



# Workforce Audit Readiness Checklist

**For care providers** \_\_\_\_\_

Common mistakes in Disability, Aged Care & Early Childhood services, and what your organisation needs to have in place.

Most organisations aren't as audit ready as they think. Here's why and what to do about it.



↓ Jump to workforce audit readiness checklists ↓

# Context & Scope

Audits across the care sector examine practice quality, consumer outcomes, organisational governance, financial management, complaints handling, clinical care, incident response and more. Compliance audits vary by sector, state and regulator.

## What does this guide cover?

This guide focuses specifically on workforce compliance; who they are, what credentials they hold, reportable conduct, whether your organisation has systems in place to monitor and evidence your workforce effectively.

Workforce compliance is not the only component of care sector audits, but it's a commonly cited area of failure and one that is heavily regulated. This guide represents Oho's understanding of publicly available sector information and data.

### Workforce compliance:

- Worker credential verification (NDIS, WWCC, AHPRA, VEVO, teacher registrations and more)
- Ongoing monitoring
- Scope of your workforce
- Workforce governance and accountability structures
- Incident reporting
- Reportable conduct obligations
- Code of conduct and breach management
- Evidence readiness

DISCLAIMER: this guide is designed to help care organisations navigate the current reform environment and identify areas of workforce compliance risk. It's intended as a practical starting point, not a complete audit framework. It's not legal advice and is not a guarantee of audit readiness. Requirements vary by sector, registration type, state and territory. For full audit preparation, organisations should work with their sector regulatory, legal advisors and compliance specialists.

# Why good organisations still fall short on audits

Care organisations are not struggling to meet compliance obligations because of bad intent.

The real drivers are:

## 1. Increasing obligations

- In the span of three years, care providers across Australia have absorbed more regulatory change than the previous decade combined. 88+ reforms in 2025 alone. New legislation, expanded obligations, increased enforcement powers and strengthened quality standards are creating a compliance environment where even well-resourced, well-intentioned organisations are struggling to keep pace.
- **NDIS Providers:** updated practice standards, new mandatory registration requirements, and more than triple the compliance actions being taken by the NDIS Quality and Safeguards Commission compared to 2021-22.
- **Aged Care Providers:** The Aged Care Act 2024 introduced a stronger rights-based framework, strengthened quality standards, higher governance requirements, and direct liability for board members as 'responsible persons'. From November 2025, worker screening obligation expanded, and incident reporting obligations were strengthened.
- **Early Learning:** National Quality Framework reforms effective from 1 January 2026, updated WWCC compliance & child safety compliance across states including QLD BlueCard changes, South Australia DHS Screening Unit changes, and Victoria's 22 Child Safety recommendations.
- Federal level changes included the announcement of mutual recognition and national continuous checking to reduce gaps between fragmented state systems and enhance the worker suitability information available to employers.

## 2. The visibility gap: three layers - board, CEO, HR

Compliance confidence is often different to compliance reality. The assumption that 'nothing has gone wrong' is not the same as evidence of compliance.

One in 434 workers across the care sector carry a credential failure at any given time (Oho workforce white paper, 2025). At scale, that's not just a theoretical risk.

Visibility and reporting across your workforce are crucial.

## 1. The Board

Boards form an accountability and governance layer for care organisations. **Under the new Aged Care Act 2024, Board members are named as responsible persons with direct compliance obligations and individual liability.** Failure to meet those obligations carries offence provisions that apply to individual, not just the organisation (Aged Care Act 2024). Yet most Boards receive compliance reports that look green, without the specifics that surface real risk. They're not seeing what they need to see and often don't know what questions to ask to get a real picture of compliance. [Check out the checklist for directors →](#)

