

3rd edition of the National Community Housing Standards

WA Community Housing Sector Consultation Forum

21st July 2009, Boulevard Centre, Floreat, 9:00am to 4:30pm
Hosted by the Community Housing Coalition of WA

Summary of feedback received at the forum

General comments on the consultation draft

1. The original standards were designed as a quality improvement tool for the sector. In WA at least they are now used as part of the compliance/registration system for community housing organisations (CHOs). This influences the feedback provided. Many people spoke of the need to ensure that language is clear and standards are measurable and realistic - because they will be used to externally assess organisations for registration purposes. This significantly changes the nature and use of the original standards. WA's feedback therefore, is likely to be more detailed than some states where the standards are used to guide good practice, but do not act as an assessment tool for registration.
2. Need better definitions of terms used throughout the document e.g. tenant, organisation. Need to acknowledge that tenants include people under license to occupy, not just tenancy agreements and that not all providers are housing specific organisations - some provide housing as a suite of overall services.
3. Some signposts don't lend themselves to assessment - too vague.
4. Language is not always clear or consistent.
5. Who will 'own' the standards? Where will they be housed? General agreement that the standards should sit/be owned by an organisation like the Community Housing Federation of Australia (CHFA), not within a state housing authority. The third edition consultation draft does not clarify these questions.
6. Will assessors be accredited? The original model had independent accredited assessors in the framework, but no discussion in the draft on how this will work, if it will change etc. General agreement that assessors need to be independent.
7. General agreement that the standards should not be changed in any future editions without wide sector consultation (similar to what has happened in this process).
8. Need more discussion on how services previously called SAAP services, fit within the standards. Some standards and signposts are not easily applicable to supported accommodation services.
9. Which standards will become core to registration and which are desirable but not essential?

10. It is critical for wording to be unambiguous if providers are to be held accountable to meeting the standards. Current language lends itself more to a quality improvement guideline document than a regulatory assessment document.
11. Debate on whether or not the NCHS should be limited to housing specific standards and then link to other standards in areas such as management and human resource management. Why have HR in the standards, for example?
12. Consultation process needs to include discussion on the 'Aims of Community Housing' that sit at the front of the document. A lot of discussion on the extent to which security or choice is a realistic community housing aim. General agreement that the aims are important - but could do with further discussion and clarification.
13. The summary of outcomes of the forum and any supplementary written submissions from the WA community housing sector will be posted on the CHCWA website and provided to the Department for compilation in the overall WA submission. Providers would like to see the final WA consultation submission that is fed into the national consultation. Request that a copy be provided to CHCWA for distribution.
14. *Comment received from written submission after the forum was held:* I think the Manual needs to be a reference work to be really useful. It does not serve this purpose in its present form. My suggestion is that it should have a really good comprehensive index. If you want to know what it says about a particular matter, e.g. Meetings: frequency, annual, composition, recording, etc. it would be much more useable. It was criticised for being too verbose, but on the other hand it does need to be comprehensive. An index would help.

SECTION 1: TENANCY MANAGEMENT

General comments

- Some agencies do have discriminatory practices/eligibility e.g. only house people with disabilities, age etc.
- Overall agreement with this section and the changes proposed.
- Need to recognise non RTA agreements e.g. license to occupy.
- How would some of the standards apply to common waitlist systems?
- Need to acknowledge waitlist needs of specific subsets in the sector e.g. co-ops.

Standard 1.1: Allocation of Housing

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

- 1.1: 'local housing needs' requires a definition or should be removed and put as a strategy, rather than a signpost.
- 1.1.1: include, 'with stated aims of the organisation'.
- 1.1.1: Change Board involvement from 'should not be involved' to 'will not be involved'. Perhaps also included 'have no influence' in allocation, not just 'not involved'.
- 1.1.3: Some circumstances where interview is not possible e.g. crisis accommodation.
- 1.1.4 and 1.1.5 should be around the other way.
- Tenants are selected 'openly' - what does this mean?
- What happens if 'local needs' and agency priorities are in conflict with the department regulations and policies?

