



Submission on
Inquiry into the Provision of Social Housing

December 2011

About ACTCOSS

ACTCOSS acknowledges that Canberra has been built on the traditional lands of the Ngunnawal people. We pay our respects to their elders and recognise the displacement and disadvantage they have suffered as a result of European settlement. We celebrate Aboriginal and Torres Strait Islander cultures and ongoing contribution to the ACT community.

The ACT Council of Social Service Inc. (ACTCOSS) is the peak representative body for not-for-profit community organisations, people living with disadvantage and low-income citizens of the Territory.

ACTCOSS is a member of the nationwide COSS network, made up of each of the state and territory Councils and the national body, the Australian Council of Social Service (ACOSS).

ACTCOSS' objectives are a community in which all people have the opportunities and resources needed to participate in and benefit from social and economic life and the development of a dynamic, collaborative and viable community sector.

The membership of the Council includes the majority of community based service providers in the social welfare area, a range of community associations and networks, self-help and consumer groups and interested individuals.

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Acronyms

AHURI	Australian Housing and Urban Research Institute
CAP	Central Access Point
MDP	Multi-Disciplinary Panel
SHR	Social Housing Register
TOR	Terms of Reference
TRM	Tenant Responsible Management

Introduction

ACTCOSS welcomes the opportunity to provide comment to the Standing Committee on Health, Community and Social Services Inquiry into the Provision of Social Housing. This submission will address the terms of reference (TOR) of the inquiry and several other comments regarding the provision of social housing and how it fits within the broader context of housing in Canberra.

Access to adequate housing is a fundamental human right and essential for a person to live with dignity. The Office of the High Commissioner for Human Rights has stated there are a number of conditions which must be met before particular forms of shelter can be considered as 'adequate housing'. The minimum criteria include:

- Security of tenure;
- Availability of services, materials, facilities and infrastructure;
- Affordability;
- Habitability;
- Accessibility: Housing is not considered adequate if the specific needs of disadvantaged and marginalised groups are not taken into account;
- Location: Housing is not considered adequate if it is cut off from employment opportunities, health care services, schools, childcare centres or other social facilities, or if the dwelling is located in dangerous or polluted areas;
- Cultural adequacy: Housing is not adequate if it does not respect and take into account the expression of cultural identity.¹

Addressing the Terms of Reference:

1. Findings of the 2011 ACT Ombudsman's Report

The case addressed in the Ombudsman's report² is concerning but by no means surprising. Consultations have revealed this is not an unusual story but one which mirrors the experience of many people who have attempted to access social housing who have been disadvantaged due to flaws in Housing ACT procedures.

ACTCOSS supports the recommendations of the Ombudsman's report. It is pleasing Housing ACT are already working on some of the issues raised by the report.

1 UN Habitat, *The Right to Adequate Housing*, Fact Sheet 21, 2009, p.3

2 ACT Ombudsman Report No. 01/2011 *Housing ACT: Assessment of and application for priority housing*, June 2011

The report highlights a significant failure to communicate appropriately, and where communication did occur it was actually misleading. When dealing with social housing applicants – some of whom are the most vulnerable people in our community – appropriate, relevant, accessible and timely communication is essential. Significant frustration has been expressed by applicants and support workers who receive limited or no communication as to the status of their public housing applications. When emails and calls are made to Housing ACT they are often not returned. Significant time is wasted and applicants are left in limbo with no information as to the status of their application or if further information is required. There is also concern applicants who don't have support workers to assist them have even less chance of having their needs addressed (as indicated by the case in the Ombudsman's report).

Communication issues are not limited to the application phase (see also section on tenant responsible maintenance). It is not simply whether calls are returned at issue but the accessibility and relevance of the information provided to applicants and tenants. Housing staff have often said information on many issues has been provided in application and tenancy packs, and in Housing ACT newsletters, as evidence of communication on a range of issues. However, there are several issues with this being the key source of information provision. One proactive way to try to ensure forms and information sheets are understandable and accessible, is to have a core group of consumers (eg. joint champions) and service providers to provide feedback during the development phase. Another issue is even when information is provided once many do not keep or retain such information long term, nor recall it when an issue arises such as a maintenance issue. Therefore staff need to proactively provide information which might be of relevance to applicants and tenants throughout their tenancy, not just at the point of application or allocation. It is important to note around 78,000 Canberrans do not have the minimum required literacy skills to meet the complex demands of everyday life and work.³ This means the traditional reliance on the provision of information in written format may be inadequate and social housing staff must find a range of ways to communicate information on an ongoing basis.

