



Homelessness Australia
Creating a framework for ending homelessness

Submission in response to the
regulation impact statement for the
national regulatory system for
community housing providers

January 2012

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Our organisation

Homelessness Australia is the national peak body representing providers of direct services to people who are experiencing homelessness. We work to prevent and respond to homelessness in Australia and advocate on behalf of our members and the homelessness sector to create a framework to end homelessness. Homelessness Australia seeks to improve community awareness and understanding of the issues facing the 1 in every 200 Australians who are homeless.

Homelessness Australia advocates for people who are homeless, aims to represent the interests of more than 1500 homelessness assistance services, and contributes to policy development and the evaluation of Australia's homelessness service system.

Homelessness Australia works collaboratively with homeless people's associations, homelessness assistance services, State/Territory homelessness peak organisations, national peak organisations from other sectors, governments, business and the broader community to achieve these objectives.

Homelessness Australia represents the single men and women, families, young people and women escaping domestic violence who access the diverse support and advocacy services provided by our founding members.

Background and context

The National Housing Supply Council's *State of Supply* reports, the experiences of Homelessness Australia's member services in trying to access affordable housing to help their clients exit homelessness and what we know at a national policy level tell us that there is a clear, pressing and urgent need to expand the stock of affordable housing in Australia.

For our organisation and our stakeholders, increasing the stock of social housing is critical if we are to meet the target of halving overall homelessness by 2020, as the private rental market continues to be an unrealistic option for many people who are experiencing homelessness especially those who are totally reliant on income support. Financial incapacity, discrimination by landlords and property managers and the lack of recent rent references are just some of the barriers that people experiencing homelessness face to entering the current private rental market characterised by low vacancy rates, high median prices and strong competition for properties.

Homelessness Australia acknowledges the work that has been done by both Government and housing peak bodies to re-frame and re-contextualise the need to meet housing challenges in twenty-first century Australia within a housing affordability framework.

The replacement of the Commonwealth-State Housing Agreement with the National Affordable Housing Agreement in 2009, the establishment of the Housing Affordability Fund and the phased roll-out of the National Rental Affordability Scheme are examples that highlight this important change in contextualisation and focus.

Reforming the regulatory framework within which providers of community housing operate is another important component of the process of meeting the housing affordability crisis Australia is facing head on.

As we noted in our previous submission in response the Discussion Paper released by the Australian Government in April 2010, Homelessness Australia welcomes the growth of the not-for-profit housing sector and the commitment by the Australian Government to assist community housing providers to grow their housing stock.

Where we may differ from some other submitters is in our belief that Government still has a central role to play in fully funding the cost of housing for people on very low incomes who cannot support themselves in the private rental market, especially those who are completely reliant on income support and those who are experiencing homelessness.

Key points

- **Homelessness Australia supports the expansion of the Not for Profit (NFP) housing sector because it will provide scope for the expansion of social housing dwellings for Australians on low-moderate incomes who cannot afford to access or sustain tenancies in the private rental market.**
- **Homelessness Australia also believes that Governments still have a role to play in the direct provision of fully funded public housing and accelerating stock transfers to Housing Associations should not be done on the basis of 'cost-saving' alone.**
- **Regardless of the model of regulation adopted, Homelessness Australia's primary concern is to ensure that community housing (and public housing) remains accessible to people who are experiencing homelessness and who, without a robust social housing sector, would otherwise be homeless.**
- **Homelessness Australia notes that the key assumption is that leverage is an essential feature of any successful growth model. This has both positive and negative implications for people that the services we represent/support. These are discussed below.**
- **Homelessness Australia supports a robust and thorough review of the leverage modelling and sufficient flexibility within the rules to ensure that people experiencing homelessness and people who are wholly reliant on income support are not 'locked out' of community housing as the sector expands.**
- **Homelessness Australia believes that the preservation of the diversity of the community housing sector is an important consideration. We do not wish to see smaller providers who deliver housing for niche groups with particular needs squeezed out or subsumed by larger housing associations and companies in a tiered system.**

