

# EVALUATION OF PACIFIC AUSTRALIA LABOUR MOBILITY SCHEME AGED CARE EXPANSION PROGRAM

END OF PROGRAM EVALUATION REPORT

14 March 2025

## Acknowledgements

Clear Horizon wishes to thank the participants in the evaluation for their time and insights especially:

- the 39 PALM ACE workers who were willing to share their Certificate III training experiences with us.
- Labour Sending Unit Directors
- In-country stakeholders in Kiribati and Fiji
- the PALM Scheme ACE Employers and Registered Training Organisations in ACE 2023 and 2024 for allowing us to participate in their regular meetings with the ACE Team, and for sharing their reflections about their ACE program experience with us.

## Disclaimer

This report contains findings and recommendations from Clear Horizon's evaluation of the Aged Care Expansion (ACE) program, completed with information supplied to Clear Horizon by the Department of Foreign Affairs and Trade and the Pacific Labour Facility (PLF). While Clear Horizon make every effort to ensure the accuracy of information, any judgements as to suitability of the information for the client's purposes are the client's responsibility. Clear Horizon extends no warranties and assumes no responsibility as to the suitability of this information or for the consequences of its use.

---

# EVALUATION FINDINGS

The Pacific Australia Labour Mobility (PALM) scheme Aged Care Expansion (ACE) program has been evaluated by Clear Horizon as **effective**, with high employer satisfaction regarding workers' skills and performance, as well as a strong initial completion rate for Certificate III qualifications. The program's efficiency was assessed as **consolidating**, with streamlined processes and responsive support, though delays in worker mobilisation to Australia have posed some challenges. Regarding **scalability**, the program was assessed as **consolidating**, with PALM sending countries maintaining sustainable targets for workforce growth in aged care.

The ACE program Evaluation Rubric, which details the justification criteria used for the assessment levels, is included at **Annex A**.

## Purpose of this report

This report contains findings and recommendations from the independent evaluation, conducted by Clear Horizon, of the ACE program managed by the Pacific Labour Facility (PLF)<sup>1</sup> on behalf of the Department of Foreign Affairs and Trade (DFAT).

The purpose of the evaluation was to assess:

- the effectiveness and efficiency of the ACE program to increase the number of Certificate III qualified PALM aged care workers, and
- the scalability of the ACE program for PALM sending countries.

The evaluation will inform decisions about future PALM skills investments including in aged care.

This report describes the findings of virtual interviews with 39 ACE workers conducted in-language; consultations with senior labour mobility officials from eight of the 10 PALM sending countries<sup>2</sup>; and interviews with five ACE 2024 PALM scheme employers and Registered Training Organisations (RTOs).

The report provides evaluative assessments of the ACE program based on three criteria – effectiveness, efficiency and scalability.

Implications of the findings and recommendations for future PALM aged care skills initiatives and other skills investments are presented.

## ACE program

The ACE program supports new PALM aged care workers to complete the Certificate III in Individual Support (Ageing), which was recommended by the Australian Royal Commission into Aged Care Quality and Safety as an employment requirement for aged care personal care assistants. The Certificate III consists of 15 units of competency and 120 hours of supervised work placement in an aged care facility.

The ACE program aims to demonstrate scalable approaches to Certificate-level training that works well for PALM scheme employers, PALM sending countries, and PALM scheme workers employed as personal care assistants in Australia's aged care sector.

---

<sup>1</sup> On 31 December 2024, the PLF closed out operations to make way for the Pacific Labour Mobility Support Program that now supports DFAT to make the PALM scheme.

<sup>2</sup> LSU officials from Vanuatu and Nauru were unavailable for interview during the evaluation period.

