

17 January 2024

Committee Secretary
Community Support and Service Committee
Parliament House
George Street
Brisbane QLD 4000

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

Inquiry into the Provision and Regulation of Supported Accommodation in Queensland

Dear Committee Secretary

Thank you for the opportunity to provide input into the Committee's Inquiry into the Provision and Regulation of Supported Accommodation in Queensland.

As members of the Committee are aware, as the Public Advocate for Queensland, I undertake systemic advocacy to promote and protect the rights and interests of Queensland adults with impaired decision-making ability.¹ There are several conditions that may affect a person's decision-making ability, including intellectual disability, acquired brain injury, mental illness, neurological disorders (such as dementia) or alcohol and drug misuse. While not all people with these conditions will experience impaired decision-making ability, many of them will at some point in their lives. For some, impaired decision-making ability may be episodic or temporary, requiring intensive supports at specific times, while others may require lifelong support with decision-making and communicating their wishes and preferences.

While there is limited publicly available information on the people who reside in supported accommodation in Queensland, it is likely that many residents have a disability or mental health condition that affects their decision-making ability.

As members of the Committee are aware, I recently completed a report titled '*Safe, secure and affordable*'? *The need for an inquiry into supported accommodation in Queensland*. This report sought the holding of this inquiry. It also identified critical issues in the sector and posed 29 questions relating to the current regulation and oversight of the complex supported accommodation system.

This submission makes nine recommendations, which address a number of the questions posed in my report and that the Committee might consider adopting in its final report. This includes recommendations that could be implemented over the short and medium term.

I discussed a number of these topics in my evidence before the Committee at its Public Hearing on 13 December 2023 and in my response to a question on notice posed at this hearing. This submission includes additional details and recommendations in relevant areas.

This inquiry is taking place during a time of significant discussion and reform in the disability sector more broadly, with recent recommendations from the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (Disability Royal Commission) and the Independent Review of the NDIS also under consideration by governments.

While the reforms that are implemented following these reviews will likely affect the lives of a number of people living in supported accommodation, it is also critical that attention is given to the unique needs and circumstances of this cohort. People using these services are often those whose needs

¹ *Guardianship and Administration Act 2000* (Qld) s 209.

have not been appropriately met through other systems due to issues with availability of, or access to, services.² Many residents may also need additional support to maintain their preferred housing and support arrangements. Specific reforms to address the needs and circumstances of residents in supported accommodation are required to ensure that they do not continue to ‘fall through the gaps’.

Within this submission, I use the term ‘supported accommodation’ to refer not only to level 3 residential services as defined by the *Residential Services (Accreditation) Act 2002* (Qld), but also other shared living arrangements such as level 1 and 2 residential services, and accommodation arrangements which have been made possible through the introduction of the National Disability Insurance Scheme (NDIS).

Recommendations

The committee could consider adopting the following recommendations:

Recommendation 1: The Queensland Department of Housing, Local Government, Planning and Public Works should undertake a census of the support needs of residents living in accredited level 3 residential services. The census should ask providers of accredited level 3 residential services to identify:

- the number of residents currently residing in accredited level 3 residential services;
- the number of residents who are actually receiving level 3 services;
- the general nature of the disability and other support needs of residents; and
- the number of residents who are current National Disability Insurance Scheme participants.

Recommendation 2: The Queensland Department of Housing, Local Government, Planning and Public Works should require providers of accredited level 3 residential services to arrange for individual independent assessments of the housing and support needs of all new residents, and bi-annual assessments of the housing and support needs of existing residents.

Recommendation 3: The Queensland Government should fund and oversee the provision of case management services to supported accommodation residents who currently have significant unmet support needs.

Recommendation 4: The Queensland Government should review the efficacy of retaining the current levels of residential services accreditation in view of the development over the past decade of relevant federal and state support schemes, including the National Disability Insurance Scheme.

Recommendation 5: The Queensland Government should establish a new supported accommodation regulator which should have the primary roles of:

- regulating existing level 2 and level 3 residential services (and any new comparable category of residential service); and
- monitoring, in collaboration with relevant state and federal regulatory agencies, the adequacy of support services received by residential services residents, including support services provided through the National Disability Insurance Scheme.

