

Shelter WA.

Submission to the Service Priority Review

About Shelter WA

Our vision

Accessible, affordable, appropriate and secure housing and working towards the elimination of homelessness in Western Australia.

Shelter WA was founded in 1979 as an independent, community based peak body committed to accessible, affordable and secure housing for Western Australians, and to working towards the elimination of homelessness in WA. Shelter WA believes housing is a basic human right. Safe, secure and affordable housing is a fundamental determinant of health and a key requirement for people to engage in work, maintain healthy relationships and fully contribute to society. Shelter WA advocates for policy settings and responses that facilitate appropriate affordable housing options for low to moderate income earners, for those who are otherwise disadvantaged in the housing market or experiencing homelessness. This is done by strong collaboration with the not-for-profit housing and social services sector, government, industry bodies, business, the community and research institutions.

Shelter WA is a member of the National Shelter Council and a member of the Council to Homeless Persons Australia and has a seat on the Board of Homelessness Australia. This national membership strengthens Shelter WA's capacity to represent Western Australia's interests through participation in research, policy advocacy and engagement in national debate.

Shelter WA is predominantly funded by the Western Australian Housing Authority and is appreciative of this support.

How we can assist

Shelter WA is in the position to act as a conduit for consultation with the non-government sector in relation to affordable and social housing and homelessness issues.

Contact

For further information regarding this submission please contact Michelle Mackenzie, Manager Policy on 9325 6660 or email strategy@shelterwa.org.au.

Definitions used in this submission

Social housing includes public housing properties managed by the State Government and community housing properties either owned by the Community Housing Provider, or, by the State and managed by a Provider. 'Housing stress' refers to housing that costs more than 30% of a household's income, specifically for households in the lowest 40% of income distribution. This is known as the 30/40 rule. 'Affordable housing' refers to housing which is affordable for low income households and for which they are paying less than 30% of their income.

Social and Affordable Housing, Tenancy Support and Homelessness

Introduction

Shelter WA submits that:

- housing has the potential and capacity to be a key driver to major cross portfolio reform and potential savings for the Western Australian government;
- the housing portfolio and WA government 'land bank' is a multi-billion-dollar asset that could be better optimised in the whole of government approach to housing and human services;
- the housing system is ready for major reform;
- there is an opportunity to facilitate private and institutional investment into affordable and social housing;
- there is an opportunity for significant savings to government through co-ordination and investment by agencies in implementing up-front solutions, rather than focusing on managing problems; and
- this will require strong leadership to implement reforms across some major systems of government.

Research shows the opportunity for government to maximise investment in social housing and homelessness services driven by:

- An approach that focuses on maintaining and sustaining tenancies, focusing on the individual needs of the person or family first;
- Aligned departmental policies and KPIs to provide housing and end homelessness;
- Planning reform to support affordable and social housing growth;
- Government working in partnership with the development industry;
- Inter-departmental cooperation and alignment of policies and KPIs to end homelessness; and
- Harnessing the expertise of the NGO sector through outsourcing and partnerships.

The benefits of secure, safe and affordable housing chosen by the individual and augmented with suitable health and community supports as required are well documented. They include:

- Improved health status, maintenance of symptom stability and overall functioning reducing demand for treatment and care;
- Improved sense of belonging and self-worth;
- Improved social and economic participation;
- Reduced reliance on welfare support and reduced impact on homelessness services; and
- Cost savings in the areas of crisis, police and ambulance call outs, emergency departments and hospital admission.

Shelter WA's Response to the Terms of Reference have a specific focus on the following points:

