

# Southern Homelessness Services Network

*Submission on the*

**Social Housing  
Regulation Review**

*Interim Report*

2022



# SHSN

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# 1. About the Southern Homelessness Services Network

The **Vision** of the Southern Homelessness Services Network (SHSN) is an end to homelessness in Southern Region of Melbourne (comprising Bayside-Peninsula and Southern Melbourne areas and covering the local government areas of Bayside, Cardinia, Casey, Frankston, Glen Eira, Greater Dandenong, Kingston, Mornington Peninsula, Port Phillip and Stonnington).

The **Mission** of the “Victorian Homelessness Networks is to facilitate, inform and support regional homelessness services and stakeholders to work together to co-ordinate services to people who are experiencing or who are at risk of homelessness.”

The Southern Homelessness Services Network (SHSN) comprises all funded Specialist Homelessness Services in the Southern Region including services providing crisis, transitional, long term, family violence and youth support and accommodation. Our members include Launch Housing, the Salvation Army and Sacred Heart Mission. The SHSN also supports allied service sectors working in homelessness. The SHSN is a resource for the homelessness sector in the South.

The key strategic SHSN objectives are:

1. To promote and support innovation, knowledge sharing and expertise in the best interests of consumers
2. To foster relationships and collaboration between service providers to ensure timely, coordinated and effective responses
3. To act as a conduit between the Department of Health and Human Services and the regional service sector homelessness related data, issues and trends to inform policy
4. Working together to end homelessness

## 1.1 About the SHSN submission

The SHSN commends the work of the Social Housing Regulation Review as evidenced by the Panel’s Interim Report. The Interim Report is a comprehensive review, providing opportunity to shape the Social Housing sector to respond to emerging and future needs including empowering and supporting tenants and prospective tenants. The SHSN supports the focus of the Review in placing tenants at the centre of the social housing system and ensuring the system works for them and supports the Panel’s focus on authentic tenant empowerment.

Any submission about social housing in Victoria must acknowledge the need for vastly more social housing to meet the real demand from people experiencing homelessness, financial disadvantage and marginalisation from the private housing markets (both rental and home ownership). Many people in need of social housing do not currently apply due to the long waiting times so the current Victorian Housing Register (VHR) waiting list is not a full reflection of the demand for social housing.

The SHSN values this opportunity to have input into the regulations governing social and affordable housing in Victoria. The SHSN has prepared a submission focusing on the sections of the Interim Report where our members have the most experience and can offer the most valuable advice to the Panel in preparing the final report – Papers 4 and 18 focussing most on support for current and prospective social housing tenants.

In preparing this submission, the SHSN worked collaboratively with our corresponding network in Northern Metropolitan Melbourne (Northern Homelessness Network) to jointly survey our members who manage community housing, Tenancy Plus and other programs supporting community housing tenants. The results of the survey strongly inform this submission and survey quotes and case studies are included throughout the submission.

## 2. Responding to Paper 4. Tenancy Sustainment

### 2.1 Standards for sustaining tenancies

The SHSN supports standards for sustaining tenancies for both community and public housing providers. The discussion in this submission includes a range of issues that should be addressed in these standards with a particular focus on support for sustaining tenancies and adequate funding for housing providers to provide such support.

Performance standards for housing providers should be fully aligned with the agreed purpose of social housing and the Victorian Government's social housing policy objectives. Performance standards could include a simple and transparent method for assessing the allocation policies and renter profile of registered agencies as well as their performance in sustaining tenancies and improving tenant wellbeing. Public housing and community housing should be required to meet a common set of performance standards based on a common allocations policy and funded supports for both community and public housing tenants.

