



29 April 2011

Commissioner Patricia Scott  
Inquiry into disAbility care and support  
Productivity Commission  
GPO Box 1428  
Canberra City ACT 2601

By email: [disability-support@pc.gov.au](mailto:disability-support@pc.gov.au)

Dear Commissioner,

**Disability care and support**

Thank you for the opportunity to lodge this submission to the draft report, Disability care and support.

**About Abbeyfield Australia**

Abbeyfield Australia is the peak body representing 29 Abbeyfield Associations and Branches in Tasmania, Victoria, NSW, the ACT, Queensland and South Australia. Our forte is community based affordable housing. We do it well and provide comfortable, secure and attractive accommodation by leveraging strong local volunteer management on the strength of the national Abbeyfield framework.

We understand that the demand is great for affordable community housing for adults with a physical and /or intellectual disability. We also understand that adults with a disability also want the choice to live with independence within their community whilst having access to support services.

The Abbeyfield community based housing model is flexible and is being used successfully to provide group housing for adults with mild and moderate intellectual disabilities. The Abbeyfield model is an option amongst a range of very good accommodation models. It provides attractive, comfortable and stable accommodation with some low level day to day domestic assistance.

We also believe that any accommodation model must reflect the wants of the individual and encourage a culture of independence rather than foster continuing dependence.

**Strong advocacy bodies**

Abbeyfield Australia supports the view that the disAbility sector is very broad and diverse and needs strong advocacy bodies with the skills and resources to effectively represent the sector. We would like to see these advocacy bodies being assured long term funding through the National Disability Insurance Scheme (NDIS) so as to enshrine their independence and strength of voice. (Such strength is rarely achieved when linked to regular funding applications at the behest of a political process.)

Funding levels should be set at a level which reflects the additional costs of advocating for such a diverse constituency, and also the historical under-funding of the sector by successive governments.

### **Accommodation versus support**

A critical premise for Abbeyfield Australia is that housing for people with a disability, particularly those with a mild or moderate disability, is a housing issue not a disability support issue. We also believe that residents are best placed to choose where they want to live and from whom they may wish to receive support services.

In this regard we particularly echo the submission to the Productivity Commission by the Australian Federation of Disability Organisation (AFDO) (August 2010, page 38) in urging the functional separation of accommodation from home support, so that people living in group homes and other residential settings have a genuine range of choice about where, and with whom, they live.

### **Funding for a disability care and support scheme**

Abbeyfield Australia supports the proposal for a NDIS to provide support to all Australian residents and citizens with a disability and sees a levy akin to the current Medicare levy as an ideal mechanism to achieve this.

Abbeyfield Australia also supports the AFDO approach that:

- the system be based on a specific levy of Australian taxpayers, with scope for growth and change as necessary, and protection from financial downturns to ensure stability of support as much as possible
- the scheme be funded to cover all people with a disability
- the scheme be a no-fault, National Disability Insurance Scheme based on principles of equity and efficiency
- the scheme be costed in a way which takes into account the savings made through increased participation and wellbeing.

### **Accessing capital funding from the NDIS**

Abbeyfield Australia believes that the NDIS should be available to provide capital funding to not-for-profit housing providers for the construction of group house accommodation for people with a disability.

We argue that this NDIS funding is warranted due to the unique difficulty in accessing commercial capital finance for group houses. Capital finance for group housing is problematic because the market value of a group home (such as an Abbeyfield House ) is in most instances significantly less than its cost of construction. This makes potential lenders reluctant to lend capital funds.

By contrast however, taken over a 25 year life cycle cost of constructing and operating a comfortable and attractive Abbeyfield group house is approximately 10 per cent of the cost of other group housing or fully independent living options. (Narrabri Abbeyfield disAbility House – feasibility study 2009, pages 30-31)

Yours sincerely,

**Chris Reside**  
Chief Executive Officer  
Abbeyfield Australia