



Provision of Social Housing Inquiry

Submission to

Legislative Assembly for the ACT
Standing Committee on Health, Community and Social Safety

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About ACT Shelter

ACT Shelter is an independent peak community organisation funded by the ACT Government to provide strategic advice and advocacy to assist people on low to moderate incomes on housing issues. This includes people who are homeless or who are at risk of homelessness.

Our role is to provide an informed voice on housing policy issues based on research and close collaboration and consultation with housing consumers and community based organisations working on housing and related issues.

We promote housing options for people on low incomes, including social housing (public housing and community housing), affordable housing provided through the private sector, and affordable home ownership.

ACT Shelter is a member based organisation with over 100 members including individuals and organisations who have an interest in ensuring the availability of affordable, secure and appropriate housing in Canberra. Many are actively involved in the provision of housing support and services.

We hold regular forums and special meetings on housing issues of concern to people in the ACT and we encourage community participation in identifying important issues.

ACT Shelter disseminates information through its newsletter, website and forums, and develops networks of people with common interests in housing issues. We have a strong brief to work with people experiencing particular disadvantage in the housing market, such as women, young people, those with a disability or mental illness, Aboriginal and Torres Strait Islander people and those from culturally diverse backgrounds.



Introduction

ACT Shelter is pleased to respond to the ACT Legislative Assembly Provision of Social Housing Inquiry. In this submission ACT Shelter draws on our experience of advocating for accessible, appropriate, secure and sufficient social housing in the ACT. We draw specifically on the expertise of our members and member organisations including providers of social housing and support to social housing tenants and applicants.

The Provision of Social Housing Inquiry is an opportunity to address longstanding concerns about the management of social housing, including the housing application and allocation process. However these matters cannot be addressed without attention to the lack of affordable housing options for low to moderate income earners in the ACT. Therefore this submission addresses both of these areas.

This submission to the Inquiry identifies actions for the Department of Housing and Community Services (DHCS), other areas of government and for non-government providers of housing and support, including areas for further collaborative work between DHCS and community housing and support providers. The recommendations in this submission are intended to:

- improve the response to people applying for social housing;
- increase the availability of social housing particularly for vulnerable people; and
- create more affordable housing options for low to moderate income earners.

Given the broad terms of reference of the Inquiry, this Submission focuses on two areas. Part 1 addresses the response to social housing need. This includes issues related to 'managing' the waiting list (Inquiry Terms of Reference number 3), eligibility for "early allocation" of social housing (TOR 2), and communication and responsiveness to applicants for social housing (TOR 1 and 6). Part 2 suggests some measures necessary for improving the supply of social and affordable housing in the ACT (TOR 3 and 4). Part 2 also suggests some ways to improve access to social housing in the short term including through a review of the operation of the Social Housing Register (TOR 3).

Context

Housing costs in the ACT have increased significantly in the ACT in the past decade, reflecting a national trend. The median house price in the ACT almost doubled between 2000 and 2003 aloneⁱ and purchasing a house in Canberra is more expensive than any other capital city excepting Sydney.ⁱⁱ Median weekly rents in the ACT are consistently amongst the most expensive of all Australian capital cities, and rental vacancy rates in the ACT are the lowest of all jurisdictions. In June 2011 the ACT rental vacancy rate was 0.7 per centⁱⁱⁱ. The ACT's high average income, and the very limited availability of affordable rental, affordable purchase and social housing relative to demand and need for these options, has produced a market that presents few appropriate options for low to moderate income earners. Close to 40 per cent of low income households in the ACT rental market experience housing stress (expending more than 30 per cent of household income on housing costs) and more than 40 per cent of low income households in the ACT experience mortgage stress.^{iv} In the ACT as in all states and territories, lack of affordable housing options produces housing stress, housing insecurity, marginal tenures and homelessness among people with low incomes. With this comes associated negative flow on effects on individuals, families and the community.