- **A major concern for Homelessness Australia is ensuring that tenants' rights are protected in the national regulatory system.**
- **Homelessness Australia believes there are opportunities to strengthen tenants' rights and protections as a national regulatory system provides for greater consistency in this system.**
- **Homelessness Australia acknowledges that with tenants' rights comes the need to balance these with obligations and responsibilities to housing providers around maintenance of properties and meeting the tenant profile desired by particular providers.**
- **Homelessness Australia supports models of rent setting based on a proportion of tenants' disposable incomes. To avoid housing stress, capping this at 25% is the desired option for the people we represent. This will ensure that a proportion of new community housing stock remains accessible and affordable for people experiencing homelessness and people who are wholly reliant on income support.**
- **Homelessness Australia endorses the Community Housing Federation of Australia's position that Option 2, to establish a nationally consistent regulatory system which is enacted in one jurisdiction and adopted or applied by other jurisdictions be pursued in preference to option 1 which is to maintain the status quo notwithstanding the fact that there is a need for more detail about certain components of its operation.**
- **Homelessness Australia believes it is important to ensure that parts 1 and 3 of the national community housing standards relating to tenancy management and tenants' rights and participation are protected or enhanced in a national regulatory system.**

General comments about the future of social housing

Homelessness Australia is pleased to be able to provide some general comments about the future of the social housing sector in Australia.

It is well documented that the private rental market continues to fail to meet the needs of and be accessible to a proportion of the community. For this group social housing provides a critically important safety net that prevents people from experiencing homelessness by providing dwellings with security of tenure at a comparatively low cost.

Homelessness Australia is aware that the Australian Government is intent on facilitating the expansion of the not for profit housing sector to ensure that a significant proportion of social housing stock is managed by community housing providers over the coming decades.

Homelessness Australia regularly hears from our members and from people experiencing homelessness about the difficulties of getting into and sustaining a tenancy in the private rental market. For this reason, as we have stated previously Homelessness Australia is therefore both encouraged and supportive of any strategy that will progressively expand the social housing sector and increase the pool of social housing stock in Australia.

That said, it should be noted from the outset that Homelessness Australia believes that Government has a responsibility to fully fund the cost of providing housing (public housing) for people whose needs are unable to be met in the private rental market and for whom home purchase is not a realistic option.

Homelessness Australia again notes that a key assumption throughout the April 2010 document was that leverage is an essential feature of any future growth model for social housing.

The ability to leverage existing assets is obviously pivotal to enabling housing associations and housing companies to grow their asset base (housing stock). This is positive because it will stimulate the construction of new dwellings quickly and drive growth in the not for profit housing sector. Assuming this is not matched by commensurate sell-offs by public housing authorities, this should result in Nett growth in social housing dwelling numbers which is vital if we are to meet the target of halving homelessness by 2020.

Homelessness Australia expresses concern that if all future growth is targeted at community housing and housing associations, this will have significant implications for public housing and for the most disadvantaged in our society who may be indefinitely reliant on public housing.

We would advocate for continued investment by the Commonwealth for the provision of a substantial number of new public housing dwellings each year on an on-going basis well beyond the life of the social housing economic stimulus package.

In some jurisdictions targets have been set for a proportion of dwellings in new developments to be set aside for 'affordable housing'. This is a useful strategy as it enables key workers on moderate incomes to have the ability to rent dwellings that meet their needs in locations that are close to employment centres and essential services.

As our major cities grow in population it is likely that medium and higher density housing in Brownfield and Greyfield development zones will become increasingly necessary. Homelessness Australia believes that social housing and subsidized private rental dwellings must make-up a significant proportion of new dwellings in these zones.

Homelessness Australia believes there is a need to revitalise social housing in Australia. The tenant profile of public housing has arguably become too narrow and as the proportion of social housing dwellings held by community housing providers increases we are hopeful that the tenant mix may change and we will see more working people on low to moderate incomes in social housing while still ensuring that people who are not in a position to sustain themselves in the private rental market (even in NRAS properties and other subsidised private rental dwellings) can access social housing in a timely manner.