## 2. CEO & Leadership

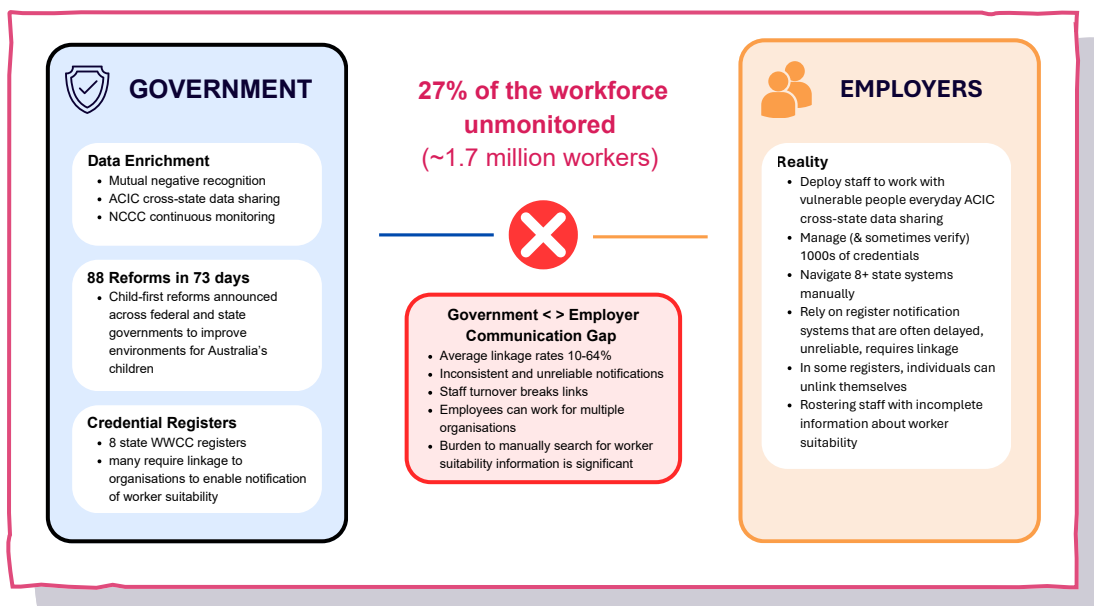
Senior leaders typically see a filtered version of compliance that means not hearing about the **real compliance state until something goes wrong; a complaint, audit or regulator visit.** The problem isn't bad intent; it's the assumption that 'we're compliant' when the more accurate position is 'we think we're compliant'. That gap is where risk exposure lives. [Check out the checklist for CEOs & Leadership →](#)

## 3. HR & Operations

HR & operations teams are closest to the problem, managing workforce suitability across 20+ government registers, with high staff turnover, a dynamic workforce including contractors through agencies, and complex compliance obligations. **The operational load of staying manually compliant creates blind spots** that no spreadsheet can reliably close. [Check out the checklist for HR & Operations teams →](#)

So, the real question is: does anyone actually know if your workforce is actually compliant?

## 27% of the care workforce goes unmonitored



Oho aggregated anonymised data, 2025

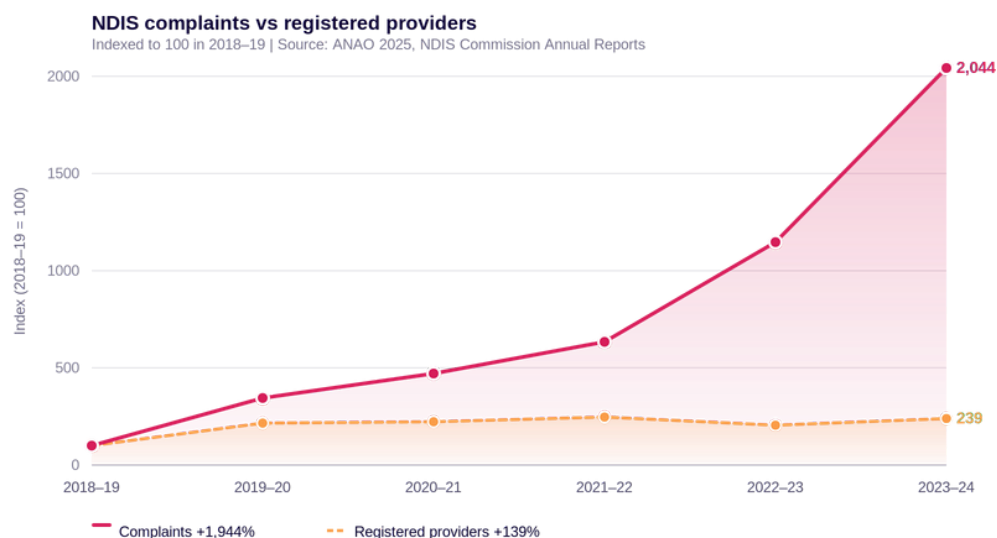
# What regulators are actually finding

Regulatory findings show organisations are working hard to keep up compliance, but the consistent picture for employers is workload pressure and difficulty keeping pace with obligations.

