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Submission Cover Sheet

Inquiry into Specialist Disability Accommodation service delivery through Housing ACT

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ACT
Shelter

Working together for housing justice

ACT Shelter submission to the Standing
Committee on Public Accounts and
Administration

Inquiry into Specialist Disability Accommodation Service Delivery through Housing ACT

April 2026

ACT Shelter acknowledges Ngunnawal, Ngambri and Ngarigo people as traditional custodians of the land of the ACT and region. We pay respect to their Elders, past and present, and recognise their strength, resilience and enduring connection to this land, to culture, to community and to Country.

ACT Shelter is the peak body for housing justice in the ACT. We are an independent, not-for-profit organisation providing evidence-based advocacy and strategic advice on systemic housing issues. We work to address inequality in the housing system and to ensure that people on low, moderate and no incomes can access homes that are affordable, safe and secure. At the core of our work is a commitment to the realisation of the right to adequate housing for all Canberrans.

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About ACT Shelter

ACT Shelter is the ACT's peak body for housing justice. We advocate for access to safe, secure, affordable and appropriate housing for all Canberrans, with a particular focus on the needs of people on low, no and moderate incomes. We are committed to growing and improving the quality of public housing in the ACT, and to ensuring that people who are marginalised in the housing market – including people with disability – have access to housing that meets their needs. Housing justice, for ACT Shelter, means more than a roof overhead: it means the right to a home that is adequate, accessible, affordable and secure.

This submission is made in response to the Standing Committee on Public Accounts and Administration's Inquiry into Specialist Disability Accommodation (SDA) service delivery through Housing ACT. We welcome this inquiry and the opportunity to speak to the systemic issues it has surfaced. While we address the specific terms of reference, our submission is grounded in our understanding of the deeper structural factors that have contributed to the circumstances this inquiry is examining.

Executive summary

The failures of Specialist Disability Accommodation (SDA) service delivery through Housing ACT are not isolated administrative shortcomings. They are the tangible manifestation of deep structural problems: decades of underinvestment in public housing, an asset management model oriented toward reactive rather than planned maintenance, inadequate data systems, poor communication with tenants, and a governance framework that constrains Housing ACT's capacity to invest and plan for the long term.

People with disability make up a significant proportion of public housing tenants and often face some of the greatest barriers to accessing appropriate, affordable and accessible housing. They have a fundamental human right – recognised in the United Nations *Convention on the Rights of Persons with Disabilities* and now enshrined in ACT legislation – to accessible, affordable and appropriate housing.¹ Housing ACT, as their landlord, bears a legal obligation to provide reasonable adjustments under the *Disability Discrimination Act 1992 (Cth)* and the *Discrimination Act 1991 (ACT)*, and to ensure tenancies are maintained to the standard required under the *Residential Tenancies Act 1997 (ACT)*. These obligations are currently not being consistently met.

The ACT Ombudsman's March 2026 report, *Falling through the gaps*, found a pattern of unreasonable delays, poor communication, inadequate recordkeeping and absent quality assurance frameworks in Housing ACT's management of tenant maintenance and repair

¹ United Nations, (2006), [Convention on the Rights of Persons with Disabilities](#), 2515 UNTS 3, 13 December 2006.

requests.² These findings equally apply to disability modifications and accessibility upgrades – works that are not merely a matter of comfort, but of dignity, safety and rights.

Our submission urges the Committee to recognise that operational and administrative reforms, while necessary, are insufficient on their own. The fundamental challenge is one of political will and investment. Public housing must be reconceived and funded as critical social infrastructure. Until that shift occurs, tenants with disability will continue to live in homes that do not meet their needs – and the ACT Government will continue to fall short of its human rights obligations.

1. Housing as a human right

In September 2025, the ACT Legislative Assembly passed landmark legislation recognising housing as a human right in the ACT, to take effect from 2027. This places the ACT at the forefront of Australian jurisdictions in its commitment to housing as a fundamental right. It also places a heightened obligation on Housing ACT, as the Territory's largest landlord and primary provider of housing to Canberrans facing the greatest barriers in the housing system, to ensure its practices and systems are consistent with this commitment.

The United Nations *Convention on the Rights of Persons with Disabilities* (CRPD), to which Australia is a signatory, is explicit: people with disability are entitled to access adequate, affordable housing on an equal basis with others. This includes the right to have housing modified or adapted to meet their needs. The *Disability Discrimination Act 1992 (Cth)* and the *Discrimination Act 1991 (ACT)* operationalises this at a domestic level, requiring Housing ACT as a landlord to make reasonable adjustments to avoid discrimination on the basis of disability. Since April 2025, ACT legislation has placed a positive duty on ACT Government agencies to eliminate discrimination for all protected attributes, including disability.³ Failure to do so constitutes unlawful discrimination.

These legal obligations provide the normative framework within which this inquiry must be understood. The question before the Committee is not simply whether Housing ACT has administered an NDIS funding stream competently. It is whether the ACT Government, through Housing ACT, is meeting its obligations to tenants most impacted by systemic gaps in accessible and appropriate housing – and if not, what structural changes are required to ensure that it does.

