

8 March 2024

Department of Health and Aged Care - New Aged Care Act Consultation
GPO Box 9848
Canberra ACT 2601
Australia

Submitted via: AgedCareLegislativeReform@health.gov.au

Dear New Aged Care Act Consultation Team,

APS submission to the Consultation about the Australian Government's Exposure Draft of the new Aged Care Act

The Australian Psychological Society (APS) is the leading professional association for psychologists in Australia. We advocate on behalf of our members and the community to bring about meaningful reform in Australian health, wellbeing and social policies and systems. Our overarching objective is to ensure equitable access for all Australians to high-quality services that promote health and wellbeing through proactive measures, prevention, early intervention and treatment.

Our work is informed by a human rights approach and aligned with the United Nations' Sustainable Development Goals (SDGs)¹. We advocate for a fair, inclusive, and environmentally sustainable society, recognising the evidence that national and global prosperity now and in the future hinges on prioritising the health and wellbeing of people and planet².

We are pleased to have the opportunity to respond to the Department of Health and Aged Care's consultation on the Exposure Draft of the new Aged Care Act, noting the intent of the Government to introduce the Act to Parliament later this year.

The APS offers our unreserved support for a human rights-based approach to the new Aged Care Act; one that puts the rights and needs of older people first and aligns with the foremost recommendation of the Royal Commission into Aged Care Quality and Safety for the Australian Government to develop such legislation.

We do, however, have strong reservations about the extent to which, in its current form, the Act will ensure all older people can access high-quality, safe home care and residential care when and where they need it.

¹ United Nations, Department of Economic and Social Affairs. (2023). *Sustainable development goals*. <https://sdgs.un.org/goals>

² De Neve, J.-E., & Sachs, J. D. (2020). Sustainable development and human well-being. *World Happiness Report*, 112–127.

We draw your attention to the conclusion of the Royal Commission that allied health should be regarded as a fundamental element of the aged care system. Yet, the care provided by psychologists and other allied health professions remains significantly underprovided and underfunded, particularly in residential aged care. The [APS Position Statement on Psychologists in Residential Aged Care](#) summarises the high level of unmet mental health care needs and our stance on the crucial role of psychologists in enhancing the well-being, health and quality of life of older people receiving care.

The APS commends the Department's dedication to improving the aged care system. However, the current aged care reforms have yet to sufficiently address the integration of psychologists and other allied health professionals. Specifically, there is a lack of nationally consistent assessment for allied health care needs, no mandatory benchmarks (as seen in nursing and personal care), and no dedicated funding to address these needs.

Regrettably, in its current form the new Act also does not adequately tackle these concerns. For example, it does not provide substantive reference to allied health or reablement care.

The submission from the Allied Health Professions Australia (AHPA) details these concerns and more about the Exposure Draft of the new Aged Care Act. As a member of the AHPA Aged Care Working Group, the APS supports the AHPA submission and endorses their recommendations regarding the integration of allied health services and the preservation of the rights of older people to receive tailored high-quality aged care as foundational versus aspirational.

If any further information is required from the APS, I can be contacted at our national office on (03) 8662 3300 or by email at z.burgess@psychology.org.au

Yours sincerely,

Dr Zena Burgess, FAPS FAICD
Chief Executive Officer