## Disability Service Providers

### 1. Incident reporting: volume, timeliness and culture

NDIS Quality and Safeguards Commission complaints grew from 1,422 in 2018-19 to 29,054 in 2023-24. Compliance actions tripled reaching 35,519 in 2023-24 (NDIS Quality & Safeguards Commission Annual Report, 2025). Complaints grew 1,944% across this time period, while the number of registered providers only grew 139%. Providers can't demonstrate they've implemented plans or escalated breaches. Recurring audit findings also reported that providers raise corrective actions and don't close them, meaning organisations are identifying problems but not necessarily fixing them and closing the loop all the way.



### 2. Workers are only screened at hire, not continuously while they're employed.

Providers are sighting or verifying on hire to ensure day one deployment is compliant, but they're forgetting about ongoing tenure. NDIS providers are still relying on manual spreadsheets to track credentials. Oho data found 1 in 434 workers across the care sector carry a credential failure. This includes suspensions, not found credentials and revocations. It excludes expired credentials (Oho workforce white paper, 2025).

### 3. Governance gaps: complaints systems that don't function

Consistently cited findings from the NDIS Quality and Safeguards Commission includes **inadequate utilisation of complaints management systems or a lack of a system at all** (NDIS Quality & Safeguards Commission Quarterly Performance Reports, 2023-24 & 2024-25). In Q3 2024-25 alone, **6,841 compliance and enforcement activities** were delivered. Do those workers exist in your workforce?

## Aged Care Providers

### 1. Organisational Governance

Quality standard 8, Organisational Governance, has the **lowest compliance rate consistently**. Only 64% of home care providers were fully compliant with all 8 standards (Aged Care Quality & Safety Commission Sector Performance Report, 2025).

### 2. SIRS: underreporting is a real problem

Unreasonable use of force remains the most reported incident type for residential care, and neglect for home care. Neglect has risen 26% since Q1 2023-24. In home care, neglect accounts for 60% of all 1,529 reported incidents. Priority 1 incidents must be reported within 24 hours. Priority 2 within 30 days. **The Commission has flagged that Q4 2024-25's drop in notifications may reflect underreporting rather than genuine reductions** (Aged Care Quality & Safety Commission Sector Performance Report, 2025).

### 3. Expanded workforce screening scope: most providers haven't caught up yet

From November 2025, aged care **worker screening obligations extend to all workers and responsible persons**, including contractors, health professions, kitchen and cleaning staff, admin, and workers employed by a third-party service (Aged Care Act 2024). Meaning providers need to demonstrate all staff are screened effectively. **A single lapsed check that goes unnoticed is a compliance failure identifiable in an audit.**

### 4. Code of conduct: new obligations not operationalised

The new Aged Care Code of Conduct applies to all workers. Providers must have **documented processes for identifying and responding to breaches, and regulators are looking for evidence** that staff understand it, breaches are recorded, and responses are proportionate and timely (Aged Care Act 2024). Most providers have published their code but haven't yet embedded breach management processes or board-level accountability frameworks.