2. Public housing and disability

Public housing plays a unique and irreplaceable role for many people with disability. In Canberra, as elsewhere, the private rental market does not reliably deliver housing that is affordable, accessible or appropriate for people with disability and on low incomes. Compared

² ACT Ombudsman, (2026), [Falling through the gaps: How Housing ACT manages tenant requests for repairs to their homes](#), Canberra.

³ [Discrimination Act 1991 \(ACT\)](#), s74 and s75.

with non-disabled peers, people with disability are more likely to experience housing stress and homelessness, and less likely to own their home.⁴ They are also more likely to live in low-income households, rely on income support, and experience financial stress.^{5,6,7} This structural disadvantage creates a reinforcing cycle where inadequate housing contributes to poor health and reduced economic participation, while limited incomes and higher disability-related costs make it nearly impossible to secure appropriate accommodation in the private market.^{6,7} Consequently, for people with disability – who may require accessible housing features that are scarce in the private market – public housing is not a preference. It is a necessity.

The data on this point is stark. People with disability are eight times more likely to live in public housing than people without disability, five times more likely to access specialist homelessness services, and three times more likely to receive Commonwealth Rent Assistance.⁸ Estimates suggest that between 39% and 71% of public housing households in Australia include at least one person with a disability – a concentration far exceeding any other housing sector (including community housing).⁹ In the ACT, this proportion is likely to be similar or higher, given the increasingly residualised or targeted nature of the tenant base.

For these tenants, the quality, accessibility and responsiveness of public housing management is not merely a service delivery question, but is a determinant of health, wellbeing, independence and dignity.¹⁰ Living in housing that does not meet one's accessibility needs, or waiting years for modifications that should have been made years earlier, has profound and cumulative consequences. It limits mobility, independence and participation. It causes physical harm, psychological distress and social isolation. It undermines the very outcomes that the NDIS and disability support services are trying to achieve.

Yet much of the ACT's public housing stock is ageing, in disrepair, and in many cases wholly inaccessible or inappropriate for tenants with disability. Properties built in the 1950s through 1970s were not designed to meet contemporary accessibility standards. Retrofitting these properties is often complex and costly, particularly in the absence of planned, lifecycle-based asset management. As a result, many tenants report living in unsuitable housing for extended periods, unable to obtain the modifications or transfers they need. This is not an accident – it is the predictable result of structural underinvestment and systemic failures that this submission examines.

⁴ Centre of Research Excellence in Disability and Health (CRE-DH), (2024). [Factsheet: Housing and income of adults with disability in Australia](#).

⁵ (CRE-DH), (2024). [Factsheet](#).

⁶ Sully, A, Aitken, Z, Bailie, J, & Bishop, GM, (2025), [Trends in disability-related inequalities in housing affordability in Australia, 2003 to 2022](#), *Health & Place*, 95, 103523.

⁷ Mason, K, Durrand, T, Bishop, GM, Sully, A, & Aitken, Z, (2026), [Housing affordability and health in people with disability: a scoping review](#), *Epidemiologic Reviews* 48(1), mxag004.

⁸ Aitken, Z, Fortune, N, Krnjacki, L, Badji, S, Disney, G, & Kavanagh, A, (2021), [Identification of People with Disability in Linked Administrative Data for service use and outcomes reporting in housing: Summary of NDDA Pilot findings](#). National Disability Data Asset (NDDA).

⁹ Aitken et al, (2021), [Identification of People with Disability in Linked Administrative Data](#).

¹⁰ Mason et al., (2026), [Housing affordability and health in people with disability: a scoping review](#).

3. The structural context: why Housing ACT is failing tenants with disability

3.1. Decades of underinvestment in public housing

The failings exposed by this inquiry cannot be understood in isolation from the broader context of public housing in the ACT. Public housing has contracted significantly as a share of total housing stock, falling to 5.48% as of June 2025, down from around 13% at self-government, and representing a dramatic decline since the early 1970s, where public housing comprised the majority of residential housing in the ACT.^{11,12} According to the most recent report from the National Housing and Supply Council, over the past decade the ACT has experienced one of the steepest declines in social housing as a share of housing stock.¹³

In addition to public housing declining as a share of all housing, there has been sustained underinvestment in its upkeep and maintenance. At the same time, the portfolio has aged, with a large proportion of dwellings now well beyond their original design life.

The consequence is a measurable and ongoing decline in stock condition. Productivity Commission data shows the proportion of dwellings meeting acceptable standards has fallen from 81% in 2016 to 71% in 2025, with a substantial share of households reporting multiple structural issues and inadequate facilities.¹⁴ This is not an inevitable outcome of ageing assets, but is the predictable result of chronic underinvestment by successive governments.

Chronic underinvestment in planned maintenance has fundamentally unbalanced the system. Planned, cyclical maintenance – replacing roofs, kitchens and plumbing systems before they fail – has been chronically underfunded and systematically deferred in favour of reactive, crisis-driven repairs.

