Community Housing Federation of Australia

Submission

NSW Parliament Public Bodies Review Committee

Inquiry into the Allocation of Social Housing

February 2006

1 Introduction

As the national peak body for community housing, the Community Housing Federation of Australia (CHFA) is well placed to provide a submission for the NSW Parliament Public Bodies Review Committee's Inquiry into the Allocation of Social Housing. More specifically, CHFA has a responsibility to represent the views and concerns of its member organisations regarding matters which concern them.

Although the Australian Housing and Urban Research Institute (AHURI) produced a positioning paper and final report on the topic of allocation systems in social housing in 2002[1], CHFA believes that these documents provided a greater focus on public housing than community housing. CHFA wants to better communicate the needs of community housing organisations (CHOs) regarding social housing allocation systems. A key area that the *Inquiry into the Allocation of Social Housing* seeks to address is social housing allocation systems in jurisdictions other than NSW. This submission details the positions of three community housing peak bodies in Australia.

2 Participants and Methodology

To obtain information from organisations on social housing allocation systems and the impact it may have on them, the state based community housing peak bodies and other non-government organisations who comprise CHFA's membership were emailed. The email asked the following questions:

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[1] Hulse, Kath (2002) *The Changing Role of Allocations Systems in Social Housing*, AHURI.

- Does your state/territory have a separate allocation system for public and community housing? If so, what is it and how does it operate? If not, how is community housing allocated in your jurisdiction?
- Is your state/territory moving towards a common register?
- What is your opinion of the system in your state/territory? Could it be improved? If so, how? What are the strengths and weaknesses of your system?

Three state peak bodies responded to this correspondence and have participated in this submission. These were: the Queensland Community Housing Coalition (QCHC), the Community Housing Coalition of Western Australia (CHCWA) and Shelter TAS. Other peak bodies do not have a formal policy position on the matter and as such were not well placed to offer their input into the submission.

All three were particularly interested in the subject of a common registers as part of a shared allocation system across the social housing sector. Both QCHC and CHCWA have produced papers on the topic[2]. QCHC's paper, *Paving the Way: Housing People in Need in the Smart State*, outlines concerns of the community housing sector if the public and community housing waiting lists were merged in the event of a common registry model being adopted. The paper puts forward a model for a common registry which would operate within a multi-provider system. The CHCWA paper, *Common Waiting Lists*, discusses the position of the Western Australian community housing sector in relation to a common registry model. Shelter TAS has also showed an interest in a common registry model for social housing in Tasmania. It believes, however, that the need for a common registry is more important for prospective tenants than community housing providers. Each of the positions from these three peak bodies will be discussed in greater detail below.

3   Findings

In regards to the relationship between social housing allocation systems and the community housing sector, the subject of a common register was of significant interest to the three organisations who responded. Currently there are no common registries operating in Australia. CHCWA notes that "State Housing Authorities manage central wait lists, whilst community housing providers maintain their own wait lists or operate alternative allocation practices[3]." Debate over whether or not states should adopt common registry allocation systems for social housing has intensified over the last five years.

The adoption of a common registry can be approached from the perspectives of both CHOs and prospective tenants. While all three state peak bodies involved in this submission acknowledged the usefulness of common registries for potential tenants, they were also quick to point out the possible advantages and disadvantages a common registry would have in their state, as well as possible models a common registry could assume.

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[2] See: QCHC (2005) *Paving the Way: Housing People in Need in the Smart State*; and Tina Merry (2004) *Common Waiting Lists*, CHCWA.
[3] Tina Merry (2004) *Common Waiting Lists*, CHCWA, p. 9.

The policy positions of each of the three state peak bodies on the subject of a common registry are outlined below. While most information from QCHC and CHCWA was obtained through their publications and policy documents, Shelter TAS participated in an interview.

Shelter TAS

Currently Tasmania has separate allocation systems for community and public housing. Shelter TAS believes that a common registry may not be feasible in Tasmania due to the small size of its community housing sector. One benefit of a common registry, however, would be the advantages a single entry point would have for prospective tenants. However, the concern was also raised that a common registry could in fact limit the autonomy of prospective tenants, rather than improve choice. Shelter TAS also brought up the issue of resourcing, and questioned the way in which a common registry would operate in relation to specialist organisations with opposing political ideologies. One option suggested was that the Tasmanian community housing sector develop its own common registry before merging with the public housing waiting list to form a common registry for social housing.

CHCWA

The following summary is based on the report titled *Common Waiting Lists*[4]. The report acknowledges the importance of introducing a common registry, because of the advantages of having a single entry point for clients into social housing. The report also outlines four primary ways in which a common registry would benefit both clients and the social housing sector. These are: improved customer service, improved customer choice, improved consistency and improved data accuracy.

The report raises an important consideration for the community housing sector: how the government will distribute funds if an increased demand for community housing were to become evident with the introduction of a common registry. CHCWA questions the way in which CSHA funds would be distributed between the public and community housing sectors—would funding be dependent on demand, or would the two sectors become competitors forced to adhere to similar guidelines? Conversely, a fear exists that this type of system could lead to the merging of the public and community housing sectors, and may force community housing providers to adopt allocation procedures which are counter to the ideological ethos of community housing.

The report also makes a list of recommendations for a common registry model. Those include the need to:
- Regularly review and validate the waiting list to ensure that it remained an accurate record of all social housing applicants;
- Manage storage, retrieval and disposal of documentation;
- Provide information about the past and current waiting list situation to the public, government, applicants and providers;

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[4] Tina Merry (2004) *Common Waiting Lists*, CHCWA.

