

Submission to the Australian Government Department of the Prime Minister and Cabinet

National Care and Support Economy Strategy 2023

Prepared **by**

COTA Australia

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About COTA Australia

COTA Australia is the peak body representing the almost nine million Australians over 50. For over 70 years our systemic advocacy has been improving the diverse lives of older people in policy areas such as aged care, health, retirement incomes, and more. Our broad agenda is focused on tackling ageism, respecting diversity, and the empowerment of older people to live life to the full.

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Overview

COTA Australia welcomes the opportunity to respond to the Draft National Care and Support Economy Strategy 2023.

Like most Western democracies, Australia's population is ageing. COTA Australia defines older people as those aged 50 years and older. The population aged 50 years and over is projected to grow to 12.1 million by 2041, from an estimated 8.9 million in 2021, an increase of 36 percent.¹

An ageing population generates societal challenges and opportunities. For governments, it can be seen as impacting on economic growth, productivity, inequality within and between generations and the sustainability of public finances. The increasing number of older people adds to budget demand for adequate pensions and care and support services.

The projected ageing of the Australian population is comparatively more gradual than many other countries. In the next 40 years, Korea, Japan, Italy, Germany and Spain are expected to experience rapid increases in the number of older people requiring care and support services. Australia is fortunate to be able to learn from the ageing population experience and approach of other similar nations.

There are many opportunities in having an older population. There are increased numbers of people with extensive and valuable life and vocational experience and skills that can be used to benefit the society and economy.

COTA Australia's focus on people in the second half of life means that we are concerned about both older people needing care and support services and older workers providing these services.

Integral to the national conversation about becoming more carer friendly and strengthening care and support services is tackling ageism and age discrimination. Removing barriers that limit older people from fully participating in Australian economic and social life should be a key goal. Changing the mindset of how we view ourselves as we age can contribute positively to an improved care and support sector and a better society. This involves both government and the community moving away from a paternalistic, "used by date", "unproductive" view of older people to an empowerment, inclusive, "whole of life" participation perspective.

One critical lesson of the many inquiries and reviews of care and support services, including the Royal Commission into Aged Care Quality and Safety, is that listening and responding to the lived experience of people receiving services really matters. A genuine, ongoing challenge is to ensure that they are an essential key stakeholder and participant in the design and delivery of services.

¹ ABS, Population projections, by age and sex, Australia - medium series

COTA Australia supports the overarching themes in the draft Strategy paper. Despite being a significant employer, the care and support sector has been and is undervalued both economically and in other ways. The Measuring What Matters (or wellbeing budget approach) embarked on by the Australian Government could be an important step in changing this value proposition. Addressing inequality and improving social inclusion does have social and economic returns. This should include responding to inequities between and within generations of Australians.

We support the commitment to a single Care and Support regulatory framework that avoids duplication, reduces administrative regulatory burden and encourages more organisations to enter the sector. While this can't be achieved immediately it will ultimately provide a more sustainable and effective goal than piecemeal attempts at harmonisation.

Each of the sectors within the framework have distinct service requirements and characteristics that need to be identified and protected. There are regulatory mechanisms that can be combined but also other policy and service programmatic features that should be maintained. While disability services and aged care services can often provide similar types of services to clients, there are distinct types of disabilities requiring lifelong and specific support. Residential aged care services require nursing expertise to be onsite. Centre based Day Care in early childhood services requires equipment and staffing related to the needs of children and not based on disability or ageing functional decline. Dignity of risk needs to be maintained in aged care but may not be appropriate for early childhood services.

Care work is disproportionately undertaken by women and is often undervalued. This is evident in jobs being low paid and not providing economic security for workers. The National Care and Support Economy Strategy, with its emphasis on better jobs and investment in this important sector, **should contribute to women's economic equality**.