Recommendation 6: The Queensland Government should require the supported accommodation regulator to adopt a person-centred regulatory approach. This approach should concentrate on the adequacy of the services being received by residents and should be developed through engagement with relevant legislative and quality assurance standards, including the *Human Rights*

² Public Advocate (Qld), ‘Safe, secure and affordable’? *The need for an inquiry into supported accommodation in Queensland*, August 2023, p. 20.

Act 2019 (Qld), the Human Services Quality Framework and the United Nations Convention on the Rights of Persons with Disabilities.³

The person-centred regulatory approach should:

- ensure that residents are receiving adequate support services;
- require routine onsite assessment of the services provided utilising a human services quality framework based approach;
- involve robust collection of the views of residents about the services they are receiving; and
- implement Recommendation 7.38 from the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability and require supported accommodation providers to: 'develop support plans for each resident, covering personal care, financial management, medication management, and the use of restrictive practices'; and 'keep up-to-date records of how services are delivered in line with support plans, to allow regulatory bodies to more effectively monitor the quality of supports and services'.⁴

Recommendation 7: The Queensland Government should develop new supported accommodation design principles and standards following a broad consultation process. The design principles and standards should, among other things:

- articulate the rights of residents (including the right to privacy); and
- promote the ability of residents to establish and maintain social connections.

Recommendation 8: The Queensland Government should adopt a supported accommodation safeguarding framework that incorporates the following elements:

- quarterly visits by Community Visitors, with clear escalation pathways for issues and complaints to appropriate agencies, including the supported accommodation regulator;
- improved information sharing practices and expectations among prescribed agencies, as recommended in the Public Advocate's Adult Safeguarding in Queensland report (vol. 2, rec. 9);⁵ and
- the clear regulation of restrictive practices in supported accommodation settings, utilising a Senior Practitioner authorisation model.

Recommendation 9: The Queensland Government should develop a specific supported accommodation investment program, consistent with the variety of transformational investment and other opportunities identified in the Queensland Housing Strategy 2017-2027.

These recommendations are discussed in further detail below.

Short-term

1. Sector census

As noted in '*Safe, secure and affordable*'?, there is limited information available on the characteristics of residents living in residential services in Queensland, the services that they receive, and their pathways in to and out of residential services.⁶

³ United Nations. *Convention on the rights of persons with disabilities*, GA Res 61/106, 76th plen mtg, UN Doc A/RES/61/106 (adopted on 13 December 2006).

⁴ Commonwealth Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, *Final report Volume 7, Inclusive education, employment and housing - Summary and recommendations* (2023) p. 39.

⁵ Public Advocate (Qld), *Adult Safeguarding in Queensland, Volume 2: Reform recommendations*, November 2022, p. 43.

⁶ Public Advocate (Qld), '*Safe, secure and affordable*'? *The need for an inquiry into supported accommodation in Queensland*, August 2023, pp. 19-20.

The advent of the NDIS has also seen a complex diversification of forms and sources of support. To take one example of this complex support picture, many current residents of accredited level 3 residential services are not actually receiving level 3 services but are receiving NDIS-funded support (see section 4 for further discussion of this point).

Conducting a wide-ranging census of the current support needs and provision of services to residential services residents, including services accessed through other systems (e.g., NDIS, aged care, mental health), would support a better understanding of the sector, the people who use these services, and the systems with which residents interact. This census could be repeated every five years to provide regular information about the sector.

This information will be important to inform further sector reform.

Recommendation 1: The Queensland Department of Housing, Local Government, Planning and Public Works should undertake a census of the support needs of residents living in accredited level 3 residential services. The census should ask providers of accredited level 3 residential services to identify:

- the number of residents currently residing in accredited level 3 residential services;
- the number of residents who are actually receiving level 3 services;
- the general nature of the disability and other support needs of residents; and
- the number of residents who are current National Disability Insurance Scheme participants.

The development and implementation of a sector census relates to questions 1, 2, 20 and 21 in the *'Safe, secure and affordable'?* report.

2. Individual independent assessments of housing and support needs

To ensure that the needs of residents in residential services can be appropriately met with the provision of level 3 residential services (which includes personal care), individual independent assessments of the housing and support needs of people entering residential services should be introduced. These assessments should then be conducted on a bi-annual basis for existing residents to assess whether their support and accommodation needs are still being met.

