



## Council of Social Service of New South Wales

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Placement Policy Feedback  
APD Directorate, DADHC  
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Dear APD Directorate

Thank you for the opportunity to provide feedback on the DADHC Draft Allocation of Places in Supported Accommodation Policy.

### About NCOSS

Established in 1935, the Council of Social Service of NSW (NCOSS) is an independent non-government organisation and is the peak body for the non-government human services sector in NSW. NCOSS works with its members on behalf of disadvantaged people and communities towards achieving social justice in New South Wales.

NCOSS is part of a national network of Councils of Social Service, which operate in each State and Territory and at Commonwealth level.

NCOSS membership comprises community organisations and interested individuals. Affiliate members include local government councils, business organisations and Government agencies. Through current membership forums, NCOSS represents more than 7,000 community organisations and over 100,000 consumers and individuals.

### General Comments

NCOSS understands that the *Allocation of Places in Supported Accommodation Policy* governs how people with disability requiring supported accommodation are matched to vacancies in government and non-government service systems. It also covers “drop-in” or “in-home” accommodation support.

NCOSS completely recognises the vast unmet need for a more flexible range of and greater supply of supported accommodation places in NSW. In its June 2007 report on current and future need for disability services, the Australian Institute for Health and Welfare indicated that in the year 2005, NSW needed at least an extra 7,200 places. However, under both NSW and Commonwealth governments’ planned funding strategies, there will be 1570 new places to meet unmet need by the year 2012.

NCOSS is concerned that the DADHC policy permanently entrenches family responsibility for ongoing care of the adult regardless of the needs and wants of either the adult with disability or their family. The policy says that “supported accommodation will only be considered after all other support options have been exhausted”. This means that adults remain the

responsibility of their family until the family cannot continue. The NSW Disability Services Act is based on the premise that people with disabilities should be supported to access the same life choices as people without disabilities of the same age. At age 18, a person without disability is no longer considered the responsibility of their family, thus it should be for a person with disability.

The DADHC policy directs that only people needing immediate placements can go onto the statewide accommodation register, thus disallowing any forward planning for people and families. Like the DADHC respite policy, the supported accommodation policy sets out procedures based on “reasonable” offers. It is clear that what DADHC considers to be a reasonable offer and what the person and their family consider to be reasonable could be poles apart.

Essential factors in determining a reasonable offer, such as maintaining contact with personal and social networks; reachable family proximity; compatibility with others at the placement location must be the overriding considerations. NCOSS fears that, due to the overwhelming demand on an already inadequate system, the policy will direct DADHC officers to simply place the person wherever there is an available vacancy regardless of its suitability. The negative impact on people with disability in this situation serves only to reduce their quality of life and create otherwise unnecessary dependencies, in turn leading to higher costs and poorer outcomes.

In the policy, DADHC retains the right to reconfigure “the accommodation of a person with high priority needs to create extra...capacity”. This means that when DADHC needs additional capacity, a person’s living arrangements can be automatically changed to accommodate more people. The solution, however, is not to simply support more people within existing resources in a system already bursting at the seams. The solution is to commit to a deliberate and planned investment strategy according to current and future population projections through a broad range of options to address a large range of needs of people with disabilities and families.

### **Conclusion**

NCOSS appreciates the opportunity to provide feedback on the DADHC Draft Allocation of Places in Supported Accommodation Policy.

Should you require any further information, please contact Samantha Edmonds, Deputy Director, Policy & Communications on 9211 2599 ext 111 or [Samantha@ncoss.org.au](mailto:Samantha@ncoss.org.au)

Yours faithfully



Alison Peters  
Director