

Redfern Legal Centre



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Please find attached our submission in response to the New South Wales Government's discussion paper on Social Housing in NSW.

We would welcome the opportunity to meet with you to further discuss our submission.

Yours faithfully,
REDFERN LEGAL CENTRE

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Submission to the Department of Family and Community Services Discussion Paper on Social Housing in NSW

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Introduction: Redfern Legal Centre

Redfern Legal Centre (RLC) is an independent, non-profit, community-based legal organisation with a prominent profile in the Redfern area.

RLC has a particular focus on human rights and social justice. Our specialist areas of work are domestic violence, tenancy, credit and debt, employment, discrimination, care and protection and complaints about police and other government agencies. By working collaboratively with key partners, RLC specialist lawyers and advocates provide free legal advice, conduct case work, deliver community legal education and write publications and submissions. RLC works towards reforming our legal system for the benefit of the community.

RLC's work in Tenancy

Since RLC was founded in 1976, tenancy has been one of our core areas of advice and advocacy. For 20 years RLC has been funded by NSW Fair Trading to run the Inner Sydney Tenants' Advice and Advocacy Service (ISTAAS). ISTAAS assists tenants living in City of Sydney, Leichhardt and Botany local government areas through advice, advocacy and representation. In May 2014, with funding from City of Sydney, RLC established the Millers Point Tenants' Service to assist the tenants of Millers Point, Dawes Point and the Rocks who are being relocated from their homes.

ISTAAS' work focuses on assisting public housing tenants and has a strong emphasis on homelessness prevention. Inner Sydney has a significant number of people living in public housing and there are now over 9,400 public housing dwellings in this area. Our submission is informed by the experiences of our clients, the majority of whom are public housing tenants and applicants.

RLC's expertise in providing support to social housing tenants

In addition to our specific service for tenants, RLC also auspices the Sydney Women's Domestic Violence Court Advocacy Service (Sydney WDV CAS). RLC's WDV CAS was chosen in 2014 to coordinate one of two launch sites for the FACS Domestic and Family Violence Reforms and we have since successfully implemented the Local Coordination Point and Safety Action Meetings at Waverley. We have recently received funding from FACS to provide early intervention support in care & protection matters in partnership with Legal Aid NSW (as part of the Safe Home for Life Reforms).

RLC is also involved in providing wrap-around services to vulnerable people. We are working in partnership with FACS to provide legal services within a multi agency wrap-around service at the Walker Street high-rise public housing buildings in Redfern. We are also working to set up a local medical legal service for Aboriginal people.

While RLC's solicitors specialise in key areas of law we work together to provide a holistic service for our clients. This and our collaborative work with other organisations and government departments in providing wrap-around support services makes us well placed to provide input into the future directions of NSW's social housing system.

RLC's view in summary

RLC welcomes the opportunity to contribute to the Social Housing in NSW Discussion Paper (the Discussion Paper).

We assist and advise many clients who have problems accessing the public housing system, getting the assistance they need to maintain their tenancies and transferring to suitable accommodation when their current accommodation places them at risk or does not meet their medical needs. We have assisted a large number of tenants to assert their right to repairs in social housing properties and to appeal decisions about their eligibility and urgency of their housing need – issues that recur frequently in a system that does not have the resources to maintain properties and meet growing housing demand.

We believe that a fair and sustainable social housing system is one that supports low-income and disadvantaged tenants and one that has the capacity to support the growing demand for affordable, appropriate housing in NSW. A sustainable housing system prioritises security of tenure, recognises the importance of support from housing providers to maintain tenancies and provides decision makers discretion to look at an individual's circumstances in any decision.

Our view is that the retention of public housing in our area and around the state is vital if the social housing system is to continue to assist those experiencing disadvantage to meet their housing needs.

Our submission addresses the questions posed in the Discussion Paper and our views about each question are summarised throughout the paper.

In 2014 RLC also contributed submissions to the Select Committee on Public, Social and Affordable Housing¹ and to the Public Accounts Committee into Tenancy Management² and our submission on this Discussion Paper should be read in light of those contributions.

'A response to the 2015 Social Housing Discussion Paper from social housing tenants living in Inner Sydney': Video Project

Accompanying our written response to the Discussion Paper is a video of the stories of social housing tenants and their perspectives on the issues raised in the Paper.

The video was produced in conjunction with Marrickville Legal Centre and can be accessed at: <https://www.youtube.com/watch?v=YkhcEP-gl3I>.

Quotes from the video interviews appear throughout our submission.

