



**Community Housing**  
INDUSTRY ASSOCIATION

# CHIA

## Safe Places Inclusion Round Submission



**March 2023**

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## Introduction

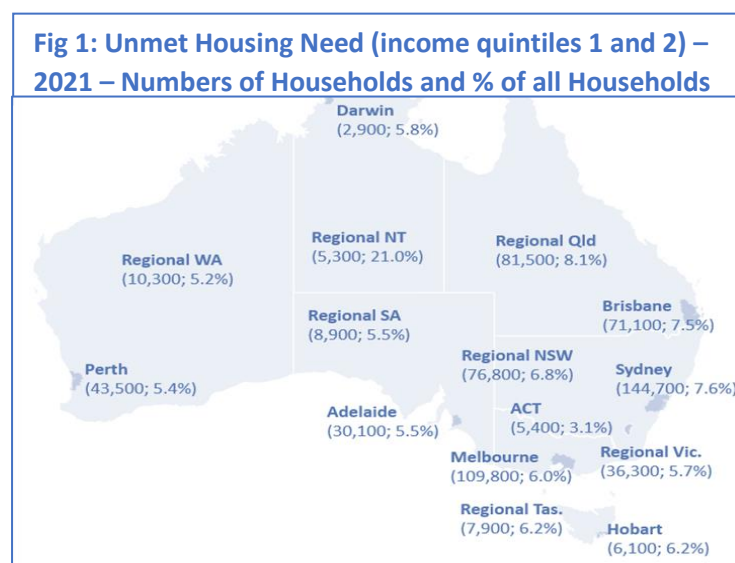
**CHIA is the peak body representing registered not for profit community housing organisations (CHOs) across Australia. Our 150+ members manage a \$40 billion-plus portfolio of more than 115,000 homes, housing people on low and moderate incomes disadvantaged in accessing affordable and appropriate tenancies in the private market. Collectively the sector has experience in housing development, tenancy and asset management services, and specialist homelessness services. All our members are registered in one of Australia’s three community housing regulatory regimes.**

The Community Housing Industry Association (CHIA) is pleased to respond to the Safe Places Emergency Accommodation Program (Inclusion Round) design discussion paper. Our response is largely based on the session we held with members to discuss the paper but it also incorporates points previously shared with the Department of Social Services (DSS) at a joint summit in September 2022 to feed back on the first Safe Places funding round.

In our submission we have primarily identified issues that we would like to explore at the forthcoming consultation workshops. We have structured the submission to follow the specified questions but have highlighted two overarching concerns in relation to: (1) funding for ongoing specialist support and (2) shortfalls in safe, secure and affordable move-on accommodation.

The Safe Places initiative essentially provides a capital contribution for the construction of emergency accommodation. Applicants will be required to identify resources to provide ongoing tenancy and asset management services and source specialist support services, for a minimum of 15 years. CHIA and its members have previously raised the need for the Commonwealth to work with state and territory governments to secure / ensure ongoing operational funding for additional emergency accommodation. Given the vulnerability of the groups prioritised in this inclusion funding round it is even more important that the DSS have engaged with the states and territories to ensure there is in principle support for extending specialist services where there are gaps or no spare capacity. We have previously suggested this could involve negotiating tripartite funding agreements between the two levels of government and the successful applicants.

The discussion paper is silent on the question of move-on long term housing options even though it is assumed stays in emergency accommodation will not exceed 12 months. At the time of the 2021



Census, there were 659,000 lower income households either homeless or in rental stress, i.e., paying more than 30% of income on housing costs – see Figure 1.

Given the particular vulnerability of the inclusion round priority groups it is unlikely that suitable move-on accommodation will be easily sourced – even factoring-in the intention to prioritise older women and those experiencing DFV for 4,000 of the new homes constructed under the Housing Australia Future Fund.

Furthermore, our members tell us that many women and children experiencing family violence and homelessness who access their services often have complex needs that include child protection issues, substance use, general health, mental health, and trauma, and, have very low incomes. These households require greater and long-term support to rebuild independence and achieve stable, fulfilling lives. Across Australia there are very few options available.

