



# The Worsening Rental Crisis in Australia

Submission

Prepared on behalf of CHIA by

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## Introduction

**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 120,000 homes, housing people on low and moderate incomes who find it hard to access affordable and appropriate tenancies in the private market. This submission is also supported by the National Aboriginal and Torres Strait Islander Housing Association, NATSIHA and the following peak organisations which represent CHOs at the state level, CHIA NSW, CHIA QLD, CHIA SA, CHIA VIC, Shelter Tasmania and Shelter WA.**

Over 25 percent of all social housing in Australia is managed by CHOs. Many also manage affordable rental housing, where rents are charged at a discount to market rent and eligibility is determined by the program requirements or government policy. The largest CHOs manage between 5,000 and 11,000 properties each and 102 of the largest registered community housing organisations, manage an estimated 96% of all community housing managed homes, with an average portfolio size of over 2,000 properties. Around a third of homes are owned by CHOs and the remaining dwellings are managed on behalf of the state and territory housing authorities or private investors<sup>1</sup>. CHOs also manage short term accommodation such as crisis and transitional units. Some also have specialist disability accommodation.

CHOs are regulated by the National Regulatory System for Community Housing, the Registrar of Housing Agencies (Victoria), and the Community Housing Regulatory Framework (Western Australia) and manage tenancies in line with relevant State/ Territory tenancy legislation.

The Community Housing Industry Association (CHIA) welcomes the opportunity to respond to the Senate Standing Committees on Community Affairs Inquiry into the worsening rental crisis in Australia.

The worsening situation for private renters is a clear sign of a housing system that is failing Australians. Australia's housing problems are complex, multi-faceted and interdependent.<sup>2</sup> Unaffordable rents, shortages of private rental properties, escalating homelessness, mortgage stress, and shortages of social housing are all major problems. There are no easy solutions. Holistic structural change is required.

Research shows that five years ago, before the current crisis, more than three million Australians were living in poverty after taking their housing costs into account. Of those, 1.3 million were not in before-housing poverty but had been pushed into after-housing poverty by their housing costs.<sup>3</sup> Our response is therefore largely focused on this part of the housing system where affordability issues are most acute and supply is most severely constrained – low- and moderate-income households.

The following points summarise why CHIA has chosen to take this focus:

- As revealed in the latest official figures (2021) around 122,000 Australians are homeless on any given night. Almost a quarter are aged between 12 and 24 years. Homelessness amongst women is increasing accounting for 81.7% of the 6,067 increase of people experiencing homelessness in 2021.<sup>4</sup>
- in 2021, there was a shortfall of over 640,000 homes across Australia, affordable to low income households – 5% to 8% of all households in most parts of Australia. Accounting for projected household growth, there will be over 940,000 low income households with unmet housing needs in 2041.<sup>5</sup>
- At present, social and affordable rental housing together account for about 4.2% of Australia's housing. Three separate analyses undertaken in the last decade identify that addressing the housing needs of low and moderate income people who find it hard to access affordable and appropriate tenancies in the private market requires around 8-9% of Australia's total housing stock to be social housing, and around 3% to be affordable housing.<sup>6</sup>

While there are ways the current situation can be ameliorated in the short term, addressing Australia's current rental housing challenges demands coordinated action from the Federal and State/Territory governments. Like the post-war challenges that confronted Australian governments eighty years ago, our current situation calls for concerted and coordinated action, CHIA believes significant progress will not occur until there is commitment to two long term actions:

#### **a. Increasing the supply of social and affordable housing**

The independent review of the National Housing Finance and Investment Corporation (NHFIC) in its August 2021 report estimated that Australia required an additional 891,000 social and affordable rental homes over the next twenty years to address current shortfalls and keep pace with population growth. Addressing this shortfall requires (they estimated at the time) a capital investment of around \$290 billion.<sup>7</sup> While private investment will play a role, this will only be unlocked by government contributions in the form of grants, land and / or subsidies.<sup>8</sup>

The Federal government's proposed Housing Australia Future Fund, the Social Housing Accelerator affordable housing commitments in the National Housing Accord and social housing programs being delivered in some states and territories are a solid foundation on to which to build what needs to become an ongoing development program.

The cost to governments in supporting a development program will be offset by savings elsewhere. Recent analysis indicates that the current shortage of social and affordable rental homes is costing the Federal and State/Territory governments almost \$677 million per year in avoidable justice, health, and welfare costs. If nothing is done this annual cost is predicted to rise to \$1,290 million per year by 2036.<sup>9</sup>

## **b. A fit for purpose rental housing market**

To achieve a fit for purpose rental housing market nationwide requires national leadership and housing policies that consider the multiple and complex demand and supply factors that influence the rental market. Significant market transition is needed to get the Australian rental housing market operating well. CHIA recommends that broad based rental reform is a key area of focus for the forthcoming National Housing and Homelessness Plan. This includes focus on all rental housing (private, social and affordable) and also important issues that touch on all housing supply including rental housing, such as sustainability, resilience to natural disasters and climate change, connections with urban infrastructure programs and accessible housing supply.

The seemingly intractable nature of the housing challenges - of which rental stress is one symptom will require strong, coordinated and evidence- based policy responses. The new institutions that the housing legislation currently before the Senate will create, Housing Australia and the National Housing Supply and Affordability Council, are essential to the robust national response that has a significant expansion of social and affordable housing as its central pillar. CHIA believes it is time for the legislation to be passed.

We also need better planning systems for our cities and the roll out of annual state housing targets for social, affordable and at-market housing through the National Housing Accord. We know that the current legislation on its own will not fix the housing crisis. But it does create the institutions necessary to make a start. In combination with a strong long term and funded National Housing and Homelessness Plan that is underpinned by solid research there is an opportunity to make the systemic changes we need.

