

**Submission  
No 33**

## **TENANCY MANAGEMENT IN SOCIAL HOUSING**

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**nsw** Federation of  
Housing Associations **inc**

**New South Wales Legislative Assembly  
Public Accounts Committee**

**Inquiry into tenancy management  
in social housing**

Submission prepared by the  
NSW Federation of Housing Associations

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# Table of contents

<b>Summary of recommendations</b>	<b>2</b>
<b>1. Introduction</b>	<b>3</b>
About the Federation	3
About community housing	4
<b>2. Community housing: ideal managers of social housing</b>	<b>6</b>
<b>3. The full range of activities required for effective social housing tenancy management</b>	<b>11</b>
The social housing tenant cohort	11
Sustaining tenancies	13
Responding to local needs through in-house expertise and external partnerships	14
Current approaches to understanding the range of activities	17
<b>4. The complexity of costing social housing tenancy management</b>	<b>21</b>
<b>5. The outcomes sought by government</b>	<b>24</b>
Outcomes for tenants	24
Outcomes for Government	24
Unlocking the potential of community housing	25
<b>References</b>	<b>29</b>

# Summary of recommendations

## Recommendation 1

The NSW Government to work with the community housing industry to establish benchmarks to measure the effectiveness of social housing tenancy management which identify the full range of outcomes sought and which do not prioritise cost over other outcomes.

## Recommendation 2

The NSW Government to finalise and publish work on the range of activities required to undertake effective social housing management, and to work with the community housing industry to develop meaningful costings and performance indicators.

## Recommendation 3

The NSW Government to release the Social Housing Policy for consultation, and ensure that it leads to an explicit statement regarding the growth and further diversification of community housing into the future.

## Recommendation 4

The NSW Government and community housing industry to work in partnership to establish a large scale tenanted property transfer program, which exceeds the Housing Ministers' benchmark of 35 percent, to support the effective management of social housing tenancies and properties.

## Recommendation 5

The NSW Government and community housing industry to work in partnership to establish a new approach to the transfer of title to community housing, in order to support the expansion of the social and affordable housing system.

## Recommendation 6

The NSW Government to require all non-government managers of social housing tenancies or properties to achieve registration under the National Regulatory System for Community Housing, in order to ensure to give assurance to tenants, Government and the public.

# 1. Introduction

## About the Federation

The NSW Federation of Housing Associations (the Federation) is the industry peak body for community housing providers in NSW. The Federation was founded in 1993 to represent the interests of professional community housing organisations – then commonly known as housing associations – and to provide support and resources for their further development. Over the past 20 years, the Federation has expanded its business to anticipate and respond to the needs of its members and stakeholders, and to support the organisation's independence and viability. The Federation's members consist primarily of the largest community housing providers operating in NSW – between them they manage over 95 percent of the community housing portfolio in this State.

The Federation's purpose is to support the development of a not for profit rental housing sector which compares to any around the world, and which makes a difference to the lives of lower income and disadvantaged households across the state. The Federation seeks to ensure that community housing providers are active in all housing markets, providing a full range of housing products.

The organisation's approach is to provide leadership to the community housing industry in NSW by drawing on the talents of the industry, its leading edge practice, and on evidence from research and examples around the world. The Federation represents the aspirations and interests of community housing to all other stakeholders – government, industry and the wider community. This includes providing the forum for community housing providers to work together as a mutually supportive industry, to support their diversity, and to articulate and pursue their common aspirations.

The Federation provides advice to members, government and potential partners on the best ways to expand the industry's activities and meet the highest standards of service to tenants, applicants and communities. The organisation provides a wide range of good practice information and resourcing to support members' Boards, management and staff. The Federation is also a Registered Training Organisation and the leading provider of social housing training in Australia. Through its Centre for Training in Social Housing, the Federation delivers both accredited training, such as formal qualifications in social housing management, and tailored workshops in response to members' needs. In addition, the organisation anticipates and supports members' directions and aspirations with effective research, policy development and analysis on key issues affecting the development of the industry, and strategies to support the changing business of the industry.

This submission has been prepared in consultation with the Federation's members.

## About community housing

Community housing providers have been part of the NSW housing system for over 30 years. From small-scale, local beginnings a national industry has emerged, which is a significant component of the social and affordable housing system. Community housing providers are professionally managed and governed social enterprises with charitable tax status. They offer a diverse range of much needed services which include:

- Delivering high quality housing management services to very low, low and moderate income tenants
- Managing property portfolios for long term outcomes
- Partnering with commercial businesses, government agencies and other not for profit organisations to expand housing outcomes and improve services to tenants and communities
- Building and procuring new dwellings to increase the supply of affordable housing.

The community housing industry is growing and diversifying. Between 2006 and 2013 the number of properties under community housing management in NSW more than doubled. The industry currently manages 38,000 tenancies across very low, low and moderate income households, representing over 20 percent of all social housing in NSW. The industry currently owns almost \$1.7 billion worth of community housing properties, part of an asset base of over \$5 billion. Its rental income is over \$300 million per year.<sup>1</sup> As social enterprises with significant amounts of property under management, community housing providers make a long term investment in their communities.

As a result of properties transferred from public housing, community housing providers have built and bought almost 2,000 additional properties – this makes community housing the only part of the social housing system which is growing to meet rising demand. Providers are also diversifying their businesses by moving into new property types and serving new target groups, including disability housing. Across its 30 year history, the community housing industry has demonstrated its capacity to grow to meet new challenges.

The industry is focused on accountability and assurance to stakeholders. Community housing providers are governed by skilled Boards of Directors, with strong financial, legal, community services and property expertise. Since 2011, community housing providers have been independently regulated by the NSW Registrar of Community Housing. The NSW Regulatory Code is presently being transitioned into the new National Regulatory System, which draws heavily on the NSW regulatory approach.

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<sup>1</sup> NSW Registrar of Community Housing 2013 *Annual Statement of Performance* p. 7

In order to offer subsidised rents to low and moderate income households, community housing receives funding and other support from all three levels of government. This may include grant funding, transfer of public housing property management and/or ownership, concessions on taxes and levies, eligibility of tenants for rent assistance, and other forms of subsidy.

Community housing providers are sustainable businesses, with income sources including rent, subsidies and fees for service. Other features of the industry include:

- Capacity to leverage its asset base to attract private finance
- Development of affordable housing to deliver new dwellings for moderate income earners
- Ability to access Commonwealth Rent Assistance which averages \$3,000 per tenant per year
- Capacity to develop flexible policies to meet local needs and tenants' individual, changing circumstances
- Tax status, which includes exemptions on GST, land tax and stamp duty
- Capacity to work with developers and local government to deliver affordable housing through the planning system.



