

2 February 2024

Committee Secretary
Community Support and Services Committee
Parliament House
George Street
Brisbane Qld 4000

Via email: cssc@parliament.qld.gov.au

Dear Committee Secretary

Inquiry into the provision and regulation of supported accommodation in Queensland ('the Inquiry')

Thank you for the opportunity to provide feedback in relation to the above.

About QCOSS

Queensland Council of Social Service (QCOSS) is the peak body for the social service sector in Queensland. Our vision is to achieve equality, opportunity, and wellbeing for all Queenslanders.

QCOSS leads the [Town of Nowhere](#) campaign advocating for change to end the housing crisis in Queensland, and is a partner of the national [Everybody's Home](#) campaign.

In March 2023, QCOSS, Tenants Queensland and The Services Union, along with the [Town of Nowhere](#) campaign partners commissioned the report '[A blueprint to tackle Queensland's housing crisis](#)' ('the Pawson Report'), which clearly outlines the unprecedented housing crisis in Queensland.¹

QCOSS' position

QCOSS welcomes the Inquiry and supports the goals of considering the appropriateness of residential services as defined under the *Residential Services (Accreditation) Act 2002* and other shared living arrangements.

Our position has been informed from consultations with QCOSS member organisations who provide support to people living in supported accommodation. This consultation included convening a QCOSS Human Rights Network ('the Network') in January 2023, which collated feedback specifically in relation to the Inquiry.

Queensland's current housing crisis has laid bare the vulnerabilities that exist in the housing system. Our frontline services are currently witnessing distressing levels of housing need and the human impacts of the same.² The Pawson Report found over 150,000 households in Queensland have an unmet need for social and affordable housing.³

Over 7,000 people live in supported accommodation across Queensland, with more than 3,500 people living in boarding houses (level 1) and 1,400 people living in residences

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- ¹ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng. 2023. *A Blueprint to tackle Queensland's housing crisis*. Queensland Council of Social Service. 22 January 2024. <https://www.qcooss.org.au/wp-content/uploads/2023/03/Hal-Pawson-Report-2023-Final.pdf>
 - ² Queensland Council of Social Service. 2022. 22 January 2024. https://www.qcooss.org.au/wp-content/uploads/2021/08/20210812_StateoftheSectorReport.pdf
 - ³ H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng. 2023. p. 66-73.



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providing the highest level of support (level 3).⁴ For many people living in supported accommodation, it is an option of last resort and only becomes a person's residence due to a lack of alternative housing and supports.⁵ This lack of housing includes a significant under supply of social housing, with over 25,000 households currently waiting for social housing in Queensland.⁶ A person living in supported accommodation (e.g. a boarding house) is unlikely to be the highest priority for social housing as people with more urgent and complex needs (e.g. someone who is sleeping rough) are more likely to be offered housing ahead of the person who has some form of accommodation, even if it is a poor quality boarding room.⁷

People living in supported accommodation often have low incomes and experience complex mental health, intellectual disability, and/or substance use. This increases the complexity of wellbeing needs and heightens the risk of abuse, neglect, and exploitation being experienced.⁸

The supported accommodation legislative framework and the service delivery approach in Queensland must be reformed, and reform measures must incorporate all three levels of supported accommodation (level 1, 2, and 3), as the current regulatory framework and delivery approach do not adequately protect people's rights or support individual wellbeing. The intent of the reform must be to deliver a regulatory framework that fosters the creation of inclusive housing for Queenslanders who require affordable housing that is secure and safe and enables people to maintain their wellbeing and achieve their goals.⁹

Network feedback

At the Network, participants responded to a range of polling questions. Responses to these questions included:

1. When asked if legislative reform is needed to protect people's rights, a significant majority (87.18 per cent) said they think the *Residential Services (Accreditation) Act 2002 (Qld)* that regulates supported accommodation in Queensland needs to be reviewed and amended to increase protection of people's rights.¹⁰ Just over 10 per

⁴ Queensland Government. Department of Housing. *Residential services register with Department of Housing – Register of Residential Services*. Quarter ended 31 October 2024. Accessed 22 January 2023. <https://www.data.qld.gov.au/dataset/residential-services-registered-with-the-department-of-communities-housing-and-digital-economy>

