



**Community Housing**  
INDUSTRY ASSOCIATION

September  
2021

# CHIA Submission

## An Ordinary Life at Home

NDIS Consultation Paper



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# NDIS Consultation Paper – An Ordinary Life at Home

CHIA is the peak body representing not -for-profit community housing organisations (CHOs) across Australia. Our 150+ 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.

## Introduction

The Community Housing Industry Association (CHIA) welcomes the opportunity to make this short response to the NDIS Consultation Paper, 'An Ordinary Life at Home'. 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. While we acknowledge that the NDIA's remit does not extend to fixing all the housing issues faced by NDIS participants it can use its expertise and connections to influence other parts and levels of government to take action in areas they control. Strong direction through the new National Disability Strategy is essential if improvements are to be made.

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 members provide a diverse range of housing for Aboriginal people, people with disabilities and the formerly homeless. At least 30% of community housing households include at least one person with a disability.<sup>1</sup> In recent years allocations to community housing tenancies have predominantly been to households classified as 'priority need' a category which includes severe health and disability issues. Regrettably, data is not reported on the breakdown of allocations within the priority need category. At 30 June 2020, 39 CHOs had registered as SDA providers, though not all had developed accommodation at this point. Worth noting is that to date, two CHOs, BlueCHP and Summer Housing have been the largest providers of new SDA housing.

The community housing industry is ideally placed to deliver quality housing options to people with disability. Not only, are many experienced developers of new accommodation but we have the long running expertise of providing responsive tenancy management services to vulnerable households. We also work collaboratively with other sectors including support agencies and government. CHOs are also required to be registered in at least one of the three regulatory regimes operating across Australia. Annual compliance assessments against performance standards that include tenancy and asset management, community engagement, governance and financial viability provide assurance to our tenants and other stakeholders.

We understand the paper has been structured to encourage participants, families and carers. In CHIA's short submission we are solely focused on those areas where we have specific expertise and can provide an informed practitioner perspective. While we mention SDA, we recognise this option is not one most NDIS participants can access. Our main focus is on mainstream social and affordable housing options for people with disability.

Our recommendations are summarised below:

1. That the NDIA set up an appropriately constituted advisory group to oversee the collection, analysis and publication of data about housing needs.
2. The NDIA and/or DSS should commission research to demonstrate the benefits (including savings on support) that would be achieved through providing suitable housing
3. The NDIA should advocate for the housing needs of NDIS participants with government departments and agencies responsible for mainstream housing,
4. The NDIA and DSS should co-ordinate an expert group to help it develop a strategic response to the non-SDA housing challenge for NDIS participants. The process could be driven by the Disability Reform Council
5. Measures to help NDIS participants in severe housing stress should be investigated, possibly through providing a top up payment to bridge the gap between the market rent and what an individual can afford to pay from their disability support payment.
6. There is significant opportunity to build the capacity of individual registered community housing organisations to play a market stewardship role by facilitating access to a broad range of housing providers
7. NDIA with DSS should explore the potential for development of accessible housing registers in Australia through initial piloting in one State or Territory
8. The NDIA and DSS should support the development of a community housing industry standard for disability housing that defines minimum expectations through to what constitutes excellence
9. *A national research centre on contemporary housing for people with disability* should be established to measure outcomes, share technology and design innovations and promote best practice
10. The NDIA should be working with the States and Territories to support the redevelopment of their SDA assets where they are no longer fit for purpose.

## Housing Need

While the funding of specialist disability accommodation through the NDIS will assist those individuals with the most significant functional and support needs in the housing, this is a small proportion (as the paper acknowledges) of those in unsuitable and / or unaffordable housing. By your own estimates 'as at 31 December 2020, there were 76,062 plans with a 'Where I Live' goal identified, ..... 17.6% of total NDIS active participants'.

Publicly available information about the current shortfall and projected future housing needs and aspirations for people with disability is, however, extremely patchy. Information that provides a strategic overview of needs at the national, state / territory and regional levels would allow individual SDA accommodation providers to plan ahead, but would also inform the development of broader national and

state / territory housing strategies. In addition, it would assist organisations responding to social and affordable housing programs (such as the Victorian Government’s Big Housing Build) to tailor their proposals to better meet the needs of NDIS participants. Last but not least it would also inform the new National Disability Strategy and ensure that its housing actions are properly targeted.

