



VICTORIAN PUBLIC
TENANTS ASSOCIATION

Response to the National Housing and Homelessness Plan Issues Paper

OCTOBER 2023



Who We Are

The Victorian Public Tenants Association (VPTA) is the voice of public housing in Victoria.

As the peak body representing existing public housing renters and those on the waitlist, our goal is to provide advice to renters and applicants, and to improve and expand the public housing system in Victoria. Although not formally part of our role, we also assist community housing renters where possible.

We believe all social housing renters deserve a representative voice, regardless of their specific tenure type.

While our work is in Victoria – we are the only peak body in Australia which exclusively represents public housing renters or people who live in social housing.

We undertake systemic advocacy and provide policy advice to the Victorian Department of Families, Fairness and Housing ('the Department'), undertake community engagement work and operate a free and confidential telephone advice service. In the 2022-23 financial year we assisted more than 1,000 residents and applicants with in-depth advice and assistance and experienced a 94 per cent increase in workload.

Submission Outline

Thank you for providing an opportunity to give feedback on the National Housing and Homelessness Plan Issues Paper, and to participate in the creation of the roadmap to address Australia's serious problems with access to safe, secure and affordable housing and homelessness.

The VPTA has more than aspirations for the new National Housing and Homelessness Plan ('the Plan'), we have expectations. We expect bold targets and brave decisions so that Australia can once again make good on its claims of being 'the lucky country.'

This submission first responds generally to the Issues Paper circulated, as well as to relevant sections of the Productivity Commission's report, 'In Need of Repair.'

The VPTA notes that Government will consider the Productivity Commission's recommendations from this report in shaping the Plan, and the section below outlines key concerns this organisation holds about some recommendations in that report.

Response to Issues Paper

The VPTA welcomes action from the Federal Government towards addressing housing and homelessness issues in the broad Australian community.

The simple fact of the matter is that what we are doing now, our high level of reliance on private landlords and the collective obsession with property, is simply not working. The need for a new National Plan has never been more urgent.

The bulk of this submission is dedicated to housing and the management of social housing tenancies as a key driver in homelessness prevention.

The VPTA endorses the recommendations of Homelessness Australia on the topic of the reforms required to make experiences of homelessness in Australia rare, brief, and non-recurring.

Interact with other Plans and Strategies to aid prevention

Safe and secure housing is a core human need. While it is certainly true that a lack of housing can prevent the resolution of other issues, particularly long-term unemployment, chronic health concerns and educational attainment – it is also true that homelessness can be an indication of failures in other service systems.

The centrality of housing means that housing and homelessness issues are inextricably linked to other community concerns.

The 2008 White Paper, *The Road Home*, rightly argues “there are many causes of homelessness – violence and family breakdown, mental health and substance abuse, lack of affordable housing, leaving care and protection or other institutional care.”¹

While this is the case in all areas, a particularly clear example is family violence and gender inequality more broadly.

We see this in the growing proportion of older, single women who experience homelessness more than any other cohort.² This is a symptom of the inequality in other areas of the community.

Likewise, Australia’s First Peoples, Victim Survivors of Family Violence, and people with disability are cohorts that are identified as requiring access to housing support or homelessness services more often than other groups of the community.

For example, the Victorian Aboriginal Housing and Homelessness Framework, *Manana woorn tyeen maar-takoort* showed the Aboriginal and/or Torres Strait Islanders seeking homeless assistance were more likely than others to:

- Have children under 10 (22 per cent cf 15 per cent)
- Be younger than 25 (54 per cent cf 40 per cent)
- Already be experiencing homelessness (47 per cent cf 43 per cent)
- Need access to emergency accommodation (51 per cent cf 36 per cent)
- Leave accommodation sooner (20 days cf 41 days)
- Need assistance to access meals (29 per cent cf 14 per cent)
- Need laundry and/or shower facilities (25 per cent cf 11 per cent), and

¹ Australian Government, ‘The Road Home’, 2008, pg 2.