¹ <http://rlc.org.au/publication/submission-submission-select-committee-social-public-and-affordable-housing>

² <http://rlc.org.au/publication/submission-tenancy-management-social-housing>

³ Auditor General, 'Making the Best Use of Public Housing' Performance Audit, Audit Office of NSW, 2013;

² <http://rlc.org.au/publication/submission-tenancy-management-social-housing>

Pillar 1: A social housing system that provides opportunity and pathways for client independence

Given tenants living in social housing often experience disadvantage which is disproportionate to other areas of the community, what measures are required to provide tenants of social housing with pathways to opportunity and independence?

Pillar 1: Our view in summary

1. Security of tenure in public housing should be maintained.
2. The social housing system must continue to accommodate tenants who experience barriers to entering the private rental market, whether those barriers are short or long term.
3. Measures to support tenants with mental illnesses are essential to providing pathways to opportunity and independence.
4. The public housing rent model should not create disincentives for tenants to earn more income.

Security of tenure in public housing should be maintained

Public housing is designed to house people who are most in need; an aim that is set out in the *Housing Act 2001* and reflected in the criteria for eligibility for general social housing and priority housing. We agree with the Discussion Paper's evaluation that "stable housing is not just a foundation for education and work, but also an important foundation for recovery from health issues, mental illness, and trauma and for stabilising families where children are at risk of removal".

It is important to recognise that public housing provides households with vital security of tenure. Security of tenure provides tenants with greater stability, allowing them to build and rely upon established support networks (for example, neighbours and service providers) and to have consistent access to support services.

Security of tenure also facilitates community building. A consistent theme across our video response is the help and support that neighbours provide each other, delivering socially positive outcomes and potentially reducing reliance on external support services.

"I've been to my ophthalmologist and my general practitioner for a quarter of a century. I am not about to change at 88. There is a community and people I know, and help me and I can help them."
- Myra Demetriou

The private rental market in NSW is characterised by a lack of security of tenure. Private tenants in RLC's catchment area are typically offered 12-month leases and are susceptible to

evictions ‘without grounds’ once their leases end. Affordability is not the only barrier to the private rental market for social housing tenants and applicants – the lack of security of tenure, and the constant upheaval that this can cause, is a further barrier.

Reducing security of tenure or limiting the amount of assistance a tenant can receive will not help the social housing system to reduce disadvantage or promote independence for tenants. Since the lease review system was introduced in 2006, a very small proportion of tenants have been found ineligible to remain in public housing.³ The vast majority of households remain eligible and in need of ongoing housing assistance.

If public housing assistance is to be limited, the social housing system needs to be able to manage tenants leaving and re-entering the system as their circumstances change. With a waiting list of over 59,000 households and over 10 year waiting periods for housing assistance in many areas across the state, the current system does not have the level of flexibility needed to support such a change, without significantly disadvantaging tenants and applicants.

The social housing system must continue to accommodate tenants with barriers to entering the private rental market, whether those barriers are short or long term

As the Discussion Paper recognises, private rental housing in NSW has become increasingly unaffordable and beyond the reach of many low-income households across the state. This is particularly so in the Inner Sydney area, where RLC operates.

“It [public housing] helped me in a time when I lost my partner and fell into depression and couldn’t work anymore, cause I just couldn’t function. So I was placed in public housing... it put me on the road to recovery.”

- Pindi Rochelle Stevens

It is not appropriate for all public housing to be ‘safety net’ housing – the social housing system needs to be able provide for tenants who have short, medium and long-term housing needs. It should not be seen as a failing of the social housing system that it houses people over the long-term, and it should not be an expectation on every tenant that they re-enter the private market. Tenants whose incomes are unlikely to significantly increase, such as the large proportion of public housing tenants who rely on the aged pension, should not be subjected to persistent reviews of eligibility, tightening criteria or the risk of losing their tenancies.

RLC supports additional funding for programs that help tenants to rent privately and suggests that changes to rental laws could make renting privately more accessible for a wider group of people. Public housing cannot be seen in isolation from other types of housing. RLC supports models to improve housing affordability as put forward by the

³ Auditor General, ‘Making the Best Use of Public Housing’ Performance Audit, Audit Office of NSW, 2013; Tenancy Reviews Don’t Cut Waiting List, The Age, <http://www.theage.com.au/victoria/tenancy-reviews-dont-cut-waiting-list-20130506-2j3gk.html>

Tenants' Union of NSW (for example in the recommendations on page 16 of the Submission to the NSW Legislative Council Select Committee on Social, Public and Affordable Housing).⁴

"If I could get private housing, if I had the means, I would do. It's the costs, the rental costs, I can't even afford to go halfway in the rental market the way it is."
– Darryl James Paine

Measures to support tenants with mental illness are essential to providing pathways to opportunity and independence

The Discussion Paper notes that the number of people in public housing with mental illnesses is high, and increasing. In our submission to the Select Committee Inquiry of Public, Social and Affordable Housing,⁵ we wrote about ways in which the public housing system could better support tenants with mental illnesses in attaining and maintaining tenancies.