Lack of appropriate processes to manage staff turnover have been identified as a significant barrier to effective communication. Applicants and tenants are rarely informed when their assessing officer or housing manager changes. This has often meant people are trying to contact the wrong staff member, exacerbating an already difficult situation. Processes need to be put in place to ensure continuity of service for applicants and tenants when staff change or go on leave.

3 ACTCOSS, *On the same page: towards partnerships for adult literacy in the ACT*, February 2009

2. Demand for social housing including an examination of the current waiting lists and eligibility criteria for priority and high needs housing

The introduction of the Multi-Disciplinary Panel (MDP) to assess eligibility for priority housing has been welcomed as a positive step; however assessment timeframes are of significant concern. The time it takes from the lodgement of an application to the day which it is heard before the MDP is unreasonable. There appears to be an internal bottleneck where applications are 'waiting for write ups' before being assessed by the MDP. There is a lack of clarity and transparency as to whether Housing's internal processes are working. It has been recommended by the Ombudsman these process be reviewed. Once an application has been heard by the panel, or if it has been decided there is insufficient evidence to make the case for priority housing, it is often perceived there is a lack of information provided by Housing ACT as to why a particular decision has been made. This raises again the need for appropriate communication in all engagements.

A continuing point of concern is the onerous nature of application processes, especially considering people applying are often the most vulnerable in our community. The application process is almost impossible to negotiate without support from a community worker. While there are a range of community supports available, not all applicants are accessing these supports. As a public authority under the Human Rights Act⁴, Housing ACT must ensure the most vulnerable applicants are able to negotiate their processes, and human rights principles are applied in decision making.

The Government's response to the Ombudsman's report outlined the policy to target Public Housing to those most in need and eligibility would not be determined on affordability alone. Whilst targeting people most in need can be argued as an appropriate response when resources are constrained, it does raise some issues. There are many who struggle with affordability for some time and eventually fall into crisis who might not have done so had they received assistance earlier.

Additionally if eligibility criteria are tightened a significant gap can be created between those who are eligible for social housing and those who can afford private rental. Since the assessment criteria for social housing were recently tightened, many more Canberrans have fallen through the gaps. They are no longer eligible for social housing but the private rental market remains out of their reach.

It is important to maintain a mix of people in social housing. As targeting is narrowed this can lead to greater stigmatisation of people in social housing. AHURI has demonstrated:

The negative stigma associated with social housing is symptomatic of the policies enacted by successive governments. It will remain entrenched unless adequate funding is available and social housing can be accessed

4 Human Rights Act 2004 part 5A, 40A and 40B (3)

by a broad range of socio-economic groups, not just those with high levels of need.⁵

Recommendations

- Review communication and internal processes for the assessment of applications, and reduce the time frame between application and assessment.

3. Management of waiting lists, innovative strategies to reduce waiting lists and the development of the Social Housing Register

If Government is seeking to assess the level of need in the community, eligibility needs to be set at a realistic level. If, as a result, there are long waiting lists it is as a direct response of need. In the past waiting lists have been 'managed' by tightening eligibility criteria. Additionally arbitrary levels have been set, such as the priority housing list will have a limit of 150 people. Neither of these measures changed the need, they simply tweaked the lists to make it appear the need had lessened. This is not 'list management' but simply bad policy, making social housing inaccessible for many who have no other option.

Where realistic eligibility criteria are set, waiting lists go up and down as an indication of need. The way that need is managed should be a separate issue. Improvements in gateway services processes, while necessary, will not lessen the actual need for ongoing increase in stock numbers. The need indicated by waiting lists should inform Government's allocation of resources, and inform broad government policy addressing housing affordability in Canberra.

The removal of the cap on the priority housing list has been welcomed, as has been the recent injection of social housing stock which has led to some positive movement in the waiting lists in recent times.

