

ABN 19 659 150 786

1 September 2023

Professor Mary O’Kane AC
Chair
Universities Accord Panel

Dear Professor O’Kane AC and the Australian Universities Accord Panel,

RE: Australian Universities Accord Interim Report

The Aged and Community Care Providers Association (ACCPA) welcomes the Australian Government’s commitment to an Australian Universities Accord to drive reform in Australia’s higher education system. ACCPA also welcomes the opportunity to provide a response to the *Australian Universities Accord Interim Report* (Interim Report).

ACCPA is the national Industry Association for aged care providers offering retirement living, seniors housing, residential care, home care, community care and related services. We work to unite aged care providers under a shared vision to enhance the wellbeing of older Australians through a high performing, trusted and sustainable aged care sector.

The aged care sector is currently experiencing significant workforce shortages. Of particular concern to ACCPA is the shortage of Registered Nurses in aged care. Aged care providers are struggling to maintain competitive salaries and conditions compared to other sectors, and many people are leaving the industry due to poor pay, stress and increasing administrative burden.¹ A Department of Health and Aged Care (Department) brief released under Freedom of Information shows the Department estimates that there will be a shortage of 11,800 Registered Nurses in 2023-24. The Department also anticipates that the new 24/7 Registered Nurse requirement that came into effect on 1 July 2023 and the care minutes requirement which will come into effect from 1 October 2023 ‘may place additional pressure on an area’s existing workforce shortages – particularly on regional and rural areas.’²

In addition to Registered Nurses, the aged care sector continues to feel the pressures of health workforce shortages across allied health (including physiotherapists, occupational therapists and podiatrists), as well as other health workers such as geriatricians, general practitioners, counsellors, pharmacists and dentists. Other supporting services, such as social work, are also in high demand.

ACCPA concurs with the Interim Report’s position that without urgent action to address these labour shortages, ‘as Australia’s population ages, a greater number of jobs requiring higher education will be left vacant, leading to skills shortages that need to be addressed through domestic upskilling and migration.’³ We note that existing shortages have necessitated urgent migration measures such as visa streamlining and introduction of new visa classes to support international recruitment, and that further work is underway through the Migration Review to consider what role migration can play in the future. Future workforce needs will require a mix of international and domestically skilled graduates, including those who enter aged care through traditional paths, such as Bachelor’s degrees in nursing, as well as upskilling the existing aged care workforce.

¹ For further discussion, see ACCPA, *It’s still time to care about aged care: Financial Sustainability Summit Issues Paper*, August 2023, <https://www.accpa.asn.au/wp-content/uploads/2023/08/ACCPA-Financial-Sustainability-Summit-Issues-Paper-August-2023.pdf>

² Department of Health and Aged Care, *Senate Committee: Community Affairs Budget Estimates 2022-2023 [Hot Issues Brief]*, Document 15 of FOI 4178, p.1, <https://www.health.gov.au/sites/default/files/2023-02/foi-4178-release-of-documents-hot-issues-briefs.pdf>

³ Australian Government, *Australian Universities Accord Interim Report*, p.30, <https://www.education.gov.au/australian-universities-accord/resources/accord-interim-report>

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Demand for aged care services is also increasing due to Australia's ageing population. Around 16% of Australians are currently aged 65 or older.⁴ The *2023 Intergenerational Report* projects that the number of Australians over the age of 85 will more than triple over the next 40 years, to more than 3.5 million in 2062-2063.⁵ People over 85 are the largest users of aged care, and Australia will need a qualified and skilled workforce to meet this rapidly increasing demand.

This Review provides a valuable opportunity to consider how the higher education system could help address the workforce issues affecting the aged care sector and, in particular, increase the supply of Registered Nurses in regional, rural and remote areas where these shortages are most acute.

Feedback on the Interim Report

ACCPA strongly supports this Review and consideration on how to provide better incentives and financial support to students who must undertake placements as part of their qualification. A requirement to undertake a mandatory unpaid placement can discourage people from enrolling in courses, as well as contributing to attrition rates. This is because students who are required to do unpaid placements may incur a range of additional expenses, such as having to relocate and find alternate housing if they are undertaking a rural, regional or remote placement. They may also be unable to participate in paid employment during this period or may need to reduce their working hours due to the time demands of their placement.