## 2. Community housing: ideal managers of social housing

The community housing industry is ideally placed to play a greater role in the management of the social housing portfolio in NSW. Managing social housing tenancies is complex work, requiring a diverse range of activities to be undertaken in an integrated manner, achieving outcomes for tenants and communities as well as organisational viability. This is core business for every community housing provider. By contrast, much of the enquiry's areas of investigations are effectively outside the scope of any existing Australian private tenancy manager.

Community housing providers are **experts at social housing tenancy management**: the industry has specialised in the effective management of social and affordable tenancies and properties for over 30 years, and currently manages 38,000 such tenancies in NSW. The industry has a strong track record in undertaking the full range of activities required for effective social housing tenancy management. Importantly for Government and tenants, the community housing industry is strongly committed to the management of social housing tenancies. This is a key element of the purpose of community housing providers: it is not a sideline business or a new line of work with which providers may experiment.

The community housing industry is **experienced in sustaining tenancies** to keep people in their homes. The ability to sustain tenancies for at risk households has been identified as a key outcome measure for social housing landlords.<sup>2</sup>

The community housing industry is **experienced in managing tenancies for people on low incomes**, paying low rents. This is in contrast with the private sector, where tenancy managers prefer tenants who pay high rent and represent low risk.

Crucially, the community housing industry is **experienced in managing tenancies where eligibility is determined by Government** policy settings which prioritise high need applicants. Again, this is in contrast with the private sector, where there are no eligibility criteria and where tenancy managers

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<sup>2</sup> Pawson, H et al 2014 *Assessing management costs and tenant outcomes in social housing: developing a framework* AHURI Positioning Paper p. 41

exercise a very high degree of control over allocation decisions. Indeed, for most private sector tenancy managers, controlling allocations in order to exclude certain would-be tenants is the key risk management strategy used to minimise costs. Managing significant cohorts of high need tenants is outside the scope of any existing private tenancy manager in Australia. The most recent Report on Government Services (ROGS) reports that over 70 percent of new community housing tenancies in NSW in 2012/13 were allocated to households with special needs. This category includes households where at least one member receives a disability support pension, is aged under 24 or over 75, or is Aboriginal.<sup>3</sup> In addition, almost 80 percent of new community housing tenancies in NSW were allocated to households in greatest need. This category includes households which are homeless, living in housing which is inappropriate or adversely affecting their health or placing their life and safety at risk, or that has very high rental housing costs.<sup>4</sup> Overall, around 90 percent of community housing tenants are low income individuals and households.<sup>5</sup>

In addition, community housing providers are **experts in managing rental subsidies**, including income-based rents and discounted market rents, and in undertaking regular income reviews in order to ensure tenants continue to comply with the rent policy as their circumstances change.

The community housing industry is **experienced in integrating property management to support effective tenancy management**. The quality of the property and the effectiveness of maintenance services are closely linked with effective tenancy management and tenant satisfaction.<sup>6</sup> This is consistent with the approach of community housing providers, which provide integrated tenancy and property management services. This approach allows community housing providers to ensure that maintenance activities are used to support tenant outcomes and sustain tenancies. It also allows community housing providers to ensure that tenancy management activities, including support for tenants, are used to help reduce the cost of repairs. For example, tenants may receive support both to take better care of the property and to reduce rent arrears in an integrated manner.

The community housing industry **demonstrates high levels of efficiency** in carrying out this complex work. The Registrar of Community Housing reports that there is no non-compliance with the requirements for registration in the crucial performance area of “efficient and competitive delivery of community housing”.<sup>7</sup> Community housing providers demonstrate:

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3 Steering Committee for the Review of Government Service Provision 2014 *Report on Government Services 2014, vol. G, Housing and homelessness* Productivity Commission p. 17.18

4 Steering Committee for the Review of Government Service Provision 2014 *Report on Government Services 2014, vol. G, Housing and homelessness* Productivity Commission p. 17.21

5 Steering Committee for the Review of Government Service Provision 2014 *Report on Government Services 2014, vol. G, Housing and homelessness* Productivity Commission p. 17A.41

6 Pawson, H et al 2014 *Assessing management costs and tenant outcomes in social housing: developing a framework* AHURI Positioning Paper p. 14

7 NSW Registrar of Community Housing 2013 *Annual Statement of Performance* pp. 44-5

- Low levels of rent arrears – the industry median is 1.2 percent, which is well within the accepted benchmark of 4 percent
- Rapid turnaround of vacancies – the industry median for reletting properties between tenants is 14 days, which meets the benchmark
- Rapid turnaround of voids – the industry median for preparing properties for reletting after major maintenance or other upgrades is 27 days, which is within the benchmark of 28 days.

At the same time as meeting or exceeding the benchmarks for efficiency, the community housing industry **demonstrates high levels of tenant satisfaction**. The Registrar of Community Housing reports an overall tenant satisfaction level of 89 percent.<sup>8</sup> This result is backed by the Federation's own independently administered tenant satisfaction survey and benchmarking service. Over the past 12 months, the Federation's surveys report an overall satisfaction rate of 85 percent, with 86 percent satisfaction with the condition of the property. In addition, the most recent National Social Housing Survey reports overall satisfaction among community housing tenants of 74 percent, compared to 65 percent for public housing tenants.<sup>9</sup>

The community housing industry is **experienced in partnering with Government** and in helping to ensure that social housing meets the Government's wider objectives. Unlike private sector tenancy managers, community housing providers are practised at responding to Government policies, and understand the role of social housing within the network of social service provision. Community housing providers work closely with the Department of Family and Community Services (FACS) to administer the common eligibility and allocation system, Housing Pathways. Community housing providers assist applicants for public housing, not just community housing, as a collaborative approach without charging a fee. The industry is already an integrated part of the social housing system.

In addition, the community housing industry is **experienced in partnering with community organisations and businesses** in order to achieve positive outcomes for tenants and communities. Other service providers, such as disability services, aged care services, and homelessness support providers, seek out community housing providers to assist their clients with their housing needs. Community housing providers partner with private sector providers, including training providers and local businesses. Community housing providers also participate freely in local and regional networks, such as housing and homelessness forums, to continue to strengthen the service system, which is outside the scope of most private tenancy managers. This sustainable stewardship approach also protects the State's property assets.

The industry is **accomplished at reporting and compliance** with the various regulatory and monitoring regimes in operation, including specific reporting on allocations, contractual reporting requirements, and

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<sup>8</sup> NSW Registrar of Community Housing 2013 *Annual Statement of Performance* p. 7

<sup>9</sup> Australian Institute of Health and Welfare 2013 *National Social Housing Survey: detailed results 2012* p. 7

reporting under the robust independent regulatory system. This has been identified in work undertaken for the NSW Government as a unique requirement of social housing tenancy management, and it is outside the scope of any existing private tenancy manager in Australia.