# Early Learning / Childcare Providers

## 1. Working with children checks – expired, unlinked, not verified

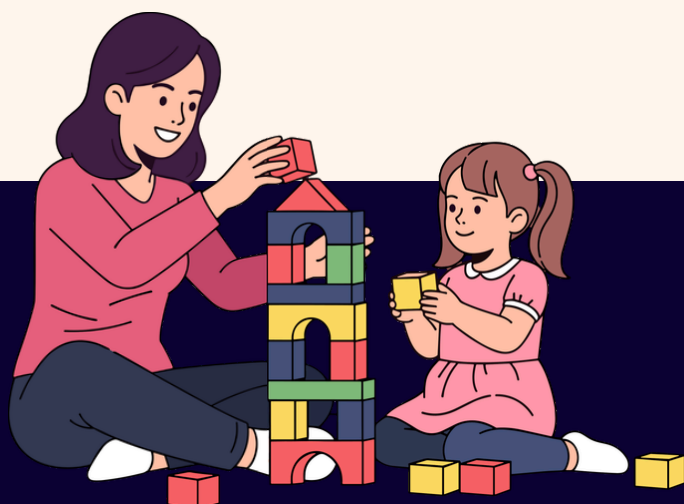
Over 700 missing, expired or unverified WWCCs were identified in NSW childcare sector alone (ABC Four Corners, 2025). Notifications of sexual misconduct allegations from the early learning sector to the NSW Office of the Children's Guardian almost tripled in the reporting period and notifications of sexual offence allegations increased by 47% (NSW OCG Annual report, 2024). New NFQ reforms now require workers to hold a valid WWCC before starting work in childcare and education settings. In NSW, this compliance obligation is being actively enforced with the launch of Operation Sentinel designed specifically to crack down on WWCC non-compliance. In its first five days, 18 fines were issued across the state (NSW OCG, 2026).

## 2. The two top breaches come back to who is in the room

The most breached sections of the National Law in 2024-25 were failure to protect children from harm (27% of all breaches) and inadequate supervision (25%). Together they account for more than half of all confirmed NQF breaches (ACECQA NQF Annual Performance Report, 2025). Workforce makes up an important component and quality and compliance in the context of breaches.

## 3. Child safe governance: operational practice without leadership accountability

Quality Area 7: Governance and Leadership, has the lowest Exceeding rating at just 19% of services, and only 70% of services are rated as Meeting National Quality Standard (ACECQA, 2024). Governance remains a persistent gap across the sector. The national Review of Child Safety Arrangements under the National Quality Framework identified Strengthening child safe governance, leadership and culture as a primary area for improvement, finding that Approved providers do not always understand their responsibilities to create and maintain a child safe culture and environment (ACECQA, 2023). While many services have child safety practices at the operational level, they lack governance-level accountability structure. Many services can demonstrate what their educators do but can't demonstrate that their board or leadership team has accountability for child safety outcomes.



# CHECKLIST

## BOARD DIRECTORS

Questions you (as the board) should be putting to leadership to be confident in your compliance.

- 1 Can leadership tell us (right now – not at the last audit) what percentage of our workforce holds current valid credentials?
- 2 Have we received any regulatory findings, compliance notices or banning orders in the past 12 months? Can we evidence our response? Did we act accordingly on those findings & notices? Do we have evidence of that?
- 3 Do we receive meaningful compliance reporting from the business, not just incident summaries after the fact?
- 4 Are we meeting our direct obligations under relevant legislation? Do all Board members understand their obligations as responsible persons (e.g. within the new Aged Care Act 2024)?
- 5 If we were audited tomorrow, do we know, with confidence, what they would find?

These checklists are created from aggregated information publicly available from regulatory data, governing body guidance and audit findings across the disability, aged care and early childhood sectors. To see all references, visit <https://www.weareoho.com/whitepapers/workforce-audit-readiness-checklist>

# CHECKLIST

## CEO & LEADERSHIP

Your current compliance – ask yourself and your team these questions.

### Workforce Visibility

- 1 Do you know (or can you easily find out) what percentage of your total workforce (including contractors) is compliant and suitable to work right now?
- 2 How much of this workforce is actively monitored (week to week, month to month, quarter to quarter, year to year)?
- 3 If audited tomorrow, could you produce evidence of continuous compliance, not just what was verified at hire?
- 4 Are contractors, agency staff and volunteers included in your compliance oversight, or only directly employed staff?
- 5 Ask your HR leader: can they show you the current real time credential status of your workforce?

### Culture, Reporting & Accountability

- 6 Is your incident reporting culture genuinely open, or is there risk of underreporting? How do reporting behaviours compare across sites or regions? Why?
- 7 Have you mapped your compliance obligations across every state and territory you operate in?
- 8 Do you have a clear ownership and accountability structure for workforce suitability, child safe principles and safeguarding outcomes within your organisation? Are these mapped to the role (not the specific individual in the role) so they outlast job movements?
- 9 Is your board receiving meaningful compliance data, or reports that smooth over real risk and exposure?

