



**NACCHO**

National Aboriginal Community  
Controlled Health Organisation  
*Aboriginal health in Aboriginal hands*

[www.naccho.org.au](http://www.naccho.org.au)

# Carer Leave

**Submission to the Productivity  
Commission**

**August 2022**

## ABOUT NACCHO

NACCHO is the national peak body representing 144 Aboriginal Community Controlled Health Organisations (ACCHOs). We also assist a number of other community-controlled organisations.

The first Aboriginal medical service was established at Redfern in 1971 as a response to the urgent need to provide decent, accessible health services for the largely medically uninsured Aboriginal population of Redfern. The mainstream was not working. So it was, that over fifty years ago, Aboriginal people took control and designed and delivered their own model of health care. Similar Aboriginal medical services quickly sprung up around the country. In 1974, a national representative body was formed to represent these Aboriginal medical services at the national level. This has grown into what NACCHO is today. All this predated Medibank in 1975.

NACCHO liaises with its membership, and the eight state/territory affiliates, governments, and other organisations on Aboriginal and Torres Strait Islander health and wellbeing policy and planning issues and advocacy relating to health service delivery, health information, research, public health, health financing and health programs.

ACCHOs range from large multi-functional services employing several medical practitioners and providing a wide range of services, to small services which rely on Aboriginal health practitioners and/or nurses to provide the bulk of primary health care services. Our 144 members provide services from about 550 clinics. Our sector provides over 3.1 million episodes of care per year for over 410,000 people across Australia, which includes about one million episodes of care in very remote regions.

ACCHOs contribute to improving Aboriginal and Torres Strait Islander health and wellbeing through the provision of comprehensive primary health care, and by integrating and coordinating care and services. Many provide home and site visits; medical, public health and health promotion services; allied health; nursing services; assistance with making appointments and transport; help accessing childcare or dealing with the justice system; drug and alcohol services; and help with income support. Our services build ongoing relationships to give continuity of care so that chronic conditions are managed, and preventative health care is targeted. Through local engagement and a proven service delivery model, our clients 'stick'. Clearly, the cultural safety in which we provide our services is a key factor of our success.

ACCHOs are cost-effective. In 2016, a cost-benefit analysis of the services provided by Danila Dilba to Aboriginal and Torres Strait Islander people in the Greater Darwin region was undertaken by Deloitte Access Economics. The findings demonstrated that each dollar invested in the health service provides \$4.18 of benefits to society. ACCHOs are also closing the employment gap. Collectively, we employ about 7,000 staff – 54 per cent of whom are Aboriginal or Torres Strait Islanders – which makes us the third largest employer of Aboriginal or Torres Strait people in the country.

Enquiries about this submission should be directed to:

NACCHO

Level 5, 2 Constitution Avenue

Canberra City ACT 2601

Telephone: 02 6246 9300

Email: [policy@naccho.org.au](mailto:policy@naccho.org.au)

Website: [naccho.org.au](http://naccho.org.au)

## Recommendations

NACCHO recommends:

1. Amending the NES to better support employees to take on unpaid caring responsibilities for older Australians, including:
  - An entitlement to request an extended period of unpaid carers leave;
  - A broadened definition of carers that includes people caring for family members (both immediate and extended family) and close friends or community members. This would apply to requests for both paid and unpaid leave and flexible working arrangements; and
  - The right to appeal any decisions by an employer to refuse requests for flexible working arrangements and/or extended unpaid carers leave.
2. Embedding support for carers into the new aged care system by:
  - Proactive and early identification of carers and their needs from My Aged Care, care finders and assessment services;
  - A holistic approach to assessing clients that includes incorporating carer needs;
  - A new rights based Aged Care Act that recognises the rights of informal carers to access supports; and
  - Improved integration between the Carer Gateway and My Aged Care and easier access to carer resources and support including Aboriginal and Torres Strait Islander specific resources.
3. Improving aged care support services for carers including:
  - Improving access to respite care, including culturally appropriate and trauma informed respite care for Aboriginal and Torres Strait Islander people delivered by Aboriginal Community Controlled Organisations; and
  - Improving access to free support services including assistive technologies and home modifications, equipment and aids, centre-based care, transport and social activities.
4. The government review the rate of the Carer Payment and Carer Allowance and the process of applying for them and how to support carers that wish to undertake part-time work while caring

## Introduction

NACCHO welcomes the opportunity to provide a submission on the *Carer Leave Issues Paper* (Issues Paper) produced by the Productivity Commission.

