

Submission to the Independent Capability Review of the Aged Care Quality and Safety Commission

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Submitted by the Centre for Cultural Diversity in Ageing (supported by Benetas)

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Introduction

The Centre for Cultural Diversity in Ageing is pleased to provide a submission for the Independent Capability Review of the Aged Care Quality and Safety Commission. The Centre for Cultural Diversity in Ageing focuses on supporting the aged care system in becoming more culturally inclusive and therefore it will be focusing its response on 3.g) of the Terms of Reference being –

- “The capability of the Commission to undertake monitoring and enforcement activities for aged care services providing care for older people with dementia, culturally and linguistically diverse consumers and specific diversity groups including Aboriginal and Torres Strait Islander people, veterans and the LGBTIQ+ communities.”¹

About the Centre for Cultural Diversity in Ageing

The Centre for Cultural Diversity in Ageing (The Centre), supported by Benetas, currently receives project funding from the Australian Government Department of Health and Aged Care to administer the Partners in Culturally Appropriate Care (PICAC) program. The PICAC program provides funding to an organisation in each state and territory who is funded to:

- Improve partnerships between aged care service providers, culturally and linguistically diverse communities and the Department of Health and Aged Care;
- Ensure the special needs of older people from diverse cultural and linguistic backgrounds are identified and addressed.

1. <https://consultations.health.gov.au/aged-care-access-and-quality-acaq/independent-capability-review-of-the-aged-care-qua/>

The Centre is the PICAC Victoria provider and delivers expertise in relation to culturally inclusive policy and practice for the aged services sector. It has over 20 years of experience in supporting aged care providers in addressing the needs of older people from Culturally and Linguistically Diverse (CALD) backgrounds.

The purpose of The Centre is to build the capacity and capabilities of Australian aged care providers to deliver services that are welcoming, inclusive and accessible. The Centre's service areas include:

- Inclusive practice training and workshops;
- Capacity building to promote cultural inclusion and equity;
- Diversity, equity and inclusion advice and consulting.

The Centre's Commitment to Diversity and Inclusion within Aged Care

The Centre works with aged care providers to better respond to the needs and preferences of older people from CALD backgrounds. As part of The Centre's work on inclusive care, the [Inclusive Services Standards](#)² have been developed to guide and train aged care organisations to deliver inclusive services. The Inclusive Service Standards provide a framework for services to adapt and improve their services and organisational practices so they are welcoming, safe and accessible. By meeting the Inclusive Service Standards aged care providers will be able to:

- Better understand the diverse interests, goals and needs of their consumers;
- Empower consumers to make informed decisions about their service provision;
- Deliver flexible, accessible services free of barriers and discrimination; and
- Implement a Consumer Directed Care approach and achieve quality outcomes for all consumers.

The Inclusive Service Standards have been recognised by the Aged Care Quality and Safety Commission as a key resource in working towards a more inclusive aged care system.

Statistics on cultural diversity within the aged care sector

Many Australians from culturally and linguistically diverse backgrounds face barriers in accessing and engaging with services that support wellbeing, although these Australians are by nature heterogeneous, and their needs vary greatly. At 30 June 2021 (or during the 2020–21 financial year for home support):

- Across all aged care services, 33% of people were born overseas. Of those, 66% were born in non-English-speaking countries, and 34% were born in other English-speaking countries.³

In Department of Health and Aged Care data from 2020 notes that around **28%** of people using home care and **20%** of people using permanent residential and respite care were from a Culturally and Linguistically Diverse (CALD) background (in this case the Department of Health and Aged Care

² <https://www.culturaldiversity.com.au/documents/inclusive-service-standards//1434-inclusive-service-standards-second-edition-1/file>

³ <https://www.gen-agedcaredata.gov.au/Topics/People-using-aged-care#People%20from%20culturally%20and%20linguistically%20diverse%20backgrounds>

defines CALD as people who were born overseas in countries other than UK, Ireland, New Zealand, Canada, South Africa and USA).⁴

Australia also has a culturally diverse aged care workforce with **21%** of the total direct care workforce identify as being from a CALD background⁵. Personal Care Workers account for **91%** of all CALD direct care workers.⁶

The Centre notes that the number of older people from CALD backgrounds is likely to be higher due to underreporting and barriers experienced in disclosing their cultural identity in the ABS Census. This may be due to adverse experiences with government authorities, fear of getting their visas revoked, lack of access to the Census, language and health literacy barriers and limited opportunity to know how to complete the Census.

