

23 October 2024

Senator Marielle Smith
Senator for SA
Chair of Community Affairs Legislation Committee
Deputy Chair of Community Affairs References Committee
By email: community.affairs.sen@aph.gov.au
CC: Members and Participating Members of the Community Affairs Committee

Dear Chair

Attain was grateful for the opportunity to testify before the Community Affairs Legislative Committee on Wednesday, 16 October 2024. This correspondence is intended to answer the two questions our representatives took on notice, make a small correction to the testimony, and to provide background in response to evidence heard by the committee on Thursday, 17 October 2024.

As advised during testimony, Attain is the parent for two leading companies operating in aged care: digital platform Mable (operated by Mable Technologies Pty Ltd) and approved provider HomeMade. These companies have separate management structures and their own boards.

I also wish to make one correction to my testimony. I stated that HomeMade “charge(s) a 15 per cent package fee and no care management fee”.¹ While the figure of 15 per cent is correct, this comprises both care management (of 7.5 per cent) and package management (of 7.5 per cent). HomeMade has also recently launched a Self Managed Plus offering which charges fees up to 22 per cent. Further information is available on the HomeMade website.²

Issues raised during testimony on 17 October

During testimony on Thursday, 17 October 2024, representatives from both the Health Services Union (HSU) and NDIS provider Hireup compared the National Disability Insurance Scheme (NDIS) with the current debate in that scheme about universal provider registration. While this might seem a reasonable comparison at surface level, it is ultimately flawed as the aged care home care sector is very different in terms of service delivery and regulation to the NDIS.

¹ See Draft Senate Hansard, p. 32.

² See [here](#).



For the Committee's reference, the most prominent difference is that under the current model, **every home care package client must have an approved provider to administer their package funds and oversee clinical outcomes.** This will not change under the new Support at Home Program, where these providers, renamed "registered providers", will remain responsible for ensuring good quality care for all home care package recipients.

The Albanese Government's proposal does not seek to treat digital platforms differently because those platforms happen to use technology, as one witness suggested, nor because some utilise independent contractors, as another witness suggested. Instead, the platforms are being treated differently because **they do not receive funds from the Government and manage those funds on behalf of the Commonwealth.** Senators should also be reassured that, regardless of whether an older person happens to use a digital platform to procure their care and support, they will still all have a registered provider to oversee their clinical outcomes. The Government has proposed carefully thought-out obligations that seek to **avoid duplication of responsibilities** between the registered provider and the platform.

In terms of aged care standards, those will remain the responsibility of the registered provider, which each older person will have access to, whether or not they use a digital platform. The proposal to require platforms to oversee compliance with the standards does not really make sense, given that the registered providers that partner with platforms will already hold that responsibility. Home care package clients that do not have a registered provider will not be able to use the platform. Such calls would only lead to further confusion within the sector without any obvious improvement for older persons.

For the avoidance of doubt, associated providers, platform providers, and digital labour platform providers are **all regulated entities under the Bill.** What is different is the nature of the obligations imposed upon those entities in recognition of the role that each plays within the aged care sector. The suggestion that associated providers should have the same obligations as registered providers is particularly egregious, given that many such providers will likely be small businesses providing non-clinical services such as gardening and house cleaning.

Mable strongly supports the regulation of digital platforms through the digital labour platform proposal. We believe it is in the best interest of all parties for the Senate to endorse this important reform: older persons, aged care workers, approved providers and the Government.

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