⁵ The Public Advocate. August 2023. *'Safe, Secure and affordable'? The need for an inquiry supported accommodation in Queensland*. 22 January 2024. p.19-20. https://www.justice.qld.gov.au/data/assets/pdf_file/0010/778888/2023-08-supported-accommodation-report-final.pdf

⁶ Queensland Government. 30 September 2023. Department *Social housing register at 30 September 2023 – Data file*. Department of Housing. 22 January 2024. <https://www.data.qld.gov.au/dataset/social-housing-register/resource/2b0ed842-9883-4187-8f97-fbb9b12fe68e>

⁷ Queensland Government. *Guide to applying for housing assistance – If you are eligible for public and community housing*. Department of Housing. 22 January 2023. <https://www.qld.gov.au/housing/public-community-housing/eligibility-applying-for-housing/guide-to-applying-for-housing-assistance/after-you-apply>

⁸ Commonwealth of Australia. 2023. *Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, Inclusive education, employment, and housing – Part C Final Report Volume 7*. September 2023. Accessed 22 January 2024. p.535 <https://disability.royalcommission.gov.au/system/files/2023-09/Final%20Report%20-%20Volume%207%2C%20Inclusive%20education%2C%20employment%20and%20housing%20-%20Part%20C.pdf>

⁹ Queenslanders with Disability Network. 2022. *Co-Design for inclusive housing final report*. Accessed 22 January 2024. https://qdn.org.au/wp-content/uploads/2022/10/QDN_co-design-for-inclusive-housing-final-report-August-2022-1.pdf

¹⁰ Queensland Council of Social Services. 24 January 2024. *Human Rights Network Meeting Supported Accommodation – Poll 1 Results*.

cent were unsure and 2.56 per cent of attendees said 'no' the legislation did not need to be amended.¹¹

2. From a list of themes identified from prior member discussions and research, attendees (28 responders) were also asked to select the three issues they think have the most adverse impact on people living in supported accommodation. The top five issues that received the most responses were:
 - Lack of choice and control (e.g. in the daily living environment or accessing support services)
 - High cost of fees for services
 - Quality and appropriateness of accommodation
 - Lack of government funding for supported accommodation providers to deliver services
 - Lack of wholistic support (e.g. physical health, mental health, NDIS, housing, advocacy).¹²
3. When asked to select what they thought were the most important changes for improving supported accommodation. The top five changes were:
 - Review and update legislation using a human rights, person-centred approach to strengthen the rights of people who live in supported accommodation
 - Implementing minimum quality standards for accommodation and support services
 - Fund independent case managers for people living in supported accommodation
 - Invest in mental health services to improve psychosocial support available for people living in supported accommodation
 - Establish a comprehensive assessment and planning process to understand people's goals and support needs.¹³

Further detail collated from our consultations highlighting current issues in the supported accommodation system in Queensland and specific recommendations for change are provided below.

Regulatory reform

Although the current regulatory framework for some supported accommodation is complex (level 3), limited regulatory protections exist to protect people's rights and to ensure minimum standards for quality of accommodation and support.¹⁴

QCROSS members and stakeholders identified many concerns about people's rights not being adequately protected in relation to privacy, lack of choice and control, restrictive house

¹¹ *ibid.*

¹² Queensland Council of Social Services. 24 January 2024. *Human Rights Network Meeting Supported Accommodation – Poll 2 Results.*

¹³ Queensland Council of Social Services. 24 January 2024. *Human Rights Network Meeting Supported Accommodation – Poll 3 Results.*

¹⁴ Commonwealth of Australia. 2023. p.581-589

rules, and features of dwellings and support practices that are consistent with institutionalisation.¹⁵

To ensure people's rights are being upheld, the regulatory framework for supported accommodation (inclusive of levels 1 to 3) must be reformed using a human rights-based, person-centred approach to design reform measures that respect and protect the rights and wellbeing of people who need supported housing.^{16,17}

Recommendation 1: The regulatory framework for supported accommodation (including levels 1, 2 and 3) must be reformed using a human rights-based person-centred approach to design reform measures that respect and protect rights, and support people to maintain wellbeing and achieve goals. The scope of the reforms must include strengthening people's rights across the regulatory system, such as strengthening boarding and tenancy rights.^{18,19}

Co-design reforms

Including people who use systems and services in the process of designing them is a proven approach for developing person-centred systems and processes that more effectively meet people's needs.²⁰

Co-design is a design method that includes people who use systems and services directly in the design process to ensure that changes to systems and services meet people's needs.^{21, 22}

Regulatory forms must be co-designed with people who live or have lived in supported accommodation to ensure that reforms are designed with people who use them.