² Australian Human Rights Commission, ‘Risk of Homelessness in Older Women’, (online), <https://humanrights.gov.au/our-work/age-discrimination/projects/risk-homelessness-older-women#:~:text=Older%20women%E2%80%94those%20aged%2055,2016%2C%20increasing%20by%2031%25.,> accessed 4 September 2023.

- Need help with transportation (32 per cent cf 19 per cent).³

When a person is experiencing homelessness, it is generally the last or most extreme outcome – it is rarely immediate, and it can be prevented.

Therefore, the Plan cannot be a standalone document. The Plan should reflect the centrality of housing as a core human right and speak directly to other Government plans and strategies so that we can turn off the tap at the root of the original issue and prevent homelessness and housing insecurity to begin with.

Include strong, specific targets for public housing

A strong, reliable, and accessible public housing safety net is our best defence against experiences of homelessness. For many, public housing is the last line of defence against an experience of homelessness and the first realistic pathway out of it.

Public housing plays a particularly important role and has a greater preventative affect than community housing:

“Importantly, we found public housing to be a very strong protective factor reducing homelessness. Public housing is particularly effective because it is affordable. It has also traditionally offered a long-term, secure housing option for those at the bottom of the housing market. This is because public housing leases provide the benefits of security of tenure commonly associated with home ownership. Community housing on the other hand appears not to offer the same level of protection. These findings emerge despite community housing being affordable, however security of tenure is weaker possibly because providers are more dependent on rent revenue and therefore less tolerant of rental arrears.”⁴

The Road Home set an ambitious target to halve overall homelessness by 2020 and to offer support accommodation to all rough sleepers who need it by 2020.⁵

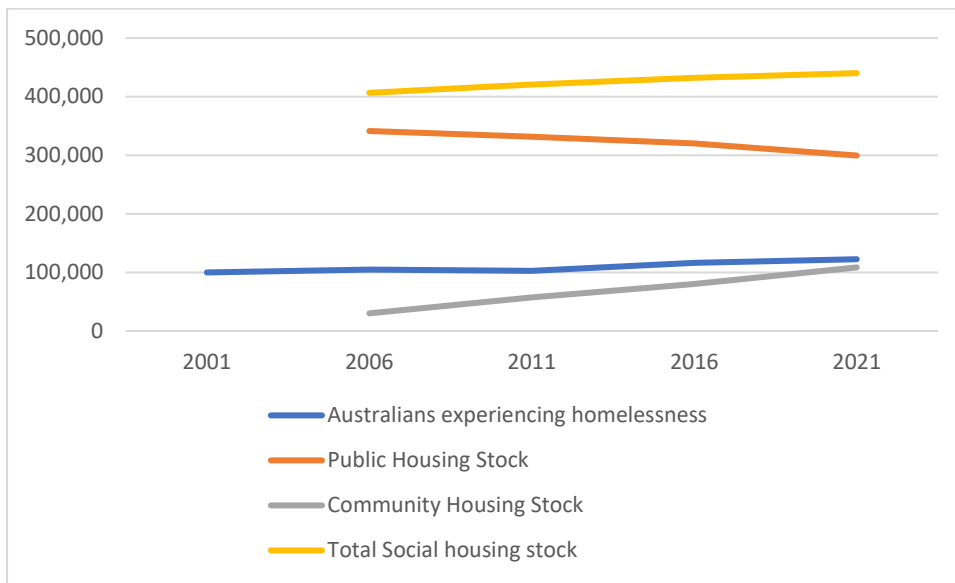
As a nation we did not rise to meet the moment. Instead, we have fallen further behind. The graph below shows changes in the make up of Australia’s social housing stock portfolio over time, alongside changes in the number of Australian’s experiencing homelessness.

³ Aboriginal Housing Victoria, Mana-na worn-tyeen maar-takoort: The Victorian Aboriginal Housing and Homelessness Framework’, pg 73.