The PLF (now PLMSP) ACE team's role is to procure, support and provide oversight of the nine ACE 2023 and five ACE 2024 PALM scheme employers to ensure progress towards the contracted number of trained ACE workers by 30 September 2024 for ACE 2023, and June 2025 for ACE 2024.<sup>3</sup>

As at 1 February 2025:

- six-hundred and fifty-nine PALM scheme workers have graduated with their Certificate III in Individual Support (Ageing) through the ACE program
- all PALM sending countries have participated
- eleven PALM scheme employers have participated.

## Key findings

### PALM scheme ACE workers' training experiences and perspectives

PALM scheme ACE workers were asked about what helped them in their study. They stressed the importance of experiential learning to understand the learning context and provide hands-on practice. They preferred face-to-face interaction with their trainers rather than virtual tutorials and appreciated having regular rostered (paid) study days.

The most frequent barrier identified was workers not understanding the meaning of some aged care technical/clinical terms, especially problematic when terms have no equivalent in the workers' language. The lack of digital skills required for online learning and assessment also proved difficult for some workers who have had to rely on their classmates for help. Not having a smart phone or laptop required for online learning and assessment required workers to share their classmates' phones and laptops. Workers also raised concerns about the cost of data for online learning, costs associated with public transport to in-country learning venues and individualised learning support being limited by tutor/class size. Workers living in rural locations said their trainers did not visit them as frequently as they needed and did not spend much time with them during visits. These workers also describe the quality of internet in their workplace and accommodation as being inadequate for streaming online study materials and completing online assessments.

When asked which training arrangement they prefer – onshore (in Australia), in-country or blended (a combination of onshore and in-country) – most ACE workers surveyed noted their preference for onshore training because:

1. they are paid while studying, and
2. they can focus on their studies rather than being distracted by family responsibilities.

Almost all the ACE workers surveyed expressed interest in undertaking further training when they have completed the Certificate III and/or on their return home. The most common aspiration is to become a registered nurse (noting this falls outside the remit of the PALM scheme). Other areas of interest are the Certificate IV in aged care; community health care; mental health; and caring for people with a disability.

---

<sup>3</sup> Following extensions made to both programs for several PALM scheme employers requiring additional time for completion of training. A small cohort of PALM scheme workers in ACE 2024 will complete their training by December 2025.

## PALM sending countries' perspectives and aspirations

Labour Sending Unit (LSU) staff felt well-supported by the ACE team and had the information required to assist PALM scheme employers with worker recruitment and mobilisations. However, officials highlighted the tight timeframe for ACE mobilisations (the consequence of ACE funding deadlines) as an issue, placing LSU staff under added pressure in an already high-pressure environment. LSUs have indicated that aligning ACE mobilisations with standard PALM processing times (generally 5-6 weeks), with consistent processing timeframes across all mobilisations, would help ensure smoother operations and manage workloads. LSU officials emphasised the importance of regular communication between PALM scheme employers and LSU staff. This is especially critical when there are mobilisation delays and LSU staff are contacted by workers seeking information.

The ACE program has raised expectations of future demand for PALM aged care workers in Australia. Most LSUs have set provisional annual targets for PALM aged care worker numbers and many sending countries are developing aged care pathways including building a pipeline of workers for PALM aged care roles. Given these efforts, LSUs have expressed interest in clearer guidance on potential future ACE funding and training spaces to assist with workforce planning.

The level of staffing and resources in LSUs was seen as sufficient. LSUs highlighted that PLF surge support was critical for this. Without it, they could not manage PALM numbers including in aged care. LSU officials reported that if aged care numbers continue to rise (alongside PALM numbers more broadly), they would need additional resourcing including staff, resources and infrastructure (e.g. bigger office space) in future.

Concerns about “brain drain” due to the PALM scheme were reported by officials from most sending countries during consultations; however, these were found to be unwarranted or lacking evidence. Most sending countries actively ensure qualified nurses are not recruited for PALM aged care employment.<sup>4</sup>

## PALM scheme employer perspectives

There has been consistently positive feedback from PALM scheme employers about ACE workers' performance in the workplace, especially regarding their caring interactions with residents.