Social housing register

ACTCOSS expressed concerns prior to the development of the Social Housing Register (SHR) that it would become the only way applicants could access community housing. This would limit accessibility to all social housing options for people who are not comfortable dealing with Housing ACT. This discomfort may be for a variety of reasons. Some vulnerable people, including Aboriginal and/or Torres Strait Islanders, have indicated a reluctance to deal with government bodies due to negative historical experiences. As a result this may limit their ability to access any community housing services as they are unwilling to interact with Housing ACT.

⁵ AHURI Final Report No. 166, *The stigmatization of social housing: findings from a panel investigation*, April 2011, p.24

Consideration must be given to people who may have been a tenant of Housing ACT in the past and whose tenancy has not ended well, for example leaving a large debt or being evicted. Previously such people have been able to move on and seek assistance from community housing providers, whereas now people may not feel they have this option as they will need to apply through the SHR which is managed by Housing ACT.

These concerns remain. Consultations revealed some community housing providers are concerned prospective tenants who would traditionally have applied for community housing are not doing so now because they are required to provide personal details to a register managed by government. If this is the case it is a significant concern as there are limited other options for people experiencing disadvantage in Canberra.

A concern community housing providers have expressed is with one centralised register applicants have a tendency to tick everything, however they may not have an appropriate understanding of what community housing is. Previously when people applied to community housing providers they would explain in detail the difference between public housing and community housing (such as the support provided but also the expectations in share accommodation and house rules). There is concern applicants are no longer being provided this level of information as they are applying through the SHR. Additionally some reports indicate the application process seems to be more onerous for applicants seeking community housing rather than simpler.

A number of share community housing providers have indicated an increase in difficulty and time taken to fill vacancies since the introduction of the SHR. With the level of unmet need it is of concern when any accommodation position remains vacant for longer than necessary; additionally when vacancies go unfilled for longer periods this results in a loss of rental income for the provider.

The development of the SHR was intended to make social housing more accessible, with a straightforward process for applicants. ACTCOSS recommends a review of the social housing register addressing whether these key purposes of the development of the social housing register are being achieved, and whether there have been any benefits from its introduction. If this has not in fact been the outcome, the SHR needs to be reshaped to respond to actual need.

Recommendations

- Ensure eligibility is set at a realistic level, ensuring waiting lists are an indication of actual need. The level of need should inform Government's allocation of resources.
- Undertake a review of the social housing register.

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

Current waiting lists indicate availability of stock is a pressing issue. The recent injection of stimulus money to grow the social housing stock in Canberra has been most welcome. The significant development in targeted older person's accommodation has been particularly well received. This progress which has been made in recent years must be ongoing. As the Commonwealth Government's stimulus money has now been spent the ACT Government must commit to building and maintaining additional public housing properties.

In a previous submission⁶ ACTCOSS highlighted the ACT has not yet recovered from the substantial cuts to public housing stocks in the last decade. Even with the recent injection of new social housing stock through the Nation Building project, the proportion of public housing remains below 10% of housing stock in the ACT. ACTCOSS supports the Greens-Labor agreement that public housing be maintained at a rate of 10% of all housing stock, and that all future housing developments (and redevelopments) have a mix of public, community, affordable and private housing.

There is clearly an ongoing need for additional public housing stock to be provided in the ACT, considering:

- Current waiting lists;
- Continuing bottle neck in homelessness accommodation services;
- New focus on a Housing First approach;
- A likely decrease in number of crisis and transitional beds in the homelessness system; and
- The knowledge there will be new people seeking support in the future.

Great concern has been expressed about the unsuitability of a significant portion of social housing stock. Many of the properties are ageing, requiring major maintenance. When developing or acquiring new stock it is preferable more social housing properties be interspersed among general housing stock, so as to not create areas of significant concentrations of disadvantage.

There is a need to expand community housing options in Canberra. Due to the large waiting lists of people eligible for public and community housing, a significant portion of new community housing needs to be income related (as with public housing) rather than being offered at 75% of market rent. When developing or acquiring stock to allocate to community housing, Housing ACT needs to consult with community housing providers about what will best suit the needs of their tenants, especially where the accommodation will be share accommodation or accommodation for people experiencing disability.