Standards could have measures/targets which housing providers (including Homes Victoria) should publicly report on annually, for example:

- % of tenancies sustained per annum
- % of tenancy breakdowns / evictions per annum
- Number of tenancies sustained over a time period (eg 5 years)
- Tenant engagement in decision-making
- Tenant wellbeing indicators over time
- Housing provider tenant profiles (at agency level not individual level) focussing on proportions of tenants from different VHR priority groups.
- Wait times for Tenancy Plus assistance or other necessary support programs

Our members support the following processes to inform the development of stronger standards on sustaining tenancies:

- Consultation with homelessness sector and allied services
- Consultation with those who have successfully sustained tenancies and those who have not sustained tenancies
- Consultation with community housing and public housing sector
- Review existing literature and research to see what works
- Undertake further research to inform development of standards if required

### 2.2 Support to sustain tenancies

*The key elements of successfully sustaining a tenancy from the point of view of the support provider start with ensuring that the tenancy is a 3-way partnership between the person being housed, the housing provider, and the support provider. It is essential that the relationship is developed and nurtured to ensure that if issues with the tenancy arise, they are caught early. The support provider should be doing home visits from the start of the tenancy. Regular contact between the housing and support provider is essential so that if issues arise they can be dealt with early. The support provider works directly with the person to build their capacity to manage the tenancy independently and build rapport with the housing provider so that when support ends, the tenancy is sustained (SHSN member survey).*

*Requires support workers and tenancy managers (via frequent face to face contact) to develop a common set of values, objectives and processes in relation to the shared task of sustaining tenancies (SHSN member survey).*

The key elements to successfully sustaining tenancies according to SHSN members are presented in the following sections.

### **Support and Tenancy Management**

- Individual support plans tailored specifically for each tenant and their support needs (not a one-size fits all approach) are required. Support should be available to all social housing renters through every stage of their tenancy as needed.
- The provision of a holistic and flexible model of support focussed on sustaining tenancies, and closely integrated with housing management, is an essential element of the Housing First model. Without this type of support the placing of highly vulnerable people into long term social housing can result in tenancy failure and recurring episodes of homelessness. Ideally, a tenant should be able to progress through a continuum of support with the right interventions provided at the right time
- Capacity for tenants to access support when and as needed rather than waiting until crisis point. Use prevention and early intervention strategies by developing risk indicators assessment for every tenancy and linking to supports when needed.
- Appropriately funded support programs
- Supports need to be flexible in terms of the level and duration. Availability of longer term supports if required. 3-6 month standard outreach program is not enough time for tenancy settlement support
- An assessment of support needs focussed on sustaining tenancies should be part of every social housing allocation process followed by linking to required supports
- Clear, regular and timely communication with tenants (engagement) - non-engagement by the renter is a common precursor to a tenancy not being sustained
- Continuity of housing and support staff for tenants (tenants can disengage if housing and support staff change)
- Support to sustain tenancies needs to be fully integrated with social housing management. Care coordination between housing provider/tenancy workers and support workers and tenant is required. Clear lines of delegation and responsibility between tenancy management and support providers provide a solid foundation for joint work
- Better management of tenant expectations is required. Tenants should be fully informed of what the housing is, i.e. Is it housing with support or is it just housing
- Access to rental arrears support
- Consideration of impact on other tenants when in a larger housing complex to sustain tenancies of the majority of tenants when one tenant's behaviour is jeopardising a number of other tenancies
- Consider the use of peer supports in tenancy settlement to supplement (not replace) professional support programs.

### **Quality of social housing property**

- Properties and shared facilities need to be well maintained
- Social housing should be of a quality that the tenants want to stay
- Tenancies can fail due to the poor quality of some long term housing especially compared to transitional housing.

### **Role of the tenancy manager in providing support**

- The role of the tenancy manager should be to be proactive when a renter begins to go into arrears, complaints from neighbours begin, property damage etc. If it is long term housing with no support then they should be referring directly to Tenancy Plus as soon as possible and in the meantime working out payments plans, exploring access to other funding assistance programs, etc
- Tenancy Managers do not have the capacity to provide comprehensive support. It also blurs the lines between support and landlord functions. The perfect scenario would be to have a support service working in partnership with the community housing organisation. The Tenancy Officer does have capacity to provide basic support such as telephone check-ins, provision of information and to make a warm referral to an agency when needed
- Tenancy managers currently refer to Tenancy Plus to work with renters, however there are long wait times for this program, during which time the tenancy continues to decline
- Staff identified that tenancy management should be separate to case management/support roles but that tenancy managers' knowledge of tenants, their situations and having good links and relationships to local services is really critical in getting the help people need
- Having on-site staff is key to sustaining tenancies. A safe place that tenants can discuss their concerns and seek advice works well in sustaining tenancies.

