



**Western Homelessness Network submission to the
Social Housing Regulation Review
September 2021**

The Western Homelessness Network (WHN) is a Network of twenty Specialist Homelessness and Family Violence Services (SHSs) managing 90 programs, operating in Melbourne's West (covering the Cities of: Melbourne, Moonee Valley, Maribyrnong, Wyndham, Brimbank, Melton and Hobsons Bay). These services meet every six weeks to improve responses to people experiencing homelessness in Melbourne's West through management of coordinated homelessness service system arrangements, consumer consultation, linkages with allied service sectors and shared professional development.

This submission has been prepared by Specialist Homelessness Services in Melbourne's west. The focus, therefore, is on the needs and experiences of those are or who have been homeless and who have sought the support of homelessness services. We are therefore only reflecting on the experiences of a sub section of those who access social housing.

The Western Homelessness Network would like to thank the Social Housing Regulation Review Panel for guiding this very important work and to for the opportunity to participate in the Social Housing Regulation Review consultation.

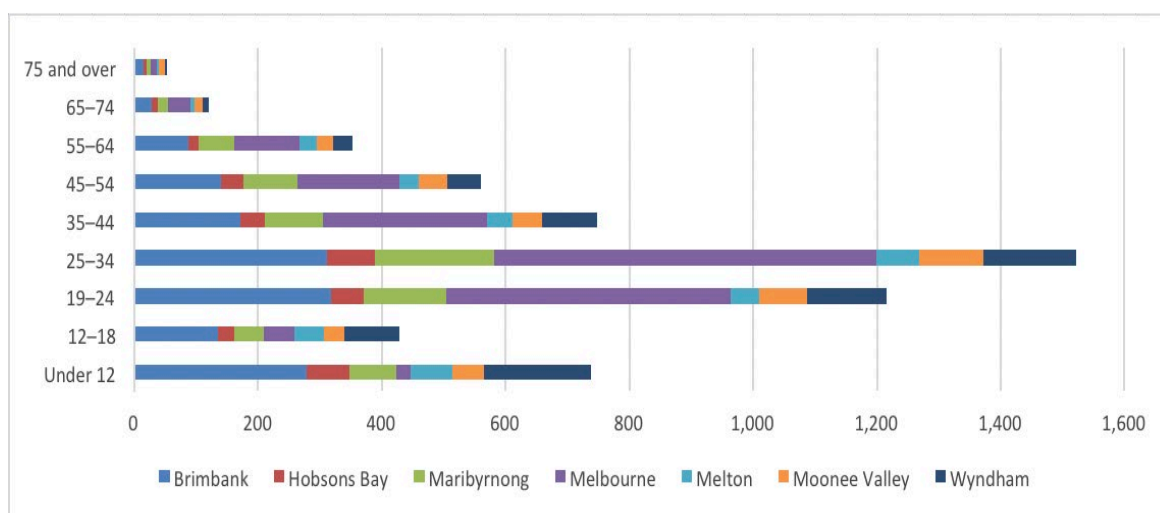
Unfortunately, given the demands of the COVID-19 pandemic and the Census 2021 Homelessness Enumeration on the homelessness sector, the Western Homelessness Network has not had capacity to prepare a formal submission of the depth and calibre that this important Review deserves. The attached submission is drawn from the notes of a meeting between the Western Homelessness Network and representatives of the Review.

Context

Homelessness and the Homelessness Sector in Melbourne’s West

The rate of people experiencing homelessness has been increasing in Victoria in recent years; this holds particularly true for Melbourne’s West, recording a 40% increase in the number of people experiencing homelessness on Census night 2016. This is a significantly higher increase than the rest of the state, which saw a rise of 14 per cent¹. In other words, 23 per cent of all the people experiencing homelessness in Victoria on Census night 2016, identified as being in Melbourne’s west.

Figure 1: Number of people experiencing homelessness in Melbourne’s west on Census night 2016, by age and



Local Government Area.

The nature of homelessness in Melbourne’s West has been changing significantly in recent years. The housing affordability issues that have affected the west have led to a surge in overcrowding², with an increase of 80% between the 2011 and 2016 censuses³. The most visible face of homelessness, rough sleeping, increased by 120% in the same period⁴ and there was a 50% increase in people living temporarily with other households⁵.