⁶ ACTCOSS, *Submission on the DHCS Discussion Paper: The Road Map, Chapter 1*, 2010, p.7

While ACTCOSS recommends an increase in community housing stock this should not be at the expense of stock numbers in public housing. Minister for Housing, Joy Burch, reaffirmed commitments of her predecessor, John Hargraves, when addressing the Legislative Assembly on the growth of community housing in the ACT:

- That community housing growth should not occur through the loss of overall stock numbers in public housing;
- Public housing must still be viable; and
- There should be no reduction in the capacity overall to house priority clients into the future.⁷

Recommendations

- Increase public housing stocks in the ACT and maintain them at a rate of at least 10% of all housing stock.
- Continue to resource the growth of community housing and ensure a significant proportion is provided on a percentage of income basis.

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

Maintenance

Much of the social housing stock in the ACT is aging and in significant need of repair. Consultations have revealed dissatisfaction with Spotless management of the maintenance program for Housing ACT. Many services report properties are not maintained to the standards expected in the private rental market and often maintenance is not performed on ACT Housing properties unless it is classified as an emergency. Poor maintenance poses increased risk for tenants and is particularly concerning for people with disabilities, a group who are a significant proportion of public housing tenants. Consultations have indicated where modifications due to disability requirements are needed such requests are often not handled in a timely fashion. These modification requests are not optional improvements but are required for tenants to maintain their independence. Specialist homelessness services who head lease properties report they bear a great deal of maintenance costs as Housing ACT has not maintained the properties appropriately. Where maintenance requests from specialist homelessness services are accepted there have been issues with communication with contractors - requests that contractors call services in advance of coming to a property are often ignored. When dealing with vulnerable people there are often good reasons for such requests.

⁷ J Burch MLA, 'The Different approaches to Public and Community Housing in all Jurisdictions', Address to the ACT Legislative Assembly, 16 November 2010

It is unclear how maintenance on carpets and painting is managed. There is some indication there are cycles where properties will come up for carpet replacement and painting after a certain number of years, many tenants assume they will be contacted at that stage. However there are reports if this maintenance is not officially requested, it is not performed. Clarification is required as to how cyclical maintenance is managed.

ACTCOSS supports the introduction of minimum housing standards in Canberra.⁸ Requiring minimum standards of water and energy efficiency will reduce the ongoing energy consumption of a property and therefore the ongoing costs to the tenant. It can also radically improve habitability and health outcomes. Additionally the level of security provided in a home can affect how people are able to use their home and feelings of safety.

Improvements in energy efficiency will not only benefit tenants, it will also tie in with the Government's agenda to reduce overall ACT emissions. Last year's *Climate change greenhouse gas reduction Act 2010*,⁹ outlined a target to reduce emission levels by 40% by June 2020 (from 1990 figures).

There has been some recent work to improve the energy efficiency of some properties. This work is most welcome. However, one of the measures may unfortunately have created unintended consequences of increased overall energy costs. In some areas where the provision of gas hot water has not been an option, electric boost solar hot water systems have been installed. This appears to have actually increased energy costs for people as they have switched from off peak hot water to solar systems some which require electric boost which is at peak rates.

There are concerns numerous substandard properties have been offered to tenants who have felt they have had no choice but to accept the property, which was not cleaned appropriately or was in need of repairs. There may be a procedural failing where Housing ACT has Spotless clean and sign off on properties however Housing ACT does not inspect them themselves. Housing ACT needs to ensure all properties are appropriately cleaned and functional with no outstanding maintenance required before they are re-let. It is completely inappropriate vulnerable people are expected to accept properties which are not clean or have outstanding maintenance issues.

The timeframes taken to re-let vacant dwellings are of concern when considering the lack of available properties and the extensive waiting lists of people eligible for social housing. In 2009-10 about 87% of vacant properties were re-let within 28 days but in 2010-11 this decreased to only 79%.¹⁰

There are procedural and communication concerns around Tenant Responsible Maintenance (TRM). It is not always made clear to tenants when they report a maintenance issue whether it will likely be billed back to them as TRM. Housing ACT have provided information on TRM in their packs, however, as has been discussed previously it is important Housing ACT (and their contracted

8 ACTCOSS *Comment on the Residential Tenancies (Minimum Housing Standards) Amendment Bill 2011*, June 2011

9 *Climate Change and Greenhouse Gas Reduction Act 2010*

10 Community Services Directorate Annual Report 2009-10 and 2010-11

providers ie. Spotless) communicate at each encounter information which is of relevance to the tenant regarding current issues. Tenants need to be informed at the time they report the maintenance issue if it will likely be TRM and need to be told they have the option of getting other quotes. Additionally, there needs to be clear information provided as to how people can appeal TRM decisions. Where appeals are made these need to be handled in a timely manner so as not to have a debt sitting against an account unresolved for an unreasonable amount of time. Additionally, it is not widely known tenants can enter into repayment agreements for TRM. Housing managers need to communicate this option to their tenants when bills are sent.