### **Communication**

- Providing clear (and sometimes repeated) expectations of a tenant and their families of being a good tenant - what the tenant can expect from their housing, their rights and responsibilities and those of the landlord. Ensuring communication is clear, regular and timely. If support services are linked to the tenant, making sure regular lines of communication are set up, and that each party knows what is expected of them
- The Tenancy Manager should provide all information at the start of the tenancy and check in regularly with tenant and the support provider. It is important that if there are any issues arising, they let the support provider know right away. More regular and frequent tenancy manager contact and engagement at the early stages of a tenancy are often required.
- Build relationships so tenants are confident to raise issues, clarify expectations and roles, provide information on relevant services. Communicating with tenants, listening to their concerns and understanding what has caused the tenancy to be at risk and making the necessary referrals is a role for tenancy managers
- Tenants should be informed that most social housing does not come with supports. Such misunderstanding can lead to aggression toward the housing providers due to frustrations and unrealistic expectations and can result in putting a tenancy at risk.

### **Feedback from our members (community housing providers) on providing support to tenants**

*We support people with their social housing experience by providing professional, responsive, respectful, and ethical services to renters and their families, while ensuring that all properties are safe, meet appropriate standards and are well maintained (SHSN member survey).*

*We do not have support in-house. We rely on partnerships with services. We are occasionally successful in seeking philanthropic funds which enables us to run specific programs. Important working relationships exist with support agencies to provide referral and professional help (SHSN member survey).*

*We employ housing workers who are dual skilled: (1) in social work, social services or community development; (2) and tenancy and property management. With professionally trained workers, they are well placed to work sensitively with people who have been badly affected by trauma, to help sustain their tenancy. We maintain small tenant to staff ratio, at approximately 1:60 (housing worker:tenants). These are by far better than in public housing, for example, where they are around 1:300. The combined effect of trained staff and low staff to tenant ratios allows for excellent communication and effective response to problems (SHSN member survey).*

### **Case Study 1: Josie**

*Josie was a social housing tenant with chronic health and behavioural issues. She was also drinking and causing many disturbances in her property. This behaviour was impacting others that lived near her. Josie had received multiple breaches and was facing eviction. The housing provider had a partnership with a health service who sent in an outreach nurse to this property one day per fortnight. The tenancy officer referred Josie to the nurse who was able to slowly build up a relationship with her. This included dental work, free glasses etc. Josie's immediate health needs were dealt with. She was also referred to AOD services. Over time there was a development of trust between the Josie and the nurse. This enabled the nurse to talk to the Josie about her behaviours which were leading to her potential eviction. With the assistance of the nurse, these behaviours reduced and an eviction was no longer warranted. Sadly, this program was offered pre-Covid and has been withdrawn at present.*

## **2.3 No evictions into homelessness**

There was mixed support from our members on the question adopting a “no evictions into homelessness” policy underpinning social housing. There was general in-principle support but members are concerned about the practicalities of implementing such as policy. Support for this proposal would be conditional on the right tenant supports, legislation to protect housing providers, alternative housing options being in place for tenants at risk of eviction and funding mechanisms to manage the rent shortfalls. There is the issue of tenants who decline to engage with support. In addition the impact of “anti-social behaviour” on neighbouring social housing tenants being a key issue. For example, the impact on a larger number of neighbours who may choose to leave their tenancies due to one “anti-social” tenant, would increase the number of tenants becoming homeless rather than the one “anti-social” tenant becoming homeless. The following quotes from our member survey demonstrate some of these complexities.

