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NATIONAL COUNCIL *good works*

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Submission to the Senate Standing Committees  
on Economics

***Inquiry into Treasury Laws Amendment  
(National Housing and Homelessness  
Agreement) Bill 2017 [Provisions]***

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## Introduction

Housing and homelessness policy in Australia is at a critical juncture. Housing stress has reached historical highs, there is a severe shortage of social housing, and a growing number of low-income households are priced out of the private rental market.<sup>1</sup> Against this backdrop, the development of a new National Housing and Homelessness Agreement (NHHA) is timely. This new agreement is scheduled to commence on 1 July 2018, and will replace the existing National Affordable Housing Agreement (NAHA) and the National Partnership Agreement on Homelessness (NPAH).

Under the new NHHA proposed by the Federal Government, funding will be provided to state and territory governments in accordance with a primary housing agreement, a supplementary housing agreement, or a designated housing agreement. The Federal Government has proposed that funding be made conditional on several factors, including states and territories having ‘credible’ housing and homelessness strategies. Although the criteria for a ‘credible’ strategy remains unclear, the Commonwealth Government will be empowered to withhold funding if prescribed accountability measures are not achieved.<sup>2</sup>

The St Vincent de Paul Society National Council (the Society) welcomes the opportunity to respond to these proposed new arrangements, which are enshrined in the *Treasury Laws Amendment (National Housing and Homelessness Agreement) Bill 2017* (the Bill).

We believe the development of a new agreement has the potential to provide the national leadership and coordination necessary for all levels of government to work together to improve housing affordability and reduce homelessness. Such an agreement should guarantee stability and adequacy of funding for housing and homelessness programs, draw on the evidence of what works, and provide the governance frameworks needed to drive reforms and coordinate efforts across different jurisdictions and policy domains. We also support the stated objective of strengthening transparency and accountability in the way funding for housing and homelessness is used.

Despite the potential of this new national agreement, we do not believe the current Bill provides the foundation for a more coordinated and coherent national approach to tackling housing unaffordability and homelessness. The proposed legislative framework carries a number of risks and flaws, and requires significant revision.

A fundamental shortcoming is the lack of a national housing and homelessness strategy and plan, with responsibility for meeting housing and homelessness targets shared across jurisdictions and levels of government. Related to this is the failure to delineate the roles and responsibilities of different levels of government within the Bill, including the policy responsibilities of the Commonwealth and the governance and institutional arrangements required for a coordinated and sustainable approach.

In addition, the Bill does not guarantee adequacy and certainty of funding, and it carries the risk of a funding gap if the narrow timeframe for negotiating agreements with state and territory governments is not met. Greater investment in social housing is essential if the NHHA is to meet its “overarching objective” of ensuring that “all Australians have access to affordable, safe and sustainable housing that contributes to social and economic participation”.<sup>2</sup> Currently, the agreement does not reflect the actual costs of maintaining and operating a social housing system, let alone supporting a growth in social housing commensurate to need. This funding shortfall is

compounded by the expanded scope of the agreement, which encompasses additional affordable housing objectives while maintaining existing levels of funding. Further difficulties stem from the flawed method of distributing funding and the failure to clearly specify the amount of funding quarantined for homelessness services and programs.

An additional problem is that the Bill makes funding conditional on imprecisely defined criteria. While we support greater transparency and accountability, the trigger to withdraw funding undermines a genuinely collaborative and cross-jurisdictional approach, while at the same time threatening the viability of front-line services and critical housing programs. This punitive approach risks creating a scenario of continuous funding instability and political friction, undermining any strategic long-term effort in addressing housing and homelessness. Further, we do not believe the Bill puts in place the necessary accountability and transparency mechanisms, including centralised data collection, evaluation and reporting mechanisms. We believe an independent body should be established to monitor and assess performance under the new agreement, to aggregate and assess data on housing supply and demand, and to strengthen the evidence base for decision making by all levels of government.

Finally, the Society remains deeply concerned about governments' neglect of Indigenous housing and the failure to develop a national agreement in consultation with Aboriginal and Torres Strait Islander peoples. We believe any credible strategy to reduce homelessness and overcome housing unaffordability must attend to the needs of Aboriginal and Torres Strait Islander peoples, including a recommitment to Indigenous-controlled and culturally appropriate service models. Despite this, the Bill does not incorporate any objectives relating to Indigenous housing outcomes, nor is it linked to a stand-alone Indigenous Housing Strategy. We note with concern that the Federal Government has not committed to funding the National Partnership on Remote Housing beyond June 2018, and there continues to be a lack of representative forums to enable policy engagement by Indigenous stakeholders.