While there are programs designed to help tenants with mental illnesses attain and retain tenancies, including the *Housing and Mental Health Agreement (HMHA)*, greater resourcing and better protections are needed to ensure that tenants receive the support they need throughout their tenancies. RLC supports the expansion of the Housing and Accommodation Support Initiative (HASI) between NSW Health, FACS and the NGO sector, a program that assists the social housing system to support tenants with mental illnesses.

RLC assists a large number of tenants who face termination for actions that are associated with a mental illness. In many cases, consistent support and access to services throughout the tenancy could have prevented termination. The decision to terminate the tenancy of a tenant with a mental illness does not help to relieve the pressure on the housing system. To best support tenants with mental illnesses and provide opportunities for independence, the social housing system should work towards stronger partnerships with non-government organisations, more flexibility in policy operation, and more focus on assisting tenants to sustain their tenancies.

The public housing rent model should not create disincentives for tenants to earn more income

We agree that the provision of housing assistance has the potential to provide a secure foundation for people to pursue education and employment. Existing rent assessment rules, especially for tenants with income levels that require them to pay more than 25% of their rent, or for tenants with income that varies week-to-week, can create disincentives for tenants to start paid work, or to increase their current earnings. In this respect, we agree with the submissions made by the Tenants' Union of NSW to the Discussion Paper and its analysis concerning work disincentives under existing rent models.

⁴ <http://www.parliament.nsw.gov.au/Prod/Parliament/committee.nsf/0/362BFC5049E655BFCA257C92001908D>

³

⁵ <http://rlc.org.au/publication/submission-submission-select-committee-social-public-and-affordable-housing>

Case Study: Rent models

Ridah (not her real name) is single mother living in public housing who, after many years out of the workforce, started a casual job in a local RSL club. Ridah's working hours varied significantly: some weeks she worked almost every day and other weeks she didn't work at all.

Ridah had to report her income to both Centrelink and Housing NSW which saw her Centrelink payments reduced and her rent go up. Because the income reporting requirements for each agency were for different periods, the income Ridah reported to Centrelink didn't always align with the Housing NSW figures.

After 6 months, Housing NSW initiated a complete review of Ridah's rent and required her to collect all of her payslips again and to get her employer to make a declaration about her earnings. Over the course of this review, Ridah had to get her employer to sign four further declaration forms. At one stage of the review she accrued rent arrears of over \$1000 because of a Housing NSW miscalculation. The final outcome of the review did not see a significant change to Ridah's rent.

The income reporting and review process caused Ridah significant stress and at times she considered quitting her new job just to make things simpler. She complained that she did not make much extra money than when she was receiving Centrelink alone. The only reason she kept working, she said, was because she enjoyed her job.

Pillar 2: A Social housing system that is fair

The social housing system is often difficult to access for those most in need. What measures are required to create a system that is fair for those already in social housing, those on the waiting list and others who may need assistance?

Pillar 2: Our view in summary

1. A fair social housing system has a rigorous system for reviewing decisions.
2. A fair social housing system gives discretion to decision makers about terminating a tenancy.
3. A 'three strikes' policy in NSW would not create a fairer social housing system.
4. A fair social housing system allocates properties in the most equitable way possible.
5. A fair social housing system bases rent on affordability, not on desirability.

A fair social housing system has a rigorous system for reviewing decisions

In order to be fair to tenants and applicants, the social housing system must have a clear, rigorous system of review of decisions to ensure transparency, fairness and equity. RLC is concerned that the current mechanisms for appealing a HNSW decision are inadequate and provide insufficient protections for tenants in social housing.

Decisions made against tenants can have serious consequences – from non-eligibility, to large debts and even to termination. The Discussion Paper notes that only 40% of reports against tenants for non-disclosure in the current amnesty were substantiated. An allegation of non-disclosure can often result in an incorrect decision to cancel a tenant's subsidy and/or to terminate a tenancy. When such a decision is made, it lies with the tenant to disprove the allegation.