Housing context in the West

This increase in the numbers of people experiencing homelessness in the West is a direct result of the housing crisis – both in terms of supply and affordability. The West has historically been one of the most affordable areas of Melbourne. This is no longer the case. Private rental vacancy rates are low in Melbourne (2.1%⁶) and rents are high. In March 2021 there were no private rental properties available in the West that were affordable for someone on Newstart or Youth Allowance⁷.

There are 14,358 social housing properties in Melbourne’s west however, given that movement in to public housing is minimal, there are 12,651 on the waiting list for access to those properties in Melbourne’s west⁸. This represents about one third of those waiting for public housing in the State.

¹ Western Homelessness Network 2019, ‘Ending Homelessness in the West’ Western Homelessness Network, <http://www.nwhn.net.au/admin/file/content/2/c7/Ending%20Homelessness%20in%20Melbourne's%20West%20Aug%202019_1571202882052.pdf>.

² Defined by the ABS as dwellings that are four or more bedrooms short, allowing for gender and age.

³ WHN 2019a, ‘Ending Homelessness in the West’, p. 3.

⁴ Even taking into account the fact that the count of those sleeping rough in the West was a significant undercount, impacted by insufficient capacity to undertake the count.

⁵ WHN 2019a, ‘Ending Homelessness in the West’, p. 3.

⁶ Rental report, December quarter 2018, Department of Health and Human Services (2018)

⁷ Anglicare Rental Report, March 2021

⁸ Homelessness Australia advises in the Everybody’s Home campaign, that Australia will need 500,00 new social and affordable homes by 2026.

Given the significant lack of affordable housing in the West, social housing has a critical role in ending homelessness in Melbourne’s west.

Social housing provides not only an affordable housing option for the many Victorians on low incomes but provides a level of stability that is not offered by the private rental market. Stable housing is a necessary precursor for health and wellbeing and for capacity to effectively participate in employment, training and other forms of community activity.

Consumers of specialist homelessness services, surveyed by the Western Homelessness Network, identified that public housing is the factor that is most likely to resolve their experience of homelessness⁹:

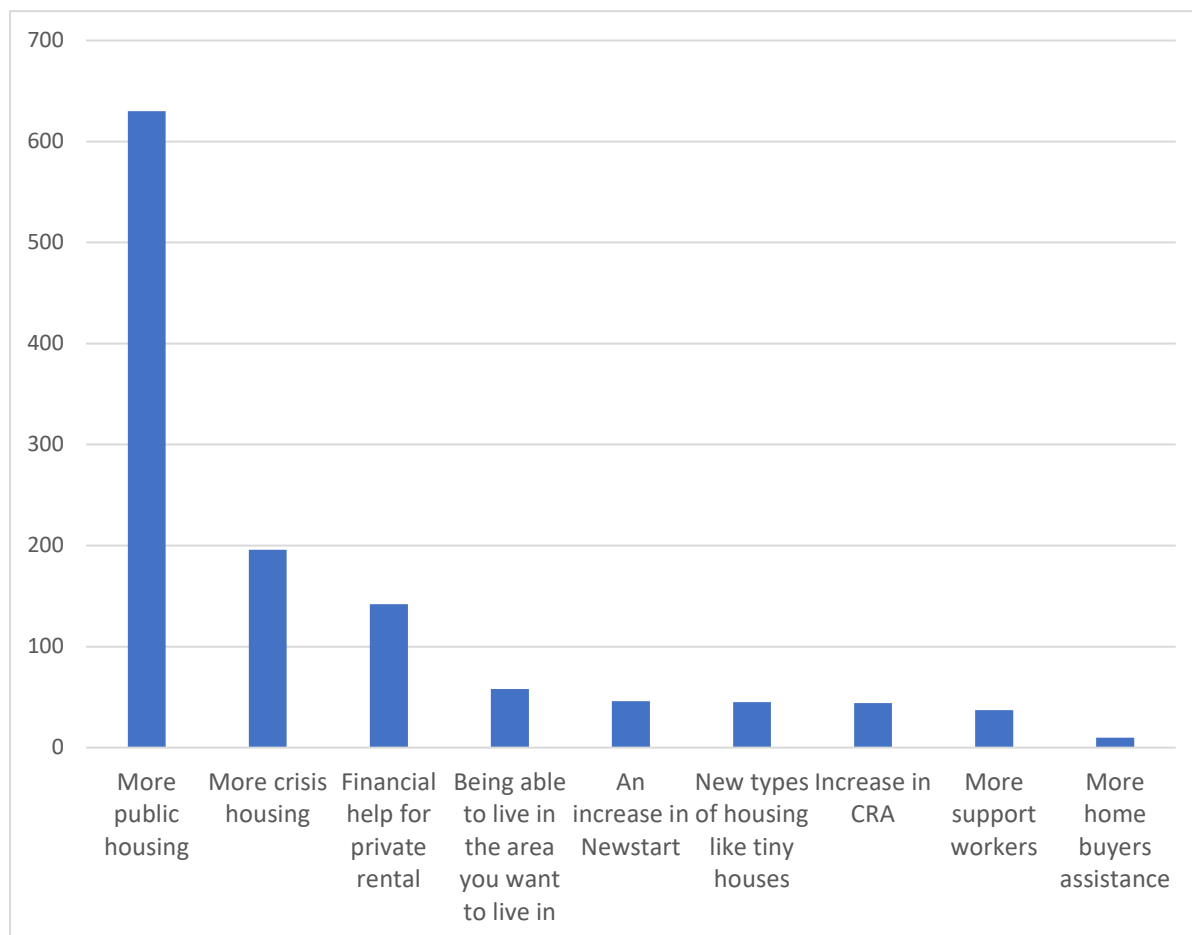


Figure 2: Rank of top three priorities for things that would help end homelessness: identified by SHS consumers 2019

Role of the Specialist Homelessness Service System

The Homelessness Service System in Melbourne’s west is overwhelmed. In an average year, 4,000 people are turned away from the two homelessness access point services without even an introductory appointment.

At present, only 11% of those people presenting to the homelessness access point services will be able to access case managed support as support resources are so stretched. For instance, approximately 400 people are waiting for case managed support in Brimbank and Melton. Consumers wait for an average wait time of 5 months; Sunshine can be up to 12 months...even longer for long term case management and for mainly for singles.

When the Supported Accommodation Assistance Program was created as the national program to respond to homelessness and family violence in Australia, the program was designed to be ‘program of last resort’, picking

⁹ Western Homelessness Network & The Consumer Participation Working Group 2019 ‘Northern & Western Homelessness Networks’ Consumer Participation Group: Submission to the Parliamentary Inquiry into Homelessness’, NWHN, < https://www.parliament.vic.gov.au/images/stories/committees/SCLSI/Inquiry_into_Homelessness_in_Victoria/Submissions/S290_-_Northern_and_Western_Homelessness_Networks_Consumer_Participation_Working_Group_Redacted.pdf>.

up those people who fall through the gaps of all other system.

16,487 people presented to the homelessness service system in Melbourne's west in 2019/20 – these numbers are clearly greater than the numbers of people who are likely to have 'slipped through the gaps' of other systems.

The key role for homelessness support services is to assist people to access long term housing and to address any issues that will impact on the stability of that housing. As a result of the housing crisis in the West, the activity involved in assisting consumers to source affordable housing becomes extremely time consuming, leaving very little capacity for innovative responses to the broad range of issues facing households who have experienced homelessness.

Capacity and demand do not sit within the purview of the Social Housing Regulation Review. However, it is important to note that, If sufficient affordable housing was available in the West, the homelessness sector could return to supporting those who 'fall through the gaps' to access housing. Homelessness support could then be directed to more productive preventative activity, including responsive support to assist people to maintain tenancies.

Responses to key Review consultation questions

What are the most important changes needed to improve social housing?

