



4 April 2019

The NRSCH Review  
Att: Ms Anne Campbell  
Executive Director, Housing  
Department of Families and Community Services  
Locked Bag 10  
Strawberry Hills, NSW, 2012

[NRSCHreview@facs.nsw.gov.au](mailto:NRSCHreview@facs.nsw.gov.au)

Dear Ms Campbell

**Re: The Review of the National Regulatory System for Community Housing**

Aboriginal Housing Victoria (AHV) welcomes the opportunity to make a submission to the review of the National Regulatory System for Community Housing (NRSCH). The information provided largely focuses on two key questions identified in the NRSCH review discussion paper:

- i. Assess what changes to the NRSCH, or other options for a future national regulatory system, might be required to support any future decision for Victoria and Western Australia to join the NRSCH; and
- ii. Should the NRSCH be modified to better regulate Aboriginal and Torres Strait Islander CHPs? What would be needed to achieve this?

**Background**

**The Victorian Aboriginal population**

Only 43% of Aboriginal<sup>1</sup> Victorians own or are purchasing a home compared with around 68% of the general Victorian community. This undermines housing security and the capacity to build intergenerational wealth. Low rates of access to the private rental market underscore the significant market barriers Aboriginal Victorians face, including racial discrimination. Cost is also a significant barrier with just 6% of rental properties in Australia affordable to people on income support and just 28% for those on the minimum wage<sup>2</sup>.

Victorian Aboriginal people comprise more than 10% of client met need for homeless services, despite comprising less than 1% of the Victorian population<sup>3</sup>. Victorian Aboriginal people were 11.4 times more likely to be homeless or at risk of homelessness than other Victorians. This compares unfavourably with a national over-representation rate of 8.3 times.

---

<sup>1</sup> Throughout this submission 'Aboriginal' is used to refer to both Aboriginal and Torres Strait Islander people.

<sup>2</sup> Anglicare Australia 2018 Rental Affordability Snapshot

<sup>3</sup> 2019 Report on Government Services, Part G *Housing and Homelessness*

## Aboriginal Housing Victoria

AHV is the largest Aboriginal housing organisation in Australia and achieved accreditation as a registered housing association in 2016. Unlike most Victorian community housing agencies, AHV provides culturally appropriate housing services to low income Aboriginal Victorians throughout metropolitan and regional Victoria.

Improving outcomes for Aboriginal housing tenants drives every aspect of our work. Our tenants are assured of access to an Aboriginal landlord and personalised and culturally sensitive services for Aboriginal people.

We target our housing services to those in greatest need, and draw in the supports our tenants may require so that they can experience the positive life benefits that are achievable with affordable, secure and long term tenancies. As the people we house often have complex needs, the provision of wrap around support services is an increasingly critical component of successful and sustained housing outcomes.

In September 2016, the Victorian Government formally announced the transfer of title to AHV of 1,448 properties that were previously managed by AHV, on behalf of the Director of Housing. The transfer of these properties to AHV was completed in July 2018. As the single largest financial commitment to Aboriginal Affairs in Victoria's history, it represents one of the most significant acts of self determination in this State. AHV's property portfolio, which includes 1,555 housing units (as at 1 July 2018) is valued at around \$500m.

AHV has received funding from the Victorian Government to lead the development of the Victorian Aboriginal Housing and Homelessness Framework. The Framework development process takes a 'rights based approach', which places Aboriginal Victorians and their communities firmly at the centre of housing policy initiatives. In developing the Framework, consultation has occurred with Aboriginal people and service providers, both Aboriginal community controlled and mainstream. AHV has also been working in partnership with Victorian Aboriginal Cooperatives that own/manage small housing portfolios for their local communities, to consider ways in which these small community housing organisations can build their tenancy and property management capacity and potentially grow their housing portfolios.

## Issues

### Limitations of the regulatory system for Aboriginal Community Housing providers and users

The discussion paper notes that, "to date, few Aboriginal or Torres Strait Islander CHPs have registered under the NRSCH, despite the original intentions of the scheme. Current impediments to their participation that have been identified include conflicting legal obligations regarding the disposal of assets in the event of winding up, and the evidence requirements that CHPs need to meet to achieve registration".

As part of the consultative stage of the development of the Victorian Aboriginal Housing and Homelessness Framework, AHV has received feedback from Aboriginal Cooperatives and other service providers on the regulatory standards and processes that may inform the NRSCH review. Although



- Aboriginal community controlled organisations could be resourced to own, use and analyse data;
- Need for state wide, regional, LGA and provider data that identifies numbers, forms of homelessness, and services/service gaps.

As the final consultative activity in the development of the Victorian Aboriginal Housing and Homelessness Framework, AHV is coordinating an Aboriginal Housing and Homelessness Summit, which will be held in Melbourne on Friday 5 April, 2019. Over 100 participants have registered for the Summit, including representatives from Victorian Aboriginal peak bodies and Aboriginal cooperatives, Aboriginal service agencies, Aboriginal service users, government, industry, and academic experts.

One of the session topics is “building the supply of social and Aboriginal community owned housing”. Should issues be discussed in this session that are potentially relevant to the NRSCH review, we would be happy to provide further advice to inform the review process.

#### Transition to a national regulatory system

AHV recognises the benefits of a national regulatory system. However, clarification of the proposed process for any future transition from the Victorian system to a national system is required.

AHV achieved Victorian Housing Association status at the end of 2015 and is the only Aboriginal housing organisation in Australia to achieve this level of accreditation. This was the culmination of an enormous effort over an extended period as we worked to improve our performance; build internal capacity; create strong external relationships; and modernise our governance structures and practices, in order to meet the exacting accreditation standards.

While we recognise the importance and value of achieving housing association status, as a relatively small organisation in terms of staffing numbers, the sustained focus required to become an accredited housing association, as a precursor to title transfer, was a resource intensive and costly process for AHV.

AHV would therefore support a transition process to a national regulatory system that recognises the existing status of registered Victorian housing providers. However, we could not support a resource-intensive, formal re-accreditation process that may have cost implications for community housing agencies, and may potentially disrupt their capacity to maintain delivery of quality, affordable housing services to Victorian clients.

If members of the NRSCH review working group wish to discuss any of the issues raised in our submission, please do not hesitate to contact [REDACTED]

Yours sincerely



Darren Smith  
CEO