



8 August 2025

Committee Secretary  
Senate Standing Committees on Community Affairs  
PO Box 6100  
Canberra ACT 2600

By email: [community.affairs.sen@aph.gov.au](mailto:community.affairs.sen@aph.gov.au)

Dear Committee

**Aged Care (Accommodation Payment Security) Levy Amendment Bill 2025 and Aged Care and Other Legislation Amendment Bill 2025**

Thank you for the opportunity to provide feedback on the Aged Care and Other Legislation Bill 2025 (the **Aged Care Bill**) and the Aged Care (Accommodation Payment Security) Levy Amendment Bill 2025 (the **Aged Care Levy Bill**). Aged and Disability Advocacy Australia (**ADA**) appreciates being consulted on these issues. Given the limited consultation timeframe, ADA's comments on the Aged Care Bill are limited to the issues identified herein.

ADA endorses the submission to this inquiry made by the Older Persons Advocacy Network (**OPAN**).

**About ADA Australia**

ADA is a not for profit, independent, community-based advocacy and education service with more than 30 years' experience in informing, supporting, representing and advocating in the interests of older people, and persons with disability in Queensland.

ADA also provides legal advocacy through ADA Law, a community legal centre and a division of ADA. ADA Law provides specialized legal advice to older people and people with disability, including those living with cognitive impairments or questioned capacity, on issues associated with human rights, elder abuse, and health and disability legal issues related to decision-making.

ADA advocates and legal practitioners work with identified First Peoples advocates through the Yarn2Action advocacy service for Aboriginal and Torres Strait Islander people with disability, to provide individual advocacy services for Aboriginal and Torres Strait Islander people with disability.

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ADA Australia acknowledges the Traditional Custodians of this land and pays respect to Elders, past and present.

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## **The Aged Care Bill**

The objectives of the Aged Care Bill are stated to propose changes to the *Aged Care Act 2025* relating to the payment of subsidies for the provision of funded aged care, as well as to ‘accommodation bond’ arrangements and other provisions intended to increase transparency and accountability.

### *Automation of processes*

The proposed changes as described include updates to automation processes that are intended to increase transparency around means-testing arrangements under the framework for financial contributions.

ADA supports measures that will increase transparency and the implementation of efficiencies that support older Australians in securing accommodation *of their choice*. However, we strongly caution that the use of all automation procedures must be reviewed using comprehensive, regular, and accountable human oversight. The human rights implications for insufficient oversight is clear; the Robodebt inquiry and findings recently demonstrates the need for proper oversight and accountability.

### *Protection of personal information*

ADA supports measures to ensure personal information is appropriately secured.

### *Star Rating System*

The Star Ratings program was introduced with dual objectives: to increase information available to Australians about the quality of aged care facilities, and to increase transparency and accountability of providers in relation to the quality of care provided.

ADA strongly supports amendments that are intended to support these goals. This rightly includes a requirement that information about provider compliance with their obligations under the law is published and accessible.

### *Review of Standards*

ADA supports a statutory requirement to review the aged-care quality standards periodically. We suggest that period should be 3 years, rather than 5 years. The proposed 5-year review timeframe fails to require actionable response and review of any inadequate standards, and may have significant and adverse impacts on recipients in that time.

## **The Aged Care Levy Bill**

### *Definition of 'Registered Provider'*

Within the consultation timeframe, ADA did not identify any concerns with the replacement of 'approved provider' in the *Aged Care (Accommodation Payment Security) Levy Act 2006* to align the terminology with 'registered provider' in the new *Aged Care Act 2025*.

Thank you again for the opportunity to comment. ADA would be pleased to further assist the Committee with its inquiry. Should you wish to discuss this submission, please do not hesitate to contact Vanessa Krulin, Principal Policy Advisor and Solicitor

Yours faithfully

**Geoff Rowe**

Chief Executive Officer