

5 April 2019

The NRSCH Review
Director – Housing,
Strategic Policy – Commissioning,
Department of Families and Community Services.
Locked Bag 10,
STRAWBERRY HILLS NSW 2012

Via: NRSCHreview@facs.nsw.gov.au

Dear NRSCH Working Group Members,

Re: NRSCH Discussion Paper

Barnardos Australia (Barnardos) thanks the National Regulatory System for Community Housing (NRSCH) Working Group for the opportunity to participate in discussion of the issues raised in the NRSCH Review Discussion Paper and to contribute our knowledge to the effective implementation and operation of an improved NRSCH.

Background: Barnardos knowledge of this area

Barnardos is a family support and out-of-home care (OOHC) agency, which assists over 14,409 children and their families in New South Wales (NSW) and the Australian Capital Territory (ACT) each year and maintains 1,415 children in NSW and the ACT in foster and kinship care. In our family support work we aim to reach vulnerable children at risk of separation from their families, and we work in areas with significant Aboriginal populations¹ such as Western Sydney, Central West NSW, the South Coast and Inner Sydney.

We are committed to supporting families in caring for their children and to ensure permanency for children who cannot safely live at home. In 2017-18 we achieved 38 adoptions from care, which represented 26% of the 140 adoptions in NSW and 27% of all adoptions from care nationally.² Of the 7 adoptions from care in other Australian states and territories in the same period, Barnardos achieved two in the ACT.

We take seriously the need to ensure that the next generation does not suffer the problems of the past. For this reason, we work together with children, young people and families to break the cycle of disadvantage, creating safe, nurturing and stable homes, connected to family and community.

Our community housing services and properties form a small but critical element of our integrated response to ameliorating the problems of intergenerational disadvantage and trauma our clients face. Our relevant expertise lies in the development and delivery of evidence informed service models (including integrated housing services) for interventions

¹ Note that we use the term “Aboriginal” throughout our response to reflect that in the NSW and ACT there are only very small numbers of people who report they are of Torres Strait Islander origin.

² Barnardos achieved 36 open adoptions in NSW and 2 in the ACT. NSW achieved 140 of the 147 carer adoptions finalised in Australia in 2017-18.

targeted at children, young persons and families at high risk or vulnerable to child maltreatment due to, for example, parental substance abuse, parental mental health concerns, or intimate partner violence.

We strongly welcome the NRSCH Working Group's recognition that an improved regulatory system must first and foremost have the flexibility to work for the diversity of organisational models and scale among community housing providers (CHPs).

For example, our experience as a bespoke provider of targeted specialist services for specific clientele, notably children, young persons and families most at risk of child maltreatment and exposure to harm, gives us a distinctive perspective which may differ from the views of large-scale growth providers whose core business is accommodation. Our organisational focus is on reducing homelessness and assisting our tenants, not managing housing assets.

Our community housing services

Barnardos Australia is a registered Community Housing Provider (CHP). Registration for the agency with NRSCH sits with our Canberra Centre (as our Centre with the most community housing properties). Barnardos adheres to the National Regulatory Code and complies with the seven domains as a Tier 3 Provider.

As a Tier 3 CHP Barnardos has properties in Canberra, Auburn and Penrith, some of which are owned by Barnardos (in the latter two locations), but in the main are head leased from relevant Housing Authorities. We provide the following types of targeted services:

- transitional accommodation for people who are homeless or at risk of being homeless (Auburn, NSW);
- medium-term semi-supported accommodation for families (Penrith, NSW);
- temporary accommodation for young people facing homelessness including transitional and short to medium-term housing for young people in care (Our Place, ACT); and
- homelessness services (shared accommodation) for males and females aged 16-25 years (Barnardos' Friendly Landlord Service, ACT).

As an indication of scale and the geographic scope of our services, as an agency:

- we operate 52 properties at any given time;
- our number of tenancies has fluctuated – in 2017 this was 106, while in 2018 it was 85;
- our 65 tenancies for the current reporting period were all individual tenancy agreements;
- our total potential rental income for all properties was \$277,520; and
- our properties are all located in communities experiencing elevated levels of disadvantage: Auburn (4 properties); Penrith (6 properties); and Canberra (45 properties).

We have focussed our comments on the areas of the Discussion Paper most relevant to our experience as a service provider.

Purpose of Community Housing Regulations (Part 2, pp 8-10, Q1-Q3)

In our view:

- The focus of regulation must remain on protecting the interests of vulnerable clients.
- There is an overwhelming need for a single consistent national approach to accreditation for community housing and homelessness services providers, focussed on tenant outcomes.
- We welcome the vision for the NRSCH framework to provide a nationally uniform regulatory system. However the implementation to date has been onerous on service providers with few improved tenant outcomes and protections for vulnerable tenants.
- An improved NRSCH must take a more differentiated approach to treating governance, management, probity and financial risk including better tailoring reporting and compliance requirements according to organisational model, size, and type of service.
- It should reduce the regulation burden and facilitate contractual compliance for both smaller entities and equally for large non-government agencies who provide community housing as part of a spectrum of integrated services and who are already subject to extensive regulation and administrative oversight.
- A strengthened NRSCH would fully align and integrate with other regulatory systems and apply standards to reduce duplication in regulatory requirements and reporting. This would include requirements in relation to the role of the Australian Securities and Investments Commission; the Australian Charities and Not-for-profits Commission (ACNC); the National Housing and Homelessness Agreement; Aged Care Quality Standards; National Disability Insurance Scheme (NDIS); National Housing Finance and Investment Corporation (NHFIC); and National Rental Affordability Scheme (NRAS); as well as the Australian Service Excellence Standards (ASES) and key state and territory quality assurance processes.

We also would note that:

- Feedback from the regulator is not currently as beneficial to the agency as when they had to previously undergo accreditation – this needs to be addressed in consultation with service providers.
- To reduce bottlenecks in reporting, information reporting portals should permit data to be uploaded year-wide not just within the applicable reporting period. In addition, more than one delegated staff member should be permitted to have system access per agency.
- Whilst we welcome initiatives to increase affordable housing, in our experience these programs are still only accessible to low income earners, not our clients who are typically solely reliant on Commonwealth income support.

- The skills set and local knowledge of the NRSCH assessor can greatly assist the process. We have been very fortunate as an agency to have an excellent collaborative relationship with the local NRSCH team in the ACT (where our registration sits). Measures to strengthen collaborative relationships with the local NRSCH teams are vital to an improved NRSCH.

We would welcome the opportunity to discuss any aspect of our submission. Please feel free to contact [REDACTED].

Best regards,



Robert Urquhart PhD

Head of Knowledge, Outcomes and Research

Barnardos Australia