

20 September 2011

Australian Human Rights Commission  
GPO Box 5218  
SYDNEY NSW 2001

Dear Sir/Madam

**Re: Licensed Residential Centres and the Age Discrimination Act 2004**

This is a very brief submission in support of the application by Ageing, Disability and Home Care NSW (ADHC) for an exemption, in relation to its screening tool for admission to Licensed Residential Centres (LRCs), from the Age Discrimination Act 2004.

The Tenants' Union of NSW is the State's peak tenancy organisation and specialist tenancy community legal centre. We are in close contact with advocates for residents of LRCs at People with Disability Australia, and have had some contact with residents of LRCs directly.

We support the application. Licensed residential centres are not suitable places of accommodation for minors. To be frank, the thought of a minor living in an LRC is horrifying. All too often, LRCs reproduce the segregation, exploitation and abuse of the large institutions they were meant to replace.

We believe that there is no place in the future of our housing system for these institutionalising places. While they are allowed to continue to operate, LRCs should be subject to a regime of close monitoring and compliance with standards. A screening tool that excludes minors from LRCs is part of such a regime.

Yours sincerely

Dr Chris Martin  
Senior Policy Officer