



Community Housing
INDUSTRY ASSOCIATION

September
2020

CHIA Submission

National Disability Strategy Position Paper

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Introduction

CHIA is the peak body representing not -for-profit community housing organisations (CHOs) across Australia. Our 170+ members manage a \$40 billion-plus portfolio of more than 100,000 homes, housing people on low incomes, disadvantaged in accessing suitable accommodation in the private market.

The Community Housing Industry Association (CHIA) welcomes the opportunity to make a submission to the National Disability Strategy Position Paper.

The community housing industry provides one in four of Australia's social rental properties, complementing public housing. CHOs manage a \$40 billion-plus portfolio of more than 100,000 homes, housing people on low incomes disadvantaged in accessing suitable accommodation in the private market. Our 170-plus CHO members include the largest (managing over 10,000 dwellings) to those with less than 100 homes. Our members provide a diverse range of housing for Aboriginal people, people with disabilities and the formerly homeless. In recent years allocations to community housing tenancies have predominantly been to households classified as 'priority need'¹. At least 30% of community housing households include at least one person with a disability. Just over a quarter of households include a person aged 65 or older. There will be some overlap between the two categories.²

CHIA's short submission is made in part to encourage a stronger focus in the new strategy on the housing needs of people with disability. Safe, secure, suitable, and affordable housing is essential for everyone and enables individuals to realise their full potential. People with disability face particular hurdles to securing housing because of discrimination, lower incomes, and inaccessible properties. Strong direction through the new strategy is essential if improvements are to be made.

While the 2010-2020 strategy contained proposals to both improve the accessibility of housing and reduce the number of people with disability experiencing rental stress, progress on both fronts has been limited. While the funding of specialist disability accommodation through the NDIS will assist those individuals with the most severe needs, this is a small proportion of those in unsuitable and / or unaffordable housing. Information about the current shortfall and projected future housing needs for people with disability is patchy but what exists illustrates the severity of the problem. In *NDIS, housing assistance and choice and control for people with disability*³ the authors noted that 'there is an estimated unmet need in affordable housing for between 83,000–122,000 NDIS participants at full rollout of the scheme in 2019'.

Finally, we accept that this position paper is concerned to seek views on 'the proposed architecture of the new Strategy' rather than outline the current situation and seek ideas about specific initiatives. We have therefore followed the proposed structure in the paper for our responses.

CHIA would welcome being involved in the development of the strategy and looks forward to understanding what the next steps will be.

What should we carry forward from the current Strategy into the new Strategy?

Vision

CHIA supports the slightly amended vision statement “**an inclusive Australian society that enables people with disability to fulfil their potential as equal members of the community**”

Outcome Areas

CHIA accepts that there has been broad support for the six outcomes as outlined below. These are:

1. Inclusive and accessible communities
2. Rights protection, justice, and legislation
3. Economic security
4. Personal and community support
5. Learning and skills
6. Health and wellbeing

Question 1:

Do you have any comments on the vision and outcome areas being proposed for the new Strategy?

Our concern is that housing should be more prominent and not subsumed within outcomes 1 and 3. We would prefer to see ‘Access to Suitable Housing’ singled out.

What improvements are we going to make to the new Strategy?

It is proposed that the new Strategy will include a set of guiding principles for the development of policy and design of programs and an increased focus on community attitudes.

Question 2:

What do you think about the guiding principles proposed here?

To the list we would add one further principle i.e. that the strategy is based on a sound understanding of the current position in terms of service availability / performance / outcomes and the future needs and aspirations of people with disability.

The 2010-2020 strategy while National in scope was largely silent about how location / geography might impact on needs and solutions. State upfront that the needs of people with disability in regional and remote areas will be specifically addressed.

An increased focus on community attitudes

Question 3:

What is your view on the proposal for the new Strategy to have a stronger emphasis on improving community attitudes across all outcome areas?

CHIA suggests that the focus should be broader than the community and include government, not for profits and commercial businesses. There should be more emphasis on countering misconceptions about costs and difficulty associated with changes. In our own field there are reservations in industry and the community about the costs associated with moving to more accessible housing. Given that housing built by or funded by Commonwealth, state and territory governments is generally built to at least Livable Housing silver standard there is more that could be done to overcome resistance to change. Governments could be more vocal about their own achievements and supporting / incentivising industry to raise standards.