⁴ Johnson G, Scutella R, Tseng Y and Wood G, ‘How do housing and labour markets affect individual homelessness?’, Housing Studies, 2018, <https://doi.org/10.1080/02673037.2018.1520819>.

⁵ The Road Home, pg viii.

Figure 1. Changes in numbers of people experiencing homelessness and social housing stock by tenure type



Sources: Social Housing Stock figures from Australian Institute of Health and Welfare, Housing Assistance in Australia, Figure One, Dwellings by social housing program, at June 2006 to 2022. People experiencing homelessness from Australian Bureau of Statistics, Estimating Homelessness: Census, Graph One, Counts of people experiencing homelessness by sex, Australia 2006 to 2021.

The graph above shows that when it comes to social housing tenure, type matters.

Despite the overall stock portfolio increasing between 2006 and 2021 by 8.3 per cent⁶, the number of people experiencing homelessness between the 2006 and 2021 Census increased by 17 per cent.⁷ Over the same time period, Australia’s public housing stock portfolio shrunk by 12.3 per cent.⁸

In the past, policymakers have been tempted to inaction through an expectation that the market will respond in time to resolve issues with regard to housing. Likewise, there is great enthusiasm about drawing institutional investment to social housing provision to fill financial gaps.

Respectfully, if the market was going to intervene quickly – it would have done so by now. The delivery of social housing is not profitable, it is core service delivery. It is both an actual and ethical responsibility of Government.

The Issues Paper correctly recognises social housing as being important social infrastructure:

⁶ Calculation, based on total numbers shown in AIHW figure, ‘Dwellings by social housing program, at June 2006 to 2022’, accessed 11 September 2023, <https://www.aihw.gov.au/reports/housing-assistance/housing-assistance-in-australia/contents/social-housing-dwellings>.

⁷ Calculation, based on Census data accessed 11 September 2023, <https://www.abs.gov.au/statistics/people/housing/estimating-homelessness-census/latest-release>.

⁸ Op cit 6.

“Social housing is important social infrastructure...social housing also impacts on productivity and participation, and well-located social housing with amenity assists tenants to build and maintain social and economic wellbeing.”⁹

The Plan should make clear that social housing, and especially public housing, spending should be considered in the same way as education and health spending, as being core to the delivery of a healthy and vibrant, equal society.

In recent years, demand from community housing renters for the VPTA’s assistance has increased. In 2021-22 around 2 per cent of the VPTA’s total workload was community housing renters. In 2022-23 this increased to 6 per cent.

Further, community housing renters were more likely to contact the VPTA with concerns regarding rent (13 per cent of community housing cases were regarding rent, compared to 8 per cent of VPTA clients overall), or seeking to move to a different social housing property (38 per cent of cases for community housing renters were regarding a transfer application, compared to 27 per cent of VPTA clients overall).

Victoria’s waiting list data confirms the strong preference renters have for publicly owned and managed housing over community housing. Victoria’s joint public and community housing waiting list, the Victorian Housing Register (‘VHR’) had 65,195 applications.¹⁰ Of those, most (73 per cent) indicated a willingness to consider either tenure type, but 24 per cent indicated a willingness to only consider public housing.¹¹

The Plan must go beyond the current method of Governments to achieve cost savings by preferencing community housing as the only growth mechanism for social housing. The Plan must set a strong target that requires a substantial proportion of new publicly owned and managed housing to provide protection and security to the Australians who need it most.

Fund public housing fairly

Support for each type of social housing should be delivered fairly.

The VPTA is concerned that at present, a greater amount of federal support may be being directed to community housing renters rather than public housing renters.

The existing National Housing and Homelessness Agreement distributes \$1.6 billion annually to States and Territories, in amounts proportionate to their share of the population.¹²

⁹ Commonwealth of Australia (Department of Social Services), ‘National Housing and Homelessness Plan Issues Paper’, pg 45, 2023.