Recommendation 2: Using a person-centred approach, regulatory reforms must be co-designed with people who live or have lived in supported accommodation.

Improve exit planning

Feedback from QCOSS members and stakeholders indicates that it is common for people to move into supported accommodation to avoid homelessness when exiting institutions, even if the accommodation is insecure and does not meet their needs.

Consistent with this feedback, housing and homelessness sector advocates have called for improved exit planning from government services when people are leaving institutions

¹⁵ *Human Rights Act 2019* (QLD). Accessed 22 January 2024.

<https://www.legislation.qld.gov.au/view/pdf/inforce/current/act-2019-005>

¹⁶ Australian Human Rights Commission. *Human Rights Based Approaches*. Accessed 22 January 2024.

<https://humanrights.gov.au/our-work/rights-and-freedoms/human-rights-based-approaches>

¹⁷ National Disability Practitioners. *What is a person-centred approach*. Accessed 22 January 2024. [2016-10-person-centred-approach.pdf \(ndp.org.au\)](https://www.ndp.org.au/2016-10-person-centred-approach.pdf)

¹⁸ Australian Human Rights Commission.

¹⁹ National Disability Practitioners.

²⁰ Clarke, M., & Healy, J. (2018). *Complex Systems Change Starts with Those Who Use the Systems*. Stanford Social Innovation Review. <https://doi.org/10.48558/T6YN-1X24>

²¹ New South Wales Council of Social Service. 2017. *Principles of Co-Design*.

<https://www.ncoss.org.au/wp-content/uploads/2017/06/Codesign-principles.pdf>

²² Queenslanders with Disability Network. *QDN's Co-Design Principals*. Accessed 22 January 2024. https://qdn.org.au/wp-content/uploads/2022/02/QDN_Co-Design-Principles_FINAL_2022.pdf

(including health services, mental health services, correctional facilities, and out-of-home care), stating it is critical for reducing homelessness among people with disability.²³

The Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, Recommendation 7.39 describes that to prevent homelessness when people with disability transition from service or institutional settings, governments should “commit to a policy of ‘no leaving into homelessness’ for people with disability.”²⁴

To achieve this commitment The Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability recommends a lead agency undertake exit planning, that should include:

- “developing and implementing individual plans for people with disability leaving service or institutional settings to identify housing, services and supports for a successful transition into secure housing
- ensuring supports can be put in place before a person with disability leaves the service or institutional setting
- coordinating the implementation of the plan until the person with disability has successfully transitioned to safe and appropriate housing.”²⁵

Recommendation 3: The Queensland and Commonwealth Government must work collaboratively across systems to improve exit planning for people with disability leaving institutional settings (including health services, mental health services, correctional facilities, and out-of-home care) to ensure people access housing that is safe, secure, affordable and appropriate for their needs, and that the person has access to services that support wellbeing and reduce the risk of homelessness.

Fees and charges

QCOS members and stakeholders raised significant concern about the cost and quality of services received by many people living in supported accommodation, and the ability for providers to charge for both support provided under the supported accommodation framework and the NDIS. In a poll of social service sector workers, the high cost of services was identified as an issue that has a significant adverse impact on people living in supported accommodation.²⁶

As identified by The Public Advocate, the cost of accommodation is considered a barrier to accessing other support, and in some instances, residents are paying high costs for shared rooms and bathroom facilities, and poor-quality food.²⁷

Recommendation 4: Reform of the supported accommodation regulatory framework must include regulating fees charged by providers for accommodation and support.

²³ Commonwealth of Australia. *Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, Inclusive education, employment and housing – Part C Final Report Volume 7*. September 2023. Accessed 22 January 2024. p. 590 <https://disability.royalcommission.gov.au/publications/final-report-volume-7-inclusive-education-employment-and-housing>

²⁴ Commonwealth of Australia. 2023. p. 592

²⁵ Commonwealth of Australia. 2023. p. 592 <https://disability.royalcommission.gov.au/publications/final-report-volume-7-inclusive-education-employment-and-housing>

²⁶ Queensland Council of Social Services. 24 January 2024. Human Rights Network Meeting Supported Accommodation – Poll 2 Results.

