

8 September 2025

Trish Garrett
First Assistant Secretary, Service Delivery
Department of Health, Disability and Ageing
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cc: Rose van Dijk, Aged Care Volunteering Policy, agedcarevolunteer@health.gov.au

Dear Ms Garrett

Volunteering in aged care mandatory training consultation

Ageing Australia welcomes the opportunity to provide feedback on the proposed mandatory training for volunteers in aged care, intended to support legal requirements under the *Aged Care Act 2024* (new Aged Care Act).¹

As the national peak body for aged care, Ageing Australia represents providers across retirement living, seniors housing, residential care, home care, and community services. We advocate for our members by providing expert advice, resources, and tailored services to ensure the delivery of exceptional care for older Australians.

We appreciate the Department of Health, Disability and Ageing (Department) taking a proactive approach in promoting safe, inclusive, and respectful care environments. Notwithstanding, we do not support the introduction of mandatory training requirements for volunteers in aged care, given the risk this poses to the volunteer workforce.

Ageing Australia's rationale and recommendations are provided below.

Summary of Recommendations

- R1 The Department's proposed volunteer training program is not mandated, given the risk it poses to the volunteer workforce.**
- R2 The Department provide training resources to support volunteers in meeting their obligations under the rights-based new Aged Care Act.**
- R3 The Department engage with volunteers and providers to develop a practical and proportionate training approach to pilot.**

Mandatory training for volunteers not suitable at this time

Ageing Australia recommends the Government does not introduce a mandatory training program for volunteers at this time. Mandating requirements risk the following:

- volunteers leaving the sector if training requirements are perceived to be too burdensome, which could have a disproportionate impact for not-for-profit providers, providers in rural and remote areas, and smaller providers
- opportunities for volunteers being reduced if it causes additional responsibilities for the provider that cannot readily be integrated into existing workforce and volunteer training programs.

¹ *Aged Care Act 2024* (Cth) s 11(4).

- administrative resources being diverted away from implementing a provider's pre-established mandatory training program, in order to accommodate a separate program for volunteers (that is unfunded).

R1 The Department's proposed volunteer training program is not mandated, given the risk it poses to the volunteer workforce.

Training resources needed to support volunteers

We support the Department's intent to equip volunteers with accessible resources that enable them to work within the rights-based Aged Care Act. We recommend the Department engage directly with volunteers and providers on the modes of training they find most useful, how this training could be integrated with existing workforce training, and how training can be designed to accommodate varied volunteer roles.

Accordingly, we recommend that volunteers are provided with targeted and role-based resources to support them to meet the obligations under the rights-based new Aged Care Act.

Furthermore, many volunteer hours are delivered in registration categories 1, 2 and 3 - often supporting clients with high needs and involving lone-working situations. It is therefore important that any training is accessible to volunteers delivering services in all registration categories.

R2 The Department provide training resources to support volunteers in meeting their obligations under the rights-based new Aged Care Act.

Pilot a training approach

We recommend the Department develop a practical and proportionate training approach to pilot on an opt-in basis. This approach would allow providers that have additional capacity (beyond implementing high-priority reform initiatives), to be involved in trialling, which can then be shared more broadly at a pace that reflects sector capacity.

This pilot would also enable the Department to gauge the funding and implementation support that may be required to deliver this program. It would also enable an analysis of program outcomes, and alignment with objectives before considering implementation on a broader scale.

R3 The Department engage with volunteers and providers to develop a practical and proportionate training approach to pilot.

While we support the underlying intent of the proposed training manual, Ageing Australia does not support mandatory training. Our position is consistent with our broader stance on aged care workforce reform: measures must be proportionate, practical, and sufficiently funded to support sector sustainability. Volunteers, like paid staff, are essential to the sector's functions and are considered an aged care worker under the new Aged Care Act. The Department's commitment to providing free, consistent training resources will be a positive outcome for volunteers and the sector in supporting rights-based care.

We look forward to continuing to work with the Department on this important initiative.

Thank you again for the opportunity to provide feedback on this proposal. Please contact Anne Liddell, Head of Strategic Policy at anne.liddell@ageingaustralia.asn.au if you have any questions or would like to discuss our feedback.

Yours sincerely,

Roald Versteeg
General Manager Policy and Advocacy