



REF: SUBMISSION RESPONDING TO SSHR INTERIM REPORT

9 February 2022

Social Housing Regulation Review
c/o-Old Treasury Building
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To the Social Housing Regulation Review Panel,

Thank-you for your thoughtful and conscientious review of the regulation of social housing in Victoria, and your Interim Report recently released for public feedback

As noted in our original submission, I am the Executive Officer of Community Information & Support Victoria (CISVic), the peak body representing 55 local community information and support services, across 64 sites in Victoria. Services provided by our member agencies include: material aid, food, information, advocacy, referral, case management, budgeting assistance, financial counselling, No Interest Loans, and personal counselling. Each year we have contact with around 500,000 Victorians and we are very often the 'first port of call' for people seeking assistance. One of the main difficulties for people using our services is homelessness or precarious housing. Our member agencies witness this as an acute crisis, hence our advocacy on this issue as a peak body for the sector, and for the community.

Firstly I would like to thank the Panel for addressing some of the key areas of concern as per our initial submission. Firstly, that housing should be recognised and safeguarded as a human right, and that the interests of the tenant should direct regulation and provision of housing. This pertains to proposals in Paper 1: *Tenant at the centre*.

While we don't oppose '*Common service delivery standards and regulation across public and community housing*', as per Paper 2, this should be contingent on the highest current standards being preserved, including the better protections of public housing in terms of rental cost and permanency of tenure. Certainly, the 'commercial' imperatives of NFP and privatised models should not be allowed to excuse a lowering of standards, for example in recruiting and evicting 'less financially viable' tenants. In line with this, we support the directions of *Paper 4 – Tenancy sustainment*, especially a '*no evictions into homelessness*' policy, in line with the recognition that housing is a human right.

Community Information & Support Victoria

Overall, we agree with proposal 2.1 that a uniform set of service delivery and asset management standards be applied to public and community housing, combining the best practice elements from both sectors.

The Proposals in Paper 3, *Tenant empowerment*, that focus on facilitating tenant participation in decision making encapsulate a progressive and respectful approach that we certainly endorse. This would maintain standards for tenants over time if implemented well and in good faith, and it could go some way to redress current power imbalances between landlord and tenant.

Other proposals we would like to elevate for endorsement are:

- 5.1 Amend the *Residential Tenancies Act 1997* to require all properties to be compliant with minimum standards introduced in the Residential Tenancies Regulations 2021 by January 2024.
- 5.7 Require all social housing providers to undertake disability modifications, to be accompanied by funding from the Victorian Government where otherwise not funded.
- 7.1 Embed cultural safety in performance standards (for Aboriginal housing) that apply to social housing providers, and encourage the regulator to continue to build on the commitment demonstrated by the Housing Registrar to embedding cultural safety awareness and practices within its Office.
- 9.1 Where affordable housing receives a government subsidy, an accountability mechanism must be in place to ensure that the investment partner delivers on the agreement.

As stated in CISVic's original submission, the most pressing problem to be addressed is the inadequate supply of affordable and secure housing for people on low incomes and those who are disadvantaged. Although this is outside the remit of your Review, we would like to highlight the need for substantial investment in the building of social housing - public housing in particular.

While better regulation for the sector is required, (and the Review has put forward a range of constructive and progressive proposals that we support), it would seem to place a heavy burden on regulatory mechanisms to make up for the fundamental problem of the lack of new public housing over the last few decades. A particular challenge would seem to be preserving the highest standards and levels of empowerment for tenants, while enticing NFPs and private bodies to provide social and affordable housing *in spite of* the higher associated costs. Perhaps the solution will come from a more progressive tax regime that can fund this new regulation as well as the building of much-needed public housing.



Thank-you for your attention to this submission, and please feel free to contact me with any questions or requests for clarification.

Yours Sincerely,

Kate Wheller

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