¹⁰ Homes Victoria, ‘Applications on the Victorian Housing Register (VHR)’, <https://www.homes.vic.gov.au/applications-victorian-housing-register-vhr#preferred-social-housing-providers>, accessed online, 2 October 2023.

¹¹ Ibid.

¹² Ibid, pg 20.

Jurisdictions use this money to subsidise their responsibilities to deliver social housing to constituents – both through publicly owned and managed, public housing, and community housing. This funding is the only support States receive from the Federal Government to offset the cost of administering public housing. The receipt of these funds is likewise the reason that public housing residents are not eligible to receive Commonwealth Rent Assistance.

Community Housing providers may receive State support to acquire or upgrade new properties, or otherwise deliver a service, in addition to the Commonwealth Rent Assistance that is captured from rents.

Both social housing tenure types are needed if we are to seriously address the overwhelming inequality in this country with regards to access and affordability of shelter. However, as figure 1 shows, at present, only one is growing while the other has been left to decay.

This is an unacceptable outcome.

Individual jurisdictions must be required to ensure their public housing stock portfolio is growing. One way to achieve this would be to grant eligibility to public housing renters for Commonwealth Rent Assistance, or to otherwise require jurisdictions to only use Federal funds for their publicly owned and managed properties.

The Productivity Commission repeats an argument that community housing providers' ability to attract funding beyond Government makes it more financially viable.¹³

Although the VPTA would contest the hypothesis that community housing is a more financially viable social housing tenure type, it is correct that providers can source funding from other sources, including partnerships with large private firms.

The Issues Paper argues:

“Funding for social housing should flow through to the most effective and efficient providers of housing support, where housing outcomes can be optimised and be focused on housing assets that meet current and future needs of social housing tenants.”¹⁴

The VPTA strenuously considers that public housing is the tenure type that best fits this description. It is public housing that is most accessible in terms of allocations from wait lists. It is public housing that has the best guaranteed affordability and the most protected security of tenure. It is public housing that has the backing of Government and is most financially capable of working with residents through difficult times to re-establish positive behaviours when issues occur, particularly when these impact the ability to maintain rental payments in the short term.

Recently, the VPTA began assisting a community housing renter called Joe (pseudonym). Joe sought assistance to understand his rent arrears. Joe had

¹³ Productivity Commission, 'In need of repair: The National Housing and Homelessness Agreement', pg 234, 2022.

¹⁴ Op cit 9, pg 51.

recently moved to a community housing managed property from a public housing property, which meant that he became eligible for rent assistance. Joe provided authority to the community housing provider to deduct his rent from both his income support payment and from the new rent assistance. An office error where the rent assistance was not deducted led to the accrual of the arrears – this was out of Joe’s control.

Not only was Joe confused and distressed to discover the rent arrears, the provider then issued a Notice to Vacate over the accrued arrears, rather than work with Joe to explain what had happened and find a solution – which would have been the approach in a public housing tenancy.

In this context, it is appropriate to ensure that Government funding for public housing is at least equal to the actual amount of support received by community housing providers. The Plan should find a mechanism to do that.

How will the community view shelter in the future?

Nationwide, the community is obsessed with property.

For decades, Australians have been encouraged to look to residential property as a mechanism for wealth creation. In 2016 research firm CoreLogic estimated that around 27 per cent of Australia’s dwellings were owned by an investor.¹⁵

The introduction and maintenance of federal taxation policies such as capital gains tax discounts and negative gearing have contributed to a perception that owning an investment property is a get out of jail free card for the risks involved with other types of investment and is completely insulated from any negative outcomes.

As a result, we have seen rents increase in line with interest rates, as owners have sought to pass the pain on to renters, rather than weather the ebbs of their investment decision personally.

The Plan should consider opportunities to correct existing community views about the relationship between private landlords and the people who live in their investments.

Best practice social housing tenancy management

The Plan is an opportunity for Australian Governments to set bold and ambitious goals for the wellbeing of us all. Regarding social housing tenancy management, and in some instances, tenancy management overall, the Plan should aim high in setting goals for jurisdictions to work towards.