One of the foundation stones of public confidence in the community housing industry is the **robust, independent regulatory system** which has been in place in NSW since 2009. Providers strongly support independent regulation as part of establishing a professional industry capable of demonstrating accountability to all stakeholders: tenants, government funders, private finance partners, support agencies and the community generally. The industry believes that all social housing tenancies managers ought to be subject to the same regulatory regime, in order to demonstrate compliance with the regulatory code. This includes public housing authorities, as well as any private sector social housing tenancy managers. The new National Regulatory System, which draws heavily on the success of the NSW approach, requires community housing providers to demonstrate that they:

- Engage tenants in the planning and delivery of housing services
- Maintain an overall tenant satisfaction level of at least 75 percent
- Manage properties to optimise financial outcomes, service delivery outcomes and to meet housing needs
- Undertake comprehensive property inspections on all properties every three years
- Develop comprehensive long-term strategic asset management plans, including rolling 10 year costed plans, mapped against current and projected housing needs analyses
- Are well governed by a board which sets and implements its strategic directions and scrutinises performance via business plans, financial plans, risk management plans and business continuity plans, operating in line with the Corporate Governance Principles set out by the Australian Stock Exchange
- Are financially viable at all times.<sup>10</sup>

The community housing industry is **trained and resourced in the specific tasks required to undertake social housing tenancy and property management**. The industry undertakes specialist qualifications in social housing – the Diploma and Certificate IV in Social Housing – which recognise the unique and complex nature of the work. The Federation is an industry-based Registered Training Organisation (RTO), which has delivered formal accredited training to community housing providers since 2000. In the past two years alone, the Federation has delivered over 150 units of accredited training to over 600 community housing staff members in NSW.

The community housing industry **uniquely brings social entrepreneurship to the task of social housing tenancy management**. The value of the “third sector” is that it combines the strengths of both

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<sup>10</sup> National Regulatory System for Community Housing Directorate *Evidence Guidelines*; National Regulatory System for Community Housing Directorate *Registration Return Guide*

the public and the private sector. Community housing providers are independent of government, but they understand government's needs and priorities, and are experienced in implementing government objectives and exercising stewardship over public assets. Community housing providers are not businesses, but they are business-like, with a commercial approach to decisions and a strong focus on viability while at the same time having an awareness of the social impact of their decisions.

The community housing industry **already operates at scale, and is capable of further significant growth**. Among the Federation's members, which between them manage over 95 percent of community housing in NSW, most providers manage over 750 properties, with the largest managing over 4,000. In NSW alone, the community housing industry manages 38,000 tenancies, and is represented in large and small communities across the State. As a substantial piece of social and economic infrastructure, the community housing industry stands ready to grow further to respond to government and community needs.

Finally, **all profits are reinvested into additional social and affordable housing**. Through a combination of efficient tenancy and property management, prudent leverage, partnering to bring in additional resources, and other business activities, community housing providers continue to grow the social housing system. By contrast, private sector involvement in social housing tenancy management would see any profits leaving the social housing system, which would further diminish the long term viability of the system.

### 3. The full range of activities required for effective social housing tenancy management

**Effective tenancy management in social housing involves a wide range of activities. All of these activities need to be understood and costed. Further, the value of integrating the activities needs to be understood and costed, to maximise the effectiveness of social housing.**

#### The social housing tenant cohort

The increasingly limited provision of social housing within NSW has become targeted towards tenants with high needs. Compared to the general population, social housing tenants are more likely to face some form of disadvantage such as unemployment, physical or mental disability. This level of disadvantage means that some community housing tenants have high support needs. This can also include the need for multiple support services to help with different specialised issues. For example, in 2012, 48 percent of community housing households in NSW had used health/medical services in the past year, while 23 percent had used mental health services.<sup>11</sup> This profile also means that these tenants are more likely to need a home designed to enable them to live independently.

The Auditor General's 2013 report into public housing "Making the best use of public housing" acknowledged the rapidly increasing proportion of tenants with high need – such as tenants with significant disabilities and vulnerable or frail elderly tenants – and noted that this trend is expected to continue.<sup>12</sup>

The most recent Report on Government Services (ROGS) reports that over 70 percent of new community housing tenancies in NSW in 2012/13 were allocated to households with special needs. This category includes households where at least one member receives a disability support pension, is aged under 24 or over 75, or is Aboriginal.<sup>13</sup> In addition, almost 80 percent of new community housing tenancies in NSW were allocated to households in greatest need. This category includes households

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11 Australian Institute of Health and Welfare 2013 *National Social Housing Survey: detailed results 2012* p. 66

12 Audit Office of NSW 2013 *Making the best use of public housing* pp. 12 & 44

13 Steering Committee for the Review of Government Service Provision 2014 *Report on Government Services 2014, vol. G, Housing and homelessness* Productivity Commission p. 17.18

which are homeless, living in housing which is inappropriate or adversely affecting their health or placing their life and safety at risk, or that has very high rental housing costs.<sup>14</sup>

While not every social housing tenant is high need, managing the tenancies of significant proportions of tenants with high or complex needs is now the defining characteristic of the social housing tenancy management task. This is the context for all attempts to assess the most cost effective way to provide tenancy management and support services to social housing tenants. Increased targeting of social housing to high need tenants is a key driver of the structural deficit facing public housing not only in NSW but across Australia. For over a decade, researchers and public policy practitioners have identified a looming structural deficit due to long term under-investment in maintenance and asset management, little or no funding for new supply, and increased targeting to high need tenants. This combination leads to an increase in the cost of tenancy management, a decrease in the value of the asset, and a decrease in the rental income stream.<sup>15</sup>

In order to manage social housing tenancies effectively and achieve outcomes for tenants and communities, social housing landlords may undertake one or more of a wide range of activities which go well beyond the basic tenancy management role of signing leases, managing rent collection processes and coordinating responsive maintenance. This work may include:

- Activities to sustain tenancies
- Intensive tenancy management for vulnerable or high need tenants
- Connecting tenants to support services
- Connecting tenants to opportunities such as employment, education or training
- Place management for successful communities.

