

The NRSCH Review  
Housing Policy Branch  
Welfare and Housing Reform Group  
Department of Social Services  
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Canberra ACT 2601

Via: NRSCHreview@facss.nsw.gov.au

*Monday, 1st April 2019*

Attention: National Regulatory System for Community Housing (NRSCH) Review Working Group

**Submission in response to the NRSCH Discussion Paper**

Homelessness NSW welcomes the opportunity to provide comment on the NRSCH Discussion Paper.

As you may be aware, Homelessness NSW is a peak, not-for-profit organisation that works with its members to prevent and reduce homelessness across New South Wales (NSW). Our members are Specialist Homelessness Services (SHSs). These include small, locally based community organisations, multiservice agencies with a regional reach and large State-wide service providers all of which provide services and support to people at risk of or experiencing homelessness.

This submission responds specifically to consultation questions seven and 19 from the discussion paper, as these questions are of particular relevance to our members. We have not commented on the full range of consultation questions.

- *Question 7: Are there existing forms of regulation that overlap with the NRSCH (e.g. the ACNC)? What is the impact of this? What should community housing regulation offer that is not covered by existing schemes?*

Homelessness NSW considers that any review of the NRSCH needs to take account of the broader regulatory environment and the role and purpose of the NRSCH needs to be more specifically identified within the context of this environment. This means understanding the NRSCH's role with respect to the full range of housing providers, including public housing providers and should also include understanding the role of the ACNC and ASIC, as well as other forms of quality accreditation and regulation in service delivery areas such as disability and homelessness. It also means understanding the interactions between the NRSCH and other regulatory schemes, to enhance co-ordination with other schemes and eliminate any duplication and conflicting obligations.

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Consideration of the broader regulatory environment should include the NRSCH taking account of homelessness sector accreditation requirements. In April 2018, the NSW Department of Family and Community Services (FACS) decided to adopt the Australian Service Excellence Standards (ASES) accreditation certificate for all SHS providers in NSW. However, a minority of SHS providers are also registered as Tier 3 providers under the NRSCH. This means that a dual system of accreditation/regulation will apply to this group of SHS providers if the NRSCH continues to apply to them. Homelessness NSW considers that a dual system of accreditation/regulation should not apply and that, of the two systems, ASES accreditation is more suitable for SHS providers.

The ASES is a set of standards and national quality improvement program that aims to assist non-government organisations to improve their business systems, management practices and service delivery. The ASES will be implemented across the SHS sector over the next few years, with all FACS-funded SHS providers to be accredited against these standards by 30 June 2023.

Unlike community housing providers (CHPs), SHS providers do not generally manage social housing. They are more concerned with supporting tenants than with managing housing assets. The ASES accreditation system, which will apply to all SHS providers, will be designed to reflect this focus on reducing homelessness and assisting tenants. In contrast, the NRSCH, being designed to regulate providers that manage social and affordable housing, understandably, has a strong asset management focus. Therefore, Homelessness NSW considers that ASES accreditation will be better tailored to regulating SHS providers than the NRSCH.

While some SHS providers with Tier 3 NRSCH registration may be CHPs as well as SHS providers, this is not the case for all Tier 3-registered SHSs. It is unclear why SHSs, which are not CHPs, are eligible for registration under the NRSCH. This may be because, at the time of registering, there was no alternative and more suitable accreditation system. However, once the ASES accreditation system for SHSs is fully in place, Homelessness NSW believes that SHS providers should not be eligible for registration under the NRSCH. This will ensure that only one coherent and consistent form of accreditation applies to SHS providers.

Although Homelessness NSW favours the removal of SHS providers from the NRSCH regulatory framework, this will not remove the need for the NRSCH to collaborate with the regulatory scheme that applies to SHS providers. For example, if a particular housing asset has become unsafe for tenants, the CHP managing the asset and the SHS managing service delivery to the tenants need a collaborative process for responding to this issue. This collaborative process should be embedded in the separate regulatory schemes applying to CHPs and SHSs. Homelessness NSW expects that the need to ensure collaboration between regulatory systems will apply in relation to a range of existing regulatory schemes.

- *Question 19: How has the NRSCH affected tenant outcomes? Have tenant outcomes improved?*

Homelessness NSW believes that the NRSCH requires an increased focus on tenant outcomes to improve public accountability for best practice in CHP tenancy management. This increased focus on tenant outcomes should include monitoring tenant exits from housing and enabling greater tenant involvement in the design and oversight of the NRSCH.

The NRSCH should also consider the diversity of tenants – including tenants from Aboriginal and Culturally and Linguistically Diverse (CALD) communities and those with support needs – to ensure that regulation and monitoring of tenant outcomes understands how service provision is tailored and appropriate for these different tenant groups.

*Conclusion*

We would be pleased to discuss any aspect of our submission. Please contact me on 02 8354 7605.

Regards,



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CEO  
Homelessness NSW