## **About our submission**

Research is a key part of CHIA's role. The basis of this submission is findings from research we have conducted or commissioned in recent years. In addition, we collected information from members about their current experience of and views about the private rental market through a survey and a consultation session. Thirty-six members responded to the survey, just under 25% of all members, a decent return rate given the very tight turnround.

CHIA's members have told us that they are experiencing immense difficulties supporting low income people to find rental accommodation. They have also told us that their own supplies of social and affordable housing are insufficient to meet the surging demand and it is increasingly difficult to assist tenants of time-limited housing programs find longer term rental housing. When they can source additional properties through the private rental market, the rents are high. Property owners are terminating leases to CHOs to achieve higher rents elsewhere. The dwindling housing supply is affecting their ability to assist low income renters.

As part of our consultation with members - we asked for examples of their current experiences with the private rental market, and also the experiences of low income renters turning to CHOs for help with finding housing. Some of the examples they supplied are included throughout our submission.

As CHIA has responded to only some of the inquiry's terms of reference and structured our submission to avoid duplication. We have indicated below how we have responded to the terms of reference.

- a. the experience of renters and people seeking rental housing – these are provided in text boxes throughout the submission
- b. rising rents and rental affordability – explained in the introduction and in section 1
- c. actions that can be taken by governments to reduce rents or limit rent rises; responded to in section 2
- d. improvements to renters' rights, including rent stabilisation, length of leases and no grounds evictions (section 3)
- e. factors impacting supply and demand of affordable rentals – subsumed in section 1
- f. international experience of policies that effectively support renters. – we have not responded
- g. the impact of government programs on the rental sector – this is subsumed across other sections (see additional social housing, inclusionary zoning and head leasing etc.



## Recommendations

We have focused on high level recommendations, recognizing that the Federal government is about to embark on a National Housing and Homelessness Plan (the Plan) and this provides an opportunity to reform the rental market in Australia. Our recommendations also focus on those that the Federal government could implement or facilitate.

We have not identified a list of particular tenancy reforms as these lie within the jurisdiction of the states and territories rather than the Federal government. However, in the text we have made suggestions for policies that could be examined during the review and we are a signatory to the joint statement attached as an appendix. It is worth noting that the overwhelming number of members responding to the survey supported removing no cause evictions from residential tenancy agreements.

1. The Plan should set out actions and targets and provide funding to address the current shortfall of social and affordable rental housing, and future needs, i.e. a projected 942,000 homes by 2041. The Plan should clearly articulate how the need of more disadvantaged groups including First Nations peoples and people with disability will be addressed.
2. The National Housing Accord should prioritise the development of a national inclusionary zoning framework that supports States, Territories and local governments to implement location specific schemes.
3. To inform the Plan the (interim) National Housing Supply and Affordability Council should investigate, consult and report on opportunities for improvements to renter's rights through a national framework which upholds the rights particularly of low income and marginalized renters and can inform considerations at State and Territory level.
4. The Plan should integrate actions from other National Strategies - for example on minimum property and energy performance standards – and set out how these will be progressed for rental accommodation.
5. The Commonwealth Rent Assistance program should be reviewed drawing on recent research and international examples of housing support payments and options for long term reform put forward. The aim should be that it lifts recipients out of housing stress and is available to all lower income households in rental stress. In the shorter term the payment adjustment system should reflect changes in real rental costs.

To assess the impact of actions to address rental stress also requires improvements to data including (1) establishing nationally consistent housing industry datasets to support informed planning for social and affordable rental housing supply as set out in previous of our submissions<sup>10</sup> and (2) more comprehensive data about rent increases in existing as well as advertised tenancies. In this respect the ABS should



regularly publish statistical analysis of the distribution and amount of rent increases during and at the commencement of tenancies, per the 2023 ABS-RBA analysis<sup>11</sup>.

## Response

### 1. Rising rents and rental affordability

The current situation of rising rents and declining rental affordability is having a devastating effect on low and moderate income households around the country.

As recognised by the Productivity Commission in 2019, the rising costs of home ownership, static supply of social housing and increased household mobility have meant that the private rental market is playing an increased role as a long term housing option for a broader range of the population, including low income households.<sup>12</sup> For example, in 1996, social housing accounted for about 6.5% of Australia's total housing supply. Today this figure is slightly over 4%.

*We have challenges delivering exit plans for tenants to transition from the temporary private sector leasing program. Often the market rents are too high for the tenant to take over the lease and the wait time for public housing in the Northern Territory is about 8 years.*

Tier 2 Community Housing Provider (NRSCH), Northern Territory

Even in conditions of relatively stable rental affordability, most lower income renters experience housing affordability stress i.e., have housing costs exceeding 30% of income. Furthermore, almost half of households in rental stress will remain stuck in the situation for at least five years, creating conditions of entrenched disadvantage with huge associated personal, community and economic costs.<sup>13</sup>

The results from our survey illustrate the current pressures faced by households approaching the community housing sector for assistance. 85% of those surveyed reported that they received noticeably more applications for advertised affordable housing vacancies, and the vast majority of these respondents also report that applications are coming from households with higher incomes than previously.

Rising rents are also having an impact on the community housing sector's ability to head lease homes from the private sector. Responses to our survey indicated that around 80% are finding it difficult to source homes to head lease and a similar number report an increase in private landlords leaving the schemes.

