework comprising skill sets and micro-credentials would allow workers to focus on areas most relevant to their roles and community needs. Key training components must include cultural safety and competency programs led by Aboriginal and Torres Strait Islander Experts, alongside trauma-informed care, culturally appropriate end-of-life care, dementia care tailored to cultural contexts, traditional healing methods, digital literacy, and language training to support communication with Aboriginal and Torres Strait Islander Elders and Older People.

Current mainstream training options often lack cultural competency and fail to address the specific needs of Aboriginal and Torres Strait Islander Communities. Advocacy efforts should prioritise partnerships with Aboriginal and Torres Strait Islander Training Providers and Community-Controlled Organisations to develop and deliver culturally appropriate programs. Any existing training must undergo thorough audits by Aboriginal and Torres Strait Islander Advisory Groups before being deemed suitable.

A collaborative approach to training frameworks is crucial, ensuring the needs of both employers and individual workers are addressed. Relying solely on employers' risks overlooking worker and community needs, while expecting individuals to independently manage training requirements may lead to incomplete participation. By integrating cultural safety, flexibility, and community-centred collaboration, the training system can better support Aboriginal and Torres Strait Islander Aged Care Workers in Aged Care.

## **Provider setting and Modes of Training**

Aboriginal and Torres Strait Islander Communities have distinct care needs and delivery models, particularly in remote and rural regions. In-home care often encompasses a broader scope of responsibilities, including engaging with the community, navigating logistical challenges, and addressing social determinants of health. Residential Aged Care settings, while requiring specialised expertise, also benefit significantly from culturally tailored training to ensure care is both safe and respectful. Importantly, care provided by family members within communities differs substantially from care delivered by non-family members, highlighting the need for tailored approaches that respect these dynamics.

Training methods for Aboriginal and Torres Strait Islander Aged Care Workers should reflect their preferred learning styles, which often involve experiential, hands-on, and community-based techniques. Traditional knowledge and cultural practices are best preserved and passed down through oral traditions and practical engagement. However, disparities in digital literacy and access to technology across communities must be addressed to ensure equitable access to training opportunities. Designing culturally appropriate and accessible training



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programs is essential to supporting Aboriginal and Torres Strait Islander Aged Care Workers and their unique contributions to Aged Care.

## **Culturally appropriate values and attributes**

NATSIAACC members strongly emphasise that values and personal attributes are fundamental to delivering culturally safe and respectful care to Aboriginal and Torres Strait Islander Elders and Older People. These values must go beyond general concepts like empathy and respect, embedding a deeper understanding of cultural protocols, historical contexts, and the ongoing effects of colonisation. Members assert that training programs must not assume these values are inherent but actively work to cultivate them in care workers.

Furthermore, members stress the importance of cultural immersion training for non-Indigenous care workers. This form of training enables them to truly understand and appreciate the communities they serve, fostering culturally sensitive and informed care. Such approaches ensure that care delivery aligns with the unique needs and expectations of Aboriginal and Torres Strait Islander Communities.

## **Implementation Support**

Members stress that effective implementation must take a comprehensive approach to address the systemic barriers impacting Aboriginal and Torres Strait Islander Aged Care Workers. These barriers, often interlinked, call for long-term and sustainable solutions rather than temporary exemptions. Members also emphasise on the importance of providing robust support systems to empower these workers to thrive.

Key challenges include geographic isolation, which limits access to training providers and resources, as well as cultural and linguistic differences that can impede effective communication. Systemic racism and discrimination further exacerbate these issues, alongside limited access to technology in remote regions. Members underscore the need for holistic strategies that not only mitigate these challenges but actively create pathways for success for Aboriginal and Torres Strait Islander Aged Care Workers in Aged Care.

## **Expansion to other sector and Transition Timeframe**

NATSIAACC recognise the potential benefits of expanding training requirements across the care and support economy but stress the importance of addressing the unique needs of Aboriginal and Torres Strait Islander Communities. A “one-size-fits-all” approach risks ignoring cultural complexities and may create unintended challenges. Members advocate for a strong focus on cultural safety and community engagement training, which must be prioritised to ensure the expanded requirements are both effective and culturally appropriate.