Provision of support services for those who need it

- The Specialist Homelessness Service system assists individuals and households who are particularly vulnerable. Homelessness is often caused by, and always leads, to an experience of trauma. Homelessness triggers mental health issues for some people and can lead to substance use to manage the associated trauma. These issues, in turn, create additional complexities. Adequate housing first models with ‘wraparound’ support services, are needed to support people whose lives have become chaotic.
- To assist people in maintaining affordable housing tenancies, there must be a recognition that services, government and other stakeholders need to be flexible. People who have experienced homelessness are more likely to have experienced trauma as a cause or consequence of homelessness, either had mental health illnesses, or developed them while experiencing homelessness, have low-income security and face a myriad of challenges¹⁰. Core to assisting consumers to maintain their tenancies into the future is sufficient support capacity to assist consumers to resolve the challenges they have faced and recover from the trauma associated with an experience of homelessness and sufficient flexibility to allow for the fact that this is not a linear process.
- The State Government has taken positive steps to increase tenancy security, however the SHS is still insufficiently funded to provide support for people to maintain tenancies.
- Flexibility is required when attempting to assist individuals in maintaining tenancies is crucial.
- Appropriate and wraparound support should be available for tenants, that has the flexibility to ramp up and down as needed and for as long as needed will significantly increase the likelihood of sustained tenancies.
- Sufficient funding for cross sector support is required to enable tenants to access a range of support services when they are ready, to assist them to stabilise crises.
- Homelessness support services should be sufficiently funded to support consumers for longer periods of time, in order to assist them to stabilise in any new tenancy.
- Place based support can assist tenants to engage with their local community and can respond to changing levels of need for support.
- The system funds homelessness services at the front end and Tenancy Plus when tenancies are at risk – but no-one is funded for proactive support to help people stabilise and maintain their tenancies.
- There are no services in the community sector (outside the NDIS) are funded to provide ongoing support to those people who will always need either a level of support or episodic support.
- Proactive and reactive support – when establishing a tenancy support needs to be proactive. Once a tenancy is stabilised, reactive/episodic support that is easily accessible will assist tenants to address issues before they escalate.
- Sometimes clients don’t want to continue to engage with support services once they access their housing, but they are likely to return to the services that they know if issues arise. Homelessness services are not adequately funded to provide this responsive support.
- Tenancy Plus receives referrals too late in a tenancy that is at risk. When Tenancy Plus works effectively with the Housing Services Officer and the tenant together, improved outcomes are achieved. Housing Service Officers are often more confident in working with tenants when Tenancy Plus is involved

¹⁰ WHN 2019a, p. 3.

- What goes wrong for tenants that requires the involvement of support services? Unaddressed mental health issues, untreated alcohol and other drug issues, a lack of community and safety for individuals. The physical environment in social housing contributes to tenants feeling unsafe.
- One of the most challenging issues to manage is hoarding and squalor. Long periods of engagement are needed to address the underlying issues and hoarding is very costly to address. Very skilled staff are needed to address hoarding and squalor issues. Councils provide limited assistance. The brokerage needed to assist someone to clear up a property is around \$5,000. Many clients are being fined by Councils because they can't maintain property.

Building communities

- When consumers were asked what encourages stability of tenure, a common theme was that “we all need a sense of place and community”. Consumers need the option to access accommodation in their existing community, if they choose it, and accommodation that promotes development of new communities, if they want it.
- When developing new housing developments there are several key features that should be considered and can be altered to create the environment that enables a new community to build and flourish. Innovative housing models, including housing hubs are examples of building design factors that promote community building. For instance, housing that can be designed to have shared outdoor spaces and communal areas encourage residents to interact. The size of a development also affects the community building factor; large public housing estates like the well-known towers in Melbourne’s inner suburbs, create large communities compared to smaller density developments where smaller communities can develop. Communities of both sizes hold merits for different tenants with differing backgrounds. These backgrounds are a key factor in creating communities.
- Smaller developments can be targeted to specific cohorts and designed to address common experiences shared by these cohorts and be tailored towards community building. For example, many women leave family violence accommodation to move into areas in which they don't know anyone. This can leave them, and their children isolated and feeling vulnerable. Innovative housing designs would assist this. Putting three houses on a block with a shared internal courtyard, and a shared laundry/shed on the fourth side of the block would immediately provide women and children with the potential to establish a supportive community. Similarly, most single women, with or without children, feeling vulnerable living alone. Housing that is built with additional security and with the potential for more contact and sharing between tenants, helps to create a greater atmosphere of safety.