The NDIA has an important role to play informing housing policy responses to housing needs for NDIS participants. Through the development of the [National Disability Data Asset](#) the agency is well placed to analyse, make accessible, and publish data on an annual basis on housing needs; perhaps in collaboration with the AIHW. As a first step the information held in the 75,000 plus plans should be reviewed to identify the data that is available for categorisation and which would assist in strategic planning such as

- location, size and type of accommodation needed
- employment status
- household characteristics

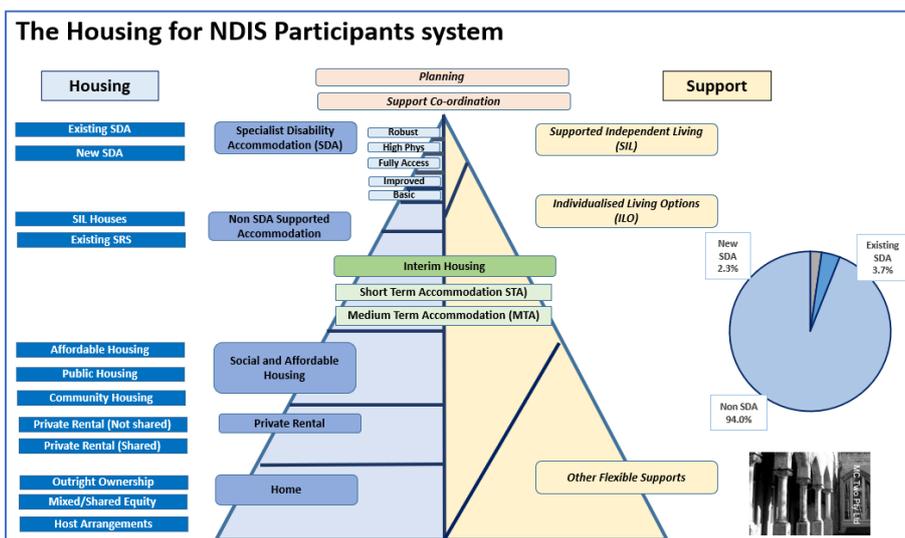
This will also be invaluable information to inform how the NDIA ‘could use policy and pricing as a way to drive the (SDA) market’.

**Recommendation 1:** That the NDIA set up an appropriately constituted advisory group to oversee the collection, analysis and publication of data about housing needs.

### Working with Government and other Actors to increase non-SDA housing options

Of those NDIS participants seeking support through a home and living plan to improve their housing situation, the vast majority (94%) are not living in SDA. Figure 1 overleaf illustrates the variety of housing options potentially open to NDIS participants. It explains the importance of the NDIA engaging directly with other government and industry actors to increase accessibility by NDIS participants to these options. Given very low employment rates of NDIS participants, it is probably reasonable to assume most seeking housing will have low incomes and need social and affordable housing. While as noted earlier little data is available, research conducted in 2015 *NDIS, housing assistance and choice and control for people with disability*<sup>2</sup> suggested that there was ‘an estimated unmet need in affordable housing for between 83,000–122,000 NDIS participants at full rollout of the scheme in 2019’.

Social and affordable housing is in extremely short supply across all parts of Australia. Perhaps the most



meaningful measure of this lack of social and affordable housing in Australia, is the long-term reduction in supply. Taking into account both public housing and community housing nationally, the gross number of social rental lettings dropped from 52,000 in 1997

Source: Joseph Connellan **MC Two Pty**

to 35,000 in 2017 – an absolute decline of a third<sup>3</sup>. Pro rata to population, this represents an effective reduction in social housing supply of some 50%. This has resulted from the virtual cessation of new construction, as well as from the diminished number of existing social rental homes becoming available for re-letting each year – this, in turn, reflecting the declining proportion of existing tenants with the capacity to transition into the private market.

