

Competition Review
The Treasury and Department of Finance
By email: CareSectorWorkerScreening@finance.gov.au.

3 October 2025

Dear Competition Review Taskforce

National approach to worker screening in the care and support economy

Introduction

The Council of Small Business Organisations (COSBOA) is the peak industry association representing small business interests across Australia. Small businesses are major providers of care related services, from general healthcare and allied health to early learning and community care. They play a central role in supporting the wellbeing of Australians across the community.

As highlighted in our submission to the Productivity Commission following their interim report, small business providers face an overwhelming administrative burden along with regulatory inconsistencies with state and federal rules contradicting each other in some circumstances. The current fragmented system means care providers operating across jurisdictional borders or multiple care sectors must navigate a complex web of compliance requirements, often duplicating efforts to meet similar but slightly different screening standards.

Whilst COSBOA supports the move towards a unified national worker screening framework (Option 2), member feedback suggests that Option 1 is better suited in the immediate term. Our response to some of the questions outlined in the Consultation Paper can be found below in Annexure A.

Conclusion

A nationally consistent worker screening framework represents an opportunity to simultaneously improve safety standards while reducing regulatory burden on businesses in the care economy.

COSBOA looks forward to the ongoing consultation required through the development of a unified approach.

Kind regards,

A handwritten signature in black ink, appearing to read 'Matthew Addison', is positioned above the printed name.

Matthew Addison
Chair, COSBOA

Annexure A

Responses to questions

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

Yes, the challenges outlined in the paper resonate with the experience of our members. COSBOA agrees that holistic consideration of worker screening and registration will enhance quality and safety for care and support economy (CSE) recipients.

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

Our member, Massage & Myotherapy Australia, have outlined components of the system that work well in their submission.

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?

The anticipated benefits align with COSBOA and our members' expectations. One of the biggest benefits being worker mobility and reducing onboarding delays whilst also ensuring checks and all administrative requirements are up to date. This will mean better quality of care being provided to those in need.

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

Following member input, we understand that there are gaps in fully 'closing the knowledge gap' even with relevant checks already in place. There is a need for a list outlining the national list of prohibition orders or based issued against health service providers, and those under investigation. This will allow better screening of applicants in the CSE.

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

It is imperative that Government creates a unified approach with a streamlined digital verification system that:

- provides real-time verification capabilities accessible to providers;
- eliminates paperwork through digital worker credentials;
- integrates with existing business systems where possible; and
- offers simplified verification processes suitable for operators without dedicated HR departments.

Ensuring the system is fit for the 21st century is key in upholding safety outcomes because it allows information to be shared rapidly, updated as required, and reduces the administrative burden of looking at multiple different sites and documents.

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?

Based on feedback received from our Members, we understand that the NDIS database is not a suitable facility for screening all unregistered health care providers that work in the CSE. For example, Professional Massage therapists' training and competencies are not recognised compensable services under the NDIS system, however in the Aged Care Home Care Package they are included as Allied Health providers.

These will need to be considered when service records are aligned in a unified approach.

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

Yes, the design elements are broadly comprehensive. Specifically, ensuring that regulation should enhance safety at the lowest possible cost is key in current economic conditions. For small businesses, this includes consideration of fee structures that recognise their limited resources, and ensuring verification systems are accessible without requiring advanced technical capabilities.

Additionally, any regulatory reform needs to consider the full regulatory landscape and ensure that there is no added complexity.

8. Do the common design features appropriately and effectively support a national approach to worker screening? Please provide reasons why/why not.

Yes, the common design features appropriately and effectively support a national approach. Several of the design features relate to digital uplift or expansion of government systems which must be appropriately developed to ensure worker screening is possible.

A single front door through myGov or Digital ID is useful because most individuals will already have this set up and it ties in with other government services and use. It will allow all checks to live in one place, in line with a "tell us once" approach and without the requirement to set up a new verification tool.

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

A confidential search tool to cross-check prohibition and conduct orders would be useful.

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

Whilst COSBOA is supportive of Option 2 in the longer term where there is a single national screening approach with full portability across jurisdictions. We understand this will not be implemented in a reasonable time-frame. As a result, in the immediate-term, COSBOA members have suggested that Option 1 can lay the foundations for a centralised national model at a future stage.

A national model in the future would reduce compliance costs for small health care providers, improve workforce mobility, and ensure consistent safety standards nationwide, ultimately benefiting both care recipients and the businesses that deliver these essential services.

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

In implementing a new approach, if not done appropriately, could result in additional administrative costs for small businesses. A one-size-fits-all system may introduce new reporting, compliance, or software burdens that small businesses have difficulty managing, especially if transition costs are not supported. As a result, government must consider the small business impact and costs through a policy impact assessment to ensure small businesses are not disproportionately burdened.

Small businesses with fewer HR resources may struggle to keep up with complex new requirements, increasing the risk of accidental non-compliance.

To address these risks or unintended consequences, we recommend government consult and engage small businesses directly in system design and transition planning to ensure requirements are practical, and provide clear, tailored guidance and templates. COSBOA is available to support and spearhead any engagement with small businesses when required.

12. What transitional arrangements may be required when implementing a national approach to worker screening? This may include a phased introduction, grandfathering of existing checks until expiry, and/or public education program to clearly outline the changes.

A phased approach to introduction will be necessary to provide small businesses with time to adapt and resolve teething issues before requirements become mandatory for everyone. It is also important for current worker checks to remain valid until scheduled expiry, with clear rules on how workers with existing checks will need to transition.