In addition to inquiring about support needs, the individual independent assessment process should ask residents about their preferences, including whether they wish to remain living in their current accommodation setting.

All assessments would therefore need to be conducted by an independent agency or organisation that is not the residential service provider and is not associated with the residential service provider.

Level 3 residential service providers could be paid an administrative fee to facilitate and coordinate the assessment process.

The independent assessors could be selected from a panel convened by the Department of Child Safety, Seniors and Disability Services. Such a process could begin with an obligation on providers in relation to all people living in accredited level 3 residential services; but potentially this could be expanded to cover people living in accredited level 2 residential services.

The results of these assessments could also, with the permission of residents (and potential residents), be provided to the relevant residential service provider to enable the development of personalised

support plans for residents (see recommendation 6 below, and recommendation 7.38 from the Disability Royal Commission⁷ for further information about support plans).

Recommendation 2: The Queensland Department of Housing, Local Government, Planning and Public Works should require providers of accredited level 3 residential services to arrange for independent assessments of the housing and support needs of all new residents, and bi-annual assessments of the housing and support needs of existing residents.

The introduction of individual independent assessments for residents relates to questions 19 and 20 in the *'Safe, secure and affordable'?* report.

3. Case management

Many residents in residential services access, or need to access, services across multiple systems.⁸ Many residents have difficulty navigating these systems and supports and, as a result, likely have significant unmet needs.

The introduction of a targeted case management program would help to support residents of residential services with unmet support needs, as identified through the individual independent assessment process recommended above.

While the criteria for access to any new case management offerings in Queensland would need to be determined (and not duplicate any NDIS-funded support coordination currently being provided to residents), a carefully targeted approach would likely prove cost-neutral, were one to factor in the health care costs, and other costs to the state, if people's support needs are not being met. The possible threshold criterion here might be that the person is living in a residential service and currently has significant unmet support needs (identified during their independent assessment process).

Case management might involve the provision of assistance in identifying, and linking people in with, appropriate support services across a range of systems including accessing the NDIS, aged care, health, housing, and homelessness services. It might also involve providing a resident with assistance to find alternative accommodation where the person indicates an interest in moving elsewhere, and, for instance, if their health and social support needs might be better met elsewhere. For this reason, as with the individual independent assessments recommended above, it would be important for the case management services to be provided by an independent organisation, rather than the residential service provider or a closely related entity.

Recommendation 3: The Queensland Government should fund and oversee the provision of case management services to supported accommodation residents who currently have significant unmet support needs.

The introduction of a case management model relates to questions 21, 22 and 29 in the *'Safe, secure and affordable'?* report.

⁷ Commonwealth Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, *Final report Volume 7, Inclusive education, employment and housing- Summary and recommendations* (2023) p. 39.

⁸ Public Advocate (Qld), *'Safe, secure and affordable'?* *The need for an inquiry into supported accommodation in Queensland*, August 2023, p. 42.

Medium term

4. Review residential services accreditation levels

The advent of the NDIS has significantly affected the delivery of personal care and support services in the residential services sector.

Some supported accommodation providers that are accredited for the provision of level 3 personal care services may not be providing these services to many residents, who may instead be receiving daily living assistance, including personal care services, through NDIS-funded services.

Despite not providing personal care services to residents, some service providers may choose to retain level 3 accreditation due to the land tax exemption that applies to 'a residential service accredited at level 3 under the *Residential Services (Accreditation) Act 2002*'.⁹

Other providers may choose to reduce their accreditation from level 3 to level 1 (or level 1 and 2) only. However, this means that these residential services are not visited by Community Visitors, which are a critical safeguard in these settings.¹⁰

Given the changes to state and federal support schemes that have occurred, and the implications of this for the current accreditation system levels, the levels of accreditation should be reviewed to determine whether they are still suitable to ensure residents receive quality accommodation and supports.

Recommendation 4: The Queensland Government should review the efficacy of retaining the current levels of residential services accreditation in view of the development over the past decade of relevant federal and state support schemes, including the National Disability Insurance Scheme.

The proposed review of residential services accreditation levels relates to question 1 in the 'Safe, secure and affordable'? report.