*Everyone is entitled to safe and secure housing. Low income tenants should not be disadvantaged due to lack of available support services and sufficient investment in housing supply to enable flexible relocation practices. Because people who may be evicted often have no other housing options and re-present to homelessness services for priority housing. The cost to individuals experiencing recurring homelessness is increased chronic health issues that result in a cost impost on the health sector (SHSN member survey).*

*My own values support this approach, but I am well aware that it is not always feasible. Properties are very difficult to source and there may be nowhere else to place the client. There is also the issue of tenants being very unwell and not willing to move into another property. We have also seen tenants who refuse to pay rent. There are times that eviction into homelessness is the only option (SHSN member survey).*

*Housing providers need to have the discretion to evict renters in exceptional circumstances. For example when there has been extensive neighbourhood fatigue, danger, anti-social behaviour etc. Eviction is a last resort but a necessary action. Ideally there would be support available when an eviction is imminent to explore alternative housing options (SHSN member survey).*

*If tenant behaviour is such that it impacts others, I believe we must evict. For example a young woman moved into a property. After her child was removed, she then targeted other women in the property, stalking them and causing damage to their vehicles. She damaged her property with approximately \$60,000 damage. She refused to be linked with Tenancy Plus or other supports. She refused to meet the Tenancy Officer to discuss issues. Four good renters vacated their property due to her excessive behaviour and others pleaded daily with the tenancy worker to move them (SHSN member survey).*

*This is a gold standard however it needs to take into account the impact of behaviour on other renters and/or neighbours. We have seen good renters vacate when a situation has taken long periods to be addressed. We also face the real prospect of re-traumatising renters when living next to prolonged anti-social behaviour etc. I really believe this is worth aspiring to, however support, Tenancy Plus and allied services must be funded to intervene in a timely manner to support renters as needed (SHSN member survey).*

*If the true cost of providing housing to high needs groups is recognised ie a loading component to recognise the higher cost involved in sustaining rental arrears and property damage (SHSN member survey).*

*Central to our approach to tenancy management is compassion and flexibility; with all efforts made to sustain a tenancy with reasonable and fair targets for rent arrears. We work from the premise that evicting a tenant must be a last resort because this will likely result in another experience of homelessness for the individual. Therefore, staff work diligently with tenants through their tenancies to ensure that they can remain in housing. The two key largest issues we face in tenancies is rent arrears and anti-social behaviour (SHSN member survey – community housing provider).*

### **Case Study 2: Alan**

*Alan is a 42-year-old man who had been sleeping rough for approximately six years when he was referred to our support program. He had a few stays in shared rooming house facilities in this time, however, he identified having difficulty with communal living. Alan had altercations in crisis accommodations and rooming houses which resulted in bans from most crisis housing options. These behaviours coupled with alcohol misuse led to continued interaction with the legal system. Whilst Alan was rough sleeping, he maintained employment in the construction industry, often sleeping on job sites. With some advocacy by the Case Manager, Alan was offered one bedroom social housing unit within 60 days of commencing with our program. After housing, we were able to link him to a new GP, substance abuse services and mental health services. Alan has stated that securing permanent housing quickly allowed him to rebuild his life. Our program continued to work with Alan on his budgeting skills, cooking skills, and eventually he requested mental health support. Alan built a relationship with his community housing provider and has now been housed for approximately five years.*

### **Transfer with conditions**

A number of conditions were recommended by SHSN members for transferring social tenants instead of evicting them. These include:

- Tenants committing to a support plan that clearly sets out expectations, rights and responsibilities of tenant, housing provider and support provider with timeframes and review points
- Checking that the proposed property is a good match for the person and not going to exacerbate their issues
- Significant rental arrears need to be addressed and an agreement in place to ensure that they do not fall behind again. This could include referral for financial counselling or assistance with budgeting

*The key to a transfer would be appropriately resourced support to assist renters in their move, link them into their local community and services and to work with them to ensure that whatever was the cause of the previous tenancy breakdown won't happen again (SHSN member survey).*

### **Transferring to alternative accommodation**

SHSN members believe that the alternative accommodation should (as much as possible) meet the needs and requirements of that tenant. Ideally this would be a minimum of a one bedroom apartment for singles (or a bedsit, if that's all that is available) as rooming houses with shared accommodation can exacerbate issues affecting tenancy sustainment, particularly for people with more complex needs. Alternative accommodation should be long term housing options, not temporary. Keeping them in an area close to any existing supports is also important or assisting them to establish new supports if moving out of area. Some tenants may need supported housing such as Common Ground or Rooming House Plus with on-site support staff or an SRS.