For transition timeframes and phasing arrangements, members highlight that workers in remote areas may require extended periods to adapt to new training requirements. These



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arrangements must be carefully structured to avoid undue hardship or disruption to essential services. Additionally, adequate support and resources, such as accessible training programs and financial assistance, are essential during the transition period to ensure a smooth implementation that supports Aboriginal and Torres Strait Islander Aged Care Workers and their Communities.

## Additional Consideration

NATSIAACC acknowledge that an industry-led product could be highly beneficial but stress that its development must involve meaningful input from Aboriginal and Torres Strait Islander Stakeholders to ensure it aligns with cultural values and practices. A professional network for knowledge sharing is also viewed as valuable, provided it remains accessible and inclusive, particularly for workers in remote communities. Members highlight the importance of funding models that address the specific needs of Aboriginal and Torres Strait Islander Aged Care Workers and Providers in rural and remote areas, with a focus on supporting culturally appropriate training delivery and community-based initiatives.

Barriers to training uptake, including financial constraints, geographic isolation, and cultural and linguistic differences, must be addressed through culturally sensitive support initiatives. Flexibility in training programs is crucial to accommodate the diverse needs of workers and allow for the inclusion of non-core areas of knowledge, such as traditional healing practices and community development. Members advocate for a comprehensive approach that prioritises the unique perspectives and requirements of Aboriginal and Torres Strait Islander Aged Care Workers, ensuring their success and sustained engagement in the Aged Care workforce.

### NATSIAACC recommends:

- Introducing a flexible CPD framework that integrates mandatory cultural safety training facilitated by Aboriginal and Torres Strait Islander Experts. This framework should also offer a selection of skill sets and micro-credentials, enabling workers to focus on areas that directly align with their community's specific needs. Establish advisory groups comprising of Aboriginal and Torres Strait Islander representatives to rigorously review and approve all training content.
- Developing specialised training modules to address the distinct requirements of in-home and residential care, acknowledging the unique care delivery models in each setting. Emphasise experiential, community-based learning methods to align with Aboriginal and Torres Strait Islander Aged Care Workers' preferred approaches to training. Additionally, tackle digital literacy challenges by providing accessible technology and tailored support to ensure all workers can effectively engage with training programs.



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- Incorporating mandatory training on cultural immersion and historical contexts into all programs, with a strong focus on non-Indigenous care workers. Prioritise values-based recruitment and selection processes to align workers' attributes with the principles of culturally respectful care.
- Additionally, engage Aboriginal and Torres Strait Islander Elders and Older People in the delivery of training programs to bring community wisdom and lived experiences into the learning process. Such measures foster genuine understanding and respect, enabling culturally safe and inclusive care practices across the workforce.
- Developing a comprehensive, long-term support systems to overcome the systemic barriers faced by Aboriginal and Torres Strait Islander Aged Care Workers. These systems should address challenges such as geographic isolation, cultural and linguistic barriers, and systemic racism. Key initiatives include dedicated funding for community-controlled training programs, the establishment of mentorship opportunities, and the provision of accessible technology to bridge digital gaps.
- Expanding training requirements through a modular, sector-specific framework that prioritises cultural safety and community engagement across industries. Ensure that the training design aligns with the distinct needs of each sector, supporting meaningful and culturally appropriate learning.
- For remote communities, introduce extended transition timeframes to accommodate the unique challenges workers may face. Provide comprehensive support measures during this period, including tailored resources, accessible technology, and financial assistance, to minimise disruptions and promote successful implementation.
- To ensure significant involvement of Aboriginal and Torres Strait Islander Stakeholders in the development of industry products to ensure cultural relevance and community control are embedded. Establish professional networks with accessible formats, incorporating both online platforms and offline options to meet the needs of workers in diverse settings, including remote areas.
- Develop funding models that prioritise culturally appropriate training delivery, particularly in rural and remote communities, to address the unique barriers faced by workers.
- Additionally, all materials must be presented in plain language to guarantee clarity and accessibility for everyone, including individuals with low literacy levels or for whom English is not their first language.