Standard 1.2: Establishing and Maintaining Tenancies

The organisation is tenant focused and works with tenants to establish and maintain successful tenancies.

- General: Focus is on tenant rights, no mention of responsibilities.
- 1.2.1: should include: advise tenant of responsibilities as well as rights.
- 1.2.2: compliance cost here. Try to use other agencies or services for translation.
- 1.2.3: need to include guardians and advocates, as appropriate.
- Not all organisations can collect bonds.
- If you can't find appropriate govt. service/resource, there's a cost involved. Case management and communication issue.
- Sign posts are quite prescriptive.
- 1.2.5: management of rent arrears is a bit confusing here.

Standard 1.3: Changing Needs of Tenants

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

- 1.3: need to clarify status of carers who are not partners.
- Agree with additions in 1.3.1 - need to have exit strategy.
- Situations are difficult and you can't always use a checklist to determine whether someone should stay.
- 1.3.2: if this is under Asset Management, why is it duplicated here?

Standard 1.4: Ending Tenancies

Tenancies are ended in a way that accords with the law and minimises the impact on the organisation and tenants.

- Changes about recording and documenting are needed in case you go to court. Good additions.

SECTION 2: ASSET MANAGEMENT

General comments

- Overall, good and aligns with current practice.
- Department would have to amend headlease agreements to comply with the standards. Some are difficult to apply to headlease arrangements.
- It would be good to have signposts under each standard at the beginning of the section i.e. group signposts.
- No real mention of co-op specific strategies for Asset Management, unlike other sections - need to include.
- All standards too wordy, vague. Should be clear, concise and non-prescriptive.
- The types of asset management systems can be different across different organisations, as long as the outcomes are the same i.e. sound asset management.

Standard 2.1 Asset Management Strategy

The organisation has plans in place to ensure housing assets are managed to deliver the optimum return in terms of financial investment, service delivery and meeting housing need.

- 2.1: what does 'optimal' mean? Open to interpretation. Needs clear outcome.
- 2.1.1: implies that the agency owns the property.
- 'The aim of an Asset Management Strategy (AMS) is to help an organisation manage its property assets in a way which *meets housing need but also maximises financial return*'. substitute with 'to meet housing needs and service delivery in a financially sustainable manner'
- 2.1.3: may need to be more frequent than an annual review (this is a minimum). Perhaps 'rolling' reviews.
- 2.1.4: add that for small organisations, a spreadsheet system is fine.

- Too prescriptive. Text is too verbose - needs dot points.
- 2.1.5: as a broad statement it's fine, but pitched to larger players. Needs examples for smaller players.
- Assessment of appropriate location is often waitlist driven rather than other factors.
- Does not refer to tenants needs enough - link between Asset Management and Tenant Participation.
- Need to recognise government's obligation to hold up their end of agreements.

Standard 2.2: Responsive Maintenance and Repairs

The organisation's systems enable the effective delivery of repairs and maintenance so that tenants' homes are well maintained and the organisation's assets protected.

- 2.2.4: change to 'organisation can work with tenants to...' add 'where appropriate for the tenant group'.
- 2.2.5: implementation comment: stock condition surveys have a cost implication for agencies without the skills inhouse.
- 2.2.6: implementation comment: some agencies do not always have much choice in relation to contractors, depending upon location and economic climate e.g. recent WA boom reduced choices in contractors.
- 2.2.6: see section on 'Agreements with a private landlord or Department'. Should include reference to joint responsibility with Department. Add statement that Department should be pro-active in knowing contractual requirements, legislation etc.
- 2.2.7: these targets are unrealistic goals for many providers e.g. less than 2% of repairs are subject to rework.

Standard 2.3: Planned Maintenance

The organisation plans for the maintenance and upgrade of its assets to ensure accommodation quality and overall value is sustained.

