



Name: Anonymous

Submission date: 4/06/2025

Participant background

1. For the purposes of this consultation, which of the following best describes you:

I am an organisation that provides or coordinates care services

2. Which of the following care sectors will your feedback relate to? Please select all that apply.

Aged care; Disability

3. What kind of care supports, services and programs do you have experience with, and in what jurisdictions?

The participant did not respond to this question.

1. Reform of quality and safety regulation to support a more cohesive care economy

1. To what extent do differences in quality and safety regulation make it costly or complex to provide or access care services?

To a great extent

2. What are the reasons for your answer?

Our primary experience of this occurs when an NDIS participant is living in residential aged care. While there is a very valid movement to ensure people with a disability are not inappropriately living in residential aged care, there are times, particularly in regional and remote settings, where no other form of safe and appropriate accommodation is available. We also have higher numbers of NDIS participants in our specialist First Nations aged care services, which reflects care needs and preferences for culturally safe care for this cohort.

Aged care services in Australia have a very rigorous quality and safety regulatory regime. This has been further strengthened following the Royal Commission and in preparation for the new Aged Care Act. The aged care quality regime is only partially recognised by the NDIA and when an NDIS participant lives in residential aged care, we are required to maintain dual accreditation that comes at a cost; undergo duplicative worker screening processes also carrying additional cost; report critical incidents into a separate government reporting systems with slightly different parameters; sign staff up to an additional code of conduct; and provide additional training to all facility staff on similar, but slightly different requirements, such as restrictive practices.

This has to be done if you have 1 out of 50 residents on NDIS or 20 out of 50 residents on NDIS, and can add significant cost and complexity to services. This is causing many residential aged care providers to exit service delivery for NDIS participants, which may be the desired effect of the approach given the movement referenced above. However it doesn't solve underlying structural issues around specialist disability accommodation and care and effectively penalises providers who make a compassionate decision to

take someone on when they have nowhere else to go. This is also a barrier and cost issue for specialist residential services where a person may choose to live there to be close to their community Elders and access culturally safe care.

3. To what extent should quality and safety regulations be more aligned across the different care service sectors and jurisdictions?

To a great extent

4. What are the reasons for your answer?

In the example above, there are significant opportunities to align regulation, through mutual recognition of standards, consolidation of various worker screening regimes, codes of conduct etc. Achieving this would deliver significant benefits to organisations operating across multiple service delivery sectors.

We do acknowledge this is a difficult task. While there are efficiencies to be gained, we acknowledge these are high risk service delivery areas each being subject to recent Royal Commissions. Public inquiries following sentinel events often lead to additional compliance requirements that are specific to the sub-sector and the issues highlighted through the inquiry process. They are also highly public and political in nature. This increases the challenge of streamlining regulation across different service streams and between state and federal jurisdictions.

For example, in Queensland we have a Working with Children Check - Blue Card, which is separate to a disability Yellow Card. There has been long term resistance to streamlining these checks into a single card, as the Blue Card was introduced following a child protection inquiry and has a strong public reputation as a reliable safety check.

This is not to say alignment cannot be achieved. The Human Services Quality Framework in Queensland brought together three sets of quality standards into a single framework. This work was the result of a government committed to streamlining while working in partnership with not-for-profit care providers.

Achieving greater alignment is one way to reduce compliance burden on care organisations while still maintaining appropriate standards for quality and safety. Reducing this burden achieves cost savings that can be reinvested by the organisation into other areas that can drive productivity, innovation and excellence. We support efforts taken by government to work in this area and would welcome the opportunity to participate.

2. Embed collaborative commissioning to increase the integration of care services

1. What is your experience with collaborative commissioning

The participant did not respond to this question.

2. What are the benefits of pursuing greater collaborative commissioning?

The participant did not respond to this question.

3. What are the barriers to collaborative commissioning, and do you have any suggestions for solutions that would lead to better collaboration in the commissioning of care services?

The participant did not respond to this question.

3. A national framework to support government investment in prevention

1. What are the main barriers to governments investing in evidence-based prevention programs across the care economy?

The participant did not respond to this question.

2. What are some examples of successful prevention programs (this could include discontinued programs)?

The participant did not respond to this question.

3. How can governments better support investment in prevention activities that have broad and long-term benefits for the Australian community?

The participant did not respond to this question.