Where maintenance is not handled appropriately this can have a major impact on people's ability to sustain a tenancy. Appropriate funding must be allocated to ensure properties meet minimum standards.

Asset management

ACTCOSS has long advocated the development of a comprehensive asset management plan for public housing is necessary to support the maintenance of the Territory's largest single asset.

As public housing is being increasingly targeted to people most in need, there are less tenants in public housing paying full market rent, therefore there is increased financial pressure in maintaining the system. It appears the trend to address shortfalls in recent years has been to sell housing assets in the inner city area, and when acquiring new assets focusing on cheaper properties which are often in outer Canberra. While this may be a financially sound approach it is not sustainable long term nor does it acknowledge issues associated with locational disadvantage.

When managing social housing assets social impacts must also be considered as well as financial benefits. The location of properties can be absolutely key in whether an individual is able to sustain their tenancy and participate fully in society. The long term strategy in the development and acquisition of properties must be to provide the majority of social housing properties in proximity to amenities such as public transport, schools, shops and community facilities. Given the majority of tenants are experiencing multiple disadvantage they benefit from being located in communities with appropriate amenities, connections and supports. Where people are disconnected this can adversely impact their ability to sustain a tenancy as well as their overall well-being in a multitude of ways.

Additionally, given the significant proportion of tenants who are experiencing disability or who are frail aged, an asset management plan should consider increasing the percentage of overall stock with accessibility features. As new properties are being built with universal design features¹¹ (as outlined in the ACT Labor-Greens Agreement) as many of the existing properties as possible

11 K. Gallagher and M. Hunter joint communiqué *Ninth joint meeting between the ACT Labor Government and the ACT Greens* 2 November 2011

should be modified to ensure they are accessible for tenants experiencing disability.

Further comment on the development of an asset management plan is difficult as there is no objective data available on social housing stock in the ACT. It is recommended the Legislative Assembly request Housing ACT report data on recent property sales and acquisition, current assets (including housing types and regional locations), and stock management.

Recommendations

- Improve the maintenance standards and timeframes for social housing properties.
- Implement a plan to upgrade a significant proportion of existing stock to meet universal design criteria and energy efficiency requirements.
- An asset management plan must take into account access to public transport, schools and community facilities.

6. Needs of social housing managers and social housing tenants

Social housing staff

Whilst the inquiry has asked for input into the needs of social housing managers, many of the comments in this section are applicable to other staff in Housing ACT such as applications and allocations staff.

An AHURI study found tenants and housing managers understanding of their role was very different. Managers and staff of social housing authorities clearly expressed the view their role was housing and they didn't want to become involved in co-ordinating care and support for tenants.¹² The challenge for public housing providers is to move beyond such a minimalist view of their role.

Consultations indicate there remain inconsistencies within Housing ACT where some housing managers work well with disadvantaged people, providing support where required, and other housing managers who seem to limit their role to property management alone. Social housing managers need to be more than real estate agents. They should be the model providers real estate agents can learn from.

Social housing staff need skills in the delivery of human services and must be provided with appropriate support and training to be working with many of the most disadvantaged people in society. Training for staff should include cultural awareness training (both for working with Aboriginal people and Torres Strait Islanders as well as people from culturally and linguistically diverse

¹² AHURI, *Older persons in public housing: the policy and management issues*, 2008, p.6

backgrounds), and training in working with clients with complex needs. Additionally staff need to have increased awareness of how best to work with people who have low literacy levels.