Community housing providers are expert in giving tenants access to the supports and services required to take advantage of opportunities such as employment and education, and to engage more fully with the community. In the most recent National Social Housing Survey, the vast majority of NSW community housing tenants reported that they felt more settled and were better able to manage their finances.<sup>16</sup> Importantly, another study linked security of tenure with improved employment outcomes.<sup>17</sup>

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14 Steering Committee for the Review of Government Service Provision 2014 *Report on Government Services 2014, vol. G, Housing and homelessness* Productivity Commission p. 17.21

15 See for example Hall, J. & Berry, M. 2004 *Operating deficits and public housing: policy options for reversing the trend* AHURI Final Report No.55; Hall, J. & Berry, M. 2007 *Public housing: shifting client profiles and public housing revenues* AHURI Final Report No.108

16 Australian Institute of Health and Welfare 2013 *National Social Housing Survey: detailed results 2012* p. 57

17 Beer A & Faulkner D 2009 *21st century housing careers and Australia's housing future* AHURI Final report no. 128

## Sustaining tenancies

Most community housing providers broker support for tenants via formal partnerships, focusing on services for tenants with disabilities, support for tenants with mental health or drug and alcohol issues, or services for older tenants. Most also broker support for tenants via a range of informal arrangements. In addition, around half of all community housing providers offer assistance to tenants to seek employment, education or training via partnerships with schools, TAFEs and other providers. Over half of all community housing providers also work with local service providers, such as neighbourhood centres and local government, to help their tenants engage more actively in their communities, or provide community engagement services directly to their tenants.

Community housing providers, as part of the social housing system, take a great deal of trouble to sustain tenancies and avoid evictions, in acknowledgement that most evictions will lead to homelessness. This stands in stark contrast to the practices of the private market, where eviction is a business decision triggered by the behaviour of the tenant or the preferences of the landlord, without regard for the tenant's capacity to find alternative accommodation. In fact, where vulnerable tenants are evicted from a private rental property, the tenancy manager might legitimately expect that they would be housed in social housing or crisis accommodation. Social housing tenancy managers cannot find comfort from the idea of a tenure of last resort: they manage that tenure. In addition, the NSW Civil and Administrative Tribunal (NCAT) expects social housing tenancy managers to behave differently from their private sector counterparts: to collect more evidence, to show more attempts to sustain a tenancy, and to demonstrate that there is no alternative to eviction. It is also worth noting that the social housing cohort consists not entirely but significantly of people who are unable to live in the private rental market. This is not just caused by the cost of housing, but because the private market response is inadequate for them as they require a higher level of support, and a different approach to tenancy management, in order to achieve stability.

Integrating services is challenging. To be successful at this requires time, financial resources, shared goals and leadership to overcome organisational, sectoral and program "silos".<sup>18</sup> Community housing providers make the commitment to facilitate integrated services because they understand that it can be an effective way of enabling tenants to maintain their tenancy. Where there are silos in Government, for example, within the Department of Family and Community Services (FACS), between FACS and Education or Health, community housing providers can be the hub which links these services for tenants.

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<sup>18</sup> Australian Housing and Urban Research Institute 2009 *AHURI Research and Policy Bulletin Issue 112: Enhancing the effectiveness of Australian social housing integration initiatives*



## Responding to local needs through in-house expertise and external partnerships

It has long been recognised that a key strength of community housing is the industry's ability to respond to local needs, bring in other community resources and provide or facilitate a wide range of services to assist tenants. The reason the industry is able to perform this role is because community housing aims to blend a social mission with financial viability and sustainability. In addition it has strong long established community links. This means that the industry is recognised as having a long term commitment to the communities in which it works.

Community housing is also able to use this local presence and connections to link tenants with their neighbours and communities. In doing so this encourages the voluntary connections which are the heart of community engagement. To facilitate and enhance these offerings, some community housing providers are now employing community development workers. Community housing providers have the flexibility and local knowledge to deliver or broker a wide range of services to tenants, including:

- Support partnerships to ensure sustainable tenancies
- Access to training and education
- Access to employment opportunities
- Linking tenants with their neighbours and communities.

Services delivered through this approach include family and tenancy support which can be highly effective at sustaining tenancies. This helps to break the cycle of disadvantage where vulnerable people revolve in and out of homelessness, leading to very high individual and social costs. To ensure that tenants with special or complex needs are able to sustain their tenancies it is very common for community housing providers to have specialist teams or people within their organisation to coordinate the high level of support required from different agencies. Other instances of services delivered through a range of partnerships include education, skills and employment programs, environmental sustainability projects, access to childcare and in-home health assistance and financial inclusion initiatives. Many of the users of these services are from disadvantaged groups such as the elderly, people with a physical or intellectual disability and Aboriginal people. Community housing providers are even creating new forms of service delivery through the establishment of social enterprises where tenants are delivering services themselves.

The following examples illustrate the scope of services offered through community housing providers:

- **Physical disability:** North Coast Community Housing in partnership with Lifebridge East and Ko;ho designed and developed a four-unit house which has enabled four people with a disability,

who would otherwise still be living with their ageing parent carers, to live independently in the community of Murwillumbah.

- **Intellectual disability:** Homes North working in partnership with Richmond PRA were selected through an open tender process to deliver new intensive support and accommodation packages which will provide an opportunity for clients with an intellectual disability to exit institutional care and integrate into the community. The funding includes a capital grant to upgrade and redevelop an existing site managed by Homes North in Tamworth.
- **Homelessness:** Platform 70 in Woolloomooloo (operated by Bridge Housing) and Project 40 in Western Sydney (operated by Wentworth Community Housing) provide housing with support to homeless people based on the “housing first” model. In these projects, the community housing provider brokers accommodation from the private rental market, delivers tenancy management services directly, and partners with specialist support agencies which deliver support. Bridge Housing works with a range of partners including Neami Way2Home and Aboriginal Assertive Outreach Service which provide the wrap around support from street to home. In the case of Wentworth Community Housing there are more than 80 active partners, operating across three large local government areas (Blacktown, Nepean and Blue Mountains). Mission Australia Housing also operates Common Ground, another model where housing and a range of support are co-located.
- **Clinical support for tenants with high complex needs:** Pacific Link Housing has established a team of qualified social workers to ensure that internal staff and external partners provide quality support services to tenants with high complex needs. The Clinical Support Co-ordinators strengthen partnerships with external support providers and monitor and improve standards of service delivery. The team also mentors Pacific Link’s housing staff, to support their work with tenants with high complex needs, motivating them to ensure quality services, and provide regular training and briefing sessions on support agency services. The establishment of this team is designed to ensure that Pacific Link tenants have the best possible support to maintain their tenancies, with a particular focus on mental health, hoarding and squalor and assisting tenants with disabilities.
- **Refuge service:** Housing Plus operates a refuge for women and their children experiencing domestic violence in Orange. The refuge is an innovative crisis accommodation model, designed in consultation with domestic violence network members, health and community service providers and local government and government departments.
- **Policing:** Community housing providers use Record of Understanding to enable them to work in partnership with the police to tackle crime and anti-social behaviour.
- **Crisis accommodation:** Community housing providers also manage housing specifically designed to provide a pathway for homeless people from crisis to long term independent living. Community housing providers operate in partnership with specialist homelessness services, for example, by housing clients nominated by the homelessness service which provides transitional support. In addition, community housing providers can also provide crisis accommodation through their own rapid rehousing models. One example of this is Hume Housing’s Temporary

Accommodation program (TAP). This model provides cost effective, fully furnished accommodation for homeless singles, couples and families, reducing Housing NSW's use of motels for crisis accommodation. Hume conducted a review of the program which demonstrated that in 2011/12 it saved Housing NSW over \$600,000 in crisis accommodation costs. This was in addition to providing a far more appropriate setting to assess and address customers capacity to obtain a sustainable tenancy.