Despite these concerns, the Society remains hopeful that a durable, comprehensive and coordinated national agreement can be developed. How this new national agreement is designed is of paramount importance, and it is imperative that we resolve the problems identified in the current Bill and get the legislative underpinnings right.

## **Who we are**

The St Vincent de Paul Society (the Society) is a respected lay Catholic charitable organisation operating in 149 countries around the world. Our work in Australia covers every state and territory, and is carried out by more than 64,000 members, volunteers, and employees. Our people are deeply committed to social assistance and social justice, and our mission is to provide help for those who are marginalised by structures of exclusion and injustice. Our programs assist millions of people each year, including people living with mental illness, people who are homeless and insecurely housed, migrants and refugees, women and children fleeing violence from men, and people experiencing poverty.

## Response to Bill

The Society has long called for reforms to intergovernmental funding arrangements in relation to housing and homelessness. We acknowledge the current Bill incorporates some positive elements, and we welcome the Government's stated commitment to funding certainty for both housing and homelessness services, particularly given the persistent funding uncertainty that characterised the soon-to-expire National Partnership Agreement on Homelessness (NPAH). We also commend the move to index funding for homelessness services, and support the aim of strengthening accountability and transparency in the way funds are used.

Despite these positive directions, we remain concerned about key elements of the Bill, as elaborated upon below.

### The need for a national housing and homelessness strategy and plan

The NHHA provides an ideal vehicle to draw all jurisdictions together in a constructive dialogue around a national housing and homelessness strategy and plan. Despite this, the Bill is not linked to any national strategy or plan, nor does it place any obligation on the Commonwealth to develop a housing or homelessness strategy that incorporates policy levers at the Federal level.

The need for a national strategy is clear and compelling. A lack of policy coordination and coherence among the three levels of government, and between agencies at each level, has contributed to the fragmentation of policy and to a failure to address the complex issues that are behind Australia's housing supply and affordability issues. The interaction of policy and regulatory decisions across all levels of government affect the affordability and quality of housing and the nature and extent of homelessness. Housing outcomes are driven by demand and supply factors, and control over the levers that affect these is split between different levels of government. As a result, effective action by one level of government is often contingent on clarity and certainty about what the other levels of government are doing.<sup>3</sup> This mutual interdependence means that both the vision and the policy response to achieve it need to be developed jointly with all levels of government.

Achieving this joint approach requires a clear delineation of the roles and responsibilities of different levels of government, including the Commonwealth. In addition to providing the leadership needed for a long-term and cooperative national approach, the Commonwealth has responsibility for some of the most critical drivers of housing outcomes, including macro-economic policy, taxation, social security policy, assistance to home owners, industry policy, immigration settings, regional development and national infrastructure policy. The significant impact of 'non-housing' national policy settings – together with the complexity and scale of challenges mounting in our housing system and their significance to Australia's economic, social and fiscal outlook – make national leadership essential. More broadly, many of the 'priority' outcomes that the Federal Government has linked to NHHA funding could only be achieved with Commonwealth Government policy leadership.<sup>4</sup>

Accordingly, addressing housing and homelessness issues cannot be made the sole responsibility of state and territory governments. An agreement that places the onus on state and territory governments to achieve outcomes, without factoring in the contribution of policy settings at the Commonwealth level, will impede a truly effective, coordinated and coherent approach.

Thus, if the NHHA is to overcome the policy fragmentation and incoherence that beset the NAHA, it is critical that it draws together different levels of government through a national strategy and plan. This is needed not only because national policy levers are so critical to the performance of the housing system, but because specific initiatives designed to improve housing affordability and reduce homelessness will require a consistent and assertive national approach to have sufficient impact. The Bill should clearly delineate the roles and responsibilities of respective levels of government, including the role of Commonwealth and its attendant policy responsibilities and obligations.

