

7 March 2024

Department of Health and Aged Care
New Aged Care Act Consultation
via email: AgedCareLegislativeReform@health.gov.au

To the Review Committee

RE: Exposure draft – Aged Care Bill 2023

I am writing on behalf of Sacred Heart Mission (SHM), a not-for-profit organisation based in St Kilda, Victoria that has been delivering services and programs for people experiencing homelessness and long-term disadvantage since 1982. SHM is committed to programs that build people's strengths, capabilities and confidence to participate in community life. We are one of Victoria's leading agencies working with people who are experiencing deep, persistent disadvantage and social exclusion, particularly people experiencing long-term homelessness.

We operate a 97-bed residential aged care facility in St Kilda known as Sacred Heart Community and is purpose built to accommodate people with histories of homelessness, mental illness and disadvantage; people requiring 24-hour personal and nursing care due to complex health, social and mental health comorbidities. Sacred Heart Community caters for people who have experienced chronic homelessness, disadvantage and social exclusion, and as a result experience premature ageing and health vulnerabilities. In addition, prolonged social and financial exclusion and isolation create barriers to service engagement, a phenomenon that undermines access to, and trust in health and social services. Under existing legislation, prospective residents aged under 65 years have been denied access to appropriate residential and home-based aged care.

Therefore, we applaud the changes in the *Aged Care Bill 2023 Exposure Draft* (exposure draft) to include provisions for people under 65 who have experienced or are experiencing homelessness to be eligible to access aged care. We support the introduction of a Systems Governor to '*facilitate equitable access to funded aged care services, including in respect of location and individuals who identify with a number of diversity characteristics*'.

Specifically, we applaud Chapter 2, Part 2, Division 2, Section 4: Eligibility determination for an aged care needs assessment (page 51 of exposure draft), which provisions for the System Governor to make an eligibility determination for people who are '*homeless, or at risk of homelessness, and is aged at least 50*'.

However, we remain deeply concerned that in practice, the onus will be placed on individuals and service providers to 'prove' vulnerability for a cohort that is already deeply disadvantaged. Rather, we advocate that any bureaucratic burden be avoided, and the process for determining eligibility, and

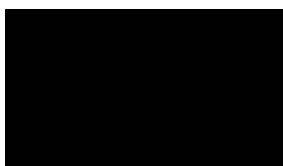
therefore access remain straightforward for consumers and service providers by facilitating astute and efficient assessment processes on presentation of the client. We also advocate that all eligibility determinations are made within a reasonable timeframe, and that the System Governor be responsive to eligibility requests under this provision.

We also advocate that once someone is determined to be eligible due to their experience of homelessness, or is at risk of homelessness, their aged care needs assessment and classification assessment can occur swiftly, and they can access temporary aged care arrangements during this period.

The absence of immediate access to appropriate aged care supports, based on chronological age, risks a diversion of prospective residents into the acute sector and other programs ill equipped to meet their needs. This not only has negative impacts on individuals but creates an additional burden on hospitals and other health services, and community sector organisations like Sacred Heart Mission that may be providing services to these consumers in the interim.

I look forward to further opportunities to discuss the practice and implementation of this legislation once it is enacted by Parliament. As an organisation that has been providing aged care services to people with experiences of homelessness for many years, we look forward to further participating in the implementation of this key legislation that will improve aged care services in Australia, particularly those most vulnerable.

Sincerely



Hang Vo
Chief Executive Officer
Sacred Heart Mission