Pg1. Discusses 'longstanding problems' and references to an ombudsman's report 2011 referring to 'allegations' and the state coroners report 2012.

To date no- one has been charged or breached on any of these allegations and as such that's how it should be treated hearsay.

As primary and secondary health care is funded and co-ordinated by adahc, case managed by adahc. The coroner's report was not just referring to the licensee.

Page 1 'Simpler and stronger framework for the delivery of quality services'

- What framework?

All I can see is reduced numbers of clients in a bedroom and maximum number of 30 people per assisted boarding house.

Reduced income means reduced money available to 'deliver a quality service'.

A reduced number of clients will see an increase in board and lodgings and the need for fee for service in relation to:

1. Call bells- installation and service.

2. Establishing a framework for records management.

Allowing enough financial resources to cover expenses incurred due to staff time, training and staff availability to establish and maintain records management in the short term and long term.

This is with the proposed reduction in income and NO FINANCIAL assistance from adahc for training, stationary, set up costs of medical, personal files and once again clients will need to pay fee for service because money is needed to pay staff to do work.

3. Minimum staffing levels: presently there is 1 staff on at all times. This has been acceptable and working. Extra staff comes in as needed or affordable by licensee. Usually licensee is 2nd staff member.

If there is forced increased staffing levels this will lead to: increased wages, workers comp and superannuation. This will all Impact on board and lodging fees.
Unless the government is advocating with new legislation, decrease the number of residents, hence with a decreased income one staff member works for a fixed income 24 hours per day 7 days a week- no time off! This hardly will ensure an enhanced standard of service. Operators and staff will need to work longer to get same wage or a decreased wage- is this what you are saying should happen - staff at assisted boarding houses are slave labour.

4. Qualifications and skills

At present- Staff are: nurses all first aid trained some have done cert 3 in disability, worked in industry for years. They don't work in an assisted boarding house if they don't have skills- it's not a job that hides incompetence. If you can't do the job your out!

5. Procedures for dealing with complaints- all assisted boarding houses have been doing this for years- we have the complaints book plus the flyers on the wall.

6. Increase in range of notifiable incidents- this is an expansion of number two- record keeping takes time, staff wages- fee for service once again client has an expense.

All of these proposed regulations might appear to be 'into line with community expectations' but remember - WE ARE NOT FUNDED, we do not have the financial capacity to facilitate and implement proposed regulations and services unless the client pays for it. All you are suggesting is that clients will pay more for a service/ regulation you are imposing. If you want the client to pay more money then tell the federal government that centre link should be giving clients who live in assisted boarding houses a 'regulation assistance money' on top of the rent assistance which any other person with a disability in Australia is eligible for. If the state government wants to impose these new rules and regulations the clients have to have the income to pay for them. Remember- general boarding residents on a disability pension are on the same rate as residents with a disability living in an assisted boarding house. This is discrimination to demand clients pay for assisted services that their pension rate has not increased for.

Even easier ask any member of the community who works in disability sector to work twice as hard for half the wage. Is this in line with your community expectation?

Australia's commitment to the United Nations convention on the rights of persons with disabilities does not say that it will try to comply with regulations in an assisted boarding house by discriminating against woman and indigenous people who work in an assisted boarding houses. Declaration of human rights is for everyone including workers. The state government is imposing direct and indirect discrimination on the workers of assisted boarding houses by imposing regulations that will impact on the viability of their workplace. You are discriminating against people with a disability who live in an assisted boarding house by not financially supporting the very regulations you want to impose. To use a paragraph from your regulatory impact statement:
'Assisted boarding houses would be required to meet the higher standards for the benefit of residents but would also face the higher costs of compliance'.

As we receive no monetary input enabling us to achieve compliance of these standards. The NSW government is implementing a regulation that would disadvantage not only the residents but knowingly setting the licensee's up to fail. Then using the obvious outcome of failure to further discredit and blame the licensees.