## 1.1 Shortage of properties affordable to low income people

The 2019 AHURI report ‘The supply of affordable private rental housing in Australian cities: short term and longer-term changes’, noted an increasing concentration of private rental supply at mid-market levels and estimated that in 2016 four out of five income private renters in the lowest income quintile (Q1) were paying unaffordable rents with the proportion rising to almost nine out of ten renters in metropolitan areas. In the report which is the latest of a time series that has been running every five years since 1996, the researchers also found that ‘there was an increasing trend in Q2 [second lowest income quintile] renters nationally paying unaffordable rents: this rose from 24% in 2006 to 36% in 2016’. In Sydney, 71% of Q2 renters were paying unaffordable rents in 2016. In all capital cities there is a ‘spatial restructuring of rental housing markets’ with more affordable homes in the outer suburbs and satellite cities.<sup>14</sup>

*Harold and Kylie, a couple with 3 young children, sought help from a CHO because they were living in a borrowed camper trailer. Kylie was 8 months pregnant. They had been living with extended family in rental property, but when the house was sold, they were unable to find another.*

Member supplied case study

Analysis of 2021 census data commissioned by CHIA identified the highest numbers of low households with unmet housing needs at the Gold Coast, Sydney, Melbourne, Logan, the Sunshine Coast and Ipswich. The highest proportion of unmet housing needs was in the Northern Territory – Outback where over a fifth of all households have unmet housing need.<sup>15</sup>

The COVID-19 pandemic laid bare the reality of a housing system that is not meeting the needs of

*Betty aged 57, and her daughter Kerry approached a CHO for help with payment of short-term motel accommodation and with finding housing. They became homeless when the lease on their current property was not renewed, and they were not able to find another property to rent. Betty spends most of her time into caring for Kerry, who has an intellectual disability.*

Member supplied case study

Australians in the bottom two income quintiles. In the early stages of the outbreak in 2020 States and Territories took rapid and effective action to address both rough sleeping and overcrowded shelters and boarding houses where residents share facilities. By the end of 2020 State governments had provided emergency accommodation to over 12,000 former rough sleepers. However, the larger challenge of finding people permanent homes has not been met. As well as re-housing those provided with temporary accommodation, there are many more households who were already in rental stress before the pandemic or who have become precariously housed as a result, either from losing employment or, being unable to meet rising rents in many parts of Australia. The continued intensification of housing needs due to Australia’s social and affordable rental housing deficit demands a response. Our survey of

members showed that nearly three quarters of respondent are also finding it more difficult to assist tenants in short term accommodation to move into suitable long term options.

Margaret and Edward have lived on the NSW Mid North Coast for all of their adult lives. In the 80s, the couple had been living in a modest and affordable rental unit in Port Macquarie for seven years. They were taken by surprise in March 2022 when their property was put up for sale. The couple were given 42 days' notice to vacate when the property sold and their lives started to unravel.

The couple found themselves in a desperate situation in the midst of an unprecedented housing crisis. Despite applying for over 20 properties in two weeks, they were unable to secure another rental property. They began to despair, and Edward told their neighbour they were considering ending their lives as they contemplated becoming homeless.

Thanks to the advocacy and support of their neighbour, the couple were referred to our CHO by their local Member of Parliament. With continued support from their neighbour, the couple registered on the Housing NSW Housing Register, making them eligible for social housing through our CHO. On 21 April 2022, the couple signed a lease and are now living in an affordable rental unit in an Over 55s apartment complex.

Member supplied case study

The 2022 Rental Affordability Index published by SGS Economics and Planning, National Shelter, Beyond Bank and Brotherhood of St. Laurence highlights the poor rental affordability nationwide for single people



on Jobseeker payments in particular.<sup>16</sup> Supporting this finding, the March 2023 *Rental Affordability Snapshot* identified four rentals in all of Australia affordable for a single person receiving Jobseeker. The same study found that one percent of rentals were affordable for couple on the Age Pension and housing affordability for a single person on the minimum wage working full time halved over the past twelve months to slightly under one percent of rental properties advertised.<sup>17</sup>

Exacerbating the shortage of homes is the loss of homes provided through the National Rental Affordability Scheme (NRAS). The scheme was introduced by the Federal Government in 2008 and approximately 36,000 homes were constructed. It provided an annual financial incentive to property owners who supplied new properties that were to be rented at below market rates to people on low to moderate incomes. The financial incentives were provided for ten years. Where CHOs own the homes the intention is to maintain these properties as affordable rental. However, CHOs own just 3,716 of the 24,386 homes where incentives will expire between 2023 and 2026.

*Across the 185 NRAS properties we own, we have experienced a significant increase in tenant mental distress. We are averaging 2 calls a week from tenants expressing thoughts of self-harm, experiencing mental distress and attempting self-harm. These tenants give increased rents and cost of living pressures as the reason. We have tenants in NRAS properties paying between 45% and 75% of their income in rent. Including some who are unemployed and have a Centrelink income only.*

Tier 1 Community Housing Provider (NRSCH), Northern Territory

*Our organisation provided 3,500 NRAS properties, some 10% of the national total. The abandonment of the scheme has led to significant negative outcomes for tenants, especially at a time of crisis in the rental sector and inadequate social housing supply.*

*Over 30% of tenants in NRAS properties are eligible for social housing and many others simply cannot meet the 25% rent increases that are common once the property leaves the scheme. We had sophisticated NRAS transition planning and engagement, but nothing can replace the need for actual available and affordable homes. Solutions don't come from thin air!*

*Our partnership with the Queensland Government has resulted in some of the most vulnerable tenants being assisted. The Federal government must take responsibility for addressing the immediate needs generated by its abandonment of NRAS and avoid displacing tenants, often into homelessness whilst it rolls out further new builds.*

