



INNER SYDNEY VOICE
regional social development council

5th April 2019

The NRSCH Review
Director - Housing
Strategic Policy - Commissioning
Department of Families and Community Services
By email only

Re: Submission to the Review of the National Regulatory System for Community Housing

Inner Sydney Voice

Inner Sydney Regional Council for Social Development (trading as Inner Sydney Voice) is a community organisation that works in the Inner Sydney and Eastern Suburbs areas providing NGOs, Not-for-Profits, communities and individuals with information, resources, support, and community development opportunities. We advocate on issues related to housing and equity, representing community organisations and residents, in particular social housing tenants, to government and other relevant organisations.

We build capacity within communities, so organisations and individuals are able to address their issues and needs. The community development philosophy underpins all of our activities. We believe in social justice, social inclusion and the participation and empowerment of local people. Inner Sydney Voice has a strong presence within local social housing communities, having managed a Tenant Participation Resource Service for over 15 years and works closely with the Community Housing Tenant Network NSW.

General Comments

Inner Sydney Voice welcomes the opportunity to comment on the Review of the National Regulatory System for Community Housing and would also like to recognise the Tenants Union NSW for research support for this submission.

We support the vision of the NRSCH Charter of a robust, well governed and well managed community housing sector that meets the housing needs of tenants, recognising security of tenure increases economic and social benefits for tenants. The advice we provide in this submission is solely focused on best outcomes for tenants through tenant participation models.

Consultation Question 19 – How has the NRSCH affected tenant outcomes?

Recommendation 1 – Clearer articulation of Tenant Participation requirements

Inner Sydney Voice asserts the Community Housing Regulatory framework needs to more clearly articulate what is expected from Community Housing providers in relation to tenant participation. The code needs to ensure a strong voice for tenants in the community housing

sector and to recognise the value of tenant input in to the decision making and governance of providers and the benefit this brings to both tenants and providers. The code should dictate methods which allow effective scrutiny by tenants of their landlord's performance. There is significant evidence to show vigorous and valued tenant participation leads to, not only improved tenant satisfaction but also contributes to the financial sustainability of housing providers.¹

Currently, the regulation allows for different interpretation from each provider about what tenant engagement means and looks like. This creates wide variation and disparity in the standard and degree to which providers develop and deliver tenant participation and/or community engagement programs, creating an inequity for community housing tenants. Engagement practices may range from little more than satisfaction surveys to well-supported tenant advisory groups to tenant representation on community housing provider's boards.

This inequity is further widened by the fact that public housing tenants in NSW have access to a resourced independent Tenant Participation support service, such as the Tenant Participation and Community Engagement Program (TPCE) delivered by a Non-Government Organisation. The Regulator can play a role in ensuring consistency and compliance in delivering best practice in the realm of Tenant Participation by properly incentivising and/or driving accountability.

Recommendation 2 – Independent Resourcing and Support Body for Tenant Participation Mechanisms

There is an inherent conflict in tenant's providing scrutiny and raising systemic issues with their own provider. It leads to examples we are currently seeing within certain Community Housing providers where tenants are handpicked for consultative groups, models lacking in sound representative structures. Regulation should play a role in ensuring effective and consistent tenant involvement.

Inner Sydney Voice would contend that for meaningful dialogue to take place between tenants and providers and the sector as a whole, the mechanism for doing so should be through an independent organisation, resourced either through the regulator or through a levy on providers. Such an entity, with the right investment and resourcing, could support training and development opportunities for tenants, build trust between providers and tenants and assist in ensuring tenants' participation activities actually influenced decisions and policy.

This conflict and inequity is reflected in the conversations we have with Community Housing Tenants, both those of longstanding tenure and those who have just recently changed to a Community Housing provider through the Social Housing Management Transfer Scheme. Tenants are concerned about proper representation, integrity in their consultation with providers and recognition of their knowledge and abilities. Some tenants report feeling patronised by their providers through their participation and engagement processes. And

¹ Bliss N, Lambert B, Halfacre C, Bell T & Mullins D (2015) *An investment not a cost: the business benefits of tenant involvement* Department for Communities and Local Government (UK)
<https://nationaltenants.files.wordpress.com/2015/03/tlc-an-investment-not-a-cost.pdf>

many report a lack of distinction by providers of the difference between tenant participation and community engagement.

To this end the Code should require housing providers to demonstrate a systematic approach to tenant involvement and empowerment along the lines of the 2017 UK Homes and Community Agency Standard ² as well as explore opportunities for independent tenant participation mechanisms.

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Executive Officer
Inner Sydney Voice

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/725831/Tenant_Involvement_and_Empowerment_Standard.pdf