

16 March 2021

Professor David Hayward
Chair, Independent Review Panel
Social Housing Regulation Review (SHRR)
via email: info@shrr.vic.gov.au

Dear Professor Hayward,

RE: Response to the Social Housing Regulation Review interim report

I am pleased to provide this submission to you and the Review Panel, on behalf of Uniting Vic.Tas (Uniting). This follows a previous submission we provided to the Panel in September 2021. Our submissions draw from our practice experience operating 13 dedicated homelessness programs across Victoria in rural and metropolitan areas, and our services for people experiencing or at risk of homelessness (including emergency relief, mental health, family violence and alcohol and other drug programs).

Uniting also manages (on behalf of Uniting Housing (Vic) Ltd, a registered provider) hundreds of social and affordable homes across Victoria as well as retirement villages in southern and eastern Melbourne and Gippsland. Uniting is also working hard on its ambition to *Make Housing a Priority* with the construction of hundreds of new social housing homes planned, which we hope will be supported with Victorian government funding. Therefore, Uniting is very interested to see regulation reforms which support the growth of supply through the community housing sector.

We commend the Panel's work and its comprehensive interim report. We note this review is being undertaken alongside other key work in the housing and homelessness area at state and national levels, including the development of a 10-year strategy for social and affordable housing in Victoria, the review of the National Housing and Homelessness Agreement, and several homelessness inquiries. We ask that these pieces of work build on and support each other to collectively improve outcomes for people in housing insecurity.

Overall, Uniting supports the findings of the Panel's interim report as relevant and important considerations to inform social housing regulation reform in Victoria. We note feedback from the social housing sector that there must be adequate resourcing and support for the sector in order to meet additional regulatory demands.

Uniting believes that affordable, safe and secure housing is an essential human right that underpins a person's capacity to live a dignified, healthy and meaningful life within their community. We appreciate the opportunity to share our views on social and affordable housing in Victoria based on our policy and practice experience.

Uniting's feedback on the interim report

Tenant/renter at the centre and tenant/renter empowerment (Chapters 1 & 3)

Uniting believes that everyone has the right to have a meaningful say in the services they use and the policy decisions that impact their lives. We are strongly committed to partnering with consumers across

our operations. Our staff and consumers work together as equals to improve service planning, design, delivery, monitoring and evaluation.

Our approach is human rights-based, aligning with the Universal Declaration on Human Rights (specifically, rights 3-7), and is grounded in the following additional principles:

- Safety
- Listening and learning
- Respect
- Inclusion
- Purposeful
- Shared ownership.

We have created internal processes for people who have accessed Uniting services in the past to become lived experience consultants, who can then share their expertise, lived experience, and advocate for other consumers. These consumer consultants play a range of roles, including leading working groups, supporting interview panels, co-facilitating training, and providing advice on policy and communications documents.

Part of a transformation of housing and related services requires a change in the way services are designed. Uniting recommends the adoption of genuine, ongoing partnership with people experiencing housing stress and homelessness in every part of the strategy process – policy and program planning, design, implementation and review.

We support the Panel’s proposals (1.1, 1.2, 1.3). In particular, Uniting practitioners express strong support for the development and promotion of a charter outlining service standards renters can expect from their public/community housing provider. This is seen as essential for empowering renter and reducing information asymmetries, by ensuring renters and residential rental providers clearly understand their rights and responsibilities. We believe there should be accountability for residential rental providers around the charter, if renters feel the service standards are not being met.

Overall, we believe there is a significant need for increased consumer engagement and renter voice in social housing programs across Victoria, and we would be very interested to share further information about our work in this area with the Panel.

Tenancy sustainment (Chapter 4)

Uniting is interested to read the additional work on support services that has been commissioned by the Panel. As an organisation providing both tenancy management and housing support, we understand the complexity of this work and the importance of both roles. However, we are aligned with others in the sector in our view that these roles must be kept separate and cannot be combined, even when delivered through the same organisation.