**Recommendations:**

**The NHHA legislation should specify the Commonwealth's obligation to develop a national housing and homelessness strategy and plan, to help define and complement state and territory plans, and to foster a comprehensive and coordinated cross-jurisdictional approach to housing affordability and homelessness prevention. This should include clearly setting out the system-level principles, roles and responsibilities, and overarching objectives that will guide the structure of the new housing and homelessness agreement and its implementation.**

**As part of a national strategy and plan, the Bill should require the Commonwealth to commit to policy actions and targets within its remit, including macro-economic policy, taxation and income support, assistance to home owners, industry policy and regulation, data collection and analysis, and national infrastructure policy.**

## **Strengthening governance and institutional arrangements**

It is imperative governance and institutional arrangements are strengthened to support intergovernmental coordination and to improve the accountability and effectiveness of policies and programs funded under the NHHA.

Over the past decade, governance of housing policy has become increasingly fragmented, inconsistent and uncertain in Australia. Given Australia's federated structure, a coordinated and sustainable approach to housing affordability requires strong and stable intergovernmental and stakeholder commitment. However, we currently lack the institutional architecture necessary to foster coordination between governments and the various portfolios responsible for housing policy levers. Progress under the NAHA has been stymied by inadequate governance – the dismantling of intergovernmental fora, the lack of a dedicated housing minister at the Commonwealth level, the residualisation of housing policy to the welfare portfolio or line agencies, and the absence of a 'loop' to feed evaluations back into decision-making.<sup>5</sup>

A recent report examining Australia's multi-level governance arrangements found housing policy development and implementation is dispersed and uncoordinated across and within levels of government, undermining accountability and leading to policy fragmentation and politicisation:

We lack a systematic way of coordinating all the policy settings at those different levels of our governance system in a way that can work coherently and with coordination towards social objectives that we as an overall society might have set. That means not only that our policy architecture is weak and fragmented but also that it is interfacing with quite a complex economic system around the supply of housing.<sup>5</sup>

At the intergovernmental level, the capacity to coordinate efforts across state and federal jurisdictions was weakened in 2013 when the COAG Ministerial Council on Housing was disbanded.

Ministers can, and still do, meet in special circumstances, but not as part of a regular or ongoing decision-making forum. Without institutionalised mechanisms to ensure regular meetings and agreement on key matters, reforms have stagnated. Related cross-jurisdictional forums, such as the Housing Ministers' Advisory Committee, have met intermittently or not at all.<sup>6</sup> Given this lack of interjurisdictional forums, we believe that re-establishing a COAG Ministerial Council on Housing and Homelessness is crucial to support the NHHA.

Policy capability within national and state and territory bureaucracies is also limited. Both the causes and consequences of the current housing crisis are multi-dimensional and complex. Thus, while the policy levers affecting housing and homelessness cross portfolio boundaries, the state of the housing market also has wide-ranging social and economic ramifications, affecting employment, productivity, inequality, educational and health outcomes, and macroeconomic stability. Despite the undeniable importance of housing and its cross-portfolio dimensions, there has been a trend in both federal and state and territory governments to relegate housing to the welfare portfolio, thereby limiting the scope of policy expertise and the capacity for an integrated and coordinated approach to policy making and implementation.<sup>5</sup> As a 2011 review of housing policy capability within the Commonwealth public service concluded, "the devaluing and narrowing of the Commonwealth's interest in this field has had a severe long term impact on housing policy capacity in the public service, with policy knowledge and conceptualisation, breadth of policy expertise and delivery being identified as key gaps in its ability to provide policy advice and support to decision-makers on housing issues".<sup>7</sup>

At a national level, the abolition of the National Housing Supply Council (NHSC) has contributed to the demise of policy capability and evidence-based policy development and oversight. Prior to its abolition in 2013, the NHSC provided specialist advice and information to governments, including housing supply and demand estimates, projections and analysis. It also investigated the influence of wider policy settings such as infrastructure investment, housing-related taxation and urban planning. When the Government announced it would dissolve the NHSC, it claimed that specialist housing policy advice would be provided by the relevant COAG Ministerial Council and Commonwealth departments. However, the Ministerial Council on Housing and Homelessness was disbanded one month after the abolition of the NHSC, and a 2015 Senate Inquiry into affordable housing found that the NHSC's functions were not subsequently absorbed into Treasury.<sup>3</sup> Treasury officials have themselves conceded that, with the NHSC disbanded, "there is no vehicle through which [Treasury] would then have responsibility to assist the government" in relation to policy advice on housing supply.<sup>3</sup> The lack of policy capacity and focus was subsequently confirmed by the Federal Finance Minister himself, who conceded that Treasury does not compile any data on the housing supply gap on the basis that such data and analysis is provided by various industry groups, and that "[h]ousing Supply is predominantly an issue for the states and territories".<sup>8</sup> Five years after the NHSC was disbanded, the overriding need for comprehensive policy analysis and regular and authoritative information on housing demand and supply remains unmet.