- **Community volunteers:** Southern Cross Community Housing is the lead agency in "Yard Assist". The aim of the group is to provide volunteer based services for people in need of support around the house and garden.
- **Youth services:** Argyle Community Housing is part of the WIN (Wagga Impact Network) Child Family Youth Alliance, which reinforces services from non-government organisations within the Wagga community. The Alliance comprises 11 leading agencies that work to address service coordination, funding and role distribution.
- **Practical support for tenants:** Homes North Community Housing is establishing a program to to supervise volunteers on a local housing estate. The volunteers will assist high needs tenants with jobs around the house such as cleaning or repair of minor damage. The aim is to create community connections for isolated tenants living in a fractured community, to improve their living conditions, and assist them to learn independent living skills. The program will also help to reduce the cost of repairs, and reduce the burden of debt for high needs tenants.
- **Education:** SGCH, a major community housing provider across metropolitan Sydney, provides a number of tenants with a financial bursary that they can put towards the cost of educating themselves or their families. Some bursary recipients use the grant to pay for textbooks while others buy computing software or pay tuition fees. Since the scheme started in 2005, 617 bursaries and scholarships have been awarded, worth nearly \$520,000. One recipient, Hassan, is studying Aviation Management at the University of NSW. In his words: "Without the bursary and encouragement from SGCH most people would not be encouraged to pursue their education, I am grateful to be a recipient of the scheme as it has helped me get closer to my goals in life."
- **Crime Prevention:** Compass Housing Services has worked with local council and police to improve the environment in and around the South Muswellbrook estate, in a joint initiative known as "Operation Stormbreaker". The focus is on identifying anti-social behaviour and nuisance issues and putting in place initiatives aimed at improving the ambiance of the estate. To date, these have included implementing a clean-up using skip bins and street sweeping of the South Estate, cutting back bushes and trees in council owned parks, identifying unregistered dogs and increasing ranger patrols.
- **Supporting employment:** Pacific Link Housing offers a suite of tenant programs, developed with feedback from the Tenant Reference Committee and annual tenant survey, which are designed to build skills to assist tenants towards employment. These include support for learner drivers – to assist young people to access employment in a region with limited public transport. Pacific Link's tenant programs also include: education scholarships to enable tenants and their families with school, university, TAFE or other training; a laptop purchase scheme; and a tenant employment

scheme, operated in partnership with a local social enterprise, to help tenants overcome barriers to employment.

- **Supporting employment:** Hume Housing has created a learning space for social and affordable housing tenants in Telopea, consisting of computers, laptops and fit out of the room so it can be used for training. This allows tenants to develop essential digital literacy skills, which is a step towards engagement in employment and education, and accessing local resources. Hume has partnered with the local TAFE Outreach to deliver a weekly program, and also engages with community organisations such as Fitted for Work, to support tenants to work on self esteem and presentation for work readiness. Holding these sessions on site reduces the cost of transport and removes access barriers for tenants.

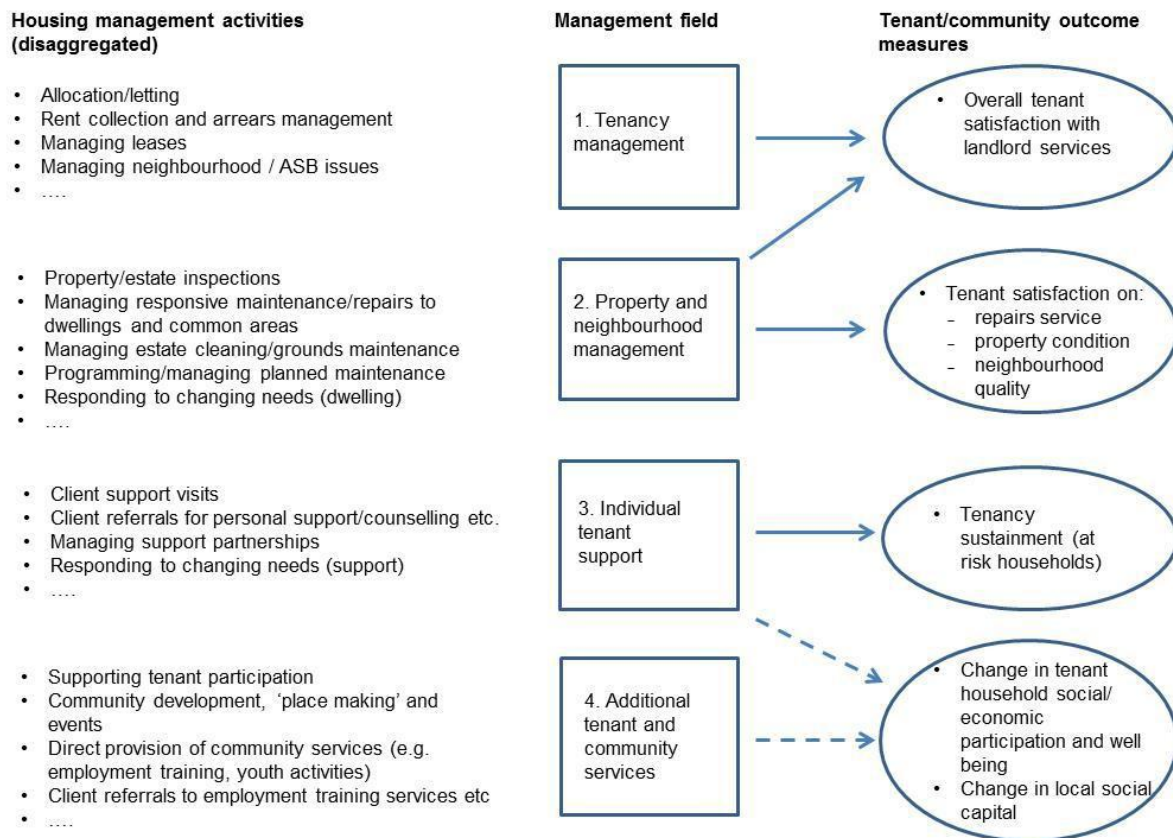
## Current approaches to understanding the range of activities

In order to understand and cost these diverse activities, the AHURI research project investigating management costs and tenant outcomes in social housing proposes a typology consisting of four “management fields”:

- Tenancy management
- Property and neighbourhood management
- Individual tenant support
- Additional tenant and community services.