- i. No evictions into homelessness

The Road Home’s white paper correctly identified:

¹⁵ CoreLogic, ‘Investor Report: June 2016’, https://soundproperty.com.au/wp-content/uploads/2018/01/CoreLogic-Investor-Report_June-2016.pdf, accessed 14 September 2023, pg 4, 2016.

“Social housing and boarding houses currently offer a ‘last resort’ housing services and as a result, people who are evicted from these tenures are very likely to become homeless and cycle through the human service and justice systems. Each year several thousand tenants leave social housing and seek crisis accommodation. This is disruptive and traumatic for tenants and their children and inefficient for government.”¹⁶

This issue remains today. One recommendation of The Road Home was that “state and territory governments were to implement a policy of ‘no exits into homelessness’ from statutory, custodial care and hospital, mental health and drug and alcohol services.”¹⁷

While these policies have helped in Victoria, the overall lack of social housing stock has also made it difficult to achieve.

Issues with negative, or ‘push’ exits from social housing continue to drive greater inequities, and trap Australians into traumatic cycles of homelessness.

The Victorian Social Housing Regulatory Review’s Interim Report included a proposal that ‘no evictions into homelessness policy be further explored, where tenancy issues would seek to be resolved via other means.’¹⁸

These experiences are not limited to Victoria.

A key part of delivering best practice social housing tenancy management is ensuring that tenancies are sustainable. A ‘no evictions into homelessness’ policy drives on earlier policy reforms in this space and would lead to better renter outcomes, as well as directly resulting in fewer people churning through the specialist homelessness services systems.

ii. Well resourced staffing

A key issue for many years has been the lack of capacity within local housing offices to respond to renter requests in a timely manner. This has substantial flow through effects for the experiences of renters, and Government or Provider ability to act as a best practice landlord.

The VPTA is aware that across both social tenure types, frontline workers are often managing in excess of 100 tenancies, and in public housing in particular, it is not unusual for a single staff member to manage an entire high rise apartment building’s worth of tenancies, in excess of 300.

Delivering strong and sustainable social housing tenancies relies upon the rapport built between the tenancy manager and the household.

At these levels, rapport building is impossible.

¹⁶ Australian Government. ‘The Road Home’, pg 25.

¹⁷ Ibid, 27.

¹⁸ Social Housing Regulatory Review Panel, ‘Social Housing in Victoria: Interim Report’, 2021, pg 28.

iii. Security of Tenure

As discussed elsewhere, security of tenure is a core tenet of security. The Plan should ensure that security of tenure in all kinds of social housing is central to system design and policy making.

The most secure tenure type across the board is home ownership. The Johnson paper outlines how public housing, in effect, a tenancy for life, offers the next best security of tenure.¹⁹ It is security of tenure that drives successful social housing tenancy outcomes.

Often a social housing tenancy is a person's first experience of a secure and affordable home that truly feels safe and 'theirs' in many years, if ever. Understandably, maintaining that property and their position in this new community is of utmost importance.

Policies referred to in the Issues Paper which repeat income eligibility checks as a mechanism to 'move people on' from public housing²⁰ are therefore counterproductive.

The VPTA is conscious that some people who live in social housing have been able to fully capitalise on the opportunity that a safe, affordable place to call home provides, and may be in a position to transition to the private rental market.

This should be supported and encouraged by social housing providers where it is the stated wish of a resident, but it should never be enforced as mandatory, as this would undercut the principle of security of tenure.

The Australian Housing and Urban Research Institute have considered the issue of a 'throughput policy model' which seeks to move people out of social housing and into the private rental market, and say:

"This throughput policy model is radically different to the ethos underpinning the social housing system historically, where social housing was often a lifetime stable housing solution for lower incomes workers...For many interviewees, it was inappropriate to apply a throughput pathways model. Instead of offering transitional tenure, social housing provided residential stability and security to people who had never had this before and who are often facing complex health and other wellbeing issues...