---

*The staff we have recruited from Kiribati have been kind, caring, adaptable and a positive influence in our workplace and local communities. - PALM employer of I-Kiribati ACE workers*

*After putting in significant work to overcome their LLN challenges, they have adjusted well and are more than suited personality-wise to the role of carer. They have shown themselves to be hard working. - PALM employer of Timor-Leste ACE workers*

*The facilities appreciate the workers' dedication and resident-focused approach. Facilities express interest in hiring more PALM workers in the future due to their reliability and positive contributions. - PALM employer of Fijian ACE workers*

*Their work ethic is admirable and their desire to go above and beyond for our residents is clear. - PALM employer of Ni-Vanuatu ACE workers*

---

<sup>4</sup> PALM scheme employers participating in the ACE program were advised to work collaboratively with LSUs to avoid recruitment of current and former health care workers and required to agree in their ACE application to avoid these recruitments unless given clearance to do so by the LSU.



## ACE program achievements

The ACE program was implemented in a timely manner during a period of significant change to the Australian aged care sector and the PALM scheme.<sup>5</sup> While some of the external changes are not directly related to the ACE program, they created a dynamic operating context with associated challenges for the ACE Team, PALM scheme employers and RTOs.

The ACE program provided opportunities for more women to gain PALM employment and a qualification (as at February 2025, 90 per cent of ACE workers were women). Some Pacific cultures have traditional gender norms for women which preclude hard physical work that is typical in the PALM short-term stream and New Zealand's Recognised Season Employer scheme.

The program is equipping women with formally recognised, immediately transferable skills for work in formal and informal roles on their return home, not only in aged care but also in other health roles involving related skills such as community care.

Building on the two training pathways used in the Samoa-NT<sup>6</sup> and APTC Aged Care pilots<sup>7</sup>, the ACE program has developed an expanded range of pathways for PALM workers to achieve an Australian aged care qualification. The program has provided important insights into the factors across the worker journey that contribute to study success and achievement of Australian qualifications by new PALM workers. This is useful information for ensuring the success of new PALM skill investments involving an Australian Qualifications Framework (AQF) qualification.

Further, the program has demonstrated to the aged care sector and other sectors operating in a regulatory environment how the PALM scheme can meet their labour needs and support the training of AQF qualified workers. The ACE program is also contributing to the goal of PALM sending countries to strengthen skills development in the labour mobility cycle to ensure net skills gains.

## Evaluative assessments

### Effectiveness

Based on the two agreed dimensions of effectiveness, the ACE program was assessed as **effective**<sup>8</sup>. Overall, there has been a consistently high level of PALM scheme employer satisfaction of workers' skill level and work performance in ACE 2023 and 2024. Workers are valued for their caring interactions with residents and the positive impact their cheerful demeanour is having on the workplace. Further, 97.5 per cent of the ACE 2023 cohort attained their Certificate III qualification (the figure for ACE 2024 is not yet available).

### Efficiency

Based on the two agreed dimensions of efficiency, the ACE program was assessed as **consolidating**.

---

<sup>5</sup> For example, the introduction of the Aged Care Industry Labour Agreement to the Australian aged care landscape and the transition of PALM domestic operational responsibilities from the Pacific Labour Facility to the Department of Employment and Workplace Relations.

<sup>6</sup> [www.palmscheme.gov.au/research/aptc-aged-care-plus-pilot-evaluation-findings-may-2023](http://www.palmscheme.gov.au/research/aptc-aged-care-plus-pilot-evaluation-findings-may-2023).

<sup>7</sup> [www.palmscheme.gov.au/research/aptc-aged-care-plus-pilot-evaluation-findings-may-2023](http://www.palmscheme.gov.au/research/aptc-aged-care-plus-pilot-evaluation-findings-may-2023).

