

**Submission
No 1**

**EXAMINATION OF AUDITOR-GENERAL'S PERFORMANCE AUDIT
REPORTS AUGUST 2018 - JANUARY 2019**

Organisation: Department of Communities and Justice

Date Received: 30 July 2019



Legislative Assembly
Public Accounts Committee
Parliament of New South Wales
6 Macquarie Street
Sydney NSW 2000

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Ref SGM19/1477

Dear Public Accounts Committee

Performance Audit – Managing antisocial behaviour in public housing

I wish to advise that over the past 12 months the Department of Communities and Justice (DCJ) has implemented all five recommendations made by the Audit Office of NSW following its performance audit of antisocial behaviour in public housing undertaken in 2018.

Please see enclosed a table with the original recommendations, DCJ actions in response to each item and corresponding documentary evidence.

DCJ welcomes the opportunity to improve services and outcomes for our clients, neighbours and surrounding communities and the actions taken through this audit will enhance services.

If you would like to discuss anything further, please contact [REDACTED]
[REDACTED]

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. Coutts-Trotter'.

Michael Coutts-Trotter
Secretary

30 JUL 2019

PERFORMANCE AUDIT – Managing antisocial behaviour in public housing

IMPLEMENTATION OF RECOMMENDATIONS

	Recommendation	Accepted or Rejected	Actions to be taken	Due Date	Status (completed, on-track, delayed), Comment	Responsibility
1	The Department of Communities and Justice (DCJ) should, by August 2019, address the identified functional problems with the information management system HOMES-ASB and ensure that housing staff can use this system to record and manage antisocial behaviour.	Supported	<ol style="list-style-type: none"> DCJ is committed to addressing the functional issues experienced by staff with changes already underway. This includes the removal of the requirement that staff must wait 24 hours before issuing a warning letter or a strike notice, which was initially introduced to create a delay before notices could be issued based on stakeholder feedback but has not proven necessary. Additionally, face to face training provided statewide over the past 12 months, has included tips on how to address the 'functionality gaps', 	August 2019	<ol style="list-style-type: none"> Complete. IT system changes are complete and were implemented in two phases. Phase 1 (30/11/18) and phase 2 (28/02/19). Evidence as follows; ASB Business Requirements Specifications and Configuration design D18/1560305, D18/1553825, D18/1869671, D18/1872851, D19/419001, D19/712791. Updated User Guide (includes HOMES screen shots) (HOD15/2065682). Client Service Notice to staff with a list of updated operational documents (D18/1096446, D18/1668210, D19/150603, D19/684752). Complete 30/11/18. The User Guide with HOMES screen shots was updated and a Client Service Notice (CSN) was issued to staff. Evidence at (D18/1856403 & D18/1856422). Complete. Training material and staff attendance. Evidence at (D18/1211152, D18/1184489, D18/1197608, D18/1830434 D18/1829373, D18/1823701, D18/1804550 & D18/1800824). 	Housing Statewide Services

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			<p>which often result in user error.</p> <p>4. DCJ has also implemented statewide training for staff with keystroke training (30 sessions held), troubleshooting, policy clarification and how to remedy common errors using the system.</p> <p>5. A revised User Guide has been drafted and will be implemented in parallel to the HOMES-ASB system changes.</p>		<p>4. Complete 30/11/18. Training material and staff attendance evidence at (D18/1211152, D18/1184489, D18/1197608, D18/1830434 D18/1829373, D18/1823701, D18/1804550 & D18/1800824).</p> <p>5. Complete. Updated User Guide with HOMES screen shots and CSN to staff. Evidence at (HOD15/2065682, D18/1096446, D18/1668210, D19/150603).</p>	
2	<p>The Department of Communities and Justice should, by August 2019, improve the quality of data collection and reporting on antisocial behaviour to ensure oversight of:</p> <ul style="list-style-type: none"> the extent of antisocial behaviour the types of incidents occurring increases or decreases in incidents over time the outcomes of DCJ interventions 	Supported	<p>1. DCJ publishes data on the number of investigations, warnings and strikes that have been issued on the DCJ website. This data is published on a six monthly basis, detailing the number of minor and moderate warnings and strikes and activity around serious and severe illegal matters. There is evidence that matters have been investigated and that there is a deterrence</p>	August 2019	<p>1. Complete. Please refer to the ASB dashboard on the DCJ website at: https://www.DCJ.nsw.gov.au/about/reforms/future-directions/initiatives/antisocial-behaviour/antisocial-behaviour-data-dashboard</p>	Housing Statewide Services