Aboriginal and Torres Strait Islander carers make a significant contribution to the care of Aboriginal and Torres Strait Islander elders and provide a wide range of unpaid care and support. Many Aboriginal and Torres Strait Islander people take on caring roles in the community and carers account for 12.4% of the Aboriginal and Torres Strait Islander population, compared to 10.5% of the non-Indigenous population<sup>1</sup>. The actual number of carers is likely to be higher as many Aboriginal and Torres Strait Islander people see caring as a natural part of their culture and may not identify formally as a carer. Aboriginal and Torres Strait Islander carers are also more likely to be caring for more than one person, spend more hours per week on caring, and experience financial stress<sup>2</sup>.

## National Agreement on Closing the Gap

In July 2020, the Australian Government, all state and territory governments, and the Coalition of Peaks signed the *National Agreement on Closing the Gap* (National Agreement). The reforms and targets outlined in the National Agreement seek to overcome the inequality experienced by Aboriginal and Torres Strait Islander people, and achieve life outcomes equal to all Australians. All governments have committed to the implementation of the National Agreement's four Priority Reform Areas, which seek to bring about structural change to affect ways in which governments work with Aboriginal and Torres Strait Islander organisations, communities and individuals. The four Priority Reforms are:

### **Priority Reform Area 1 – Formal partnerships and shared decision-making**

This Priority Reform commits to building and strengthening structures that empower Aboriginal and Torres Strait Islander people to share decision-making authority with governments to accelerate policy and place-based progress against Closing the Gap.

### **Priority Reform Area 2 – Building the community-controlled sector**

This Priority Reform commits to building Aboriginal and Torres Strait Islander community-controlled sectors to deliver services to support Closing the Gap. In recognition that Aboriginal and Torres Strait Islander community-controlled services are better for Aboriginal and Torres Strait Islander people, achieve better results, employ more Aboriginal and Torres Strait Islander people and are often preferred over mainstream services.

### **Priority Reform Area 3 – Transformation of mainstream institutions**

This Priority Reform commits to systemic and structural transformation of mainstream government organisations to improve to identify and eliminate racism, embed and practice cultural safety, deliver services in partnership with Aboriginal and Torres Strait Islander people, support truth telling about agencies' history with Aboriginal and Torres Strait Islander people, and engage fully and transparently with Aboriginal and Torres Strait Islander people when programs are being changed.

---

<sup>1</sup> Carers Australia (2022). *Aboriginal and Torres Strait Islander Carers*. Retrieved from: <https://www.carersaustralia.com.au/about-carers/aboriginal-torres-strait-islander-carers/#:~:text=12.4%25%20of%20the%20Aboriginal%20and,language%20and%20cultural%20barriers>

<sup>2</sup> Carers Australia NSW (2020). *202 National Carer Survey: Aboriginal and Torres Strait Islander Carers*. Retrieved from: [2020 Carers Survey Aboriginal and Torres Strait Islander Carers](#)

#### **Priority Reform 4—Sharing data and information to support decision making**

This Priority Reform commits to shared access to location-specific data and information (data sovereignty) to inform local-decision making and support Aboriginal and Torres Strait Islander communities and organisations to support the achievement of the first three Priority Reforms.

