



Submission to the Inquiry into Aged Care Service Delivery

Housing for the Aged Action Group

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About HAAG

Housing for the Aged Action Group (HAAG) is a member-based, community organisation specialising in the housing needs of older people. HAAG has over 900 members across Australia actively working towards achieving housing justice. Established over 40 years ago as a grassroots movement, HAAG has developed a robust service delivery arm in Victoria and has a strong presence in advocacy for older people experiencing housing and homelessness related issues across Australia. During the 2024-25 financial year, HAAG supported over 1,800 older Victorians.

In 2016, HAAG commenced work to research the depth of housing and homelessness issues for older people nationally, and since that time have worked with services, people with a lived experience, research and advocacy bodies across Australia. This positions us uniquely as one of the few organisations who can provide detailed insight into the impact of increasing housing insecurity on ageing and aged care provision.

HAAG welcomes the opportunity to provide input into the Senate Community Affairs Reference Committee [inquiry into Aged Care Service Delivery](#). This submission is based on our experience delivering housing and related support services to older people in Victoria (including Care Finder), and research and lived experiences of older people experiencing housing stress or homelessness across Australia.

Key message

The new [Support at Home](#) program, implemented in response to the Royal Commission into Aged Care Quality and Safety, aims to ensure ‘a simpler and more equitable system for older people that helps them to stay at home for longer’. While HAAG supports this vision, we hold grave concerns about whether the implementation of the program will meet the needs of older people in precarious housing.

The government's decision to delay the Support at Home program until 1 November 2025 while withholding additional Home Care Packages comes at a critical time during an unprecedented housing crisis, with 42% of older people over 55 not owning their homes and increasing numbers entering retirement while renting privately. This creates a perfect storm of vulnerability where older renters are increasingly unable to afford the home care supports they need to age in place with dignity and security, risking deteriorating health, premature admission to residential aged care, and premature death.

Addressing the Terms of Reference

In addressing the terms of reference we note that:

- Older people on the aged care pension living in private rental or in precarious housing are especially vulnerable to delays in receiving support at home due to poor health, poor quality housing, and cost of living pressures.
- The Commonwealth Home Support Programme is already experiencing significant delays and lack of service provision, and will not meet increased demand.
- Our service has experienced considerable issues with the implementation of the single assessment system.

These issues will be explored in further detail in our submission.

Recommendations

1. **Implement automatic and ongoing hardship provisions to those who are renting privately and on the full pension.**
2. **Include consideration of rent in the Support at Home income and assets test for people who are renting privately.**
3. **Create a new interim package program that would support older people experiencing or at risk of homelessness while they are waiting for assessment and services.**
4. **Provide greater security of tenure for older renters to enable them to age in place with dignity, by ensuring:**

- a. Property owners approve property modifications identified under an Aged Care Assessment in a timely manner.
- b. Requesting modifications does not place a tenancy in jeopardy.
- c. Implementing minimum energy standards

Context

Australia's aged care system – including supports provided in the home - is based on the assumption that people own their home when they retire. For those who do, they have a stable home, housing costs are limited, and they have the autonomy to make changes and modifications to their property.

However, this is not the case for increasing numbers of older people. HAAG research has revealed that is not the reality for 42% or more older people over 55 years, with increasing proportions of older people renting privately, or retiring with a mortgage.¹ With the current housing crisis, the number of older people renting privately into retirement will only continue to increase.

Increasing housing insecurity has numerous consequences that impact on older people's ability to access in home aged care supports. The private rental sector in particular does not provide security of tenure, affordability or accessibility for older low-income households.

- Escalating rents means older people are paying a significant proportion of their income on rent, leaving little available for other essential costs – food, medications, utility bills, etc.
- Older renters in the private rental market live in constant anxiety about their housing, particularly those on income support, due to the limited protections available.
- A lack of accessible housing, and a lack of funds to modify homes to make them more accessible, means that mobility issues can push people into homelessness.
- There is little or no incentive for landlords to upgrade or install ramps and handrails to make housing more accessible.
- Many older renters are afraid of asking for home modifications due to the fear of rent increases that may result from it or being asked to vacate the home.

