



SUBMISSION

Improving public housing responses strategic project segmented waiting list proposal

March 2010

The Council to Homeless Persons (CHP) welcomes the opportunity to provide feedback on the *New Segmented Waiting List Proposal* (the proposal).

CHP is the peak body representing individuals and organisations with an interest or stake in homelessness in Victoria. Our mission is to work towards ending homelessness through leadership in policy, advocacy and sector development.

Please accept my apologies for the delay in providing our response and its brevity; however I have only recently commenced as Chief Executive Officer at CHP. Unfortunately, the relatively short timeframes for comment combined with my very recent arrival has meant that CHP has not had the opportunity to consult formally with the sector. As such this submission does not hold itself out to capture the diverse perspectives members of CHP may have in regards to the proposals.

In particular we have not had an opportunity to adequately consult on the impacts that the proposal may have upon specific population groups that experience or are at risk of homelessness. Nevertheless we hope that our perspectives on the issues raised in your discussion paper will help inform the future policy.

In this brief submission, we endorse *in principle* the proposal to create one segment for people who are homeless and those experiencing family violence, and to afford this segment the highest priority in allocation of public housing, subject to clarification of several important definitional and procedural issues.

This submission does not endorse the proposal to create a 1a and 1b segment at this stage. The reasons for our concern are discussed in more detail in the body of the submission.

Consistent with CHP values, this submission adopts a human rights framework in examining the issues under consideration. In particular we stress that we do not condone the continuing long waits for public housing for people in housing related poverty, at risk of violence, in overcrowded or otherwise unsuitable housing, including poor quality public housing stock awaiting transfer, and those with urgent medical need.

All of these people have the right to a secure, safe and affordable home. However, in the absence of significant and sustained additional investment in public housing a segmented waiting list remains the most effective rationing device. It does not however provide real solutions to the entrenched disadvantage that those in housing need continue to face while waiting 'their turn' for a secure home.

Nor does it deal with the consequences for the rent roll, and therefore the long term viability of public housing if increasing proportions of tenants are on very low incomes. The fiscal impact of increased targeting must therefore be acknowledged and funds made available over the long term to ensure both the quality and existence of a viable public housing system.

Purpose of the proposal

CHP supports the policy aims of the proposal. Specifically, to make the system easier to comprehend and navigate for applicants and external agencies and to prioritise applicants on the basis of greatest housing need.

We note with concern that since the introduction of the segmented waiting list only 30 per cent of homeless applicants have been approved to segment 1 and that 82 per cent of applicants who are homeless or experiencing family violence are sitting in segment 3. As noted in the discussion paper, this is contributing to blockages in the transitional housing system.

This may be particularly acute in some locations, and among particular population groups. It also comes at enormous personal and social cost to those people waiting for a home.

The model

On this basis we agree with the proposal to create one segment for people who are homeless and those experiencing family violence, and to afford this segment the highest priority in allocation of public housing. That is, to merge segment 1 (recurring homelessness) with segment 3 insecure housing (homelessness), segment 3 unsafe housing (family violence) and some parts of segment 2 (DHS/DOH clients).

We note with disappointment however, that many rooming house residents, including families with children, and those in overcrowded accommodation (who are likely to include Indigenous families, as well as refugee families) will remain largely in situ under the proposal as this category remains as 'inappropriate housing.'

While moving this cohort into segment 2, is an improvement on their current segment 3 status CHP maintains that a rooming house can never be an appropriate home for a child. It is unclear from the proposal document how this issue will be considered under the new model. We further note, that while a person may not have significant support needs upon entering these forms of temporary accommodation the impact of these environments may be extremely detrimental and may in the end lead to a need for support that may not have occurred if a rooming house as last resort option had not need to be taken.

Points of clarification

In providing in principle support, we seek clarification on the following matters:

- How will consistency be guaranteed?

CHP particularly welcomes the commitment to streamline application forms and processes

in order to avoid excessive and intrusive practices, and re-trauma for the applicant.

However one of the current problems reported by some of our members is a lack of consistency by Housing Support Officer's (HSO's) in assessing current applications. Therefore any changes to the application and allocations process will need to include a review of the current definitions of homelessness, in order to ensure consistency in practice at a local level.