There is scope for further specialist housing managers to be identified to work with specific communities. Housing ACT already has a good model to draw from in the specialist youth housing managers, and it is understood there are new specialist managers to work with the frail aged. Housing managers with specialist experience with the target group concerned can offer broader support than standard tenancy management, which can lead to better outcomes for both tenants and housing authorities. Specialist housing managers could likewise be employed to work holistically with other target groups to offer additional support such as: Aboriginal and/or Torres Strait Islanders; culturally and linguistically diverse communities; and people experiencing disability. Recognising there is diversity and many different issues within groups, there are shared issues for some groups which may affect their ability to access and sustain housing.

Additionally improved linkages need to be explored between support services and public housing providers. Improved linkages could aim to create a better flow of information between public housing providers and support services, assisting to inform housing providers about the range of services available, as well as support services to know what is being offered through the housing provider and if there are any issues. This would assist in identifying and addressing gaps in support.¹³

When addressing the needs of housing managers and staff it is essential to address staff caseloads and support. Some of the communications issues raised earlier in this submission can likely be attributed to unmanageable case loads and insufficient staffing. Thus communication difficulties must be addressed at this systemic level, in addition to simply encouraging and training staff to communicate better. Social Researcher Dr Eileen Munro has undertaken leading research calling for greater support for workers in such systems:

problems are rarely due to a "bad apple", one incompetent worker who caused it all. They usually result from a combination of small lapses by several people.¹⁴

If case loads are excessive, training and new policies around communication will not address the fact there may simply not be enough hours to appropriately follow up all applicants and tenants in a timely manner. Having appropriate staffing levels with realistic caseloads will mean better outcomes for all applicants and tenants, and may lead to less turnover of staff within Housing ACT.

Additionally, Housing ACT staff are often working with clients who are experiencing multiple disadvantage and the stories staff are told can be quite distressing. Due to the stressful nature of the job, as with many other human

¹³ AHURI, *Older persons in public housing: the policy and management issues*, 2008, p.16

¹⁴ Dr E Munro "Protecting children is like guessing whether a headache is a tumour" *Sydney Morning Herald* 25 March 2008 accessed at www.smh.com.au

services agencies, it is critical appropriate support be provided to staff, and appropriate time be allocated for staff to access that support.

Recommendations

- Explore appointing additional specialist housing managers to work with specific population groups.
- Ensure Housing ACT staff are provided with appropriate training and support.

Tenants

The tenants of social housing are often the most vulnerable in our community with a range of needs requiring a flexible and responsive approach. Many of the needs of social housing tenants have been raised elsewhere in this submission, such as timely and responsive communication, properties which are well maintained, safe and are located in close proximity to transport, schools and community connections and supports.

Some tenants require support to sustain their tenancies. A common requirement of support is financial difficulties. As indicated earlier some initial support should be provided by housing managers. For example, it has been reported some referrals to specialist financial counselling services could have been handled by housing managers themselves as all that was required was simple budgeting assistance. In more complex cases where external support is warranted, it must be accessed in a timely manner. Tenancy support services and financial counselling services report often they have been contacted when rent arrears have accumulated to such an extent the tenancy is already in jeopardy. There is little these services can do at this stage, whereas if they had been contacted earlier they could have worked with the tenant and Housing ACT to put a repayment plan in place. Where Housing ACT have referred tenants to external support, it is important Housing ACT work with those services and the tenants around ways forward to ensure tenancies are sustained.

Other Comments

Accessibility

It is of concern most applicants for social housing need to go the Central Access Point (CAP) at Belconnen to lodge their applications. Even where community housing applications are lodged through community housing providers who then forward applications on to be added to the Social Housing Register, applicants are still required to provide their identification at the CAP. Whilst the CAP was designed to provide an accessible venue for a range of

housing options, its single location at Belconnen makes it inaccessible to a number of people experiencing disadvantage who have limited access to transport. While Housing ACT has made available some outreach workers to take applications at locations around Canberra these opportunities are not regularly available or widely publicised.

The most significant concern of the centralisation of Housing administration at the CAP is it is the single access point to pick up keys to view properties. When applicants are called to check out a potential property they must go to the CAP to collect keys, go view the property, and return the keys to Belconnen, all in the one business day. Where applicants have no option but to use public transport this can be incredibly difficult. In the past where people were able to collect keys from a choice of regional shopfronts this was more accessible.

Recommendation

- Ensure Housing ACT services can be accessed at a range of locations around Canberra.