Strengthening Accountability

CHIA supports the proposal to enhance government accountability by:

- clearly describing the roles and responsibilities of government, including that of the NDIS
- measuring outcomes
- reporting on outcomes
- committing to the collection of relevant data to enable effective monitoring and reporting
- having a coordinated approach to the evaluation of policies and programs.

Question 4

How do you think that clearly outlining what each government is responsible for could make it easier for people with disability to access the supports and services they need?

Outlining responsibilities is important but initially there are some areas where responsibility / accountability is currently unclear such as (in our own field, housing) that require clarification

- Research into housing needs and demand for people with a disability
- Provision of information about both accessible and adaptable housing
- Development of a housing strategy for people with disability that includes those individuals not eligible for specialist disability accommodation.

Question 5

How do you think the Strategy should represent the role that the non-government sector plays in improving outcomes for people with disability?

While it is possible to include non-government sectors in the strategy, without a statutory or regulatory responsibility to deliver, their role will be voluntary and thus difficult to account for. The strategy should make clear where obligations exist, as distinct from where participation is voluntary. In the case of voluntary activity, the strategy will need to explain how organisations will be persuaded to act.

The community housing sector is regulated and thus has standards it is required to meet. In addition, we are working on additional more aspirational industry standards to set out how we deliver services. With government support we would be keen to develop an industry standard for disability housing that:

- defining minimum expectations through to what constitutes excellence
- considering tenancy management responses that are standard for any household through to enhancements required for people with complex needs

- likely directions and support for tenancy management, assessment management and property standards

The 2010-2020 National Disability Strategy made several commitments. In our own field, housing there seems to have been little progress. Policy Direction 3 in ‘Inclusive and accessible communities’ aimed for ‘Improved provision of accessible and well designed housing with choice for people with disability about where they live’ and committed to support an agreement between housing industry, community and human rights leaders to a strategic plan to provide minimum accessibility in all new housing by 2020, with interim targets to be reviewed every two years. Clearly this has not been achieved.

Under Policy Direction 3 in economic security ‘*Improve access to housing options that are affordable and provide security of tenure*’ commitments were made to:

1. Develop innovative options to improve affordability and security of housing across all forms of tenure.
2. At the review points of the National Affordable Housing Agreement and related National Partnership agreements, parties agree to consider including strategies consistent with the Strategy, to ensure they address the housing needs of people with disability.

These two commitments were not progressed.

What was lacking were clear action plans to support the objectives, with lead responsibility, allocated resources, and regular reporting of progress.

Question 6

What kind of information on the Strategy’s progress should governments make available to the public and how often should this information be made available?

The options outlined i.e., the Ministerial Council and / or a two-yearly progress report would give a high-level view but would need to be supplemented by the targeted action plans suggested.

In addition to measurable targets there should be information about the baseline position, which in housing is, as noted, above largely unknown. The National Housing Finance and Investment Corporation with its role to undertake research into housing supply and demand could usefully focus one report on this topic.

We support the concept of evaluative studies. This could be broadened to include assessment of potential policy, service, and design innovations. We would be keen to see a focus on innovative housing design. In our Federal government pre- budget submission in December 2019 we suggested establishing *a national research centre on contemporary housing for people with disability* to measure outcomes, share technology and design innovations and promote best practice.

Putting policy into action to achieve outcomes for all people with disability

Question 7

What do you think of the proposal to have Targeted Action Plans that focus on making improvements in specific areas within a defined period (for example within one, two or three years)?

This seems a sensible approach.

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Question 8

How could the proposed Engagement Plan ensure people with disability, and the disability community, are involved in the delivery and monitoring of the next Strategy?

This could be achieved through supporting advocacy groups.

References

¹Report on Government Services 2020. Note that figures for 2018/19 were distorted by NSW where tenancies transferred to community housing providers were classified as new allocations. In the previous three years allocations to priority need households ran at over 80% - higher than for public housing.

² <https://www.aihw.gov.au/reports/housing-assistance/housing-assistance-in-australia-2020/data>

³ Wiesel, I., Habibis, D. (2015) *NDIS, housing assistance and choice and control for people with disability*, AHURI Final Report No. 258, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/final-reports/258>.