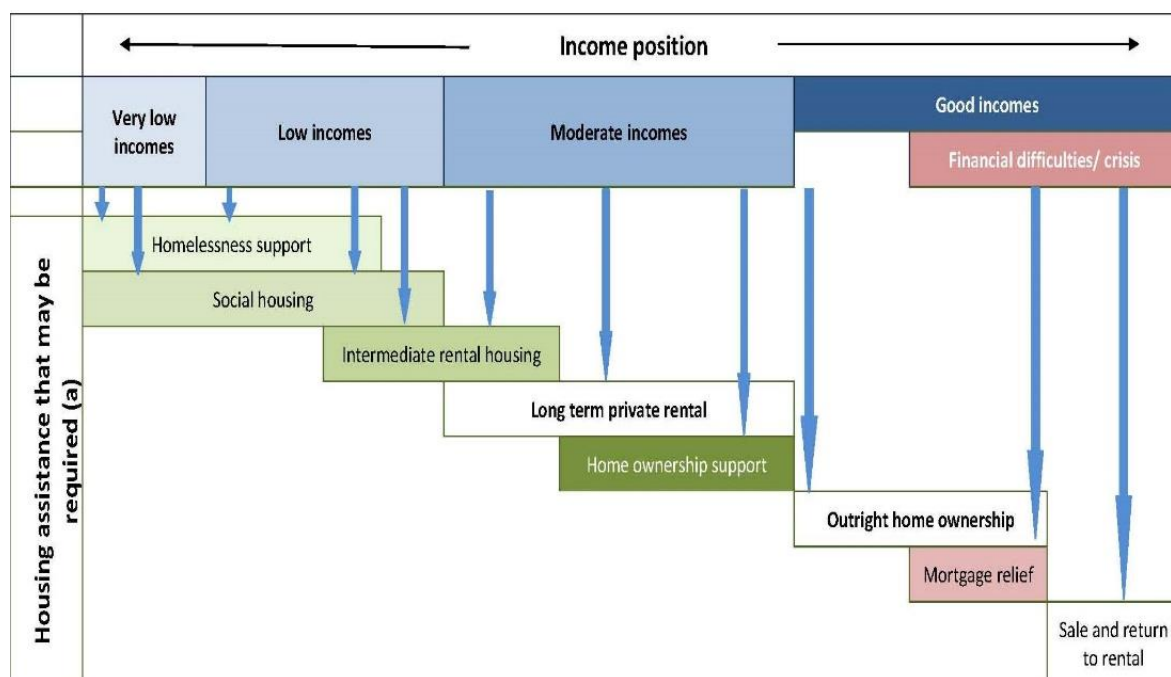
- Point 2. Promoting a culture of collaboration in the achievement of outcomes for the community;
- Point 3. Promoting public service innovation that delivers transformative public policy and service delivery that is different, better and lower cost;
- Point 5. Identifying opportunities to deliver Government services, programs, projects and other initiatives more efficiently or effectively, including through a whole-of-government digital strategy, or to no longer be delivered; and

- Point 6. Developing and implementing whole of sector key performance indicators to ensure more effective delivery of services to the community and support for economic activity and job creation.

The Shelter WA Housing Hub contains examples of best practice partnerships between government, the private and non-government sector to deliver co-ordinated, cost effective affordable and social housing solutions. These are located at <http://wahousinghub.org.au/display/RES/Research+Home>.

Conceptual framework: Housing assistance matched to people’s need

The housing continuum refers to a range of accommodation and housing options which matches housing assistance to people’s needs. This ranges from emergency shelters and supportive housing for vulnerable populations, through to transitional and social housing, private rental housing and home ownership. Matching assistance to people’s housing needs is important to support stable tenancies and ensure everybody has an affordable place to call home.



a) This diagram is intended to show the types of housing assistance that may be required by people depending on their income. Not all people on each income level will require support.

The opportunity cost to the individual, society and government of housing and homelessness

Housing insecurity remains an issue for many Western Australians. With 18,530 people on the public housing wait list, only 3% of private rentals affordable to people on low incomes, and 9,600 people experiencing homelessness every night, housing affordability and homelessness remain a key public policy issue for two key reasons: the effects that housing unaffordability has on the economy, society and individuals; and the failure of the market to correct these issues in a timely and efficient manner.

Inefficient housing markets have widespread and lasting impact on economic productivity and the broader community. Access to appropriate, affordable housing is fundamental to economic growth and productivity and is a critical foundation for individual and community prosperity and wellbeing. Adequate housing is a fundamental determinant of health. Without shelter it becomes impossible for individuals and families to overcome broader social disadvantage by engaging in appropriate services.