While the ACT has more public housing stock as a proportion of total housing stock than any other state or territory at around nine per cent^v, investment in new public housing has not kept pace with population growth. Also the ACT community housing sector is small compared to other jurisdictions. Under-investment in new social housing stock and an increasingly unaffordable housing market (particularly for private rental) have placed greater pressure on the ACT social housing system. As demand, need, and unmet need for social housing have grown, eligibility criteria have been tightened. Social housing has been repositioned as a response to the housing needs of people experiencing the greatest need for housing, and the greatest degree of social disadvantage. As a result the social profile of residents has changed, presenting more complex requirements for support.^{vi}

In recognition of the seriousness of housing affordability challenges, the ACT Government has introduced a range of recent reforms. This includes through agreements with the Federal government under the Social Housing National Partnership Agreement, the Nation Building and Jobs Economic Stimulus, the Homelessness National Partnership Agreement and National Rental Affordability Scheme and through the ACT Affordable Housing Action Plan. In the context of these broader reforms, DHCS is commended for its commitment to:

- sustaining tenancies and preventing evictions into homelessness;
- working with non-government providers of housing and support to provide integrated responses to homelessness and housing need, including through the Social Housing Register, Common Access Gateway and First Point referral system to specialist providers of homelessness support services including accommodation.

ACT Shelter affirms the value of these reforms. However the ACT Ombudsman's June 2011 report *Housing ACT – Assessment of an Application for Priority Housing* confirms the need for further action to improve the response to applicants for social housing including to people who are homeless or at risk of homelessness. In a context characterised by a lack of affordable housing options, there is a demonstrated need for better management of existing social housing stock, enhanced responsiveness to applicants, and medium to longer term planning to address social and affordable housing undersupply.

In this context ACT Shelter affirms several guiding principles for housing policy and program reform. These are:

- Affordable, accessible, secure and appropriate long-term housing must be available in adequate quantities to meet demand. The principles of affordability, accessibility, secure and safe tenure apply across purchase, private rental, public and community housing.
- The current reforms to ACT affordable housing and homelessness services and policy (including through the ACT Affordable Housing Strategy and Homelessness National Partnership) establish a strong foundation for improved responses to housing issues in the ACT.
- There is a need for renewed and sustained commitment from all agencies involved to ensure that these reforms are implemented in a timely manner, and that the housing rights of low to moderate income earners are at the forefront of housing affordability reforms in the ACT.
- Sustained, significant and well-planned investment in new social (public and community) housing stock is required as part of an appropriate long term housing strategy for the ACT.

- Targeted housing and, where appropriate, non-housing support responses are required for specific cohorts including young people; those exiting primary homelessness; women and children leaving domestic violence; people with disability or mental illness; older people; and those exiting institutions.
- Effective partnership between DHCS, other government departments, community providers of social housing and support, and commercial providers of affordable housing are required to improve the response to people in housing insecurity.

Discussion and recommendations

1. Responding to social housing need

1.1 Caps on Priority housing allocation

Social housing providers in the ACT struggle to meet demand for social housing including from applicants who are experiencing urgent housing need. Until September 2011, eligibility for Priority “early allocation” of social housing was limited to 150 people under the Housing Assistance Public Rental Housing Assistance Program (Housing Needs Categories) Determination 2011 (No 2). The numerical cap on Priority allocation sought to manage demand by allocating housing on a needs basis, but it obscured the extent and depth of housing need in the ACT. The cap was removed in September 2011. This is an appropriate reform. Numerical limits on the Priority wait list are not transparent and are inconsistent with a rights-based or a human services approach to housing provision. They also place inappropriate stress on DHCS officers to compare the depth of housing need of people who met the criteria for priority allocation.

Removal of the cap on priority allocation is an appropriate reform of the *Public Housing Rental Assistance Program (Housing Needs Categories)* legislation. Removing the cap better recognises the extent and depth of social housing need in the ACT. This is necessary for planning short and longer term coordinated responses to social housing demand. However there is a need for continued monitoring of this reform and information sharing between DHCS and community providers of housing and support, to ensure that priority allocations are made in a timely manner and that eligibility is assessed in a transparent fashion.

Recommendation: The impact of the removal of the cap on Priority allocations – as per the September 2011 *Public Housing Rental Assistance Program (Housing Needs Categories)* legislation - should be monitored closely by DHCS and by non-government agencies involved in social housing allocation and the provision of support to applicants for social housing.

1.2 Eligibility for High Needs housing and Priority housing

ACT Government and DHCS are commended for developing criteria designed to identify people with the greatest and most urgent need for housing. In general the criteria for “early allocation” of housing (both Priority and High Needs categories) are appropriate indicators of housing need. However there is a lack of clarity in how these criteria are assessed. This is particularly the case for subjective criteria such as the primary criteria for High Needs housing, namely “able to demonstrate ... existence of one or more of the risk factors identified for the Priority housing category but to a degree that does not justify admission to that category”. It is unclear how this criteria is interpreted by DHCS assessing officers.