From our perspective however it is also important that future construction of social housing occurs in so called 'mixed tenure' communities to avoid the phenomenon that has arisen historically in some Australian cities such as Sydney and Adelaide where large scale public housing estates were established in areas that were on outer suburban fringes and not well located in terms of access to services, employment and reliable public transport.

Homelessness Australia believes there are a number of advantages for our client group that will flow from the expansion of the community housing sector. Community housing providers are renowned for offering greater opportunities for tenant participation in decision making about tenancy and property management and other housing related matters than either public housing or private rental. Homelessness Australia also believes that the often diverse tenant profile that community housing organisations are comprised of has demonstrated that it can accommodate a good mix of tenants including people exiting homelessness.

In addition, Community housing provides an ideal exit point from homelessness for many people as providers are often well linked in with community services that people need to make the transition to independence after a period without secure housing

While we are supportive of the expansion of the not for profit housing sector and we acknowledge that leverage is a critical means by which the pool of social housing stock can be increased more quickly than would be the case through non-leverage models (such as a steady or indexed operational subsidy), we have some concerns about the implications of this for people on very low incomes and those who are reliant on income support.

We note that community housing models that calculate average weekly rentals on a proportion of a person's available disposable income benefit the most disadvantaged by act to alleviate housing stress.

The maximum proportion of income that should be allocated to rent for clients reliant entirely on income support to avoid housing stress is probably 25% given that many in this group are allocated less than \$40 per day in 'benefits'.

These could be at risk if providers are compelled to service debt and replace rent setting arrangements based on a proportion of income with NRAS style rent setting based on a proportion of market rent.

In addition to utilising leverage against assets to ensure strong growth within the social housing sector, Homelessness Australia believes that we need to guarantee that the pool of stock available to the most financially disadvantaged also continues to expand. One of the risks we can foresee should future growth of the sector be entirely based on a leverage model is that social housing may become increasingly unaffordable for our client group, especially young and older people who are more likely to be on a fixed income and/or reliant entirely on income support.

We believe it is essential to ensure that whatever growth model(s) are pursued, the pool of social housing stock that is affordable to the most disadvantaged in our community, especially people who are experiencing homelessness is increased commensurate with the increase in the total pool of social housing stock. Put simply, leverage makes it more difficult and less attractive to house tenants with the least financial resources because of the inherent need to repay the debt leveraged against the housing assets which may either force rental prices up or diminish the proportion of dwellings that a provider is able to allocate to the most disadvantaged.

Homelessness Australia supports a robust and thorough review of the leverage modeling and sufficient flexibility within the rules to ensure that people experiencing homelessness are not 'locked out' of social housing indefinitely.

Notwithstanding the concerns we have about growth models based purely on leverage, we welcome strategies to enable not for profit housing providers and housing companies to expand their housing stock and construct new dwellings as quickly as possible.

The easing of development restrictions and the streamlining of application processes that enabled the stimulus properties to be constructed rapidly demonstrate that it is possible for reforms at a policy level to make a difference at a practical level notwithstanding the fact that there are capacity constraints within our construction sector.

The Need for a national regulatory framework

We welcome the national regulation of the not for profit housing sector and believe there are opportunities that exist to further streamline assessment and approval processes to enable the sector to expand.

Homelessness Australia believes there is a need for a national regulatory system for community housing providers.

We believe that the second option presented in the *Statement of Options* in the Regulation Impact Statement will be flexible enough to accommodate the needs of existing and emerging not for profit housing providers and housing companies.

That said, there is a need for greater clarity and more detail on aspects of the national regulatory system such as the evidence guidelines, binding instructions and statutory manager.

We are hopeful that the national regulatory system will enable housing providers to take full advantage of opportunities that exist for the sector to grow in the coming years to be a major player in the provision of social and affordable housing in Australia.