<sup>8</sup> The ACE program Evaluation Rubric, which details the justification criteria used for the assessment levels, is included in **Annex A**.

Program arrangements have been streamlined where necessary (e.g. ACE approval process for PALM scheme employers) and timely support and/or responses to issues raised by PALM scheme employers have been provided.

There have been risks to the timely use of ACE funding due to delays by three of the five ACE 2024 PALM scheme employers in mobilising workers after completion of their in-country training. Delays in mobilising workers after in-country training have caused challenges for some PALM workers and sending countries, particularly where there was an expectation workers would leave for Australia shortly after completing their course.

## Scalability

The definition of scalability used in the evaluation is focused on supply. The definition was written when there was a high demand for PALM aged care workers in Australia and the concern was the extent to which this demand could be met by sending countries.

The scalability of the ACE program for sending countries was assessed as **consolidating**. As noted above, most sending countries have targets for growth in PALM aged care worker numbers, which are deemed to be sustainable for families and communities.

The PALM scheme is a demand-driven program, which also underpins the allocation of ACE funding to sending countries. This funding allocation approach highlights an opportunity to explore a balance between employer demand and sending country participation goals. This is illustrated by the fact that only three countries participated in both ACE 2023 and ACE 2024 (Fiji, Kiribati, and Tonga).

The recent appearance of a softening of demand for PALM aged care workers, which appears to have started around mid-2024, highlights a limitation of the supply-side definition used in the evaluation. Further market analysis is needed. The growth of a future PALM care skilling program will also be dependent on ongoing employer demand for PALM scheme aged care workers, including noting the new Aged Care Industry Labour Agreement<sup>9</sup>.

## Implications of the findings for future PALM skills investments including in aged care

At the time of writing there is limited information about what form skills investments (including aged care) will take under the Pacific Labour Mobility Support Program (PLMSP). There are also unknowns about the larger context within which PLMSP skills investments will be situated as DFAT's develops a PALM Skills Strategy.

## Balancing demand and supply

The ACE program is navigating changes in demand for PALM aged care personal assistants, which were less evident when the program began 18 months ago. *On the demand side, there appears to have been a recent softening for PALM aged care workers.* On the supply side, sending countries' expectations of participation in the ACE program have been raised and many countries are taking active steps to create a pipeline of PALM aged care candidates.

---

<sup>9</sup> The Aged Care Industry Labour Agreement is designed to help Australian aged care providers address workforce shortages by streamlining the recruitment of qualified direct care workers from overseas. Further information is available on the Department of Home Affairs website: <https://immi.homeaffairs.gov.au/what-we-do/skilled-migration-program/recent-changes/new-aged-care-industry-labour-agreement>.

The challenges for the ACE program going forward are to:

- a. *define a feasible level of scale for a future PALM care skilling program (in terms of worker numbers) in the short and longer-terms, based on PALM aged care market analysis*
- b. *identify the optimal balance between PALM scheme employer and sending country interests that fosters demand while managing sending countries' expectations of PALM aged care participation.*

## **Funding allocation method**

The current approach to determining worker numbers for each sending country is based on employer demand. We suggest a revised funding allocation method is developed that creates a more intentional balance between PALM scheme employer demand and sending country participation aspirations. For example, a hybrid funding allocation method could consist of an employer-led component (as is currently the case), together with a component that allows for “calibrating” individual sending country aspirations with demand. The percentage amounts allocated to each component would need to be determined.

## **ACE program improvements**

The findings show there are improvements that can be made to the ACE program in the short-term, which are summarised in the following recommendations. Some of these improvements may be relevant for consideration in designing future skills investments.