## Section 3: Skills and Qualification Requirements

NATSIAACC recognises the importance of establishing skill and qualification benchmarks for Aged Care personnel to enhance service quality and client wellbeing. However, it asserts that a national framework must be thoughtfully designed to respect the unique cultural contexts and needs of Aboriginal and Torres Strait Islander Communities. A standardised, uniform approach risks undermining the vital contributions of cultural knowledge, ancestral expertise, and community-based skills critical to delivering effective and respectful care.

Members quoted that imposition of new training mandates raises serious concerns about cost, quality, and delivery, especially for remote communities. They pointed out, online training isn't a viable option for everyone, and the validity of training providers can be unreliable. This is particularly problematic for Aboriginal and Torres Strait Islander Aged Care Workers in remote areas who may lack access to reliable internet or local training facilities. The cumulative effect of these requirements is an increased administrative and financial burden on Aged Care Providers, diverting resources from essential care delivery.

NATSIAACC advocates for a system that balances formal qualifications with the acknowledgment of experiential learning and cultural competency. This ensures the recognition of Aboriginal and Torres Strait Islander Aged Care Workers' unique strengths while providing culturally relevant care for Elders and Older People.

This approach aligns with the *Bringing Them Home* report<sup>1</sup>, which underscores the significance of community-centred care, as well as National Aboriginal Community Controlled Health Organisation (NACCHO)'s principles of culturally appropriate service delivery<sup>2</sup>. It also supports the recommendations of the Royal Commission into Aged Care Quality and Safety, which emphasises culturally safe and responsive care models.

NATSIAACC stresses that a poorly constructed national framework could perpetuate existing inequities. Therefore, it recommends a balanced approach that integrates formal credentials with lived experience and cultural knowledge, ensuring that Aboriginal and Torres Strait Islander Aged Care Workers are valued, and Elders and Older People receive care that is both skilled and culturally appropriate.

### Minimum Skills and Qualifications

To ensure culturally safe and effective care for Aboriginal and Torres Strait Islander Communities, any minimum skills and qualification framework must place cultural competency as a core principle rather than treating it as an optional addition. Recognition of traditional knowledge and community-based expertise must be integrated into the

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<sup>1</sup> National Inquiry into the Separation of Aboriginal and Torres Strait Islander Children from Their Families (Australia), & Wilson, R. (1997). *Bringing them home*. Human Rights and Equal Opportunity Commission.

<sup>2</sup> NACCHO. (n.d.). NACCHO Core Services and Outcomes Framework. <https://csof.naccho.org.au/>



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framework, preventing the exclusion of workers whose skills may not align with Western-style qualifications.

Skills should be contextualised to reflect the diverse cultural practices and beliefs of Aboriginal and Torres Strait Islander Communities, ensuring that training is relevant and respectful of these unique contexts. Accessibility and equity must remain priorities, with minimum requirements designed to avoid imposing barriers on workers in remote areas or those with limited formal education opportunities. Minimum requirements must not create barriers for workers in remote communities or those with limited access to formal education.

## **Current Vocational Education and Training (VET)**

Current Vocational Education and Training (VET) programs in Australia require careful evaluation to ensure they meet the needs of Aboriginal and Torres Strait Islander Communities. Certificates III and IV in Individual Support and Ageing/Disability Support, while foundational and advanced qualifications respectively, lack comprehensive cultural competency training and fail to address the specific needs of these Communities. They often exclude traditional healing methods, community-based care practices, and are inaccessible to remote learners. Similarly, skill sets and micro-credentials, though targeted, vary widely in cultural relevance and lack consistency in quality and cultural safety.