COTA Australia has identified a number of areas where the strategy could be strengthened. These are:

- Considering the future role of volunteers in the care and support economy.
 Volunteers play a significant role in many care and support service organisations and their work should be acknowledged and included as part of the strategy.
- Enabling **local solutions** to be developed. Whilst this is a national strategy, there should be scope for local services and communities to initiate and implement innovative service approaches. This may be particularly important in 'thin market' areas.
- Establishing a comprehensive **definition of thin markets** that includes regionality, diverse and disadvantaged populations and maintaining important specific services and workforce where service choice and resources are low.
- Clarifying where consumer contributions are based on individual capacity to pay (for example in aged care) or family capacity to pay (for example child care). In Aged

Care, complex family dynamics and intergenerational cost and service involvement should not be part of Government regulation. Minister Annika Wells has recently announced the establishment of a TaskForce to consider how aged care is paid for, including consumer contributions. Its findings will need to guide the Strategy on what people pay for in aged care.

 Avoiding a two-tiered approach to care and support where individuals with more resources receive higher quality care would be an inequitable and poor outcome.
 Equity and safety nets to ensure those with limited means to contribute to the costs are essential.

This Strategy represents an important step and shift to tackle entrenched issues across sectors who are often in competition with each other. This has largely been possible through leadership by Prime Minister and Cabinet rather than relying on individual agencies to coordinate their efforts. If Government is serious about the Strategy being further developed, implemented and gaining traction this central leadership will need to continue. COTA Australia recommends that this occurs with a timetable for reform and clear agenda developed following this consultation period.

Quality care and support

Overview

The design of care and support services being led by the needs of those who require care and support, is generally accepted by government and the sector. There are varying interpretations of how this is implemented.

In aged care COTA Australia has advocated for an empowerment model giving control and agency to the people accessing services. Quality care and support means that the right of individuals to make decisions and choices are respected and honoured in program design, guidelines, regulatory settings and models.

A key recommendation of the Royal Commission into Aged Care Quality and Safety was to establish a definition of high quality care as an essential element of a new Aged Care Act. Work is underway on the draft legislation and COTA Australia supports the inclusion of a definition that includes:

- reference to individual self-determination,
- responsiveness to personal needs, aspirations and preferences,
- dignity of risk,
- regular reviews of both clinical and non-clinical service needs with an emphasis on quality of life; and
- enhancement to physical health, mental health and community connection.

What constitutes high quality care should be more than just a minimum base but a constant systemic drive to improve standards and raise the bar. Government policy, funding and regulation should play a fundamental systemic leadership role in this.

Quality of life is equally as important as clinical support in defining high quality care. Empowering older people to live their best life should be a key theme in the definition.

In regulating and designing empowerment service delivery models (described above), it is important that choice and control for individual service users and consumer protection are viewed as equally important and essential. They are not trade offs or ends of a spectrum.

Consumer protections should enhance the capacity of people to exercise independent

Consumer protections should enhance the capacity of people to exercise independent decision-making and choice and control over their care and support services.

This model must include the capacity of people using services to manage or organise services themselves. For example, a consumer may decide to organise and manage their own cleaning or gardening services as part of a Government funded individualised package and budget. Self-management should be viewed as part of a service spectrum ranging from services entirely managed by service providers to services entirely managed by consumers. Consumers should be able to choose different management approaches for different services.

The provision of clear guidance for enacting dignity of risk and the duty of care responsibilities of services is required and could be advanced under the implementation of the Strategy. An informed and documented forum to consider how dignity of risk is enacted will assist in allowing older people to take personal risks and responsibilities and the expectations of the worker/health professional's responsibilities (work health and safety requirements) and duty of care. It facilitates discussion between key stakeholders to moderate an agreed and risk managed approach to care and service delivery. This may consider:

- the utilisation of unregulated workers to perform a task,
- the choices of a consumer that are not aligned with the provider's duty of care, or
- communications and the timeliness of information sharing between service providers and other stakeholders to inform support plan implementation and adjustment when required.
- The limits of a provider, worker, and health professional's duty of care regarding supporting a client's dignity of risk decisions, needs to be clearly articulated in guidance.

The right of older people to self-manage should be a key principle of service delivery and practice in aged care reflected in program guidelines. Self-management should be viewed as a spectrum of decision making. Older people using services may choose to manage some services themselves with others managed by service organisations. Assessments should inform and ascertain whether someone wants to self-manage. Support must be available for those that need assistance to self-manage.