Tier 1 Community Housing Provider (NRSCH), Queensland

## Cost to the community and the economy

Research by Nygaard and others identifies that shortages of social and affordable housing generate avoidable public sector costs in other areas and reduce personal and household physical and mental wellbeing. In 2022, the economic and social costs of the current shortfall in social and affordable housing were estimated at almost \$677 million nationwide, rising to approximately \$1,290 million by 2036 if nothing is done.<sup>18</sup> This work also identified the areas experiencing the greatest costs, which included regional areas such as the Richmond-Tweed area of northern NSW (before the 2022 floods), outback Northern Territory, the Sunshine and Gold Coast, in addition to large parts of Melbourne and Sydney.<sup>19</sup>

*Melissa aged 26, presented with her two children aged 4 and 7 years, asking for help after two months of lodging tenancy applications and inspecting properties. They were couch surfing with a friend but were only able to do this for a week and had spent the previous weekend sleeping in Melissa's vehicle. Melissa was concerned for the safety of her children and worried that she had not been able to work for the last few weeks.*

Member supplied case study

### 1.2 How much social and affordable housing is needed?

The evidence is that Australia needs around 8-9% of its total housing stock to be social housing for low income households and around another 3% to be affordable rental housing for moderate income households. This is about three times the current supply. Although social housing waiting lists are often used as a proxy for social housing demand, these exclude or discourage registration by many low-income households in housing need through increasingly strict eligibility criteria, temporary suspensions and the sheer length of wait times for anyone other than multiply disadvantaged households in extreme need. There are no wait lists for affordable housing.

*We recently applied for 65 rental properties to maintain our Community Housing Leasing Program quota – with not a single successful application. Coffs Harbour has a vacancy rate of less than 1%.*

Tier 1 Community Housing Provider (NRSCH), NSW

CHIA is aware of four robust attempts to estimate the need for social and affordable housing. First a 'top down', census-based approach to estimating social housing need was taken in the AHURI research 'Thirty years of public housing supply

and consumption: 1981–2011'. Using the now generally accepted 30% of income housing affordability benchmark, the authors estimated that to satisfy unmet need would require (at the time) an additional 630,000 social housing dwellings. This would take total social housing to 8.2% of Australia's overall housing stock. The authors noted that their method excluded homeless households and took no account of the appropriateness of accommodation occupied by existing households.<sup>20</sup>

In contrast, a ‘bottom up’ approach was taken in the AHURI Inquiry Social Housing as Infrastructure, as published in 2018. This examined need amongst households in income quintile 1. This work was the basis for the Filling the Gap report for CHIA NSW and Homelessness NSW which extended the analysis to households in income quintile 2. Aggregating up from needs estimates at Census Area SA4 scale, this method identified the national shortfall of homes affordable to Q1 and Q2 households in 2016 and – also factoring in newly arising need over coming years – calculates the additional number of households ‘falling into need’ by 2036 (assuming current levels of social housing provision). It estimated that around one million additional social and affordable homes will be required over the period 2016-2036. While the one million ‘social and affordable housing need’ figure seems high, the social housing element of it equates to 8-9% of Australia’s dwellings– i.e., the same as the first research quoted. One again there are some limitations to the analysis, including that it does not assess housing suitability (size, location, accessibility etc.).<sup>21</sup>

*There has been an increase in the number of people contacting us for housing. We have seen a 10 fold increase in the last year, and the variety of people contacting us has also expanded.*

Tier 2 Community Housing Provider (NRSCH), NSW

A third and more conceptually complex approach has been devised by SGS Economics and Planning and is set out in SGS Economics and Planning – Submission to Affordable Housing Working Group Issues Paper.<sup>22</sup> Very briefly, the approach involves establishing how many households fall into very low-, low- and moderate- income brackets. The analysis first involves establishing disposable incomes after income tax and housing costs by household type and then calculating how many households require below-market-cost housing within each category. To do this SGS examined the housing needs of six groups from those rough sleeping to households in rental stress.

SGS concluded that 656,429 households that needed affordable housing solutions in 2011. This represented 7.9 per cent of all households in Australia. Adding this to the number of existing households already accommodated in the 389,383 social housing dwellings in existence at that time would suggest Australia requires 12.5 per cent of its stock to be social and affordable housing. Given this includes affordable rental housing, the total is reasonably consistent with the other two estimates.

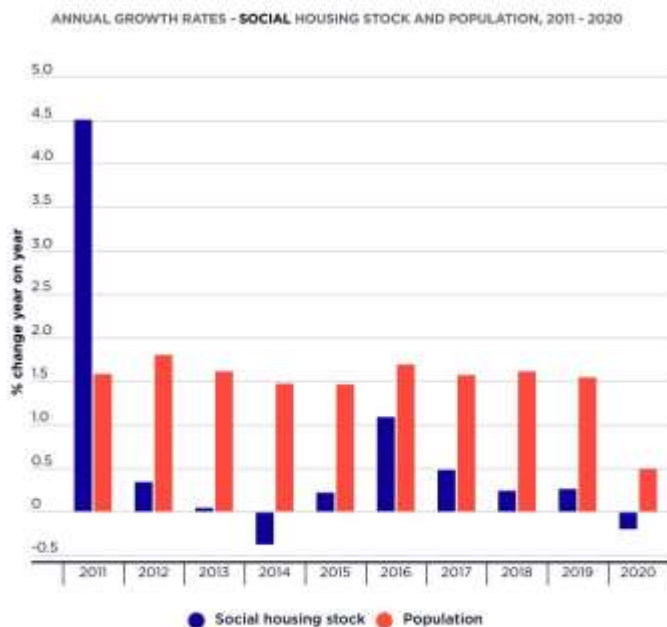
Lastly, a recent estimate of Australia’s social and affordable rental housing shortfall was made as part of the statutory review of NHFIC in 2021. This estimates that 614,000 social housing and 277,000 affordable rental housing homes – 891,000 homes in total - are required by 2040. A figure similar to the AHURI estimate.<sup>23</sup>

Therefore, Australia needs around 8-9% of its total housing stock to be social housing and around another 3% to be affordable rental housing. By way of comparison, England has circa 17% social housing, whilst the OECD norm is around 7%.