Mainstream training providers frequently face challenges such as culturally inappropriate materials, a shortage of culturally competent trainers, and delivery methods that are not community-based, further limiting access and impact. A reimagined framework that incorporates cultural competency, traditional knowledge, and accessible, community-focused training delivery is essential to address these gaps and ensure effective support for Aboriginal and Torres Strait Islander Aged Care Workers and their Communities.

## **Differentiated Requirements and Recognition of Experience**

From NATSIAACC's perspective, it is vital to differentiate requirements for new and existing workers while recognising the unique experience of Aboriginal and Torres Strait Islander Aged Care Workers. Many existing workers possess invaluable community-based skills and traditional knowledge, which are critical to delivering culturally safe and effective care. However, imposing rigid new qualification requirements risks excluding these experienced individuals and could result in significant workforce losses.

For new workers, a strong foundation in care skills and cultural competency is essential. Training must be designed to address the specific needs of Aboriginal and Torres Strait Islander Communities and uphold culturally safe practices.

Recognition of Prior Learning (RPL) is a key mechanism for valuing the skills and knowledge of existing workers. This process must be accessible, robust, and co-designed with Aboriginal and Torres Strait Islander input to ensure it acknowledges community-based care expertise.



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Without such consideration, new qualification requirements could disproportionately disadvantage existing Aboriginal and Torres Strait Islander Aged Care Workers, potentially leading to direct or indirect discrimination. A balanced, inclusive approach is essential to maintain a skilled and culturally competent workforce while fostering equitable opportunities for all workers.

## **Impact of increased Mandatory Skill Based Requirements**

Increased skill requirements could significantly affect the supply of personal care workers, particularly within Aboriginal and Torres Strait Islander Communities. Many existing workers possess vital community-based skills and traditional knowledge but lack formal qualifications. Introducing rigid new requirements risks excluding these experienced individuals, potentially resulting in substantial workforce losses, especially in remote areas with limited access to training providers.

Stringent requirements may also discourage potential workers, particularly those facing challenges such as limited formal education, language barriers, digital illiteracy, financial constraints, and geographic isolation. For remote communities already experiencing workforce shortages, such changes could exacerbate the issue, reducing access to essential care services.

If the requirements prioritise mainstream qualifications without addressing cultural competence, the workforce might become technically skilled but culturally unprepared to provide respectful and effective care. Recognition of Prior Learning (RPL) is critical to valuing existing workers' experience and expertise. However, without an accessible and robust RPL process that includes community-based care skills, these essential contributions risk being overlooked.

## **English Language and communication skills Requirements**

The Royal Commission's recommendation to set minimum English language requirements does not sufficiently address the complexities of communication within Aboriginal and Torres Strait Islander contexts. It often overlooks the diversity of Aboriginal languages, dialects, and cultural communication styles, failing to resolve potential issues related to miscommunication and unequal power dynamics.

Many Aboriginal and Torres Strait Islander Aged Care Workers, especially those in remote areas, have limited access to formal English education, creating challenges in understanding medical or care-related instructions. Mainstream assessments frequently disregard cultural communication methods that rely on non-verbal cues and contextual knowledge, compounding the difficulties faced by these workers. Digital illiteracy further restricts opportunities to access language-learning resources, adding another layer of barriers.



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Strict language requirements risk excluding experienced Aboriginal and Torres Strait Islander Aged Care Workers, leading to workforce shortages in remote communities and restricting access to culturally appropriate care. These requirements also disproportionately affect individuals who speak Kriol or other Aboriginal languages, creating inequities within the Aged Care Sector.

NATSIAACC members suggest a more inclusive approach must recognise the linguistic diversity and cultural communication practices of Aboriginal and Torres Strait Islander Aged Care Workers. Training and support should be designed to foster accessible and culturally sensitive communication pathways that better serve the workforce and the communities they support.

