



Submission to the Productivity Commission Inquiry into non-financial business reporting requirements

September 2026

Introduction to halo

Halo is a community based not for profit provider delivering aged care and disability services. As a provider operating across both sectors, halo is subject to a broad range of non-financial reporting requirements administered by multiple regulators.

Halo supports strong accountability, quality standards, safeguarding requirements and effective regulation. We recognise the important role that reporting plays in maintaining public confidence, supporting oversight and improving service quality.

The cumulative effect of reporting requirements across aged care, disability, workforce, quality and safeguarding regimes however has created a substantial administrative burden. In our experience, opportunities exist to achieve the objectives of reporting more efficiently through greater harmonisation, reduced duplication and improved sharing of information between government agencies.

Response to information request 4: other non-financial reporting requirements

Halo believes consideration should be given to reporting requirements applying to providers operating within the aged care and disability sectors, particularly organisations delivering services across both sectors. We have highlighted below the predominant areas of concern:

Main compliance costs

The costs associated with reporting extend far beyond the preparation and submission of reports. To meet reporting obligations halo has had to invest significant resources in:

- Collecting and validating data;
- Maintaining reporting systems and records;
- Interpreting regulatory requirements;
- Responding to ongoing regulatory changes;
- Updating policies and procedures;
- Training staff;
- Conducting internal quality assurance activities;
- Preparing governance and board reporting;
- Responding to regulator requests and audits.

Many of these costs are ongoing and increase when reporting requirements change or when similar information is required by multiple agencies in different formats.

For community-based not for profit organisations like halo, these activities divert resources away from frontline delivery, workforce development and client outcomes.

Duplication and inefficiency

Providers operating across aged care and disability services frequently collect similar information for different purposes and submit related information to multiple regulators.

Examples include reporting relating to:

- Incidents and complaints;
- Workforce information;
- Quality and compliance activities;
- Governance arrangements;
- Client outcomes;
- Service delivery performance.

While the objectives of these reporting requirements are often similar, differences in definitions, formats, reporting systems and reporting schedules create additional administrative burden. The result is that information must often be extracted, reformatted, validated and submitted multiple times rather than collected once and reused across government systems.

Perhaps the most frustrating of all is the regulatory portals, such as the Government Provider Management System (GPMS), Provider Digital Access (Proda), Relationship Authorisation Manager (RAM), My Aged Care (MAC), Health Data Portal, My NDIS Provider Portal and NDIS Quality and Safeguards Commission Portal.

These portals are required to lodge information about the organisation's personnel, employee access levels, associated providers, registration and audit requirements, worker screening, reportable incidents, quarterly financial reporting, annual financial reports, client referrals and requests, child safety reporting, operational reporting, pricing information, service information and claims or payment related information.

These portals are extremely complicated to use and highly ineffective because they often do not link to one another, requiring the same information to be entered repeatedly. When staff leave the organisation, it can be difficult to establish or transfer access, often involving lengthy phone calls, unclear instructions and delays that affect the organisation's ability to maintain accurate portal records. Additional duplication also arises because each portal has different access controls, terminology, reporting formats and support processes, which increases administrative effort and creates unnecessary risk where information must be updated separately across multiple systems.

Response to information request 5: significant interactions between reporting requirements

Halo considers the cumulative impact of reporting requirements to be one of the most significant regulatory challenges. We have outlined below the predominant concerns:

Similar information reported to different bodies

One of the most burdensome interactions occurs where similar information must be maintained and reported across different regulatory frameworks.

Examples include:

- Workforce-related information;
- Quality and risk information;
- Complaints management data;
- Incident management data;
- Governance and organisational information.

Although information may relate to the same organisational activities, differing reporting requirements frequently require separate administration, review and submission processes.

Inconsistent definitions and data requirements

Even where reporting objectives are similar, regulators frequently apply different definitions, classifications and evidence requirements. This reduces the opportunities for automation and data sharing and increases manual processing requirements. The absence of common standards means providers must devote resources to translating information between different regulatory frameworks rather than focusing on service improvement.

Simultaneous regulatory change

This is a significant issue for halo. In recent years we have been required to respond to multiple reform programs across aged care and disability services simultaneously.

The burden associated with these reforms extends beyond reporting itself and includes:

- Analysing and monitoring legislative changes;
- Redesigning compliance frameworks;
- Upgrading systems;
- Updating policies and procedures;
- Staff training and communication;
- Monitoring implementation;
- Revising governance arrangements.

Where new reporting obligations are introduced before previous reforms are fully embedded, the impact is compounded and organisational efficiency is reduced.

Reform fatigue and change saturation

The pace and frequency of regulatory change has contributed to significant reform fatigue across halo. We are required to implement new reporting requirements while still adapting to previous reforms and regulatory compliance. Continuous change creates pressure on frontline teams, management and governance structures and can reduce organisational capacity to focus on innovation and service improvement.

Periods of regulatory stability are important for us to fully implement the reform, realise intended benefits and maintain service quality.

Response to information request 6: reducing reporting burdens and improving efficiency

Halo believes significant opportunities exist to reduce reporting costs while maintaining transparency, accountability and regulatory oversight. We believe adopting the following could be very beneficial to us and others in our situation:

- Adopt a 'tell us once' approach

Government agencies should seek to eliminate duplicate reporting by allowing information submitted to one regulator to be securely shared and reused by others where legislative requirements and privacy considerations permit. This would reduce the administrative burden without compromising on regulatory oversight.

- Harmonise reporting definitions

Common definitions, classifications and reporting standards should be adopted wherever possible across aged care and disability reporting frameworks and legislated regulations such as "rules".

This would improve consistency, reduce duplication and support greater automation of reporting processes.

- Develop shared reporting platforms

It would be of benefit for the Government to investigate common reporting platforms that allow halo to submit information once for use across multiple regulatory functions.

The use of common platforms would significantly reduce the burden associated with maintaining multiple reporting systems.

- Improve reform coordination

Reporting obligations should be assessed not only individually but also for their cumulative impact.



Before introducing additional reporting requirements, governments should undertake formal assessments of:

- Cumulative reporting burden
 - Implementation costs
 - Systems impacts
 - Workforce impacts
 - Change-management requirements
- Provide greater regulatory stability

Major reforms should be followed by sufficient implementation and stabilisation periods before additional reporting obligations are introduced.

This would allow halo to properly embed and maximise the benefits of investments already made in systems, processes and workforce capability.

Productivity impact

Halo has spent a significant portion of organisational resources devoted to meeting reporting, compliance and reform implementation requirements associated with aged care and disability regulation.

These activities include governance oversight, policy reviews, workforce training and communications, data management, reporting processes, compliance activities and systems changes.

To quantify the impact on productivity, over the past 12 months alone halo estimates that implementing Aged Care and NDIS reforms has required approximately 4,374 hours from the Board and Leadership Team, representing an organisational cost of approximately \$279,964. This does not include the significant additional time contributed by other employees and is therefore a conservative estimate of the true cost. These costs are not reimbursed or otherwise funded and must be absorbed by halo in addition to maintaining business as usual operations.

Conclusion

Halo supports effective regulation, accountability and quality safeguards however the cumulative burden of non-financial reporting requirements across the aged care and disability sectors is significant and continues to increase.

Better alignment of reporting frameworks, greater sharing of information between regulators and a stronger focus on reducing duplication would allow providers to direct more resources towards improving outcomes for older Australians, people with disability and their families while maintaining appropriate oversight and accountability.



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22 September 2026