### **Key elements of a whole-of-system approach to avoiding evictions**

There are a number of key elements for an effective whole-of-system approach to avoiding evictions. A collective impact approach based on strong service coordination between housing providers and support providers is crucial as well as a commitment from all players to a consistent approach. The approach would have limited efficacy if, for example, one housing provider continued to evict tenants when all other housing providers were trying to implement a "no evictions policy". A collective impact approach might have housing providers agreeing to transfer tenants between each other as well as internal transfers.

The elements of a whole-of-sector approach to avoiding evictions proposed in the SHSN member survey include:

- Sector-wide commitment to relocating tenants across providers and geographical areas
- An agreed "no evictions into homelessness" charter and practice framework
- A legislated framework, which would support a consistent approach
- Appropriate training and development for tenancy management staff
- Stronger partnerships between tenancy managers and support agencies and their staff
- Funded, available and accessible long term supports for tenants at risk of eviction, including clear support plans of all supports roles, responsibilities and tasks
- Available, affordable and suitable properties, especially for transfers
- Financial support for agencies to assist in mitigating rental arrears, property damage etc

*To adopt a whole of systems approach, all stakeholders (State and local governments, support providers, housing providers, etc.) would need a common understanding of the issue and how each of their systems needs to contribute. Each stakeholder would be part of developing the policy and plan to implement. There would need to be oversight and regular meetings to track progress and solve any challenges that emerge (SHSN member survey).*

## 2.4 Current practice in sustaining tenancies

Training, manuals, escalation processes and checklists for tenancy workers are resources to support housing providers to sustain tenancies. Tenancy manager networks and sharing of resources would also be helpful. The SHSN would like to see resources addressing the following best practice elements to sustaining tenancies:

- Current alternatives to eviction
- Ways to detect and manage actions and behaviours
- What support should be offered by housing providers
- The role of tenancy managers in sustaining tenancies
- Clear outline/agreement of roles and responsibilities between housing provider and support provider

SHSN members currently use a range of strategies to manage behaviours that put tenancies at risk. These include:

- A register of 'focus tenancies' with staff meeting regularly to develop strategies to manage and mitigate risk
- Hosting regular forums with support agency partners to discuss shared tenancy issues (e.g. tenant non-engagement)
- Share tenancy at risk information with the tenant's support agency (with informed tenant consent)
- Support agencies work with housing providers to understand the tenant and any concerns and establish plans and regular tenancy check-ins
- Explore creative ways to mitigate risks i.e. adapting a property to compensate for behaviours such as padding walls for noise, key alternatives such as pin codes etc
- Greater staff presence at communal properties
- Rent arrears plans
- Use of CCTV and employment of security guards at properties (costly and not a long term solution however it has been required in cases of extreme danger) and calling in Police when required.

Current alternatives to eviction include:

- Rent arrears repayment plans
- Provide assistance to source alternative accommodation
- Transfer tenants between available housing
- Support tenants to establish a plan and a workable agreement to attempt to work around evictions
- Engagement with support teams - collaboration to ensure there is a united approach
- Seek funding to assist with arrears payments, purchase of extra resources if needed
- Tenancy Plus referrals
- Attend body corporate and neighbour meetings when appropriate to mitigate risks, identify concerns and educate the community.

*We have established a comprehensive system for managing rent arrears on a weekly basis, working with tenants so they do not accrue large arrears. Yet this is not always possible. In this case, we might pursue arrears through legal channels, with the goal of establishing a payment plan (SHSN member survey).*

*Anti-social behaviour is a significantly more complex tenancy management issue and therefore we takes a flexible approach to this. Most often, we are aware about complex behaviours amongst the tenant group, and seek early interventions to prevent escalation, working with tenants and support workers to maintain the tenancy. In the event that a tenant endangers those around them or staff, we promptly act to ensure the safety of tenants and staff (SHSN member survey).*