The lack of sufficient policy capacity to support the NHHA was further underlined in the most recent Mid-Year Economic Fiscal Outlook (MYEFO) statement, with the Federal Government revoking the

\$6.5 million that had been allocated to the National Competition Council to monitor the effectiveness of the NHHA.<sup>9,\*</sup>

In addition to undermining the scope for an integrated and evidence-based approach, the lack of an independent agency analysing housing supply and demand will make it difficult for jurisdictions to design ‘credible strategies’ to meet projected housing demand, particularly in relation to affordable housing for people on low incomes. The absence of an agency equipped with this forecasting and monitoring capacity will also limit the Commonwealth’s capacity to assess the credibility of the strategies proposed by state and territory governments. The lack of robust and independent policy advice and analysis also leaves governments more susceptible to policy capture from well-resourced industry lobbying.<sup>10</sup>

We believe it is critical the NHHA Bill reinstates an independent agency to provide specialised policy advice and information to inform the NHHA. Such a body should support ongoing policy development and oversight, and help hold states and territories to account under the NHHA. We believe such an agency is necessary to meet the Government’s stated objective of improving accountability and transparency, as discussed further below.

The national leadership required to support the NHHA is also hampered by the lack of a dedicated homelessness and housing minister at the Commonwealth level. Housing and homelessness are not simply adjuncts of welfare policy – they are shaped by social, economic, taxation, employment, education and health policies. Given the significance and complexity of housing issues, a dedicated housing and homelessness minister is vital to provide political leadership and drive policy coordination across portfolios.

**Recommendations:**

**To improve the coordination, accountability and effectiveness of policies and programs implemented under the NHHA, the Bill should include provisions to strengthen governance and institutional arrangements. This includes:**

- **establishing an independent agency to provide specialised policy advice and information to inform decision-making across all levels of government, and to monitor, analyse and report on housing and homelessness indicators across jurisdictions; and,**
- **reinstating a Ministerial Council on Housing and Homelessness within the Council of Australian Governments.**

**A dedicated housing and homelessness minister at cabinet level should also be appointed, with the housing portfolio located either within one of the central coordinating departments (e.g. Treasury or Prime Minister and Cabinet) or as a separate department with formal links to these central departments and other relevant portfolios.**

\* When announcing the new NHHA during the 2017 Federal Budget, the Government committed \$6.5 million to the National Competition Council to “to assist with the implementation and ongoing assessment of State and Territory performance”. This funding was revoked in the subsequent Mid-Year Economic and Fiscal Outlook, with the Government stating that the “Department of the Treasury will now assist with the implementation and ongoing assessment of performance under the National Housing and Homelessness Agreement, from *within existing resources*” [emphasis added].



## Ensuring accountability and transparency

We acknowledge there is a pressing need to strengthen accountability and transparency in the new national agreement. Under the direct grant systems established under the NAHA, the states and territories were not required to provide their full accounts to the Commonwealth, and the associated performance-based accounting and reporting arrangements have been described as thin and loose, lacking body and contestable.<sup>11</sup> The Society believes the reporting mechanisms associated with NHHA funding should be more robust and transparent, producing accurate and meaningful data on how money is being spent and the results, and ensuring mutual accountability across different levels of government.

Despite the Government's stated objective of strengthened accountability, the current Bill does not provide the mechanisms and means to realise this objective. According to the Federal Treasurer, state and territory governments misused the NAHA special purpose payment as a "one-way ATM" that lacked accountability and failed to boost supply.<sup>12</sup> To overcome this, the Government proposes that funding under the NHHA be made conditional on states and territories meeting a range of requirements, including having a 'credible' housing and homelessness strategy, providing relevant data to the Commonwealth, and matching a portion of homelessness funding received from the Commonwealth.