Investment in social and affordable housing leads to increased productivity, unlocks opportunity, and establishes a platform for efficient government service delivery. Whilst housing provides shelter, it influences a raft of non-shelter outcomes for individual households, such as workforce participation, access to jobs and services, family stability and educational attainment. The costs of poor housing choices are not just borne by the individual, but by society¹. AHURI research indicates that access to housing can affect health and education, and therefore labour market productivity².

Research points to preventable generational homelessness in that children who first experience homelessness at a young age are significantly more likely to experience persistent homelessness in adulthood³. Early intervention can prevent the cost of an ongoing cycle of homelessness. This is true of other vulnerable groups for whom investment in housing and service supports makes economic and social sense. For example, research indicates that access to appropriate, stable and affordable accommodation with appropriate levels of support geared to individual needs is of critical importance to assist people with mental illness to maintain successful housing outcomes⁴.

Adequate and crisis and transitional accommodation for young people, adults and families and domestic violence accommodation is critical.

Planning reform: Whole of government approach to facilitate affordable housing

Proposed changes to the Strata Titles Act (1985) to facilitate a wider range of tenure options are positive, and should support the development of more diverse and affordable housing stock. Priority needs to be given to planning reform which optimises land allocation for social and affordable housing through the implementation of inclusionary zoning for all significant developments.

Initiatives should include but not be confined to:

- Ensure that State and local government planning policies, frameworks and strategies support appropriate and sufficient social and affordable housing in all regions;
- All government land and housing developments that meet relevant criteria, include a minimum of 15% affordable housing targeted at low-to-moderate income households;
- Inclusionary zoning to apply to all significant scale private developments. The level of social and affordable housing to be provided through this mechanism must only be set after a thorough market feasibility is conducted;
- Undertake a comprehensive audit of State and local government land assets with the view to unlocking under-utilised land for social and affordable housing, potentially on peppercorn rents and long-term leases; and
- Embed innovative housing design practices, products and building materials based on suitability and energy efficient principles to reduce ongoing housing operational costs.

No expenditure is required to put this measure in place; however, there may be a minimal impact on the budget in terms of foregone revenue due to caveats on the sale of State assets to include the requirement for 15% affordable housing over extended time periods. The benefits to the State far outweigh the minimal loss in returns from asset sales, by increasing the amount of affordable housing.

In addition, the State should continue the availability of targeted affordable home ownership products such as shared equity, home loan products and mortgage relief to assist with affordable home ownership. Also, continue initiatives such as rental brokerage to assist people in social housing transition to the private rental market. The transitional housing program is a positive example of this.

In Western Australia, most fixed-term agreements are for six or 12 months, although they can be for anytime. Further consideration could be given to longer (ie five and 10-year) rental lease options to provide for greater stability and security of renters. For example, In Britain, a “build to rent” concept has emerged, where buildings constructed solely for rental accommodation are owned by a single institution. The British government established a private rented sector taskforce overseeing a £1 billion (\$1.7bn) build to rent fund, which allowed for what was essentially a bridging loan repayable after the homes were built and rented out.

Government, non-government and industry coordination of Housing and Homelessness Data

The Housing Industry Forecasting Group is a positive example of a joint industry and government body providing independent commentary on the housing sector in WA with collaboration between the Department of Planning and Housing.

A sound evidence base is needed for housing and homelessness policy. The service priority review should consider what data needs to be captured by agencies to inform a stronger evidence base, and develop strong data linkages between State Government agencies, the non-government sector and industry to inform policy and program development.

Focussing on solutions not problems – maximising government investment

Strategic whole of government response to Homelessness

Research indicates that millions of government dollars would be saved annually in health and mental health services, police, justice and prison services by providing social housing and supporting people to maintain and sustain tenancies. Policy settings that deliver affordable housing and government investment in well-designed social housing, with appropriate wrap around services, significantly reduces the costs to government of health and justice services, as well as community support services⁵. AHURI research on the costs incurred by government in health and justice services shows that these are substantially greater than the costs of providing housing and support programs for people experiencing homelessness⁶. A comprehensive Homelessness Strategy which enables the development of integrated, seamless service models that improve long-term outcomes for people experiencing homelessness and ensures service providers have contract periods that support service and workforce sustainability will address this.