Our research also finds that policies based on this approach are inconsistent with the realities available to people to traverse housing pathways. A throughput pathway assumes upward social mobility supported by employment progression. However, as affordable housing has become increasingly unavailable, labour market attachment more tenuous for more households and access to social housing more restrictive, a pathway out is increasingly unlikely. Firstly, a paucity of affordable housing means there is nowhere to move to, and secondly, there is a need for ongoing tenancy

¹⁹ Op cit 4.

²⁰ Commonwealth of Australia (Department of Social Services), National Housing and Homelessness Plan Issues Paper, pf 46.

support. We see this confirmed in the number of people who transition in and out of social housing on multiple occasions and in the proportion of people who leave social housing for precarious housing situations.

Tenants and providers participating in this research were both aware that obtaining secure, long-term, affordable and appropriate housing in the private rental market was unobtainable by people on income support payments and living in poverty, and both inaccessible and financially and emotionally damaging for people vulnerable to discrimination or stigma.”²¹

In short, attempting to force people out of public housing to manage an unavailability of stock in this way puts people further behind.

Instead, people who live in social housing should feel empowered to move into the private rental market at a time that is right for them.

iv. Affordability defined and guaranteed

Given the growing proportion of all social housing stock that is now managed by community housing providers, the Plan should consider defining affordability for social housing renters, and setting a national cap on the proportion of household rent that can be charged as subsidised rent.

Despite surface level similarities, there can be substantial differences between the actual proportion of household income charged as rent. While this is often explained as resulting from community housing renters' eligibility for the Commonwealth Rent Assistance compared to public housing renters, this is not always the case. A comparison of the rent calculation used by Victoria's Department of Families, Fairness and Housing and some common calculation methods used by Victorian community housing providers at figure 2 shows this to be true. These base methods do not take into account differences in which income support payments that providers consider to be assessable or non-assessable. For example, the Department of Families, Fairness and Housing does not include the Pension Supplement in its list of assessable income, although the VPTA understands that many community housing providers do.

²¹ Australian Housing and Urban Research Institute, Inquiry into understanding and reimagining social housing pathways, Final Report, 2020, pg 51.

Figure 2. DFFH rebated rent calculation methods compared with popular community housing rent calculation methods

DFFH rebated rent calculation per fortnight	Community Housing fortnightly rent calculation A	Community Housing fortnightly rent calculation B
25% of assessable household income	25% of all household incomes	30% of household income
+	+	+
15% of any child related payments	15% of child related payments	15% of child related payments
	+	+
	100% CRA	100% CRA

Figure 3 (at page 16 of this submission) shows how these examples would affect the household budget of a variety of households.

These inconsistencies should be limited, and an overall cap of household income that a social housing provider can charge as rent should be applied in the Plan.

- v. Prompt, high-quality maintenance

The Issues Paper correctly identifies:

“Poor quality housing negatively impacts tenants’ health, safety and ability to participate in society. However, an increasing number of social housing tenants are living in dwellings that do not meet the agreed minimum acceptable standards.”²²

The Plan should ensure jurisdictions both grow social housing stock (including publicly owned and managed stock and stock managed by the Aboriginal Community Controlled sector), as well as ensure existing stock is well maintained.

Minimum standards for all residential rental properties should be introduced that use Victoria’s existing minimum standards as a starting point.

The VPTA notes that there are opportunities to strengthen these minimum standards, in particular in relation to the requirement for properties to have both heating and air conditioning. Currently, only heating is a minimum requirement.

The minimum standards should also be strengthened with regard to draught proofing.

The Plan has a key role to play in both generating new investment in stock, and maintaining Australia’s existing investments in social housing stock. This will become more and more critical as our communities adapt to climate change and renters are more affected by extreme heat and natural disasters.

²² Commonwealth of Australia (Department of Social Services), ‘National Housing and Homelessness Plan Issues Paper’, pg 49.