A universal framework would need to accompany the changes. This should include concise definitions, clearly articulated roles and responsibilities, complemented by templates and tools for completing applications and undertaking assessments. This will help to ensure that the new allocations system is both easily comprehensible and consistent.

- How will the requirement for people who are homeless to be linked with support to make an application operate for people who are, for whatever reason, outside the human services system?

Although most people will be linked to an service of some description (although not necessarily a homelessness specific agency) many of the most vulnerable people, including those in the most housing need may not be linked to services or may not feel comfortable navigating current entry/access points. These differences may be exacerbated for young people, Indigenous peoples, and are likely to be particularly acute for people who have just become street homeless or conversely have been street homeless for a significant period of time.

- What level of ongoing support will be provided to assist people in sustaining a tenancy once allocated?

Without a significant resource increase for both stock *and* support, the capacity of public housing to respond to the increasingly complex and diverse needs of existing and future public housing tenants is severely compromised. As acknowledged in the 2020 discussion paper, and in the White Paper, people who have experienced homelessness may need significant and sustained support for a longer period that SAAP services have been resourced to provide.

- Will individualized support to sustain tenancies be maintained in the medium/long term?

CHP notes that providing individuals with flexible and personalized support has been proven ability to assist with sustaining tenancies and minimizing churn through the homelessness and housing system. For such support to be guaranteed in practice, an accountability framework that clearly defines and articulates processes for identifying individual's support needs and matching resources to those needs will be need to be included in the reforms. These arrangements must specifically include both lines of responsibility between the housing provider and support agencies complemented by increased capacity to identify issues in tenancy break downs earlier along with longer term resourcing of support functions than is currently the case.

- What will the impacts of the changes be in different localities?

CHP notes the statement on page 7 that the new model will not increase the number of Victorians 'eligible' for early housing. However, it can be assumed that there will be some impact on wait times in different regions, depending upon the pressure on current segment

3 applicants.

Given the concentration of people in rooming houses in some areas, CHP would welcome the opportunity to see the modelling of the impacts of the new segmented list across the regions.

- How will the changes be communicated to current applicants?

CHP is mindful that these changes will inevitably create longer waits for some existing applicants. We reiterate our position that only a significant increase in stock can provide an effective means to dealing with unmet demand for secure, affordable housing in the public and social sectors.

CHP is concerned that the communications strategy deployed does not feed into community stereotypes of homelessness, or to notions of deserving and undeserving categories of peoples waiting for public housing.

Section 2 proposal – segment to 1a and 1b

CHP does not support this second aspect of the proposal at this stage.

While we can see the benefits that a further segmentation would provide in terms of throughput from crisis, refuge and transitional housing stock, we are concerned that an automatic prioritisation may go against the principle of allocation on the basis of highest housing need. Specifically when many people, including women and children, and those with significant histories of trauma and high support needs are still being placed in rooming houses, caravans and other inappropriate settings due to lack of SAAP accommodation.

CHP acknowledges that a release of pressure through faster allocation into public housing would have a flow on effect throughout the system – effectively opening up spaces in transitional housing. While this would be very welcome we remain concerned that those people not engaged with SAAP, or those in non-SAAP temporary accommodation may, in individual circumstances be in higher housing need than those in THM or other SAAP. This may advantage some program clients over others.

In the absence of sophisticated modelling it is also difficult to assess what the impacts may be across different regions, potentially leading to geographic inequity or other unintended consequences including system distortion or perverse incentives to 'go homeless to SAAP' in order to move closer to an allocation.

In summary, the 1a and 1b proposal has merit in terms of facilitating better throughputs through the homelessness/housing system, however it also contains a significant risk of perpetuating housing inequities based on whether a person was 'lucky enough' to secure a THM or other SAAP accommodation compared to others.

In the absence of detailed modelling, CHP does not endorse the proposal to create a 1a and 1b segment at this stage. However we welcome the opportunity to further explore this option with the DHS, subject to detailed consultation with the sector.

Thank you for the opportunity to provide feedback on the proposal. If you have any queries regarding this submission, please contact Michelle Burrell on michelle@chp.org.au or 03 9419 8699.