Submission in response to discussion paper:

Provision of Social Housing

Terms of Reference

Contacts:

Carmel Franklin Leasa Mayes

Director Housing Financial Counsellor

Care Inc. Financial Counselling Service and the Consumer Law Centre of the ACT

Telephone 02-62571788

carmel.franklin@carefcs.org leasa.mayes@carefcs.org

About Care

Care Inc. Financial Counselling Service (Care) has been the main provider of financial counselling and related services for low to moderate income and vulnerable consumers in the ACT, since 1983. Care's core service activities include the provision of information, support and advocacy to low income and vulnerable consumers experiencing problems with credit and debt. Care also has a Community Development and Education program, makes policy and law reform comment on issues of importance to its client group and has operated a No Interest Loan Scheme (NILS) since 1997.

Care's Housing Financial Counsellor works specifically with public or community housing tenants and people who are homeless. The majority of current clients live in Public Housing. The role of the financial counsellor is to support and advocate for clients around their financial issues, including rental arrears, rental rebates and assistance with applications for housing assistance.

Thank you for the opportunity to provide feedback on the discussion paper 'Provision of Housing Terms of Reference'. Below we have made specific comments against the criteria that are of relevance to the work that we undertake:

1.The findings of the 2011 ACT Ombudsman's report to the ACT Housing priority housing waiting list, *Assessment of an Application for Priority Housing,* June 2011

Care supports the recommendations in the ACT Ombudsman's report to improve information provided to applicants regarding the options they have, including the process for reviewing additional information provided by the applicant. Care also supports flexibility in the assessment process to take into account the vulnerabilities of people experiencing homelessness. As noted in that report, those most affected by any adverse decisions or lack of information, in relation to housing priority are often amongst the most vulnerable in the community.

More assistance and a more proactive approach is required from Housing ACT to ensure that tenants understand application processes, know what information is required on forms and are made aware of any review options. For improvements to occur it is important that Housing ACT provide appropriate and ongoing training to staff.

4. The current range, availability and suitability of social housing stock including new models of social housing and any financial implications

Care supports improved energy efficiency of housing stock, including insulation and more efficient heating. Utility stress is a significant issue amongst our client group. We note that people on low incomes spend a disproportionate amount of their income on energy. This is particularly the case for people with disabilities or with young children who spend a lot of time in their home. Care also supports education to new tenants on the most effective use of appliances and other energy saving tips. Improvements in energy efficiency in conjunction with the provision of information about ways to reduce energy costs could lead to increased quality of life for low income and vulnerable people who are currently facing large and unaffordable energy costs.

5. The management and maintenance of social housing stock including the development of an asset management plan

The development of an asset management plan is important in ensuring public housing stock does not deteriorate and that tenants are not living in substandard accommodation. Tenants regularly request that specific maintenance be undertaken on their property. Feedback from clients would indicate that tenants are frequently not informed of outcomes to their requests or provided with any information on timelines for regular maintenance projects. We are in favour of a clearer and more transparent process for maintaining stock, be established. An asset management plan would assist with this.

At times requests for maintenance are made because of damage to a property. If this damage is the result of a criminal action or fair wear and tear, tenants can write a statutory declaration and provide the police job number and request that Housing ACT cover the cost of the maintenance. Clients however, regularly present to Care's Housing Financial Counselling Service with sundry debts in relation to the upkeep of their property. Care supports a more formal process where requests are followed up with a letter explaining the outcome, reasons and appeal rights of the tenant.

6. The needs of social housing managers and all social housing tenants

Difficulties contacting Housing Managers (HMs) is frequently reported by tenants. Many tenants recount leaving messages which were not returned and waiting for long periods for crucial information from Housing, such as the amount of rent to pay or the outcome of an appeal. Often tenants don't know if their HM has received their message or their rebate application, which is frustrating for tenants who have been told they are required to make contact with their HM within specific timeframes. An example of a problematic situation is when a tenant receives a Notice to Remedy and tries to make contact with their HM with no success – Housing then serves the tenant a Notice to Vacate. Tenants also report that their HM changes frequently. Although Care supports the current system where tenants have a specific contact person, this system is clearly not working effectively or efficiently.

Housing ACT could consider the current Centrelink model or the Central Intake service, where the front line staff triages requests and responds to the tenant's immediate needs. In practice this would mean that if a tenant needs to lodge a rental rebate, they could sit down with someone and go through the application at the time. This way tenants get assistance when they need it and when they are available to discuss their needs. Care believes that this system would provide the following benefits:

- A more efficient way resolving issues
- Ensures consistent service delivery
- May assist tenant's understanding of the processes they are participating in and allow them to feel more engaged.

7. Any other related matter

Care supports a more flexible approach to rent arrears repayment agreements. Housing ACT has a policy to accept a minimum of $15 per week towards the repayment of rent arrears. Tenants are often referred to Care from Housing ACT after they have offered a lower repayment amount. This amount has been refused as it is outside of current policy. We see a number of clients who are on very low incomes or have financial circumstances that mean they cannot realistically afford to meet the minimum $15 repayment. These clients do however want to repay their rental arrears and reduce the risk of eviction. Care supports a debt management policy that enables tenants to repay debt at an amount that is affordable, taking into account their particular circumstances. A reduction in the minimum payment amount would assist tenants on low incomes.