## 2. Actions that can be taken by governments

While there are short term ameliorating actions that can be considered, in the long term solutions require better alignment between demand for rental housing and its supply. Supplying more social and affordable housing is the most practical, long term solution for low and moderate income households experiencing housing stress. It is time for governments to the heavy lifting that will create a fit for purpose rental housing market for the future.

### 2.1 The National Housing and Homelessness Plan



NOTES: Dwelling stock figures relate to 30 June each year, population numbers relate to 31 December each year. Allowance made for missing SDPH statistics for Northern Territory for the years to 2018.

Source: Steering Committee for the Review of Government Service Provision (2021); ABS (2021) National, state and territory population <https://www.abs.gov.au/statistics/people/population/national-state-and-territory-population/latest-release#data-download>

Figure 1: Annual growth rates - social housing stock and population, 2011-2022

Rental housing is just one part of a broader housing sector. CHIA's position is that long term fixes are needed, and these must be guided by a National Housing and Homelessness Plan that focuses on ensuring all Australians can access housing that is affordable, and guides private rental, social and affordable housing supply within this context. A national approach to housing supply is essential. While Australian governments at different levels do make informed plans for housing, these plans usually address social and affordable rental housing in isolation from market housing supply. They also tend to plan for social housing supply based on the location of current provision rather than assessing objective, future need.

## Housing First Nations people

The national figures cited by CHIA in this submission mask the disproportionate impact of rental property shortages and unaffordable rents on First Nations people. In July 2021, the Productivity Commission reported that only 78.9% of the First Nations population was living in appropriately sized, not overcrowded homes compared to 92.9% of the general population.<sup>24</sup> Significant effort is still required to reach the target of 88% by 2031 set in the National Agreement on Closing the Gap.

## Housing people with a disability

Significant effort is also needed to meet the needs of the large proportion of NDIS participants who require access to affordable and accessible rental options. In 2022, 29% of people with a disability, and 39% of those under 65 years of age, were renting. Additionally, people with a disability are less likely than other Australians to access home ownership.<sup>25</sup> Compared with the general population, around four times as many renters with a disability rent from a social housing provider.

There is a key role for the proposed National Housing and Homelessness Plan in addressing the supply of rental housing affordable for and accessible to people with a disability.

*One of our private landlords recently explained that their borrowing capacity (LVR) has decreased as their bank considers the asset to have a lower yielding return potential as it is rented to people with disability. This is despite us paying market rent.*

*The landlord has applied two increases in rent from \$3,120 per calendar month in June 2022 to \$4,000 per calendar month in June 2023. Close to a 29% increase.*

*Tier 2 Community Housing Provider (NRSCH)*

From CHIA's perspective, an immediate step towards an effective National Housing and Homelessness Plan could be a housing needs survey to inform immediate decisions about the locations where private rental, social and affordable rental housing is needed to address current shortages. In the longer term, CHIA is calling for a detailed multi-year strategy with clear targets for overall supply, and for homes that are affordable to households in all income quintiles.

## Scope of the National Housing and Homelessness Plan

CHIA's view is that the National Housing and Homelessness Plan should contain separate but fully integrated plans to tackle homelessness, address rental housing supply in rural and regional areas as well as the capital cities, and address the housing needs of people who experience very high barriers to accessing the private rental market such as Indigenous households and for people with disability. CHIA also sees the National Housing and Homelessness Plan as an opportunity to address important issues that touch on all housing supply but which are often ignored in the context of rental housing. These include sustainability, resilience to natural disasters and climate change, and connection with large scale



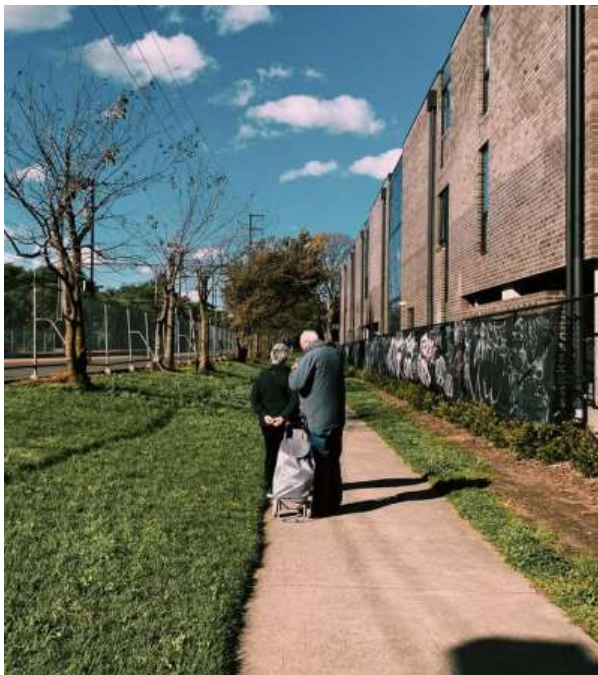
urban infrastructure programs. Recent AHURI research draws together useful international examples and presents options for how a National Housing and Homelessness Plan might be implemented in Australia.<sup>26</sup> One of the most relevant international examples is Canada, which like Australia has a relatively small social housing sector, a division in extreme unaffordability and a similar population. Canada’s 2017 ten-year National Housing Strategy increased Federal investment in subsidised housing through a combination of initiatives including a stimulus program – the rapid housing initiative, low-cost loans, rental subsidies, substantial funds to ‘transform’ the community housing sector, as well as on going grant.<sup>27</sup> Canada’s national housing agency, responsibility for subsidised housing between Federal and Provincial governments, cities with the Canada Mortgage and Housing Corporation is responsible for delivery of the strategy.