This is particularly the case given people who live in social housing and low income private rental households are highly correlated with households where elderly people, young children, or people with disability or chronic ill health live – that is those who are more susceptible to heat related illness.

vi. Renters at the centre of decision making

As part of the Big Housing Build, the Victorian Government commissioned an independent Social Housing Regulatory Review. As part of the Terms of Reference for this Review, the Panel considered best practise social housing tenancy management and how best to place renters at the centre of decision making on issues that affect their own lives.

At the time of writing the Victorian Government is yet to release the final report of this review. Notwithstanding, the Interim Report included a number of positive recommendations which were well-received by the sector as a whole.

The Plan's drafting process should consider this report and implementing some of the key recommendations.

Resourcing the community sector to help people stay housed

Many issues can place a tenancy at risk – and at their core, they are not always housing related.

Periods of mental ill health, addiction illness, chronic illness, and experiences of trauma can all impair an individual's capacity to maintain their tenancy.

When this happens, help must be available when and where the person needs it, so that issues do not escalate to a point where tenancies are placed at risk.

The Plan must recognise the centrality and inter-related nature of housing issues and ensure that the community sector as a whole is resourced to respond to need promptly and sensitively.

This broader availability of supports will assist in the shift towards Housing First service delivery and prevent tenancies from being placed at risk.

Response to Productivity Commission Report, 'In Need of Repair'

The Issues Paper summarises a concern raised in the Productivity Commission's report from their evaluation of the existing National Housing and Homelessness Agreement, 'In Need of Repair'. Notably that there is a "difference [in the] levels of subsidy are available to households in social housing and those in the private rental market, notwithstanding similar socio-demographic status."²³

The Productivity Commission argues that Rent Assistance should therefore be made portable across the private rental and social housing sectors, with all participants paying a market rate.²⁴ The VPTA strenuously disagrees with this proposal for a number of reasons:

- Market rent is inherently unaffordable, and even with the provision of a much more generous rental assistance, would remain so for a large number of the people this reform is targeted to assist.
- Directing investment and support into increases to Commonwealth Rent Assistance would have the effect of further inflating private market rents, and would effectively increase inequality as private landlords would be a key second-round beneficiary of the reform. Further, it is highly likely that private landlords would simply increase the market rents by a corresponding amount, negating any practical benefit to renters in the long term.
- Equivalent public investment directed towards growth in social housing stock would keep these funds public and provide a wider social benefit to the Australian community by lessening demand in the private rental market overall.

Whilst it is correct that there are those in the private rental market that are eligible for public housing and therefore not accessing as much assistance as others in similar circumstances, the VPTA considers this is emblematic of broader social and economic inequalities, and not a fault in design of social housing systems. This issue has been exacerbated through runaway costs in the private rental market, decades of chronic underinvestment in social housing as a tenure type overall and stubbornly low-income support payments which trap Australians in poverty.

An additional payment to property investors, by way of their tenants, is not a real solution to these issues.

²³ Commonwealth of Australia (Department of Social Services), 'National Housing and Homelessness Plan Issues Paper', pg 49.

²⁴ Productivity Commission, 'In Need of Repair', 2022, pg 254.

Recommended directions for the new National Plan

The Plan should aim to deliver Housing First with sufficient homes and sufficient wrap around support. Social housing homes should be managed in accordance with best practice principles, guided by the work of Victoria's Independent Social Housing Regulatory Review.

The Plan must also countenance the future of Australia's housing market and shifting entrenched community viewpoints about the role of shelter in our economic system, compared with shelter as an inherent human right.