Leadership and a commitment to culture change from both government and service organisations is required to move:

From	То
provider centric	person centric and rights based
stand-alone and fragmented	aligned with the broader care and support sector
uniform approach to service types	embracing a sophisticated risk-based approach that incorporates different types and forms of care and services
limited definition of approved providers	 incorporating individuals, partnerships, and other business structures
 passive and functionary in assessing its requirements of providers 	incentivising excellence, innovation, and continuous improvement

A reform timetable needs to be developed to establish one regulatory system which aligns a Code of Conduct, worker registration and screening processes for Aged Care, Disability Support and Veterans Care.

This is required to stop the current limited, piecemeal 'harmonisation' projects that are underway and shift the focus to a more strategic approach. This approach is likely to encourage existing and new organisations to provide services across the sectors adding to service diversity and choice.

Access to services for all

COTA Australia recommends that the National Care and Support Economy Strategy establish a definition of thin markets.

The National Aged Care Alliance (NACA) proposed the following definition of thin markets:

- regionality where competition may be low due to the cost-of-service delivery across wide geographical areas and/or the additional cost of delivering business in certain locations,
- servicing small diverse/disadvantaged populations in particular areas where competition may be low due to target population size or
- maintaining a **particular service and workforce** where service choice and resources (aka competition) may be low (such as cottage respite care or Geriatricians).²

What constitutes a diverse/disadvantaged group needs to be further defined but it is vital that the care and support needs of First Nations people, Culturally and Linguistically Diverse (CALD) populations and people experiencing homelessness are included as part of improving service access and addressing thin market issues.

The strategy overall should have a stronger focus on enabling locally tailored service solutions across service domains. Cultural safety and trauma informed care should be a principle and skill development requirement for all services.

COTA Australia supports the implementation of integrated commissioning trials to fund cross-sectoral services in thin markets. We would look forward to the results of these trials.

Building a capable, skilled and sufficiently large workforce

Building this workforce will require a range of strategies including attracting more Australians to take on these important roles as well as complementary migration policies.

In all of these strategies the central relationship with the older person being supported must be paramount. Older people regularly tell us how important that relationship is – it is the

² National Aged Care Alliance (NACA) <u>Position Statement: 17 Propositions for Support at Home</u> (October 2022)

only way they experience services. They also regularly share their concern that their workers are adequately paid, trained and supported.

Workforce Culture

Improving the workplace culture should include a focus on improving and enhancing the relationship between workers and people who use care and support services. As aged care moves to a rights basis this is critical. Work needs to be done to ensure that staff understand how the rights basis changes what they do on a day to day basis and with individual clients/residents.

Attracting Australian Workers

Better pay for workers, improved technological systems to address administrative requirements, opportunities for people using services to participate in governance and continuous quality improvement processes, greater training opportunities for workers that enable improved understanding of the needs all contribute to a better environment and play a role in recruiting and retaining workers.

The need for more skilled and qualified care and support workers is well documented. It is important in the recruitment of workers that they not only have the right skills and capabilities but also the right attitude to undertake relational, person-centred work. Organisations should ensure an adequate skills mix to optimise outcomes for people with care and support needs.

Continuity of care and support is vital for good service delivery outcomes. Addressing workforce shortages is definitely a key challenge. Streamlining regulation across the sectors should assist in attracting more care and support workers and organisations.

Specific Workforce Considerations

COTA Australia supports a distinct approach to building up the First Nations care and support workforce developed in partnership with First Nations community organisations. This would include streamlining regulation to enable more flexible service provision for First Nations community controlled organisations and additional training support for First Nations people entering the care and support workforce.

A Complementary Migration Approach

Migration is one strategy that will assist to boost the care and support workforce. Industry or labour agreements or schemes to enable the transition of workers from overseas are important in this context. Government backed schemes should ensure that the rights of migrant workers are protected and the most appropriate workplace arrangements are made. This approach has been successfully applied in Aged Care. Migration should be seen as a complementary, value add strategy to increasing the care and support workforce. Expanding the domestic pool of workers must continue to be a priority.