²⁷ The Public Advocate. August 2023. [2023-08-supported-accommodation-report-final.pdf](https://www.justice.qld.gov.au/2023-08-supported-accommodation-report-final.pdf) ([justice.qld.gov.au](https://www.justice.qld.gov.au)) p. 29

Oversight

There are several areas within the supported accommodation system where there is currently inadequate independent oversight. The Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability Recommendation 7.38, recommended “to put in place minimum services standards, monitoring, and oversight for supported accommodation.” This recommendation describes that supported accommodation providers (level 3) must implement “minimum service and accommodation standards, strengthen oversight mechanisms, and increase service-level monitoring activities and compliance actions.”²⁸

As identified in the recommendation it is important that the minimum standards are comprehensive and incorporate the following elements:

- developing comprehensive support plans encompassing all life domains
- monitor effectiveness of plans
- clearly defined complaint management processes that include reporting to central registration body
- guaranteed independent advocacy including advocacy focused on identifying alternative accommodation and service
- implementing monitoring and oversight mechanisms, including ensuring an on-going audit process is in place that involves direct engagement with the client
- establishing procedures to monitor services in response to complaints and incidents, including the rights of community visitor programs to attend and report on standards
- providing regulatory entities with adequate powers to enforce all standards.²⁹

Implementation of minimum standards for dwellings should be co-designed with people living in supported accommodation to ensure dwellings are safe, appropriate for people’s needs and wellbeing, and promote human rights such as the right to privacy and security.³⁰

Feedback from QCOSS members and stakeholders also indicated that the provision of accommodation, food, personal care, and NDIS services by the same providers was a significant concern because it creates circumstances where there is limited choice and control for the resident, conflicts of interest, poor quality and cost controls. This feedback is consistent with feedback reported in the Public Advocate Report.³¹

Recommendation 7.37 made by the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability also recommended strengthening tenancy and occupancy protections for people with disability, including improving dispute resolution processes to ensure that “tribunals be required when determining whether to make an eviction order to consider the occupant’s disability, the nature of that disability, the possibility of retaliatory eviction, and the likelihood of finding suitable alternative accommodation.”³²

²⁸ Commonwealth of Australia. p. 592

²⁹ Commonwealth of Australia. 2023. p. 592

³⁰ Queenslanders with Disability Network. 2022. p. 11

³¹ The Public Advocate. August 2023.

³² Commonwealth of Australia. 2023. p. 577

Reform of the regulatory framework must strengthen oversights by implementing minimum accommodation and service standards, including establishing mechanisms to limit the potential for service provider conflicts of interest occurring and to improve transparency.^{33,34}

Recommendation 5: Reform of the regulatory framework must strengthen oversight by implementing:

- minimum accommodation and support standards
- independent monitoring of compliance with minimum standards
- mechanisms to limit the potential for service provider conflict of interest and to improve transparency
- clearly defined complaint management processes that includes reporting to central registration body
- changes to strengthen rights in intersecting legislation, such as rooming and tenancy rights.^{35,36,37}

Invest in housing that is appropriate for people's needs

Most supported accommodation providers in Queensland are for-profit providers who receive no government funding.³⁸ The accommodation is often insecure, inadequate for people's needs, and viewed as temporary by the people who live there.³⁹ Support available is often unable to effectively support people's wellbeing, and fees paid by residents can represent most of the persons income, with instances reported of people using 95 per cent of their income to access the housing and support.^{40,41}

A lack of government investment and oversight for supported accommodation has contributed to the inability of many supported accommodation providers to provide secure, safe, and contemporary supported accommodation and support that promotes people's wellbeing and achievement of goals.⁴²

QCROSS members and stakeholders identified that the quality of supported accommodation and support varied greatly, and in some instances, accommodation is poorly maintained, unsafe, and does not provide environments that respect people's rights. Examples given by stakeholders included a lack of privacy due to shared rooms (with up to four people sharing a bedroom), shared bathroom facilities where showers are scheduled, lack of access to basic food preparation facilities, minimal personal support that only includes medication

³³ Commonwealth of Australia. 2023. p.588.

³⁴ The Public Advocate. August 2023. p.33-34.

³⁵ Commonwealth of Australia. p.588.

³⁶ The Public Advocate. August 2023. p. 33-34.

³⁷ Queenslanders with Disability Network. 2022. p.11.

