



Name: Wes Morris

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Participant background

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

I am an interested community member

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

Aboriginal Community Controlled; Aged care; Health

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?

Somewhat

2. What are the reasons for your answer?

When the Productivity Commission Releases its Discussion Papers in July and August, I will have much more to say on this topic at that stage.

However, for now, I make just this one early/ interim comment:

""Hopefully the Productivity Commission's Discussion Paper on the Delivering Quality Care More Efficiently Will Recognise That Australia is a Multicultural Society. And That We Are a Society With a Rapidly Ageing Population.""

In regards to this issue of quality across the Care Economy, some of the critical elements and drivers for these issues of Ageing and Multiculturalism will include the following :

- Aged Care Statement of Rights <https://www.agedcarequality.gov.au/workers/reform-changes-workers/statement-rights>

- Aged Care Strengthened Quality Standards

<https://www.agedcarequality.gov.au/providers/quality-standards/strengthened-quality-standards>

- Inclusive and Culturally Safe Governance

<https://www.agedcarequality.gov.au/sites/default/files/media/flipguide-10-inclusive-and-culturally-safe-governance.pdf>

- Aboriginal and Torres Strait Islander Aged Care Framework

<https://www.health.gov.au/sites/default/files/2025-02/aboriginal-and-torres-strait-islander-aged-care-framework.pdf>

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?

Response Context: The Interface Between the Aged Care System of the Commonwealth and the Hospital System [Private and Public].

I am in the process of writing at some length [in coming weeks] to the Commonwealth and State Governments in regards to the intersection between the Hospital Sector and the Aged Care Sectors. The Commonwealth is in the process of currently rolling out its new Support at Home Program <https://www.health.gov.au/our-work/support-at-home/about>. This initiative has considerable merit, and I am particularly encouraged by some elements of the February 2025 Strengthened Aged Care Quality Standards <https://www.health.gov.au/sites/default/files/2025-02/strengthened-aged-care-quality-standards-february-2025.pdf>. But I have concerns about the real – world applicability and effective implementation of the following Outcomes as described in those Standards:

- Outcome 3.4: Planning and coordination of funded aged care services
- Outcome 5.7: Palliative care and end-of-life care
- Outcome 7.2: Transitions

I particularly have concerns about how the Support at Home Program ie an Aged Care Program of the Commonwealth will interface with the Hospital system, run by the States or by private for – profit providers. I am in the process of writing to Governments about these concerns, and sharing some suggestions and recommendations as to how to improve the interface between these two systems.

I will have a fairly detailed and comprehensive document on this topic developed by late June 2025.

In the meantime, I am sharing an Interim version of this document with the Productivity Commission on 06 June 2025. In this Interim document I note three phases of development for the Aged Care Sector in Australia, as follows:

- Healthy Care Homes – being a Trial pilot program rolled out in selected trial sites
- Aged Care Packages – being a universal program available to all Australians. This program is scheduled to end on 31 October 2025
- Support at Home Program – Being the main program of implementation for the Aged Care Act 2024. Was to have started on 01 July 2025, but the Commonwealth recently postponed the start date to 01 November 2025.

So, over the period 2015 to now, ie over the last decade, there has been progress in and there have been improvements in the interface between Commonwealth and State programs. However, as I illustrate in the Interim Report being sent to the Productivity Commission today, there is still considerable room for improvement in regards to this bilateral interface..

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

1. What is your experience with collaborative commissioning

I will have a fairly detailed and comprehensive document on this topic developed in readiness to share with the Productivity Commission in July or August. In the meantime, I am sharing an Interim version of this document with the Productivity Commission on 06

June 2025.

The Productivity Commission is interested in examining each of the following:

1. A more cohesive Care Economy;
2. Opportunities for Collaborative Commissioning across PHNs and ACCHSs;
3. Increasing Government levels of Investment in to Prevention.

If we begin with point #3, increasing Government levels of investment in to Prevention, then a big thank you to Cairney and Denny for their deeply insightful 50 page book on this topic ie Why Isn't Government Policy More Preventive?.

<https://paulcairney.wordpress.com/wp-content/uploads/2023/02/cairney-st.denny-2020-why-isnt-government-policy-more-preventive-intro-and-conclusion.pdf> As Cairney and Denny illustrate, 'Prevention' is an extremely broad term encompassing three distinct areas:

1. Primary Prevention - Whole of Population;
2. Secondary Prevention - At Risk Groups Early Stage; and
3. Tertiary Prevention - At Risk Groups Not Getting Worse, and Not Spreading.