How can social housing be more responsive to need?

Access

- Improve the transparency associated with allocations from the Victorian Housing Register. Allocation processes are not clear. Homelessness support services may be supporting two people in very similar situations: one receives a quick allocation of social housing, and one waits for a very long time.
- There is an inequity for people who would be in transitional housing, if there was sufficient available and who can retain their priority access whereas those who cannot access transitional housing, because there is none available, are left to manage in unsustainable rental arrangements and lose their priority status on the Victorian Housing Register (VHR). Access point services can identify that people in this situation are in ‘crisis or THM arranged’ (according to the Housing Guidelines) but this is not often enacted or accepted by Homes Victoria.
- Priority access has been fast tracked for people with a history of sleeping rough who are clients of the Rough Sleeper Initiative. No services in the West receive Rough Sleeper Initiative funding but services are supporting people with a history of sleeping rough. This policy creates inequity for those people with a history of sleeping rough in the West.

- Rooming houses managed by community housing – it is difficult to get transfers for people in rooming houses with bedsits. Is there scope to advocate for transfers to be automatically approved for any accommodation that is classified as a rooming house/bedsit?

Tenancy arrangements/management

- Differences in rental charges in community and public housing. Tenants in community housing pay about \$20 more in rent than those in public housing.
- Recommend more property inspections. Some tenants are living in awful circumstances (i.e. no power for 8 months). It seems that properties have not been regularly inspected.
- Some community housing providers are becoming ‘real estate agents’ and are taking a harsh approach to tenants. Services are increasingly taking a more corporate approach.
- The changes to the RTA have made it very difficult to evict someone from community housing, even if they are having an extremely destructive impact on other tenants. This leads providers to be more cautious. Thresholds for damage and danger are very hard to meet. A higher number of notices are required in response to rental arrears before eviction is possible. Previously some providers used rental arrears as a way of evicting people with problematic behaviour.
- More information about the quality of stock is needed. Some people seek an immediate transfer when they see the quality of stock. Some people don’t want community members to enter their homes because they are ashamed of their accommodation.
- Some neighbourhoods are hostile to social housing tenants. Homes Victoria is spot purchasing accommodation in these areas but there is no system to support tenants to navigate community hostility.
- Often transitional housing is nicer than social housing. It is difficult for tenants to take a step down. This should be reversed.
- Management of body corporates is extremely problematic. The impost of managing this for housing providers and support providers is huge. Often outright discrimination sits behind the high number of body corporate complaints.
- Homes Victoria now has a central call centre, which has reduced the effectiveness of responses as they issues are no longer managed within the community in which they are occurring.

Flexibility and responsiveness in design

- Housing services would be more effective if they more mandated and appropriately funded to adapt to changing client need i.e., if there are changes to cohorts, that allocations are responsive to these cohorts. This would mean that community housing providers have sufficient funding to be responsive to identified need and not to be limited by the funding model.
- Co design and management of social housing, with tenants, will improve the understanding of mechanisms needed to build increasingly responsive social housing models and facilities.

Step down/stepping stones models

- The establishment of a stepping stones approach would be constructive for many young people. We need more supported housing options for young people, that are flexible enough to allow for increasing independence for young people over time. More social housing could be developed using the foyer model: independent living units with onsite support for young people. Many young people need a period of support (around 2 years) to create stability in their lives and to build their living skills, with built in capacity for young people to move to greater independence over time. Such a model is particularly required targetting those young people with entrenched behaviours who will require ongoing support until they are 21 -25 years of age. Ideally this would be a ‘foyer’ model for young people with known problematic/challenging behaviours who have limited ability to access private rental and who are not engaged in education/training, as a result of their experience of trauma

- Stepping stones approaches could also be applied to use of bedsits and community managed rooming houses with onsite support – offering an initial tenancy for single people whilst their situation stabilises, with an automatic transfer approval into independent housing.