We see the expansion of community housing as a vital component of the overall approach to reducing homelessness in Australia which can only be achieved if exit points (affordable housing) are increased.

Homelessness Australia notes that reforming tenancy legislation and achieving national consistency around tenancy databases were flagged in the Australian Government's White Paper on Homelessness, *The Road Home*.

While the Regulation Impact Statement notes that public housing is excluded from the NRS, there is arguably a need for greater consistency around tenancy management and tenants' rights and obligations cannot be pursued nationally for tenants in all types of rental tenure.

A core function of a national regulatory system should be to enable housing providers to grow and build their capacity while at the same time provide a framework for managing and mitigating risks.

The national regulatory framework should be a positive and enabling one that supports housing providers who wish to do so to pursue appropriate and targeted growth strategies while at the same time ensuring that medium and smaller providers, particularly those specialised in housing particular client groups are sustained.

Homelessness Australia is anxious to see that the current diversity of the community housing sector is preserved as the proportion of housing stock and the number of social housing dwellings owned and managed by community housing providers increases.

Homelessness Australia believes there is a need for national consistency around the transfer of housing stock from public housing authorities to community housing organisations. The national regulatory system could provide an opportunity to mandate percentage targets for stock transfer by specified dates with KPIs to ensure the transfer of stock is monitored and can be measured. For example, New South Wales has set a target for the transfer of up to 75% of dwellings to the community housing sector but there does not appear to national consistency around this target.

Homelessness Australia believes there is an opportunity to enshrine consistent targets and time-lines for stock transfer in the national regulatory framework, its guidelines or in legislation.

What a national regulatory system should aim to do

Homelessness Australia believes the implementation of a national regulatory system for community housing should:

- Provide a positive and enabling framework for growth and the management of risk.
- Ensure that best practice is reflected in the legislation in terms of the role and function of the registrar and reporting on its performance.
- Encourage providers to meet codes of practice through incentives, using punitive sanctions as a last resort or only in the case of severe regulatory breaches or failure.
- Ensure that small and medium sized providers and co-ops can sustain themselves in a tiered system.
- Ensure that housing providers are afforded opportunities for rent setting that enable them to be sustainable.
- Enable Aboriginal Community Controlled Housing Organisations to build their capacity.
- Afford Aboriginal Community Controlled Housing Organisations similar growth opportunities to other housing providers.
- Effectively regulate asset management and dwelling upkeep.
- Be overseen by a body, Department or agency that is separate to the Department responsible for funding social housing.
- Strengthen tenancy management.
- Provide greater consistency around tenants' rights and responsibilities of both tenants and property managers.
- Enhance tenants' rights.
- Ensure tenants on low incomes and who are wholly reliant on income support can continue to access community housing as the sector expands.

Homelessness Australia's preferred option

Homelessness Australia supports **option two** in *Element 3- Statement of Options* in the Regulation Impact Statement. This would:

'...establish a national regulatory system which is enacted by one jurisdiction and adopted by or applied to other jurisdictions...' (Regulation Impact Statement, page 8).

Homelessness Australia supports the second option in preference to the status quo. We believe it will provide greater consistency for housing providers, housing applicants and tenants and will provide increased opportunities for providers to grow the pool of housing stock that they own/manage.

We are hopeful that the three tiered system proposed will offer sufficient protection for smaller and medium term providers and those who provide properties to specific groups who face housing disadvantage in the private rental market (such as people with disabilities and people living with mental illness).

On balance it appears that the benefits of moving to a national regulatory system hosted by one jurisdiction outweigh the costs. That said, there is a need for more clarity and more detail about some elements of the proposed regulatory system such as evidence guidelines, binding instructions and dispute resolution procedures.

Protecting the interests/rights of tenants in community housing

Protecting the interests of tenants in community housing is an important issue of concern for Homelessness Australia. We represent the interests of the diverse homelessness services sector which provides accommodation and support to some of the most vulnerable men, women young people and children in Australia, those who are experiencing homelessness and those at risk of becoming homeless.