In the First Nations space, we see these same three preventative spaces described in numerous documents, including these two, which serve here just as exemplars:

- Solutions that work - What the evidence and our people tell us
<https://www.niaa.gov.au/resource-centre/solutions-work-what-evidence-and-our-people-tell-us>
- The Aboriginal Empowerment Strategy Western Australia 2021-2029 Policy Guide
https://www.wa.gov.au/system/files/2025-04/aboriginal.engagement.strategy.policy.guide_.pdf

In the second of these documents, we read as follows:

- Culture is at the heart of a secure foundation for life, and provides the landscape in which futures are imagined, chosen and pursued [page 24]
- Currently, State Government expenditure in relation to Aboriginal people is skewed towards the crisis category. These services are more cost-intensive, depend more on involuntary or coercive engagement, and involve higher risks. If current trends continue, demand for these “downstream” services is set to increase significantly in coming years. [page 33].

Current patterns of Government expenditure are hugely unproductive and expensive. If the Productivity Commission truly wishes to explore the issue of Productivity in regards to the Care Economy, as it pertains to Indigenous Australians, then the Productivity Commission has to get serious about exploring the huge barriers to Governments investing in First Nations cultural programs [delivered by Cultural organisations, not Health organisations], which are the cornerstone of First Nations primary prevention and community resilience.

There is certainly value in the Productivity Commission exploring Collaborative Commissioning across PHNs and ACCHSs. However, if the Productivity Commission is genuinely interested in improving productivity and is genuinely interested in lifting government investment in to prevention, then the more significant field of inquiry for the Productivity Commission is around investing in First Nations Cultural programs.

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

Response Context: Aboriginal Cultural Programs In the Context of the WA State Commissioning Strategy and the WA Aboriginal Empowerment Strategy Which States as Follows: 'Put Culture at the Heart'

In August 2022 the WA Government published its State Commissioning Strategy for Community Services <https://www.wa.gov.au/government/publications/state-commissioning-strategy-community-services-2022>

By mid-2024, two years later, there was little evidence that the WA Government had in fact adopted a Commissioning approach to Services. And there was even less evidence that the Government had adopted an approach of Co Designing Services with Aboriginal Community Controlled Organisations.

The Productivity Commission described the stasis and the glacial pace of action in the following terms:

""The Commission's overarching finding is that there has been no systematic approach to determining what strategies need to be implemented to disrupt business-as-usual of governments. What is needed is a paradigm shift. Fundamental change is required, with actions based on a clear logic about how they will achieve that change. It is too easy to find examples of government decisions that contradict commitments in the Agreement, that do not reflect Aboriginal and Torres Strait Islander people's priorities and perspectives and that exacerbate, rather than remedy, disadvantage and discrimination.""

Productivity Commission, January 2024, Review of the National Agreement on Closing the Gap, page three of the Study Report.

<https://www.pc.gov.au/inquiries/completed/closing-the-gap-review/report>

If indeed there was an actual implementation of Commissioning, then there would be multiple benefits. The WA State Commissioning Strategy for Community Services states as follows:

""The future of community service delivery will be grounded in key principles applicable to both government and the community services sector. These principles have been identified based on research, the Independent Review Panel report and consultation with community services sector peak bodies, service providers and the Aboriginal Advisory Council of WA.

A community and person-centered approach focused on outcomes

1. Prioritise outcomes for service users through community and person centered and outcomes focused commissioning that delivers social value at an individual and population level.

2. Plan and design integrated and place-based services, with a focus on moving from prevention to early intervention.

A sustainable system

1. Commission sustainable services, at a fair and appropriate price that deliver value.

2. Develop a competent workforce of commissioners and service providers with necessary capability and capacity.

3. Drive continuous improvement of the system through strengthened monitoring, evaluation and review of services and outcomes.

Inclusive services - focus on Aboriginal outcomes and partnerships

1. Services are co-designed and locally led.

2. Engagement is led and informed by Aboriginal, Culturally and Linguistically Diverse
3. (CALD) communities and other priority groups, ensuring needs are recognised within government strategies at a whole of system level.

4. Prioritise Aboriginal empowerment in the delivery of outcomes for Aboriginal people, organisations and communities.

Well-led, supported and transparent system

1. Work to establish a whole-of-system approach with clear roles, responsibilities and mechanisms for central oversight and system accountability.

