Suite 2, Level 2, 176 Wellington Parade East Melbourne VIC 3002 Australia



ABN 19 659 150 786

11 June 2024

Ms Andrea Kelly
Interim First Nations Aged Care Commissioner
interimFNACCconsultations@health.gov.au

Dear Ms Kelly

Consultation on improving aged care for First Nations people

The Aged & Community Care Providers Association (ACCPA) welcomes the establishment of the Interim First Nations Aged Care Commissioner and we extend our appreciation for the opportunity to contribute to this consultation on improving aged care for First Nations people.

ACCPA is the national Industry Association for aged care providers who offer retirement living, seniors housing, residential care, home care, community care and related services. We work to unite aged care providers under a shared vision to enhance the wellbeing of older Australians through a high performing, trusted and sustainable aged care sector.

We note input is sought on the following two questions:

- What changes are required to enable culturally safe, trauma-aware and healing-informed access to the aged care system for older First Nations people, carers, families and communities?
- Should there be a permanent, statutory First Nations Aged Care Commissioner? If so, what should their functions and authority be?

We are pleased to provide this submission, informed by feedback from our members, including providers who care for and engage with older Aboriginal and Torres Strait Islander people.

Culturally safe, trauma-aware and healing-informed access to aged care

- R1 The following areas, in particular, should be prioritised to support culturally safe, trauma-aware and healing-informed access to aged care:
 - implementing cultural safety training for aged care providers and workers (underpinned by sufficient and rolling funding and supports for aged care providers);
 - making the aged care system easier to access, navigate and understand; and
 increasing the First Nations aged care workforce.
- R2 The Australian Government should provide regular progress updates, that are widely communicated across the sector, on First Nations aged care reforms.

We note the Interim Commissioner is seeking feedback on the changes needed to enable culturally safe, trauma-aware and healing-informed access to the aged care system. We have interpreted the term 'access' in the broad sense to encompass factors that influence Aboriginal and Torres Strait Islander peoples' experiences across and within the aged care system.

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Accordingly, ACCPA recommends that the following areas (which emerged through feedback from members) should be prioritised to support culturally safe, trauma-aware and healing-informed access to aged care:

Implementing cultural safety training for aged care providers and workers.

We understand that work is underway by the Department of Health and Aged Care and other stakeholders on initiatives designed to enable the delivery of culturally safe aged care services for Aboriginal and Torres Strait Islander people, such as cultural safety trauma-aware healing-informed training.

Feedback from ACCPA members, including those who care for Aboriginal and Torres Strait Islander people, emphasised the importance of education and training on cultural training and safety to better understand how the needs and preferences of First Nations care recipients can be met. Aged care providers and workers should be equipped to deliver person-centred, culturally safe, flexible care to the Aboriginal and Torres Strait Islander people in their care. Aged care providers welcome the opportunity for training and supports to increase their confidence in the delivery of culturally safe and appropriate care.

Introduction of cultural safety trauma-aware healing-informed training will provide a transformational opportunity for uplifting the care for older Aboriginal and Torres Strait Islander people across Australia. ACCPA recommends that such training should be underpinned by sufficient and rolling funding and supports for aged care providers to promote optimal outcomes for older Aboriginal and Torres Strait Islander people throughout the country. A training and funding approach that is continuous will ensure aged care providers can continue to train new staff as they enter the sector.

It is also important that training materials are developed with the input of Aboriginal and Torres Strait Islander people receiving aged care services and aged care providers who provide care to Aboriginal and Torres Strait Islander people, including Aboriginal Community Controlled Organisations.

Making the aged care system easier to access, navigate and understand.

Members have also highlighted challenges in relation to accessing the aged care system, including insights based on feedback from Aboriginal and Torres Strait Islander care recipients.

Of note, members have identified a need for more focus and attention on increasing awareness of available aged care services (including ensuring information about this is easily available, accessible and clear) and supporting Aboriginal and Torres Strait Islander people to access and navigate the system. Processes should be streamlined and simplified, so that Aboriginal and Torres Strait Islander people do not need to repeat information multiple times, to multiple parties, in order to receive support.

