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Tuesday, 20 June 2017

Dear Sir/ Madam,

I refer to the National Disability Insurance Scheme (NDIS) Code of Conduct discussion paper. CHIA welcomes the publication of the discussion paper and the opportunity to make comment.

CHIA is the peak industry body for the community housing sector in Australia. CHIA is funded by its member organisations, which between them own or manage over 60,000 affordable rental properties across every state and territory in Australia.

It represents the growth provider with a portfolio of 5,000 properties, the small organisation which exists solely to manage the 13 properties which it owns, as well as the organisation which provides affordable housing as an adjunct to specialist services such as mental health or disability support.

Community housing is home to thousands of Australians with a disability. As such, the sector has a material interest in the progress of the NDIS and the proposed Code of Conduct.

CHIA supports the draft Code of Conduct detailed in the discussion paper and does not wish to offer substantive comment on it.

CHIA is concerned, however, about regulatory duplication. The community housing sector is already subject to a comprehensive regulatory structure; principally the National Regulatory system for Community Housing (NRSCH) and closely related State based regulatory systems. Put simply, CHIA believes that any future Code of Conduct that applies to community housing providers should have regard for regulations that CHPs are already subject to and that regulatory and reporting duplication is minimised.

Please note that in the recent past the community housing sector has been subject to different sets of regulatory obligations where unnecessary regulatory duplication occurred and which acted as a significant burden on providers. CHIA is keen to ensure that that does not happen as part of the NDIS roll out.

Once again, CHIA welcomes the publication of the discussion paper and the opportunity to provide feedback as a key stakeholder in the development of the NDIS.

Yours faithfully,

Peta Winzar Chief Executive Officer.