Volunteers

The National Care and Support Economy Strategy should address the role of volunteers within the care economy. COTA Australia supports the professionalising of the care and support workforce as well as increased assistance and acknowledgment of informal carers, who are often the family and friends of people requiring care and support. However, there should be a distinct place for volunteers in the Care and Support Economy. Many older people gain significant benefits from participating in their community as a volunteer. A pool of volunteers can extend the capacity of organisations to meet community needs. It is important that policies and procedures are established to value volunteers and protect or safeguard them from exploitation. Volunteerism should not be relied on by governments as a major mechanism to solve care and support service challenges. However, volunteerism should be acknowledged and encouraged as part of becoming a more carer friendly nation.

Navigating care and support systems

Older people regularly inform COTA Australia of their difficulties and challenges in navigating service systems, particularly care and support services including aged care.

Reform of aged care, based on the findings of the Aged Care Royal Commission, has begun to address some of these issues. However, difficulties in accessing services is a key challenge across health and community services. Key issues include:

- Insufficient education and awareness raising about care and support services that can act as a preventative measure and empower people in moments of crisis.
- Inconsistent, unclear information about care and support services and inadequate explanation to help people understand how the system works.
- Poor initial, entry point information, advice and support can contribute to inadequate and inappropriate care outcomes.
- Navigation support can be limited to a central online website and telephone approach. There is often a lack of localised, face-to-face community-based services designed to help people navigate the system and connect to services.
- Long waiting lists to access services, a lack of real time availability of services in local areas, and an inability to use one place to book all services can make service navigation difficult.

Government funded programs employing a dedicated navigation support workforce, like the Care Finders program in aged care, should have an impact in addressing some of these issues. However, more action is required to improve the quality and availability of information and expand and improve navigation support services.

COTA Australia is supportive of central, government funded, digital platforms, like My Aged Care, that provide information and advice to people requiring care and support services. These platforms need regular review and updating to improve the quality, timeliness and

accuracy of information and to assess user friendliness. Digital platforms should be complemented by navigation support workforces and programs based at the local and regional level to improve service access.

Support for informal carers and becoming a more carer-friendly nation

Informal carers are a critical part of the care and support service system.

As the draft National Strategy paper mentions, millions of Australians provide significant amounts of unpaid care to family members and loved ones and this has a substantial economic and societal benefit.

The Royal Commission into Aged Care Quality and Safety found that many informal carers do not feel supported and reform was needed to improve information, education and training and support services.

Essential to support for informal carers is access to regular and flexible high quality respite to give carers a break and enhance sustainability of the caring relationship. The provision of respite in aged care and other care and support services remains a challenge.

The implementation of Royal Commission recommendations to link My Aged Care and the Carer Gateway should be reviewed to assess effectiveness and identify further work to support informal carers.

Most primary carers are women, as identified in the Strategy paper. Support for informal carers should be a component of the Government's commitment to women's equality and workforce participation.

Decent jobs

Overview

Older people, aged 50 years and older, include people requiring care and support services, informal carers and paid care and support workers.

In aged care and disability support the workforce is generally older than the broad Australian workforce.

About 44 percent of the Disability Support Workforce is aged 45 years and older. The median age of personal care workers and enrolled nurses in aged care is 40-49 years. In the broad Australian workforce, 39 percent are aged 45 years and over.

The workforce challenges for the care and support sector are considerable. There is a growing gap between the supply of workers and increased service demand, recruiting and retaining workers is difficult due to combinations of factors including low pay, lack of career progression, high staff turnover environment, poor workplace culture and limited training opportunities.

The recent Budget commitment to allocate \$11.3 billion for a 15 percent pay rise for aged care workers, is significant.

Along with attracting younger people to work in the sector, it will also be important that older workers with a commitment to helping people requiring care and support, are encouraged and supported to remain.

As well as maintaining and supporting the current workforce, different approaches need to be adopted to attract new workers. This Strategy is an opportunity to overhaul the image of the care sector to make it more attractive across all ages. There are already good examples in aged care introducing programs into schools and raising the profile of care professions. Developing intergenerational workplaces has considerable value and benefits to all stakeholders in the care and support economy including people needing and using services.

This will rely on many of the factors noted in the draft Strategy paper including improved pay and conditions, better job design, safe working environments and a broader societal recognition of care and support work being implemented.

It may also consider the development of job types that are better suited to some older people that are tailored to their capacities. For example, valued older workers could be retained in the care and support sector undertaking administrative roles rather than direct service work. Support for workers to transition to retirement are also required.