Clearer processes for assessing such criteria are required, and may assist applicants to understand why they are assessed as eligible or ineligible for High Needs or Priority housing.

Recommendation: DHCS must communicate clearly, including with applicants and community providers of housing and support, how the criteria for “early allocation” (both Priority and High Needs categories) are assessed.

As the Housing Commissioner has acknowledged^{viii}, the social housing application process can be disempowering for applicants. Applicants may not, for example, understand why they do not qualify for Priority housing allocation, particularly if they understand themselves to meet several of the criteria for this category. Additionally applicants may not understand that they should frame their applications in terms of the Priority housing eligibility criteria. Moreover people assessed as eligible for High Needs and Priority housing may misinterpret what these classifications mean. Placement on the High Needs housing wait list appears, in everyday language, to reflect a very urgent need for housing. Thus those accepted on the High Needs wait list may assume they have been assessed as having the most urgent need for housing when this is in fact not the case. As a human services agency DHCS has a responsibility to communicate very clearly what these categories mean in practice to applicants and for their application processes. DHCS is commended for recognising the need to improve communication with applicants through the Gateway Quality Improvement project. In line with the ACT’s move toward a “joined up” response to housing need, non-government providers of social housing and support can play a valuable role in supporting DHCS to improve communication with applicants for social housing.

Recommendation: As a human services agency DHCS has a responsibility to ensure that applicants understand what their assessment as eligible for High Needs or Priority housing means in practice for their application.

The restrictive criteria for “early allocation” can produce unintended negative outcomes for applicants. For example ACT Shelter member organisations report that people eligible for High Needs and Priority housing have a reasonable expectation that they will lose their place on the list if they accept an offer of employment. Given that people must demonstrate “exceptional, urgent and critical need” for housing in order to be placed on the Priority waiting list, and that their need for housing is judged relative to others on the list, people may feel forced to choose between stabilising their housing or improving other aspects of their situation, for example by accepting employment. In this sense restrictive eligibility criteria, in particular for Priority allocation, can compound rather than resolve housing instability for some applicants. This situation is not in line with a rights-based approach or a human services approach to housing, and requires further joint monitoring and action by DHCS and community providers of housing and support.

Recommendation: Eligibility criteria and assessment processes for early allocation should be reviewed to ensure that applicants are not penalised for stabilising non-housing aspects of their situation.

ACT Shelter member organisations report that applicants who are referred by DHCS from the Social Housing Register to community housing providers fear that they will be removed from the early allocation waiting list if they reject the offer of a community housing vacancy, or if they are not accepted by a community housing provider as an appropriate tenant. This situation requires review and improved processes to ensure that applicants are not

penalised for rejecting or being rejected by a community housing provider, as is the right of applicants under the terms of the Social Housing Register's operation.

Recommendation: DHCS in partnership with non-government providers of housing and support should review the operation of the Social Housing Register, including to ensure that the policy, process and practice of referring applicants to community housing organisations operates effectively for applicants and for community housing providers.

1.3 Application process

The application process for social housing is frequently unclear for applicants and is often characterised by long delays and by lack of communication from DHCS about the status of applications. In particular it is unclear how the process from initial application to assessment by the Multi-Disciplinary Review Panel (MDP) is managed by DHCS. There can be a lag time of weeks to months between lodgement of an application for social housing, and review of eligibility for Priority allocation by the MDP. Once an application is assessed as eligible for Priority allocation by the MDP, DHCS aims to allocate housing within 90 days. However Priority applicants frequently spend far in excess of 90 days waiting for housing allocation, in part because DHCS cannot guarantee placement within this timeframe but also because most applicants will already have spent weeks to months waiting for the MDP to take place. There is therefore a need for DHCS to review and communicate processes for the efficient and timely management of applications, from initial lodgement through the MDP to housing allocation. ACT Shelter welcomes DHCS' commitment to improving these processes through the Gateway Services Improvement project.

Recommendation: DHCS should develop and share information about processes to ensure that applications move swiftly from initial lodgement to MDP assessment of eligibility for Priority allocation, and that this process is clearly communicated to applicants.