There are a number of problems with these proposed arrangements. First, the trigger for withdrawing funding introduces an unacceptable degree of uncertainty and risk to critical front-line services and programs. Whereas the NAHA guaranteed ongoing funding, the new agreement enables funding to be terminated on vaguely defined terms. While it is reasonable to expect state and territory governments will accept certain obligations, the means deployed to hold them to account needs to take into consideration the impact on communities, particularly those who are the most vulnerable and disadvantaged. A situation in which funding for essential services and supports is perpetually uncertain and subject to political negotiations is disruptive and damaging to services, making it difficult to retain staff or engage in long-term planning. It also undermines the policy stability and continuity that is necessary to facilitate institutional investment in social housing. Moreover, terminating funding would jeopardise essential front-line services and programs, with devastating impacts on the social housing system and on housing and homelessness outcomes. Should funding to states and territories for housing and homelessness services be cut, the 394,300 Australian households who currently reside in social housing would be put at risk of homelessness, and services to the 288,000 Australians who access specialist homelessness support in a year would be dramatically reduced.<sup>13,14</sup>

Such concerns are heightened by the lack of specificity of criteria for withdrawing funds. For example, the main condition for the receipt of funds is that states and territories have strategies that are credible, as determined by the relevant Commonwealth minister. The Bill, however, provides no indication of what constitutes a credible strategy, and the ambiguous and loose wording of section 15C of the Bill permits a wide scope for interpretation. This confers considerable power to the Commonwealth to terminate funding on arbitrary grounds. It also increases the likelihood of the politicisation of funding decisions, blame-shifting, intergovernmental disputes, and bilateral agreements based on political bargains and ad hoc arrangements which are unrelated to national policy objectives.

Such an approach undermines the prospects of developing long-term cross-jurisdictional and cross-party commitment. The conditional and punitive terms that are proposed are not conducive to the strategic, constructive and cooperative approach that is so urgently needed to tackle housing unaffordability and reduce homelessness. Funding agreements that involve the Commonwealth using its fiscal strength to dictate the conduct of policy are counterproductive and unlikely to deliver “lasting and systematic benefits”.<sup>15,16</sup> As Adrian Kay notes in his analysis of governance in Australia’s federated political structure, “it is the capacity to influence and persuade rather than command and control that is central in bringing about problem-solving as the dominant mode of interaction”.<sup>17</sup>

Further, the Bill enables the Commonwealth to evade responsibility for housing and homelessness outcomes, placing the onus solely on state and territory governments. We believe the new agreement should ensure *mutual* accountability across levels of government, with reporting requirements extending to both state and federal government spending and outcomes. Making funding to states and territories contingent on housing outcomes that are also strongly influenced by Commonwealth policies is clearly problematic. A more complete picture, and greater accountability for government expenditure and policy outcomes, would be gained by assessing and reporting not only the performance of state and territory governments, but also the contribution of Federal policies and investments (such as Commonwealth Rent Assistance, housing-related tax expenditures/discounts, national infrastructure investments, etc). This comparative and multi-level analysis would be consistent with “COAG’s intention to outline transparently the contribution of both levels of government to achieving benchmarks and to achieving continuous improvements against the outcomes, outputs and performance indicators”.<sup>18</sup>

Finally, the need for stronger accountability and transparency adds further weight to the case for establishing an independent agency to monitor and oversee implementation of the NHHA. Numerous reviews and inquiries have affirmed the importance of assigning monitoring and reporting functions for joint government agreements to an independent body.<sup>3,15,19,20</sup> Accountability relies on robust and reliable data and meaningful performance measures. In the context of this national agreement, it also requires a whole-of-government approach to data collection, management and evaluation. However, the way in which the current agreement is framed, and the lack of an independent agency to support data collection and analysis, risks leading to a fragmented and inconsistent approach to data collection and analysis.

A crucial preliminary step to measure progress towards housing and homelessness outcomes involves identifying the data required for that purpose. This is not straightforward and requires expert input and consultation with different levels of government and with community and industry stakeholders. The data collected must be of sufficient quality and comparability to enable changes over time to be reliably measured. It must also be feasible to collect, without imposing an unrealistic administrative burden. In this regard, one of the problems of the NPAH and NAHA is not that no performance data has been collected and reported, but rather that performance frameworks were poorly conceived, with limited alignment between outcomes and indicators, and concepts that have been difficult to accurately measure or operationalise into performance indicators.<sup>21,22</sup> There are also significant gaps in the available data collections. For example, there is no current evidence base that shows transparently and consistently what the social housing system in each state and territory

costs, and how these costs are met.<sup>\*23</sup> Nor is there effective linkage of existing data sets, such as homelessness data with housing, human services and Centrelink data, which could in turn provide valuable insights into the influence and effectiveness of policy interventions for different population cohorts. A further difficulty is the degree of variation across jurisdictions in relation to service models, focus of effort and the comparability of performance reporting. The patchy, inconsistent and fragmented state of housing-related data ultimately undermines accountability, prevents effective analysis, and is barrier to continuous improvement. It appears the current NHHA Bill, which lacks an overarching and unifying framework and relies upon strategies and performance reporting from each jurisdiction, will merely perpetuate such problems.

