



**Submission to the Royal Commission into Aged
Care Quality and Safety: Response to Counsel
Assisting's Final Recommendations**

12 November 2020

AN AUSTRALIA THAT VALUES AND SUPPORTS ALL CARERS

ABOUT CARERS AUSTRALIA

Carers Australia is the national peak body representing the diversity of Australians who provide unpaid care and support to family members and friends with a:

- disability
- chronic condition
- mental illness or disorder
- drug or alcohol problem
- terminal illness
- or who are frail aged

Carers Australia believes all carers, regardless of their cultural and linguistic differences, age, disability, religion, socioeconomic status, gender identification and geographical location should have the same rights, choices and opportunities as other Australians.

They should be able to enjoy optimum health, social and economic wellbeing and participate in family, social and community life, employment and education.

For information contact:

Ms Liz Callaghan
Chief Executive Officer
Carers Australia
Unit 1, 16 Napier Close
DEAKIN ACT 2600
Telephone: 02 6122 9910
Facsimile: 02 6122 9999
Email: lcallaghan@carersaustralia.com.au
Website: www.carersaustralia.com.au

Response to Counsel Assisting's' Final Recommendations

Introduction

We would like to thank the Royal Commission into Aged Care Quality and Safety (henceforth referred to as the Royal Commission) for the range of opportunities to present evidence which have been extended to informal carers and the organisations which support and represent them.

While this submission is focused on the recommendations that impact directly on informal carers in Counsel Assisting's final submissions and recommendations, we have also submitted a response to Counsel Assisting's wider set of recommendations for aged care reform via the pro form template provided by the Royal Commission. These include, among other things, the systemic governance of aged care, the accountability of providers, clinical and workforce standards, the health interface, designing for diversity (including regional diversity) and aged care funding.

With respect to informal carers, Carers Australia welcomes the Assisting Counsel's submissions and recommendations which acknowledge:

- that informal carers of the aged are an integral component of the aged care system and make a crucial contribution to its sustainability
- the importance of informal carers to the ability of people to age at home or in home-like environments
- the need to provide support to carers to assist them to maintain their own health and wellbeing and to assist them in their caring role.

In particular we welcome:

- The acknowledgement and inclusion of informal carers and their rights to support in the proposed new Aged Care Act.
- The need for further integration and cross-referral to supports for carers of the aged across My Aged Care and the Carer Gateway administered through the Department of Social Services.
- Flexible grant funding streams that are able to be pooled for residential and respite care (including transition) and the introduction of a capital funding component which will encourage expansion of cottage respite and other dedicated respite support initiatives.

- The establishment of a dementia support pathway and other supports for people living with dementia and their carers and families.

We do, however, have some additional points to make in relation to some of Counsel Assisting's recommendations.

Carers rights

Recommendation 1 – A new Act

1.3 a)ii [The new Act should define aged care as including] supports including respite for informal carers of people who need aged care

1.3 c)i Carers of older people should have certainty that they will receive timely and high quality supports in accordance with assessed need

1.3 c)vi The relationships that older people have with significant people in their lives should be acknowledged, respected and fostered.

Carers Australia strongly supports the inclusion of the rights of family and friend carers (informal carers) in the new Aged Care Act. These rights should be given substance by the inclusion of principles embodied in the *Carers Recognition Act* (2010)¹, including the Statement for Australian Carers which stipulates, among other things, that they be regarded as partners in care, that their role is recognised and valued, that they are supported, and that they are treated with dignity and respect.

In addition, the *Carer Recognition Act* principles should be embodied in underpinning policy principles guiding the goals, regulation and delivery of aged care.

Assessment of carers' needs for support

Recommendation 12 - A single comprehensive assessment process

12.1 By 1 July 2023, the Australian Government should replace the Aged Care Assessment Program and the Regional Assessment Services with a single assessment process. That assessment process should:

- f. include an assessment of any informal carer's needs**

¹ Carers Recognition Act (2010) <https://www.legislation.gov.au/Details/C2010A00123>

We note that, while Counsel Assisting's submission refers to the fact that assessment for eligibility for aged care services does not adequately consider the needs of informal carer beyond the sustainability of their caring role², there is no reference in the recommendations to the need for a **separate** assessment approach to identify the needs of carers in their own right.

In this context we note propositions put forward by Counsel in the Adelaide Hearing on future aged care redesign in March 2020:

"Supports for informal carers (including education and counselling) and respite should be the subject of specific assessment".³

Mr Grey added:

"Comprehensive assessment for eligibility for aged care should give attention to the needs of informal carers for older Australians in their own right, leading to quarantined entitlements for informal carers to receive support services, such as counselling and training, and also for them to receive respite."⁴

We are also unclear why improvements to carer needs assessment through My Aged Care can't be introduced before the implementation of the single aged care assessment process in 2023. There has been a long history of delaying the recognised need to address improved supports for informal carers until other, more high profile reforms, which are not necessarily integral to the changes required for carers, have been resolved.