## Financial & Risk Awareness

- |    |   |
|----|---|
| 10 | Have you modelled the financial and reputational cost of credential failure in your organisation? Fines, legal exposure, operational disruption?<br>Is your board aware of these costs and impacts? |
| 11 | When did you last review whether your compliance infrastructure/systems are built and set up to keep pace with the recent regulatory changes?   |
| 12 | Confirm registration type (where relevant) and understand your requirements   |
| 13 | Conduct a formal gap analysis against your sector's standards and requirements ahead of an audit to identify the areas of non-compliance.   |
| 14 | Understand the audit process and your requirements end to end (according to relevant governing body and state information). Does your team understand the process?                                  |

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# CHECKLIST

## HR & OPERATIONS

Use these questions to assess your organisation's current compliance posture.

### Worker Credential Verification & Monitoring

- 1 Every worker (permanent, casual, contractor, volunteer) is linked (where possible) and actively monitored and verified, not just sighted on hire. This includes screening requirements for third party / agency staff.
- 2 You have a documented process for what happens when a credential is suspended, revoked or expires mid employment
- 3 You have a reliable process to be notified with sufficient lead time to act on an expiry when a worker credential expires
- 4 You are verifying the right credentials for each role type across each state (NDIS Worker Screening Check, WWCC, VEVO, AHPRA, Aged Care Banning Order, and teacher registrations as applicable)
- 5 You maintain current records of all workers, worker information, role information and credential information
- 6 New starters are not deployed until required credential validation is complete and state legislation is followed where applicable

### Incident Management & Reportable Conduct

- 7 Your incident management process is documented, staff have been trained in it, and correct actions are raised, finalised and closed (not just raised)
- 8 You have a clear, documented process for managing reportable conduct and management is clear on the organisations reportable conduct obligations

9

Your workforce is trained on what constitutes reportable conduct, their obligations as frontline workers, how to engage with the reportable conduct process, and any mandatory timeframes

10

Your complaints management system is actively used, not just documents, and there is evidence of it

11

Mandatory reporting timelines are understood and met across the organisation, including frontline staff (not just management)

12

You have evidence of notifications to participants/families for certain required incidents (in line with NQF, SIRS obligations)

## Code of Conduct & Governance

13

Your workforce has completed any and all mandatory training for your sector and state

14

Training and induction records are current, evidenced and audit-ready, including records showing when each worker was trained, on what and the status of completion

15

You can demonstrate compliance was continuous, not just that you were compliant on the day of your last audit

16

You have a clear, documented process for managing code of conduct breaches (including how they recorded, escalated and resolved)

17

All records are retained in line with your sector and state minimum retention requirements (commonly 7 years) and are accessible for audits at any time

## Risk & Audit Readiness

18

Where agency or contract workers are engaged, you can evidence that quality, safety and compliance obligations are met

19

Your risk register is current and has assigned ownership with specific roles accountable for risks and responses are documented

20

A formal gap analysis (against your sector & state legislation, and quality standards) has been completed in the last 12 months

21

A formal gap analysis (against your sector & state legislation, and quality standards) has been completed in the last 12 months

22

Your policies and procedures are current and reflect the most recent regulatory changes in your sector

23

Your frontline staff understand what an audit involves and what auditors may ask them, including incident reporting and code of conduct obligations

24

Participants and families (or representatives) have been informed that an audit may occur, understand their rights in relation to the audit, and understand they could be observed and interviewed during the process (sector/regulator dependent)