For the majority of these clients, social housing, be it public or community housing is the only realistic housing option that can provide some security of tenure upon exiting homelessness.

We know that there are some 50,000 applicants on community housing waiting lists at the present time and while this is significantly less than the number of people waiting to access public housing, it presents significant challenges for both prospective tenants and housing providers. Of the 50,000 waiting to access community housing, just under half were deemed to be high needs households and in 2008/09, 75% of new allocations in community housing were to tenants in greatest need¹.

These figures underscore the importance of community housing as a significant provider of safe and secure housing to disadvantaged households including people experiencing homelessness and those who are at risk of becoming homeless.

Community housing can be an excellent option for people exiting homelessness because many providers have strong connections to their local community and offer tenants much greater opportunities for decision making on management and tenancy issues than either private rental or public housing.

Community housing tenants are currently afforded the same protections as other tenants in rental accommodation under residential tenancies legislation at a State and Territory level.

This includes having access to residential tenancies tribunals and appellate bodies who can resolve disputes, protections not afforded to boarding/rooming house tenants.

¹ Australian Institute of Health and Welfare, Housing Assistance Data Development Series: Community Housing 2008/09, 28 January 2010.

² Bleasdale, M Supporting the Housing of People with Complex Needs, AHURI Research and Policy Bulletin,, November 2007; Gronda, Hellene Dr, What Makes Good Case Management Work? Bringing Together the

Homelessness Australia understands that the provision for appeals processes and decision making on housing allocations, referrals and rental calculations is currently a State/Territory responsibility.

We trust that more information will be provided about how these will operate in a national system will be forthcoming.

Homelessness Australia would want to ensure that the rights and protections that community housing tenants are currently afforded under State/Territory legislation and guidelines are not diminished in a national regulatory system. Given that the growth of the sector looks likely to be primarily driven by leverage models, there will be a need to ensure that tenants are provided with assurances that they will not end up homeless if a housing provider is unable to repay debts leveraged against housing stock or if an organisation fails for other reasons.

Keeping providers tenant focused in an era of growth

A number of providers, in particular those who specialise in the provision of housing and tenant support services for client groups with higher needs can arrange for the coordination of mental health, primary health and social services for tenants with moderate to high needs. This makes community housing an attractive option for people exiting homelessness who need support packages to assist them to stabilise their situation and sustain their tenancy.

Good local partnerships, community connectedness and close relationships between provider and tenant are some of the key strengths underpinning the community housing model. There is evidence to suggest that constructive local partnerships and good working relationships between housing and support providers lead to improved outcomes for tenants with high needs².

As the sector grows in size and scope and new providers emerge, including 'for profit' providers, it will be critically important to ensure that a substantial number of community housing properties continue to be allocated to tenants with the greatest need and that there is no loss of community connectedness and specialist tenancy support that can be critically important to enabling people with higher needs to sustain their tenancies.

The three tiered system may provide opportunities for smaller and medium sized providers to grow in size in the future if this is appropriate for their business model. In pursuing growth strategies however there may be implications for the tenant profile. Homelessness Australia is aware that so-called 'one social housing system' models have resulted in some community housing providers being pressured to allocate properties to people who may not be best suited for, or fit with, the tenant profile.

² Bleasdale, M Supporting the Housing of People with Complex Needs, AHURI Research and Policy Bulletin,, November 2007; Gronda, Hellene Dr, What Makes Good Case Management Work? Bringing Together the Evidence, AHURI Research Synthesis, 2008.

While Homelessness Australia is not suggesting that those on the priority list be necessarily denied access to social housing properties as they become available, it is important that housing providers have some discretion over property allocations.

The increased involvement in communal decision making that community housing often facilitates for tenants means that the tenant mix is important and it is in the interests of both housing providers and tenants to ensure that the tenant profile maximises cohesion among residents.