Compounding this overall shortage in social and affordable housing is that many of these dwellings may be unsuitable and / or inaccessible for people with disabilities.

While the NDIA is not responsible for planning, funding or administering social and affordable housing it can still play an important role by using the information it holds. Individuals are not able to realise their goals without a quality housing solution. The NDIA with its connections can illustrate the need for affordable and accessible housing by NDIS participants to the government departments and agencies at both the Commonwealth and State and Territory Governments.

In addition to collating information on housing need mentioned earlier, the NDIA and/or DSS as the policy agency should be commissioning research to demonstrate the benefits (including savings on support and the achievement of an individual's goals) that would be achieved through providing suitable housing.

**(Recommendation 2)**

More appropriate home and living arrangements will result in reduced health and support costs for NDIS participants and increase their opportunities for social and economic participation – access to affordable housing will result in reduced costs in other support systems. Infrastructure Australia in its 2021 Australian Infrastructure Plan has recommended that *'there need to be more fully developed business cases that capture and assess the wider societal and economic benefits of social and affordable rental housing programs'*.<sup>4</sup>

The NDIA should both advocate for the housing needs of NDIS participants with government departments and agencies responsible for mainstream housing, making this commitment in its own plans and, also build the evidence base to demonstrate that investment in social and affordable housing is not an impost to governments. **(Recommendation 3).**

The 2010-2020 National Disability Strategy pledged but failed to progress several housing commitments. 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.

The NDIA, we trust has already made a strong case for housing commitments and targets to be included in the new National Disability Strategy. With the Productivity Commission about to launch their review into the current Commonwealth / State Housing agreements (the National Housing and Homeless Agreement – NHHA) prior to their renegotiation during 2022/23, the NDIA has an opportunity to prepare its evidence and ensure that people with disability are accorded priority in the new agreements.

The NDIA should also be engaging through its local offices with State and Territory housing colleagues to provide data and information to assist with respective housing strategy development. While the need to provide housing for people with disability is may be acknowledged as for example in the NSW Housing Strategy<sup>5</sup> there are rarely any specific actions to address the need. The NDIA is in an excellent position to provide State and Territory governments with information to assist their strategic planning to recognise the housing needs of people with disability.

Addressing the existing shortfalls in social and affordable rental housing for lower income households will take time. Interim measures to help NDIS participants in severe housing stress should be investigated, possibly through providing a top up payment to bridge the gap between the market rent and what an individual can afford to pay from their disability support payment. **(Recommendation 4)**

We recognise there are existing consultative forums for SDA. However, given the NDIA does have some responsibility for assisting participants to meet their housing goals though Home and Living funding of supports, we believe the agency in conjunction with the DSS is ideally placed to co-ordinate an expert group to help it develop a strategic response to the non-SDA housing challenge for NDIS participants. This group can be drawn from industry, other parts of government and participants. The process could be driven by the Disability Reform Council given the need for Commonwealth and State / Territory co-ordination and the Council's role in disability policy and implementation **(Recommendation 5)**.

## Navigating the Housing System

Given the relative absence of information about housing that is suitable for people with disability together with its actual scarcity there is merit in the consultation paper focusing on how to improve mechanisms to assist NDIS participants to navigate housing systems. This includes increasing the capacity and capability of local area co-ordinators (LACs), Community Connectors, and Support Coordinators to assist NDIS participants identify housing options and plan their housing.

Individuals will need information and connections to enable them to assist their participants beyond SDA and other NDIS funded housing options. The NDIA should be facilitating these connections and exchange of expertise with local housing and homelessness organisations, funding services where this is needed to train, assist with housing assessments etc. It is worth noting that some 35,000 people with disability are already housed by CHOs. There is a significant opportunity to build the capacity of individual registered community housing organisations to play a market stewardship role by facilitating access to a broad range of housing providers. **(Recommendation 6)**.

NDIS participants can access information about SDA and other disability housing options through search websites The Housing Hub and Nest, and more recently the NDIA's SDA Finder.