1.4 Multi-Disciplinary Review

Successful review by the Multi-Disciplinary Review Panel requires that applicants gather and present information to demonstrate their urgent and exceptional need for housing. In addition to being time-consuming and demanding for applicants, who may be in situations of crisis or vulnerability, MDP can require that applicants disclose traumatic experiences leading to their situation of housing insecurity. This can risk re-traumatising applicants. In line with the 'joined up'/'no wrong door' approach to housing insecurity now adopted in the ACT, all agencies responding to housing need should seek to avoid requiring people in housing crisis to tell and re-tell their stories in order to access assistance. Many applicants require intensive support from non-government agencies to prepare for MDP, and this suggests that the process functions under the assumption that applicants can access support. This demonstrates a need to improve the MDP process so that it is more accessible and simplified. Additionally, the significant backlog of applications that the MDP panels have had to work through suggests that MDP may not have been appropriately resourced to meet very high and legitimate demand. The MDP's role should be one of swift approval of applications for Priority status.

Recommendation: The MDP process should be reviewed to ensure it is adequately resourced to meet demand and respond appropriately to people in crisis; and that the process be simplified in order to avoid unnecessary stress for applicants and to ensure swift approval of Priority status.

1.5 Reassessing housing need in light of changed circumstances

As a human services agency DHCS has a responsibility to proactively identify when people are seeking to have their applications for housing need category reviewed, and to identify when a review of applicant circumstances is appropriate although not requested by the applicant. It is appropriate and frequently necessary for DHCS officers to assist applicants to submit requests for review of their housing need status, either in writing or verbally if this is the applicant's preference.

Recommendation: DHCS officers must assist applicants to apply for re-assessment of their housing need category, either in writing or verbally as appropriate to applicants' situation and preference, and should seek to identify when re-assessment is required although not requested.

1.6 Communicating with applicants

In light of the above recommendations, ACT Shelter welcomes DHCS's commitment to improving the social housing application process through the Gateway Quality Improvement project and a range of recent reforms including the Social Housing Register, First Point and the Common Access Gateway.

While DHCS does not position public housing as a crisis response to housing need, applicants for Priority and High Needs housing are frequently experiencing housing affordability crisis, homelessness or risk of homelessness. It is therefore appropriate that DHCS continue to improve the way its officers and processes respond to people in housing crisis. Improved communication with applicants is critically important in the context of this transition to a human services approach. Applicants for social housing appreciate "knowing who to talk to" about the status of their application. It can be frustrating for applicants if they are not informed of staff changes that relate to their applications, if they receive contrary advice from different responding offers, and if they do not understand the status of their application. One specific strategy to reduce applicants' frustration is to more effectively communicate with applicants about the services offered DHCS Housing Outreach workers. The service these officers provide is valued highly by applicants.

In transitioning to a human services approach there may be a need both for further training and development for DHCS officers especially those responding to applicant queries and those dealing with applications.

Recommendation: Applicants should be advised if their liaison officer at DHCS changes, and advised of the name and contact of the replacing officer.

Recommendation: DHCS should develop an engagement strategy to better communicate the services offered by DHCS Housing Outreach officers.

Recommendation: Ongoing training and development opportunities for DHCS staff should address issues emerging from the transition to a human services approach. Non-government providers of housing and support services can provide expertise in this area.

Recommendation: Gateway reforms should be monitored by DHCS in consultation with social housing tenants and non-government providers of social housing and support services.

1.7 Gathering and sharing waiting list data

DHCS is commended for its provision of regularly updated information about the numbers of people waiting for housing allocation. It would be useful to gather and share more detailed information about the characteristics of people across the Priority, High Needs and Standard housing need categories. This could include a breakdown of applicants by gender, age and housing need criteria, and numbers of applications for re-assessment of housing need category requested and approved. Gathering and sharing this information will provide DHCS and its partners with a clearer understanding of the situation of people housed and waiting to be housed. This will assist with program and planning to ensure that needs for safe, affordable and accessible social housing are met.

Recommendation: Documenting and sharing more detailed information about the characteristics of people waiting for social housing will assist with planning appropriate responses to need.

2. Innovative responses to lack of social housing

2.1 Responding to undersupply

The challenges of managing demand for social housing emerge in the context of an undersupply of social and affordable housing in ACT. A number of recent policy reforms and program innovations in affordable housing and homelessness in the ACT are designed to respond to this situation and to ameliorate the impact of an unaffordable housing system on low to moderate income earners. Ongoing commitment to implementing these reforms successfully will assist in reducing pressures on the social housing system.

In this context the ACT Government's commitment to the construction of new public housing stock is necessary and welcome. Current high demand for social housing is in part a result of longstanding underinvestment in social housing, and sustained and significant investment in new social housing stock is required to respond to this situation.

