



Community Housing
Federation of Victoria
Incorporated

**Submission on Victoria's
Homelessness 2020 Strategy
Discussion Paper**

November 2009

Ending homelessness

CHFV congratulates the Victorian Government on its commitment to addressing homelessness and in particular on its genuinely consultative approach in developing the Homelessness 2020 Strategy. We welcome the opportunity to respond to the H2020S discussion paper.

CHFV believes that while targets to reduce homelessness are important, the goal must be to end homelessness. There is ample evidence that the co-ordinated provision of quality, permanent housing and support achieves this goal.

About CHFV

The Community Housing Federation of Victoria (CHFV) was formed in 1997, and is the peak body working on behalf of community housing organisations in Victoria. CHFV represents the views of its members to government and other relevant bodies, as well as providing advice, resources and training to the community housing sector. CHFV's vision is to support accessible, affordable and appropriate housing for all.

Community housing in Victoria is provided by a large and diverse range of not for dividend organisations. CHFV's member organisations manage in excess of 12,000 social housing tenancies across Victoria, with that number expected to increase by 50% within the next five years. As a result of State Government reforms, the community housing sector is highly regulated, with 38 organisations now registered under the Housing Act 1983. Nine organisations have achieved registration as Housing Associations, which are the State Government's designated vehicles for future growth in affordable housing stock, and 29 organisations are registered as Housing Providers.

While each sector has its own areas of expertise, housing and homelessness are part of a single continuum, and there is sometimes an artificial division of response and responsibility. A majority of CHFV's member organisations provide key services to the homeless, either as operators of community rooming houses or through the Transitional Housing Management Program (THM). This includes management of over 5000 rooming house and transitional housing dwellings in Victoria. CHFV believes we are ideally placed to make a substantial contribution to the development of the Homelessness 2020 Strategy.

Supply

The private market demonstrably fails to meet the real housing needs of low-income households. However, the continued failure of governments to address the chronic undersupply and limited availability of affordable rental housing has led to a private market response to the crisis: the proliferation of unregistered, unsafe private rooming houses. CHFV welcomes the Rooming House Standards Taskforce report this year and the State Government's response in adopting all 32 Taskforce recommendations; and we believe that these reforms should be taken further by legislating for minimum rental standards across all tenures, as has been done in South Australia.

Nonetheless, the primary underlying problem identified by the Taskforce remains unaddressed: there is insufficient affordable housing to meet the needs of low-income Victorians, and the private market is unable to meet this growing undersupply.

CHFV believes that homelessness cannot be significantly reduced unless the supply of affordable and available housing increases dramatically, and continues to increase at the same rate as Victoria's population growth. Affordable rental housing must be viewed by Federal and State Governments not as a social service but as essential infrastructure requiring significant and ongoing public capital investment.

There must be a diversity of housing options specifically targeted to the homeless, but this must be predicated on a clear recognition of the difficulties and expenses involved in development of inner-city housing, the higher costs of tenancy management of high-needs tenants, and the reality that low-income households cannot be housed on affordable rents without substantial subsidy. Nonetheless, it must be emphasised that many community housing providers share a common mission in seeking to address homelessness and would welcome incentives to enable them to provide housing for the most vulnerable and disadvantaged in their communities.

CHFV suggests that there is currently an opportunity to look at Nation Building projects to be considered for targeting to specific groups with support funding. We welcome recent announcements that the fixed 25% leverage requirement for capital funding of housing development projects will be reviewed, and we urge that new projects that specifically target low-income homeless people should be subject to a flexible leverage assessment.

Prevention and Early Intervention

As identified in the Commonwealth's White Paper on Homelessness *The Road Home*, prevention of and early intervention in homelessness are critical elements in "Turning Off The Tap".

(a) HEF

HEF has traditionally been used for a wide range of assistance including rent in advance, removalist costs, storage costs and purchase of whitegoods – all assisting in establishing a new tenancy – and rent arrears to prevent eviction into homelessness. With the combination of spiralling rent costs and ever-increasing numbers of homeless households seeking crisis assistance over the last five years, HEF providers have been forced to cut back on both the diversity and the per-household amount of assistance. This has led to HEF being spread so thinly that in many cases it is insufficient to create a positive outcome. The OoH 2007-08 Annual Report shows that the average HEF assistance was in the order of \$200, which is less than 20% of the cost of four weeks' rent in advance and less than half of a fortnight's rent arrears.