Targeted approaches for those experiencing complex issues

- A history of trauma can, for some people, lead to anti-social behaviour. Social housing providers receive high numbers of neighbourhood complaints but don't have sufficient capacity to address the underlying issues causes behavioural issues.

We need more targeted and appropriate responses for people experiencing complex issues that have led to the development of difficult behavioural issues. At present, social housing tenants in this situation either contribute to a poor tenancy experience for other tenants or they are evicted – which doesn't help them or the community. We need housing constructed in a way and in locations that reduce the impact of tenancies on other community members, with linked on site support services to assist tenants to stabilise.

- Many more 'Commonground' models of social housing (stable housing with onsite support, security and allied services) are needed to provide a safe and supportive environment for people experiencing complex issues, who may always need a level of support to assist them to live independently.
- A tenant recently left public housing because she was being abused by other tenants. She reported the issue to Homes Victoria with no outcome.

Target stock to need

- More targeting of public housing: construct housing that responds to the needs of specific cohorts and bring those cohorts together i.e., housing families together and provide relevant facilities. Talk with young people about what appropriate housing would look like for them.
- The community housing funding model precludes access for young people and for those on Newstart. Yet there are no private rental properties in Victoria that someone on Youth Allowance or Newstart can afford. Creating new housing projects which are suited to young people who have or are at risk of experiencing of homelessness is a way to both create a positive community where young people with similar lived experience can create beneficial relationships and reduce homelessness cycles beginning at a young age. These housing developments could be situated near, or contain with employment assistance, and learning options for these young people to engage with and begin to actively contribute to the community.
- There is a lack of social housing stock in the West for single people, for large families, for people with complex behavioural issues and a lack of stock appropriate to young people, particularly those experiencing complex issues.
- 500 young people leave State care in Victoria each year. Research shows that the majority of those people most recurrently homelessness and recurrently incarcerated became homeless before they turned 18 and came from the child protection system. Let's break that cycle! Appropriate, guaranteed social housing for young people leaving care to provide them with the maximum opportunity for housing stability once they leave care.

Culturally appropriate responses

- Improve cultural awareness and sensitivity is an issue within public and community housing providers. Lack of culturally sensitive practice impacts Aboriginal and cultural support workers, as well as tenants.
- Mainstream community housing isn't culturally safe or suitable for many Aboriginal tenants.
- More accommodation is needed that is appropriate to young or older singles – a block of 6 units with an additional unit for 24 hour support staff. This may also allay fears amongst the public.
- Victoria needs a whole of government approach to supporting people.

- Victoria needs a variety of accommodation options i.e., accommodation for women and children leaving family violence – so they re-establish connections in the community and feel safer in their accommodation.

Place based/community model

- Early indications in the newly funded Homelessness to a Home (H2H) initiative – sometimes the community is objecting to construction/lease of social housing in their neighbourhoods. A place based response would assist in managing these neighbourhood issues and tenancy issues, as they arise.

Improving tenant participation/feedback

- The WHN believes in centring the voice of those with lived experience and valuing this lived experience when evaluating both the past performance of the sector and any future policy and operational directions. The Network fully supports the Panel's clear commitment to improve tenant (and prospective tenant) participation in social housing design and management.
- The WHN, in conjunction with the Northern Homelessness Network, has undertaken annual consumer surveys since 2012. To date 1,428 consumers have participated in the annual consumer surveys and their participation is invaluable in guiding both service improvements and direction for advocacy.
- It would be wonderful to raise the standard of tenant input and feedback. Services are often not seeing positive outcomes when raising tenancy issues through Homes Victoria.
- Community consultation processes are needed to design and improve facilities.
- Establishment of place based supports will assist in creating a stronger sense of community for social housing tenants, which may lead to a greater sense of agency and increased participation in tenant consultations.
- Creation of a community awareness campaign promoting the benefits and positive stories of communities already living in social housing to build a greater awareness in the wider Victorian public of the social housing system and its importance to the Victorian community would be a positive step to allow social housing communities to flourish within their spaces and in the wider community. Access to housing is and should be a basic human right. It is important that all Victorians are aware of the benefit to the whole community resulting from provision of sufficient stable and affordable housing for all.