## 2.2 Supplying more social and affordable rental properties

At present, new social and affordable rental housing construction is barely keeping pace with sales and demolitions. As Figure 1 sourced from UNSW City Futures Research Centre indicates, 2019/20 was the second time in six years when there was an absolute reduction in social housing.<sup>28</sup>

CHIA believes a primary objective must be to improve the supply of dedicated social and affordable rental housing properties. Doing this is an essential step towards securing Australia’s capacity for economic growth, productivity, and community wellbeing. Not only will it address entrenched disadvantage associated with private rental housing stress, it will dampen demand for government funded services such as social security and health systems and supports economic growth and community wellbeing.

Housing outcomes are a shared Federal and State/Territory responsibility. Expanding social and



affordable rental housing provision depends on the active participation of both levels of government. The Federal government has the tax-raising and borrowing powers of the scale required to underpin the investment that is needed and unlock contributions from the private and charitable sectors and can supplement housing programs funded by the State/Territory governments. The proposed Housing Australia Future Fund (HAFF) is one example of the form such potential investment could take.

Over the last couple of years, several States have announced substantial (if short term) social and affordable rental housing investment programs, notably Victoria but also Queensland, Western Australia and Tasmania. Even in Victoria, the Big

Housing Build anticipates increasing social housing supply by only just enough to maintain social housing as a proportion of all housing over the program’s 4-year time horizon.

In its 2021 report *COVID-19: Rental housing and homelessness impacts in Australia* the City Futures Research Centre drawing on unpublished data, estimates the additional units (after accounting for demolition and sales) that will be added to the current social and affordable rental housing numbers is around 5,500 per year to 2024.<sup>29</sup> This total is considerably reduced if the affordable rental housing lost when National Rental Affordability Scheme incentives expire is factored in.

### 2.3 Reform Commonwealth Rent Assistance

Commonwealth Rent Assistance (CRA) is a payment towards rental costs available to people who receive a Centrelink pension or benefit. CRA has been provided in various forms since 1958 and has been a significant rental subsidy program since the 1990s. CHIA acknowledges the 15% increase in the maximum CRA payment announced in the May 2023-24 Budget which will provide financial relief to many households.

In CHIA’s view, the CRA program remains in urgent need of reform, despite the recent increase in maximum payment. The program is disconnected from the realities of the rental market. For example:

- The maximum payment is the same Australia-wide, regardless of actual rental costs in different locations. In locations where housing is more expensive, such as Sydney or Melbourne, households are still in housing stress after receiving CRA.
- Payment amounts are indexed in line with the consumer price index, rather than changes in rents.
- The subsidy is not available to low income households who do not receive a Centrelink pension or benefit.
- There are no minimum condition or amenity standards attached to the property rented by the person receiving CRA. There is potential for the subsidy to trap renters in sub-standard properties that would be unviable on the open market.

*The median rent for a unit is \$440 a week, whereas the weekly JobSeeker payment from Centrelink is \$346 per week. The crisis in Coffs Harbour is exacerbated by the impacts of the Coffs ByPass Pacific Highway Upgrade project - construction companies are renting available units and motels to house their workers - and the ongoing impact of the Lismore floods.*

**Tier 1 Community Housing Provider  
(NRSCH), NSW**

CHIA recommends the scope of the National Housing and Homelessness Plan include reform of the CRA program to address these deficiencies and ameliorate the difficulties experienced by low income renters.

## 2.4 Headleasing programs

**Headleasing** is where a private rental property is rented from the owner by a community housing organisation (CHO) and then on-let to a low income tenant. Headlease properties meet the same condition and amenity standards as other social and affordable housing and the CHO takes responsibility for ensuring the property is maintained to social and affordable housing standards as well as paying the rent to the property owner.

The tenant pays an agreed rent to the CHO, usually similar to a social housing rent. The gap between the rent paid to the property owner and the rent paid by the tenant is funded from an external source such as a government funding program.

Headleasing programs are used by State and Territory governments across Australia to support access to private rental properties at rents affordable to low income households. Examples are the My Place program (NT), the Helping Hand Headlease scheme (Qld), the Private Rental Incentives Program (Tas), the Transitional Housing Scheme (Vic), and the Community Housing Leasing Program (NSW).

Headleasing can offer an immediate and flexible response. For example, the NSW Together Home program rapidly implemented a headleasing response providing medium term housing and wrap-around support for homeless people during the COVID-19 pandemic.<sup>30</sup> However caution needs to be exercised in its expansion as it can have perverse consequences on the rental market. Headleasing responses are not useful in locations where there is an absolute shortage of private rental supply. Nor is

headleasing effective in markets where the available properties available do not address the needs of low or moderate income households. In some markets, headleasing programs may also create competition between low income households and CHOs to rent the properties available. Lastly as noted earlier, in a market where vacancies are low and rents are rising, schemes which worked in the past may become more difficult to sustain.

Despite these limitations, CHIA supports the strategic use of headleasing programs as a short term action to supply rental housing at lower rents in areas of sufficient market rental supply.

*Our Community Housing Leasehold Program is running at a deficit because the average weekly rent for our current rentals has increased by \$53 per week. We have had to seek additional funds from government.*

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A growing number of our members operate social enterprise or not for profit real estate agencies which have proven to be effective in unlocking privately owned rental housing supply where owners are interested in creating social outcomes, as well as achieving a commercial return. CHIA believes these agencies, and CHOs generally, are well placed to support an expansion of headleasing programs in rental markets where these would be beneficial. However, it is critical that existing and expanded headleasing programs are adequately funded by governments in response to rapidly increasing market rents. This

ensures that CHOs can source and retain headleased properties for people in greatest need, without incurring significant financial losses to deliver the program.

