



Department of the Treasury

Department of Finance

Via: <https://consult.treasury.gov.au/c2025-695985> or

CareSectorWorkerScreening@finance.gov.au

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

VolunteeringACT is the peak body for volunteering and represents over 200 community organisations and advocates for volunteers and those organisations that involve volunteers. We provide community information services in the Canberra region. We also deliver programs for people experiencing disadvantage and isolation, people with disability, and people needing support for mental wellness. VolunteeringACT has a vision of an inclusive Canberra, and a mission to foster inclusion by enabling participation and connection.

Volunteers make up a major sector of the care economy ecosystem and how they interact and participate in screening should be considered a key priority for any reforms in the screening processes. The safety of vulnerable cohorts is paramount to the work that volunteers and staff do in the caring sector. We appreciate the consideration that has gone into preparing the report for the *“National approach to worker screening in the care and support economy.”*

VolunteeringACT has long worked with the ACT government in influencing and shaping local legislation. We have a very clear understanding of the difficulties of cross jurisdictional issues for worker screening due to the way the population migrates across the country. The ACT sees many transient workers that face confusion, difficulties and higher costs in navigating the cross jurisdictional aspects of screening. There are also issues with cross border duplication as we are surrounded by NSW, with many care and support services working across Canberra and the surrounding NSW local government areas. Our own research points to screening checks being a significant barrier to people volunteering and VolunteeringACT supports changes that will streamline and support volunteers in the ACT and surrounding areas to engage with the support and care economy.

In our experience of the ACT Working with Vulnerable People (WWVP) Scheme, the screening Scheme quickly became over-subscribed, particularly due to volunteers wanting to do the right thing and volunteer involving organisations taking a risk-based approach to protect themselves and their volunteers. As the paper points out, the care and support economy is expected to double in size by 2050 and any scheme put forward needs to have the capacity to cope with the increase. For any updated model to be successful, the government would need to ensure it has undertaken accurate modelling to fully understand the landscape of the caring ecosystem in both paid and voluntary capacities.

Thank you for the opportunity to provide input into the work being conducted to deliver a nationally consistent screening process for the care and support economy. Please find the following responses to the questions posed by the *National Competition Policy: National approach to worker screening in the care and support economy* paper. We welcome the opportunity to engage further with this process to ensure that any national worker screening process is suitable for volunteers and volunteer involving organisations and balances the safety of care recipients against any unintended consequences for the volunteers who support them.

Kind regards,

A handwritten signature in black ink, appearing to read 'Jean Giese', with a stylized flourish at the end.

Jean Giese
Chief Executive Officer

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1. Do these challenges resonate with your experience of worker screening? Are there any other issues that we should consider?

In the ACT context, there is complexity and confusion over what are regulated activities that trigger the requirement for a WWVP (WWVP) card. VolunteeringACT advocates that as screening checks move to cover multiple vulnerable cohorts, the WWVP Scheme is engineered to be as simple as possible. Many volunteer involving organisations exercise caution by requiring all volunteers to obtain a check even if they are not working in a regulated activity. Because the ACT system conducts spot checks and applies penalties for lack of compliance, VIOs often take a risk mitigation approach by applying a blanket requirement for all volunteers and staff to hold a WWVP card. However, this has potentially contributed to the scheme being oversubscribed and may contribute to the inefficiencies, delays and fragmentation that your report describes.

2. What components of the existing worker screening systems work well and should be kept under a national approach?

We strongly advocate that screening checks continue to be delivered free of charge for volunteers. In the ACT, volunteers spend \$12.76 for every hour they spend volunteering.¹ Nationally, volunteers spend \$13.97 for every hour they spend volunteering.² Volunteers already face significant financial burdens to volunteer and we do not support adding to this burden which would reduce an already shrinking volunteer base. The ACT recently reversed a budget announcement to add a cost to WWVP screening checks for volunteers after feedback from the community. We highly recommend that no cost is imposed for screening checks for volunteers in any national scheme moving forward.

3. To what extent do the anticipated benefits of the proposed reforms reflect your expectations for an improved worker screening process? Are there any additional benefits you believe we should consider to further strengthen the outcomes?

VolunteeringACT supports the proposals put forth in the paper particularly the second option which provides the best model for an inclusive, authentic and functional national scheme. Further to this, VolunteeringACT believes that an educative and informative collateral package on the role that screening plays is essential to guide participants in the proposed reforms for the care and support sector. There needs to be a community education campaign that explains that these schemes act as a safety net which work alongside robust organisational policy, procedures and reporting mechanisms.

¹ [State of Volunteering in the ACT 2024](#)

² [Snapshot of Volunteering in Australia 2023](#)

4. What are the key issues with national consistency in worker screening for the care and support economy? How could these issues be overcome?