2. Develop a quality evidence-base to support fair and transparent decision-making.

<https://www.wa.gov.au/government/publications/state-commissioning-strategy-community-services-2022#how-we-shift-to-commissioning-key-themes-and-guiding-principles>""

In the above, I note in particular the following:

""Services are co-designed and locally led.""

And I note the following resource on the Productivity Commission's website, the KIMBERLEY CO-DESIGN GUIDE for the Kimberley Aboriginal Youth Wellbeing Partnership:

https://www.pc.gov.au/__data/assets/pdf_file/0005/353318/sub023-closing-the-gap-review-attachment1.pdf

I personally led the development of this document, and other regional Co Design Guides. And, despite the commitments and undertakings from the Government, including as expressed in the State Commissioning Strategy for Community Services, years later the Co Design Guides have not been adopted and implemented in practice by the Government of WA. This is indicative of the conclusions drawn by the Productivity Commission:

""no systematic approach to determining what strategies need to be implemented to disrupt business-as-usual of governments. What is needed is a paradigm shift. ""

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?

Response Context: Aboriginal Cultural Programs In the Context of the WA State Commissioning Strategy and the WA Aboriginal Empowerment Strategy Which States as Follows: 'Put Culture at the Heart'

Focusing on the Productivity Commission's interest in Preventative Programs, one can read the following words on page 33 of the WA Government's Aboriginal Empowerment Strategy Policy Guide of 2021:

""Currently, State Government expenditure in relation to Aboriginal people is skewed towards the crisis category. These services are more cost-intensive, depend more on involuntary or coercive engagement, and involve higher risks. If current trends continue, demand for these "downstream" services is set to increase significantly in coming years. Preventative and early intervention initiatives can bring about positive changes that reduce the need for crisis responses. Initiatives in this category proactively build up resilience, capability, healing, and independence – in short, self-determination.""

<https://www.wa.gov.au/organisation/departments/departments/department-of-the-premier-and-cabinet/aboriginal-empowerment-strategy-western-australia-2021-2029>

Notwithstanding this lovely set of words, between 2021 and mid 2024 I had a front row seat and was exceptionally well placed to see what, if any, progress was being made in shifting towards 'Putting Culture at the Heart', as per pages 24 – 26 of the Aboriginal Empowerment Strategy Policy Guide. In that time I was unable to identify any significant or meaningful progress from the WA Government, or from the Commonwealth. I no longer have that front row seat, but I have not been furnished with any evidence or any reason to think or even suspect that things might have changed and improved since mid-2024.

Note here, once again, that improving collaboration between PHNs, LHNs and ACCHOs may well generate better systems, and thus better efficiencies, but the real productivity dividends lie elsewhere. For systemic change, not mere system change, then we need to look once again at the raft of reports around the critical role that culture plays in contributing to First Nations wellbeing.

There have been a number of significant Australian reports released in recent years on the need for investment in cultural determinants of Indigenous health, including:

- Feb 2018: My Life My Lead – Opportunities for strengthening approaches to the social determinants and cultural determinants of Indigenous health: Report on the national consultations December 2017 (Dept of Health)
- June 2020: '... Country Can't Hear English...' – A guide to implementing cultural determinants (Professor Kerry Arabena)
- Feb 2021: Culture is Key: Towards cultural determinants-driven health policy (Lowitja Institute)
- Dec 2021: The National Aboriginal and Torres Strait Islander Health Plan 2021–2031 (Dept of Health)
- Sept 2022: Connected Lives: Creative solutions to the mental health crisis (Australia Council- Now Creative Australia)
- March 2023: Strong Culture, Strong Youth: Our Legacy, Our Future (Close the Gap Campaign Report 2023)

On page 4 of her June 2020 Report, Professor Kerry Arabena expresses the same concepts in these following words:

""In Australia, nearly 35 per cent of the health gap between Aboriginal and Torres Strait Islander and non-Indigenous Australians is attributable to the social determinants of health, including the physical, social, emotional and cultural wellbeing of individuals and their community. This gap rises to 53.2 per cent when combined with behavioural risk factors such as tobacco and alcohol use, dietary factors and physical inactivity (Australian Government 2017b:4). It is proposed that an antidote to this experience is the adoption of a whole-of-life view that encompasses regeneration and renewal, health and wellbeing, and an acknowledgment of the vitality that culture provides Aboriginal and Torres Strait Islander peoples. ""

'...Country can't hear English...' A Guide supporting the implementation of cultural determinants of health and wellbeing with Aboriginal and Torres Strait Islander peoples <https://www.karabenaconsulting.com/resources/country-cant-hear-english>

There is certainly value in the Productivity Commission exploring Collaborative Commissioning across PHNs and ACCHSs. However, if the Productivity Commission is genuinely interested in improving productivity and is genuinely interested in lifting

government investment in to prevention, then the more significant field of inquiry for the Productivity Commission is around investing in First Nations Cultural programs.