## 2.5 Use the planning system to incentivize more affordable rental housing

Through regulation, the planning system can play a positive role in contributing more social and affordable rental housing without adding costs to the development industry or affecting overall housing supply.

CHIA supports providing a financial incentive for States and Territories to implement mandatory inclusionary zoning schemes. This could be through an approach such as co-funding design of a common base model which can be tailored for the conditions in different jurisdictions, co-funding policy design work or offering matching funding for affordable housing development contributions generated in the early years of a scheme's operation.

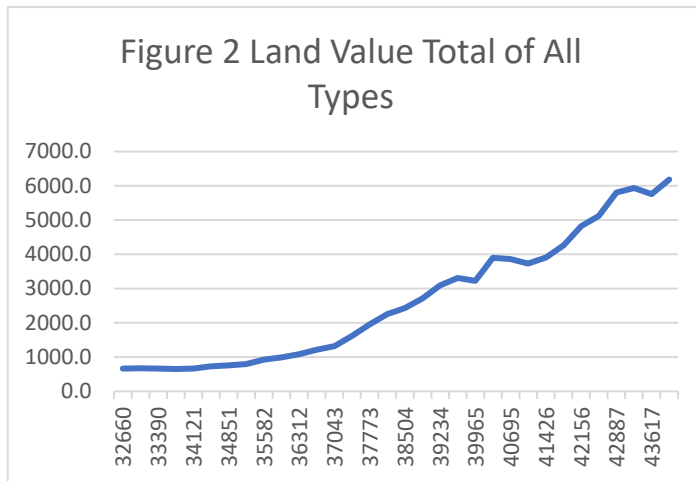
Mandatory Inclusionary Zoning (MIZ) or equivalent mandated schemes have operated successfully in many different jurisdictions throughout Europe and the United States. One example is England, where local authorities have had powers to mandate affordable housing for years. In 2019/20 20,000 social and affordable homes were generated solely through inclusionary zoning obligations and without any other grant funding. 3,812 of these homes were social housing.

While attempts have been made to introduce MIZ in Australia, there are very few examples of schemes generating social and affordable rental housing at any scale. The best known and most successful scheme is that operating in the City of Sydney where around 900 homes have been generated since the mid-1990s.<sup>31</sup>

To help overcome the barriers to MIZ, CHIA participated in the Constellation Project with other key industry and government players to develop a MIZ National Framework that minimizes the impacts on market development while still generating appreciable social and affordable rental housing supply. The framework provides a set of key principles that could be adopted in any jurisdictional scheme while allowing a degree of customization to suit local circumstances.<sup>32</sup>

The aim is for the framework to give clarity, consistency and thus certainty to developers – a key industry concern about development contributions voiced most recently in NHFIC's paper on how to pay for infrastructure.<sup>33</sup> The proposal is consistent with the recommendation 31 in the 2021 report from the Inquiry into Homelessness in Australia i.e., *'that the Australian Government, in consultation with State, Territory and local governments, seek to increase affordable housing supply when land is rezoned for residential development, through the introduction and harmonisation of inclusionary planning approaches across Australia'*.<sup>34</sup>

Development contributions are sometimes – incorrectly – described as a tax on housing. In the national framework proposal, a fixed percentage of all housing floorspace (or commensurate land / cash) developed on privately owned land in metro / high demand locations is to be designated, in perpetuity, as social and affordable rental housing, under CHO ownership and / or management. Rather than adding to construction costs, the requirement is to be factored into the price offered by the developer for the land.



Developers who have land-banked for possible future schemes without regard for the possible introduction of a MIZ scheme (in terms of land price paid) have an opportunity to develop such sites without any new obligation during the notice and transition periods we have proposed. MIZ is applicable to locations where land values have appreciated substantially – see Figure 2 – which can accommodate a social / affordable housing contribution while retaining a significant positive value

Source: ABS Table 61. Value of Land, by Land Use by State/Territory – as at 30 June, Current prices

### 3. Improvements to renters' rights

CHIA's members operate in a regulated environment where community housing industry regulation and government funding requirements prescribe a range of renters' rights beyond State/Territory tenancy legislation. These include rent setting, security of assistance and minimum property condition standards.

CHIA is conscious that renters' rights are regulated by State and Territory governments. While the principles behind improvements to renters' rights can be supported, the details of how a proposed change would be implemented are a critical part of the discussion. Tenancy law is an area where 'the devil is in the detail', particularly when it comes to examining the consequences of a change in tenancy law for the lowest income renters, government social or affordable housing program requirements, and industry regulatory arrangements.

CHIA sees benefits in exploring the opportunities for improvements to renters' rights through a national framework which upholds the rights of low income and marginalised renters and can inform considerations and consultation at State and Territory level. We are also supportive of the four principles set out in the joint statement attached to this submission.

In the following section we briefly comment on some of the considerations relating to no grounds eviction, length of leases and rent stabilisation from the community housing industry's perspective.

### 3.1 No grounds eviction

CHIA's members have a common purpose of providing rental housing for low and moderate income households. CHOs aim to create tenancies that are sustainable either long term or for the period of assistance eligibility. Tenancies are rarely ended without grounds.

CHIA's members also have firsthand experience of the challenges encountered by low income and marginalised private renters. If no grounds eviction is ended, care needs to be taken to ensure the remaining grounds for eviction are robust, so that grounds cannot be easily 'manufactured' with the aim of threatening the tenant's security of tenure.