A further concern relates to the reliability of data, and the need for an independent agency to verify the accuracy of information reported by state and territory governments. Under the NAHA and NPAH, there were significant deficiencies in the accuracy and sophistication of the data available. A persistent concern raised in audits of NPAH by state and territory Auditors-General has been the accuracy of reported information within their respective jurisdictions, in part due to data collection limitations and definitional matters.<sup>22,24,25,26,27,28,29</sup> A further problem stems from the difficulties in abstracting the effects of specific policies and programs from wider social and economic factors.<sup>†</sup> It is important data is not simply produced to create the impression that certain outcomes are being met, or to circumvent a deeper analysis of the various factors contributing to housing outcomes. Assessing the reliability and implications of data is, we believe, a role best undertaken by an independent agency with the requisite policy and analytical expertise.

To assess the effectiveness of policies and programs, it is not enough to merely collect and report on data. Understanding the context in which specific housing outcomes are achieved, and the relative contribution of different policies and external factors, is vital. This is useful to establish why some performance targets may have been met, while others were not, identifying those factors that support good performance and those that have the opposite effect.<sup>15</sup> In this regard, the implementation and ongoing monitoring of the NHHA would benefit from the designation of an independent agency to evaluate policies and programs, analyse specific indicators and outcomes in terms of the wider context, and synthesise information from a range of sources into an overall judgement of success.

In sum, the provisions in this Bill belie the Government's stated commitment to stronger accountability and transparency. On the one hand, the introduction of a trigger for withdrawing funding will not guarantee accountability and is counterproductive, not only exposing critical frontline services and the social housing market to perennial uncertainty and risk, but also undermining the prospects for a durable intergovernmental approach based on cooperation and mutual accountability. On the other hand, the Bill fails to establish a framework to support accountability and transparency, including the establishment of an independent body to support data collection, analysis and reporting. The Government's recent decision to axe funding to "assist

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<sup>\*</sup> For example, the Report on Government Services purports to show the "net recurrent cost per dwelling" for each state and territory. However, while the annual collation of this data is administratively costly, the statistics are widely considered as serving little purpose, and fail to differentiate between distinct expenditure components such as management and maintenance.

<sup>†</sup> For example, planning policies may achieve their stated objectives in isolation from other housing-related outcomes, but may result in other, unanticipated outcomes, such as inflating house prices, spill-over effects on surrounding housing markets (e.g., increased construction or price), or increasing the shortfall in housing affordable to those on low incomes.

with the implementation and ongoing assessment of State and Territory performance under the new national Housing and Homelessness Agreement” only adds to doubts about the Federal Government’s commitment to genuine accountability and transparency.<sup>9</sup>

**Recommendations:**

**Measures to support accountability should focus on improving performance, rather than imposing financial penalties that would cripple services and contribute to uncertainty and instability in the social housing system.**

**The Bill should include the establishment of an independent agency to support ongoing monitoring, analysis and reporting on progress across jurisdictions and levels of government. This agency should:**

- **undertake an audit of existing data sets, to identify gaps, areas for improvements and opportunities to leverage existing data collections;**
- **oversee the development of a reporting and evaluation framework for the NHHA (including new performance indicators and nationally consistent data collection guidelines) in consultation with the Commonwealth and state and territory governments and the non-government sector; and**
- **provide comprehensive and regular public reporting on key indicators of housing supply and demand, and related social and economic indicators, in order to support ongoing assessment and refinement of policies.**

**The NHHA Bill should include an evaluation requirement, and a percentage of funding should be allocated accordingly to enhance understanding of the effectiveness of different approaches.**

## **Increased funding and adequate indexation**

Fundamental to any effective national agreement is a funding framework that provides adequate and ongoing resources commensurate with stated policy objectives and operational circumstances. We do not believe the NHHA, as it currently framed, satisfies this requirement. While the 2017 Federal Budget maintained current funding levels with indexation, it did not commit to any growth funding, despite the demonstrable need for additional investment. Nor did the Government commit to indexation that reflects increases in the costs of service provision and population growth. This shortfall in funding is compounded by the widened scope of the new agreement, along with problems in the way funds are distributed to different jurisdictions.