- 2.3: remove wording 'overall value' - not clear what this means.
- 2.3.2: add 'and their general wellbeing' after the text that reads ' Priority should be given to enhance the safety and security of tenants..'
- 2.4.6: add 'with an agreed exit strategy'.

Standard 2.4: Acquisition and Development

The organisation acquires and develops new and existing housing stock in accordance with strategic growth objectives and to meet identified need.

- See underlined above - identified by who?

- Sits better as part of a SLA. Small providers may not have growth plans.
- 2.4.1: disposal - what about the need of the tenant in disposal decisions?
- 2.4.3: see 'The organisation should aim to acquire properties that need minimal maintenance for 5 years' - this is usually unrealistic.

Standard 2.5: Partnerships and New Business

The organisation's growth strategy is based on sound financial planning.

- This does not apply if the agency does not have a growth strategy - may sit better in a relevant SLA?

SECTION 3: TENANT RIGHTS AND PARTICIPATION

General comments

- Difficult to get tenants interested in participation.
- Hard to meet targets of tenants having a say in organisational decision making. More likely to be on a one-on-one basis and focused on tenant needs as they arise.
- Hard if agency targets tenants with an intellectual disability. We are monitored by Disability Services Commission - seek assistance from them.
- Need to have definition of tenants e.g. include residents (license to occupy), clients etc. The section moves from using terminology 'tenant' to 'service users'. Confusing.
- Need to include section on tenant responsibilities as well as rights.
- What rights exactly does this standard refer to e.g. RTA, human rights? Undefined.
- Different opinion on the place of tenant participation in Boards.

Standard 3.1: Tenants' Rights

Tenants' rights are respected throughout the organisation's work and those who access the organisation are assisted to exercise their rights and responsibilities.

- 3.1.1: good to include use of an advocate

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.

- 3.2.1: some things are the organisation's responsibility - not tenants. Too ambiguous. The word 'organisation' needs to be better defined - some organisations have housing provision as a small part of the overall operations. Be explicit about tenant participation in housing related service arm of organisation.
- 3.2.4: need to acknowledge that housing is only one part of some larger organisations - more geared to small housing specific agencies. Ambiguous.
- Who bears the cost of tenant meetings?
- 3.2.5: need to include a mechanism for supporting and educating tenant reps and that this is endorsed through budgetary measures. Need to show that it is not only ok to spend on tenant participation, but necessary.

Standard 3.3: Participation in Tenant-run Co-operatives

Co-operative members are selected, trained and supported to maintain a sustainable organisation.

- 3.3.2: need to use term other than 'Board', as some groups, e.g. co-ops do not have Board meetings.
- 3.3.3: third dot point - add 'purchase service, *where appropriate*, from other organisations'.
- 3.3.5: include exit interviews as a dot point.

Standard 3.4: Access to Services of the Organisation

Applicants, tenants and service users are given opportunities to access a range of services appropriate to their needs.

- Too vague - what services and what needs? Too broad.
- Does it refer to services offered in house or external services? Each organisation is different in what it can offer.
- Suggests that the agency itself is providing a range of services - not always the case. Suggest that we should be providing more than we are.
- Define term 'service users' or take it out - too ambiguous.
- Reword to include idea that support services can come from agencies external to the housing provider.
- This standard is difficult to meet - depends upon level of external support services - much of it is out of the control of the housing provider. Not sure if this standard should be here in current wording.

Standard 3.5: Confidentiality and Privacy

Applicants' and tenants' confidentiality and privacy is respected and maintained.

- Straight forward - good practice.

Standard 3.6: Complaints and Appeals

Complaints and appeals of decisions are addressed promptly and fairly

- Definitions are good and clear.
- What about when tenant bypasses the internal procedures and goes straight to external avenues?
- 3.6.1: use term tenant/applicant rather than applicant in text under 'Good Procedure'.
- Use terminology complainants, appellants etc where appropriate.

