

31 July 2025

Mental Health and Suicide Prevention Agreement Review  
Productivity Commission  
GPO Box 1428  
Canberra City ACT 2601

Email: [mentalhealthreview@pc.gov.au](mailto:mentalhealthreview@pc.gov.au)

Dear Sir/Madam,

## Interim Report: Mental Health and Suicide Prevention Agreement Review

The Actuaries Institute (the 'Institute') welcomes the opportunity to make a submission to the Productivity Commission's (PC) Review of the Mental Health and Suicide Prevention Agreement (National Agreement).

The Institute is the peak professional body for actuaries in Australia. Our members work in a wide range of fields including insurance, superannuation, investments and retirement incomes, banking, enterprise risk management, data science and AI, climate change impacts and government services.

The Institute has a longstanding commitment to contribute to public policy discussions where our members have relevant expertise. The comments made in this submission are guided by the Institute's 'Public Policy Principles' that any policy measures or changes should promote public wellbeing, consider potential impacts on equity, be evidence-based and support effectively regulated systems.

We welcome the release of the PC's Interim Report, including at a high-level its initial findings and draft recommendations. Mental health and its funding remain a pressing public policy issue for the Australian community. We share the PC's fundamental concern that the system is fragmented and out of reach for many people.

In this submission, we offer our observations relating to particular aspects of the Inquiry's [Terms of Reference](#) and highlighted below:

*"In undertaking the review, the PC should holistically consider, assess and make recommendations on the effectiveness and operation of these programs and services in line with the National Agreement, including, but not limited to:*

...

- e) whether any unintended consequences have occurred such as cost shifting, inefficiencies or adverse consumer outcomes*

...

- i) without limiting the matters on which the PC may report, in making recommendations the PC should consider the complexity of integrating services across jurisdictions and ensuring that the voices of First Nations people and those with lived and/or living experience of mental ill-health and suicide, including families, carers and kin are heard and acted upon.*

*The PC should make recommendations for the National Agreement that aim to enhance the effectiveness, accessibility, affordability and safety of the mental health and suicide prevention system."*

## **Mental health financial supports cover both public and private schemes**

We note the PC's focus on the National Agreement. The National Agreement broadly covers the goals, role and responsibilities, priority areas, and broad domains for whole-of-government actions between the Australian Government and each of the State/Territory governments. The National Agreement reflects the critical role of governments in delivering and funding mental health care and suicide prevention initiatives.

But beyond Government programs, financial support for mental health treatments also include private health and life insurance systems that provide additional coverage for those who can afford premiums, and state-based workers' compensation schemes that protect employees from work-related injuries and illnesses. Non-Government Organisations (NGOs) also play an important role in delivering mental health care and/or financial support. Together, these mechanisms, given their different scope, funding and eligibility criteria, form a complicated, many-layered approach to financial protection for the funding of health and disability.

**We submit that the final findings and recommendations from the PC's review should be placed within the broader landscape that the Agreement is centred within.**

Critically, a wider lens would reveal the funding pressures across governments reflect system-wide financial sustainability pressures and a broader pattern of cost-shifting across the ecosystem. For example, recent and proposed changes to some workers compensation schemes and their benefit designs to lift the whole person impairment threshold for psychological issues (thereby reducing mental health cover) may help restore sustainability to one part of the safety net but shifts reliance to other parts because the community need for mental health care remains very real.

In line with the PC's recommendations, we believe the way forward is to move to a more unified system. There is a need to piece together – through linked data – a mental health financial safety net that is affordable, accessible, and unified to support people as they move within and across different public and private systems.

## **The role of data to inform reporting**

The Inquiry's Terms of Reference also includes

### *g) effectiveness of reporting and governance arrangements for the National Agreement*

To support the effectiveness of these important arrangements, having wide data availability and capability on the extent, coverage and intersections of mental health services is vital to understanding fragmentation and gaps. We welcome further comment from the PC on the collection, flow, linkage and use of data as part of finalising their review. For example, this could include the benefits of more mental health service usage and outcomes in linked repositories such as the AIHW's National Health Data Hub.<sup>1</sup>

## **Upcoming Institute Research on the Mental Health Financial Safety Net**

The Institute is currently undertaking research to explore ways to strengthen the financial safety net for mental health, examining:

- the evolving understanding and societal expectations around mental health;
- consumer access to mental health services and financial supports;
- how financial supports fit within the broader ecosystem of mental health services; and

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<sup>1</sup> <https://www.aihw.gov.au/reports-data/nhdh>

- identifying gaps, overlaps and other issues with the various financial supports for mental health across different types of insurance and government disability support mechanisms.

We anticipate releasing these findings around September and would welcome the opportunity to discuss them in the context of the Productivity's Commission's Inquiry.

The Institute may be contacted to discuss this submission. If you would like to do so, please contact the Institute via (02) 9239 6100 or [public\\_policy@actuaries.asn.au](mailto:public_policy@actuaries.asn.au).

Yours sincerely

(Signed) Elayne Grace  
Chief Executive Officer