5. Supported accommodation regulator

The regulation of supported accommodation is complex, and there is often no clear, single agency with the responsibility of responding to issues that arise in these settings. This can lead to poor outcomes for residents.

A new supported accommodation regulator should be established to regulate existing level 2 and 3 residential services, as well as any new comparable categories of residential services.

In addition to exercising current regulatory responsibilities, the new regulator could take on a broader role of overseeing, and inquiring into, the provision of services to residents via multiple service streams. This could include monitoring, and responding to concerns about, service providers and closely aligned entities providing the same or similar services via multiple funding schemes. To adequately investigate concerns about providers, the regulator would need to have a close working relationship with other regulators, such as the NDIS Quality and Safeguards Commission and the Age Care Quality and Safety Commission.

The regulator could also oversee the person-centred regulatory approach proposed below (recommendation 6) and monitor the reasonableness of fees that are charged to residents.

⁹ *Land Tax Act 2010* (Qld) s 51A.

¹⁰ Public Advocate (Qld), 'Safe, secure and affordable'? *The need for an inquiry into supported accommodation in Queensland*, August 2023, p. 35.

A regulated fees and charges schedule for residential services in Queensland is not currently in place, as exists for other forms of accommodation like public and community housing. This means that all fees and charges are decided by individual providers and can vary significantly.

Should pricing regulation be implemented, the pricing limits employed for other forms of accommodation (like Specialist Disability Accommodation and public housing) could inform the regulation of these costs for residents.

Recommendation 5: The Queensland Government should establish a new supported accommodation regulator which should have the primary roles of:

- regulating existing level 2 and level 3 residential services (and any new comparable category of residential service); and
- monitoring, in collaboration with relevant state and federal regulatory agencies, the adequacy of support services received by residential services residents, including support services provided through the National Disability Insurance Scheme.

The introduction of a new supported accommodation regulator relates to questions 3 and 13 in the 'Safe, secure and affordable'? report.

6. Person-centred regulation

The current approach to the regulation of residential services focuses on the services being delivered by service providers, with a particular focus on the housing aspects of services.¹¹ There are a range of challenges with the current regulatory approach which will only become more prominent as new models of supported accommodation emerge.

A shift to a more person-centred approach, which focuses on the person and how well their needs and rights are being met, is critical.

An example of how the regulation could become more person-centred is through the inclusion of elements of a human services approach to regulation. This could include, for example, the adaptation of items from the Human Services Quality Framework developed by the Department of Child Safety, Seniors and Disability Services to assist in assessing and improving the quality of services provided.¹²

Several of the other recommendations for reform identified in this submission would also contribute to a more person-centred approach to regulation of the sector, including the introduction of an Adult Safeguarding Commissioner in Queensland, and individual independent assessments and case management for eligible residents.

Recommendation 6: The Queensland Government should require the supported accommodation regulator to adopt a person-centred regulatory approach. This approach should concentrate on the adequacy of the services being received by residents and should be developed through engagement with relevant legislative and quality assurance standards, including the *Human Rights Act 2019 (Qld)*, the Human Services Quality Framework and the United Nations *Convention on the Rights of Persons with Disabilities*.¹³

¹¹ Public Advocate (Qld), 'Safe, secure and affordable'? The need for an inquiry into supported accommodation in Queensland, August 2023, pp. 30-31.

¹² Department of Seniors, Disability Services and Aboriginal and Torres Strait Islander Partnerships, *Human Services Quality Framework, Measuring quality, improving services*, version 8.1, 2022.

¹³ United Nations. *Convention on the rights of persons with disabilities*, GA Res 61/106, 76th plen mtg, UN Doc A/RES/61/106 (adopted on 13 December 2006).

The person-centred regulatory approach should:

- ensure that residents are receiving adequate support services;
- require routine onsite assessment of the services provided utilising a human services quality framework based approach;
- involve robust collection of the views of residents about the services they are receiving; and
- implement Recommendation 7.38 from the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability and require supported accommodation providers to: 'develop support plans for each resident, covering personal care, financial management, medication management, and the use of restrictive practices'; and 'keep up-to-date records of how services are delivered in line with support plans, to allow regulatory bodies to more effectively monitor the quality of supports and services'.¹⁴

The proposed person-centred regulatory approach is a response to questions 5, 6, 13, 18, and 24 in the 'Safe, secure and affordable'? report.