³⁸ Queensland Government. Department of Housing. *Residential services register with Department of Housing – Register of Residential Services*. Quarter ended 31 October 2024. Accessed 22 January 2023. <https://www.data.qld.gov.au/dataset/residential-services-registered-with-the-department-of-communities-housing-and-digital-economy>

³⁹ The Public Advocate. August 2023. p.36

⁴⁰ *ibid.* p. 29-30

⁴¹ Commonwealth of Australia. 2023.

⁴² Queensland Government Community Support and Services Committee. *Public Hearing – Inquiry into the provision and regulation of supported accommodation in Queensland Transcript of Proceedings – Supported Accommodation Providers*. Queensland Government. 13 December 2023. Accessed 22 January 2024. P. 23 -30 <https://documents.parliament.qld.gov.au/com/CSSC-0A12/IPRSAQ00AB/Public%20Hearing,%2013%20December%202023.pdf>

distribution, and some providers having building infrastructure and support practices that are consistent with features defined as institutionalisation.

Research undertaken by the Royal Commission into Violence, Abuse, Neglect and Exploitation found “congregated accommodation settings (e.g, institutions, hostels, and boarding house-like facilities) need to be closed. They are unsafe and unable to deliver on the expectations of and obligations imposed by the United Nations Convention on the Rights of Persons with Disabilities.”⁴³

The Queensland Government must invest in dwellings for ‘supported housing’ to deliver contemporary dwellings that respect people’s right to have access to community-based housing appropriate for people’s needs. Please note the reference to ‘supported housing’ is intentional to reflect that after gaining a comprehensive understanding of people’s needs and establishing minimum standards, current supported accommodation dwellings may not be appropriate. Investment in dwellings should only be directed toward improvements and new dwellings that result in housing solutions that align with the reform agenda.

Recommendation 6: The Queensland Government must invest in ‘supported housing’ dwellings (improvements and new) to ensure people currently living in supported accommodation have access to housing that is community-based and appropriate for the person’s needs, this should include public and community housing.

Transitioning to an evidence-based person-centred service delivery model that includes supportive housing

The Queensland Government must invest in the delivery of support services for people living in supported accommodation and improve the quality of support by transitioning the service delivery approach to a contemporary evidence-based person-centred approach that respects people’s rights and supports wellbeing and achievement goals.

A Housing First Approach is an evidence-based person-centred and recovery-oriented approach to housing.^{44,45} The approach prioritises providing access to permanent housing to meet a person’s needs.⁴⁶ Supportive housing is a form of ‘supported housing’ that is a key feature of the Housing First Approach. Supportive housing is an evidence-based model for providing person-centred accommodation and support for people with complex support needs.⁴⁷ Supportive Housing is also a “proven solution for ending chronic homelessness by

⁴³ The Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability and The University of Melbourne. 2022. *Outcomes associated with ‘inclusion’, ‘segregated’ and ‘integrated’ settings for people with disability*. Accessed on 22 January 2024. p. 50

<https://disability.royalcommission.gov.au/system/files/2023-09/Research%20Report%20-%20Outcomes%20associated%20with%20%27inclusive%27%2C%20%27segregated%27%20and%20%27integrated%27%20settings%20for%20people%20with%20disability.pdf>

⁴⁴ Roggenbuck, C. 2022. *Housing First: An evidence review of implementation, effectiveness and outcomes*. Australian Housing and Urban Research Institute Limited. Melbourne.

<https://www.ahuri.edu.au/research/research-papers/housing-first-an-evidence-review-of-implementation-effectiveness-and-outcomes>

⁴⁵ Homelessness Hub. 2020. *Housing First*. Accessed 22 January 2023.

<https://www.homelesshub.ca/solutions/housing-accommodation-and-supports/housing-first#:~:text=Housing%20First%20practice%20is%20not%20simply%20focused%20on,maintain%20social%2C%20recreational%2C%20educational%2C%20occupational%20and%20vocational%20activities.>

⁴⁶ Homelessness Australia. *Housing First Principles for Australia*. Accessed 22 January 2024.