SECTION 4: WORKING WITH THE COMMUNITY

General comments:

- Difficult to provide a house for tenant as well as position in the community - i.e. both community development officer and housing officer. These roles should be separate but not all providers have the resources, funding or capacity to do both.
- This standard is difficult for small providers who just provide housing. If this standard is the expectation, then it needs to be properly funded.
- Add in a standard such as 'community engagement' which could provide a model for CHOs to fit in and thrive within the community.
- Put in standard relating to boosting the profile of CH providers.
- CHOs need to know their community.
- Also about shifting negative community attitudes about social housing. Include standard or signpost on presenting positive aspects of CH to the community e.g. marketing strategies.
- Need to focus in integrating tenants - not exposing them.
- Issues of conflict of interest between support and housing functions.
- Emphasis that housing needs to be located near support services.
- Needs to address cultural differences in living and expectations. Needs to promote acceptance of difference and diversity.

Standard 4.1: Tenants' access to support

Tenants have access to relevant support to help manage and maintain their tenancy.

- See comments above, about capacity and resourcing

- Place tenants according to where local services are located, so that their needs are more easily met.

Standard 4.2: Building community capacity

Work undertaken by the organisation contributes to sustainable improvements in the well-being of tenants and communities.

- Depends on skills and resources.
- This would put on a strain on the workload for some providers.
- This is what makes CH different from state housing.
- Need to keep support and housing roles separate. Has funding implications.

Standard 4.3: Providing housing information, advice and referral

Community members accessing the service are given up-to-date information and referral that assists them to find safe housing options.

- Requires funding.
- Could imply that tenants don't have the skills to engage with services and community themselves.

Implementation comment:

- Please provide training on this entire topic. Would be very useful, especially about marketing strategies working in the community.

SECTION 5: GOVERNANCE AND ORGANISATIONAL MANAGEMENT

General comments:

- Large organisations have good governance in place, whereas (some) small providers could benefit from this section.
- Generally too prescriptive and wordy - even for small providers.
- Some sections are repetitive - needs to be re-worked.
- Need to define terms and use consistently throughout e.g. Board or Committee. Interchanging terms becomes confusing.
- Include mechanisms to communicate ideas/decisions to the organisation as a whole.

Standard 5.1: Establishing and maintaining governing bodies

Members of the organisation's governing body have the skills and experience needed to fulfill their obligations and establish and oversee the strategic direction of the organisation.

- Make more concise and less wordy e.g. finish at 'experience'.
- 5.1.1: add 'incorporated' to term 'housing association'.
- 5.1.2: finish at 'expertise'. Outcome more important than commitment.
- Size of organisation will determine what signposts apply but guidelines still hold.

Standard 5.2: Good governance

The organisation has a clearly defined purpose and goals and is accountable for all aspects of its work.

- Shorten by stopping at 'goals'.
- 5.2.3: a strategy for 5.2.2.
- 5.2.4: subset of 5.2.3.
- 5.2.6: repeats 5.1.6.

Standard 5.3: Effective management

The organisation is managed to ensure accountability and deliver outcomes consistent with their aims and objectives.

Shorten by stopping at 'accountability'.

- 5.3.1: delete 'governing body'.
- 5.3.2: use term 'vacancy rate' rather than 'void levels'

Standard 5.4: Business Planning

The organisation has plans in place which outline objectives and specify how resources will be used to achieve such aims.

- Shorten by changing to '...plans in place to achieve its objectives'.
- 5.4.4: agree with word 'organisational' but not always used in the standards, sometimes uses term 'governing body' etc. Be consistent.

Standard 5.5: Organisational review

Regular evaluation and review ensures that the organisation is working efficiently and effectively towards achieving its goals.

SECTION 6: MANAGEMENT SYSTEMS

General comments:

- No discussion in this section about 'firewalling' support from tenancy management. Is it elsewhere i.e. financial sense?
- Opinion of a number of participants is that Section 6 should not be the standards. Management systems is a non-core function. It is expected of all of us that our management systems should meet contemporary accounting and management standards.
- This section should put forward non-prescriptive guidelines that could capture the essences of the earlier version.
- Perhaps sits better as a signpost of governance than stand alone section?
- Why not just link to Australian standards e.g. accounting than re-invent the wheel or repeat?