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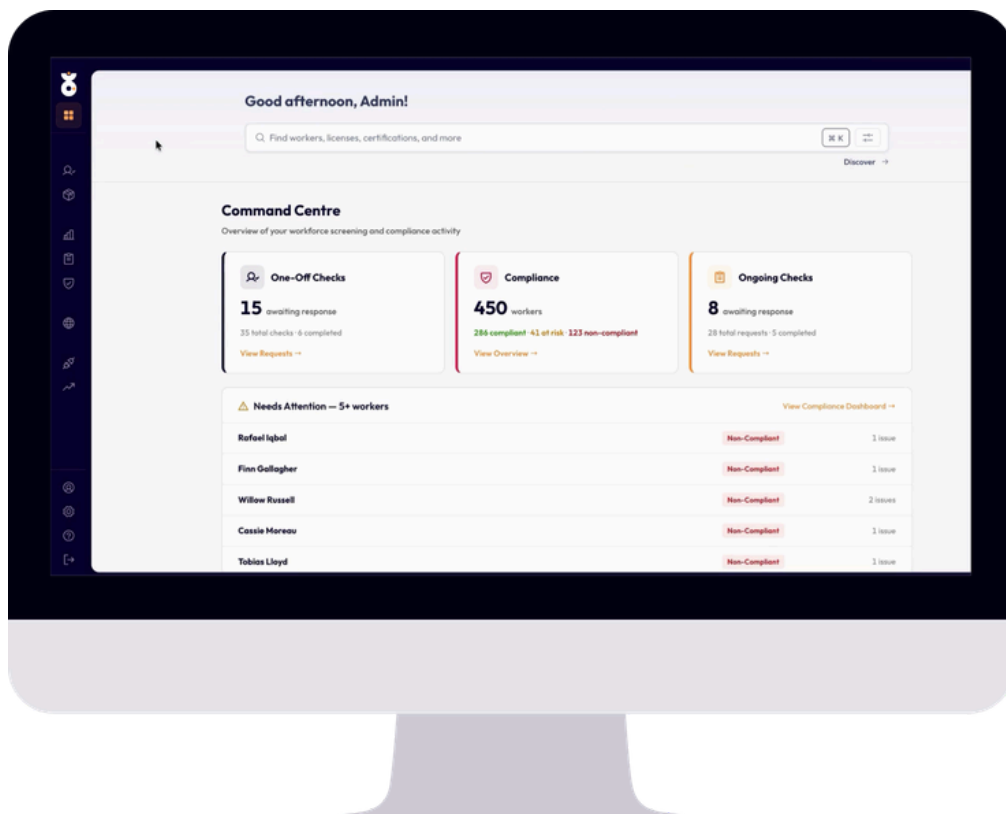
# Want some more info on continuous worker screening?

Oho is purpose-built for this, **continuously monitoring your entire workforce across live government registers**. When a credential lapses or its status changes (revoked, barred, cancelled etc.), you'll be notified so you can **act quickly to safeguard your people**.

We work with 145+ care organisations across disability, aged care and early childhood, monitoring 224,000 workers nationally.

Ready to close the gap?

Get in touch



## How this guide was developed

The findings, sector intelligence and checklist items in this guide draw from publicly available regulatory data and information from the following primary sources:

- **NDIS Commission** – Annual reports, Quality Compliance and Enforcement Reports, Provider Audit findings, NDIS Practice Standards and Quality Indicators, NDIS Provider Registration and Practice Standards
- **Aged Care Quality and Safety Commission** – Quarterly Performance Reports, Serious Incident Response Scheme (SIRS) data, Sector Performance Data, Provider Governance Obligations
- **Australian Children’s Education and Care Quality Authority** – National Quality Framework compliance data, National Quality Standards,
- **State regulators & child safe frameworks** – State Reportable Conduct Schemes, NSW OCG, State Department of Educations,
- **Aged Care Act 2024** – rights-based framework, provider registration and worker screening obligations
- **National Quality Framework (NQF)** - including reforms effective from 1 January 2026
- **National Principles for Child Safe Organisations** – recommendations from the Royal Commission into Institutional Responses to Child Sexual Abuse
- **Oho Workforce intelligence** – anonymised, aggregated credential and compliance data from 140+ care organisations and 224,000 care workers
- Input from safeguarding, legal and workforce compliance experts

### IMPORTANT TO NOTE:

This guide has been produced by Oho for general information and educational purposes only. It is intended to provide care organisations with a practical starting point for understanding workforce compliance obligations in the context of regulatory reform and audits across the disability, aged care and early childhood sectors in Australia.

This guide does not constitute legal advice, official compliance advice, regulatory advice or any other form of professional advice. It does not represent a comprehensive or complete audit framework. Compliance requirements vary by state, sector, registration type, and change over time as legislation and regulatory requirements evolve.

This guide reflects Oho’s understanding of publicly available data and sector intelligence at the date of publication (April 2026). Organisations should seek independent legal, compliance and regulatory advice specific to their circumstances.

For a full set of sources, visit: <https://www.weareoho.com/whitepapers/workforce-audit-readiness-checklist>