Many HEF providers are now adopting an outcome-oriented approach that means each HEF assistance is sufficient to achieve the purpose it is given for. However, the necessary result of this is that fewer households can be assisted. It must be emphasised that HEF for rent arrears or rent in advance is critical and highly effective in assisting households to retain or to access long-term housing. This is often overlooked, as many such households have low support needs and are unlikely to intersect with the support system.

(b) Crisis accommodation

There is currently inadequate provision of safe housing resources with which to assist people in crisis. CHFV supports a Housing First approach that aims to provide housing as quickly as possible for people presenting as homeless, but this must be underpinned by an adequately-funded crisis response that meets their immediate needs. Funded programs need to be more flexible and client-focused, and diversity and innovation in response approaches should be encouraged.

(c) Mainstream services

While responsibility for the prevention of homelessness should sit primarily with mainstream services, this must be backed by accountability requirements and adequate resources. Mainstream services must be provided with training in recognising and responding to homeless and at-risk clients, and there should be more social workers in all mainstream services. At heart, what is required of mainstream services is a change of culture so that the question being asked is “What role can we play in assisting this client to avoid homelessness or regain stable housing?” A successful example is the education that mainstream services have received in identifying and responding to family violence.

Additionally, mainstream services should be required to report against KPIs in reducing and preventing homelessness. Prevention and early intervention is a whole-of-community responsibility and should be addressed at the first point of identification, with that service having responsibility to ensure an adequate response (for example, successful internal referral to a social worker or external referral to another service or agency). Mainstream services should be required to actively assess for the risk of homelessness. One way to achieve this would be for housing experts to be seconded into mainstream services to help develop policies and procedures such as early warning triggers (when someone’s housing may be at risk) and protocols to assist in resolving the housing crisis or finding adequate alternative housing.

It’s a Government policy that no person should exit the care of mainstream services into homelessness. More thought needs to be given to how this can achieve effective outcomes for clients. For example, discharge to independent living should not be seen as a successful outcome if it fails to reconnect the person with their support networks, including family and/or community. Exit strategies and discharge planning should be a mandatory component of a client’s case plan and should be developed at an early stage; such an approach anticipates the difficulties a client may face after discharge and puts in place strategies to resolve these difficulties. The mainstream service should be required to assess the success or failure of these preventative strategies by following up the client well beyond discharge (say, four weeks); successful discharge could thus become a KPI. Effective planning may include a progressive exit process encouraging re-engagement with family or community prior to final discharge. However, the additional resources to enable services to meet these responsibilities is essential.

There’s a need for genuine partnerships between mainstream services and the HSS. Examples include the “H3 consortium” -- a partnership between Health, Housing and Homelessness services in the Western Metropolitan Region -- and HomeGround’s protocols with St Vincent and St Alfred hospitals. It should also be acknowledged that achieving such strong and effective partnerships is hard work and requires substantial resources.

One critical area requiring greater government commitment is in assisting clients in unaffordable private rental housing to find affordable housing solutions before they are

forced into homelessness. There are insufficient resources within Opening Doors to enable meaningful outcomes for households at risk due to unaffordable rents. Substantially increased funding of programs offering private rental brokerage should be coupled with responsibility for mainstream services to identify “housing stress” as a key indicator of households at risk of homelessness.

The SHASP program has demonstrated its success in supporting at-risk tenants to maintain their social housing. The demands on HSOs have increased both in workload and complexity, particularly in the cultural shift from a transactional to client-focused culture, and SHASP has become increasingly important in supporting the work of HSOs. There’s also opportunity for the SHASP model to be extended to other tenures.

Community education is an important element of prevention and early intervention – starting with the need to dispel the stereotypical image of the dishevelled homeless person. It’s vital to convey the reality none of us are immune from personal crisis and the risk of homelessness.

Client-centred focus

There is an urgent need across all funded programs to abandon a systems response in favour of a client-centred response. For example, THM funding guidelines that require turnover of tenancies regardless of the outcomes for tenants are not only inappropriate but run counter to the obligations of THMs under the Charter of Human Rights; and SAAP funding constraints that limit support to 13 weeks put pressure on agencies to reduce or withdraw support regardless of the client’s need. Responses should not be forced to fit within arbitrary systems time limits, as this inevitably leads to ineffective outcomes.

However, if programs are to adopt a client-centred framework, there are clear policy contradictions in retaining efficiency-based KPIs for program delivery. The performance of funded organisations must be assessed primarily on outcomes rather than efficiencies, and they must be given the programmatic flexibility to deliver these outcomes.