We therefore believe this round should (1) be explicitly open to bids to develop longer term supportive housing options and (2) require applicants to demonstrate expertise and experience in assisting clients to secure longer term accommodation.

We welcome the DSS intention to publish information about needs. Our members tell us that there are areas where accommodation for any woman is in extremely short supply and this round should identify these ‘hot spots’. It would also be extremely useful if DSS can also work with states and territories to assess DFV support service availability and capacity so gaps are recognised and an approach agreed to address these.

## Consultation Questions

### 1. Are the proposed funding amounts of between \$500,000 and \$8 million per project appropriate for Inclusion Round grants?

This seems reasonable. More important is to accept that the proportion of grant, subsidy or donation to total project cost will generally be considerably higher than for mainstream social and affordable rental accommodation. Most clients will be unable to afford accommodation fees or rents at least initially and for some including those on temporary visas, this may remain the case. This impacts on the ability to fund good quality tenancy and asset management services and constrains applicants ability to take on debt to part-fund development.

In our consultation session there was appetite for a discussion at the workshops on DSS expectations around charging clients.

### 2. Should applications for mixed-use type proposals secure funding (e.g. loans, state funding, philanthropy) for the long term housing aspects of their proposal prior to seeking Inclusion Round funding?

There was strong support and interest in the mixed use type proposals being included – as long as appropriately designed. Clearly applicants are hostage to (usually) government funding program timelines,

so inflexible rules will rule out options. At the very least the DSS should be aligning their procurement processes to the first round of HAFF (assuming the legislation passes later this month.)

**3. Is the proposed milestone schedule the best model for delivering capital grants under the Inclusion Round?**

Our members felt this was acceptable given that there is flexibility built in.

**4. Will Development Periods encourage community-based DFV service organisations to apply for funding?**

This is a property development and management opportunity and thus applicants for grants (including community based DFV service organisations) should be able to demonstrate experience and expertise in property development, asset and tenancy management. We anticipate that specialist DFV service providers without the relevant expertise would partner with an applicant with this expertise.

There are already many examples of partnership arrangements between registered community housing organisations (CHOs<sup>1</sup>) and specialist DFV services and where these are in place and appropriate for the priority cohorts that are the focus of this round, six months is probably sufficient. One of the organisations attending our consultation session noted that in a recent joint initiative it took around six months to finalise financing and funding agreements even though the accommodation and service provider were well known to each other. This simply reflected the difficulty of funding ongoing services and management when clients are unable to pay much in way of a fee for service.

Feedback from the previous Safe Places round noted that the previous focus on ‘shovel ready’ projects had led to better options being missed. There is some debate (worth further exploration in the workshops) on the merits of an initial EOI process which would allow applicants sufficient assurance to work up a more detailed proposal. This might be useful where suitable services are thin on the ground – particularly in more rural and remote areas.

**5. Are there other ways to support applicants to develop high quality proposals?**

The main support the DSS can provide is firstly to sound out the states and territories on their willingness to contribute resources to fund additional specialist DFV services where there are gaps or services are already overstretched. The second is to encourage proposals for transitional / longer term supportive housing. Both these will transform the quality of and outcomes from the funding.

**6. Are the proposed eligibility and assessment criteria appropriate and able to be demonstrated?**

The lead applicant for receipt of the grant should be an organisation with expertise and experience in property development and tenancy and asset management. Their experience in tenancy and asset management must include expertise in providing these services to households experiencing DFV and for the particular priority cohorts included in their bid. CHIA and CHIA members have recognised the

importance of tailoring tenancy management to women experiencing DFV – see Fig 2 below - and would welcome the support of DSS to implement this work.