Members have also indicated that funding for cultural liaison officers or First Nations aged care navigators, working internally with aged care providers, would be beneficial. This approach would enable them to better engage with Aboriginal and Torres Strait Islander people and support them to access aged care.

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It is important that Aboriginal and Torres Strait Islander peoples' first contact with, and experiences entering, the aged care system are culturally safe, in addition to the care provided within the system.

Increasing the First Nations aged care workforce.

Increasing the First Nations workforce across the aged care sector (including within organisations that are not Aboriginal Community Controlled Organisations) should also be a priority, with ACCPA members seeking more training and career pathways, as well as nursing and health care funded roles. Pathways to increase First Nations representation in senior roles and on Boards, particularly for organisations that provide care to Aboriginal and Torres Strait Islander people, are also important to further promote and embed culturally safe care within provider organisations.

ACCPA recommends that the Australian Government provide more regular progress updates, that are widely communicated across the sector, on First Nations aged care reforms. This should include initiatives designed to support culturally safe, trauma-aware and healing-informed access to aged care. Such communication will support greater visibility of, and engagement with, First Nations aged care reform across the sector. Mechanisms for engagement could include online newsletters (noting there have been updates in the Department of Health and Aged Care 'Your Aged Care Update' newsletter previously) and via consumer and provider peak bodies (including ACCPA).

First Nations Aged Care Commissioner

- R3 A permanent, statutory First Nations Aged Care Commissioner should be established. Supported by information-sharing arrangements with relevant government agencies, this role should work to promote the needs of Aboriginal and Torres Strait Islander people within and across the aged care system.
- R4 The permanent First Nations Aged Care Commissioner should prioritise ongoing and meaningful engagement opportunities with Aboriginal and Torres Strait Islander people, communities and stakeholders (including aged care providers that care for Aboriginal and Torres Strait Islander people).
- R5 The permanent First Nations Aged Care Commissioner should regularly update the sector on the progress of their work.

ACCPA supports the establishment of a permanent, statutory First Nations Commissioner. This role should work to promote the needs of Aboriginal and Torres Strait Islander people within and across the aged care system, to optimise care outcomes as widely as possible.

It is important that this role is able to influence and create meaningful change.

To support this, the role should be supported by information-sharing arrangements with the Department of Health and Aged Care, Aged Care Quality and Safety Commission and Independent Health and Aged Care Pricing Authority. The functions and scope of work of the First Nations Aged Care Commissioner should not be duplicative of these government agencies, in particular the regulatory and compliance functions of the Aged Care Quality and Safety Commission. However, mechanisms should be established to ensure the First Nations Aged Care Commissioner is able to work with, or inform the work of, these agencies to support improved outcomes for older Aboriginal and Torres Strait Islander people across the aged care system. Consideration should also be given to how this role will interact with the Inspector-

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General of Aged Care, particularly in relation to systemic issues affecting older Aboriginal and Torres Strait Islander people.

ACCPA has heard from our members, including those who care for Aboriginal and Torres Strait Islander people, the importance of meaningful engagement with Aboriginal and Torres Strait Islander people. Ongoing consultations with Aboriginal and Torres Strait Islander people and communities (particularly face-to-face) should be a priority for the permanent First Nations Aged Care Commissioner. The Commissioner should also consult with aged care providers, who provide care to Aboriginal and Torres Strait Islander people across the nation, and other stakeholders that contribute to supporting Aboriginal and Torres Strait Islander people in the aged care system.

Aligned to Recommendation 2, a permanent First Nations Aged Care Commissioner should provide regular updates to the sector on the progress of their work, along with any engagement and consultation opportunities.

Thank you for the opportunity to contribute to this consultation. ACCPA and our members are highly supportive of efforts to achieve an improved aged care system for older Aboriginal and Torres Strait Islander people and keen to be part of realising this vision.

If you have any questions or would like to discuss this submission, please contact Anne Liddell, Head of Policy at anne.liddell@accpa.asn.au.

Yours sincerely

Tom Symondson

Chief Executive Officer