## **Social housing**

According to the Federal Government, the decline in the number of public housing dwellings is evidence of the NAHA’s “abject failure”. As stated by the Assistant Treasurer Michael Sukkar:

We believe it’s crucial that every dollar of spending on affordable housing programs increases the number and availability of public and social housing stock. Clearly, this objective has not been met.<sup>30</sup>

However, a viable social housing system cannot be achieved without significant and recurring capital investment. Over the past three decades, Commonwealth investment in social housing has declined substantially, resulting in a backlog of need, lengthy waiting lists, deteriorating housing stock, and rolling financial losses among state housing authorities. This funding deficit has sent the social

housing system into a downward spiral, with state and territory housing authorities selling off public housing stock to cover ongoing operational losses. The subsequent reduction in public housing dwellings has meant the remaining stock has become even more targeted to those with high needs and limited capacity to pay, thereby reducing net rental income. At the same time, as the public housing portfolio has aged and the incidence of tenant vulnerability has increased, management and maintenance costs have escalated, further reducing the operational and financial viability of the public housing system. The result has been ever-longer waiting lists, poor quality dwellings, and rolling financial losses among state and territory housing authorities.

If the NHHA is to succeed, it must reverse this decline and address the funding gap in the social housing system. Given the vertical fiscal imbalance of Australia's federal system of government, state and territory governments cannot bridge the funding gap alone and require a substantial contribution from the Commonwealth. Nor can private finance or an aggregated bond financing model *replace* public investment. While private sector financing can complement public investment, it requires a durable government subsidy that covers the difference between operational costs and the revenue from rent that low-income tenants can afford. Private financing initiatives are not sufficient to bridge the funding deficit in the social housing system, and they will generate limited leverage if they are targeted to lower income households.<sup>31</sup> Without additional government investment, any increase in stock is unlikely to be sustained and will be directed at the affordable rather than the social end of the subsidised housing spectrum.<sup>31</sup>

The new agreement, therefore, will not be effective unless it delivers a funding boost to the social housing system. Without significant investment from the Commonwealth, the NHHA will ultimately fail to deliver the objectives stated in the Bill. To support this investment, we believe funding should support a capital or growth fund dedicated to the development of new housing stock for people on low incomes, as well as funding for the maintenance of existing social housing stock.

### Scope of agreement

A fundamental concern raised by the Bill is the broadening of outcomes, without the allocation of additional funding from the Commonwealth. Under the NAHA, funding is primarily used for the provision of social housing targeted to the low-income households, and for delivery of homelessness services. The Bill indicates that the scope of the NHHA will be broadened to include housing affordability in the wider residential market. This could include providing affordable housing for people with incomes too high for public housing, in addition to low-cost homeownership products.<sup>2</sup> The Commonwealth has not committed any additional funding to achieve these broader outcomes.

In a context where there is already a severe shortfall in funding for social housing and homelessness services, the additional outcomes proposed under the new agreement could only be achieved by redirecting funding away from social housing and homelessness programs. This would compound the pressures on an already under-resourced and overstretched service system, leading to poorer outcomes for the most vulnerable households and those experiencing homelessness.

### Homelessness services and programs

We welcome the Government's decision to roll the NPAH into the new agreement, together with the requirement for matched funding from state and territory governments. The funding arrangements proposed in the Bill, however, do not guarantee the adequacy of funding for homelessness services. The Bill does not separately identify the funding which was included in the NAHA, and it is unclear

whether the requirement for matched funding from the states and territories will only apply to the additional homelessness component rolled into the new agreement, or whether it will also apply to homelessness funding included in the core NAHA funding in 2009. It is critical these funding ambiguities are clarified, and that funding allocated for homelessness services is discretely identified and quarantined to ensure funds are not diverted to other program areas.

### **Distribution of funding**

To ensure the NHHA creates a more sustainable and equitable funding regime, the model for distributing funds to the states and territories should be reviewed. Key to this is a method for distributing funds that reflects the size and actual costs of maintaining and growing the social housing stock in different jurisdictions.