- Evaluate housing outcomes to assess whether applicants were being appropriately assisted; and
- Provide an appeals system which would be appropriate to both public and community housing tenants and applicants.[5]

The report also highlighted considerations for the implementation of merging waiting lists.

QCHC

The following is a summary of a submission to the Queensland State government, produced by QCHC regarding a common registry for the allocation of social housing in Queensland.

As a part of their submission to the State Government, QCHC developed a common registry model which could potentially be adopted within a multi-provider system. The model is designed to:
- Strengthen the multi-provider system by providing a commonly owned and collectively managed system;
- Meet the needs of applicants in a fair and consistent manner;
- Facilitate access and assessment through a choice of government and non-government providers.
- Consider and balance the needs of applicants, fellow tenants, neighbours and the wider community;
- Reflect differing local housing markets, service systems and housing needs; and
- Accommodate future evolution and innovation through a range of built in processes.[6]

The report also draws attention to other basic points concerning the formation of a common registry.

As a part of their model for a common allocations registry, QCHC discussed in length the key features of their proposed common register system. These are as follows:

1. Adopt standard eligibility requirements, set at a basic income/asset test level which is designed to capture the true level of unmet need.

2. Have a wide range of entry points (Assessment Centres) where a standardised application form can be completed by email and added to a centralised list. The report notes that as many a half of the CHOs will not want to be entry points, particularly if they have low stock, low turnover and/or limited capacity to handle entry.

3. The abovementioned Assessment Centres should be approved on agreed criteria and should be competency based. At least one non-government service should be available in each area, with rural areas needing additional

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[5] Ibid, p.19.
[6] QCHC, 2005, Paving the Way: Housing People in Need in the Smart State, p. 12.

assessment service points. Existing Community Rent Scheme and multi-provider points could also be included as Assessment Centres.

4. That the waiting list be segmented into needs based groups and include targets for housing a percentage from each segment of needs over each year or given time period. This segmented waiting list should be linked to the Match Maker Map (see below).

5. Develop a Match Maker Map to allow CHOs to identify their specialism and their capacity to meet different segments of need. This is a crucial innovation of the model. As an example, a South Sea Islander CHO could identify its specialism (that it exists to meet SSI housing need). Within this target group, it could note its capacity to allocate 40% of its stock to people with complex needs, 30% to people with moderate needs and 30% to those on low incomes. The same would be true for other specialist community housing providers, be they cultural, youth, Indigenous, aged or disability services.

   Under QCHC's proposed model, general needs providers would still identify their capacity and targets for the differing segments. Targets would be reported on through an Annual Allocations Data Return. All allocations, appeals and complaints would be monitored by a person independent of all social housing landlords. The system would be transparent and also allow decision makers to target additional resources to particular services to boost capacity to meet additional complex needs.

6. QCHC's proposal for a 'State Of Readiness' kit and a self assessment process would assist organisations to map compliance, viability, specialism and capacity in order to provide an evidence base to assess the position of organisations. This could be used as a tool to help achieve consistency of assessed role in the new system, and also to glean useful data on state of readiness in the sector, along with resourcing needs.

7. Allocations would be made to each community housing provider from a 'pool' of eligible applicants that match the provider's specialism and capacity targets. The final decision on housing allocation would rest with the provider, who would need to be able to control the allocation in order to achieve a successful match between tenant, property and neighbourhood. The target setting, annual reporting, monitoring and appeals/complaints systems would minimise the risk of 'cherry picking'.

   There would be two tiers of access to the applicant pool. A provider that is an approved assessor would already have direct access to the Wait List, and would be able to draw their pool from the top of the appropriate segment. A provider who did not have direct access to the list could forward details of a vacancy and the target group via email to their nearest Assessment Centre. Assessment Centre staff could then furnish the provider with the contact details of prospective tenants.

8. A local discretion policy would operate in tandem with the allocations policy, allowing each provider to consider an agreed number of factors in making a final allocation determination. This may be particularly useful in deciding

between similar needs tenants by discretionary use of local connection, or through an assessment of whether appropriate support services exist in the community. For example if a person with severe mental health problems were to apply for housing in an area with no mental health services, this policy could help facilitate a common sense decision.

9. Under this proposed model, the issue of training and resources for Intensive Housing Management across the social housing system would still need to be addressed. QCHC has an outline for a kit to assist providers.

10. QCHC submits that where support is required for people with complex needs, the government should consider the following options:

- A tied approach to rehousing clients of other government departments to ensure appropriate support levels are maintained;
- A "Sustainable Tenancy" package, based on the Job Network Intensive Support Package, to go to providers housing people with complex needs; and
- Extension of same house/different landlord to outsource management of complex needs clients along with an agreed funding package to CHOs.

11. Exploring the reform of SAAP and an extension of its roles as outlined in QCHC submission to the Minister, *New Directions And Community Housing.*

4   Conclusion

All three state peak bodies outlined advantages of common registries for the allocation of social housing. There are particular advantages for prospective tenants. It is also evident, however, that further debate is required, and that a range of models and their suitability to adapt and fit within a given jurisdiction need to be investigated.

The development of a model for a common social housing allocations registry will need to be mindful of the key strengths of community housing, and ensure that these are safeguarded. These strengths include the high level of tenant participation in the management of their housing, the responsiveness of CHOs to tenants and members, flexibility, and the range of functions in addition to housing management that CHOs perform in their local communities. It is important that any changes to existing allocation systems respect the integrity of individual community housing providers and their tenants, and maintain a clear distinction between the different types of social housing.

CHFA will gladly respond to any comments or queries the Inquiry may have.