7. Design standards

Many stakeholders consulted for the 'Safe, secure and affordable'? report indicated that while minimum building standards are included within the current regulatory requirements, many residential service settings are not optimally supportive of residents' rights to autonomy, privacy and independence.¹⁵

As I discussed in my evidence to the Committee during the Public Hearing on 13 December 2023, an important question for the future of supported accommodation in Queensland is whether it is acceptable to have state regulated accommodation where a large number of residents are housed in a single location with shared bedrooms, bathrooms and living areas, which often give these settings an institutional feel.

New supported accommodation design principles and standards should be developed following a broad consultation process that includes seeking the views of current and past supported accommodation residents.

The standards should complement existing building and fire safety standards, and should optimise the ability of residents to have their rights met, and their ability to establish and maintain social connections. The standards should also ensure that residential facilities allow for residents to remain in place during human biosecurity emergencies like the recent COVID-19 pandemic.

Recommendation 7: The Queensland Government should develop new supported accommodation design principles and standards following a broad consultation process. The design principles and standards should, among other things:

- articulate the rights of residents (including the right to privacy); and
- promote the ability of residents to establish and maintain social connections.

This relates to questions 1 and 5 in the 'Safe, secure and affordable'? report.

¹⁴ Commonwealth Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, *Final report Volume 7, Inclusive education, employment and housing- Summary and recommendations* (2023) p. 39.

¹⁵ Public Advocate (Qld), 'Safe, secure and affordable'? *The need for an inquiry into supported accommodation in Queensland*, August 2023, pp. 30-31.

8. Safeguards

In addition to the introduction of a new supported accommodation regulator (see recommendation 5) there are a number of opportunities to improve safeguards for residents living in supported accommodation.

Community Visitors

Community Visitors currently visit level 3 residential services every six months for scheduled visits and more frequently if there has been an issue identified.¹⁶

A more frequent visitation schedule would be beneficial, potentially quarterly, coupled with a significant proportion of visits being conducted unannounced, so that Community Visitors are able to form a more complete picture of the operation of the particular residential service. There would also be benefit in identifying ways of promoting greater interaction between Community Visitors and supported accommodation residents.

Due to the development of new models of accommodation and service support, including those provided with NDIS funding, there are challenges with the current criteria for 'visitable sites' that prevent Community Visitors from visiting some supported accommodation residents who would benefit from their visits.¹⁷

A shift from 'visitable sites' to 'visitable persons' could be considered, as this would reflect a more person-centred approach to safeguarding. This could also help to ensure that there is independent on-site monitoring in relation to at-risk adults, particularly in new and emerging models of accommodation, and assistance in raising or escalating concerns about their wellbeing.

Adult Safeguarding Commissioner

The current safeguarding framework for level 3 residential services in Queensland would be significantly strengthened with the establishment of an adult safeguarding agency, led by an independent Adult Safeguarding Commissioner, as recommended in my *Adult Safeguarding in Queensland* report.¹⁸

The final reports from the Disability Royal Commission¹⁹ and the Independent Review of the NDIS²⁰ also recommended the introduction of adult safeguarding bodies in each state and territory where these do not yet exist.

The Adult Safeguarding Commissioner would be able to register and act on concerns about the wellbeing of any 'at-risk adult', a term defined to refer to people whose 'care and support needs' put them at risk of abuse and neglect. Many residents of supported accommodation would come within this categorisation.

Information sharing

A crucial component of safeguarding involves the sharing of relevant information with, and by, prescribed safeguarding agencies.

¹⁶ Evidence to Community Support and Services Committee, Queensland Parliament, Brisbane, 13 December 2023, p. 13 (Shayna Smith, Public Guardian).

¹⁷ Public Advocate (Qld), 'Safe, secure and affordable'? The need for an inquiry into supported accommodation in Queensland, August 2023, p. 35.

¹⁸ Public Advocate (Qld), *Adult Safeguarding in Queensland, Volume 2: Reform recommendations*, November 2022, p. 37.

¹⁹ Commonwealth Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, *Final report Volume 11, Independent oversight and complaint mechanisms* (2023) p. 47.