The dynamics of this model are well understood.^{15,16,17} Deferred maintenance does not remove costs; it compounds them. Minor issues escalate into major failures, driving up repair costs, extending vacancy periods, and, in some cases, requiring tenant relocation. Expenditure becomes volatile and difficult to forecast, as emergency works crowd out planned investment. Over time, overall portfolio quality declines, further increasing demand for reactive repairs and

¹¹ AIHW, *Housing assistance in Australia*; ABC, *Total value of dwellings*.

¹² Gilbert, T, (2018), *Public Housing in the Canberra: The Pride and the Prejudice – A Public Policy Literature Classic?*, *Parity magazine*, Vol. 31, No. 9.

¹³ National Housing Supply and Affordability Council, (2025), [State of the Housing System 2025](#), p 58.

¹⁴ Steering Committee for the Review of Government Service Provision (SCRGSP) 2026, [Report on Government Services 2026, Part G: Housing and homelessness](#), Productivity Commission, Canberra.

¹⁵ Sharam, A, McNelis, S, Cho, H, Logan, C, Burke, T, and Rossini, P, (2021), [Towards an Australian social housing best practice asset management framework](#), AHURI Final Report No. 367a, Australian Housing and Urban Research Institute Limited, Melbourne, doi: 10.18408/ahuri5324001.

¹⁶ Sharam, A, (2025), [Introducing social housing Asset Management as a comprehensive system](#), *Housing Studies*, 40(2), 418-443.

¹⁷ Marshall, M, (2025), [Maintenance devalued: the role of financialisation and assetisation in producing pathways to disrepair](#), *International Journal of Housing Policy*, 1-21.

accelerating asset deterioration. The result is a vicious cycle: deferred maintenance leads to asset deterioration, which leads to higher emergency repair costs, which crowds out planned maintenance, which accelerates further deterioration.

Research has shown that every dollar deferred in preventive maintenance generates four to five dollars in future reactive costs. Yet despite this established evidence base, ACT public housing data from the 2025 Estimates Committee hearings reveal that 77.8% of outstanding maintenance work orders are reactive repairs, with planned maintenance accounting for only 15.2%.¹⁸ This is not a sustainable or efficient approach to managing an asset base valued at approximately \$8 billion.

The result is a system that is persistently catching up rather than keeping pace: more costly to run, harder to manage, and increasingly unable to deliver safe, functional housing. For tenants with disability, the consequences are particularly acute, as delays and failures in maintenance directly translate into barriers to accessibility, independence and wellbeing.

3.2. Residualisation and the mismatch between needs and resources

As public housing has contracted, it has become increasingly targeted to those with the highest and most complex needs. This process of 'residualisation' has occurred without the matching increase in resources, staffing and systems capacity that it demands. The tenant population now includes very high concentrations of people with disability, chronic health conditions, trauma histories, and intersecting disadvantage. Their housing needs are correspondingly complex and intensive.

The funding model that underlies Housing ACT's operations does not reflect this reality. Tenant rents are capped at a proportion of income – appropriately so – but this means revenue is minimal. Commonwealth funding covers only a fraction of actual costs. The structural deficit is compounded by Housing ACT's constitution as a public trading enterprise, which creates commercial imperatives that sit in fundamental tension with its social mission, constraining long-term investment and encouraging cost-minimisation over quality of service.

3.3. A reactive, fragmented repairs and maintenance system

The ACT Ombudsman's March 2026 report, *Falling through the gaps*, provides a detailed and damning account of how Housing ACT manages tenant repair and maintenance requests. The Ombudsman found systematic failures across four domains: timeliness, communication, complaint resolution, and quality assurance and recordkeeping. Tenants waited months and sometimes more than a year for repairs that Housing ACT was legally required to complete within four weeks. Poor communication left tenants without updates for extended periods. Complaints were not properly recorded, escalated or resolved. And Housing ACT had no system capable of tracking whether its legislative obligations were actually being met.

¹⁸ ACT Legislative Assembly, (2025), [Question on notice No. 338 regarding public housing and condition, repairs and maintenance, \[QON No. 228\]](#), Inquiry into Appropriation Bill 2025–2026 and Appropriation (Office of the Legislative Assembly) Bill 2025–2026.

These findings are directly relevant to this inquiry. The same systemic failures that produced a tenant waiting fifteen months for a leaking ceiling to be repaired are the failures that produce tenants with disability waiting years for accessibility modifications. The same inadequate recordkeeping that obscures Housing ACT's repair performance obscures the extent of unmet demand for disability modifications. The same reactive, fragmented maintenance model that fails tenants generally fails tenants with disability with particular severity – because for a person with mobility impairment or other disability, a broken ramp, an inaccessible bathroom or an unmodified kitchen is not merely inconvenient. It is a barrier to independence, safety and dignity.