Specifically, the VPTA makes the following recommendations:

1. Be ambitious – set strong targets for growth in public housing stock and for the continual reduction and elimination of experiences of homelessness in Australia.
2. The National Plan should directly connect to other Government Plans, and vice versa, to ensure that housing and homelessness support is considered holistically rather than in an emergency.
3. Create equity in Federal funding support for public and community housing.
4. Consider the use of Federal levers or incentives to influence best practice social housing tenancy management in States and Territories, including:
 - a. Introducing 'no evictions into homelessness' policies;
 - b. Guarantees of security of tenure;
 - c. Well-resourced frontline tenancy teams to implement social landlord principles;
 - d. A clear definition of affordability and greater consistency in rent setting across public and community housing providers;
 - e. Introducing programs and strategies which allow social housing renters to be at the centre of decision-making about their homes.
5. Ensure the community sector is adequately resourced to help aid reduction and prevention of homelessness as well as provide greater supports for tenancy sustainment across all rental tenures.

Conclusion

Thank you for providing an opportunity to give feedback on the Issues Paper. The VPTA looks forward to engaging with Government on future opportunities during the drafting process of the Plan.

Figure 3 – Effects on household budgets of Public Housing and Community Housing rent calculations

Household	Fortnightly income	Public Housing Rent Calculation	Total proportion of fortnightly income paid in Public Housing	Fortnightly Community Housing Rent Calculation (method A)	Method A total proportion of income paid	Fortnightly Community Housing rent calculation (method B)	Method B total proportion of income paid	Difference per fortnight excluding CRA
Single parent with 4 year old child	PPS: 942.40 ES: 14.10 PS: 27.80 FTB A: \$213.36 FTB B: \$181.44 Total: \$1,379.10	25% of base payment, less pension supplement and energy supplement + 15% of FTB A and B. 239.13 + 59.22 = \$298.35	21.6%	30% of base payment including pension supplement + 15% of FTB A and B, plus 100% of CRA. 295.29 + 59.22 + \$217.28 = \$571.79	35.6%	25% of base payment including pension supplement + 15% of FTB A and B, plus 100% of CRA. 246.08 + 59.22 + 217.28 = \$522.58	32.7%	Method A: \$354.51 Method B: \$305.30 Household is up to \$56.16 better off per fortnight in public housing
Young person receiving Youth Allowance as an independent	YA: \$602.80 ES: 8.80 Total: \$611.60	25% of base payments = \$152.90 per fortnight	25%	\$183.48 + \$184.80 = \$368.20	46%	152.90 + 184.80 = 337.70	42%	Method A: \$183.48 Method A: \$152.90 Up to \$30.58 p/f better off in public housing

Household	Fortnightly income	Public Housing Rent Calculation	Total proportion of fortnightly income paid in Public Housing	Fortnightly Community Housing Rent Calculation (method A)	Method A total proportion of income paid	Fortnightly Community Housing rent calculation (method B)	Method B total proportion of income paid	Difference per fortnight excluding CRA
Single person receiving Disability Support Pension	DSP: \$1002.50 ES: 14.10 PS: 80.10 Total: \$1,096.70	250.63 + 3.3 = \$253.93	23%	300.75 + 4.22 + 24.02 + 184.80 = \$513.79	40.1%	250.63 + 3.3 + 20.03 + 184.80 = \$458.76	35.8%	Method A: \$328.99 Method B: \$273.96 Up to \$75 p/f better off in public housing.
Single, 45 year old unemployed person	JS: \$749.20 ES: 8.80 Total: \$758	187.30 + 2.2 = \$189.50	25%	224.76 + 2.64 + 184.80 = \$412.20	43.7%	187.30 + 2.2 + 184.80 = \$374.30	39.7%	Method A: \$227.40 Method B: \$189.50 Up to \$37.90 better off p/f in public housing
Single parent with a 15 year old child	JS: \$802.50 ES: \$9.50 FTB A: \$277.48 FTB B: \$126.56 Total: \$1,216.04	200.63 + 2.38 + 41.62 + 18.98 = \$263.61	21.7%	240.75 + 2.85 + 41.62 + 18.98 + 217.28 = \$521.48	36.38%	200.63 + 2.38 + 41.62 + 18.98 + 217.28 = \$480.89	33.6%	Method A: \$304.20 Method B: \$263.61 Up to \$40.59 better off p/f in public housing