CHFV strongly supports the H2020S Discussion Paper’s emphasis on “Focus on the individual” and moving from assessing program outputs to assessing (and valuing) client outcomes. More particularly, CHFV believes that funding of HSS programs should be sufficient to resource an outcome-driven approach that meets demand.

More broadly, CHFV believes that program labels and categories have been overly definitive and have restricted the ability of organisations to deliver effective responses. A client-centred focus allows greater flexibility and innovation, so that support and housing are each tailored to suit the need and can be delivered through a range of service vehicles. This approach will build upon the excellent partnerships between housing and support providers and will encourage new and creative options that cross old boundaries.

Tenancy Management

There’s no doubt the THM Program faces severe challenges as it’s currently structured, including obligations under the Human Rights Charter; slow replacement of lost headleased properties and properties transferred to RGS; particular difficulties in

accessing and retaining suitable inner-city stock; and above all else, the very slow through-put due to lack of suitable exits. This latter issue is the single most pressing problem: there are insufficient appropriate long-term housing options – whether public, community or private rental – to meet current homelessness demand. Supply remains the most critical consideration.

Nonetheless, the Thomson Goodall research for HomeGround Services demonstrates that the THM Program does have a place in addressing homelessness and offers effective outcomes for particular cohorts. A strength of the program is that it has built substantial specialist tenancy management expertise within the sector. CHFV believes that while the THM Program should be retained, it should be significantly reconfigured so that the housing response is more readily tailored to the client's needs. Some clients may be best served by quick access to the current model of transitional housing that acts as a medium-term "holding pattern" until their long-term housing can be arranged – but the Departmental emphasis should be on effective assessment for allocation to TH and successful exit, rather than on an arbitrary rate of turnover of tenancies. A key point is that THM is not just about tenancy, it's about *tenure*.

Other clients may be better suited to a Housing First approach that seeks to place them directly into long-term housing, bypassing the TH phase; or that places them in a property that is nominally "transitional" with high-level tenancy management, but reverts to long-term housing once the household stabilises.

There also needs to be more alternatives, including A Place To Call Home (new build and spot purchase), the foyer and supportive housing models, and innovative approaches such as crisis accommodation that transitions into medium-term housing without the client having to move.

More sophisticated assessment of the most appropriate housing response for each client is needed, with a greater focus on the outcome. This also extends to the role of crisis accommodation, with a client-focussed response requiring greater flexibility in funded support periods.

CHFV recommends that State Government identify suitable opportunities for community housing organisations to take on the tenancy management of selected public housing properties, utilising the expertise and support protocols these organisations offer. This extends and builds on the Supported Housing Advocacy and Support Program, which several community housing organisations are already funded to provide. There's room for innovation in this regard - for example, community housing organisations undertaking the tenancy management of new public housing tenants made an offer under segment 1, with handover of tenancy management to Office of Housing after six months.

Waiting Lists

The current reform of the Segmented Waiting List (SWL) is welcome, and CHFV supports the principle that homeless and family violence applicants receive the highest priority in housing allocation. The proposed changes to the SWL will, however, have three significant impacts on the delivery of transitional housing. First, the waiting times for those who would have qualified under Segment 1 of the current system will increase substantially: recurring homelessness due to complex high support needs will no longer receive higher priority than "ordinary" homelessness. Second, those currently in transitional housing on Segment 3 (and for whom the waiting period for an offer is substantial) will be given higher priority, reducing a key bottleneck in THM. Third,

allocation to transitional housing will “fast track” clients into longterm housing, which means that the decision on who to allocate to TH vacancies becomes critical.

The integration of public and community housing waiting lists also offers a significant step forward. Integrated Housing Registers allow easier access to all those seeking secure and affordable housing, including homeless persons, by providing a one stop shop for applying for housing. However, there are conflicting objectives which must be carefully balanced. On the one hand, allocations to community housing should reflect the Government’s priorities to address homelessness and family violence. On the other hand, community housing organisations must maintain sufficient control over allocations to ensure that the integrity of their tenancy management and the viability of their business are not adversely affected. In this regard, the importance of mixed communities in social housing needs to be recognised and valued. International experience has shown that the concentration of those with complex needs in social housing developments leads to entrenched and intergenerational disadvantage.

The Department’s consultation with the community housing sector on SWL reform has been exemplary. CHFV looks forward to a similarly effective consultative approach regarding the common housing list.