Mental Health and Criminal Justice

- The cost of accommodating people with a mental illness in Graylands is approximately \$265,000 per annum (or 3 people per million dollars). It is understood a Mental Health Commission (MHC) paper identified the cost for 112 inpatients over 4 years is approximately \$120 million.
- Aboriginal and Torres Strait Islander peoples with mental and cognitive disabilities are significantly over-represented in Australian criminal justice systems⁷.
- Lifecourse institutional costs of homelessness for vulnerable groups are massive. A 2012 Study from a cohort of 2,731 people who have been in prison in NSW and whose MHDCD diagnoses are known. The Lifecourse institutional costs for 11 case studies, aged between 23 and 55, range from around \$900,000 to \$5.5 million each.⁸

Savings to Prisons:

\$60,400 saving per person per year through social housing and support services:

- *\$128,400 per year to house a person in prison compared to;*
 - *\$65,000 per year to provide social housing and support services.*
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- There are significant savings to be made by a carefully developing housing and accommodation strategy that is linked to the implementation of the Better Choices. Better Lives. Western Australian Mental Health, Alcohol and Other Drug Services Plan 2015–2025.⁹

Maximise government investment in social housing

Growth of the Community Housing Sector

In 2015/16, there were 18,530 applicants on the public housing wait list, including 2,283 with a priority need, and an average wait-turn allocation time of 153 weeks¹⁰. The extent of demand is likely to exceed these published figures as Western Australia maintains the lowest income eligibility of any jurisdiction¹¹.

In Western Australia, 80 per cent of social and public housing is owned and managed by the Housing Authority; with 20 per cent owned or managed by approximately 200 Community Housing Providers (CHPs)¹².

The Productivity Commission's *Report on Government Services 2014*, identified that Western Australia has the highest cost per public housing dwelling of all the mainland States¹³. Despite ongoing State Government investment, supply does not meet demand.

Stock transfer of social housing to community housing providers, whether titled or management only, with leveraging commitments, has been identified as a key State Government lever to stimulate investment in social and affordable housing¹⁴. AHURI research indicates that asset or title transfers will maximise the scope for community housing innovation and entrepreneurialism¹⁵.

Research indicates that growth of the community housing sector will facilitate greater economies of scale, enabling providers to attract private finance, and deliver efficiencies in stock provision, management and tenant support. Also, evidence indicates there are better outcomes for tenants as community housing tenants are generally more satisfied in relation to their housing arrangements than public housing tenants¹⁶. This was reinforced by the Productivity Commission which highlights that community housing providers often outperform public providers on some indicators including tenant satisfaction and property maintenance.¹⁷ There is a critical need for a community housing growth strategy, with targets for long-term management and/or title transfers, developed in partnership with the sector.

Using the Community Housing sector to maximise Commonwealth funding opportunities

The 2017/18 Commonwealth budget outlined initiatives to deliver more affordable and social housing. New Federal funding commitments such as:

- A National Housing Finance and Investment Corporation¹⁸ will:

Savings to Health:

\$16M annual saving to the Western Australian health system by providing stable public housing for people experiencing, or at risk of homelessness:

- *\$13,273 saving per person per year for those supported on NPAH;*
 - *\$84,135 saving per person per year saving for NPAH mental health program recipients;*
 - *19.5% decrease in the proportion of people accessing hospital emergency department;*
 - *24.7% decrease in overnight hospital stays;*
 - *6-day reduction in length of hospital stays;*
 - *57.8% decrease in proportion of people accessing psychiatric care; and*
 - *8.4-day reduction in average length of psychiatric care stay.*
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- explore and develop a ‘bond aggregator’ to de-risk access to capital by community housing organisations; and
- Invest \$1 billion over 5 years to support local governments to finance critical infrastructure such as transport links, power and water infrastructure and site remediation works.
- \$10.2 million to trial the use of Social Impact Investments aimed at improving housing and welfare outcomes for young people at risk of homelessness.
- An additional 10 per cent CGT discount to resident individuals investing in qualifying affordable housing managed through a registered Community Housing Provider.
- New rules that enable Managed Investment Trusts (MITs) to acquire, construct or redevelop property to hold for affordable housing.

