



Patrons

His Excellency The Honourable Chris Dawson AC APM
Governor of Western Australia
and Mrs Darrilyn Dawson

Volunteering WA

Level 1, 3 Loftus Street
WEST LEEDERVILLE WA 6007



9482 4333



info@volunteeringwa.org.au



volunteeringwa.org.au



ABN: 24028 468 144

**Ms Jenny Wilkinson, Treasury Secretary and;
Mr Matt Yannopoulos Secretary of the Department of Finance**

By email: CareSectorWorkerScreening@finance.gov.au

Dear Ms Wilkinson and Mr Yannopoulos

Proposed National Competition Policy (NCP) Reforms to worker screening to improve labour mobility and efficiency for Care Sector Economy (CSE) workers, while enhancing quality and safety for CSE recipients.

Volunteering WA welcomes the opportunity to provide feedback on your discussion paper.

About Us

Established in 1988, Volunteering WA is the peak body for volunteering in Western Australia. With a membership of 850 Volunteering involving Organisations (VIOs) we work in partnership with community, corporate, educational and government organisations to provide leadership, advancement, and promotion of volunteering to achieve the greatest impact for Western Australia. We represent 1.5 million volunteers in Western Australia of which 742,000 volunteer formally¹. Our diverse membership includes large organisations, a number of whom have a national footprint, medium, and small, volunteer only run organisations. Our members are located across WA including in regional and remote areas and include Aboriginal Controlled Community Organisations.

Our response has been prepared in consultation with our [Expert Reference Group on Volunteer Screening Checks](#) and Sport West, an organisation representing 5,500 sporting clubs and 250,000 volunteers.

¹ <https://www.volunteeringwa.org.au/assets/sovr-state-of-volunteering/wa-state-of-volunteering-report-2023-spreads-2-.pdf>, page 2

Our Recommendations

Your consultation paper provides a succinct overview of the current fragmented and inconsistent approach to screening checks across Australian jurisdictions and the extensive associated costs of the current approach.

A streamlined, national approach to screening checks, will improve protections for vulnerable service users as well as generating significant benefits for volunteers, volunteer involving organisations and the communities they assist.

Recommendation 1 Explicitly recognise and consider volunteers in designing these reforms.

As the largest industry by employment in Australia, Volunteering contributes 2.4% to Australia's Gross Domestic Product². Due to the value and size of the volunteering sector, especially in the CSE, volunteers need to be explicitly recognised and considered in designing these reforms. This is especially important at a time when sectors including the CSE are experiencing high unmet demand for volunteers³.

Recommendation 2 Reforms must include volunteers who require screening checks across all sectors of the economy.

Reforms should not be limited to the CSE but must explicitly recognise and consider the needs of workers, including volunteers, who require screening checks across all sectors of the economy. For example, employees and volunteers in sporting clubs and disaster response.

Recommendation 3 Make screening checks free for volunteers

Worker screening should be provided to volunteers free of charge. This is especially important in the CSE given the importance of volunteers and the critical volunteer shortages in that sector.

Recommendation 4 A risk-proportionate approach should be used to determine when worker screening should apply to volunteers

This requires analysis of the distinct characteristics of volunteer engagement in each sector, balancing the benefits of volunteer involvement with the risks.

Recommendation 5 Establish a tiered screening check system through one national portal

A tiered screening check system is a risk proportionate approach that would allow volunteers and other workers to obtain the relevant level of screening check they require at that point in time. For example, a National Police Clearance Check should be the first-tier clearance option available through the new national portal and would only be able to be used in limited roles. The second tier would include Working with Children Checks as these checks do not currently require screening for fraud related offences. The third tier would be the NDIS and Aged Care screening which is the most comprehensive screening check, and which could be used in any role, in any sector.

² [Snapshot of Volunteering in Australia | Volunteering Gateway](#) page 3

³ <https://www.volunteeringwa.org.au/assets/sovr-state-of-volunteering/wa-state-of-volunteering-report-2023-spreads-2-.pdf>, page 56

Recommendation 6 Provide Digital access through a single “front door” as well as flexible non-digital pathways.

The reforms need to deliver a single front door through MyGov, with alternative entry points for the digitally excluded. These alternative entry points must be co-designed with digitally excluded volunteers and should be appropriately resourced and maintained to ensure accessibility.