The current review system, in which there is no formal requirement for HNSW to tell a tenant of the case against them, makes it harder for tenants to respond to and to defend allegations. It also increases the likelihood of unfair and incorrect decisions.

RLC also considers it problematic that the current appeal body, the Housing Appeals Committee, is only empowered to make recommendations to the housing provider and its decisions are not binding.

RLC submits that there should be an improved mechanism to ensure procedural fairness that would allow some decisions to be reviewed by a judicial body, such as the New South Wales Civil and Administrative Tribunal (the NCAT). Decisions with such severe consequences deserve external, binding review with the requirement that adverse evidence be put to the tenant before a decision is made.

A fair social housing system gives discretion to decision makers about terminating a tenancy

RLC is concerned by media reports that the NSW Government intends to introduce legislative changes that would have the effect of simplifying the process for evicting tenants for serious breaches of their residential tenancy agreements.⁶ Although we note that no specific proposals have been put forward at the time of writing, one proposal could be to restrict or eliminate the discretion of the NCAT to refrain from terminating a tenancy if the individual circumstances of the case warrant it.

RLC assists a large number of social housing tenants facing the termination of their tenancies in the NCAT. It is our experience that each set of facts varies greatly and the unfettered consideration of all of the known circumstances of each case by the NCAT promotes fair and just decisions.

⁶ A Current Affair, Busting Australia's Public Housing Drug Dealers (18 November 2014) <http://aca.ninemsn.com.au/article/8930624/busting-australia-public-housing-drug-dealers>; See also para 3.3 of Discussion Paper.

To remove discretion at the NCAT in termination matters would have dire consequences for victims of domestic violence and would go against other State government reforms to improve safety and reduce homelessness for women and children. The decision of *Aboriginal Housing Office v Corrie (Social Housing) [2013] NSWCTTT 650* highlights the importance of discretion in the decision whether to terminate a tenancy. The tenant in that case was an Aboriginal woman who was a victim of domestic violence, and who faced termination of her tenancy because her partner had engaged in dealing cannabis from her property. The Tribunal followed the decision of *Cain*,⁷ now overturned, and found it had no discretion to decline to terminate her tenancy. After hearing all the surrounding circumstances, the Member commented:

*“If I had a discretion whether or not to terminate the residential tenancy agreement, I would exercise that discretion in favour of the tenant and I would refuse to make an order of termination...”*⁸

RLC is concerned that narrowing or eliminating the discretionary powers of the NCAT would lead to unjust outcomes, particularly for tenants with mental illnesses, for tenants with addiction problems, for the children of tenants, and for women experiencing domestic violence.

Case study: Discretion

Amanda (not her real name) spent decades sleeping rough on the streets of Sydney and engaging in sex work to fund her heroin addiction. Six years ago, Amanda entered a period of relative stability, starting the methadone program and moving into a Housing NSW unit in Glebe. A traumatic family event a few years later saw Amanda relapse and, as her drug use increased, she started selling small amounts of heroin to fund her addiction.

Police arrested Amanda and searched her unit. A small amount of drugs, resealable bags and a set of scales were found inside.

When Housing NSW learned of her arrest, it commenced proceedings for the termination of her tenancy in the NCAT.

Amanda spent two months on remand and was forced to detox. When she was released on bail, she accessed drug counselling in the community and went back on the methadone program. In recognition of her prospects of rehabilitation, Amanda avoided further jail time on the condition that she continue counselling and submit to random drug tests.

The Tribunal heard evidence that Amanda was determined and able to get her life back on track. Her counsellors and psychologist all agreed that stable housing was key to her rehabilitation and that eviction from her Housing NSW unit at this crucial time would serve to undo all the progress that she had made. She stood little chance of abiding by the parole conditions placed on her by the criminal court if she was homeless.

⁷ *New South Wales Land and Housing Corporation v Cain* [2013] NSWDC 68; decision overturned on appeal - *Cain v New South Wales Land and Housing Corporation* [2014] NSWCA 28.

⁸ *Aboriginal Housing Office v Corrie (Social Housing) [2013] NSWCTTT 650* at [59].

The Tribunal found that Amanda had breached her tenancy agreement by using the premises for an illegal purpose but, in recognition of the surrounding circumstances, decided not to terminate her tenancy.

Almost a year later, Amanda reports that her rehabilitation remains on track and she has had no further problems with police or Housing NSW.

