Draft Boarding House Regulations 2013

Newtown Neighbourhood Centre has been concerned about the conditions of both general (Unlicensed) and Assisted (Licensed Boarding Houses) for many years. The organisation runs services that work in both types of properties, such as Active Linking Initiative (ALI), Boarders and Lodgers project and Boarding House Outreach Project. We welcome this opportunity to respond to the draft regulations.

We are largely in support the proposed regulations, but raise the following comments and observations, based on interactions with relevant NNC staff, and feedback from both operators and occupants of boarding houses. This is not withstanding the inherent contradictions of a framework that allows some of the communities most vulnerable members to be cared for within the for private sector, where profit margins will always inform quality measures and improvements.

Single Occupancy Rooms.
We welcome the desire of moving to single rooms, but recommend consideration to the safeguards required to protect occupants from abuse ‘behind closed doors’.
-Related to this the importance of criminal record checks becomes irrefutable

Staffing
We welcome this proposal, but feel there should be clarification and or guidance around the need for waking staff cover, or just a staff member in site. This may need to be determined on a case by case basis.
-Ideally all staff would be trained in First Aid procedures.
-Staff members should be at least 18 years of age (the proposed 16 years is not appropriate for an environment with vulnerable people)
-Volunteers should also be subject to criminal record checks

Maximum number of residents / sleeping arrangements
-We welcome the proposal for maximum numbers in a property, and the proposals for sleeping arrangements. Five years should be sufficient time to transition to a maximum occupancy of 30 where this is required. Further consideration should be given to reducing maximum numbers incrementally over a following five year period.
-If rooms are individually lockable consideration should be given to the provision of an emergency alarm system in each room or extending call bells. This will also be a safeguard against the potential for abuse and in the event of an emergency.
State of premises
- Consideration to the requirement for establishments to have planned maintenance programs to ensure ongoing acceptable standards of good repair, decoration and hygiene
- We welcome the opportunity for all residents to have access to lockable storage

Lifestyle
- The requirement to provide information to residents of support services available should be ongoing, or specified as annually. This information may currently be provided (once only) at induction, and there should be ongoing commitment to do so.

Health and Well being:
- Clause 27.7 – insert ‘or returned to prescribing health professional’
- The administration of medication must only be carried out by a trained staff member. Medications should not be given to other agencies (such as ALI workers) to administer.
- Clause 28 (8) – insert additional clause iii “or mental health crisis of emergency team”

Div 2 health monitoring;
- Additional needs resident should be advised of their right to choose their own health care providers.
- Clause 29 (c) – insert “and assisted” after ‘residents are encouraged....

- Clause 30 (c) – should contain a time frame, 12 or 24 hours.

Food and Nutrition
- Clause 31 (d) insert “with due regard to individuals health and wellbeing. We fell this is required to protect against compulsive behaviours which may be detrimental to individuals health and well being.

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