Our view is that case management and wraparound supports should be made available to all people in social housing who need them. Through our work in both tenancy management and housing support programs, we often see the same clients in our programs over time – if someone loses their Uniting tenancy, they often need to access housing supports and return through Uniting’s homelessness entry point. We support the Panel’s proposal of a ‘no evictions into homelessness’, but it will be vital that this is appropriately resourced and supported – and that sufficient accessible and affordable housing stock is available, especially in regional and rural areas where housing options and providers may be limited.

Our preferred approach to housing and homelessness supports is the “Housing First” model, which provides vulnerable people with safe, ongoing housing, after which support is offered by a multidisciplinary team to address the risk and trigger factors contributing to the vulnerability. While there is a relatively high financial cost compared to other programs, Housing First is ideal for people who have experienced long-term homelessness, mental health or significant trauma. International evidence demonstrates the effectiveness of this model.¹

¹ [Researches - Housing First Europe Hub](#)

Uniting has experience delivering two programs based on the Housing First model, (i) Homelessness to a Home (H2H) and (ii) Street to Home (S2H). Both programs provide multidisciplinary support to consumers experiencing significant complexity, however the way these supports are accessed is different – H2H uses a referral model to external services, while S2H involves an integrated multidisciplinary team which can provide wraparound supports within the team. This involves two sub-teams:

- Supportive housing teams consist of staff with a range of complementary skills and relevant disciplines, who coordinate with assertive outreach teams to provide wrap around support to maintain tenancies once rough sleepers or homeless people have access to housing²
- Assertive outreach is an active and persistent approach by workers to find and engage with rough sleepers or homeless people where they sleep or frequent in order to establish a relationship of trust and provide the information and practical support necessary for them to transition from homelessness to stable housing and social reconnection.³

Further detail on the S2H model is provided in Appendix A.

Consistent feedback from our practitioners is that these programs and the Housing First model are effective and renter centred. While we do not have substantial service data to draw on yet (as the programs are relatively new), outcomes data to date supports this.

The vast majority of our supported tenancies are successful. Housing First services are deemed to be a success if they meet or exceed a tenancy success/maintenance rate of 80%. H2H, with the support of our case coordinators, is currently on a rate of over 97% successful. This includes one consumer who was incarcerated and signed the exit form to relinquish his property, so if we exclude this individual, the current success rate is over 98%. In our experience, the cost to government of homeless people accessing housing entry points for emergency housing – as well as their higher engagement with police, hospitals, etc. – is far higher than a continued investment in a supported housing model that works, such as S2H and H2H. Our practitioners report that the S2H program has only experienced 3 tenancy failures in its five years.

One of our practitioners says:

"Having worked with [both] programs with Uniting I've seen how effective the Housing First model is. We've housed a great many complex consumers facing extraordinary challenges and complexities, and yet – with support to maintain housing - there's an incredibly low rate of tenancy failures.

These numbers speak volumes about how effective Housing First is as a model when coupled with adequate support, so I would strongly support the recommendation that the Victorian Government expands programs like these across Victoria."

However, it is important to note that this model works best when there is flexibility in the type of support that can be offered and when there is no fixed end date for the support. This creates barriers for program funding and time commitment. Every consumer is different, and for some – after a year – we are only scratching the surface, working through the trauma of homelessness, distrust of services, willingness to confront barriers (mental health, substance use etc.). At Uniting, we have case coordinators in H2H who will be completing the 18 months of support for some consumers later this year. Unfortunately, some consumers will need longer than this, and it is concerning that in some cases Uniting will have no option but to 'step away' before our consumers are ready for us to do so.

On the other hand, S2H model incorporates flexible brokerage and long-term case management without a fixed end date. While the level of intensity of support and frequency of contact may vary for each client, flexibility within the program allows workers to case managers to tailor support to the individual needs and preferences of the person.