The national community housing standards (sections 1, 3 and 4)

Homelessness Australia understands that the interests of tenants are further protected by the National Community Housing Standards which cover areas such as tenancy management, asset management, tenant rights and participation in decision making processes, working with community, governance and organisational management, management systems and human resources. While there are currently a set of national standards our advice is that the application of these still vary to some degree across each jurisdiction. We would be keen to see strong nationally consistent standards applied across all jurisdictions in the national regulatory system.

We would be particularly interested in ensuring that the following standards are protected or enhanced:

1) Tenancy Management

1.1: Tenants are selected openly and fairly, based on an assessment process which considers individual and local housing needs and meets the stated aims of the organisation.

Homelessness Australia believes this is an important standard to preserve as the sector grows and we again re-iterate that so-called 'one social housing system' models could have adverse implications for the tenant mix of some community housing providers if they are forced to allocate properties to people on the priority list who may not necessarily suit the tenant profile of a particular community housing provider.

1.2: The organisation is tenant-focused and works with tenants to establish and maintain successful tenancies

Ensuring that organisations remain tenant focused will arguably become increasingly important as the community housing sector expands.

Community housing providers have an established record of protecting the needs of tenants through internal strategies policies and procedures, including ensuring that tenants understand the rights and responsibilities that go with their tenancy and have security of tenure.

1.3: The changing housing needs of tenants are responded to fairly and flexibly within the capacity of the organisation.

For Homelessness Australia, it is important that this standard is protected or enhanced given that many of our client group will have changing support needs as they transition from homelessness to stable housing.

1.4: Tenancies are ended in a way that is legal and minimises the impact on the organisation and tenants.

Homelessness Australia is specifically interested in the preserving the following:

- Security of tenure means that community housing organisations should not evict without a just cause and organisations should take reasonable steps to ensure tenants are not evicted into homelessness.

We are also interested in:

- Strengthening 1.4.2, prevention of forced terminations and see tenancy support programs as having a role to play here.

We support ensuring that accessible, open and transparent processes for receiving and responding to feedback from tenants are enshrined in a national system:

- 1.4.5, seeking feedback from tenants when tenancies end should be retained.

1.5: Outsourcing tenancy management.

As organisations grow and dwelling numbers held by providers increase it will be important to monitor tenancy management arrangements closely.

For Homelessness Australia and the people we represent, security of tenure is particularly important and we would want to ensure that this is protected by a national regulatory system.

3) Tenant rights are upheld throughout the organisation's work and those who access the organisation are assisted to exercise their rights and responsibilities.

We are particularly interested in ensuring that as providers grow their commitment to remain tenant focused housing providers who place the rights, needs and interests of tenants at the core of their business is not diminished.

Standard 3.1.3 which articulates the need for providers to clarify the rights of tenants and the responsibilities of tenant and housing provider are particularly important for tenants who may have complex needs or have difficulty understanding complex documents such as tenancy agreements. The standard also provides for tenants to have avenues available to them in the event that disputes arise. This too is important.

Standard 3.1.4 that requires providers to monitor their work around tenants' rights and protecting the interests of tenants will arguably become increasingly important for tier 1 growth providers as their pool of housing stock grows and the number of housing managers

employed expands. A national regulatory system could have a role to play in ensuring that larger (and smaller) providers remain tenant focused.

Standard 3.2: Tenant participation. Tenants are encouraged to provide feedback and become involved in decision-making on issues which affect them or their tenancy.

As we have stated earlier the increased opportunities for tenant participation is for us, one of the greatest strengths of the community housing model and one that we want to see maintained as the sector grows and protected by a national regulatory system.

This would include ensuring that formal consultation between provider and tenants about changes continues, that tenant representative forums, councils and associations continue to be encouraged and supported to provide feedback about policy and service delivery issues and housing management.

Standard 3.2.5 which requires housing providers to break down barriers to participation will be important to preserve and enhance as housing providers grow in size and scope.

Standard 3.3: Tenant participation in housing co-operatives.

