



**Meals on Wheels<sup>TM</sup>**  
**Australia**

**Department of Health, Disability & Ageing**

**Volunteering in Aged Care Mandatory Training: Consultation Discussion Paper**

**Meals on Wheels Australia Submission**

**12 September 2025**

**Who Are We?**

Meals on Wheels<sup>TM</sup> Australia Ltd (MoWA) is the national peak body representing over 590 individual Meals on Wheels (MoW) outlets that provide meals to around 200,000 older Australians. MoW services represent one of Australia's largest users of voluntary labour, with over 35,000 active volunteers involved in meal delivery and social engagement with older people. The core funding for MoW services comes from the Commonwealth Home Support Program (CHSP) with some services receiving up to one third of their revenue from Home Care Packages (HCP).

Some of our State Association members such as NSW, SA and Victoria have made separate submissions either in writing or via the online form.

**Policy Intent**

MoWA supports the Government's intention to ensure aged care workers, including volunteers, are trained appropriately. This implements the Aged Care Royal Commission recommendation 44 (b) (ii), namely that organisations using volunteers should:

provide induction training to volunteers and regular ongoing training to volunteers in caring for and supporting older people, complaints management and the reporting of reasonably suspected abuse or neglect.

We recognise that this is now a requirement under section 152 of the Aged Care Act (2024), as the definition of an aged care worker includes volunteers.

The discussion paper outlines five proposed volunteer training modules covering:

- Code of Conduct for Aged Care (the Code)
- Serious Incident Response Scheme (SIRS)
- complaints and feedback
- elder abuse awareness and advocacy pathways (*under development*)
- understanding diversity and inclusion (*under development*).

Use of these modules would be compulsory for providers registered in categories 4-6, but is highly recommended for providers in categories 1-3 (which includes MoW services in category 1).

**Issues:****Impact on Volunteer Recruitment and Retention**

The imposition of mandatory training requirements risks impacting on volunteers who do not wish to take the time to complete such training. As the MoW NSW submission says, it is inconsistent with the National Strategy for Volunteering 2023-2033, which says that policy should be aiming to reduce unnecessary compliance burdens.

The reality is that many people volunteer for MoW delivery runs only on an occasional or sometimes irregular basis, yet these people are essential to our ability to provide the much needed service. It will be difficult to engage volunteers in 75 minutes of mandatory training per year when the majority spend less than one hour a month on their voluntary aged care work. MoWA urges the Department to undertake an evaluation of the potential impact of this proposed approach on volunteer numbers.

**Definition of Aged Care Worker**

There is an underlying assumption that every volunteer engaged by a registered aged care provider is an aged care worker. By the definition in the Act, volunteers who have no interaction with older people using funded services, and are not attending sites where individuals using services attend, are not aged care workers. The proposed training topics are meaningless to a person who volunteers as a groundskeeper, courier, fundraiser or is sorting clothes in an op shop. Let's refer to voluntary aged care workers and not simply volunteers.

**Recognition of Existing Training**

MoW services will already have training in place for their volunteers. As employers, there are mandatory WH&S obligations which already form part of their mandatory training. Both MoW NSW and MoW Qld assist their members to provide volunteer training and MoW SA has a comprehensive training strategy in place for their statewide services.

The Department should co-design with volunteers and providers appropriate materials to assist voluntary aged care workers and volunteer-involving registered providers to meet their obligations under the Aged Care Act. Materials should be modifiable to enable insertion or addition of practical matters related to the role/s undertaken by the specific cohort of volunteers, and organisation specific reporting procedures (how and to whom) – much of the material pushed out by the Department is too generic to be useful.

**Costs of Mandatory Training**

The delivery of mandatory training, particularly if it is required annually, will increase costs for MoW services. We acknowledge that resources developed by the Department suitable to volunteer training per category would reduce costs to individual providers. But there will still be a cost to deliver and monitor the training. This should be recognised in future CHSP and Support at Home funding.

**Conclusion**

Volunteers are the foundation of much of aged care in the home delivery. Any mandatory training framework must respect their time, recognise existing systems, and avoid discouraging participation. MoWA urges the Department to adopt a co-designed, flexible,

and proportionate approach to balance safety and compliance with volunteer engagement and sustainability. We support MoW NSW's call for a pilot before the approach is finalised.

*Contact:*

*Paul Sadler, Chair Meals on Wheels Australia.*

*Mob: 0418 208 232*