² Department of Families, Fairness and Housing. 2021. *Victoria's Homelessness and Rough Sleeping Action Plan: Supportive Housing Teams program guidelines.*

³ Department of Families, Fairness and Housing. 2021. *Victoria's Homelessness and Rough Sleeping Action Plan: Supportive Housing Teams program guidelines.*

Another difference between the two programs is in the way that wraparound supports are sourced. Through the S2H program Uniting employs an internal multidisciplinary team, and feedback from our practitioners suggests this is more effective than the external referral approach in H2H. A practitioner remarks:

"Street to Home's multi-disciplinary team is amazing and a similar team would be of tremendous benefit to H2H consumers rather than relying on external referrals. H2H have particularly struggled to make any inroads with Mental Health, find that a lot of attempted referrals – depending on the triage worker – can be pushed back or even met with disdain!"

We realise that mental health is an area that is over-subscribed and under-resourced, but our attempts to refer even extreme cases of mental health decline are usually met with a nonchalance that we're often surprised by. Having a mental health clinician, with their associated experience and contacts, can streamline this process greatly. In addition, their contributions to team meetings, interventions during home visits or consumer drop-ins is invaluable.

Another incredible resource to the H2H team would be an Occupational Therapist, being able to complete multiple functional assessments, supporting NDIS applications, etc. Finally, a Case Coordinator with AOD background for counselling, and referrals to detox/rehab facilities, would be of huge benefit."

Dispute resolution (Chapter 6)

The experiences of Uniting practitioners regarding dispute resolution align with the Panel's findings in the interim report – that the current dispute resolution systems are complex, fragmented, and difficult to understand. This presents significant barriers for renters in raising concerns they have and seeking resolution. Practitioners also report challenges and inconsistencies with the different regulatory approaches for public and community housing.

We strongly support the Panel's recognition of the need for improvements and streamlining of dispute resolution processes. While our view is that a singular body such as a Social Housing Ombudsman or Commissioner would be the most straightforward from a renter and practitioner perspective, we understand the Panel's discussion of relative cost and that there would continue to be other bodies involved. Regardless of how this mechanism is established, we strongly support the Panel's call for a 'no wrong door' approach to support renters and provide systemic oversight across all forms of housing for vulnerable people.

Affordable housing (Chapter 9)

Housing affordability is one of the most significant social issues facing Australians these days. We firmly believe that without addressing the shortage of social and affordable housing stock, there is a limit to the impact that homelessness and social housing programs can have. The fundamental solution to the challenge of housing stress and homelessness is long-term commitment and investment to build and provide a wide range of affordable, safe and secure housing options that allow all Victorians to lead a dignified life in stable housing communities.

But the Victorian Government does not need to shoulder this mammoth task alone. Commitment to annual, increasing social and affordable housing stock that meets the demand across the state that sits alongside strategies to increase adequate affordable housing options in the private rental and home ownership markets should form key steps in the government's policy.

Uniting supports the Panel's proposal to extend accountability and regulatory measures to affordable housing dwellings managed by private or unregistered providers, particularly in instances where they received a government subsidy in establishment or maintenance.

Prospective social housing tenants/renters (Chapter 18)

Half of the almost 50,000 people on the Victorian Housing Register are eligible for priority access yet can remain waiting for years. It is estimated that tens of thousands of additional people are eligible for social housing, but do not apply because the wait time is excessive.⁴

Failure of the system to provide adequate social and affordable housing forces people to live in private accommodation that often do not cater for their wellbeing or socio-economic needs. Our practitioners note barriers faced by vulnerable and disadvantaged in private rental accommodations, including difficulty accessing suitable properties, maintaining appropriate support services and deteriorating financial and wellbeing circumstances.

Consequently, a large proportion of people accessing homelessness services in Victoria enter from the private rental or other housing markets.⁵ The best form of support is therefore prevention - assisting people to remain in their homes and established communities.