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?

Response Context: Aboriginal Cultural Programs In the Context of the WA State Commissioning Strategy Which Calls for Co Design Approaches to Service Delivery

The Productivity Commission asks:

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?

At the conceptual level, a big thank you to Cairney and Denny for their deeply insightful 50 page book on this topic ie Why Isn't Government Policy More Preventive?.

<https://paulcairney.wordpress.com/wp-content/uploads/2023/02/cairney-st.denny-2020-why-isnt-government-policy-more-preventive-intro-and-conclusion.pdf>

Prior to reading Cairney and Denny's book I had a somewhat simplistic view, relating to political motivations. And certainly it is exceedingly easy to point to political slogans which win elections on the basis of NOT investing in preventative programs ie eg between August and October 2024, Queensland's Courier Mail published 173 articles about youth crime in just 90 days. These articles amplified the mantra Adult Crime, Adult Time, and it was an election – winning mantra for Queensland's LNP. But beyond those obvious political motivations, Cairney and Denny do analyse a range of complex factors which serve to individually and collectively work against investing in preventative measures.

But I did want to focus my comments here today on the First Nations space in particular. And the best answers to these questions around Government under – investment in the preventative space come from the Productivity Commission itself, as expressed in its January 2024 report Review of the National Agreement on Closing the Gap Study report. This Productivity Commission Report contains the following Recommendations:

""• Recommendation 1: Power needs to be shared
• Recommendation 2: Indigenous Data Sovereignty needs to be recognised and Supported
• Recommendation 3: Mainstream systems and culture need to be fundamentally Rethought
• Recommendation 4: Stronger accountability is needed to drive behaviour change
[Pages 7 – 9]""

And I note once again the following resource on the Productivity Commission's website ie the KIMBERLEY CO-DESIGN GUIDE for the Kimberley Aboriginal Youth Wellbeing Partnership:

https://www.pc.gov.au/__data/assets/pdf_file/0005/353318/sub023-closing-the-gap-review-attachment1.pdf

Once again I note that I personally led the development of this document, and other

regional Co Design Guides.

I am today, 06 June 2025, sharing with the Productivity Commission a separate document, being:

Interim/ Draft Submission- Aboriginal Culture and its Relationship With Wellbeing
[Including Comments Relating to Suicide Prevention]

In that separate document shared with you today I write as follows:

""Current patterns of Government expenditure are hugely unproductive and expensive. If the Productivity Commission truly wishes to explore the issue of Productivity in regards to the Care Economy, as it pertains to Indigenous Australians, then the Productivity Commission has to get serious about exploring the huge barriers to Governments investing in First Nations cultural programs [delivered by Cultural organisations, not Health organisations] which are the cornerstone of First Nations primary prevention.""

In that separate document shared with you today I explore these concepts in much more detail.

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

I note in particular the Findings and Recommendations from the WA Parliament Education and Health Standing Committee in its November 2016 Report: Learnings from the message stick- The report of the Inquiry into Aboriginal youth suicide in remote areas:

""Finding 8 Page 57

There is increasing evidence that culturally-based programs have the greatest impact in preventing suicide; however, the Western Australian Government has demonstrated reluctance in funding programs of this nature.

Recommendation 7 Page 57

That Western Australian Government agencies recognise the importance of cultural knowledge as a protective factor preventing Aboriginal youth suicide.

Recommendation 8 Page 57

That the Western Australian Government set aside an appropriate portion of grant expenditure to fund more culture-embedded programs for Aboriginal young people across the state.""

Learnings from the Message Stick cites and briefly profiles the following preventative programs:

""• The Aboriginal and Torres Strait Islander Suicide Prevention Evaluation Project (ATSISPEP)

[page 253]

- Alive and Kicking Goals! [page 253]
- Yiriman Project [page 255]
- National Empowerment Project [page 257]
- Red Dust Healing [page 258]
- StandBy Suicide Response [page 264]
- Headspace [page 265]""

If we select just one of the preventative programs cited and profiled by the WA Parliament Education and Health Standing Committee, then we can note that there have been a plethora of reports recommending funding for the Yiriman Project. This plethora of reports is not to even mention the many positive reviews, evaluations, profiles and

articles about this highly successful cultural initiative.