Improving leadership and management capability to ensure better workplace cultures that improve outcomes for people receiving care and workers is critical.

Regardless of what employment engagement model is implement in the care and sector economy, no worker should be worse off in terms of rates of pay based on the way they have been engaged to work. All workers should receive equivalent award wages or higher.

The importance of secure work and the challenges of customer-centred funding models

The current system includes a tension between the principles of job security and flexibility and responsiveness to people who use care and support services. Both principles are incredibly important.

Direct employment is likely to, and should, remain the dominant approach in aged care. However, indirect engagement models (such as independent contractors promoting their services on digital marketplaces) and 'employee-like' forms of work are important to deliver choice for both consumers and workers as we progress to "a more person-centred care and support system" outlined by the draft Strategy.

The Productivity Commission examined the issues around these different models and its October 2022 report concluded that:

- The use of independent contractors in home care often through digital care
 platforms that connect workers directly with consumers is growing from a very
 small base as more older Australians express a preference to self-manage their
 government-funded care package.
- Many older Australians highly value the choice and agency that this model provides, as well as the bespoke nature of the service offerings from platforms that cater for diverse needs.
- Many platform workers highly value the flexibility, autonomy and the potential for higher pay associated with independent contracting — all of which add to their job satisfaction and help keep them in the sector.
- There is a role for platforms as part of the solution for the future of work in aged care.

Given the importance of ensuring older people have choice and that workers are protected COTA Australia supports the development of minimum standards through the Fair Work Commission for indirect employment models. This is an important step to ensure the benefits of 'employee-like' forms of work or indirect engagement models for consumers and workers are maintained whilst identifying and addressing any detrimental impacts. Clear definitions will be needed to determine the scope of the Fair Work Commission's work.

Indirect employment includes gig economy and platform employment models. There are important distinctions between them including whether the individual older person or the

platform determines which registered worker will carry out the task. This can be done through different types of systems:

- individual workers apply or bid competitively to undertake tasks, ranging from skilled to less skilled. Workers maintain online profiles including information about their experience, qualifications, ratings, and feedback. Clients, or customers, choose the worker based on who they think will best meet their needs.
- A work on-demand system where a platform allocates a task directly to a registered, currently available worker. Tasks are usually homogenous, so distinct skills and qualifications are less relevant. Service providers and workers are usually expected to meet a pre-determined minimum standard set by the platform.

The platform worker engagement model in aged care (which could be either or both approaches mentioned above) should consider how flexibility, responsiveness and choice for older people can be maximised without being detrimental to workers. The model should inform workers about their choices for their work arrangements including financial benefits and risks.

Within a reasonable framework:

- Older people should be able to choose their worker, determine what services they need, when they are delivered and develop a relationship with workers to arrange schedules; and
- Workers should be able to develop relationships with their clients, .nd be
 aware of their needs and preferences as well as be informed about rates of
 pay and opportunities for more or less work, advice on superannuation, leave
 arrangements, work and health and safety requirements, insurance, and
 other workplace protections. Workers should know about the benefits and
 disadvantages of choosing to participate in a f a platform worker engagement
 approach.

The availability of indirect, 'gig economy', 'employee-like' employment models in aged care contributes to more older people having the choice to undertake a self-management approach to some or all their care services.

Productive and sustainable

Overview

Australia needs more, and more diverse, care and support services to meet increasing demand and greater diversity of community needs, expectations and preferences.

The care and support service system needs to be able to understand, respect and respond to a diversity of lived experience and life circumstances including varying levels of disability and frailty and different cultural backgrounds and context.

The first principle should be that older people have rights and should be empowered to make choices and decisions about their own care. In addition, they are genuine participants and stakeholders in defining high quality care, service design and continuous quality improvement.

Financing the care and support /service system is a significant challenge for all levels of government and the Australian community. In addressing the challenge, the following key principles should be adopted:

- Equity and fairness Government should continue be the key funder of care and support services
- Individuals contributions should be based on the 'capacity to pay' and not lead to a
 two-tiered system entrenching further disadvantage. Transparency on how it is
 determined what an individual pays and how much government pays and how
 much individuals pay.