Pressure on the ACT social housing system also reflects wider housing market failures that have led to a rapid increase in housing costs relative to incomes across all income categories but particularly for low income earners. The range of measures outlined in the ACT Affordable Housing Strategy will assist to reduce housing stress in the ACT. Over time these reforms will take some pressure off the limited appropriate and affordable housing options currently available for low to moderate income earners. Reforms introduced under the Strategy provide options for home purchase including through innovative shared equity models, and expand the supply of rental properties available at 74.9 per cent of market rent. While these are valuable reforms that will have an impact on the overall affordability of housing in the ACT, for many on low incomes these options are neither affordable nor accessible.

Given the high demand for social housing from people who meet the income criteria for social housing (but who cannot be accommodated due to high demand), there is a demonstrated need to develop and implement strategies to meet the needs of this segment of the population. This should involve further expansion of social housing that is accessible and affordable for people who meet the income criteria for social housing, as well as other housing options including rental, that are appropriate to people on low incomes and vulnerable to housing stress but who do not meet ACT Housing eligibility criteria.

Recommendation: Further review of the regulatory framework governing the operation of community housing providers in the ACT should occur, with a view to encouraging 'best

practice' community housing provision and growth in this sector in line with commitments in the ACT Affordable Housing Action Plan.

Recommendation: Incentives to encourage private/community housing partnerships should be investigated and considered.

Recommendation: Continued development of targeted and appropriate social housing for people with specific needs for housing and/or support services is necessary. While the following cohorts have specific needs that might be best accommodated by specialist social housing models, their needs should also be met by generalist social and affordable housing providers including by the application of accessible design principles. These groups include:

- older ACT residents on low incomes;
- people exiting primary homelessness;
- people with disabilities;
- Indigenous people;
- migrants and refugees;
- women and children leaving situations of domestic violence;
- young people; and
- people exiting institutions.

2.2 Vacancies between social housing tenancies

It is ACT Shelter's view that the social housing waiting list can only be adequately addressed through the medium to longer term reforms to housing policy outlined above. However, in the interim, it may be appropriate to review the average time that social housing properties are vacant between tenancies.

Reducing the average time that social housing properties are vacant between tenancies can have significant impacts on the length of time that people wait to access social housing. This would also minimise community perceptions of inadequate management of stock. The average occupancy rate of public housing dwellings in ACT public housing was 100% between 2006 and 2010^{viii} with an average turnaround time between tenancies in public housing of more than 30 days between 2005 and 2010.^{ix} The Community Services Directorate 2010-2011 Annual Report states that 79 per cent of routinely vacant properties were re-let within 28 days^x. This may be an area where a review of existing policy and practice could be undertaken with a view to developing commitments, for example to reducing the average time that dwellings are vacant between tenancies. This would have greatest impact at medium to higher density multi-unit social housing sites, where there is a swifter movement of tenants in and out of dwellings. Average turn-around times will vary considerably between different dwelling and tenant cohorts.

Recommendation: Appropriateness of targets for average turnaround times between social housing tenancies should be reviewed, to ensure dwellings are made available to new tenants as swiftly as possible.

2.3 Managing the Social Housing Registry

A review of the operation of the Social Housing Registry may identify areas where referrals to community housing providers could be more efficiently undertaken, reducing the number of inappropriate referrals. This should be undertaken as part of a wider assessment of the operation of the Registry, its successes in its first year of operation and identification of challenges for applicants and providers of social housing.

Recommendation: A full review of the operation of the Social Housing Registry should be undertaken, including to identify areas where the referral process could be improved.

Summary

This submission has identified a number of areas for improvement in the ACT social housing system. This has included proposing changes to the way that applications for social housing are managed including through the Social Housing Register, DHCS Gateway and Assessment processes, and assessing eligibility for High Needs and Priority housing. The ACT Ombudsman's *Assessment of an Application for Priority Housing* has identified the need for DHCS to improve both its processes, and its communication with and responsiveness to applicants for social housing. ACT Shelter anticipates working in partnership with our members and with DHCS to improve the response to housing need in the ACT.

However, the need to manage very high demand for social housing is produced by a lack of affordable housing options in the ACT. Specifically, very high levels of unmet demand for social housing in the ACT is a result of the undersupply of social housing and by the lack of other housing options including rental and purchase that are genuinely affordable for people on low to moderate incomes in the ACT. Continued and renewed commitment is required from the Legislative Assembly, across Government departments and from non-government providers of housing and support services to address the inadequate supply of social housing, and to continue reforms to the housing system in the ACT so that options available to low to moderate income earners are significantly improved. A summary of key recommendations is provided below.