3.4. Siloed governance and fragmented accountability

A further structural complication arises from the recent Machinery of Government changes that transferred responsibility for managing the public housing maintenance contract with Programmed Facilities Management from Housing ACT to Infrastructure Canberra. While Housing ACT retains the landlord obligations under the *Residential Tenancies Act 1997* (ACT), responsibility for delivering repairs and maintenance now sits with a separate agency. This creates a structural accountability gap – the entity legally responsible for maintenance outcomes does not directly control the systems and resources required to deliver them.

The Ombudsman's report explicitly identifies this as a risk and calls on Housing ACT to work with all entities involved to ensure citizen-centric service delivery, regardless of internal agency boundaries. ACT Shelter endorses this recommendation and urges the Committee to consider how governance arrangements can be strengthened to ensure clear, undivided accountability for tenant outcomes – particularly for tenants with disability whose needs require coordinated, sustained attention.

3.5. The lack of a coordinated, whole-of-government disability housing strategy

The systemic issues identified in this Inquiry are compounded by the absence of a coherent, cross-government approach to disability housing in the ACT. While existing frameworks (such as the ACT Housing Strategy 2018-2028 and the ACT Disability Strategy 2024-2033) provide important overarching directions, neither offers the level of specificity, integration, or operational focus required to address the distinct and complex housing needs of people with disability.

This gap is consequential. Housing for people with disability sits at the intersection of multiple systems – housing, health, disability services, planning, and infrastructure – yet responsibility is fragmented across agencies, funding streams, and levels of government. Without a unifying strategy, policy settings remain siloed, service responses are inconsistent, and accountability for outcomes is diffuse. The result is a system that is difficult to navigate, slow to respond, and too often unable to deliver appropriate housing outcomes.

ACT Shelter supports the recommendations for a Disability Housing Taskforce and Disability Housing Strategy put forward by National Disability Services (NDS) in relation to this Inquiry. The establishment of a Disability Housing Taskforce would serve to guide the development of a dedicated strategy and action plan. Such a Taskforce – comprising people with disability,

Disabled Persons Organisations, specialist disability housing providers, Disability Support Providers, Community Housing Providers, and relevant peak bodies – would provide the cross-sector expertise and lived experience necessary to drive meaningful, coordinated reform. It could also play a critical role in reviewing and considering the policy approaches required to ensure Specialist Disability Accommodation in the ACT, potentially including dwellings owned by the ACT Government, is fully utilised, fit-for-purpose, and aligned with contemporary participant needs.

Emerging out of this, a dedicated Disability Housing Strategy, accompanied by a clear implementation plan would provide a structured, evidence-based framework to identify current and future need, address gaps in supply, and coordinate investment across the housing system and related service systems. While such a strategy must encompass the full housing system, public housing would necessarily be a central pillar. The disproportionate representation of people with disability within public housing, combined with its role as the primary provider of deeply subsidised and secure housing, means that meaningful progress on disability housing outcomes will depend on reform and investment within this sector.

4. SDA registration and the limits of institutional capacity

Against this structural backdrop, the circumstances around the registration and subsequent lapse of Housing ACT's registration as an SDA program member can be more readily understood. SDA is a complex, administratively demanding program. Effective participation requires dedicated capability in areas including NDIS processes and funding rules, property assessment and certification, data management and reporting, and ongoing compliance and governance.

Housing ACT, operating within a constrained funding envelope, managing an ageing and deteriorating asset base, and constituted in a way that limits long-term capital investment, did not have – and was not resourced to develop – the institutional capability to operationalise SDA effectively. The lapse of registration is therefore not primarily a story of administrative failure by individual officers. It is a story of an organisation being asked to implement a complex new program without the foundational systems, data, governance frameworks or financial capacity to do so.

This matters for how the Committee frames its recommendations. Recommendations directed at improving SDA administration within Housing ACT's current structure and resourcing will have limited effect if the underlying structural deficits are not addressed. The ACT Government must decide whether it is genuinely committed to Housing ACT playing a meaningful role in SDA – and if so, it must resource and support that role appropriately.

We note that SDA funding from the NDIS, where accessed, would have represented an important potential revenue stream to support the costs of making public housing genuinely accessible. The apparent failure to maximise the use of available SDA funding – whether due to registration lapses, inadequate systems, or poor processes – means that tenants with disability

have missed out on supports to which they were entitled, and that public housing assets have not been upgraded in ways that SDA funding was designed to support. This is a significant policy failure with real consequences for real people.

5. Disability modifications, delays and the denial of rights

5.1. The legal obligation

Under the *Disability Discrimination Act 1992 (Cth)* and the *Discrimination Act 1991 (ACT)*, Housing ACT has a legal obligation to provide reasonable adjustments to avoid discrimination on the basis of disability. ACT legislation further places a positive duty on ACT Government agencies to eliminate discrimination for all protected attributes, including disability. For tenants in public housing, this includes modifications to the dwelling required to enable them to safely access and live in their home. A failure to provide reasonable adjustments constitutes unlawful indirect discrimination under section 6 of the DDA.