This will arguably become an increasingly important issue as will ensuring that an appropriate mix of skills and abilities to participate in the management of co-operatives is harnessed from within the tenant base.

Ensuring that tenants are supported and trained to manage housing cooperatives effectively and that boards of management are appropriately skilled in governance in a national regulatory system may ultimately determine the success or failure of the co-operative model of community housing in the longer term.

Homelessness Australia notes with some concern that the number of housing co-operatives has been in decline as this tenant participation model has been important in facilitating community inclusion for people who have entered housing co-operatives after periods of homelessness.

Standard 3.4: Access to services of the organisation. Applicants, tenants and service users are, as far as possible, given opportunities to access a range of services appropriate to their needs.

This is important for our client group and for people with disabilities. Homelessness Australia believes this should be protected or enhanced.

Standard 3.5: Confidentiality and Privacy.

Homelessness Australia believes all providers should comply with relevant confidentiality and privacy standards.

Standard 3.6: Complaints and appeals. Complaints and appeals of decisions are addressed promptly and fairly.

Arguably a national regulatory system should facilitate greater consistency around complaints and appeal processes and accessing dispute resolution bodies. Homelessness Australia supports this aim.

4) Working with the community.

Community housing providers have a proven track record of working well with community services and enabling tenants to access the support services they need to promote health and well-being and sustain their tenancies. Homelessness Australia sees this as a key strength of the community housing sector and one that must be preserved as the sector expands and providers grow in size and scope. In short, it is why we believe the model is a good one for people who have experienced homelessness who have support needs that are usually not met to the same extent in public housing or private rental.

Standard 4.1: Tenants' access to support. Tenants have access to relevant support to help manage and maintain their tenancy.

Ensuring that tenants are encouraged and supported to access health and social support services is a key concern for Homelessness Australia.

Many community housing organisations have a long and proven track record in terms of having increased flexibility for tenants and providing a housing environment that facilitates ease of access to support services that enhance the health and well-being of tenants and build their capacity to sustain tenancies on a long term basis.

This is incredibly important for people experiencing homelessness, particularly those with higher support needs who may exhibit challenging behaviours that are not tolerated in public housing or the private rental market.

We want to ensure that this continues to be a feature of the community housing model as the number of dwellings held by providers of community housing increases and the sector grows in size and scope.

Standard 4.2: Building community capacity. Work undertaken by the organisation contributes to sustainable improvements in the wellbeing of tenants and communities.

This is incredibly important for the people that Homelessness Australia represents and that our member services support on a daily basis.

Community housing offers opportunities for people to enhance their civic, community and economic participation and in doing so could be seen as fundamental to the current Government's social inclusion agenda.

At a practical level this is achieved by promoting cooperation and networking among tenants, establishing constructive relationships with community services, linking tenants to employment services and community centres, facilitating informal and formal arrangements for tenants to network and socialise and improving the physical environments in and around where community housing is located.

Homelessness Australia believes that this aspect of the community housing model must be protected and enhanced as the sector expands in size and scope.

A final note

Homelessness Australia believes it is important to acknowledge that the continuum of housing begins with homelessness and support, not social housing. We also note that social housing may for many people not be a 'stepping stone' into other housing tenures as has been asserted but a long term housing option and one that should not invite unnecessary stigma upon tenants who need or choose to live in social housing dwellings on a long-term basis.

Homelessness Australia's primary concern is that all forms of social housing remain accessible to people who are experiencing homelessness and those who are at risk of becoming homeless. We know that in the context of a housing affordability crisis and in particular the failure of the private rental market to remain a realistic option for people on very low incomes or who are wholly reliant on income support, that social housing is increasingly the only realistic option that can deliver some security of tenure as well as affordability and safety for the clients our member services support. We support the growth of the not for profit housing sector but we also believe that Governments must continue to accept responsibility for the provision of public housing for those who for a variety of reasons, cannot gain access to, or whose needs cannot be met by other forms of housing.