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			<p>effect for many tenants who receive a warning. DCJ can report on the nature of ASB as evidenced by the data already provided to the Auditor-General that identifies the types of behaviours classified.</p> <p>2. DCJ will give consideration to the inclusion of a trend graph in the Antisocial Behaviour Dashboard to publicly illustrate the trends in the deterrence effect of the policy.</p> <p>3. Supplementary staff training will be provided on using the HOMES-ASB system and the system upgrades which are underway. This will improve the manner in which information is captured, staff efficiency in navigating the process, leading to improved capacity to report on trends over time.</p>		<p>2. Complete. Consultations with DCJ Corporate Governance and Reporting to establish a more meaningful representation of ASB data has resulted in an adjusted view of the ASB dashboard to show comparative data over time. This data will be published as at 30 June 2019 and will be publicly available in August 2019.</p> <p>3. Completed in two phases. Phase 1: 30/11/18 and phase 2: 28/02/19. All staff were reminded of the availability of the ASB Summary Report to monitor ASB Business Actions. Modified ASB Summary Report issued with clarified fields and gaps addressed. Updated operational documents and new user guide delivered 30/11/18. Example copy of the revised ASB-HOMES Summary Report; training content and attendance sheets (D18/1334233, D18/1211152, D18/1184489, D18/1197608, D18/1830434 D18/1829373, D18/1823701, D18/1804550 & D18/1800824)</p>	
3	The Department of Communities and Justice should, by August 2019,	Supported	1. Both formal and informal working arrangements already	August 2019	1. Complete. Co-designed ASB referral form with the Ministry of Health and input sought from peaks	1. Housing Statewide Services

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	work with relevant government agencies and non-government support services to coordinate case management approaches to support public housing tenants with complex needs.		<p>exist between DCJ and other government and non-government agencies that support a case coordination and case management approaches to tenants.</p> <p>2. DCJ will make a change to its ASB policy to encourage tenants to connect with support services. If tenants accept referral to support services, they will receive a warning for the first instance of substantiated antisocial behaviour, but if they do not accept, a strike notice will be issued. This policy incorporates clear referral pathways for tenants where there has been a substantiation of an ASB incident. This will provide tenants with even further supports to modify their behaviour and sustain their tenancies.</p> <p>3. DCJ will also continue to actively participate in whole of government</p>		<p>(D18/1858134). DCJ and ATAAS MOU is in place (D18/1857964).</p> <p>2. Complete 30/11/18. Revised ASB policy, referral letter and form implemented on 30 November 2018; Client Service Notice disseminated to staff (D18/1858072, D18/1858134 & D18/1856403).</p> <p>3. Ongoing. In addition, the operation and function of the DIACCs will be reviewed as part of the Housing and Mental health Agreement (HAMHA) review. This review</p>	<p>2. Housing Statewide Services</p> <p>3. Commissioning and Districts</p>