²⁰ Commonwealth of Australia, Department of the Prime Minister and Cabinet, *Working together to deliver the NDIS - Independent Review into the National Disability Insurance Scheme: Final Report*, 2023, p. 12.

In *Adult Safeguarding in Queensland, Volume 2*, I recommended that:

Prescribed agencies should be authorised to provide personal information about at-risk adults to other prescribed agencies in circumstances where the provider of the information reasonably believes that the information will assist the recipient:

- to exercise an official function concerning the safety or wellbeing of an at-risk adult; or
- to address a concern about the safety or wellbeing of an at-risk adult that has arisen in the course of the provision of services to the adult.²¹

This would enable the sharing of information to safeguard supported accommodation residents, many of whom would meet the definition of an 'at-risk adult'.

Restrictive practices framework

I am concerned that restrictive practices are not being appropriately authorised and used in residential services.²²

In Queensland, the current consent-based model for the authorisation of restrictive practices is complex and creates significant confusion.²³

The implementation of a senior practitioner model, which I have discussed in several publications including a reform options paper titled *Improving the regulation of restrictive practices in Queensland: a way forward*,²⁴ could overcome a number of the inadequacies of the consent-based model.

A senior practitioner model was also recommended by the Disability Royal Commission in its final report.²⁵

I note that a review of the framework for the authorisation of restrictive practices in disability services is currently underway in Queensland.

Recommendation 8: The Queensland Government should adopt a supported accommodation safeguarding framework that incorporates the following elements:

- quarterly visits by Community Visitors, with clear escalation pathways for issues and complaints to appropriate agencies, including the supported accommodation regulator;
- improved information sharing practices and expectations among prescribed agencies, as recommended in the Public Advocate's *Adult Safeguarding in Queensland* report (vol. 2, rec. 9);²⁶ and
- the clear regulation of restrictive practices in supported accommodation settings, utilising a Senior Practitioner authorisation model.

This relates to questions 13 and 27 in the 'Safe secure and affordable'? report.

²¹ Public Advocate (Qld), *Adult Safeguarding in Queensland, Volume 2: Reform recommendations*, November 2022, p. 43.

²² Public Advocate (Qld), 'Safe, secure and affordable'? *The need for an inquiry into supported accommodation in Queensland*, August 2023, pp. 46-47.

²³ The Public Advocate (Qld), *Improving the regulation of restrictive practices in Queensland: A way forward, reform options paper*, 5 October 2021.

²⁴ The Public Advocate (Qld), *Improving the regulation of restrictive practices in Queensland: A way forward, reform options paper*, 5 October 2021.

²⁵ Commonwealth Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, *Final report Volume 6, Enabling autonomy and access* (2023) p. 33.

²⁶ Public Advocate (Qld), *Adult Safeguarding in Queensland, Volume 2: Reform recommendations*, November 2022, p. 43.

9. Government investment

The quality of supported accommodation settings and services would also be improved by greater investment by the Queensland Government.

The underwriting principle for such increased government investment in the supported accommodation sector should be the assurance that supported accommodation residents are included in the Housing Strategy's objective that 'Every Queenslander has access to a safe, secure and affordable home that meets their needs and enables participation in the social and economic life'²⁷ of Queensland.

Support here could involve a range of activities; from the purchase of entire sites (and engagement of contracted service support agencies), through to support for capital works on existing structures (that would, for instance, enable residents to have their own bedrooms and bathrooms).

In developing the investment program, the Queensland Government should also consider the range of planning concessions, taxation relief, and other supports that could be, or are currently being, provided to level 3 residential services.

Recommendation 9: The Queensland Government should develop a specific supported accommodation investment program, consistent with the variety of transformational investment and other opportunities identified in the Queensland Housing Strategy 2017-2027.

This relates to questions 1 and 2 in the 'Safe, secure and affordable'? report.

Thank you for the opportunity to contribute to this inquiry. Should you require any clarification on the issues raised in this submission, or would like to discuss any of them further, please do not hesitate to contact my office on 07 3738 9513 or public.advocate@justice.qld.gov.au.

In addition, I would be very happy to again appear before the Committee to discuss this submission and my earlier report if that would be beneficial.

Yours sincerely



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Public Advocate

²⁷ Queensland Government (Department of Housing and Public Works), *Queensland Housing Strategy 2017-2027*, p. 5.