A ‘three strikes’ policy in NSW would not create a fairer public housing system

The Discussion Paper refers to ‘three strikes’ policies, which have been adopted in other jurisdictions in Australia. These policies impose ‘strikes’ on tenants when they are alleged to have broken their tenancy agreements or engaged in anti-social behaviour. When a tenant has three strikes, the social housing provider may take action to terminate their tenancy.

A three strikes policy in NSW would not create a fairer social housing system. Any response to allegations of anti-social behaviour must take into careful consideration the individual circumstances of the tenant, in particular, whether they have a mental illness, their rehabilitation prospects and the underlying causes of anti-social behaviour. Applying a policy inflexibly across the entire public housing population without distinction can result in unfair outcomes which do nothing to address or prevent the underlying cause of any anti-social behaviour.

RLC is concerned that a three strikes policy would see public resources directed towards policing and archiving the behaviour of tenants and away from exploring possible solutions, such as rehousing a tenant or connecting them with appropriate support services.

Another concern is that a three strikes policy could focus tenants’ efforts on responding to allegations and appealing strikes rather than addressing an underlying issue. We consider that some tenants would struggle without the assistance of a support service to give a full and appropriate response to an allegation of anti-social behaviour in a situation where they risk a strike being issued against them.

“I am prone to relapse anyway, to a point where I almost lost my tenancy last year... I don’t know statistically how many people are able to change their ways, I would like to think we live in the sort of society that does give people the option. I was 12 years on the list to get housing, I’d like to think you don’t lose it so quickly when you wait so long to get in. To me it has been a godsend.”

– Darryl James Paine

A fair social housing system allocates properties in the most equitable way possible

As part of the announced relocation of all social housing tenants in Millers Point, Dawes Point and the Rocks, Housing NSW has introduced a process of ‘choice based letting’. Choice based letting allows tenants to bid for available social housing properties, with a tenant selected at random from those who bid.

RLC has assisted many tenants who have negative experiences of choice based letting. Their complaints are that it is not fair or transparent, and does not ensure that a tenant is allocated the most appropriate property for them. Choice based letting disproportionately affects tenants with more complex housing needs by subjecting their applications for suitable properties to chance. The more difficult it is to find an appropriate property for a tenant or household, the longer they must wait under a choice based letting system, and the more likely they are to miss out on properties specifically suited to them.

The Auditor-General's report⁹ drew attention to the changing household structure of applicants for housing assistance and the available stock. A process that involves less consideration of individual circumstances in property allocation will not address this problem.

For the social housing system to be fair, the most appropriate property must be allocated to the tenant or household from the outset. RLC submits that the process should be discontinued and should not be extended more generally in social housing allocation.

A fair public housing system bases rent on affordability, not on desirability

The Discussion Paper refers to the possibility that tenants could be charged more rent for properties in high demand suburbs, or for newer properties.

Making public housing less affordable is not a solution to support tenants or facilitate their independence. Social housing tenants are often already in considerable financial stress. Rent subsidies are already calculated on the basis of need. Any change in a tenant's circumstances or their capacity to pay rent is already considered as part of their subsidy assessment. A sliding rent scale is also administratively burdensome, on top of a system that already includes rent subsidy assessments.

RLC strongly opposes introducing alternate rent models that factor property location and the demand for that location into rent calculations. An income-based model is the fairest way of determining rent – the rent is calculated with reference to what a household can afford. Tenants should not be penalised for their locational needs. Tenants and applicants should be encouraged to remain in their communities, where they are given the best opportunity for stability and to access existing support networks and services.

⁹ Auditor General 'Making the Best Use of Public Housing' (Performance Audit, Audit Office of NSW, 2013).

Pillar 3: A social housing system that is sustainable

Creating a sustainable social housing system is an essential step in providing fairness, opportunity and pathways to client independence. What measures are required to create a sustainable social housing system?

Pillar 3: Our view in summary

1. The community housing sector must be subject to more stringent rules to fulfil the same role as government owned housing.
2. Sale of public housing assets does not make a fairer or more sustainable housing system.
3. More investment is needed to make the social housing system sustainable.

The community housing sector must be subject to more stringent rules to fulfil the same role as government owned housing

A notable trend over the last several years has been the transfer of management and assets from LAHC to community housing providers (CHPs). Since 2009 community housing tenants have made up a large and growing proportion of newly housed tenants.¹⁰ Community housing tenants, however, are not afforded the same protections and rights as tenants of Housing NSW.