The scope of these obligations, and the processes by which they are assessed and fulfilled, must be clear, accessible and consistently applied. At present, there is evidence that neither the legal obligations nor the processes are well understood or consistently implemented within Housing ACT's systems. The extent of Housing ACT's legal obligation to provide reasonable adjustments needs to be clarified, communicated and operationalised as a matter of priority.

5.2. Protracted delays and their consequences

ACT Shelter has significant concerns about the extent to which tenants with disability have experienced delays – sometimes of years – in the assessment, approval and completion of housing modifications. These are not abstract bureaucratic delays. They have direct, material consequences for tenants' lives.

A person waiting for grab rails, ramp access or bathroom modifications may be unable to leave their home safely, shower independently, or move freely through their own living space. They may be at elevated risk of falls, injuries and hospitalisations. They may be unable to participate in work, social activities or community life. They may depend on carers or family members for assistance that the appropriate home modification would have made unnecessary. The cumulative harm of these delays is substantial, and it falls on people who are already among the most disadvantaged members of the community.

Poor communication compounds the harm. When Housing ACT fails to confirm receipt of modification requests, provide timely updates on progress, or notify tenants of decisions that affect them – including decisions that may be appealable – tenants are denied the opportunity to advocate for themselves, provide additional information or challenge flawed decisions. The result is anxiety, uncertainty and loss of agency, on top of the physical and practical difficulties of living in inaccessible housing.

5.3. Recordkeeping and data failures

ACT Shelter is concerned that Housing ACT does not currently collect timely, standardised, comprehensive data on disability modification requests. Without this data, it is impossible to understand the true scale of unmet demand, track outcomes for tenants who have requested modifications, identify systemic patterns of delay or denial, or report transparently on performance against legal obligations.

The *Territory Records Act 2002 (ACT)* requires government agencies to make and keep full and accurate records of their activities.¹⁹ Government responses to questions on notice in the 2025 Estimates process acknowledged that there is no single system providing a real-time count of outstanding maintenance, repair or accessibility upgrade requests.²⁰ This is a fundamental governance failure. Without accurate data, Housing ACT cannot manage what it cannot measure – and tenants with disability pay the price.

Beyond individual requests, there is also a critical gap in comprehensive, up-to-date data on the condition of the public housing asset base itself. Effective asset management depends on a clear and current understanding of property condition, maintenance history, accessibility features, and projected renewal needs. Without this, Housing ACT is unable to plan systematically, prioritise investment, or transition from an overwhelmingly reactive maintenance model to a more efficient, planned approach. Improved data capture and analysis would enable condition-based maintenance, reduce reliance on costly emergency repairs, identify inefficiencies or unnecessary works, and support more credible long-term financial planning. It would also strengthen accountability and transparency, providing government and the community with a clear picture of the scale of investment required to maintain safe, accessible and fit-for-purpose housing.

ACT Shelter strongly supports the Ombudsman's recommendation that Housing ACT establish frameworks to monitor, measure and report on performance for managing maintenance requests, and urge the Committee to extend this recommendation explicitly to disability modifications and accessibility upgrades.

5.4. Tenant-centred service delivery

The system for repairs, maintenance and modifications should place the tenant at the centre. This is not merely a matter of good customer service. It is a matter of rights, dignity and legal obligation. Tenants should be able to report issues through accessible channels, receive timely and transparent updates, understand the decisions made about their requests and their right to appeal, and have confidence that their concerns will be taken seriously and acted upon.

At present, the evidence suggests that Housing ACT's systems fall significantly short of this standard. The Ombudsman's report documents cases where tenants were not told about decisions affecting them, where complaints were not recorded or escalated, where contractors'

¹⁹ *Territory Records Act 2002 (ACT)*, s 14.

²⁰ ACT Legislative Assembly, (2025), [Question on notice No. 013 regarding public housing maintenance](#), [QON No. 013], Inquiry into annual and financial reports 2024-25, ACT Legislative Assembly.

accounts were accepted over tenants' without adequate inquiry, and where vulnerable tenants faced months of uncertainty because nobody was accountable for following a matter through to resolution. For tenants with disability, this experience can be particularly harmful – and inconsistent with Housing ACT's obligations.

6. The transition to insourcing

The ACT Government's decision to transition public housing repairs, maintenance and modifications from a contracted model to an in-house service, scheduled for full implementation by 2028, represents a significant opportunity. ACT Shelter supports this transition in principle. However, it must not be approached as a narrow procurement or workforce exercise. If treated as simply a change in the provider model, the underlying problems that have been identified in the repairs and maintenance system will likely persist.

The transition to insourcing provides a unique and time-limited opportunity to fundamentally redesign the systems, processes and culture that govern the management of public housing maintenance. The problems identified by the Ombudsman – and the deeper structural issues identified in this submission – will not be resolved simply by bringing maintenance in-house. What is required is a deliberate effort to build a new model of service delivery that is tenant-centred, data-informed, proactively managed and genuinely accountable.