These challenges are particularly marked for older people experiencing deep and persistent disadvantage. These are older people who suffer from the effects of poverty, trauma and/or social isolation, homelessness, and anyone with reduced capacity to live independently or without informal support/s from family, friends or carers. We estimate that there are over 18,000 older

¹ <https://www.olderrenters.org.au/publications/ageing-in-a-housing-crisis-older-peoples-housing-insecurity-homelessness-in-australia>

people in Australia experiencing this type of disadvantage who cannot readily access aged care or who are not welcome in many services.²

Single older women are amongst the most marginalised groups in terms of their access to safe, affordable housing and often find informal housing arrangements that leave them more vulnerable to homelessness and further harm.

Ultimately, if older people are unable to receive the supports they need to remain safely at home, they risk deteriorating health and wellbeing, premature admission to residential aged care, and premature death.

Background

The [Care Finder program](#) provides support for vulnerable older people to interact with My Aged Care, access aged care services and access other relevant supports in the community. Its predecessor, the Assistance with Care and Housing program explicitly acknowledged the importance of the housing support nexus to enable older people to age well. However, this focus has been lost in the transition to Care Finders, where most providers focus on linkages to aged care services, despite the importance of housing to ageing in place.

Special needs groups under the Aged Care Act

People who are homeless and at risk of homelessness are recognised under the existing Aged Care Act and the exposure draft to the new Act as being a “special needs” group requiring additional support. Eligibility for people who are homeless or at risk of homelessness is 50 years and older due to premature ageing. A recent report by [The Guardian](#) found that people who are homeless in Australia are dying at age 44 on average.

Assistance with Care and Housing Program

Established in the mid-1990s the Assistance with Care and Housing (ACH) program was at the time, and until December 2022, an innovative program. Not only did it provide a homelessness response in an aged care framework, and act as a point of intermediation between the homelessness support system particularly the SHS system and aged care, but it also acknowledges the importance of the housing support nexus to enable older people to age well.

Care Finder

In January 2023, the Assistance with Care and Housing (ACH) program was transitioned to the new care finder program, administered by Primary Health Networks. Care finders are to ‘provide specialist and intensive assistance to help people within the care finder target population to understand and access aged care and connect with other relevant supports in the community’.

² https://www.older tenants.org.au/sites/default/files/joint_subm_royal_comm_aged_care_may2020.pdf



Primary Health Networks were to 'support a transition of the Assistance with Care and Housing (ACH) program (with the exception of hoarding and squalor services) to the care finder program', with all existing ACH providers offered a care finder contract with a quarantined funding amount until 2025. Transition arrangements were to ensure continuity for existing ACH clients.

Although ACH providers were to operate as care finders from January 2023, the aim of the new care finder program was to ensure that the recognised value of the program was to be maintained.

The Care finder policy guidance states:

As part of their functions, care finders may provide specialist and intensive assistance to help people who are homeless or at risk of homelessness to connect with appropriate and sustainable housing and other supports in the community targeted at avoiding homelessness or reducing the impact of homelessness. When transitioning to the care finder program, ACH providers can continue to provide a specialist focus on clients who are homeless or at risk of homelessness.

Hardship provisions for Age Care Packages and Support at Home.

Existing hardship arrangements will carry through to Support at Home, however once these expire, or for new recipients, they will need to (re)apply for a new fee reduction supplement.

Current hardship provisions for Home Care Packages are onerous – a 40-page form, many evidence requirements, and the need to have income and assets reassessed – and may only result in very short term fee relief (1-2 weeks). The result is that older people are unable to afford the basic services they need, such as meals, domestic assistance, personal care (showering, dressing) and assistance with shopping.

Private renters on the Age Pension doing it tough

There is significant confusion about the impact of the Support at Home pricing structure, and concerns that it may increase costs for older people. In the new structure 'Clinical Supports' will be funded in full by the government, and this is welcome. 'Independence' and 'Everyday Living Services' will attract means tested contributions, which will be based on an assessment of income and assets. However, if these are not considered in conjunction with fundamental expenses, such as rent payments, these costs are likely to be out of reach for many older people renting privately.

For those renting, and already experiencing financial hardship, this may mean they go without the vital services they need to age well at home, such as meals.

HAAG recommends that for people who are renting privately:

- the Support at Home income and assets test also includes consideration of rent
- Hardship provisions should be automatically applied to those who are renting privately and on the full pension.
- These automatic hardship provisions should be ongoing, or only subject to review if a person's income and assets change, or if their housing improves (for example, moving into public housing).

Recommendation 1: Implement automatic and ongoing hardship provisions to those who are renting privately and on the full pension.