Because CHPs are not government entities, their decisions are not subject to administrative review. Community housing tenants also cannot avail themselves of the *Government Information (Public Access) Act 2009* to obtain personal and public information that their landlords hold: an important right that we have assisted many Housing NSW tenants to exercise. It is also our general view that the government landlord has more rigorous appeal procedures and clearer and more accessible policies.

One clear example of the difference is the use of *Residential Tenancy Act 2010* (NSW) (RTA) section 85 termination notices by CHPs. Although the Registrar of Community Housing has sent a directive to CHPs restricting their use, RLC continues to see them used. The use of these notices is concerning, as they don't require a CHP to give a reason for terminating a tenancy and result in almost certain termination. Social housing providers should always have to give reasons for termination, and satisfy the Tribunal that those reasons are sufficient to justify termination of the tenancy. If a tenant is no longer eligible for housing, there are specific termination provisions available in the RTA.

RLC can only support the continued transfer of stock to CHPs and increasing role of CHPs if they are compelled to operate, as much as possible, to the same policy guidelines as HNSW.

¹⁰ Auditor General 'Making the Best Use of Public Housing' (Performance Audit, Audit Office of NSW, 2013) p 15.

CHPs should have transparency in decision-making and robust review of decisions, as well as clear rules for tenants to access their personal information.

Sale of public housing assets does not make a fairer or more sustainable housing system

In March 2014, the NSW Government announced its plan to sell all government owned properties in Millers Point, Dawes Point and the Rocks. RLC opposes the sale of these properties. Since March 2014, RLC has been advocating for tenants in the Millers Point area affected by the decision to sell. The removal of tenants from the area means the loss of community, a significant and irreplaceable loss of inner city public housing, some of which is specifically designed for elderly tenants, and puts further pressure on the waiting list.

RLC is particularly concerned that the Inner Sydney area has become a focus of stock sale due to high property values. Selling stock is not a solution to the lack of public housing in NSW. The Auditor-General's Report found that the strategy of selling properties is "not financially sustainable long-term".¹¹

The Inner Sydney area is a high demand area for housing applicants who have demonstrated a genuine need to access essential local services. As a high demand area with established communities and access to support services, LAHC should be looking to acquire more properties in this area, rather than disposing of them.

"A lot of the services are in the inner city... The support networks I have built up are in the inner city. [To move] would be detrimental to my health, well-being and life in general."
– Paddi O'Leary

More investment is needed to make the social housing system sustainable

There is a clear and urgent need for additional funding to address the drastic undersupply and ageing of public housing stock in NSW, particularly in inner Sydney. The deficiency in funding is recognised in the Discussion Paper, the Auditor-General's report and was discussed extensively as part of the Select Committee Inquiry into Social, Public and Affordable Housing.¹² The social housing system will continue to face challenges in meeting demand and supporting tenants unless investment and supply are increased.

We support the arguments put forward by Shelter NSW and consultants Sphere Company in the paper 'The cost of increasing social and affordable housing supply in New South Wales'¹³ and believe that there are financial models in which the social housing sector can achieve operational self-sufficiency. This could include complexes with a mix of tenants, some of

¹¹ Auditor General, 'Making the Best Use of Public Housing' Performance Audit, Audit Office of NSW, 2013 p11.

¹² Select Committee Report – Inquiry into Social, Public and Affordable Housing, [http://www.parliament.nsw.gov.au/prod/parlment/committee.nsf/0/12b4da4578015782ca257d4d00120ffe/\\$FILE/Report%20on%20Social,%20public%20and%20affordable%20housing%20-%20September%202014.pdf](http://www.parliament.nsw.gov.au/prod/parlment/committee.nsf/0/12b4da4578015782ca257d4d00120ffe/$FILE/Report%20on%20Social,%20public%20and%20affordable%20housing%20-%20September%202014.pdf)

¹³ Shelter NSW, The cost of increasing social and affordable housing supply in New South Wales, <http://www.shelternsw.org.au/publications-new/policy-papers/financing-housing-supply/449-the-cost-of-increasing-social-and-affordable-housing-supply-in-new-south-wales>

whom pay affordable or market rent. We support the recommendations in Shelter's report to establish an annual capital program and a mixed income model of housing.

Conclusion

The views we have presented in this response to the Discussion Paper are informed by our work for and with social housing tenants and applicants in Inner Sydney. A fair and sustainable social housing system is one that can support the growing demand for affordable, secure housing in NSW. A fair and sustainable housing system offers tenants security of tenure, has the flexibility to consider individual circumstances, and has fair and transparent rules for all tenants and applicants.