



**Submission to the Australian Commission on
Safety and Quality in Health Care**

**Draft National Safety and Quality Mental Health Standards
for Community Managed Organisations**

About Carers WA

Carers WA is the peak body representing the needs and interests of carers in Western Australia and is part of a national network of Carers Associations. Carers provide unpaid care and support to family members and friends who are living with a disability, facing mental health challenges, long term health conditions (including a chronic condition or terminal illness), have an alcohol or drug dependency, or who are frail aged. The person they care for may be a parent, partner, sibling, child, relative, friend or neighbour.

Caring is a significant form of unpaid work in the community and is integral to the maintenance of our aged, disability, health, mental health, and palliative care systems.

Some important facts about carers include:

- There are currently 2.65 million unpaid carers in Australia.
- There are more than 230,000 families and friends in a caring role in Western Australia, or approximately 1 in 9 in the community.
- The replacement value of unpaid care, according to a report undertaken by Deloitte, Access Economics, “The economic value of unpaid care in Australia in 2020” is estimated at \$77.9 billion per annum.

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1.0 Introduction

Carers WA appreciates the opportunity to provide feedback on the Draft National Safety and Quality Mental Health Standards for Community Managed Organisations (the draft Standards), prepared by the Australian Commission on Safety and Quality in Health Care (the Commission). Comments are based on ongoing feedback from carers within and/or providing care for consumers of the mental health system.

2.0 General Feedback

2.1 Carer Identification and Recognition

Carers WA would like to thank the Commission for their consideration and inclusion of carers across the entirety of the draft Standards. The inclusion of definitions of key terms at the beginning of the document, as well as the inclusion of an expanded glossary, are considered to be key tools for ensuring clarity.

To further ensure clarity and awareness of the rights of carers, Carers WA recommends that the definition of 'families and carers' (page 6) be separated out, with an expanded definition of the term 'carer' as defined under the Australian *Carers Recognition Act 2010* ([here](#)) and inclusion of 'The Statement for Australia's Carers' within the draft Standards. A suggested definition for 'carer' may be:

'A carer is an individual who provides unpaid personal care, support and assistance to another individual who needs it because the other individual has a disability, medical condition, mental illness or is frail and aged. A carer may be a family member or a friend. Carers have certain rights to respect, recognition, support and inclusion which CMOs should be aware of, which are further outlined in 'The Statement for Australia's Carers' included within these Standards. States and Territories may have additional legislative requirements relevant to the role and rights of carers.'

Carers WA also recommends that the definition of 'carer' within the Glossary (page 33) be amended to identify that carers are unpaid. i.e. 'a person who provides' **unpaid** 'personal care, support and assistance.

2.2 Carer Inclusion and Communication

Carers WA is supportive of the inclusion of the 'Partnering with Consumers, Families and Carers Standard' and its intent, criteria and explanatory notes.

Ensuring consistent communication with and inclusion of carers in the care of consumers of the mental health system is a significant concern. The inclusion of 'carers as partners in planning, design, delivery, measurement, review and evaluation of mental health services' and consumers, families and carers being partners in their own care, would assist in addressing this issue.

To this end, Carers WA recommends the inclusion of specific reference in the Items and Actions of the draft Standards to the Australian *Carer Recognition Act 2010* and requirement for community managed organisations to be aware of and adhere to the 'The Statement for Australia's Carers' within the Act, as well as any relevant State or Territory legislative requirements. i.e. In Western Australia, the *Carers Recognition Act 2004*.

This recommendation is of importance to the draft Standards, due to mention of CMOs 'where relevant' taking actions involving families and carers. Without information regarding the rights and roles of carers and where this information can be accessed, the relevance may not be able to be easily determined or adhered to.

While the draft Standards are not presently enforceable by the Commission, Carers WA would encourage the Commission and other Government agencies to explore options for enforcement and compliance to the draft Standards.

2.3 Complaint and Escalation Options

Carers WA recommends the inclusion or additional development of a guide on complaint processes and escalation options relevant to the mental health industry. Carers WA recommends the inclusion of carer-specific information informing and educating carers and CMOs on the carer's right to submit a complaint and how to do so.

2.4 Support Information

Carers WA recommends the inclusion of information in the draft Standard regarding where and how consumers, families and carers can access support services at a Federal and State or Territory level. i.e. Carers in Western Australia can contact Carers WA and the WA Carers Gateway for carer support services on 1800 422 737.

Summary of Recommendations

- The 'carer' definition be separated out and expanded as defined under the Australian *Carers Recognition Act 2010* ([here](#)), with particular emphasis on that carers are unpaid (suggested definition included in Section 2.1);
- The 'carer' definition in the Glossary be amended to reflect that carers are unpaid;
- 'The Statement for Australia's Carers' be included within the draft Standards, as well as direction to comply by any other relevant State or Territory legislative requirements;
- Reference be made where appropriate in the draft Standard Items and Actions of the draft Standards to the Australian *Carer Recognition Act 2010*;
- Requirement be included for CMOs to be aware of and adhere to the 'The Statement for Australia's Carers' within the Act, as well as any relevant State or Territory legislative requirements;
- The Commission and other Government agencies be encouraged to explore options for enforcement and compliance to the draft Standards;
- Information be included or separate guide be developed on complaint and escalation options relevant to the mental health industry, inclusive of information regarding the carer's right to submit a complaint and how to do so;
- Support information to be included on where and how consumers, families and carers can access support services at a Federal and State or Territory level.

Conclusion

Should the Australian Commission on Safety and Quality in Health Care require any further information regarding the comments included within this submission, or assistance from the perspective of Western Australian carers, Carers WA would be delighted to assist. Please contact Carissa Gautam from Carers WA at policy@carerswa.asn.au.