We strongly recommend that DSS requires lead applicants to be registered in one of the three community housing regulatory schemes or to have secured registration before the release of any grant. The discussion paper pays insufficient attention to the product the scheme is funding - the property asset. By restricting the scheme to registered CHOs, DSS can rely on annual compliance assessments of tenancy, asset management etc. CHOs are also required to demonstrate good governance, financial management and have appropriate support partnerships. There are also standard processes to protect residents in the unlikely event that a CHO runs into trouble. Given the long term nature of the service provision if non registered organisations are included, DSS should outline what alternative measures they will put in place to ensure residents' safety.

Where the organisation does not have expertise in the provision of specialist support services, the lead applicant should partner with appropriately qualified services.

**7. Are there additional criteria that should be considered?**

DSS should require a minimum energy performance - and consider favourably schemes that exceed the minimum. DSS should also require applicants to outline how they will seek to assist clients with move-on. Proposals that commit to retaining the accommodation within the social / affordable / acute needs sector beyond the 15 years should be prioritised.

- 8. What are the best measures to determine an applicant's suitability to meet the needs of First Nations women and children?**
- 9. What are the best measures to determine an applicant's suitability to meet the needs of women and children from CALD backgrounds?**

**DFV Community Housing Standard**

This project came about because the sector has recognised the important role social landlords play in identifying and responding to domestic and family violence. CHIA secured philanthropic funding to develop a toolkit and a National Community Housing Standard (NCHS) to support CHOs to strengthen their housing management practice in responding to DFV, with that work having commenced in 2021. This project is now in its final stages with feedback being incorporated into the documents.

These resources will support CHOs to implement approaches (consistent with their role as tenancy and property managers) to identifying and responding to DFV that assist victim-survivors to either remain safely in their home or relocate to a safe environment. They also provide information on the range of services and supports available to perpetrators of DFV. It also provides a set of criteria that will enable CHOs to assess their services against best practice. Ultimately, we hope that CHOs will seek to demonstrate their competence by choosing to be independently accredited against the standard.

CHIA has been supported by CHOs across Australia, receiving advice and feedback on the resources as they have been developed. The project has been overseen by an advisory council bringing together experts from the domestic and family violence sector, including ANROWS and No To Violence. CHIA has also consulted with the UK Domestic Abuse Housing Alliance (DAHA) which was set up in September 2014 to embed 'best practice' and establish accreditation for housing associations.

**10. What are the best measures to determine an applicant’s suitability to meet the needs of women and children with disability?**

Applicants should either demonstrate existing expertise and experience (or have a partner that can do this). Typically, they would already have a track record of performance or, if new, have a management team and strategic plan that provides confidence of future performance.

**11. What standard of the Liveable Housing Australia design guidelines should emergency accommodation for First Nations women and children, women and children from a CALD background and women and children with disability meet?**

We found this difficult to answer as clearly this will in part depend on the identified needs and proposal being made. We assume there will be a minimum silver standard. There are additional costs involved in gold and platinum standard provision. DSS should factor this into their assessments of a tenderers costs.

**12. Is the proposed designated use period of 15 years appropriate?**

Proposals that aim to retain the accommodation within the social / affordable and acute housing system should be prioritised. We are open to the accommodation being retained in perpetuity with the option to vary their use if needs change.

**13. What is the best measure for determining an applicant’s ability to support clients using the emergency accommodation over the designated use period?**

Ensuring applicants are registered CHOs – see above.

**14. Are the definitions for ‘emergency accommodation’, a ‘safe place’, and a ‘specialist service’ appropriate?**

- **Should the definition of ‘emergency accommodation’ include longer stays?**

There are concerns that a place includes two people sharing a bedroom. This may be inappropriate and thus there needs to be flexibility to ensure that proposals that recognise the need for single occupancy are not disadvantaged.

**15. Are there alternative accommodation options that should be considered as eligible or not eligible for Inclusion Round funding?**

As noted it is disappointing that long term supportive accommodation is not included. We would welcome this being a focus of workshop discussions.

Finally, we appreciate the opportunity to comment, would be pleased to clarify or elaborate on any of the points we made, and, look forward to the workshops.

## References

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<sup>1</sup> When referring to CHOs we include registered Indigenous or Community Controlled organisations