We agree with the Panel's proposal to introduce active waiting list manager and greater support for people at risk while they remain on the housing register. Early intervention program like Private Rental Assistance Program (PRAP) and Tenancy Assistance and Advocacy Program (TAAP) provide good assistance in reducing risk and preventing homelessness. However, our practitioners note that people need to be on the verge of homelessness to access these services.

As noted above, similar to tenancy sustainment support, early intervention programs work best when they incorporate ongoing and flexible services that support people to address other complex and compounding vulnerabilities they face. The needs of every household are different and working through the trauma of housing stress, homelessness, distrust of services and willingness and capacity to confront barriers take time and flexibility in programs. The aim should be to give households a genuine chance to maintain their tenancies, limit arrears and most importantly, avoid homelessness.

Our practitioners also note that when supporting private renters at risk, "simply having Uniting as a support service" on applications can disadvantage them and hinder successful outcomes. At Uniting, we already work with property managers to educate them and create awareness on the particular needs of vulnerable consumers and the ethical responsibilities of both the residential rental provider and agent. However, this work is hindered by limited policy and regulatory back-up in the sector, and currently depends entirely on the relationships we hold.

Therefore, Uniting supports the Panel's proposal to introduce a Code of Practice for residential rental providers and property managers that outlines best practice principles and guidance on how to work with vulnerable people in private rental industry.

Thank you for the opportunity to provide our response to the report. If you would like more information please contact Uniting's Manager, Advocacy and Public Policy, Thomas Johnson on 0400 315 446 or via email at Thomas.Johnson@vt.uniting.org.

Yours sincerely,



Silvia Alberti
A/Chief Executive Officer

⁴ Department of Health and Human Services. 2018. [Victoria's Social Housing Supply Requirements to 2036](#). Accessed 15 Mar. 2021.

⁵ Australian Institute of Health and Welfare. 2020. [Specialist homelessness services annual report 2019-20](#). Accessed 15 Mar. 2021.

Appendix A: Uniting's *Street 2 Home* program

Background and rationale

Street 2 Home (S2H) assists rough sleepers to secure housing and additional support, working with consumers to identify their goals and help them to achieve them.

The S2H team works alongside consumers to identify housing options, including applications via the Victorian Housing Register. S2H provides an outreach response to rough sleepers, providing material aid and support while they are rough sleeping.

Support continues once consumers have secured suitable long-term housing, via the S2H Supportive Housing team. This team works with consumers on issues that may impact their ability to maintain a tenancy, such as independent living skills, mental health concerns and substance use.

The S2H Program is funded by the Victorian Government, under the Department of Families, Fairness and Housing (DFFH). S2H is currently providing services and support to consumers in the Ballarat, Hepburn, Moorabool, Golden Plains, and Pyrenees municipalities.

Based on State estimates of people sleeping rough and applying this percentage of population to the municipality of Ballarat, it is projected that approximately 70 people within our immediate community are sleeping on the streets, squatting, or sheltering in sub-standard accommodation each night.

S2H identifies that in working with a rough sleeping population, there is a clear need for flexibility to be responsive to a cohort whose significant history of trauma and transience can result in disengagement and/or housing breakdown. In this regard, an assertive response, including rapid re-housing provides the ability to engage participants back into actively receiving support. Once participants are stabilised in long term housing, additional supports and post-settlement support are introduced to continue to enhance health outcomes and improve community connections.

An important part of the work of S2H is building relationships with those sleeping rough. This then often opens the door to being able to assist further. Workers build relationships by:

- Providing material aid to assist with a person's comfort, while they are sleeping rough
- Helping with temporary accommodation to get people off the street
- Assisting consumers with issues that can be resolved more quickly – such as access to dental services, medical appointments (doctors etc.), new glasses (optometrist), and legal assistance (if needed)
- Having a plan to find housing, making sure that the consumer understands what has to be done, how long it might take, keeping them involved in the process, and updated as to what is happening.