Summary of recommendations

In this context, ACT Shelter on behalf of its members makes the following recommendations for further reform:

1. Responding to social housing need

- The impact of the removal of the cap on Priority allocations – as per the September 2011 *Public Housing Rental Assistance Program (Housing Needs Categories)* legislation - should be monitored closely by DHCS and by non-government agencies involved in social housing allocation and the provision of support to applicants for social housing.
- DHCS must communicate clearly, including with applicants and community providers of housing and support, how the criteria for “early allocation” (both Priority and High Needs categories) are assessed.
- As a human services agency DHCS has a responsibility to ensure that applicants understand what their assessment as eligible for High Needs or Priority housing means in practice for their application.
- Eligibility criteria and assessment processes for early allocation should be reviewed to ensure that applicants are not penalised for stabilising non-housing aspects of their situation.
- DHCS in partnership with non-government providers of housing and support should review the operation of the Social Housing Register, including to ensure that the policy, process and practice of referring applicants to community housing organisations operates effectively for applicants and for community housing providers.

- DHCS should develop and share information about processes to ensure that applications move swiftly from initial lodgment to MDP assessment of eligibility for Priority allocation, and that this process is clearly communicated to applicants.
- The MDP process should be reviewed to ensure it is adequately resourced to meet demand and respond appropriately to people in crisis; and that the process be simplified in order to avoid unnecessary stress for applicants and to ensure swift approval of Priority status. DHCS officers must assist applicants to apply for re-assessment of their housing need category, either in writing or verbally as appropriate to applicants' situation and preference, and DHCS officers should seek to identify when re-assessment is required although not requested.
- Applicants should be advised if their liaison officer at DHCS changes, and advised of the name and contact details of the replacing officer.
- DHCS should develop an engagement strategy to better communicate the services offered by DHCS Housing Outreach officers.
- Ongoing training and development opportunities for DHCS staff should address issues emerging from the transition to a human services approach. Non-government providers of housing and support services can provide expertise in this area.
- Gateway reforms should be monitored by DHCS in consultation with social housing tenants and non-government providers of social housing and support services.
- Documenting and sharing more detailed information about the characteristics of people waiting for social housing will assist with planning appropriate responses to housing need.

2. Innovative responses to lack of social housing

- Further review of the regulatory framework governing the operation of community housing providers in the ACT should occur, with a view to encouraging 'best practice' community housing provision and growth in this sector in line with commitments in the ACT Affordable Housing Action Plan.
- Incentives to encourage private/community housing partnerships should be investigated and considered.
- Continued development of targeted and appropriate social housing for people with specific needs for housing and/or support services is necessary, including for older people on low incomes; people exiting primary homelessness; people with disabilities; Indigenous people; migrants and refugees; women and children leaving situations of domestic violence; young people and people exiting institutions.
- Enhanced social housing stock management should involve better integration of affordable and social housing planning into wider ACT planning processes, a commitment to match dwelling types to demographic changes, and to target the release of land for public and community housing in ways that ensure the needs of specific groups of people are matched to housing location and type.
- Appropriateness of targets for average turnaround times between social housing tenancies should be reviewed, to ensure dwellings are made available to new tenants as swiftly as possible.
- A full review of the operation of the Social Housing Registry should be undertaken, including identifying areas where the referral process could be improved and down time between tenancies reduced.

ⁱ ACT Government *Affordable Housing Action Plan* 2007 p4

ⁱⁱ National Shelter *Housing Australia Factsheet* August 2011 p3

ⁱⁱⁱ National Shelter *Housing Australia* p3

^{iv} National Shelter *Housing Australia* p4

^v ACT Affordable Housing Action Plan p15

^{vi} Susan Andrews. *The Gap: Exit Points from Homelessness Services in the ACT*. ACT Shelter 2009 pp 17-19

^{vii} ACT Ombudsman Alan Asher *Housing ACT - Assessment of an Application for Priority Housing*. Report No 01/2011, June 2011 p20

^{viii} Productivity Commission Report on Government Services *Housing* June 2011 p16.27.

^{ix} Report on Government Services 2011 p16.29.

^x ACT Community Services Directorate *Annual Report 2010-2011* p108.