See Figure 1.

**Figure 1: Conceptual framework for measuring social housing cost of provision and tenant outcomes<sup>19</sup>**



An alternative typology is used by KPMG in its work for the Department of Family and Community Services (FACS). The KPMG approach is to separate tenancy management activities into three groups:

- Activities which are the same in commercial and public housing tenancy management
- Activities which are common to commercial and public sectors, but are carried out in a different way in government because of fairness and transparency obligations
- Activities which are not undertaken in the commercial sector, but are undertaken in public housing as a community service because of the needs of tenants.

<sup>19</sup> Pawson, H et al 2014 *Assessing management costs and tenant outcomes in social housing: developing a framework* AHURI Positioning Paper p. 41

This approach is clearly designed to facilitate cost comparisons with the private rental market by separating out the additional work required either because of government and community expectations of social housing, or because of the tenant cohort. The benefit of this approach is to highlight the work required for management of social housing tenancies which goes beyond “core” tenancy management in, for example, the private rental market. This helps identify and cost the additional activities required of a social housing manager. For example, the second category draws out the reporting requirements and compliance with policy which is a feature of social housing tenancy management. Activities in this category include:

- Significant reporting requirements to government
- Substantial joint work between public and community housing providers on the shared waiting list, Housing Pathways
- Significant requirements regarding effective complaints and appeals mechanisms.

These activities are part of the normal course of business for community housing providers. The community housing industry is accomplished at complying with a range of reporting requirements to the NSW Government, the Commonwealth Government, the Registrar of Community Housing, the Australian Securities & Investment Commission and other agencies. By contrast, the private sector has been shown to struggle with basic reporting under the National Rental Affordability Scheme (NRAS): reporting under NRAS is light compared to the requirement to undertake income assessments for social housing tenants every six months in order to adjust income-based rents. Some community housing providers have established separate teams to manage income assessments, in acknowledgement that it is a separate piece of work on top of regular tenancy management activities.

The drawback of the KPMG approach is that it may obscure the extent to which these three types of activities are most effective when undertaken in an integrated manner. If the tenancy manager does not undertake these activities directly, or coordinate other organisations to undertake the activities in an integrated manner, the outcome is two-fold: the tenant receives a less effective service; and the cost of filling the gap will fall on other government agencies.

For example, if the social housing tenancy manager does not undertake the activities required to sustain vulnerable tenants in their housing, these tenants are likely to fall into homelessness. The cost of providing temporary or crisis accommodation to people who are homeless will be borne by FACS, through the homelessness budget. This will put pressure on existing specialist homelessness services, which already face greater demand than they can manage. In the medium to long term, the same individuals are likely to become social housing tenants again, the only difference being that their lives will have been further destabilised and their opportunity of overcoming disadvantage further diminished. It is worth noting that the recent reforms to the homelessness service system – known as Going Home Staying Home – deliberately shifted the focus of the service system to preventing homelessness by supporting people at risk of homelessness to maintain their housing. This is in explicit acknowledgement that it is more expensive to try to support someone who is already homeless than it is to support

someone to avoid homelessness. It would be an unfortunate irony if changes to the social housing system meant that existing social housing tenants were more likely to become homeless.

To take another example, if the social housing tenancy manager does not undertake the activities required to manage neighbourhoods with high concentrations of social housing – such as public housing estates – this will lead to increased costs for other parts of FACS, and other government agencies such as education, police, health and correctional services.

The full suite of activities required to manage social housing tenancies effectively is community housing's core business but almost entirely outside the scope of any existing private tenancy manager in Australia.

Recent work undertaken for the Victorian Government by KPMG to explore options for increasing the supply of social housing includes analysis of the effectiveness of outsourcing tenancy management to private or community sector organisations.<sup>20</sup> This project reviewed, amongst others, the option of transferring properties to community housing and the option of transferring a range of tenancy management functions to either private or community sector organisations. While neither of these models rated especially well from the point of view of increasing the supply of social housing, transferring properties to community housing rated better than simple outsourcing of tenancy management on the key issues of: leverage opportunities (which support additional supply), operational efficiencies, transfer of risk from Government, customer satisfaction and access to favourable tax settings.<sup>21</sup> The report concludes that a range of strategies undertaken in conjunction, and mindful of the policy priorities of the Government, is likely to be most effective. Importantly, the report recommends further exploration of the option of transferring properties to community housing, but does not recommend transfer of tenancy management functions alone.<sup>22</sup>

## Recommendation 1

**The NSW Government to work with the community housing industry to establish benchmarks to measure the effectiveness of social housing tenancy management which identify the full range of outcomes sought and which do not prioritise cost over other outcomes.**

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20 KPMG 2012 *Social Housing: A discussion paper on the options to improve the supply of quality housing*

21 KPMG 2012 *Social Housing: A discussion paper on the options to improve the supply of quality housing* p. 4

22 KPMG 2012 *Social Housing: A discussion paper on the options to improve the supply of quality housing* p. 85

## 4. The complexity of costing social housing tenancy management

**The development of accurate, meaningful costings for tenancy management in social housing is vital, however this is not a straightforward task. The experts agree that no such measures currently exist. More importantly, no measures currently exist to assess service performance or tenant outcomes.**

Australia's premier housing research body, the Australian Housing and Urban Research Institute (AHURI), is currently conducting a project on this topic, led by some of the most respected housing academics in Australia. The AHURI positioning paper starts with the acknowledgement that "basic 'cost of provision' metrics... do not currently exist"<sup>23</sup> and that the most commonly used efficiency measure for social housing "is of little value".<sup>24</sup> This is because the measure incorporates the cost of a wide range of activities which are not uniformly undertaken by providers, and cannot be disaggregated to provide a more meaningful cost comparison. The measure to which the paper refers – the net recurrent cost per dwelling – is used in the Report on Government Services (ROGS) and widely cited by other researchers for lack of an alternative.