Students with an interest in placements in regional or rural areas face unique additional costs. Students are often locked into rental contracts in either student accommodation or private rental properties close to their place of study, but require accommodation close to their placement. In these instances, the students effectively incur double the accommodation costs, at a time when they may need to forgo paid employment entirely. This results in many students living in what is referred to as 'placement poverty'. Students may find this untenable, especially during a cost of living crisis. Further, some students are unable to find any suitable accommodation for regional and remote placements at all. The challenge of accommodation for health care workers in regional areas is not unique to students, but ACCPA urges the Panel to consider the role of temporary student accommodation to facilitate placements in regional settings, which may include free or heavily subsidised accommodation. Infrastructure funding would be needed to support the construction of this.

There are several ways placement poverty could be prevented, thereby encouraging more people to obtain qualifications in fields such as nursing, aged care and allied health. One option is a stipend for students required to undertake mandatory placements to help them cover their living expenses during their placement. If implemented, students should be eligible for the stipend regardless of whether they are undertaking their placement at a state or territory health department or a different setting, such as an aged care service. Another option the Review should explore is how higher education could enable and/or recognise students gaining relevant workplace experience whilst being paid. In Victoria, Registered Undergraduate Student of Nursing (RUSON) employment arrangements enable students who have completed at least a year of an undergraduate nursing degree to be employed by a health service. RUSONs may work in acute or subacute care and aged care settings and help nurses provide patient care. Incorporating a similar model as part of higher education courses instead of unpaid placements would enable students to develop practical skills and make connections to industry without compromising their financial security.

⁴ Australian Institute of Health and Welfare, *Older Australians*, 28 June 2023, <https://www.aihw.gov.au/reports/older-people/older-australians/contents/demographic-profile>

⁵ The Treasury, *2023 Intergenerational Report*, 2023, p.159, <https://treasury.gov.au/sites/default/files/2023-08/p2023-435150.pdf>

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R1 That the Review makes recommendations for measures to reduce placement poverty, such as provision of free or heavily subsidised temporary student accommodation to facilitate placements in regional settings, a stipend and/or opportunities for students to gain relevant workplace experience whilst being paid.

ACCPA welcomes the emphasis in the Interim Report on the need for greater levels of co-design of the curriculum between industry, the Vocational Education and Training (VET) sector and higher education. While higher education can be a pathway to a rewarding career, it is not the only path. Providing opportunities for Enrolled Nurses to undertake additional learning to support a Registered Nurse qualification, ideally while practising, will be critical to support the anticipated growth of the aged care and health sectors. Connecting students with industry from the start of their higher education journey could also improve access to opportunities for practical skills development and a clear pathway to a rewarding role once they have obtained the required qualification.

ACCPA supports the Interim Report's focus on microcredentials, Recognition of Prior Learning, skills passports and online training. Ongoing learning and rapid reskilling will be critical for growth sectors such as aged care, and it will be important that there are flexible options available that allow for comparable, recognised and consistent learning outcomes. A Skills Passport will support strong onboarding and recognition of training, as well as allowing for greater workforce mobility.

The introduction of further Regional University Centres could also play a key role in addressing workforce shortages in regional, rural and remote areas. Regional and remote communities have difficulty training and retaining nurses, and as a result many aged care services in these areas are heavily reliant on agency staff. Regional University Centres could encourage more students to remain in their community and obtain employment locally after completing their training which could help to build a sustainable aged care workforce in regional and remote areas.

R2 That the Review recommends the introduction of further Regional University Centres to address workforce shortages in regional, rural and remote areas.

ACCPA also supports initiatives designed to support more First Nations people to participate and succeed in higher education. As noted in the Interim Report, First Nations people are underrepresented in the undergraduate student population, as well as in sectors such as teaching and medicine where culturally specific knowledge can be particularly valuable. The importance of addressing the underrepresentation of First Nations people in the aged care workforce was noted by the Royal Commission into Aged Care Quality and Safety, which recommended developing a national Aboriginal and Torres Strait Islander Aged Care Workforce Plan, including targets for the training and employment of First Nations people across the full range of aged care roles.⁶

Additional support for First Nations people to undertake higher education may increase their participation in the health and aged care sectors, which may help to enable the provision of culturally safe care. It is also vital for staff retention that workplaces provide staff with cultural awareness training and that there are supports in place to support First Nations people. This is because there is evidence that where there are only one or two First Nations employees in a workplace, they are often expected to provide cultural knowledge, education and support to other staff which can be isolating, create additional pressure and may lead to burnout.⁷

⁶ Royal Commission into Aged Care Quality and Safety, *Final Report – List of Recommendations*, p.243, <https://agedcare.royalcommission.gov.au/sites/default/files/2021-03/final-report-recommendations.pdf>

⁷ Sivertsen, N., Ryder, C. & Johnson, T., 'First Nations people often take on the 'cultural load' in their workplaces. Employers need to ease this burden', *The Conversation*, 31 January 2023, <https://theconversation.com/first-nations-people-often-take-on-the-cultural-load-in-their-workplaces-employers-need-to-ease-this-burden-193858#:~:text=It%20can%20also%20be%20difficult,burn-out%20or%20E2%80%9Ccompassion%20fatigue%20%9D>.

