

29 September 2022

Mr Mike Herbert  
Department of Health and Aged Care  
via email [mike.herbert@health.gov.au](mailto:mike.herbert@health.gov.au)

Dear Mike,

### **Aged Care Data Strategy Consultation**

COTA Australia welcomes the opportunity to respond to the initial consultation paper regarding the Aged Care Data Strategy.

The consultation paper rightly links the strategy to recommendations made by the Royal Commission into Aged Care Quality and Safety. However, the suggested content for the vision, purpose and guiding principles seems to respond to only some of the issues raised by the Royal Commission.

It is notable that the suggested vision does not refer to supporting and informing improved health and wellbeing outcomes for older Australians. Outcomes that are measurable should be a key goal. The purpose divides itself between stakeholders but provides no collective statements. Some of the guiding principles require more development and explanation.

Some of the themes missing from the vision, purpose and guiding principles are:

- that data is reliable, accessible, comprehensive, and up to date
- data systems working together and sharing information (interoperability)
- data and data systems are integrated and not fragmented and incomplete
- data gaps are addressed and there are agreed data definitions

In response to the Royal Commission, the Australian Government noted that the objectives of the data governance and National Aged Care Data Asset recommendation may be best achieved through the new Aged Care Act, to commence from July 2023, rather than amending the existing Australian Institute of Health and Welfare Act 1987. It is currently unclear what role the new Act will play in terms of the Aged Care Data Strategy.

The consultation paper states that the scope of the data strategy and that of the data system are interdependent and that it is not an information management strategy or an ICT strategy. However, it is unclear how the strategy will intersect with technology, given that the effectiveness of IT infrastructure and interfaces will be critical to the success of the strategy.

While the paper notes several other relevant government strategies, some which are under development, the link between these strategies and the data strategy is unclear. COTA suggests that a clearer commitment to a single reporting mechanism across the multiple data and IT activities being undertaken across AIHW, DOHAC, ACQSC and other Government agencies is necessary. We note the aged care digital strategy has potentially the most relevant relationship with the data strategy.

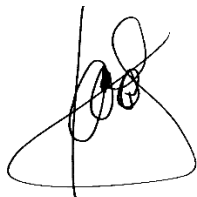
The effectiveness of the technological mechanism collecting data at the service level being transferred into the broader system is very important. Themes raised in the Royal Commission about this include:

- Poor B2G interfaces impede best practice and the capacity to create an open ecosystem of secure data exchange
- The development of software and systems enables automatic reporting by approved providers on mandatory reporting obligations, quality indicators, prudential arrangements, and other responsibilities
- The goal of real-time or near real-time data sharing should be standard within government, with the capacity for approved providers to upload data.

COTA Australia is fundamentally interested in improving health and wellbeing outcomes for older people. For those using aged care services, reliable, accessible, comprehensive, and up to date data should inform this goal.

Thanks for the chance to provide input on this. To discuss our response or related matters please contact David Wright-Howie, Senior Policy Officer, Aged Care Reform by email at [dwright-howie@cota.org.au](mailto:dwright-howie@cota.org.au)

Yours sincerely

A handwritten signature in black ink, appearing to be 'Ian Yates', written over a large, stylized, looped signature line.

Ian Yates AM  
**Chief Executive**