ACT Shelter is concerned that, to date, there has been limited (if any) engagement between the Government's Insourcing Taskforce and community stakeholders, including people with disability and public housing tenants. We therefore recommend that the ACT Government establish a dedicated advisory group to support the insourcing transition. This group should include public housing tenants (including tenants with disability), community housing providers, specialist service providers, and relevant peak bodies. Such a mechanism would explore ways to strengthen processes and systems to ensure the new model is designed around the needs of tenants, while also supporting implementation through real-time feedback on emerging issues, risks and any unintended consequences during the transition.

Moving to a tenant-centred, integrated service model will require, at minimum:

- **Integrated asset and tenancy management**, with maintenance functions closely aligned with tenancy management to enable a holistic understanding of tenant needs and property conditions.
- **Improved tenant interface**, enabling tenants to easily report, track, and manage repair requests through accessible channels. This should include digital platforms –similar to those used in other jurisdictions – that allow tenants to log requests, upload photos, and receive real-time updates. Importantly, non-digital pathways must remain available and effective.
- **Real-time visibility and communication**, so that both tenants and staff have access to up-to-date information on the status of maintenance requests, expected timeframes, and any delays. This is critical to rebuilding trust and ensuring accountability.

- **Clear escalation pathways** to support tenant access to simple, well-publicised processes to escalate unresolved issues, particularly where delays affect safety, accessibility, or habitability.
- **Specialist capability and dedicated processes for assessing and completing disability modifications**, with clear timeframes, communication standards and escalation pathways.
- **Regular, transparent public reporting on maintenance and modification performance**, including against legal obligations, and with aggregated data on property condition, maintenance backlogs, timeliness of repairs, and outstanding requests, including disability modifications.
- **Clear accountability frameworks** that ensure responsibility for tenant outcomes cannot be diffused across agencies or lost in the gap between Housing ACT and Infrastructure Canberra.

In the transition to insourcing, consideration must also be given to the diverse contractual arrangements between Housing ACT and community housing providers and other service organisations. These arrangements range from tenancy management to property leasing and specialised support services, with differing legal obligations and responsibilities, and this in turn creates variability in how maintenance and modification requests are managed and experienced. Feedback from providers indicates that outcomes can differ significantly depending on contractual structure, leading to inconsistency for tenants.

The transition to insourcing provides an opportunity to review and properly map these contractual arrangements; clarify roles and responsibilities for maintenance and modifications; and ensure consistent service standards across all housing managed or funded by Housing ACT, irrespective of the contractual arrangements in place. This is particularly important for tenants with disability, whose needs often require coordinated responses across housing and support systems.

Finally, while system and process improvements are essential, they cannot compensate for insufficient resourcing. The transition to insourcing is a critical inflection point and represents an opportunity to embed better systems and processes, however an insourced model that is not adequately funded will ultimately struggle to deliver improved outcomes. The transition must therefore be accompanied by realistic funding aligned with the scale of maintenance and renewal needs; investment in workforce capability; and recognition that improving service quality may require increased upfront investment to reduce long-term costs.

7. The bigger picture: reconceiving public housing as social infrastructure

The issues examined in this Inquiry are not isolated administrative failures. They are the predictable consequences of a policy framework that has, over many years, failed to recognise and resource public housing as the critical social and economic infrastructure it is. The consequences of this approach are now visible in every dimension of the current inquiry: in the lapse of SDA registration, in the delays to disability modifications, in the deteriorating condition

of the housing stock, and in the experiences of tenants who are failing to receive the support to which they are legally entitled. These are the consequences of treating public housing as a residual welfare cost to be contained, rather than as a productive public asset that underpins economic participation, population health, and social stability.

This framing is not just conceptually flawed – it is economically inefficient.

Public housing performs functions that no other part of the housing system can replicate. It provides deeply subsidised, secure housing to people who cannot be served by the private market, including many people with disability. In doing so, it enables workforce participation, supports engagement in education and care, reduces demand on acute health and crisis services, and provides the stability necessary for individuals and families to build and sustain their lives. These are not peripheral benefits, but are central to a well-functioning economy.

Conversely, allowing public housing to decline in scale and quality imposes substantial and avoidable costs elsewhere. Poor-quality or inaccessible housing contributes directly to increased demand for health services, including hospitalisations linked to mental health deterioration, preventable conditions such as respiratory illness, falls and chronic ill health. It drives higher use of homelessness services, increases interactions with the justice system, limits labour market participation, and entrenches long-term income support reliance. These downstream costs are routinely excluded from fiscal decision-making, obscuring the true economic value of sustained investment in public housing.

Public housing also plays a critical macroeconomic role. It acts as a stabiliser during economic downturns, enabling governments to invest counter-cyclically, sustain employment in construction and maintenance, and buffer households from market volatility. At a system level, it is the anchor of the broader social housing ecosystem. While community housing providers are an essential and valued part of that system, they operate under different financial models and cannot substitute for the role of government in delivering deeply subsidised, long-term, secure housing at scale.

