



26 March 2025

Department of Health and Aged Care
GPO Box 9848
Canberra ACT 2601

Subject: Anglicare Sydney submission on new Aged Care Act Rules - Release 2c

1. About Anglicare Sydney

Anglicare Sydney is a Christian not-for-profit providing care to older people and services to the vulnerable throughout Sydney, the Blue Mountains, Illawarra, Southern Highlands, Central West, New England, North West and Norfolk Island. We have a long history of service provision and a solid commitment to supporting over 4,500 home care clients living in the community and over 7,000 residents in our homes and villages. We have some 5,500 committed and skilled staff plus 1,500 volunteers. In more than 70 years of providing aged care services, Anglicare has been guided by a commitment to quality service provision both clinically and holistically, underpinned by principles of dignity and choice, hope and compassion, supported by highly trained and caring staff.

2. Introduction

Anglicare Sydney welcomes the opportunity to provide feedback on the proposed new Aged Care Act Rules - Release 2c. As a key provider of aged care services, Anglicare Sydney is committed to ensuring that the new regulatory framework supports the delivery of high-quality, sustainable, and accessible aged care services. Our submission highlights areas where additional clarity or modifications are needed to enhance the effectiveness of the proposed Rules.

3. Key issues that need further clarification or amendment

• **Banning Orders (s507)**

While there are no immediate concerns regarding the Rules themselves, we note that the register of banning orders is currently maintained as a PDF document, limiting accessibility and searchability.

The register of banning orders should be enhanced with basic search functions to improve usability and accessibility.

• **Recoverable Amounts (s523(6))**

The provisions for non-recovery of recoverable amounts outline the circumstances where a provider receives payments they are not entitled to. However, the formula for calculating

recoverable amounts should be reviewed to ensure it aligns with financial industry best practices.

Consultation with financial and industry experts should be undertaken to verify the accuracy and fairness of the formula. The Department should provide clear worked examples of the formula's application for better transparency.

- **Grantee Code of Conduct (s268-10)**

The Code of Conduct applies to grantees receiving funding under section 265(1).

Our understanding is that CHSP funding is not made pursuant to section 265(1), and therefore the Grantee Code of Conduct is not applicable to CHSP. It would be helpful if this can be confirmed.

4. Conclusion

Anglicare Sydney appreciates the efforts of the Department in reforming the aged care system through the new Aged Care Act Rules. Our feedback aims to ensure that the regulatory framework is both effective and practical in its implementation. We encourage further consultation with sector representatives to refine these provisions and ensure the best outcomes for older Australians.

We look forward to engaging further on these critical reforms.

Yours sincerely



Simon Miller
Chief Executive Officer