The development of a sustainable funding and financing approach must:

- not sacrifice quality and culture
- not diminish the capacity of people to make choices and decisions about the services they use.

Moving towards a **one Care Economy regulation** approach is important. Duplication of regulation processes is a barrier to attraction, retention, efficiency, consistent quality, safety for people receiving care and support, and adds to worker and provider costs and discourages the development of workers and growth of services. Importantly, with the broad care and support sector experiencing workforce and skills shortages, we must design a system that enables workers to be engaged across the relevant systems seamlessly. Decent wages and conditions, along with appropriate skills and training, are measures that support workforce growth, high-quality care, and workforce mobility across the care domains.

There is a real need to define innovation more accurately and expansively. Care and support services should be encouraged and supported to be innovative and look for new and different ways to effectively deliver outcomes. However, the Australian government should

develop a more detailed strategy to define and promote innovation particularly encouraging better approaches to meeting the needs of people requiring care and support.

Well-functioning markets

COTA Australia agrees that a level of competition and contestability is generally required to improve service quality, increase choice for people requiring services, enable innovation and support reasonable prices. Some competitive pressure generally creates an environment that leads to improvements in customer service and quality.

This will not work where there is evidence of significant service constraints or 'thin markets'. As stated above, a robust definition of thin markets should be adopted and include consideration of regionality, small diverse/disadvantaged populations and ensuring a particular service/workforce is maintained. In these circumstances, government will have a strong role in ensuring equity of access to services.

Inequities between care and support sectors should also be monitored and assessed. There are current examples of workers leaving the aged care sector to take up better paid positions in other related sectors. At present, some health professionals can receive more income for working with people in the acute health, mental health, or disability sectors. Some personal care workers earn more in disability than aged care. The impact of direct care workers and health professionals moving to other sectors has a broad impact across all areas and adds an additional disproportionate negative impact on "thin market" populations.

There should be an increased focus in the draft strategy on supporting and encouraging regional and local solutions to issues in the care and support economy. Some of the most effective innovations to improve service delivery occur at the local level. The challenge is to balance the objective of national consistency to ensure that people receive the same quality of service wherever they live with enabling different service approaches to respond to local needs and circumstances.

<u>Productive care and support services</u>

Care and support is relationship based work. More policy thinking is required on what productivity means in the care and support economy and how to measure relationship based work.

The adaptation of labour saving technologies is an important element in ensuring that more time is spent building relationships with people using services rather than on administrative tasks. Governments need to ensure that funding and support is available to increase the use of labour saving technologies across the care and support sectors particularly for small services with less resources.

A care and support economy that encourages and supports innovation. Innovation should not be limited to adopting digital technology, but a range of solutions focused on improving consumer care and outcomes.

A national conversation about long-term sustainability

Commencing a national conversation on the long-term sustainability of care and support economy is important.

This conversation should be shaped by developing key principles. Some broad principles could be:

- Fairness and equity
- Transparency all stakeholders and the Australian community are informed
- Consistency
- Efficiency administratively simple
- Long term intergenerational

The strategy paper asks some initial questions, but more detail should be provided on the framework for discussing both the government contribution through taxation and the contributions of individuals.

The recently established Aged Care Taskforce, chaired by the Minister for Aged Care, to review funding arrangements for aged care, develop fair and equitable options and establish innovation as a key goal, will play an important role in assisting the development of the National Care and Support Economy Strategy.

Key principles should be applied across the care and support sectors. However, there may be distinct funding approaches to the various sector domains. In Aged Care, future sustainability will likely require a blend of taxpayer and co-contributions from people receiving care. Disability has an established insurance scheme which may require reform but not structural change.

There are political elements to this conversation that centred on a range of questions. To what extent do the Australian community value the Care Economy? What is the political appetite or support? How is the value proposition sold and discussed? Does it work across all care and support sector domains? What is the funding package? Is it a combination of taxation and levies? Should a social insurance approach be taken?

The National Care and Support Economy Strategy should outline a timetable and agenda for extending the conversation about sustainable funding. This should involve greater exploration of potential policy proposals and consultation and engagement with the Australian community. It is important to COTA Australia that older people are a key stakeholder group that is consulted. We are willing to assist with this process.