*We are a support provider so we use a relationship based approach with the housing provider. We meet regularly to review all tenancies and expect that the Supportive Housing Workers are in regular contact with the Housing Provider. The support provider also makes regular home visits (at least fortnightly) to ensure that the property is in good condition and assess the client in their own environment. We ask that housing providers let us know immediately if they even think something may potentially be off. That way we can step in and quickly provide support. We will also meet with the housing provider and client to develop a Tenancy Support Plan where each person has a responsibility assigned to support the person to get back on track. If everything we do to support the person (linkage to AOD, MH, paying arrears) does not work, we support the housing provider to breach the client (SHSN member survey).*

## 3. Responding to Paper 18. Prospective Social Housing Tenants

### 3.1 Support for applicants on the VHR

SHSN members suggested a number ways to support VHR applicants, including:

- Increased access to support services while they are on the waiting list
- Regularly reviewing applicants' preference areas to ensure that their applications are up to date and appropriately categorised
- Access to funds/brokerage to improve their temporary/current accommodation
- Upfront information regarding waiting times for accommodation and for transfers
- Support for VHR applicants to ensure that their situations and needs do not worsen whilst waiting for social housing (eg worsening health conditions)
- Rental subsidies to private landlords so that the person has somewhere to live--examples of this in the United States are Section 8 rental vouchers, Supportive Housing Certificates, Shelter Plus Care certificates.

A "Tenancy Plus-type program" for VHR applicants could include the following:

- Planning and preparation tasks for achieving a sustainable tenancy – including rental readiness skills, budgeting, independent living skills (eg cleaning, cooking) etc
- Available to all VHR applicants and also assist people in applying for the VHR
- Identifying issues holding up an application, and ensure that applications provide the required information for a potential offer, so they are not overlooked
- Having a support provider for the VHR applicant who can advocate on their behalf with the private landlord to ensure they have access to adequate housing whilst waiting for social housing

*While Tenancy Plus type program would be supporting VHR applicants with obtaining and sustaining appropriate interim accommodation they could also be assessing and updating the applications if client circumstances change and their application requires amendments. The interim accommodation might also become long term sustainable housing. The program could also support clients while they're in their interim housing to improve their rental readiness for when their long term option becomes available, providing them with a more positive start to their tenancy (SHSN Member Survey).*

SHSN members agree that Specialist Homelessness Services (SHS) are well positioned to provide such support due to their unique skillset in identifying risk factors and connecting clients with available support resources. SHS staff understand the VHR application process and are skilled at case management and they understand the issues potentially holding up VHR applications. This would look different from the case management currently provided to the majority of SHS clients as it would likely be over a longer period of time with varying intensity. This would require additional resourcing as the SHS is not currently funded to provide the long term support required whilst people are waiting for social housing.

### 3.2 Private Rental

SHSN members proposed a number of issues facing private renters and proposals for supporting vulnerable and disadvantaged renters in the private market. These include:

- More affordable private rental housing
- Longer tenancy agreements
- Managing rent increases – a tenant may be able to barely afford rent when they first move in but rents increase more than income and income support so rent increases put tenancies at risk
- Real estate agents being less judgemental and discriminatory – educate the real estate industry about experience of homelessness and how to work with at risk tenants
- Having a support provider for private renters to liaise with the landlord where appropriate and advocate for/with tenants so their needs are met by the landlord
- Incentives for private landlords to accommodate complex and vulnerable renters
- Programs such as head-leasing to increase access to the private rental market for people with no or poor rental histories.

*Work with the Real Estate Institute to inform and educate them about homelessness, provide them with key service information and contacts of where they can refer renters when a tenancy is a risk. The REIV can disseminate this information to their real estate community and provide some training programs to upskill Real Estate Agents. Work needs to be done with the private owners, Body Corporates etc to encourage them to lease to low income renters. Programs such as PRAP and PRAP Plus [and HomeGround Real Estate] provide an excellent service to private owners (SHSN member survey).*

