



**INQUIRY INTO THE ALLOCATION OF SOCIAL  
HOUSING**

**YAA SUBMISSION**

**Public Bodies Review Committee  
Legislative Assembly  
Parliament of New South Wales**

**MARCH 2006**

**[www.yaa.com.au](http://www.yaa.com.au)**



## **About YAA**

The Youth Accommodation Association (YAA) is the peak youth homelessness body in NSW. As an association of organisations YAA has direct communication, consultation and representation from agencies that provide services to young people who are homeless or at risk of homelessness. Throughout its history, YAA has also established strong working relationships with relevant Government and Non-government organisations, greatly assisting in meeting our key objectives.

YAA seeks to advocate for homeless young people, provide relevant and current information on youth homeless issues, conduct and promote relevant field based research on youth homelessness and related issues, and represents the views and needs of young people at risk of homelessness, and their service providers, through effective consultation and representation.

On a national level, YAA is a member of the National Coalition for Housing (NYCH) and is represented on the Australian Federation of Homeless Organisations (AFHO).

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## **Introduction**

YAA values the opportunity to respond to the inquiry into the allocation of social housing on behalf of youth accommodation services. YAA recognises that this inquiry has far-reaching implications not just for the youth sector but also for the community sector as a whole.

Given our area of expertise we have responded to two of the four issues areas these being:

- **The effectiveness and appropriateness of housing allocations**
- **Role of community housing in meeting the demand for social housing**

The main ongoing issue for the youth accommodation sector in relation to the inquiry into the allocation of social housing relates primarily to the eligibility criteria for both public and community housing, which will effect the allocations of social housing. This submission will seek to address the current inconsistencies in the eligibility criteria. YAA has identified an inconsistency in eligibility criteria between the general population applying of housing assistance and young people under 18 being issued with stricter eligibility criteria. This inconsistency will be outlined in greater detail within this submission.

YAA, on behalf of the youth accommodation sector, requests that the inquiry into the allocation of social housing seek to address the inconsistencies in the eligibility criteria related to young people, particularly those under 18 who are often overlooked within the allocation process.

## **The effectiveness and appropriateness of housing allocations**

Allocations systems are an integral element to the social housing system providing determination of eligibility, matching of households with specific properties and the ordering of assistance provision. Firstly, YAA would like to formally commend the Department of Housing on its policies for providing opportunities for under 20's, to access housing in NSW. In line with this inquiry is the Reshaping Public Housing reforms announced by the Premier and the Minister for Housing in April 2005. As these reforms seek to create new opportunities for those most in need to be assisted more effectively, YAA recommends that the allocations inquiry will be used to build upon these reforms particularly those reforms related to youth policies and housing allocations.

It is the concern of YAA that the Department of Housing Policy EST0017: Minors and Housing Assistance raises language interpretation issues which could adversely effect the effectiveness and appropriateness of housing allocations in NSW in relation to young people.

The documents states:

*The Department of Housing may provide housing to people under 18 years of age, who are not being cared for by an adult (minors) if:*

- *Public housing is the best way to meet their accommodation needs, and*
- *We are satisfied they are able to meet the obligations of tenancy*

The issue with this statement is in the language and interpretation of the word “may”. YAA is concerned that this form of non-committal language raises issues for the practice of the policy at a local office level, as statements such as these are open for interpretation by the local Department of Housing staff. As a solution to these interpretation issues YAA recommends that the use of the word “may” in the EST0017A policy, which refers to the provision of housing for people under the age of 18, be removed.

In addition, the Department of Housing Policy ALL0030A: Eligibility for Public Housing uses conflicting language to the of the EST0017 policy stating:

*Generally, an applicant must be at least 18 years of age before they can be considered for public housing. The Department will consider applicants who are under 18 if:*

- *They meet all eligibility criteria for public housing, and*
- *They have an income*

This eligibility policy uses language which can be seen to contradict the minors and housing assistance policy, stating applicants “must be at least 18 years of age” and then going on to list the provisions and circumstances under which those under 18 years of age will be considered by the Department. In contrast the minors policy uses the word “may” in reference to assisting under 18’s. Whilst these points could be considered to be a matter of semantics, YAA posits that it is these issues that often cause the greatest deal of interpretation issues and confusion by local Department of Housing officers and the youth sector alike. YAA recommends that the Department review the policies ALL0030A and EST0017A to ensure that they are consistent in their terms regarding assisting people under 18 years of age.

Further to this, YAA has concerns for the way in which 16 to 18 year olds are assessed for living skills in comparison to clients over the age of 18. The issue YAA has identified relates to the frequency with which under 18 year olds living skills are assessed when compared to those over 18 year old clients and the related practical level concerns. The message YAA is receiving from youth accommodation services across NSW is that there is a common assumption occurring at local level Housing offices whereby under

18's are often assumed to have insufficient living skills and require assessment. The practical level concerns in relation to this often-held assumption are as follows:

- Who makes the initial assessment of the under 18 year old clients and what level of training or expertise do they have in dealing with the relevant issues raised when working with under 18 year olds?
- What constitutes the decision that under 18 year olds require a living skills assessment beyond those clients over 18?