The current trajectory is therefore untenable. Continued underinvestment, combined with a reactive approach to maintenance, is producing a compounding cycle of decline: ageing assets deteriorate, repair costs escalate, properties become uninhabitable or inaccessible, and the effective supply of public housing contracts further. This 'death spiral' is both socially damaging and fiscally irresponsible. There is a well-established evidence base demonstrating that planned, lifecycle-based asset management is significantly more cost-effective than reactive, emergency-driven maintenance. Yet the current system remains heavily skewed toward the latter, driving higher long-term costs while delivering poorer outcomes for tenants.

At its core, this reflects a deeper structural problem in how public housing is funded and governed. Housing ACT operates as a public trading enterprise, subject to quasi-commercial disciplines that are fundamentally misaligned with its social purpose. This model creates an inherent tension between financial imperatives and the obligation to provide safe, accessible, and affordable housing to tenants with low incomes and often complex needs. The constrained funding envelope and quasi-commercial imperatives under which Housing ACT operates

constrains long-term planning, reinforces short-term cost containment, and limits the capacity to invest in the maintenance and renewal required to sustain the asset base.

The consequences are evident:

- **Chronic underinvestment and asset deterioration**, driven by insufficient and unstable funding streams;
- **Reliance on asset ‘recycling’**, including the sale of public housing stock, which can reduce overall supply and disrupt tenants and communities;
- **Inequitable fiscal settings**, including the imposition of GST on public housing operations and the inability to leverage Commonwealth Rent Assistance, placing public housing at a structural disadvantage relative to community housing providers;
- **Limited access to capital**, constraining the ability to undertake large-scale renewal and maintenance programs; and
- **A narrowing and increasingly residualised tenant base**, which increases costs while reducing revenue, further entrenching financial pressure.

Taken together, these dynamics undermine both the social purpose and the economic efficiency of the system.

Reversing this trajectory will require more than incremental reform. It demands a fundamental reset in how public housing is conceived, funded, and delivered:

- **From residual welfare to core infrastructure**, with public housing explicitly recognised as essential infrastructure, and with investment decisions informed by its long-term social and economic returns.
- **From reactive expenditure to planned investment**, with maintenance and renewal funded and managed on a lifecycle basis, reducing long-term costs and improving asset performance.
- **From short-term savings to long-term value**, requiring budget frameworks that account for the avoided costs and productivity gains associated with a well-functioning public housing system.

ACT Shelter recognises this shift will not be straightforward. The scale of investment required to restore and grow the public housing system is significant, and the ACT Government cannot meet this challenge alone. The Commonwealth has a critical role to play, particularly given its greater revenue-raising capacity and the current misalignment in funding settings. This includes reforming federal funding arrangements to properly account for the real costs of operating, maintaining, and renewing public housing, and addressing structural inequities such as GST treatment and access to income support mechanisms.

However, the absence of easy solutions does not diminish the urgency of the task. There is no viable alternative pathway. The private market will not deliver housing that is affordable and accessible to those on the lowest incomes. Community housing, while essential, cannot replace the scale, depth of subsidy, and permanence of public housing provision.

Without decisive action, the system will continue to contract, deteriorate, and fail the people who depend on it. The consequences – social, economic, and fiscal – will only intensify.

ACT Shelter therefore calls on the ACT Government to:

- Reframe public housing explicitly as critical social and economic infrastructure, with long-term, stable capital and maintenance funding tied to lifecycle costs – comparable to the approach taken to other major public assets such as transport and health infrastructure;
- Develop and implement a comprehensive, long-term asset management strategy for the public housing portfolio, grounded in accurate data on property condition, informed by lifecycle cost analysis, and supported by rolling planned maintenance programs;
- Embed accessibility and the needs of tenants with disability across all aspects of housing policy, planning, and asset management, rather than treating these as specialist add-ons or discretionary considerations;
- Actively advocate to the Commonwealth for a fundamental reform of federal funding arrangements for public housing, including ensuring that the costs of operating, maintaining and renewing public housing are adequately and sustainably reflected in Commonwealth financial support to states and territories, and the removal of structural fiscal inequities; and,
- Recognise and protect the distinct and irreplaceable role of public housing as the non-market, deeply subsidised foundation of the housing system that complements, but cannot be substituted by, the private or community housing sectors.

A continuation of the status quo is not fiscally prudent, socially just, or economically sustainable. A fundamental shift is required and overdue.

8. Recommendations

ACT Shelter respectfully urges the Standing Committee on Public Accounts and Administration to make the following recommendations. These recommendations are interdependent and should be implemented as a coordinated reform package, given that isolated administrative changes, in the absence of structural reform and sustained investment, is unlikely to deliver the outcomes required.