Standard 6.1: Financial Systems

The organisation's financial systems enable effective financial control, management, accountability and long term viability.

- 6.1.1: some felt that this was too prescriptive, shoehorns into a particular framework. Either add other examples, change language to be more inclusive and reduce prescription.
- Reflective of current practice of growth providers.
- Simplify - too verbose at times.
- 6.1.2: like recognition of size in discussion.
- 6.1.4: comment about non-cash systems should include where convenient for the tenant.
- 6.1.5: misappropriation and fraud are two different concepts e.g. using rental surplus to prop up support is not fraud - it is misappropriation.
- Change language to reduce prescription.

Standard 6.2: Administrative Systems

The organisation's administrative systems support effective management and accountability.

- 6.2.9: preferably off site not necessarily off site.

Standard 6.3: Management Information Systems

Information about the organisation's activities, applicants, tenants and staff (where applicable) is used to support management of the organisation.

Standard 6.4: Office Environment

The organisation's office premises and equipment provide a safe, secure and appropriate work environment for staff and tenants.

Standard 6.5: Environmental Sustainability

The organisation works to improve the environmental sustainability of its operations, homes and assets and reduce its carbon footprint.

- Need to look at financial incentives to meet this standard e.g. ability to use rental surplus. Need for Departments to make allowable expenditure.

SECTION 7: HUMAN RESOURCES MANAGEMENTGeneral comments:

- Not appropriate as a stand alone section. Make it an extension of section 5/6.
- This is a signpost of good practice under management.
- Duplicates what is already legislated in parts.
- Could be included as part of a referencing manual or appendix to the standards.

Standard 7.1: Recruiting, selecting and appointing staff

Staff are appointed to the organisation with the skills and experience needed for their work and for their ability to contribute to the overall strength and direction of the organisation.

Standard 7.2: Staff management and development

Staff are managed within a framework that assists them achieve their objectives, develop their skills and contribute to the overall goals of the organisation.

Standard 7.3: Employment systems

The organisation has fair and effective systems to support its employment role.

Standard 7.4: Occupational health and safety

Staff and volunteers work in a safe and healthy environment.

Standard 7.5: Management of volunteers

Volunteers are supported to do their jobs well and safely.

Attendees

Mal Douglas	Aboriginal Housing Dev , Com Housing Ltd
Liz Waterhouse	Acess Housing Australia
Helen Deakin	Activ Foundation
Mark Goerke	Anglicare
Kris Robertson	ASWA
Michael King	ASWA
Andrew Arthy	ASWA
Steve Pannell	Austim Assoc of WA (Inc)
Mike Brown	Bethanie Housing
Steve Becsi	Bethanie Housing
Tony Moore	Bethanie Housing
Diana Allen	City of Bayswater
Carol Wainwright	City of Bayswater
Paul Ryan	Community Housing Ltd
Mick O'Loughlen	FOHCOL
Elizabeth Cheong	FOHCOL
Kiarina Wan Kader	Fremantle Multicultural Centre
Tabitha Werder-Bigham	Hills Community Support Group Inc
Coralie Flatters	Hills Community Support Group Inc
Roma Lewi	Melville Mews
Dorothy Baker	Melville Mews
Ravi Lingham	Outcare
Manoj Madanjit	Richmond Fellowship of WA Inc
Ali White	Southern Cross Care (WA)
David Blackie	Southern Cross Care (WA)
Ron Howard	St Briget Convent of Mercy
Victor Crevatin	St Patrick's Community Support Centre
Don Tunnicliffe	Swan Emergency Accommodation
Margaret Muntinga	Unitingcare West
Rachel Partington	Unitingcare West
Colin Mc Clughan	CHCWA
Daniel Guise	CHCWA
Tony Whitbread	CHCWA
Gerhard Rousseau	CHCWA
Alice Hennessy	CHCWA
Christina Kadmos	Facilitator