Recommendation 7 A fast-track, or interim clearance approach is needed for volunteers.

Addressing delays is vital to avert volunteer drop out during recruitment and onboarding. The Queensland government’s “no card, no start” rule should not be extended nationally. Instead, a fast-track approach is needed. The interim clearance process available under the current NDIS and WWCC approach in Western Australia, should be retained. This enables a volunteer to commence in the role following lodgement of an application, pending the finalisation of the clearance approval process.

Recommendation 8 A national process is needed for exemptions/special consideration

There should be clear nationally aligned criteria and a national, transparent, process for applicants seeking exemptions, appeals and special consideration.

Recommendation 9 Volunteering WA supports the following design principles set out on pages 19-22 of the discussion paper:

- Safety of vulnerable cohorts is paramount
- Regulation should enhance safety at the lowest possible cost (i.e. regulation must be targeted, risk-based and proportionate)
- Checks should be portable across sectors and jurisdictions
- Information about worker screening applicants and check holders should be expanded and shared across jurisdictions
- Reform efforts will need to be aligned
- Cultural safety should be embedded

Recommendation 10 Volunteering WA provides qualified support to the below design principles:

- Worker screening should be continuous and near real-time.
This should not apply in every case, for example National police Clearance Checks will remain a point in time check.
- Existing systems should be integrated and uplifted where possible.
This should be subject to the appropriate additional investment required to implement an effective national approach. Patching different IT systems together could create unintended inefficiencies and costs.

Recommendation 11 Volunteering WA recommends adoption of the following additional design principles:

CSE providers and Volunteer Managers from other sectors need to be able to easily view and access the screening check status of their volunteers e.g. via a dashboard.

Volunteer Managers also need to be able to easily update the database to confirm that a volunteer has commenced or ceased working for them.

A supportive, educative, framework is needed to encourage compliance with the new systems by volunteers and volunteer involving organisations. A penalties-based approach will be less effective and will likely reduce volunteer recruitment and retention.

Discussion of the 2 proposed models for reform.

The consultation paper proposes 2 models to implement a national approach to worker screening in the care and support economy (CSE). Model 1 is an expanded mutual recognition of worker screening checks. Model 2 is a Single national check across the care economy which would be available to be used for those outside the care economy.

Recommendation 12 The long-term goal should be Model 2, a single national screening check

A single national screening check, even it requires more upfront investment is our preferred model. This model is most likely to be consistent and efficient. It will be more effective than the more temporary, “patchwork” solution, proposed in Model 1, where various different existing State and Territory systems need to be aligned and connected into one larger model.

Aligned State and Territory-based reforms will need to take place in the interim, as part of a phased implementation, and must be designed to allow the eventual adoption of Model 2.

Thank you for the opportunity to make this submission on behalf of volunteers and volunteering-involving organisations. We look forward to providing further insights as you refine these proposals. We hope that future consultations provide a longer timeframe, to allow our members, many of whom are entirely volunteer run, to provide meaningful feedback.

Sincerely,



Tina Williams
CEO, Volunteering WA

3 October 2025

Appendix 1 List of Consultation Questions from the Discussion Paper

1. Do these challenges resonate with your experience of worker screening? Are there any other issues that we should consider?
2. What components of the existing worker screening systems work well and should be kept under a national approach?
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?
4. What are the key issues with national consistency in worker screening for the care and support economy? How could these issues be overcome?
5. How can the government ensure safety outcomes are upheld, while improving the simplicity and efficiency of worker screening processes?
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?
7. Are these key design elements comprehensive? What other considerations should be included and why?
8. What synergies and tensions do you see between these elements? How should these be addressed?
9. How should these key design elements be incorporated into a national approach? Which elements will be most important to ensure proper operation and sustainability of the scheme?
10. Do the common design features appropriately and effectively support a national approach to worker screening? Please provide reasons why/why not.
11. Are there additional design features that we should include under both options? d.
12. Which proposed model do you prefer? Please provide reasons why/why not.
13. Are there alternative models which improves efficiency and labour mobility, while enhancing safety and quality? If so, please outline your proposal.
14. What risks, challenges or unintended consequences could arise when implementing a national approach to worker screening? How should we mitigate them?
15. 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.