Continue to harness National Rental Affordability Scheme (NRAS) opportunities. NRAS, a Federal Government initiative that, through partnerships, significantly increases supply of new affordable rental housing. NRAS allows eligible people on low to moderate incomes the opportunity to rent homes at a rate that is at least 20% less than market value rent. NRAS homes are not social housing - they are affordable rental homes owned by private investors or NFP companies¹⁹.

A strategy for ongoing collaboration between the State Government and the non-government housing sector will provide greater clarity to enable the sector to plan, invest, partner and innovate. This strategy needs to consider the benefits of large-scale stock transfers (with or without title), with clearly stated, measurable objectives, to ensure the additional social housing required to meet demand is developed and available to those in greatest need.

Transfer of management to community housing providers is a key lever to stimulate social and affordable housing investment.

To maximise this strategy, it should be underpinned by the right planning frameworks, maximise underutilised government land and ensure that the mix of dwellings provided are diverse to meet the needs of the whole community.

Strategic approach to tenancy management

The lack of co-ordination between government agencies due to competing policy imperatives, different discourses and staff disciplines and professional approaches means that different departments are managing issues with inadequate coordination/collaboration which results in sub optimal outcomes and higher costs. For example, the intersection of the Housing, Department of Child Protection and Family Services and the Health and Mental Health disciplines when it comes to how they approach people experiencing homelessness.

The Housing Authority’s Tenancy Management practices is an example:

- Some families face eviction from public housing due to ‘disruptive behaviour’ or damage and ‘property standards’ arising from circumstances of domestic violence or serious mental illness;
- due to the lack of appropriate practices in response to domestic violence and mental illness, children are at high risk of being evicted from public housing;
- the Housing Authority could improve policy or practices to identify cases involving domestic violence or mental illness;
- where the Housing Authority does identify domestic violence or serious mental illness, in many cases the Authority still proceeds to Court to seek eviction, rather than engaging effectively

with the community or government services to provide appropriate supports to sustain a tenancy;

Systemic solutions include an approach that focuses on maintaining and sustaining tenancies, focusing on the individual needs of the person or family and aligned departmental policies and KPIs to provide housing and end homelessness. Skilled staff, along with the legal and systems capacity, are required to enable this to occur. Immediate and longer-term solutions are outlined as follows. That the Housing Authority enhances existing or implements new actions to:

Targeted intervention for people requiring tenancy support improves outcomes for the individual and reduces cost to Government.

- identify and intervene before a situation deteriorates to the point where an eviction may have to be progressed;
- work in partnership with other areas of government such as the Mental Health and Disability Services Commissions and the Department for Child Protection and Family Support, (to ensure the needs of specific cohorts are considered) and the community housing and the social services sector, to co-design a shared assessment framework and joint waitlist. This could determine the tenants for whom the public housing system and its current level of support is appropriate and which individuals require more targeted support. This targeted, integrated housing support system will identify and facilitate the provision of specialist support to transition into and stabilise tenancies. It will provide a more coordinated and integrated model that supports long term stable housing outcomes;
- reinstate Regional Managers' discretion to work with tenant advocates to seek practical resolutions for the underlying issues in a tenancy;
- not proceed with a termination application or eviction where the DCPFS advises that they are working with the family and that the current housing is important for the children's protection and care, and similarly where the DCPFS advises that they have not previously engaged with the family and have not identified child protection concerns, but would be concerned that eviction would put the children at risk;
- adopt policies and train staff to be able to identify domestic violence cases and mental health, and to then screen these matters into a 'support track' rather than an 'evictions track' working in partnership with the NGO sector;
- reduce the high rate and cost of litigation by introduction of practical approaches and collaboration with DCPFS and the non-government sector to sustain tenancies;
- utilize termination applications as a last resort, after referral to support services:
 - attempts at collaborative work with community services;
 - if an eviction must progress, it must not be evicting into homelessness; and
 - an analysis of 'whole of government cost' demonstrates that the eviction is in the public interest. This analysis requires consideration of the likely impact on the community of the tenant and family being evicted from public housing.
- Stop the use of without grounds terminations, demonstrating that the termination is justified in accordance with the tests under s75A or s71 of the *Residential Tenancies Act 1987 (WA)*

Tenancy advocates have called on staff from the Department of Child Protection and Family Services and school principals to give evidence to oppose termination applications by the Housing Authority in the Magistrates Court and won.