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			<p>arrangements. These include:</p> <ul style="list-style-type: none"> Housing and Mental Health District Implementation and Coordinating Committees (DIACC) District Homelessness Implementation groups (DHIGs); and Safety Action Meetings (SAMS) led by NSW Police. 		<p>is due to be completed in August 2019. DHIG and SAMS meeting agendas and minutes provided as evidence.</p> <p>SAMS</p> <p>Western NSW Orange AF18/287, Bathurst AF18/4092, Dubbo AF18/29178, Parkes AF19/2176</p> <p>South Western NSW Fairfield AF18/35667, Campbelltown HOA/297593, Liverpool AF17/24501, Bankstown HOA/84490</p> <p>Western Sydney Nepean Blue Mountains Main- HOA/295156 Penrith SUB18/53739, Bathurst SUB18/156442, Parramatta SUB19/74937 Blacktown HOG16/99943 Mt Druitt HOG16/99942.</p> <p>Central Coast Central Coast AF19/12742 Wyong SUB19/74771 and SUB19/74771, Gosford SUB19/74769 and SUB19/74767</p> <p>DHIG AF18/1677 - Western NSW ADF15/2647 - South Western NSW AF18/249 – Western Sydney Nepean Blue Mountains HOG17/5107 – Central Coast AF17/11977 – Illawarra Shoalhaven District</p>	
4	The Department of Communities and Justice should, by August 2019, work with NSW Police to develop formal, regular,	Supported	DCJ supports this recommendation within the framework of the existing Memorandum of Understanding (MoU) with	August 2019	Complete. A new MOU has been signed by DCJ Secretary and the NSW Police Commissioner (D19/790993, D19/583877, D19/583887).	Housing Statewide Services

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	information sharing arrangements that enable housing staff to proactively manage safety and security in public housing.		NSW Police which provides a formal and controlled exchange of information between DCJ and the Police. DCJ will work with the Police as it does now to exchange information to respond effectively to antisocial behaviour and enhance the safety of public housing communities.			
5	<p>The Department of Communities and Justice should, by August 2019, review staff capacity and capability to manage ASB including:</p> <ul style="list-style-type: none"> • staffing allocations in remote and regional areas • antisocial behaviour specialist skills in housing offices • targeted training for frontline housing staff based on local requirements • enhanced opportunities for staff to share techniques for managing antisocial behaviour across DCJ frontline housing offices and Districts. 	Supported	<p>1. <i>Staffing allocations in remote and regional locations:</i> Based on the low levels of ASB allegations in these remote communities and the current CSO to dwelling ratio which is lower than in metropolitan areas, DCJ believes staffing allocations in remote and regional locations are sufficient to meet the requirements of property and tenancy management. In remote locations, without permanently posted staff, there are a range of outreach programs and access channels such as</p>	August 2019	<p>1. Complete. DCJ has undertaken a Resource Allocation review. Regional areas are adequately resourced and staff have received appropriate training. Districts that manage remote and regional locations can review their staff / property and ratios within their existing allocation to meet operational requirements.</p>	1. Districts

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<ul style="list-style-type: none"> techniques and skill development in risk assessment and safety approaches. 		<p>phones and online services available.</p> <p>2. <i>Antisocial behaviour specialist skills in housing offices:</i> DCJ already has staff skilled in interviewing, investigating and dealing with ASB. DCJ emphasises that because positions aren't titled as Antisocial Behaviour Specialists does not mean that they are not equipped to manage ASB matters. DCJ will consider how staff managing ASB, especially specialist officers, can have a position title that reflects this responsibility. DCJ will also include training in ASB in its compulsory training and accreditation program which applies to all DCJ Client Service Officers - LEAP.</p> <p>3. <i>Targeted training for frontline staff based on local arrangements:</i> Targeted training is in</p>		<p>2. Complete 30/11/18. Consulted with frontline staff regarding working requirements and key responsibilities. DCJ Human Resources advised there is no formal ASB Specialist position title or role description. ASB Specialist staff are hired under Senior or Specialist roles. Role descriptions for Specialist and Senior CSO roles are at (D18/1859067 & D18/1859061)). Increased ASB information has now been included in LEAP. (D18/1860643 & D18/1860631)</p> <p>3. Complete. Training and update of the HOMES user guide is complete. Copies of Phase 1 and Phase 2 webinars; previous training content and attendance sheets are available in the following documents</p>	<p>2. Housing Statewide Services</p> <p>3. Housing Statewide Services</p>