Better integration between the Carer Gateway and Aged Care Carer Supports

Recommendation 50: Informal carers and assisting them to receive support

1.1. The Australian Government (and, from 1 July 2023, the Australian Aged Care Commission) should improve services and support for informal carers by:

² ACRC, Counsel's Assisting's Final Submissions, p.229
<https://agedcare.royalcommission.gov.au/media/29103>

³ ACRC, Counsel's Assisting submissions on Program Redesign, 4 March 2020,
<https://agedcare.royalcommission.gov.au/sites/default/files/2020-06/submissions-by-counsel-assisting-4-march-2020.pdf> / p.14

⁴ Testimony of Senior Counsel Assisting on the Future of aged care program redesign, 4 March 2020, Transcript, <https://agedcare.royalcommission.gov.au/publications/counsel-assistings-submissions-program-redesign>, p.7907

- a. **linking My Aged Care and the Carer Gateway by 1 July 2022, to enable the sharing of information to enable respite available through My Aged Care and support services available on the Carer Gateway to be identified jointly and to be provided in a co-ordinated manner**
- b. **on and from 1 July 2022:**
 - i. **enabling direct referral and information sharing for informal carers between My Aged Care, care finders, assessment services and the Carer Gateway**
 - ii. **providing accurate and up-to-date information on My Aged Care about the range of supports locally available to informal carers, including training, education, counselling, income support, and access to the Carers Hub network (once established)**
- c. **on and from 1 July 2023:**
 - i. **requiring My Aged Care, care finders and assessment services to identify informal carers when assessing a person for aged care**
 - ii. **enabling care finders to refer informal carers to assessment services for assessment for and access to formal respite care**
 - iii. **supporting and funding a community-based Carers Hub network.**

While we welcome improved integration and coordination of carer supports, we do have some concerns about how this will be achieved without further fragmentation of assessment and service access. The Carer Gateway already has a needs assessment and service referral model. We would not want carers of older people to have to work their way through two different systems and, in particular, two separate assessments in order to get the supports they need.

With respect to service referral, one option for consideration would be to transfer the referral and brokerage of planned respite the Gateway. The Carer Gateway already provides a service referrals for emergency respite.

With reference to the Carers' Hub network, we are not entirely sure what this network is and how it relates to the Carer Gateway Regional Delivery Partners whose role it is to assess carers and refer them to a range of services, including community local peer support groups and other community services which can support them. We are certainly not saying that there is not room for more funded carer support services at the local level. However there needs to be better definition of the respective roles of service delivery at different levels to avoid the fragmentation of pathways and service provision which was one reason the Carer Gateway was established.

With reference to requiring My Aged Care assessment services to identify informal carers when assessing a person for age care, we can see no reason why this cannot be immediately introduced as a requirement under the existing assessment services and that assessors should not be trained now to identify carers during the assessment of the person being cared for even if they don't self-identify.

Residential respite

Counsel Assisting note in their submission that: "Too often respite for older people and their informal carers is either not available, inadequate in nature or duration, or the services offered are substandard. Funding for residential respite care is not comparable to permanent care funding, creating a disincentive for approved providers to offer respite."⁵

We are disappointed that the recommendation of the Aged Care Financing Authority (ACFA) in its report on Respite for Aged Care Recipients⁶ that subsidies and supplements for respite care in residential facilities at least be brought into line with those available for permanent care did not make its way into Counsel Assisting's recommendations.

Aged Care Workforce recommendations – recognition of carers

Recommendation 84: Immediate funding for education and training to improve the quality of care

a) Certificate III in Individual Support and Certificate IV in Ageing Support

The need to build a suitably trained workforce with a vocation for providing high levels of care to meet current and future aged care needs is an absolute priority for the sustainability of a quality aged care system. Current and former carers who have frequently spent many years caring for a family member or friend and who are looking opportunities to re-engage with employment can be an excellent source of recruitment.

In 2014 the Commonwealth Department of Social Services commissioned the Community Services and Health Industry Skills Council to undertake a *Literature Review on Improving Recognition of Carers' Skills*. The report identified the skills acquired by

⁵ ACRC, Counsel's Assisting's Final Submissions, p.23
<https://agedcare.royalcommission.gov.au/media/29103>

⁶ Aged Care Financing Authority (ACFA), Report on Respite for Aged Care Recipients (2018),
<https://www.health.gov.au/resources/publications/acfa-report-on-respite-for-aged-care-recipients>

unpaid carers which are required in the community services, aged care, youth, housing and disability sectors. Carers' skills ticked nearly all boxes for qualifications and competencies required in the aged care, disability and community services sectors.⁷

Against this background we submit that Recognition of Prior Learning (RPL) should be accorded to carers and ex-carers seeking to acquire formal qualifications for aged care employment.

b) continuing education and training courses (including components of training courses, such as 'skill sets' and 'micro-credentials') relevant to direct care skills, including, but not limited to, dementia care, palliative care, oral health, mental health, pressure injuries and wound management.

In addition to the education and training courses identified above, aged care employees and health professional should be made familiar with the requirements of the *Carers Recognition Act* (2010). This training should embody the proactive identification of carers. Where carers are not self-identified or engaged in advocacy or administrative tasks with or on behalf of their care recipient, they may not be initially visible or easily identified. All those working in the aged care sector should have sufficient carer awareness to identify carers and recognise their rights.

In conclusion

We look forward to the Royal Commissions final report and hope that it will address points made in this submission.

⁷ Community Services and Health Industry Skills Council, *Improving Recognition of Carers' Skills Literature Review*, June 2014, pp.20-21