Disincentives to progress circumstances

Concern has been expressed given the significant timeframes experienced between application and allocation, there is a risk people are kept in a kind of limbo where any attempts to improve their situation may affect their application status. It is counterproductive that applicants on long waiting lists are placed in a position where if they accept employment or improve their circumstances in other ways, they then render themselves ineligible for public housing – when they in fact did meet the criteria when they first applied and had a property been available at that stage they would have been allocated it.

Consultations raised rental increases as a concern. It can be a disincentive for some to seek employment if their rent is increased as soon as their income increases. While Housing ACT policy allows for a rental rebate to be extended by 6 months when employment commences¹⁵, consultations reveal this extension is not well known, leading to the aforementioned concerns.

AHURI research on how living in public housing affects women's employment found:

The rent rises due to income based rents were identified as a strong disincentive to working, and contributed to a poverty trap (low or even negative financial returns from work).¹⁶

The combination of the withdrawal of income support (from Centrelink) together with increased rent (up to market rent) as wage income increases was identified as an ongoing obstacle for women remaining in paid work.

15 Community Services Directorate *Rental Rebate Policy* accessed at http://www.dhcs.act.gov.au/hcs/policies/rental_rebate_policy#Employment

16 AHURI Research and Policy Bulletin 143, *How does living in public housing affect women's employment?* September 2011, p.1

Some women decided to reduce their working hours because, by the time their income support had decreased and their rent increased, working left them worse off financially.¹⁷

Housing ACT should ensure none of its processes are inadvertently providing disincentives to individuals to progress their circumstances.

Aboriginal and/or Torres Strait Islanders

There has been an increase of self-identified Aboriginal and/or Torres Strait Islander public housing tenancies in the ACT from 435 in June 2010, to 520 in June 2011 housing 1,147 residents.¹⁸ However this is still likely to be an under-report of the actual numbers of Aboriginal and/or Torres Strait Islanders housed in public housing.

ACTCOSS commends the recent AHURI report *Urban social housing for Aboriginal people and Torres Strait Islanders: respecting culture and adapting services* to this inquiry and would like to draw attention to key points and findings of the report which should be considered in any review of social housing provision in Canberra. Underpinning the study is the viewpoint “social housing in all areas should be provided in ways that are consistent with cultural values and Indigenous aspirations”¹⁹.

Social housing is a very significant tenure for Aboriginal people and Torres Strait islanders in Australia with three in ten households living in social housing. Demand for social housing for Indigenous applicants is also high due to population and household growth, the lower average incomes in this group, the significant numbers of homeless Indigenous people, and barriers faced by many Indigenous people in accessing private rental and home ownership, including affordability and discrimination.²⁰

Current evidence suggests that a ‘one size fits all’ service model and a standard approach to governmentality are inadequate to respond effectively and appropriately to the diversity of housing needs and aspirations of Indigenous people residing in urban areas... The key findings show that there are major shortcomings in the urban social housing service system with regards to Indigenous needs and values.²¹

The barriers faced by many Indigenous social housing clients in accessing services and the lack of flexible service delivery practices and options must be addresses. Initiatives that should be actively pursued include more Indigenous staff, culturally safe and welcoming service settings, greater use of outreach and partnering with well-connected Indigenous services. Such

¹⁷ Ibid p.3

¹⁸ Community Services Directorate, *Annual Report 2010-2011*, p.108, 114

¹⁹ AHURI Final report No. 172, *Urban Social Housing for Aboriginal people and Torres Strait Islanders: respecting culture and adapting services*, August 2011

²⁰ Ibid p.1

²¹ Ibid p.3, 5

service models will help to improve access, empower clients and sustain tenancies.²²

AHURI developed a set of principles to guide endeavours to improve service delivery and to better integrate policies and services in the social housing services delivery system for Indigenous households:

1. Respect for first peoples and recognition of their urban disadvantage;
2. Indigenous participation and institutional capacity building;
3. Increasing housing choices;
4. Inclusion of Indigenous housing organisations;
5. Increased capital investment;
6. Transparent planning and resource allocation;
7. Cultural appropriateness in mainstream policies and services;
8. Indigenous employment across the social housing system.²³

As has been raised earlier in this submission it would be beneficial to have a number of specialist housing managers to work with Aboriginal peoples and/or Torres Strait Islanders. It is preferable such positions be identified positions, held by Aboriginal and/or Torres Strait Islander staff. There have been individual positions in Housing ACT from time to time however, given the number of tenancies and applications from this population group, and given the reluctance of many Aboriginal and/or Torres Strait Islanders to engage with government agencies, a team of specialist housing managers is warranted to make Housing ACT as accessible as possible to this population group.