It should also be noted that CHOs sometimes end tenancies for reasons that are not applicable to the private rental market. For example, when a tenant is no longer eligible for assistance, when the maximum period of assistance available under a program is reached, or when a specific property is no longer available for renting and the assistance is to be continued in another property instead. In any initiative to end no grounds eviction, care needs to be taken to address the legitimate reasons a social or affordable housing tenancy may need to be ended by a CHO.

Our survey found almost 100% of respondents supported the removal of no grounds evictions from residential tenancy agreements, where steps are taken to address legitimate causes as outlined above.

### 3.2 Length of lease

In the private rental market, short fixed term agreements can perpetuate housing instability by making it difficult for a tenant to predict how long the tenancy will last once the fixed term has expired. CHIA recognises that there are compelling arguments in support of offering longer fixed term agreements in the private rental market.

We note, however, that in contrast to private sector practices, CHOs often offer social housing tenancies under a continuous rolling agreement with no fixed term, reflecting that the assistance is available indefinitely provided the tenant does not seriously breach the tenancy agreement. In the community housing context, a fixed term agreement signals an intent to provide time limited assistance in line with, for example, a specific assistance program that offers time limited assistance with housing.

### 3.3 Rent stabilisation

Community housing rents are already stabilised to provide rent affordability and are set below market rent with very few exceptions. CHIA recognises that there may be a need for mechanisms that stabilise private sector rents as well.

CHIA notes that rent stabilisation is a potentially complex area. Internationally, measures have been applied at the start of tenancies as well as during the tenancy.<sup>35</sup>

CHIA's members are in the business of providing rental housing for the long term and as such are aware of the real costs associated with providing and maintaining rental properties over time. Cutting costs over time puts the condition of the property at risk. Additionally, if implemented poorly, there is a risk property owners may respond to stabilisation

measures by deciding to transfer their property to a more lucrative or less regulated market such as the short term stay market. Such a result will only exacerbate the current shortages of private rental properties. Furthermore, the feasibility of projects which combine social, affordable and market rental (with market rents in part subsidizing the below market examples) may be adversely affected if measures are not carefully designed.

In our survey over two thirds of respondents were supportive of 'carefully designed measures to moderate rents'. Of the rest there was little opposition but a concern that the design process would not be sufficiently robust and thus have perverse outcomes. CHIA asks that any recommendations relating to rent stabilisation are evidence based and take a nuanced approach that balances the real, long term, costs of providing and maintaining the property as well as the need to protect tenants from short term rent shock and sustain the supply of private rental properties.

### 3.4 Property Standards

CHIA's position is that all rental homes should be safe, accessible and healthy and meet a clear basic minimum standard. Any basic minimum standard applying to the rental market should include basic energy efficiency standards to reduce the energy required to heat or cool a home and ensure access to an affordable energy supply.

Earlier in the year, CHIA had input to, and fully supports, the ACOSS submission on the proposed National Energy Performance Strategy. This submission recognises that 'residential buildings hold the key to the transformation to a zero-emissions energy system' and that 'improving the energy performance of

*The subsidy from the Northern Territory government for the headlease My Place program is not keeping pace with market rents in and around Mparntwe/Alice Springs. The gap is widening and is putting stress on our ability to secure private rentals for the right price.*

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(NRSCH), Northern Territory

buildings is ...where significant gains can be made to improve the health and wellbeing of people and reduce poverty and inequality’.

The forthcoming National Energy Performance Strategy should clearly articulate a plan to upgrade existing social and affordable housing and also a strategy to ensure private rental homes are also improved.

At present, there are no effective financial incentives in place to encourage housing providers, including CHOs to improve the energy performance of their properties. CHIA believes this is a situation that must be rectified with urgency. Improving the energy performance of rental properties has the capacity to make a significant difference to the quality of life of tenants through lower energy bills and a healthier home.

CHIA has contributed to the ACROSS led National Low Income Energy Productivity Program (NLEPP) which, once funded, anticipates spending \$5,000 per home to upgrade the energy efficiency of private rental properties built before 5star ratings were introduced and also 100,205 community housing and Indigenous community housing homes nationally.

Additionally, the community housing industry launched its own environmental, social and governance (ESG) standard in March 2023 which includes metrics for (1) the number and % of homes which have been assessed against an energy ratings scheme and, of those assessed, the proportion in each rating) and (2) scope 1, 2 and eventually scope 3 emissions from community housing organisations (CHOs).

The missing ingredient is financial incentives to assist CHOs and other housing providers to improve the energy performance of the rental properties they own or manage.

CHIA believes this is an area that should be covered in the National Housing and Homelessness Plan, so that there is a systematic approach to reform of property conditions in the rental sector.

### 3.5 Property provider registration

While details of CHOs, including the size of their property portfolios, are publicly available on regulatory registers, there is no similar requirement for other rental property owners to disclose themselves or provide information about their rental property portfolio publicly. This lack of transparency makes it difficult for prospective private renters to identify if they are dealing with a legitimate property provider and access basic information such as the size of the property owner’s rental portfolio, and compliance with any applicable minimum property standards.

A property provider registration model like the scheme in place in Scotland could be an effective support for renters. Under the Scottish scheme, all residential property providers are required to register, and in doing so must demonstrate they are a fit and proper person and that their properties meet any required



standards. Property managers appointed to manage the property must also be identified. The register is publicly accessible, enabling prospective tenants to search it and confirm they are dealing with a registered property provider.<sup>36</sup>

In the Australian context, such an approach could build on existing State/Territory registers including registers of CHOs, potentially providing national coverage. CHIA recognises that there are a range of factors that need to be balanced to develop a streamlined and effective system of registration. We propose this idea is further explored as part of the development of the National Housing and Homelessness Plan.



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