Upon analysis of the Minors and Housing Assistance policy, combined with response from youth accommodation field workers, what becomes apparent is a lack of understanding in relation to those clients under the age of 18 who require housing assistance. The assumption that these young people are not as equipped with living skills, compared to adults or older clients, in many cases is unfounded. For example, many under 18 year old clients have exited from SAAP services and therefore have undergone intensive living skills programs ranging from budgeting and cooking skills to social skills etc. It is also important to note that youth SAAP services do a great deal of work in increasing the independence and transitioning skills of their under 18 year old clients. Whilst YAA understands that there are many under 18 year old Department clients who have not come directly from SAAP services, any assumption made by local Department of Housing workers that under 18's are less equipped with living skills, and therefore require a living skills assessment based purely on their age, is a prejudiced assumption and should be dealt with accordingly by the Department.

Therefore underlying the Department Minors and Housing Assistance policy is the inherent implication that those clients under the age of 18 are less capable of sustaining a tenancy in comparison with older or adult clients. YAA recommends that the Department revisit its eligibility requirements in relation to under 18 year olds and implements training and education for all Department staff responsible for intake and assessment of under 18 year old clients to ensure the eradication of this common assumption by Department employees.

In addition YAA also recommends, in relation to under 18 year olds and successful tenancy, that appropriate staff training within the Department of Housing be implemented to support young people once they have been housed. This early intervention model of support could also be implemented across the board for all Department clients.

Whilst it appears this submission is greatly concerned with eligibility criteria rather than the allocations policies, it is worth noting that unless young people are eligible, they cannot be part of the allocation process. Data from the Department of Housing's Annual Report 2004-2005 shows that only 6% of household heads were between the ages of 18-24 years. There is no data available at the time of writing this submission of the percentage of young people under 18 years of age who were household heads during this same period. We can only assume the percentage would be even less.

## **Role of community housing in meeting the demand for social housing**

YAA has identified an issue of concern with the role of community housing in meeting the demand for social housing, with a particular emphasis on young people under the age of 18. This issue relates to the eligibility requirements for community housing and the Department of Housing, which can be interpreted as mirror policies. This effects young people under the age of 18 as they are often over looked for both community and public housing, leaving them either stuck within an overloaded SAAP system or homeless in the absolute sense. Previously community housing providers were considered to be a viable exit point for under 18 SAAP clients however due to policy changes the move towards common waiting lists has resulted in this option being slowly eroded.

What is becoming more apparent within the youth accommodation sector is the gap within the social housing system whereby young people exiting SAAP do not have guaranteed exit points beyond the private rental market. With the well documented increase in private rental costs, combined with the social disadvantage experienced by young people wanting to gain access to this market, it is apparent that there is a strong need for SAAP exit point alternatives. YAA believes that social housing is one such viable exit point from SAAP services for under 18 year old clients but there are also other alternatives which could be investigated by the Department of Housing. YAA recommends that stock be made available for a post-SAAP or post-transitional housing project. YAA also points to the work that has been done in the Miller Foyer project as an alternative model for the provision of social housing for under 18 year olds.

## **Conclusion**

YAA values this and future opportunities for consultation on the inquiry into the allocation of social housing as we recognise its importance in the fair and equitable provision of housing in NSW.

Whilst we acknowledge the Department of Housing's commitment to the inquiry process we believe that more should be done to ensure that the eligibility criteria in relation to young people is reviewed in accordance with YAA's, and the sector's response, to this inquiry.

In summary, the lack of allocated social housing in NSW is putting an unnecessary added strain on young people and early adults within our community who experience discrimination and adversity through their homeless status. This pressure can be alleviated by the Department of

Housing with the provision of better access and more affordable housing options for this group within our community who experience significant needs and barriers.

## **Recommendations**

- YAA recommends that the allocations inquiry will be used to build upon the Reshaping Public Housing reform, particularly those reforms related to youth policies and housing allocations
- YAA recommends that the use of the word “may” in the EST0017A policy, which refers to the provision of housing for people under the age of 18, be removed to prevent local level interpretation issues
- YAA recommends that the Committee review the policies ALL0030A and EST0017A to ensure that they are consistent in their terms regarding assisting people under 18 years of age
- YAA recommends that the Committee revisit its eligibility requirements in relation to under 18 year olds and implements training and education for all Department staff responsible for intake and assessment of under 18 year old clients.
- YAA also recommends, in relation to under 18 year olds and successful tenancy, that appropriate staff training within the Department of Housing be implemented to support young people once they have been housed. This early intervention model of support could also be implemented across the board for all Department clients.
- YAA recommends that the eligibility criteria for community and public housing be revisited to ensure that under 18 year olds who have not been provided with housing assistance do not fall between the gaps that these eligibility criteria create.