Recommendation 2: Include consideration of rent in the Support at Home income and assets test for people who are renting privately.

CASE STUDY 1

69-year-old widower Fred* was unable to pay rent after he had spent his superannuation to pay medical and palliative care costs for his late wife, and was getting further and further behind on his rent. He had been issued a Notice to Vacate and order of possession.

Through HAAG's support and advocacy the eviction was cancelled, and Fred was being supported to find a more affordable private rental property. He is also on the Victorian Housing Register for social housing.

Fred was registered with My Aged Care (MAC) and assessed for Commonwealth Home Support Service assistance. Through this he'd been receiving meals, but cancelled them as could not afford the client contribution fee. He was approved for gardening assistance to mow the lawns, but there were no providers.

HAAG contacted My Aged Care (MAC) for Fred to see if he could be reassessed for a Home Care Package so that the meals could be more heavily subsidised, and he could get the other services that he needs like home maintenance and gardening and also to get assessed for residential respite care in case he was evicted. However, MAC advised that because Fred is otherwise independent he would not be eligible for either of these assessments.

HAAG is concerned that without these basic services, in conjunction with his acute housing stress, Fred's health will deteriorate, potentially leading to increased service need, hospitalisation or premature move into residential aged care.

*Names changed for de-identification

Need for a new interim package to support older people

There is a need for a specialist service that provides a greater level of support for older people who are experiencing or at risk of homelessness, beyond what is currently provided by care finder and Support at Home. HAAG's *Home at Last* service is one such model that has been proven to be effective in supporting this cohort.³ This service could be expanded to include an 'interim' package program.

A new interim package program⁴ would support older people experiencing or at risk of homelessness while they are waiting for assessment and services. This program would enable selected providers to support at-risk older people to access appropriate housing and wrap-around services and address their aged care needs. As with *Home at Last*, the importance of obtaining safe and secure housing in order to receive home care will be acknowledged and addressed.

Interim packages should remain in place until the person receives an appropriate Home Care Package/Support at Home, or other appropriate aged care supports. Providing assistance with housing and holistic supports would reduce the use of residential aged care until it is absolutely necessary.

Interim packages would provide specialist short-term case management support for older people with significant barriers, providing more comprehensive assistance than the 'linking' service of care finder and filling the existing gap in service delivery.

Making interim packages available through a limited set of specialist providers (and for a defined cohort of consumers) would ensure that the program is appropriately targeted and limit its cost.

The additional funding provided under any new program could be consistent with the Short-Term Restorative Care (STRC) Program. However, unlike this program, it should not be time limited, given the variable wait times for services depending on individual circumstances and locations.

The interim package program could be under Support at Home, and receive referrals from care finder, My Aged Care, aged care assessors or other community services.

Recommendation 3: Create a new interim package program that would support older people experiencing or at risk of homelessness while they are waiting for assessment and services.

³ Ernst & Young Home at Last Economic Appraisal November 2021

https://www.olderrenters.org.au/sites/default/files/home_at_last_economic_appraisal_-_final_report_-_november_2021.pdf

⁴ This was one of the recommendations for older people experiencing deep and persistent disadvantage, in the Joint Submission to the Royal Commission into Aged Care Quality and Safety co-authored by HAAG, Jesuit Social Services, Sacred Heart Mission, Catholic Social Services, Vincent Care, St Mary's House of Welcome, Brotherhood of St Laurence

https://www.olderrenters.org.au/sites/default/files/joint_subm_royal_comAgm_aged_care_may2020.pdf

CASE STUDY 2

Jose* was informed about the My Aged Care (MAC) process and registered online. However, the online registration was unsuccessful and he asked our Care Finder service to contact MAC to confirm his details. The HAAG Care finder needed to visit Jose again, so that together they could make the phone call to MAC. The registration and screening were completed over the phone, and Jose was placed on the waiting list for an assessment.

Weeks of waiting for the assessment call, turned into three months. There was no phone call, no letter, and no update, despite the Care finder calling to follow up. During one follow up call, we were informed that someone had reportedly tried to contact Jose twice, and when he didn't answer, his referral was withdrawn from the waiting list. Neither Jose nor the Care finder were informed of this.

This meant that three months of waiting, follow-up and preparing were erased and we had to restart the entire process. We completed a second phone screening and were told to expect an assessment call within two to six weeks. But again, weeks passed with no contact. This time, aware of what had happened before, we were more proactive. After two weeks, we called MAC again. They referred us directly to the assessment organisation.