<https://homelessnessaustralia.org.au/wp-content/uploads/2022/07/Housing-First-Principles.pdf>

⁴⁷ Alves, T., Brackertz, N., Roggenbuck, C., Hayes, L., McGauran, R., Sundermann, K. and Kyneton, N. 2022. *Common Ground Housing Model Practice Manual*, prepared with MGS Architects, Mind Australia, Australian Housing and Urban Research Institute Limited. <https://www.ahuri.edu.au/services/resource-development/common-ground-housing-model-practice-manual>

providing dignified and quality housing and support services for people with complex and high support needs.”⁴⁸

Recommendation 7: The Queensland Government must invest in a review of the supported accommodation service delivery model with a view to transitioning to the contemporary evidence-based person-centred Housing First Approach that includes investment in permanent supportive housing. Transition plans must also incorporate a workforce strategy to develop the workforce knowledge and skills required to deliver services using a Housing First Approach.

For further guidance refer to: [Housing First: An evidence review of implementation, effectiveness and outcomes](#), [Equitable and Inclusive Housing Systems for All](#), [Housing First \(Recovery-oriented approach\)](#), [Housing First Principles for Australia](#), and the [Common Ground Housing Model Practice Manual](#)

(Note: All government funding must be linked to maintaining adherence with minimum quality standards for accommodation and support services).

Independent case management support

Independent case management support is an important feature of effective person-centred permanent supported accommodation.⁴⁹ QCOSS members and stakeholders identified that wholistic support and independent case management is a significant gap in the current system.^{50,51} Potential impacts of not having case management support that were discussed include that it:

- significantly reduces a person’s awareness of their rights
- reduces people’s ability to access wholistic planning and support
- restricts or limits a person’s capacity and ability to advocate for change
- minimises the opportunity to access pathways out of supported accommodation.

This feedback is consistent with feedback captured in The Public Advocate report.⁵²

The Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability found that “the risks of exposure to violence, abuse, neglect and exploitation increase when people with disability are isolated and deprived of choice and control over the services they receive, and have limited capacity to raise concerns about the design, delivery, quality and safety of essential services and supports. Self-advocacy skills and access to independent advocacy are integral to safe, quality service provision and day to day choice and control.”⁵³

QCOSS members and stakeholders identified that funding for independent case management to provide complex case management support must be prioritised to protect people’s rights and support wellbeing of people living in supported accommodation. Case

⁴⁸ Queensland Council of Social Service. 2023. *Queensland Budget 2024-2025: Our pre-budget submission – End Queensland’s Housing Crisis*. Accessed January 2024. <https://www.qcross.org.au/wp-content/uploads/2023/11/2.-End-Queenslands-housing-crisis.pdf>

⁴⁹ Roggenbuck, C. 2022.

⁵⁰ Queensland Council of Social Services. 24 January 2024. *Human Rights Network Meeting Supported Accommodation – Poll 2 Results*.

⁵¹ Queensland Council of Social Services. 24 January 2024. *Human Rights Network Meeting Supported Accommodation – Poll 3 Results*.

⁵² The Public Advocate. August 2023. p.42

⁵³ Commonwealth of Australia. 2023. p. 168

management support should also include support to access pathways out of supported accommodation.⁵⁴

Recommendation 8: The Queensland Government must invest in the provision of independent person-centred case management support to assist people with wholistic planning, systems navigation, accessing support services, development of self-advocacy skills, and assisting with planning pathways out of supported accommodation.

Gain a comprehensive understanding of accommodation and wellbeing support needs

Prior to investing in improving accommodation and support services, the accommodation and wellbeing support needs of people living in supported accommodation need to be better understood.

“While there is limited current information available on the people who reside in level 3 residential services, it is likely that a significant number of residents have a disability such as an intellectual impairment or acquired brain injury, mental health concerns, or issues relating to drug and alcohol use. It is likely that many experience impaired decision-making ability. Many residents have a variety of complex support needs and engage with services across a range of government systems. Many have limited support networks and connections to the community.”⁵⁵

To gain a wholistic understanding of the accommodation and wellbeing support needs of people living in supported accommodation the government must undertake a process to understand people’s needs and goals.

Recommendation 9: Undertake a person-centred process to gain a comprehensive understanding of the wellbeing goals and support needs of people living in level 1, 2, and 3 supported accommodation.⁵⁶

Integrate support services and increase investment in psychosocial support

Although the exact number of people living in supported accommodation who have psychosocial disability is unknown, it is known that many people who live in supported accommodation live with psychosocial disabilities.⁵⁷ QCOSS members and stakeholders identified that greater integration of the support services across systems is needed. However, the lack of access to psychosocial support was consistently identified as being a significant issue.^{58,59}

The independent review into the National Disability Insurance Scheme (NDIS) found that: “Psychosocial support programs outside the NDIS are inadequate and fragmented. Many people are unable to access the supports they need, negatively affecting their quality of life and employment opportunities. In 2020, the Productivity Commission estimated that around

⁵⁴ Queensland Council of Social Services. 24 January 2024. *Human Rights Network Meeting Supported Accommodation – Poll 3 Results*.

