



# **A new model for regulating Aged Care**

A Dementia Australia Submission to the Australian Government Department of Health

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## **Dementia in Australia**

Dementia Australia is the peak dementia advocacy organisation in Australia. We support and empower the estimated half a million Australians living with dementia and 1.6 million people involved in their care. Dementia is the term used to describe the symptoms of a large group of neurocognitive disorders which cause a progressive decline in a person's functioning. The condition is one of the largest health and social challenges facing Australia and the world. Without a significant medical breakthrough, it is estimated that there will be almost 1.1 million people living with dementia by 2058. <sup>i</sup>

## **Introduction**

Dementia Australia is grateful for the opportunity to provide a submission on this consultation on a New Approach to Regulating Aged Care. We have chosen to focus on three key areas that we believe are critical to the development of an effective approach to aged care sector regulation: worker education and registration, consumer information and engagement, and continuous improvement.

## **Aged Care Worker Education and Registration**

Inadequate education, training and support provided to the aged care workforce over many decades has been consistently linked with the variable quality of dementia care in the sector. The potentially profound impacts of an underequipped and undereducated workforce on older people, especially those living with dementia, have been documented in detail in the Royal Commission into Quality and Safety in Aged Care report and elsewhere. A skilled, knowledgeable and confident aged care workforce is therefore integral to improving the quality of care delivered in the sector.

A new aged care framework must be fundamentally underpinned by an appropriately educated and nationally registered aged care workforce. Workforce-related issues are specifically linked to three safeguards in the proposed new model: regulation, provider responsibilities and market oversight. The consultation paper emphasises 'suitability checks and requirements that aged care workers must go through. This includes an assessment of whether a person who provides, or seeks to provide, care and services to older Australians poses any risk to them.'

Dementia Australia strongly endorses the need for rigorous screening of aged care workers, but a critical component of this screening process must involve identifying if workers have the appropriate knowledge and skills to enter, and remain employed in, the aged care sector. It is estimated that two thirds of aged care residents living in the 2700 aged care homes across Australia have a diagnosis of moderate to severe cognitive impairment.<sup>ii</sup> 65 per cent of all people diagnosed with dementia in Australia

live in the community so it is critical that the workforce in both residential and home and community aged care have appropriate dementia care skills and knowledge. There are currently no minimum compulsory dementia education requirements for the aged care workforce – this includes personal care workers, enrolled and registered nurses. Registered and Enrolled Nurses do not require specialist training or qualifications to work in the sector, and recent analyses show most do not have relevant qualifications or knowledge, particularly in the critical areas of best practice palliative and dementia care.<sup>iii</sup>

Dementia Australia strongly advocates for compulsory dementia education for all staff working in the aged care sector in combination with improved education and qualification pathways, and ongoing professional development. A rigorous knowledge of dementia, and person-centred approaches to dementia care, must form part of any minimum levels of qualification required to enter, and continue to work in, the aged care sector. Given the varying quality of VET and other training and education offerings currently provided to the aged care workforce identified through previous reviews, clear standards must be developed for determining the quality of dementia education provided nationally. These minimum qualification levels and nationally consistent dementia education standards must be linked to the proposed regulation (worker registration), provider responsibilities (standards of care) and market oversight (compliance and monitoring) safeguards outlined in the new framework.

“If you can get it right for dementia, you can get it right for everyone else.”  
Person living with dementia

## **Consumer Engagement and Information**

For many current consumers, the aged care sector is an opaque and frustrating system. Identifying and accessing appropriate services and supports is often a time-consuming and unsatisfactory experience. Lack of awareness of potential services, difficulties navigating My Aged Care and other service points, and lengthy waiting lists are among the many concerns that have been well documented. In addition to the aged care system, people with dementia, their families and carers, are often required to navigate their way through multiple care systems, as their dementia progresses. This can compound the challenges involved in identifying and selecting appropriate services.

Engaging current and potential consumers effectively by providing accessible information, and enabling consumers to make informed choices about aged care services, will be key to the efficacy and rigour of the new regulatory framework. Dementia Australia strongly supports the proposed measures comprising Safeguard 4, including the provision of information, and engagement and consultation with consumers. Australia is a culturally, socially and ethnically diverse country so the new framework must be inclusive and make provision for the specific challenges associated with information sharing, and the engagement, education and

consultation processes for people from diverse backgrounds and minority communities. This inclusive approach must equally extend to the provision of appropriate and accessible information, and meaningful consumer engagement with people living with dementia, their families and carers.

## **Continuous Improvement**

Dementia Australia is pleased that continuous improvement and capability building, as outlined in measures within Safeguards 2 – 4, are embedded as foundational in the new regulatory framework. These measures are critical to encouraging the aged care sector to aspire to, and achieve, the provision of high-quality aged care, including dementia care. Achieving a balance between encouraging providers to be honest about areas requiring improvement, in a regulatory environment where there are potential sanctions and risks associated with such transparency, will be challenging. We make the following observations about the way in which the proposed model addresses these challenges:

- The model will support continuous improvement in part but will require more detailed and nuanced consideration in relation to who, how, why and when capability gaps and improvement needs are measured and addressed without sacrificing compliance
- Peak bodies such as Dementia Australia are well placed to support the Commission to build the capacity and capability of the sector to deliver genuine, high quality care including dementia care
- To permanently embed continuous improvement that enhances quality care, the model should consider:
  - Baseline data collection and sharing across the sector, including benchmarking
  - Utilisation of the **Dementia Practice Health Check** for providers to better understand their current capabilities and improvement needs
  - Understanding and improvement of foundational skills and capabilities required across the sector to improve quality care
  - Investment in dementia training organisations, including Dementia Training Australia and Dementia Australia, to deliver capacity building
  - Consideration of expansion of Communities of Practice/Learning Communities as one model to encourage local improvement and information sharing at middle management and frontline levels
  - Ensuring consumers, including people living with dementia and carers, are central to informing and evaluating all continuous improvement endeavours

## Conclusion

Dementia Australia strongly supports the need to reform aged care regulatory measures in order to achieve sustained and genuine improvement in the quality of dementia care in the sector. We have limited our submission to addressing three key areas outlined in the consultation paper but given the breadth and complexity of the proposed reforms and the scope of the new regulatory model, we would welcome further opportunities for consultation on these important issues.

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<sup>i</sup> Dementia Australia. Dementia Prevalence Data 2018-2058, commissioned research undertaken by NATSEM, University of Canberra, 2018.

<sup>ii</sup> Caughey GE, Lang CE, Bray SC, Moldovan M, Jorissen RN, Wesselingh S, Inacio MC. (2020) International and National Quality and Safety Indicators for Aged Care. Report for the Royal Commission into Aged Care Quality and Safety. South Australian Health and Medical Research Institute, Adelaide, South Australia

<sup>iii</sup> National Institute of Labour Studies Report. The aged care workforce, 2016. [https://gen-agedcaredata.gov.au/www\\_ahwqgen/media/Workforce/The-Aged-Care-Workforce-2016.pdf](https://gen-agedcaredata.gov.au/www_ahwqgen/media/Workforce/The-Aged-Care-Workforce-2016.pdf), 2017