---

# RECOMMENDATIONS

## ACE program - policy

1. Given PALM sending countries' aspirations about future PALM aged care employment opportunities, a decision about multi-year funding is made as soon as possible to avoid PALM scheme employer/RTO attrition and provide assurance to sending countries.
2. Work is undertaken to understand Australian aged care providers' anticipated demand for PALM scheme workers to inform decisions about what is a feasible scale for a future PALM care skilling program (in terms of worker numbers) in the short and longer-terms.
3. The optimal balance between PALM scheme employer demand and sending country interests is defined, which fosters demand while managing sending countries' expectations of PALM aged care participation in line with their broader social and economic development ambitions.
4. A funding allocation method is developed that addresses both PALM scheme employer demand and sending country participation aspirations.

## ACE program - operational

5. A design document (which includes an intervention logic) is developed for a new PALM care skilling program and all other skills investment projects. The document could be based on a template for skills investment designs which would assist cross-investment comparison. The template includes a M&E Framework.
6. The deadlines for training completion for a new PALM care skilling program and other skills investments involving AQF qualifications:
  - are aligned with the Australian Skills Quality Authority's guidelines for the volume of learning for qualification completion, not DFAT funding cycles
  - account for LSUs' standard PALM mobilisation processing times (generally 5 - 6 weeks from submission of Recruitment Plan) to avoid PALM scheme employers having to recruit and mobilise workers quickly, placing pressure on LSUs, workers and their families.
7. To mitigate the risk of a PALM scheme employer's job placement failing to eventuate in a timely manner (as has occurred with three of the five ACE 2024 PALM scheme employers), a two-tier system for allocating ACE worker numbers to PALM scheme employers is implemented:
  - PALM scheme employers s, both labour hire and direct employers, who are new to the ACE program, the aged care sector and/or the PALM scheme, are initially allocated a smaller number of workers until they demonstrate capacity to mobilise placements efficiently
  - labour hire and direct PALM scheme employers who are aged care industry specialists and have a track record in PALM are allocated the worker numbers they request (within caps under the PALM Approved Employer Deed and Guidelines, and subject to decisions of LSUs).
8. There is greater accountability for PALM scheme employers to make timely use of aged care skilling funding by mobilising workers within a reasonable period, for example:

- a clause is included in the ACE Subcontractor Agreement stating the expectation that workers will be mobilised within a reasonable time (e.g. two months) after recruitment/completion of training, unless unanticipated delays occur (e.g. LSU-related reasons; flight delays). If workers are not mobilised by a specified number of weeks after completion of in-country study, other PALM scheme employers will be invited to recruit from the worker cohort
- in the case of mobilisation delays (other than LSU-related reasons; flight delays), PALM scheme employers are requested to pay workers a stipend after a defined period at their own cost (not a cost to the program). This will help to lessen financial hardship for workers caused by the delay, especially for those who left paid employment to undertake an in-country course
- PALM scheme ACE employers maintain regular communication with LSU staff, especially regarding any specific requirements for recruitment and mobilisation; and potential/actual delays in worker mobilisation so this information can be communicated to workers and their expectations managed.

9. LSUs ensure:

- aged care candidates in the work ready pool have the digital skills required for online study and assessment
- people considering becoming an aged care candidate are made aware there may be a delay in leaving for Australia following selection by a PALM scheme employer.

10. DFAT consults the Samoan Government to determine its interest in leading a Skills Transfer Pilot for workers from the NT-Samoa Pilot Aged Care pilot (who are due to return home in September 2025) to integrate returning workers' skills into Samoa's health system and to identify opportunities (paid and unpaid) for returned workers to use their skills in their communities.

## ACE worker qualification success

11. New ACE PALM scheme employers are encouraged to put arrangements in place that have been shown to contribute to worker study success, such as access to a laptop for study and assessment; regular rostered (paid) study days; daytime (not night-time) shifts and limits on the amount of overtime worked.
12. PALM scheme employers/RTOs undertaking in-country training are informed about worker feedback from the evaluation interviews, especially about individualised learning support being limited by tutor/class size; financial support for transport costs and for students to buy expensive internet data for online learning.