⁵⁵ The Public Advocate. August 2023. p.8

⁵⁶ Queenslanders with Disability Network. 2022.

⁵⁷ The Public Advocate. August 2023.

⁵⁸ Queensland Council of Social Services. 24 January 2024. *Human Rights Network Meeting Supported Accommodation – Poll 2 Results*.

⁵⁹ Queensland Council of Social Services. 24 January 2024. *Human Rights Network Meeting Supported Accommodation – Poll 3 Results*.

154,000 of the 290,000 people with severe and persistent mental illness were unable to access psychosocial supports.”⁶⁰

The Independent Review of the NDIS recommended that:

- the mental health system should work together to ensure supports are provided concurrently
- the NDIS needs to approach psychosocial disability with a focus on personal recovery for people with severe mental illness
- better connection of NDIS with the wider mental health ecosystem is needed
- National Cabinet should jointly invest in psychosocial supports outside the NDIS to assist people with severe and persistent mental ill-health.⁶¹

The Review made a specific recommendation that the NDIS “introduce a new approach to NDIS supports for psychosocial disability, focused on personal recovery, and develop mental health reforms to better support people with severe mental illness.”⁶²

The 2024-2025 budget submission by Queensland Alliance for Mental Health, Arafmi Ltd and Mental Health Lived Experience Peak Queensland also calls for a significant increase in investment in the community mental health and wellbeing sector, and states “the latest available Report on Government Services (RoGS) data for 2020-2021, Queensland invests just 4.7 per cent of its mental health funding in community managed mental health NGOs, the lowest rate of any state or territory. This low investment has created a gaping hole in psychosocial supports to support the most vulnerable people in our community. Last year, Queensland Health stated in its submission to the Inquiry into Opportunities to Improve Mental Health Outcomes for Queenslanders that it has calculated that it is meeting just 29.6 per cent of need for NGO-delivered psychosocial supports within its remit of severe and complex mental distress. This is less than a third of the service capacity required to meet critical support needs.”⁶³

Access to adequate psychosocial support services is critical for many people living in supported accommodation to manage and maintain their wellbeing.

Recommendation 10: In collaboration with the National Disability Insurance Agency, the Queensland Government must improve the integration of access to wholistic wellbeing support, and significantly increase investment in the delivery of psychosocial supports for people living in supported accommodation.⁶⁴

⁶⁰ Commonwealth of Australia. 2023. *Working together to deliver the NDIS – Independent Review into the National Disability Insurance Scheme Final Report*. Department of the Prime Minister and Cabinet. Accessed 22 January 2024. p. 63
<https://www.ndisreview.gov.au/sites/default/files/resource/download/working-together-ndis-review-final-report.pdf>

⁶¹ *ibid.* p. 74 - 135

⁶² *ibid.* p.135

⁶³ Queensland Alliance for Mental Health, Arafmi Ltd and Mental Health Lived Experience Peak Queensland. November 2023. *2024-2025 Queensland Budget Submission*. Accessed 22 January 2024. p. 4. <https://www.qamh.org.au/works/2024-state-budget-submission-2/>

⁶⁴ Commonwealth of Australia. 2023. *Working together to deliver the NDIS – Independent Review into the National Disability Insurance Scheme Final Report*.

Conclusion

The current model of supported accommodation falls short of providing accommodation and support that protect people's rights and to provide safe, secure, affordable accommodation and support that fosters wellbeing.

Systemic change through both legislative and service delivery reform is required to ensure people living in supported accommodation have access to safe, secure, and affordable housing that respects people's rights and is appropriate for people's needs. Significant government investment is required to ensure people have access to person-centred wellbeing supports that meet people's needs and supports achievement of goals.

Thank you again for the opportunity to provide the submission. If you have any questions, please contact Aimee McVeigh, Chief Executive Officer at aimee@gcross.org.au.

Yours sincerely

A handwritten signature in black ink that reads "Aimee McVeigh". The signature is written in a cursive, flowing style.

Aimee McVeigh
Chief Executive Officer