Even at the level of the most basic data regarding overall expenditure and dwelling numbers, the ROGS notes: "Data may not be comparable across jurisdictions or service areas and comparisons could be misleading."<sup>25</sup> Specifically in relation to the net recurrent cost per dwelling, the ROGS acknowledges that the data does not allow for accurate comparisons between public housing or community housing or various forms of Aboriginal housing.<sup>26</sup>

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23 Pawson, H et al 2014 *Assessing management costs and tenant outcomes in social housing: developing a framework* AHURI Positioning Paper p. 1

24 Pawson, H et al 2014 *Assessing management costs and tenant outcomes in social housing: developing a framework* AHURI Positioning Paper p. 2

25 Steering Committee for the Review of Government Service Provision 2014 *Report on Government Services 2014, vol. G, Housing and homelessness* Productivity Commission; see also Australian Institute of Health and Welfare 2013 *Housing assistance in Australia 2013* and the *Community housing data collection 2011-12 Data Quality Statement* <http://meteor.aihw.gov.au/content/index.phtml/itemId/526136>

26 Steering Committee for the Review of Government Service Provision 2014 *Report on Government Services 2014, vol. G, Housing and homelessness* Productivity Commission p. 17.26



Similarly, the National Social Housing Survey published by the Australian Institute of Health and Welfare, includes significant disclaimers about the reliability of the data.<sup>27</sup> The survey is a valuable source of information on the satisfaction levels of social housing tenants, which is widely used despite reservations regarding reliability. Its value would be enhanced if the data were considered reliable and if the satisfaction results could be linked to other metrics such as management costs.

Other potential basic measures of cost effectiveness, such as a staff to property ratio or staff costs to property ratio, suffer from the same lack of comparability: the range of activities undertaken by staff varies between providers; the costs attributed to “tenancy management” are applied inconsistently; and the diverse internal structures of providers tend to exacerbate the issue. For example, larger community housing providers may operate from one or several offices; they may have specialist supported housing teams or may integrate all tenancy management and tenancy support functions; they may separate tenancy and property management within their structure, or designate teams to be responsible for tenants and properties in a portfolio approach. The characteristics of each provider’s tenant group also has an impact on these basic measures. For example, a provider with a high proportion of transitional accommodation or which operates a boarding housing house will have higher tenancy management costs. In addition, wages and other conditions vary considerably from provider to provider, and across provider-types, and charitable organisations are able to offer other benefits through taxation concessions such as the Fringe Benefits Tax.

As the AHURI researchers make plain, the complexity of costing social housing tenancy management makes it difficult even to develop accurate comparisons at the level of expenditure; the task is even more difficult when attempting to measure service performance or outcomes.<sup>28</sup> It is the latter which is most relevant for determining whether a higher cost approach to tenancy management, or to specific tenancy management tasks, represents value for the additional benefits delivered.

A key part of the complexity of costing social housing tenancy management is the broad range of activities which are potentially included, as well as the other factors which may impact on the cost of one or more activities. For example, tenancy management may include activities designed to support vulnerable tenants, manage high concentrations of social housing, provide opportunities for tenants to access other services or engage with their communities, and manage the impact of poor quality housing on tenants, alongside the more traditional tenancy management tasks of signing leases and administering rent collection processes. Indeed, the Housing Act requires a number of activities to be undertaken by social housing tenancy managers: not only to ensure that people in highest need are

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27 Australian Institute of Health and Welfare 2013 *National Social Housing Survey: detailed results 2012* pp. 5-6

28 Pawson, H et al 2014 *Assessing management costs and tenant outcomes in social housing: developing a framework* AHURI Positioning Paper p. 6

housed,<sup>29</sup> but also to promote social inclusion<sup>30</sup> and tenant participation,<sup>31</sup> and attract funding into the system to support linking tenants to employment and services.<sup>32</sup>

These tasks are undertaken to a different degree and in different ways by social housing tenancy managers, depending on their location, the characteristics of their tenant group and neighbourhoods, their size, their partnerships and other organisational factors. The range of activities required for effective management of social housing tenancies is discussed more fully in the following section: what is important here is to understand that the cost effectiveness of social housing tenancy management cannot be simply assessed by reference to an existing metric or performance indicator.

The Federation is aware that business units of the Department of Family and Community Services (FACS) have undertaken work designed to facilitate cost comparisons, and to categorise activities to better understand the business of social housing tenancy management. It is hoped that the Public Accounts Committee inquiry can lead to a public discussion of these pieces of work.

A basic flaw in most attempts to compare the cost of public housing versus community housing is to assume that a single, average cost can legitimately be produced for either sector. It is clear that community housing providers' tenancy management costs vary: providers operate at different scales, in different locations and according to a diverse range of business models. Equally, it does not cost the same to deliver public housing tenancy management in Bankstown, Bourke and Byron Bay.

## Recommendation 2

**The NSW Government to finalise and publish work on the range of activities required to undertake effective social housing management, and to work with the community housing industry to develop meaningful costings and performance indicators.**

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29 NSW Housing Act 2001 s. 5(1)(f)  
30 NSW Housing Act 2001 s. 5(1)(i)  
31 NSW Housing Act 2001 s. 5(1)(e)  
32 NSW Housing Act 2001 s. 5(1)(q)

## 5. The outcomes sought by government

**Tenants and Government seek outcomes beyond the core tenancy management tasks of signing leases, collecting rent and coordinating maintenance requests. The outcomes sought reflect the breadth of the activities undertaken by the community housing industry in order to stabilise tenants' lives and support the communities in which they live.**

### Outcomes for tenants

Community housing is well placed to deliver outcomes for tenants and outcomes for Government. As articulated above, tenants need a wide range of support and other services in order to maintain their tenancies. Community housing providers currently:

- Undertake activities to sustain tenancies
- Provide intensive tenancy management for vulnerable or high need tenants
- Connect tenants to support services
- Connect tenants to opportunities such as employment, education or training
- Carry out place management activities, to ensure successful communities.

Tenants also value continuity, and being able to establish a trusting, respectful relationship with an organisation which can coordinate other supports and services, so that tenants do not have to access all services separately or tell their story to multiple service providers.

### Outcomes for Government

Beyond outcomes for individual tenants, the Government seeks to deliver its public policy objectives, including:

- Facilitating tenants to stabilise their lives so they can take up opportunities and overcome disadvantage, for example, by engaging in employment, education or training
- Linking the provision of appropriate housing to vulnerable people receiving other Government services, for example, through non-housing activities of the Department of Family and Community Services (FACS)

- Reducing the demand on homelessness services by assisting people at risk of homelessness to maintain their housing
- Achieving cost effectiveness at a whole-of-government level by ensuring that savings achieved in social housing tenancy management do not have the effect of increasing costs elsewhere in FACS or to other government agencies
- Achieving cost effectiveness at a whole-of-community level by ensuring that savings achieved in social housing tenancy management do not have the effect of increasing costs elsewhere to the community for example in increased unemployment or social disruption.