When we spoke to the organisation, they explained that the timeframes provided by MAC do not reflect their current capacity and are not accurate. They confirmed that Jose was still on the waiting list, waiting for a worker to be assigned, and that assessment wait times were unpredictable. They also advised that he must be very careful to answer the phone, as they only attempt contact twice in a row from a private number.

Through all of this, Jose has remained patient, however it is clear to see the growing frustration and confusion the couple have experienced in their different interactions with the MAC system.

Jose is still waiting for support and continues to rely heavily on his partner.

*Names changed for de-identification

CASE STUDY 3: WORKER TESTIMONIAL

Clients who can't afford the co-contribution for services, particularly those residing in private rentals are often making decisions about which approved services to prioritise. Where possible, the client has advocated for a fee waiver or reduction.

Wait times for assessments and packages continue to be lengthy, resulting in delays for clients to receive the services they require to remain living at home. The Care finder has tried to mitigate this by providing up to date information about wait-times to accurately inform clients, as well as to advocate for client need.

Communication between MAC, assessors and Care finders continues to be inconsistent, with many assessors not contacting the Care finder, despite being listed as agents.

Rental protections needed for older tenants to enable them to age in place with dignity

To enable older renters to age in place with dignity a range of reforms are required:

- Greater security of tenure
- Limits to rent increases
- Enforceable requirements for property owners to approve property modifications identified under an Aged Care Assessment in a timely manner
- Legislation to ensure that requesting modifications does not place a tenancy in jeopardy
- Minimum energy standards to ensure that renters can have a home that keeps them healthy and reduce costs, such as insulation and heating and cooling appliances. Older renters on low incomes may not have the financial capacity to purchase heating or cooling equipment to make their housing habitable where landlords fail to do so.
- Ensuring compliance with 2022 National Construction Code requirements for liveable housing design to improve the suitability of new Australian homes for people with reduced mobility. Accessible design is crucial for meeting the needs of people with reduced mobility, including older Australians.

Recommendation 4: Provide greater security of tenure for older renters to enable them to age in place with dignity

CASE STUDY 4

Arnold* is a 69 year old male with physical and mental health issues including dementia, chronic pain and uses a walking stick. Arnold's wife is his full-time carer. She manages her own health issues as she is not eligible for My Aged Care services because of her age.

After the Arnold was assessed, he was approved for a Level 4 Home Care Package, but they reported difficulty navigating and selecting a suitable provider due to experiencing housing stress and now homelessness.

The couple had been privately renting for several years before receiving a Notice to Vacate. They spent months searching for another suitable rental but were not approved for any. The majority of rentals had a shower over the bath which is unsuitable for Arnold's mobility needs. By the time they were expected vacate the property, the couple had no place to call home and stayed with a friend for a week before moving to a motel. They have exhausted all their savings and now face living on the street. Arnold's Home Care Package Level 4 approval expires in 30 days, and the couple do not know what to do next. They have since been referred to a community service for ongoing support.

*Names changed for de-identification

CASE STUDY 5

85 year old Rodney* lives in the bungalow behind a suburban house. He was issued a Notice to Vacate when the property sold, but the new owners agreed that he could stay a further six months. He does not have a formal lease.

Rodney has been living independently all his adult life but is now experiencing some mobility and cognitive issues which are impacting on his ability to live independently. He never married and has no children. He has one friend who provides some support for him, but his friend was struggling to find the housing and care that Rodney needs.

He is on the waiting list for social housing – the Victorian Housing Register – and in the meantime his friend has helped Rodney apply for private rentals. However, they have not been successful in securing a property and he can't afford any sort of retirement village.

Rodney was open to the idea of exploring residential aged care options, and HAAG assisted him to register with My Aged Care and have an aged care assessment, which approved him for residential aged care and home care package. He visited a local residential aged care facility and was keen to put his name down on their waitlist. To do so (or to access Home Care Packages) he needed to complete an income and assets test, and needed assistance from a Centrelink Aged Care Specialist Officer (ACSO) to do so. Neither service can commence until this form is processed otherwise Rodney would incur full fees without the government subsidy, which he cannot afford.

However, ACSO availability is severely limited – many Centrelink offices no longer have these roles, and the phone line message says 'we are busy call back later' – delaying Rodney's access to vital services.

*Names changed for de-identification