#### National Employment Standards

NACCHO supports the recommendation of the Royal Commission into Aged Care Quality and Safety (Royal Commission) to provide an additional entitlement to unpaid carer's leave under the National Employment Standards (NES) (recommendation 43). Carers should be able to access unpaid leave for extended periods of time to care from older Australians. Having access to unpaid leave provides carers with stability and the option to return to the workplace when their caring role ceases or declines. Access to flexible working arrangements also allows for carers to request changes to hours, patterns of work and locations of work. Although carers currently have this entitlement under the NES, there is no mechanism to appeal a refusal from an employer. The NES should be amended to give employers more recourse when their requests is not accepted.

The definition of carers should also be broadened to allow for a range of circumstances including where:

- the older person has a preference for an extended family member or friend to provide care instead of immediate family;
- the older person does not live near their immediate family, but extended family or friends live nearby and can provide care;
- the cultural definition of family is broader than immediate family and encompasses extended family and/or other community members (eg: Aboriginal and Torres Strait Islander people); and
- the older person does not have an established relationship with their family and has friends who form a 'family of choice' (eg: people who identify as LGBTQI+).

NACCHO also supports extending any unpaid carer leave and flexible work entitlements to those caring for people with a disability, chronic illness and/or terminal illness.

While increased access to extended unpaid carers leave may lead to increased expenditure on carer payments and support services, this would be significantly offset by the savings gained from unpaid caring hours, increased health and wellbeing of older Australians and delayed entry into residential aged care. An increase in unpaid carers also allows more older people to remaining living in their homes and communities and for those in rural and remote areas ensures they do not have to move away from family and Country to access aged care services. Aboriginal and Torres Strait Islander Elders play a crucial role in community including preserving traditional knowledge and language, building inter-generational relationships, strengthening social cohesion and community resilience and helping to tackle community issues including health, education, racism and oppression.

**NACCHO recommends** amending the NES to better support employees to take on unpaid caring responsibilities for older Australians, including:

- An entitlement to request an extended period of unpaid carers leave;

- A broadened definition of carers that includes people caring for family members (both immediate and extended family) and close friends or community members. This would apply to requests for both paid and unpaid leave and flexible working arrangements; and
- The right to appeal any decisions by an employer to refuse requests for flexible working arrangements and/or extended unpaid carers leave.

### Further Support for Carers

NACCHO supports the recommendation of the Royal Commission that the Australian Government improve services and supports for informal carers (Recommendation 42). Carers must be recognised as a critical element in the care of older people and supported to access information, supports and services. The current system relies on self-identification from carers, many of whom do not identify as carers or know where to go for support. For Aboriginal and Torres Strait Islander carers there may also be a reluctance to access services due to language and cultural barriers, lack of culturally appropriate services and a distrust of institutional care due to personal and historical experiences of systemic and interpersonal racism. The new aged care system must be proactive to the needs of carers and identify them early in the assessment process. There is also a need for more culturally appropriate carer resources for Aboriginal and Torres Strait Islander carers, including access to counselling services and support groups.

**NACCHO recommends** embedding support for carers into the new aged care system by:

- Proactive and early identification of carers and their needs from My Aged Care, care finders and assessment services;
- A holistic approach to assessing clients that includes incorporating carer needs;
- A new rights based Aged Care Act that recognises the rights of informal carers to access supports; and
- Improved integration between the Carer Gateway and My Aged Care and easier access to carer resources and support including Aboriginal and Torres Strait Islander specific resources.

### Increased Aged Care Supports

The 2020 National Carers Survey found that carers are highly socially isolated with 70.3% of Aboriginal and Torres Strait Islander carers being either highly socially isolated or having only low levels of social support (compared with 55.8% of non-Indigenous carers)<sup>3</sup>. Respite provides crucial support to carers to allow them to take a break from their caring role to participate in community and social activities and manage their mental health and wellbeing. However, the Royal Commission found that many older people and their carers do not receive the quality and level of respite care they need. Carers find it difficult to navigate the My Aged Care and Carer Gateway systems to access the respite they need.