Royal Commission and Federal Budget

The Royal Commission into Aged Care Quality and Safety's Executive summary of the final report recognised the gaps in the current aged care system in relation to culturally appropriate care.

*"The existing aged care system is not well equipped to provide care that is non-discriminatory and appropriate for people's identity and experience. We heard about aged care providers that do not provide culturally safe care, that is, care that acknowledges, respects and values people's diverse needs. Across the aged care system, staff are often poorly trained in culturally safe practices, with little understanding of the additional needs of people from diverse backgrounds."*⁷

Some of the suggestions in the report include ensuring the aged care system is designed for diversity, difference, complexity and individuality. Therefore, the Centre recommends that diversity is considered and embedded within all aspects of the Aged Care Quality and Safety Commission.

The Business Case for Diversity, Equity and Inclusion within the Australian Aged Care System

The implementation of Diversity, Equity and Inclusion (DE&I) policy and practices within aged care organisations such as the Commission is becoming more and more pertinent in delivering quality and equitable care.

In order to apply person centred care approaches and to address systemic discriminations, having a considered diversity, equity and inclusion strategy embedded across the whole organisation and enshrined in the organisation's core values and principles is essential in delivering quality of care in line with human rights and equal opportunity. The rationale for having a DE&I plan within the Commission may include moral and social reasons, legislative reasons, ensuring compliance and mitigating risks. For more information about developing a business case for diversity, equity and inclusion visit [the Centre's tip sheet on developing a business case for diversity equity and inclusion](#).

⁴ Department of Health, 2020, Aged Care Workforce Census

⁵ Department of Health, 2020, Aged Care Workforce Census

⁶ Department of Health, 2020, Aged Care Workforce Census

7. <https://agedcare.royalcommission.gov.au/sites/default/files/2021-03/final-report-executive-summary.pdf>

Recommendations from the Centre for Cultural Diversity in Ageing for 3.g) of the Terms of Reference for the Independent Capability Review of the Aged Care Quality and Safety Commission

Recommendation 1

That the Commission's Leadership and Board clearly articulates its commitment to building an environment which responds to consumer diversity and embeds inclusive service provision across the whole organisation.

Recommendation 2

That the Commission demonstrates its commitment to diversity and inclusion by having a diversity and inclusion budget that includes short term and long-term costs of diversity and inclusion innovations and structural changes within the Commission.

Recommendation 3

That the Commission's key organisational documents such as strategic plans and policies demonstrate a commitment to inclusive service provision.

Recommendation 4

That the Commission undertakes an analysis of strengths, gaps, capabilities and readiness to implement and maintain an inclusive approach to service delivery by linking to [the Centre's Inclusive Services Standards Organisations Audit and Planning tool](#) and the [Inclusive Service Standards Online Portal](#).

Recommendation 5

That the Commission creates an organisation wide diversity, equity and inclusion strategy that is approved by the Board/Council.

Recommendation 6

That the Commission builds the capability and skills of its management and staff to work effectively with diversity by having access to up-to-date training, information, tools and resources to effectively respond to the diverse needs of consumers from special needs groups. For example, the module that was co-designed between the Commission and the Centre entitled [Everybody Has a Story: Delivering Culturally Inclusive Care](#) was placed on the Commission's Alis learning platform.

Recommendation 7

That the Commission establishes an aged care diversity advisory group to ensure that ageing, aged care policies and programs across Australia are accessible and inclusive and comply with the diversity requirements of the Aged Care Quality Standards.

Recommendation 8

That the Commission establishes an Older People's Diversity Council to facilitate input from older people from CALD backgrounds into its policies, programs, and services.

Recommendation 9

That the Commission forms partnerships with key stakeholders to review existing service provision guidelines to identify areas to increase inclusion in service provision and organisational policies and procedures from across multiple services. The Commission is linked to diversity and inclusion networks, research, conferences and advisory groups to keep updated on inclusive service provision.

Recommendation 10

That the Aged Care Quality and Safety Commission creates a diversity, equity and inclusion committee and/or and relevant working groups to formally evaluate progress against diversity and inclusion goals.

Recommendation 11

That the Aged Care Quality and Safety Commission works closely with the Centre for Cultural Diversity in Ageing to help support the Commission's strategic approach in monitoring quality of care against the Aged Care Quality Standards and to promote diversity, equity and inclusion principles and requirements across aged care service delivery and governance.

The Centre acknowledges the support of Lotus Consulting Itl in preparing this submission.

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