Through engaging people identified as rough sleeping, where they are located and with the clear intention of ending their homelessness, the Assertive Outreach program provides intensive consumer support for the purposes of working towards consumer-centred goals, often resulting in long term and sustainable housing.

Program overview

S2H supports highly vulnerable individuals experiencing homelessness. Vulnerability is assessed using the VI-SPDAT, which provides an acuity based on risk factors such as chronic homelessness, trimorbidity and age. This consumer group typically has the following characteristics:

- Single
- Predominantly male
- Aged over 25
- Long-term housing instability, transience, and homelessness
- Psychiatric disability/mental illness
- Drug or alcohol dependence
- Frailty (inc. frail aged or ABI)
- Inability to access services due to barring, challenging behaviours, or cultural issues
- Frequently a victim of violence, standover, and exploitation.

In addition, the consumer group is likely to have a higher incidence of:

- Physical and/or intellectual disability
- Poor physical health and premature ageing
- Alcohol or trauma related brain injury

- Social isolation and disconnection from the human services support system
- Long term and often inter-generational poverty
- Childhood abuse or neglect
- Poor literacy and numeracy skills
- Long-term experience of being judged negatively and excluded by organisations and individuals because of unorthodox behaviours and appearance.

Street 2 Home teams operate within two sub-teams:

- Assertive Outreach
- Supportive Housing.

Assertive Outreach

S2H offers holistic and intensive case management support. Support domains include:

- Housing and homelessness
- Mental health
- Physical health
- AOD (Alcohol and Other Drugs)
- Family violence
- Legal
- Financial
- Employment
- Education
- Social, family and community connection
- Anything else important to ending the consumer's homelessness/ improving their health.

Case management in S2H is not a linear process and is done at the consumer's pace. As many of the S2H consumers have experienced systemic discrimination and trauma, the relationship between Worker and consumer is pivotal to the case management process. Workers hold their consumers in unconditional positive regard and seek to empower their consumers by fully involving them in the case management process and being as transparent as possible. Workers seek to be strengths-based, and use a power with, rather than a power over approach.

A consumer may receive an offer of housing from the Department of Health & Human Services (DHHS), be offered community housing (e.g., Centacare housing, Sunways, etc), be approved for a private rental, or head-leasing arrangement. The Assertive Outreach (AO) worker will assist the consumer with the accepting (or rejecting) an offer of housing.

Once a consumer has been housed, and a period of settlement has occurred, the Assertive Outreach worker (case manager) will refer to the Supportive Housing team for ongoing case management.

Supportive Housing

The Supportive Housing Team comprises staff with a range of complementary skills and relevant disciplines including, mental health clinicians, occupational therapists, and drug and alcohol workers.

The role of the Supported Housing Team is to support a consumer with the transition from chronic homelessness and rough sleeping to placement in longer term accommodation. This is in recognition of people with histories of chronic homelessness and rough sleeping often struggle with loneliness, disability and ill-health, poverty, exploitation by others, self-destructive patterns of behaviour and lack of living skills. To be effective, longer-term support needs to address people's unique experience of homelessness and the individual health and wellbeing factors that have hampered previous attempts to resolve their homelessness. Primarily, the Supported Housing Team works with the person to sustain their housing and work towards their desired goals.

The same case management approach and principles apply to the Supportive Housing team as the Assertive Outreach team (above).

The scope of support provided is broad and specifically tailored to the person. The support can range from, support to establish a home, for example, learning to attend to self-care and domestic tasks, through to specific clinical interventions addressing people's primary and mental health issues. Support can also range in depth and intensity, depending on the person's needs. This can mean that at different times the person may be able to live in the community with minimal supports or may have been successful referred to other community support services. It is expected that the need for services

delivered by the teams will decrease over time as holistic supports, improved integration with community and mainstream services and consumers make progress in their recovery.