NACCHO supports the recommendation of the Royal Commission (Recommendation 32) to introduce a respite support category that provides a greater range of high-quality and culturally safe respite services. Aboriginal and Torres Strait Islander carers must be able to access culturally appropriate and trauma informed respite services in their own communities and with people that understand their

---

<sup>3</sup> Carers Australia NSW (2020). 202 *National Carer Survey: Aboriginal and Torres Strait Islander Carers*. Retrieved from: [2020 Carers Survey Aboriginal and Torres Strait Islander Carers](#)

needs. This is best achieved by funding Aboriginal Community Controlled Organisations (ACCOs) and Aboriginal and Torres Strait Islander Health Organisations (ACCHOs) to deliver respite services, in line with Priority Reform Area 2 which commits to building the Aboriginal and Torres Strait Islander community-controlled sector. This particularly relevant for ACCHOs who currently deliver comprehensive primary health care and have capability to undertake this work both clinically and culturally.

NACCHO further supports the recommendations of the Royal Commission) to introduce:

- an assistive technology and home modifications category that provides free access to assistive technology, home modifications and aids and equipment (Recommendations 34 and 125); and
- a social supports category that provides free social support including social activities, transport and centre-based day care (Recommendation 33).

Assistive technology, home modifications and equipment can help promote independence for older people undertaking daily living tasks, reduce safety risks and reduce carer burden. Access to transport, centre-based day care and social activities reduces carer burden, provides 'down time' for carers and gives the older person access to activities that will improve their social isolation and health and wellbeing. One of the contributing factors to financial stress for carers is the costs of care including medicine, transport, health services, support services, equipment and insurance<sup>4</sup> so it is crucial these support services are available free of charge.

**NACCHO recommends** improving aged care support services for carers including:

- Improving access to respite care, including culturally appropriate and trauma informed respite care for Aboriginal and Torres Strait Islander people delivered by ACCHOs; and
- Improving access to free support services including assistive technologies and home modifications, equipment and aids, centre-based care, transport and social activities.

### *Carer Payment/Allowance*

The 2020 National Carers Survey found that over half of all of carers (50.7%) have suffered financial stress with 14.4% of respondents experiencing severe financial stress<sup>5</sup>. The rates of financial stress are even higher for Aboriginal and Torres Strait Islander carers with 70.5% experiencing financial stress and 29.5% experiencing severe distress<sup>6</sup>. Many carers rely on access to income support payments, usually the Carer Payment or the Carer Allowance, which often do not meet the high costs of caring for an older person. Additionally, carers are time poor and suffer high levels of psychological distress so struggle to navigate the complex and timely process of applying for payments. Some carers may wish to continue part-time work while caring but then lose access to the Carer Payment or Carer Allowance and other income support such as rental assistance. The Carer Payment and Carer Allowance should incentivise those carers that can continue their participation in the workforce rather than punish them. Continued workforce participation leads to increased health and wellbeing for

---

<sup>4</sup> Carers Australia NSW (2020). *2020 National Carer Survey: Summary report*. Retrieved from: [Summary Report \(carersnsw.org.au\)](https://www.carersnsw.org.au/summary-report)

<sup>5</sup> Carers Australia NSW (2020). *2020 National Carer Survey: Summary report*. Retrieved from: [Summary Report \(carersnsw.org.au\)](https://www.carersnsw.org.au/summary-report)

<sup>6</sup> Carers Australia NSW (2020). *202 National Carer Survey: Aboriginal and Torres Strait Islander Carers*. Retrieved from: [2020 Carers Survey Aboriginal and Torres Strait Islander Carers](https://www.carersnsw.org.au/2020-national-carer-survey-aboriginal-and-torres-strait-islander-carers)



carers, supports independence, upkeeps skills and knowledge and allows for easier re-entry to fulltime work.

**NACCHO recommends** the government review the rate of the Carer Payment and Carer Allowance and the process of applying for them to improve access for Aboriginal and Torres Strait Islander people in particular. The review should also explore how to support carers that wish to undertake part-time work while caring.