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		<p>place and will continue as required for frontline staff. The revised ASB policy and user guides will enable additional training opportunities for staff to redress inconsistencies in the application and usage of the policy and system. In addition to previous training provided, over 30 face to face training sessions were completed between March to May 2018 on how to use the HOMES-ASB system, including troubleshooting tips and policy clarifications.</p> <p>4. <i>Enhanced opportunities for staff to share techniques for managing antisocial behaviour across DCJ frontline housing offices and Districts:</i> DCJ will consider opportunities for staff to share practice in ASB management. DCJ will implement monthly webinars with team leaders to highlight</p>		<p>(D18/1211152, D18/1184489, D18/1197608, D18/1830434 D18/1829373, D18/1823701, D18/1804550, D18/1800824). ASB phase 1 (D18/1859146) and Phase 2 (D19/532345, D19/460618, D19/460614, D19/460613, D19/460610) training content and attendance. Training content and attendance of previous sessions (D18/799641 & D18/341493); revised HOMES-ASB User Guide (D18/1859146).</p> <p>4. Complete. DCJ has monthly Team Leader webinars where best practice can be shared (D18/1184506). Districts with limited ASB experience have tested the new HOMES system steps and operational documentation and found the content useful. Webinars are held on the 4th Wednesday of every month to disseminate information on policy, process and procedure updates (D19/667502).</p>	4. Housing Statewide Services

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			<p>issues that are identified, share practice improvements and feedback on policy implementation, as well as ASB management.</p> <p>5. <i>Techniques and skill development in risk assessment and safety approaches:</i> Both the focus and language used in the Learning, Engagement and Professional Development Program (LEAP program) to be modified to reflect how the approaches discussed in training can assist in the management of ASB, de-escalation of issues, and risk management.</p> <p>6. DCJ will consider the broader rollout of the Community Services Predicting and Managing Occupational Violence (PMOV) training to DCJ housing staff that have direct client contact.</p> <p>7. The continued roll out of the DCJ LEAP program will equip</p>		<p>5. Complete. In November 2018, LEAP material was modified. LEAP focus and language has been adjusted to reflect this recommendation and material is currently being delivered to staff. Modified LEAP content (D18/1860643 and D18/1860631).</p> <p>6. Complete. This training has been rolled out more broadly to DCJ Housing staff. To date 579 DCJ Housing staff have completed and passed the PMOV training. PMOV attendance report D19/879721.</p> <p>7. Complete. LEAP training continues for CSOs with over 350 CSOs now fully qualified under the Certificate IV in Social Housing. The current cohorts of staff undertaking</p>	<p>5. Housing Statewide Services</p> <p>6. Housing Statewide Services, Ignite, Workplace Health and Safety</p> <p>7. Housing Statewide Services</p>

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			<p>frontline Client Service Officers with the skills required to de-escalate situations, assess risks and stay safe.</p> <p>8. All DCJ Housing frontline staff are already trained in <i>Staying Safe in the Field</i> techniques; and</p> <p>9. Have the <i>SafeTCard</i>, a monitored GPS system that can record and monitor situations in the field.</p> <p>10. DCJ will also ensure that safety kits are present in every office.</p>		<p>LEAP for CSOs will complete their training by November 2019 with DCJ committing to an ongoing commitment for the training to continue for all new staff.</p> <p>8. Complete 25/01/19. 201 DCJ staff have completed the SSIF course D19/111632. Course content has been revised and updated. (D19/111625, D19/111620).</p> <p>9. Complete. 05/06/19 WHS have modified Fieldwork Safety Standards to ensure SafeTCard information is accurate.</p> <p>10. Complete. 208 safety kits have been distributed to teams across the State (D19/349729).</p>	<p>8. Workplace Health and Safety</p> <p>9. Workplace Health and Safety</p> <p>10. Housing Statewide Services, Workplace Health and Safety</p>