VolunteeringACT acknowledges that the biggest issue for a nationally consistent screening scheme will be gaining a consensus from States and Territories. VolunteeringACT suggests learning from the challenges faced by the Commonwealth Department of Education in establishing the Unique Student Identifier. This project was also tasked with alleviating difficulties with data sharing, tracking and inefficiencies across jurisdictions. We advocate that the Treasury seeks advice and information from other Commonwealth departments on how they have successfully and effectively merged data collections and information sharing.

5. How can the government ensure safety outcomes are upheld, while improving the simplicity and efficiency of worker screening processes?

To manage any complexity of any care worker screening, departments need to be resourced sufficiently to manage the complexity of workload and any investigations into adverse findings, as well as expected timeframes for approvals. How information is shared, how participants are notified and how workplaces are alerted in a timely and efficient manner is imperative to the success of the introduction of any new scheme.

6. Are there specific barriers to, or opportunities for, improving worker screening to make it more efficient and suitable for particular groups or organisations, such as First Nations care workers or Aboriginal Community-Controlled Organisations?

As stated above, any worker screening needs to consider the role of volunteers in the care economy.

7. Are these key design elements comprehensive? What other considerations should be included and why?

It is important to ensure the interplay of National Coordinated Criminal History Check (NCCHC) and other screening checks such as the National Disability Insurance Scheme are considered in any new care worker screening scheme. The NCCHC is a point in time assessment while the other checks require ongoing monitoring. Why one aspect is mandatory, and the other is optional, potentially leaves a loophole in the checking process. Further to this, there is added complexity and duplication with State and Territory police checks.

While considering screening processes, it needs to be noted that the national criminal history check for volunteers is clunky and unclear. The Australian Criminal Intelligence Commission makes it clear that volunteers should not be burdened financially; it is unclear what the actual cost is for volunteers for this screen as third party accredited screening services use different processes. We recommend all accredited screening services should have consistent rules for how they manage volunteer screening with no costs involved.

A better design could enable an initial point in time criminal history check that serves as a gateway to employment or volunteering before moving to a next stage of ongoing screening. Viewing worker screening as a process may eliminate the pressures to deliver timely approvals in the ongoing screening process.

8. What synergies and tensions do you see between these elements? How should these be addressed?

The strength of separate checks for different areas of the care and support economy lies in the ability to apply nuanced requirements for the different needs of the different sub sectors. Moving to an overarching screening system may remove some of the visibility of these nuanced requirements; this risk could be mitigated through the creation of standards for screening outcomes for each sub-sector. It will be important to balance the need to mitigate the risk of accepting adverse findings in an area that is not applicable to a role in the care and support sector against the risk of discriminating a person with an adverse finding.

11. Are there additional design features that we should include under both options? Are there any gaps or opportunities that have not been identified yet?

Some States and Territories have a portal for employers and applicants to see the status of the screening check. This functionality would be great for organisations in managing compliance. Additionally, the report considers the differences in reporting requirements across jurisdictions. A missing function for the scheme is how organisations and businesses report their own concerns, adverse findings and investigations about participants within the scheme and how this information might be shared across jurisdictions.

A key consideration to remember is that screening checks form a safety net. But the requirements is still to deliver systemic safety for vulnerable people who use the care and support economy. This requires the vigilance of operators within the systems to maintain the system's integrity. The bulk of the responsibility to protect vulnerable people rests in organisations and businesses having effective policies and procedures to report suspicious activity as well as capacity to investigate claims. A government run screening scheme cannot be seen as a catch all for nefarious actors and holistic actions needs to be undertaken to ensure the circle is closed with suitable reporting avenues. Therefore, the one front door model should also capture reporting and compliance functions.

12. Which proposed model do you prefer? Please provide reasons why/why not.

VolunteeringACT supports the most inclusive and streamlined service that removes the duplication of multiple checks. We see the end goal for this project as a seamless, nationally integrated screening system that works to close gaps in the screening safety net for all sectors and both workers and volunteers in the caring and support economy.

14. What risks, challenges or unintended consequences could arise when implementing a national approach to worker screening? How should we mitigate them?

The biggest challenge VolunteeringACT sees is ensuring the highest level of screening without any reduction in coverage of workers and volunteers requiring screening. Similarly, if moving to model 2, it would be important to maintain visibility of the individual needs of each check. The rigour that comes from situational application should be maintained, but as previously suggested, we believe this could be maintained via the use of standards. Furthermore, while the majority of States and Territories do not impose screening costs for volunteers, we reiterate that charges should not be applied to volunteer checks given the heavy reliance on a volunteer workforce in the care and support economy.