But an ongoing challenge for people needing accessible housing is the invisibility of housing in the private market with accessibility features. Within the social housing sector, neither state housing authorities nor community housing organisations make information available about the location of accessible properties.

Accessible housing registers help widen the information available about potential housing options for people with disability in mainstream markets. One international example is the London Accessible Housing Register<sup>6</sup> which has been in place for 15 years and was the subject of a favourable evaluation in 2011<sup>7</sup>. Initially piloted by two London Borough Councils it involved the development of improved property survey methodologies to identify accessible and adaptable homes which then enabled better targeting of allocations. The evaluation found that one of the Councils – Kensington and Chelsea ‘more than doubled the number of lettings involving disabled people appropriately rehoused from 5% to 12% of total council lets’.

Development of accessible housing registers should be further explored in Australia to increase information about housing options for people with disability.

NDIA with DSS should explore the potential for development of accessible housing registers in Australia through initial piloting in one State or Territory, working in partnership with relevant disability research centres. **(Recommendation 7).**

## Strengthening Current Housing Responses

### Quality Tenancy Management

By requiring SDA providers to register the NDIA there is recognition that housing should be provided by reputable organisations. However, where this accommodation is rented there are currently no expectations of the tenancy management services. The community housing sector is regulated and thus has performance standards it is required to meet, but we believe there is further scope for demonstrating service excellence for people with disability.

The community housing industry is already working on additional more aspirational industry standards to set out how we deliver specialist services. The Department of Veterans’ Services have funded CHIA to develop a standard for veterans housing. Two philanthropic foundations are also supporting another standard in responding to victim / survivors of domestic and family violence. In both cases the standards are informed by people with lived experience.

There is potential for the NDIA and DSS to support the development of a similar industry standard for disability housing that:

1. defines minimum expectations through to what constitutes excellence
2. considers tenancy management responses that are standard for any household through to enhancements required for people with complex needs
3. also considers likely directions and support for tenancy management, assessment management and property standards
4. recognises the need to empower applicants and tenants **(Recommendation 8)**

### Housing Design

The paper also notes the need to consider alternative housing options and also to recognise design excellence. We would be keen to see a focus by the NDIA on innovative housing design and showcase innovative approaches already developed through the SDA funding model. 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. **(Recommendation 9)**

## Specialist Disability Accommodation

Since the SDA funding program was introduced around 3,200 of the projected 10,000 growth places have been constructed. In some instances, group homes of five residents, which the NDIA considers institutional have been built. The paper acknowledges the need to consider how the SDA funding methodology should be adjusted to enable contemporary housing at scale with reasonable cost and in a timely, reputable manner.

At the same time the paper also acknowledges large number of group homes still exist. The NDIA should be working with the States and Territories to support the redevelopment of their SDA assets where they are no longer fit for purpose. For example, the Hunter Residence Program in NSW<sup>8</sup>, saw the state government contracting with the community housing industry to provide new accommodation for people living in obsolete and inappropriate institutional settings. The renegotiation of the NHHA mentioned earlier provides an opportunity for a more strategic approach to be taken towards the renewal and replacement of aging group homes and other unsuitable disability housing, which are spread across Australia's cities and regions and provide opportunities for new disability housing supply reflecting contemporary models of living and support and participant preferences. Community housing providers can play a key role as development and management partners **(Recommendation 10)**

## References

<sup>1</sup> [Housing assistance in Australia, Data - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au)

<sup>2</sup> 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>.

<sup>3</sup> Pawson, H., Milligan, V. & Yates, J. (2020) *Housing Policy in Australia: A case for system reform*; Singapore: Palgrave Macmillan

<sup>4</sup> <https://www.infrastructureaustralia.gov.au/publications/2021-australian-infrastructure-plan>

<sup>5</sup> [Housing 2041 - NSW Housing Strategy](#)

<sup>6</sup> [Accessible Housing Register | Home Connections \(home-connections.co.uk\)](#)

<sup>7</sup> [Evaluation of the LAHR March 2011.pdf \(rbkc.gov.uk\)](#)

<sup>8</sup> [Hunter Residences Program NSW \(bluechp.com.au\)](#)