This is discrimination: to advocate a two tier system of accommodation for people with a disability. Residents who receive no funding and then comparing their accommodation service to those who do receive funding.

**Option A: Maintain the status quo**

Residents are paying between $700 and $750 per fortnight for full board and lodging in single, double and shared accommodation.

This is meals, clean linen, and 24 hour staff 7 days per week and complying with current standards and regulations.

To date no-one has closed as not financially viable.

Residents are receiving value for money leaving more than $200. for discretionary spending.

It is common knowledge that assisted boarding houses are not pseudo group homes.

Clients are low needs, don't need supervision in the community, staff are available for domestic services, cooking and managers do all of the above plus record keeping and the running of the business.

The only people it seems who are not satisfied with this option are the policy makers, funded service providers who want everyone with a disability to be in an non government organisation house with funding attached.

Little institutions: overseen by government.

**Option B: Maintain the status quo for existing boarding houses, and apply the new requirements under the draft Regulation to new entrants only.**

This would give the opportunity for the industry plus the government to see if the new regulations are a financially viable option without any detrimental effect on residents or proprietors.

**IF anyone does take this business proposal up the industry would change over voluntarily if it was a successful business model.**

**Option C: Implement the Boarding Houses Regulation 2013 as proposed**
Straight away I realised that even 20 people wouldn’t even cover costs.

A quick jot down of major expenses staff, insurances liability and rent needs the income of 20 residents.

Existing facilities are not designed to separate rooms into singles.

Those places that would drop to less than 20 residents will close.

The above doesn’t include elec, gas, water or FOOD. Assisted boarding houses are being ‘set up’ to fail.
Why would the government agree to large 30 room assisted boarding houses and not support places of 10 or 15 residents.

**Option D**

*Doesn’t even warrant a reply it’s impossible and only there to make us believe ‘well it could have been worse’*

**Last one out turn off the light!**

**Enforcement**

This sounds like 1940 Nazi Germany.

This is people’s homes.

People live, sleep and eat in these homes.

“Enforcement officers can enter at ANY TIME” - What are you implying

Is happening?

Are you going to flash torchlight’s in people’s faces whilst they are in bed?

Get people out of bed for a roll call?

“The power to require answers to their questions?”

‘Ability to impose penalties for non-compliance”

What country are we living in?

How this has even been passed to be included as a regulation is beyond belief?

This should be reported as a proposed crime against human rights and anti-discrimination.

This is an appalling way to treat people.

Higher penalty fees will only take away income needed to rectify said breaches.

Our income is from board and lodging fees.

After everything is paid, money goes to upkeep, repairs, replacement.

Fines will only be detrimental to the residents.

For example: If a licensee gets fined due to a resident smashing a window.

Instead of a $100 glazier bill it will come with a $1500. fine on top from adahc.
I think in these situations the breach fine will be passed onto the resident.

This would be intolerable to function under these circumstances. Once again your intent, e.g. improve standards won’t be the outcome.

Any breaches that are due to resident’s behaviour will be passed on to resident.

### 3.2.2.6 Benefits local communities

For the last 25 years boarding houses has been used to make pleas for Government funding.

People who work in assisted boarding houses, services and families involved with boarding houses know the reality of the boarding house industry which is

‘Thank God, you’re here. You do a wonderful job”

Public perception is instigated by sycophant charity dollar grabbers!

How can they do their ‘fantastic’ job of saving all these ‘poor vulnerable people’ unless there is a ‘bad guy’, yes: the boarding house managers! How tired am I hearing ‘Oh, it’s not you-it's this other manager?

Apparently there are only 13 of these so called bad guys left.

Not enough to keep the ‘adahc, charity boarding house saviour’s’ sector in a job!-but wait.

Perhaps they will be kept busy now in the ‘general boarding houses’-Oh those poor vulnerable residents.

How many you say 20, 000 people! That should keep them busy for a while!

Adahc had 17 years to help people in general boarding houses but choose to do so when there were only 13 licensees or 23 assisted boarding houses left.