A necessary first step for government is to determine its public policy objectives for the social housing system. It is worth noting that the Audit Office, in its 2013 report on public housing, specifically required FACS to complete its social housing policy in order to give direction for the future of the social housing system.<sup>33</sup> FACS has not yet done so. Without this policy direction, FACS cannot easily identify how best to achieve its objectives, and therefore the scope of the work required for social housing tenancy management, and therefore an appropriate cost for that work.

## Unlocking the potential of community housing

One important objective for government is to ensure that the social housing system is sufficient to respond to housing need. Growing community housing can generate new supply of social and affordable housing – this is not available through private sector involvement in social housing management.

A key element in the growth of social and affordable housing is the transfer of properties from public to community housing. Far from simply moving properties from one part of the system to another, this transfer helps to grow the system by creating opportunities for leveraging private finance, and assisting community housing providers to achieve further economies of scale. A recent report to the South Australian Government indicates that an estimated \$20.8 million annually would be added to social housing in that state if 10,000 properties were transferred from public to community housing.<sup>34</sup>

In addition, property transfer programs which incorporate redevelopment can lead to better use of land and a better urban environment, with increased densities and upgraded properties. The resulting portfolio can be designed to match the current and projected needs of tenants, rather than out-dated tenant profiles, which assists with managing under-occupancy.

Other jurisdictions, such as Queensland, Tasmania and South Australia have already embraced such transfers as a very viable tool for neighbourhood regeneration and new dwelling development. These

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<sup>33</sup> Audit Office of NSW 2013 *Making the best use of public housing* p. 5

<sup>34</sup> *Optimising Investment in South Australia's Housing System* 2014

programs meet, or in some cases exceed, the 2009 Housing Ministers' commitment to transfer up to 35 percent of public housing to community housing in each jurisdiction.<sup>35</sup> While the NSW Government is a signatory to the agreement, it has not re-stated its commitment nor has it identified a program or process for commencing transfers.

This is despite the fact that previous property transfers in NSW have begun to bear fruit to a very significant extent. As the sector stands on the cusp of taking a leading role in the delivery of improved maintenance, private finance leverage and delivery of social dividend overall, it is crucial that the NSW Government continues to support this direction and collaborate with industry in developing a new program of property transfers.

In order to facilitate the establishment of a large scale tenanted property transfer program, the Federation has conducted industry-based research to identify the key elements for effective implementation of transfers.<sup>36</sup> Amongst these elements were:

- The need for government and industry to work together to achieve an effective transfer program
- The need for engagement with tenants, including identifying opportunities for tenants to influence the transfer program and effective communication with tenants.

While it is not necessary to transfer title in order to achieve some of the outcomes sought in transfer programs, the Federation's research identifies that the ability of community housing providers to exercise control over the asset is one of the key elements in successful programs. For example, where a transfer program is intended to deliver significant community renewal outcomes, the provider will require sufficient control of the asset to make long term decisions about the portfolio including redevelopment, sales and procurement, in order to ensure that the asset meets the needs of the community.

Increasing affordable housing supply is one of the main aims of property transfers as additional resources may be attracted into the social housing system via community housing tenants' eligibility for Commonwealth Rent Assistance (CRA), cost savings flowing from lower administrative costs and tax benefits, and by leveraging transferred properties to build or purchase additional properties with private finance.

Transferring properties with title significantly enhances the leverage capacity of community housing providers by providing additional capital against which private finance can be borrowed. Recent reports

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35 The Housing Ministers Conference 2009 *A Progress report to the Council of Australian Governments from Commonwealth, State and Territory Housing Ministers - Implementation of the National Housing Reforms*

36 NSW Federation of Housing Associations 2014 *Tenanted Property Transfers: Towards a community housing industry preferred approach to managing future property transfers in NSW*

indicate varying levels of leverage capacity, and assume varying degrees of reliance on title.<sup>37</sup> Leverage capacity will always be driven by the specific terms of the deal, including: the size and value of the portfolio to be transferred, the size and value of the provider's existing portfolio, the maintenance liabilities of the portfolio to be transferred and any funding commitment to address this, and the provider's existing borrowing commitments. It is important to note that the absence of title diminishes the provider's borrowing power: industry experience is that lenders focus on both income stream (rent plus CRA) and security (property title) when assessing proposals. In fact, many lenders seek security by way of charges over the organisation's assets beyond those involved in a transfer project. This highlights the importance of title in maximising access to private finance.

Community housing providers seek to optimise the use of the social housing portfolio under their management. This is intended to deliver social outcomes for a changing tenant profiles, as, for example, existing tenants age in place or new tenants are housed with specific needs. It is also intended to deliver the best financial outcomes for the provider and for the social housing system as a whole.

To achieve this, community housing providers need to be able to make effective and timely decisions about assets, including redevelopment and disposals as well as upgrades and more investment in planned maintenance. In the absence of clear government policy, many community housing providers find it difficult to engage with government regarding these kinds of portfolio decisions. Community housing providers seek a greater degree of control over the asset, or a clear pathway for negotiating with government. For example, government may retain decision-making power in relation to property disposals, under a formalised policy that government would not withhold approval unless it could demonstrate that a better outcome could be achieved in a different way.

For the management of social housing tenancies to be most effective, tenancy and property management need to be integrated, rather than split. The Federation's research indicates that this is even more effective when property management includes sufficient control of the asset to use the portfolio to support tenant outcomes and overall viability.

## Recommendation 3

**The NSW Government to release the Social Housing Policy for consultation, and ensure that it leads to an explicit statement regarding the growth and further diversification of community housing into the future.**

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<sup>37</sup> Shelter NSW 2010 *Leveraging affordable rental housing for sustainability and growth*, Sphere Analysis, Shelter Brief 145; see also KPMG 2012 *Social Housing: A discussion paper on the options to improve the supply of quality housing*

## Recommendation 4

**The NSW Government and community housing industry to work in partnership to establish a large scale tenanted property transfer program, which exceeds the Housing Ministers' benchmark of 35 percent, to support the effective management of social housing tenancies and properties.**

## Recommendation 5

**The NSW Government and community housing industry to work in partnership to establish a new approach to the transfer of title to community housing, in order to support the expansion of the social and affordable housing system.**

## Recommendation 6

**The NSW Government to require all non-government managers of social housing tenancies or properties to achieve registration under the National Regulatory System for Community Housing, in order to ensure to give assurance to tenants, Government and the public.**

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