## **Implementation Support for Skill Requirements**

From the perspective of NATSIAACC members, effective implementation support for mandatory skill requirements must address the unique and interconnected challenges faced by Aboriginal and Torres Strait Islander Workers. Geographic isolation significantly restricts access to training, while the digital divide and unreliable internet access hinder online learning opportunities. Cultural and linguistic diversity necessitates training programs that are specifically tailored to meet the needs of Aboriginal and Torres Strait Islander Aged Care Workers, acknowledging the impacts of historical trauma and systemic racism, which often result in barriers to trust. Financial constraints further compound these inequities, emphasising the necessity of delivering training on-Country and/or Island Home to ensure accessibility and cultural relevance.

A holistic approach is required to overcome these barriers, focusing on long-term, sustainable solutions rather than short-term exemptions. Community-Controlled initiatives are essential to ensure support systems are both culturally safe and effective. In regional, rural, and remote areas, the lack of training providers and gaps in technology infrastructure demand innovative approaches, such as delivering training directly within communities rather than requiring workers to travel.

In-home care poses additional considerations, often requiring workers to navigate complex social determinants of health. As such, specialised training in community engagement and cultural brokerage is critical to reflect the unique dynamics of providing care within community settings. By prioritising these measures, NATSIAACC advocates for equitable, culturally tailored support systems that empower Aboriginal and Torres Strait Islander Aged Care Workers and address the broader systemic challenges they face.



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## NATSIAACC recommends:

- Implementing mandatory cultural competency training developed and delivered by Aboriginal and Torres Strait Islander Experts as a core requirement for all Aged Care Workers.
- To prioritise a robust, accessible, and culturally appropriate RPL framework that values community-based skills and traditional knowledge.
- Investing in and support Community-Controlled training programs tailored to the specific needs of Aboriginal and Torres Strait Islander Communities.
- Implementing flexible language assessment methods that recognise diverse communication skills, including non-verbal and contextual understanding.
- Investing in broadband infrastructure and digital literacy programs in remote communities to enable access to online resources.
- Providing financial incentives and support, including scholarships and subsidies, to remove financial barriers to training and employment.
- Developing and utilise culturally tailored training materials, including resources in Aboriginal and Torres Strait Islander languages and plain language formats.
- Implementing specialised training for in-home care workers, focusing on community engagement and cultural brokerage skills.
- Implementing long-term, holistic support systems that address the interconnected barriers faced by Aboriginal and Torres Strait Islander Workers.



## Conclusion

In summary, NATSIAACC's submission highlights the critical need for a National Registration Scheme that genuinely supports, rather than inadvertently hindering, the participation of Aboriginal and Torres Strait Islander Workers in the Aged Care Sector. We acknowledge the Government's intention to enhance service quality through standardised qualifications and training. However, we strongly advocate that these initiatives be firmly grounded in cultural safety, community-led approaches, and the recognition of traditional knowledge. A "one-size-fits-all" framework carries the risk of exacerbating existing inequities, particularly in remote communities, and undermining the invaluable contributions of Aboriginal and Torres Strait Islander Workers.

Our recommendations, derived from extensive member and stakeholder consultations, promote a nuanced approach. This approach balances formal qualifications with experiential learning, prioritises community-based training, and ensures equitable access to resources. We urge the adoption of culturally appropriate training models, robust recognition of prior learning (RPL) processes, and flexible language and communication assessments. Furthermore, we emphasise the crucial importance of Aboriginal and Torres Strait Islander involvement in the design and implementation of all facets of the scheme, from public registers to funding models.

By embracing these recommendations, the Government can ensure that the National Registration Scheme simultaneously enhances the professionalism of the Aged Care workforce, empowers Aboriginal and Torres Strait Islander Workers, and safeguards the cultural integrity of care delivery to our Elders and Older People. It is therefore imperative that the scheme reflects the principles of self-determination, cultural safety, and community control, guaranteeing that our Elders and Older People receive care that is both skilled and culturally resonant.

We look forward to a continued collaboration with the Government to achieve these vital objectives.



**NATSIAACC**