## Other recommendations for future skills investments

13. More preparation of LSUs for new skills investments especially in sectors about which LSU staff may be unfamiliar as was the case with aged care (other than Fiji, no other sending country has a formal aged care sector). This could include visits to PALM workplaces to better understand the workplace environment, the nature of the work, and PALM scheme employer's requirements for worker recruitment.
14. Ensure alignment with:
- skills investment initiatives by other agencies, such as the World Bank's work on TVET in Tonga, and the New Zealand Qualifications Authority's multi-year project on qualification recognition
  - work being done on reintegration such as DFAT's partnership with the International Organisation for Migration and the Pacer Plus Implementation Unit's reintegration project to begin in 2025.

---

# ANNEX A

## ACE program evaluation rubric

Evaluation rubrics (“rubric”) are a tool used by evaluators to ensure that their evaluative assessments are transparent. A rubric defines the agreed criteria against which a program/policy will be evaluated and articulates what each criterion “looks like” at an expected level of performance, higher, and lower levels of performance.

Three criteria – effectiveness, efficiency, and scalability – were proposed to evaluate the ACE program, defined as follows.

### Effectiveness

There are two dimensions to effectiveness, both of which must be present for the criterion to be met:

- the PALM scheme employer is satisfied with the skill level and work performance of the workers
- the training and learning support arrangements meet the needs of the workers, resulting in 95 percent of workers who arrived in Australia achieving the Certificate III in Individual Support (Ageing) over the over the duration of the ACE program.<sup>10</sup>

### Efficiency

There are dimensions to efficiency,<sup>11</sup> both of which must be present for the criterion to be met:

- ACE arrangements and processes are timely, enabling the worker to be recruited, mobilised, trained and assessed in the shortest time needed for qualification completion
- ACE arrangements and processes make optimal use of resources, avoiding duplication and disproportionate transaction costs.

### Scalability

- The supply of workers to Australia to work in the aged care sector is sustainable for sending country families, communities, and LSUs.

The evaluation rubric is shown in Table 1.

---

<sup>10</sup> The 95 per cent target was the qualification completion rate for the workers in the Samoa-NT and APTC Aged Care Pilots.

<sup>11</sup> This definition is informed by DFAT’s Value for Money Principles and Annual Investment Monitoring Report Ratings Matrix.

**Table 1. Evaluation rubric**

Performance levels	Criteria		
	Effectiveness	Efficiency	Scalability
<b>Very effective</b>	The ACE program demonstrates very good to excellent performance. No areas for improvement/enhancement can be identified.	The ACE program arrangements are making maximum use of time and resources. No areas for improvement/enhancement can be identified.	There are no limitations for sending countries for the ACE program to operate at scale.
<b>Effective</b>	The ACE program arrangements work very well. A few areas for improvement/enhancement are identified but these areas are not of any real consequence.	The ACE program arrangements are making good use of time and resources. A few areas for improvement/enhancement are identified but these areas are not of any real consequence.	The scalability of the ACE program is feasible for sending countries in its current form, providing ongoing monitoring is in place to manage adverse impacts of growth in worker numbers.
<b>Consolidating</b>	The ACE program arrangements work well. There are some areas requiring improvement/enhancement which can be addressed with reasonable effort and minimal investment.	The ACE program arrangements are making adequate use of time and resources. There are some areas requiring improvement/enhancement which can be addressed with reasonable effort and minimal investment.	There are current limitations to the scalability of the ACE program for sending countries that need attention.
<b>Marginal</b>	Aspects of the ACE program are not working. The areas requiring improvement/enhancement require significant effort and/or investment to address.	The ACE program arrangements are making less than adequate use of time and resources. The areas requiring improvement/enhancement require significant effort and/or investment to address.	The scalability of the ACE program is not possible for sending countries without significant redesign.
<b>Deficient</b>	The ACE program has serious shortcomings.	The ACE program has serious efficiency shortcomings.	The ACE program is not scalable for sending countries.