1. Ways Forward – Beyond the Blame Game: Some Successful Initiatives in Remote Indigenous Communities in WA – WA Parliament Legislative Assembly Education and Health Standing Committee, May 2008
2. Alcohol Restrictions in the Kimberley: A Window of Opportunity for Improved Health, Education, Housing and Employment – WA Parliament Legislative Assembly Education and Health Standing Committee, March 2011
3. Doing Time – Time for Doing: Indigenous Youth in the Criminal Justice System – Commonwealth of Australia Parliament House of Representatives Standing Committee on Aboriginal and Torres Strait Islander Affairs, June 2011
4. Balgo Coronial Inquest Report – WA State Coroner Alistair Hope, October 2011
Fitzroy Crossing Local Implementation Plan [for Closing the Gap] – Commonwealth of Australia & Government of Western Australia, 2012
5. Overcoming Indigenous Disadvantage: Key Indicators 2014 Report – Commonwealth of Australia Productivity Commission, Steering Committee for the Review of Government Service Provision, 2014
6. Overcoming Indigenous Disadvantage: Key Indicators 2016 Report – Commonwealth of Australia Productivity Commission, Steering Committee for the Review of Government Service Provision, 2016
7. Message Stick Report – WA Parliament Legislative Assembly Education and Health Standing Committee, November 2016
8. Coronial Inquest Report – WA State Coroner Ros Fogliani, February 2019

The plethora of such reports has not led to any material change in funding levels for the Yiriman Project . Why? Because, as stated numerous times in this document and in other accompanying documentation, Governments have no interest in funding Aboriginal cultural programs because they exist in the primordial prevention space, and Governments have: a) little or no interest in primordial prevention programs; and b) little or no understanding of or valuing of First Nations Culture.

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

Response Context: Aboriginal Cultural Programs In the Context of the WA Aboriginal Empowerment Strategy Which a) Says to 'Put Culture at the Heart' and b). Calls on Government [itself] to shift away from its current downstream funding model to an upstream funding model.

Focusing on the Productivity Commission's interest in Preventative Programs, one can read the following words on page 33 of the WA Government's Aboriginal Empowerment Strategy Policy Guide of 2021:

""Currently, State Government expenditure in relation to Aboriginal people is skewed towards the crisis category. These services are more cost-intensive, depend more on involuntary or coercive engagement, and involve higher risks. If current trends continue, demand for these "downstream" services is set to increase significantly in coming years. Preventative and early intervention initiatives can bring about positive changes that reduce the need for crisis responses. Initiatives in this category proactively build up resilience, capability, healing, and independence – in short, self-determination.""

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In May 2016 the WA Department of Culture and the Arts published a 50 – page long discussion paper, DCA Reference 15/751, with the following title:
Investing in Aboriginal Culture: The role of culture in gaining more effective outcomes from WA State Government services

On page four of this WA DCA Discussion Paper one reads as follows:

""This paper reviews the outcome of Government expenditure on Aboriginal culture and arts, and assesses how that investment can contribute to positive outcomes for Aboriginal people across employment, culture, education, mental health, and general health and wellbeing.

In terms of broad socio-economic outcomes, there is a substantial and growing body of academic and case evidence that Government programs or services targeted towards improving outcomes for Aboriginal people on a range of social and economic issues will be more effective if delivered within an environment where Aboriginal culture is recognised, valued and resilient.

This paper proposes that a consolidated and targeted approach to the investment in Aboriginal culture and arts will increase cultural attachment, increasing subjective wellbeing for individuals and communities, leading to improved socio-economic outcomes.""

Nearly ten years later, and there is to this day no implementation of any of the key proposals described in this May 2016 WA DCA report.

Current patterns of Government expenditure are hugely unproductive and expensive. If the Productivity Commission truly wishes to explore the issue of Productivity in regards to the Care Economy, as it pertains to Indigenous Australians, then the Productivity Commission has to get serious about exploring the huge barriers to Governments investing in First Nations cultural programs [delivered by Cultural organisations, not Health organisations], which are the cornerstone of First Nations primary prevention and community resilience.