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The Accord Panel should undertake consultation with First Nations communities to better understand the barriers to First Nations people undertaking higher education and working in the health and aged care sectors, as well as to identify the supports needed to boost their participation. In relation to how to encourage more First Nations people to study courses which may lead to careers in aged care, ACCPA recommends consulting with the National Aboriginal and Torres Strait Islander Ageing and Aged Care Council.

- R3 That the Review consults with First Nations people on the barriers to participation in higher education and working in sectors such as health and aged care, and the type of supports which are likely to help increase participation.**

Matters for further consideration for the Final Report

ACCPA recommends that the Accord Panel considers the following before the release of the Final Report.

While mapping for future skills needs is important, this needs to be linked to stronger promotion or prioritisation of courses that will support projected growth sectors, such as health and community care. Ideally, courses would encourage students to develop specific competencies to support growth sectors, such as gerontological nursing or allied health practitioner specialities in aged care. Revising student contribution payments and Higher Education Loan Program (HELP) repayment arrangements are key levers which could be used to encourage more students to consider working in occupations in critical professions which are experiencing workforce shortages, such as nursing.

- R4 That the Review makes recommendations to prioritise and promote courses that support projected growth sectors, including health and aged care, such as use of the taxation system (including consideration of partial or full HELP waivers).**

It is also critical that higher education providers give students opportunities to undertake placements in aged care not only in the first year of their degree (which is what commonly occurs at present), but also in the second and third years of their degrees. Second and third year students have more knowledge and experience, and are therefore able to undertake more complex tasks as part of their placements and attain an improved understanding of the work done by healthcare workers in aged care, including nurses. It also provides a valuable opportunity for students to develop relationships with potential future employers in the aged care sector and therefore may lead to more nursing students working in the aged care industry upon completion of their degree.

- R5 That the Review explores how the Universities Accord could provide an opportunity to ensure that higher education providers assign students to placements in the aged care sector throughout all stages of their degrees, thereby fostering a career pathway in the aged care sector upon graduation.**

While ACCPA is pleased to see that the Interim Report discusses the importance of a globally connected international education sector, this work could be enhanced via connection to Recognition of Prior Learning, labour mobility schemes and visa pathways. This may help to overcome several barriers which nurses seeking to work in Australia often face, including slow recognition processes, assessments and pathways to professional registration.

- R6 That the Review explores Recognition of Prior Learning, labour mobility schemes and visa pathways, as part of its consideration of the importance of a globally connected international education sector.**

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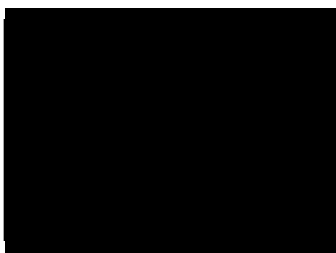
ACCPA also recommends that the Review consider additional supports aimed at encouraging people working in high need sectors to upskill. For example, this could include supporting Enrolled Nurses to undertake further training to become a Registered Nurse, or for a Personal Care Worker to undertake training to work in nursing or allied health. Many Personal Care Workers, and Enrolled Nurses in aged care, would be willing to remain in the aged care sector and undertake training as Registered Nurses, but are unable to do so due to affordability barriers, including the requirement to undertake a 16-week placement and the burden of a HELP debt.⁸

R7 That the Review recommends additional supports to encourage people working in high need sectors, such as aged care, to upskill.

The initiatives outlined above will help build a sustainable, highly skilled workforce which is able to deliver high quality care and meet the increasing demand for aged care services.

Thank you again for the opportunity to submit a response to the *Australian Universities Accord Interim Report*. ACCPA looks forward to reading the Accord Panel's final report later this year.

Yours sincerely



Roald Versteeg
General Manager, Policy and Advocacy
Aged & Community Care Providers Association

⁸ ACCPA, *Submission on the Exposure draft – Aged Care Legislation Amendment (Registered Nurses) Principles 2023*, March 2023, p.8, <https://www.accpa.asn.au/wp-content/uploads/2023/03/ACCPA-Submission-Exposure-Draft-RN-Principles.pdf>