- Pilot new approach by diverting funding of the Disruptive Behaviour Management Unit.

Unlike other Australian states, Western Australia does not have a specialist Tribunal to deal with tenancy disputes under the RTA²⁰. The Magistrates Court of Western Australia has exclusive jurisdiction to deal with any matter under the RTA for a claim less than \$10 000 (a ‘prescribed dispute’)²¹. Regardless of the professed informality of the Magistrates Court, research indicates that there are essentially no advantages to not having a tribunal, whilst there are several disadvantages including:

- Magistrates have no specialized knowledge of residential tenancies law;
- The physical spectre of the ‘court’ detracts from the informality of proceedings; and
- The court has a large workload and high turnover of cases²².

Both owners and tenants in the Department of Commerce Review contended that a Tribunal would enable experts in residential tenancy matters to effectively adjudicate disputes and promote a more conciliatory approach to dispute resolution, and both groups suggested that tenants would be more likely to attend a tribunal than a formal court²³. Tenant advocates and community housing providers continue to raise concerns with tenancy matters being heard at the Magistrates Courts. Concerns include the delays for final hearings and the quality of conciliation at pre-trial hearings which impacts on the quality of the outcomes achieved.

Since the 2008 Review of the *Residential Tenancies Act 1987 (WA)*, the State Administrative Tribunal has been established. The feasibility of moving tenancy disputes to an independent residential tenancies tribunal or the State Administrative Tribunal should be investigated to determine if this remains a better and more cost-effective alternative to the current dispute resolution system.

Conclusion

Shelter WA has provided evidence that:

- housing has the potential and capacity to be a key driver to major cross portfolio reform and potential savings for the Western Australian government;
- the housing portfolio and WA government ‘land bank’ is a multi-billion-dollar asset that could be better optimised in the whole of government approach to housing and human services;
- the housing system is ready for major reform;

Policy Implications:

- *The atomised and singular manner in which people with complex compounded needs are addressed by most agencies is extremely costly and counterproductive.*

- *Early holistic support is crucial for disadvantaged children with cognitive disabilities and/or mental health disorders who are homeless or in unstable housing.*

- *Provision of skilled disability supported accommodation and education early in life would save significant spending on homelessness and criminal justice interventions later in life.*

- *System incentives to cost-shift should be eliminated.*

- *A significant change in the way government human service agencies approach a small but extremely costly group of persons is required. Evidence suggests that robust, holistic, cross portfolio support and intervention responses fit for purpose (e.g. appropriate and adequate disability support with housing) are needed.*

- there is an opportunity to facilitate private and institutional investment into affordable and social housing;
- there is an opportunity for significant savings to government through co-ordination and investment by agencies in implementing up-front solutions, rather than focusing on managing problems; and
- this will require strong leadership to implement reforms across some major systems of government.

The benefits of secure, safe and affordable housing chosen by the individual and augmented with suitable health and community supports as required are well documented. They include:

- improved health status, maintenance of symptom stability and overall functioning reducing demand for treatment and care;
- improved sense of belonging and self-worth;
- improved social and economic participation;
- reduced reliance on welfare support and reduced impact on homelessness services; and
- a significant reduction in hospitalisation. Housing is a better predictor of reduced hospital admission than clinical interventions. This delivers cost savings in the areas of crisis, police and ambulance call outs, emergency departments and hospital admission.