*If renters in the private rental market could be given the same protections and benefits as social housing renters, including levels of affordability, there would be no need for a social housing system. The implementation of these protections and benefits would effectively transform these parts of the private rental market into a form of social housing. ... The “housing market” will always require a level of profit – which suggests that the creation of a not-for-profit social housing system will often be more cost effective. Our preferred policy outcome is that the Victorian Government creates a social housing sector that is big enough to address the needs of all those who are currently excluded or exploited by the “housing market” while, at the same time, regulating minimum standards for all rental providers (SHSN member survey).*

### 3.3 Rooming Houses

The SHSN would like to see rooming house tenants remain on the VHR if they wish to. Rooming houses are not sustainable, appropriate (or affordable in the case of private rooming houses) long term housing for most people. The sharing of facilities (kitchens and bathrooms) often compromises the safety and security of rooming house tenants. Rooming houses (boarding houses) are considered as a category of homelessness by the Australian Bureau of Statistics with socio-economically disadvantaged people living in rooming houses with shared facilities counted as homeless in the Australian Census.

Minimum standards for rooming houses should be improved including to provide a higher ratio of bathroom/toilet facilities. The key to providing a safe environment is a supportive landlord including regular and responsive maintenance and additional bathrooms over and above the standards so there is less space for conflict.

Implementing the current standards such as lockable doors would also assist as well as higher quality accommodation that tenants want to live in and look after. Other methods of increasing safety and security in rooming houses include safety technologies such as duress systems, monitoring and response systems (CCTV), security guards, police liaison, on-site tenancy management and visiting or on-site support services, stringent complaints mechanism and a willingness to follow up.

Unfortunately, higher quality private rooming houses tend to be out of scope for SHS clients as they are too expensive and/or they refuse to take SHS clients. In addition, some SHS agencies are banning use of poor quality private rooming houses as too risky for clients. This has led to a shrinkage of rooming house options particularly in the inner South.

Quality rooming houses have the following:

- Clean, safe, quiet and secure
- Have appropriate support services available for those who need it
- Maintenance issues addressed promptly
- Onsite staff presence – regular visits onsite or staff based onsite
- Space - the more space per tenant, the better
- Private bathrooms
- Safety protocols in place
- Ability for provider to act on unsafe/aggressive behaviours
- Redevelop into self-contained accommodation to avoid sharing facilities.

*Good quality fitting and gardens - if a high standard property is provided, renters will respect. One woman showed me a picture she had taken of her rooming house and she was so proud because it was a nice building in a nice street (SHSN member survey).*

## 4. Conclusion

The SHSN hopes that the views of our members inform the development of the recommendations of the final report for the Social Housing Regulation Review, particularly around provision of support to social housing tenants and prospective tenants.

This quote from one of our members provides a useful overview of the issues raised by the SHSN -

*The aspiration to reduce negative housing exits will only be achieved through increased supply of social housing (to at least reach a critical mass) and ongoing funded support that can be adapted and tailored by providers to suit their client outcomes (SHSN member survey).*

In addition to the much-needed changes to regulation and tenant empowerment proposals in the Interim Report, the SHSN would like to see well-funded and well-targeted supports available for as long as tenants need them. Over the last 25 years, as social housing has moved to provide housing for those “most in need” through prioritisation, the supports required for more complex needs tenants have been generally overlooked. The Review can articulate a continuum of support model for social housing tenants from basic to intense that tenants can utilise at different points of their tenure, as and when needed. These supports are not currently available at the scale required to meet the current number of social housing tenants and prospective tenants and does not account for potential growth in this large target group.

The commended move towards a greater adoption of the Housing First approach in Victoria requires long term housing first, and then the appropriate supports to be available when a tenant needs them. The Housing First approach has an evidence base to demonstrate its effectiveness, particularly for people with complex needs, but social housing is not set up in a way that fosters a Housing First approach. For example, to gain access to the VHR, people experiencing homelessness need support first, to apply for VHR priority “Housing with Support”. This is also critical in placing the tenant at the centre of the social housing system rather than always trying to fit tenants into what the system offers. These concepts are important considerations when reshaping social housing for the 21<sup>st</sup> century.

The SHSN looks forward to the Panel’s final report and seeing the Panel’s recommendations for addressing the challenges raised in this submission.