

Inquiry into the provision and regulation of supported accommodation in Queensland

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2 February 2024

Ms Lynda Pretty
Committee Secretariat
Community Support and Services Committee

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

Dear Ms Pretty

Inquiry into the Provision and Regulation of Supported Accommodation in Queensland

The Queensland Public Trustee (QPT) provides independent state trustee services dedicated to advancing and safeguarding the rights, interests and wishes of Queenslanders, particularly those in need of financial management services. The organisation plays a significant role in Queensland's guardianship and administration system. It is committed to working with the government, other agencies and partners, our customers and their support networks to improve outcomes for adults living in Level 3 Supported Accommodation facilities.

During the 2022-23 financial year, QPT provided financial management services to 10,596 customers¹. Our customers with impaired decision-making abilities are a broad and diverse group, and those who reside in Level 3 Supported Accommodation facilities are some of the most vulnerable people in Queensland. As highlighted in the Public Advocate report '*Safe, secure and affordable? The need for an inquiry into supported accommodation in Queensland*', this group often have limited income and many experience a range of disadvantages (including intellectual and/or psychiatric disability, drug and alcohol problems, brain injury, problems associated with ageing, social, economic disadvantage, and social isolation)².

QPT confirms that we have customers living in all 42 accredited Level 3 Supported Accommodation facilities registered under the *Residential Services (Accreditation) Act 2002 (Qld)*.

The Community Support and Services Committee (CSSC) invited representatives of the Queensland Public Trustee (QPT) to appear at the public hearing for this inquiry on 13 December 2023. To further highlight the complexities identified in the Public Advocate's

¹ Comprised of 9,731 adults with impaired decision-making capacity, acting as financial attorney for 222 customers and managing the estate of 643 prisoners.

² https://www.justice.qld.gov.au/_data/assets/pdf_file/0010/778888/2023-08-supported-accommodation-report-final.pdf

report, this submission will provide further details in response to questions three and four raised in the report:

- “3. *Are current charges for level 3 residential services reasonable?*
 - a. *Do they enable residents to have sufficient disposable income to ensure a reasonable quality of life?*
 - b. *Do they enable providers to deliver quality services on a financially viable basis?*
 - c. *Should a cap be placed on the amount that residents are able to be charged?*

4. *Should greater transparency be required of level 3 residential service providers concerning the fees charged for accommodation, food, and personal care services?”*

As identified in the Public Advocate’s Report and the Final Report of the Disability Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability³, the legislative and regulatory frameworks of supported accommodation and their interstate equivalents are complex, and no jurisdictions have a regulated fee and charges schedule. In preparation for the appearance at the Public Hearing and this submission, QPT reviewed a random sample of Rooming accommodation agreements (Form R18)⁴ and individual customer budgets from some of the 43 accredited Level 3 supported accommodation facilities.

Table 1 shows a comparison of Rooming Accommodation Agreement Costs for the most expensive, mid-range and least expensive fees for Level 3 Supported Accommodation facilities and the percentage of income these costs represent based on the maximum rate of the Services Australia Disability Support Pension (DSP) of \$1,096.70 per fortnight (inclusive of pension and energy supplements) plus the maximum rate of the Services Australia Rent Assistance payment of \$184.80 per fortnight.

	Most Expensive	Mid-Range	Least Expensive
Total cost per fortnight (percentage of income)	\$1,060.00 (82.7%)	\$920.00 (71.8%)	\$700.00 (54.6%)
Accommodation costs (percentage of income)	\$960.00 (74.9%)	\$460.00 (35.9%)	\$560.00 (43.7%)
Food costs (percentage of income)	\$100.00 (7.8%)	\$184.00 (14.3%)	\$140.00 (10.9%)
Personal Care Services (percentage of income)	\$0.00 (0%)	\$138.00 (10.7%)	\$0.00 (0%)

Table 1: Comparison of Rooming Accommodation Costs

³ <https://disability.royalcommission.gov.au/publications/final-report>

⁴ <https://www.rta.qld.gov.au/forms-resources/forms/forms-for-rooming-accommodation/rooming-accommodation-agreement-form-r18>

Additionally, the random sample demonstrated the following:

- Costs varied significantly between all providers.
- All residents in the sample received a Services Australia Disability Support Pension, eligible supplements and Commonwealth Rent Assistance payments.
- While all rooming agreements indicated they were providing Level 3 supported accommodation, a significant proportion of the rooming agreements showed that no proportion of the fees were for personal care services.
- On deduction of essential costs such as medication, medical expenses, child support payments, clothing and allowances for special occasions (i.e., Christmas and birthday payments), a common theme was that each individual had limited discretionary spending in their personal budgets, ranging from \$2.00 (0.2% of income) to \$200.00 (15% of income) per fortnight.

In summary, QPT is a key stakeholder in supporting the rights and financial interests of vulnerable Queenslanders, particularly those who live in Level 3 Supported Accommodation facilities. In addition to appearing at the Public Hearing held by the CSSC on 13 December 2023 and providing additional information to questions taken on notice at the hearing to the committee on 19 January 2024, QPT undertook a random review of Rooming Accommodation Agreements and customer budgets of customers residing in Level 3 Supported Accommodation to assist the parliamentary inquiry further. The results reveal significant cost variations among providers and that residents, most of whom are reliant on disability support pensions, faced limited discretionary spending after deducting essential costs, emphasising the need for careful consideration in regulating fees and ensuring transparency in Level 3 Supported Accommodation.

Should you require further information about the contents of this submission, you are invited to contact [REDACTED] Director Regional Services Central on [REDACTED] or at [REDACTED].

Yours sincerely

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[REDACTED]
Public Trustee of Queensland and CEO