These workers should be available to work with tenants from the application and assessment phase right through to tenancy management. It would also be beneficial for this team to have the outreach capacity to have a regular presence at Aboriginal and/or Torres Strait Islander services such as Gudan Gulwan and Winnungah Nimmityjah to receive applications, follow up inquiries, take complaints, and provide clear explanations of processes ensuring applicants and tenants have clear understanding of both their requirements and their rights.

Housing ACT publications and the website should provide clear indication of how the team can be accessed by Aboriginal peoples and/or Torres Strait Islanders. Additionally, other Housing ACT assessment officers and housing managers should communicate with applicants and tenants this team is available should they wish to access it. However, the availability of such a team should not preclude all Housing ACT staff from receiving cultural awareness training and being available and willing to work with Aboriginal peoples and Torres Strait Islanders in a sensitive and consistent manner.

²² Ibid p.6

²³ Ibid p.7

If such a team is established it would be able to link in the with the work already undertaken by the Gulanga Project, designed to assist ACT Homelessness Service Providers to improve the systemic response to support the employment of Aboriginal and Torres Strait Islander workers within the homelessness sector.²⁴

ACTCOSS also recommends the development of further Aboriginal and/or Torres Strait Islander community housing programs where people can access accommodation with income related rent, but also access specialised support in a community setting. Consultations have indicated this would be particularly beneficial for older Aboriginal peoples and/or Torres Strait Islanders. The Munjuwa program in Queanbeyan is an example of a beneficial community housing approach for such a target group where residents access support from the program but also from the surrounding community of other tenants.

Recommendations

- Establish a team of Aboriginal and/or Torres Strait Islander specialist housing managers.
- Develop further community housing programs for Aboriginal peoples and/or Torres Strait Islanders.

Broader context

There are significant jurisdictional issues in Canberra which have been acknowledged in the Government's response to the Ombudsman's report:

Unlike large metropolitan cities, Canberra does not have an existing low cost rental market of any scale, in terms of property size, location and amenity, nor are there areas where housing costs remain relatively less expensive to rent or purchase. In recognition of the lack of housing options for people on low incomes to purchase or rent, the ACT has retained a higher than average proportion of public housing stock than other jurisdictions over time.

The ACT's high median income also means that the rental market predominately provides housing for medium income individuals and families. However, high median rental costs in the ACT means that many households of low to middle income in the private rental market also suffer the highest levels of housing stress.²⁵

The lack of affordable private rental means social housing is called upon to meet a need which it is not required to in other jurisdictions around Australia. In Canberra it is almost the only long-term housing option for low income people. While increasing 'affordable housing' stock in Canberra is welcome, housing available at 75% of market rent is still more than 100% of the common youth

²⁴ For more information on the Gulanga Program visit www.actcoss.org.au/secdevel/gulanga.html

²⁵ ACT Ombudsman, *Housing ACT – Assessment of an Application for Priority Housing, Part 5 – Agency Response*, June 2011, p.15

allowance, and is by any definition 'unaffordable' to anyone in receipt of a Centrelink benefit. Therefore there is significant responsibility on government to maintain, and preferably increase, the social housing stock with income related rent in Canberra.

A central point in any analysis of the ACT housing system is the decline in housing affordability has had effects across the board. Tinkering at the edges of the public housing system will do little to solve the problem in the long term. It must be remembered the supply of affordable housing outside the social housing sector is a key driver of public housing demand.

The increasing cost of housing in the private market and in particular the lack of affordable rental properties has driven rising demand for public housing. Unless government policies address the underlying causes of the increase in demand for public housing, the situation is unlikely to improve. While an attempt to stretch the public housing dollar more thinly is understandable, it is a band-aid solution and only rearranges the assistance provided by government – it does not increase it.

ACTCOSS sees many of the issues faced by the public housing system are systemic in the housing market and only a solution which involves adjusting private market outcomes will be able to comprehensively address the issues.