On whole-of-government disability housing reform

1. *The ACT Government establish a Disability Housing Taskforce comprising people with disability, Disabled Persons Organisations, specialist disability housing providers, Disability Support Providers, Community Housing Providers, and relevant peak bodies. The Taskforce should guide the development and implementation of a Disability Housing Strategy and Action Plan.*
2. *The ACT Government develop and implement a dedicated Disability Housing Strategy, with a funded Action Plan, to:*
 - a) *assess current and future housing need;*
 - b) *address gaps in accessible and appropriate housing supply (including SDA and adaptable housing);*
 - c) *improve coordination across housing, disability, health and planning systems; and*
 - d) *clarify the role of Housing ACT in SDA delivery and oversight.*

On governance and accountability

3. *The ACT Government clarify and formalise the respective responsibilities of Housing ACT and Infrastructure Canberra for public housing maintenance and repairs, including disability modifications, to ensure clear, undivided accountability for tenant outcomes.*
4. *The ACT Government establish an external advisory group to support the transition to insourced maintenance, including tenant representatives (including people with disability), community housing providers and peak bodies, to guide system redesign and monitor implementation.*

On disability modifications and legal obligations

5. *The ACT Government clarify, document and communicate Housing ACT's legal obligations under the Disability Discrimination Act 1992 (Cth) and ACT legislation, and embed these obligations in policy, procedures, staff training and performance frameworks.*
6. *Housing ACT establish a specialist, centralised process for disability modifications, with defined timeframes for each stage; transparent communication standards; clear escalation pathways; and senior-level accountability.*
7. *Housing ACT implement comprehensive, standardised data collection on disability modification requests, including timelines, outcomes and unmet demand, and report publicly on this data on a regular basis.*

8. *The ACT Government commission an independent audit of outstanding disability modification requests, to quantify the backlog and develop a funded plan to address it within a defined timeframe.*

On SDA and NDIS interface

9. *The ACT Government develop and implement a clear position regarding Housing ACT's role in SDA, including re-establishing SDA registration where and if appropriate; or supporting alternative delivery pathways through specialist providers.*
10. *If the decision is made to re-engage with SDA registration, ensure it is supported by a credible plan and backed by adequate institutional capability, data systems and governance frameworks, and with clear targets for increasing the number of SDA-registered public housing dwellings.*
11. *Housing ACT ensure that if SDA funding is accessed through the NDIS, it is directed to genuinely improving the accessibility and appropriateness of public housing for tenants with disability, and that the utilisation of available SDA funding is maximised.*

On asset management, data and maintenance

12. *Implement an integrated asset and maintenance data system that: provides real-time visibility of maintenance requests and backlogs; captures property condition, maintenance history and accessibility features; and supports planning, reporting and accountability.*
13. *Establish a comprehensive property condition dataset, with Housing ACT to undertake regular, standardised condition assessments across the portfolio and maintain up-to-date data to inform lifecycle planning and investment prioritisation.*
14. *The ACT Government develop and publish a long-term asset management plan for the public housing portfolio, grounded in comprehensive property condition data, lifecycle cost analysis, and a commitment to shifting from reactive to planned maintenance over time.*
15. *The ACT Government ensure that the transition to insourced public housing maintenance involves meaningful engagement with and input from tenants – including tenants with disability – and is used to fundamentally redesign service delivery systems to be tenant-centred, data-informed and genuinely accountable.*
16. *Housing ACT establish clear, public performance benchmarks for maintenance (including timeliness, quality and tenant satisfaction) and report annually against these targets.*

On insourcing and tenant-centred service delivery

17. *The ACT Government ensure that the transition to insourced public housing maintenance involves meaningful engagement with and input from tenants – including tenants with disability – and is used to fundamentally redesign service delivery systems to be tenant-centred, data-informed and genuinely accountable.*
18. *Improve tenant interface and accessibility by implementing accessible systems for tenants to report and track repairs (including digital platforms with real-time updates), while maintaining non-digital pathways.*

On investment, funding and structural reform

19. *The ACT Government reframe public housing explicitly as critical social and economic infrastructure, and develop a long-term, stable funding model tied to lifecycle costs and asset sustainability, and moving beyond the current model of reactive, inadequate and short-term maintenance funding.*
20. *The ACT Government undertake a review of Housing ACT's structure as a public trading enterprise to assess whether it is fit for purpose, including options to better align governance, funding and accountability with its social objectives.*
21. *The ACT Government actively advocate to the Commonwealth for reform of federal housing funding arrangements, including sustainable funding for public housing operations, maintenance and renewal; and the removal of inequitable financial arrangements (such as GST treatment and access to Commonwealth Rent Assistance) that disadvantage public housing investment.*

Conclusion

The tenants at the heart of this inquiry – people with disability living in public housing who have been denied timely modifications, left in inaccessible homes, or failed by inadequate SDA administration – deserve better. They deserve housing that is safe, accessible and appropriate. They deserve a landlord that meets its legal obligations. And they deserve a government that treats their housing not as a residual welfare cost, but as the critical social infrastructure it is.

ACT Shelter is committed to working constructively with the ACT Government, Housing ACT, Infrastructure Canberra, disability advocates, tenant representatives and the wider community sector to achieve the reforms this situation demands. We are available to provide further evidence, information or assistance to the Committee as required.