References

- 1 Yates, K., Milligan, V. (2007) *Housing Affordability: A 21st Century Problem*, AHUR Final Report no. 105, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/final-reports/105>. page 6
- 2 MacLennan, D., Ong, R. and Wood, G. (2016) *Housing, productivity and economic development*, AHURI Research and Policy Bulletin No. 212, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/research-and-policy-bulletins/212>., page 1
- 3 McKenzie, D, Flatau, P, Steen, A., Thielking, M. (2016) The Cost of Youth Homelessness in Australia – Final Report Swinburne University Institute for Social Research, the University of Western Australia and Charles Sturt University, in partnership with The Salvation Army, Mission Australia and Anglicare Canberra & Goulburn.
- 4 Western Australia. Mental Health Commission, *Mental Health 2020: Making it personal and everybody's business*, p 20. Surveys estimate that in Western Australia, 43 percent of people in specialised mental health hospital beds could be discharged if housing and/or other appropriate supported accommodation services were available. Mental healthcare service costs for people experiencing homelessness dropped from \$US40,451 to \$US24,170 per housing unit per year when those experiencing mental illness were given permanent shelter, offsetting 94% of the costs of providing them with the housing in the first place. page 20
- 5 Wood, L., Flatau, P., Zaretsky, K., Foster, S., Vallesi, S. and Miscenko, D. (2016) What are the health, social and economic benefits of providing public housing and support to formerly homeless people?, AHURI Final Report No. 265, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/final-reports/265>, doi:10.18408/ahuri-8202801. page 2
- 6 Flatau, P., Zaretsky, K., Brady, M., Haigh, Y., Martin, R. (2008) The cost-effectiveness of homelessness programs: a first assessment, AHURI Final Report No. 119, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/final-reports/119>. page 143
- 7 Baldry, E., McCausland, R., Dowse, L. and McEntyre, E. 2015 A predictable and preventable path: Aboriginal people with mental and cognitive disabilities in the criminal justice system. UNSW, Sydney. <https://www.mhdcd.unsw.edu.au/>
- 8 Baldry, E., McCausland, R., Dowse, L. and Clarence, M. 2012 Lifecourse institutional costs of homelessness for vulnerable groups. UNSW, Sydney.
- 9 Western Australian Mental Health Commission (2015). Better Choices. Better Lives. Western Australian Mental Health, Alcohol and Other Drug Services Plan 2015–2025. Perth, Western Australian Mental Health Commission.
- 10 Western Australia. Housing Authority. (2016) *Annual Report 2015-16*, page 22
- 11 Income limit: \$430 per week for a single with no children and \$540 for people with a disability. Productivity Commission (2016) Table 17A.62. Single Aged Pension: \$434 including pension supplement and energy supplement. Department of Human Services (2016) Age Pension
- 12 Community Housing Coalition, (2015) *Doing more with what we already have*. page 3; This includes social housing for low income earners, affordable housing for people whose incomes do not fall within public housing income and asset eligibility limits along with crises/short term and transitional accommodation for people who are homeless or at risk of being homeless
- 13 Op Cit, page 6
- 14 Op Cit, page 4
- 15 Pawson, H., Milligan, V., Wiesel, I. and Hulse, K. (2015) *Public stock transfers to community housing the best option for a sustainable and financially supportable housing system*, AHURI Research and Policy Bulletin No. 184, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/research-and-policy-bulletins/184>. Public stock transfers to community housing the best option for a sustainable and financial supportable housing system, AHURI, February 2015, page 1.
- 16 Australian Institute of Health and Welfare, National Social Housing Survey: State and Territory Results 2010, AIHW, Canberra 2012, page 15
- 17 Australian Government. Productivity Commission (2016) Human Services: Identifying sectors for reform, Preliminary Findings Report, page 75
- 18 https://www.ahuri.edu.au/__data/assets/pdf_file/0014/3047/AHURI_RAP_Issue_174_Enhancing-affordable-rental-housing-investment-via-an-intermediary-and-guarantee.pdf

¹⁹ NRAS homes are located where affordable rental accommodation is most needed, especially in areas where employment, schools and other services are available nearby. NRAS properties can remain in the National Rental Affordability Scheme for up to 10 years (provided they continue to meet eligibility requirements). NRAS rental homes are available to eligible low to moderate income earners.

²⁰ Queensland, Northern Territory and Western Australia are the three jurisdictions which do not have a specialized Tribunal to deal with disputes under their Residential Tenancies Acts.

²¹ Residential Tenancies Act, 1987 (WA) Section 12

²² Bradbrook, A J, Poverty and the Residential Landlord and Tenant Relationship (1975) AGPS, Canberra, Ch 1, Sackville, R, Law and Poverty in Australia (1975) AGPS, Canberra, ch3.

²³ Western Australia, Department of Commerce, Policy Report, *Review of the Residential Tenancies Act 1987 (WA)*, January 2008, page 168