Under the NAHA, funding has been allocated on a per capita basis, and not according to the level of need or the number of public housing dwellings in each of the jurisdictions. This funding formula overlooks jurisdictional variations, with some states and territories having substantially larger social housing portfolios in relation to their overall population. In addition, the costs of growing and maintaining dwellings varies significantly between different states and regions. There are, for example, substantial variations in costs between capital cities, with Sydney having much higher housing costs than other capital cities. At the same time, states and territories such as Western Australia, Queensland and the Northern Territory incur substantially higher costs in servicing remote communities and more geographically dispersed populations. There is also significant variation in the levels of homelessness, with jurisdictions such as the Northern Territory and Tasmania having a much higher level of homelessness relative to their population.

By retaining a per capita funding formula, the NHHA will simply perpetuate this ‘winners and losers’ situation. States with higher proportions of public housing and associated costs will face greater financial pressures, while those with less public housing per capita will be able to underwrite their losses more easily. To overcome this, consideration should be given to developing a model for distributing funds that is sensitive to the widely differing costs of providing comparable services. This could include operational funding to manage and maintain existing stock (calculated on a *per dwelling* basis), in addition to growth funding to invest in new social housing stock (calculated on a *per capita* basis, or on a robust assessment of current and projected demand). Accurate data is needed to underpin any funding model and to show transparently and consistently what the social housing system in each state and territory costs.

### **Indexation**

If the NHHA is to be durable and achieve its objectives, funding must be adequately indexed. Under previous national agreements, inadequate indexation has resulted in a decline in funding in real terms. While the Bill does not specify the indexation formula, the Government has proposed maintaining the flawed ‘Wage Cost Index 1’ formula, which falls below the consumer price index and does not factor in relevant cost drivers, including population increases, construction cost increases, and wage increases (consistent with wage increases under the Equal Remuneration Order).<sup>4</sup> If funding is to maintain its relative value over time, the NHHA requires a more appropriate basis for indexation that reflects the relevant cost drivers in the housing and homelessness sectors, including population increases and indices such as the building construction index, house price index and wage price index.



**Recommendations:**

The NHHA should be underpinned by additional funding to maintain and grow the supply of social housing and to meet the demand for homelessness services. This funding regime should include:

- operational funding to manage and maintain existing social housing stock, distributed according to the number of dwellings in each state and territory and an assessment of net recurrent costs;
- capital funding for new social housing stock, distributed on a per capita basis or according to an assessment of current and projected needs in each state and territory;
- indexation that factors in relevant costs drivers and the actual costs of service delivery (including wages, land and construction prices, and population growth); and,
- discretely identified and quarantined funding for homelessness services that is commensurate with need.

## Prioritising Aboriginal and Torres Strait Islander housing

The future status of funding and policies for Indigenous housing remains unclear and is not guaranteed under the NHHA. At a population level, Aboriginal and Torres Strait Islander peoples experience disproportionately high levels of housing stress, overcrowding and homelessness.<sup>32</sup> Among Aboriginal and Torres Strait Islander public housing tenants, around one third live in accommodation that does not meet basic acceptable standards.<sup>33</sup> We firmly believe that any credible national effort to improve housing affordability and reduce homelessness must include specific policy commitments, dedicated resources and appropriate governance arrangements to improve outcomes for Aboriginal and Torres Strait Islander peoples. Future policy development must expand the opportunities for Indigenous participation in policy formation, including representative forums at a national and state/territory level.

Given the ongoing disparities in housing outcomes, we are deeply concerned about the Federal Government's failure to commit future funding to the National Partnership on Remote Housing (NPRH),\* which is due to expire in June 2018. At a national level, there also has not been sustained policy attention or funding commitments to support Indigenous housing in urban and large regional centres. This is despite the fact that over 75 per cent of Aboriginal and Torres Strait Islander households are located in urban and regional areas, rather than remote settings, and continue to suffer poorer housing outcomes and discrimination in rental markets.<sup>34</sup> The result is an absence of needs-based data and a well-defined and holistic policy and planning framework for Indigenous housing, both nationally and in most states and territories.<sup>35</sup>

It is imperative future agreements and strategies recommit to Indigenous-controlled and culturally appropriate service models, in addition to capacity-building initiatives in mainstream organisations. Homelessness services and strategies to prevent homelessness must also be responsive to the specific needs of Aboriginal and Torres Strait Islander peoples. This has generally not been the case to date, and reforms to the community housing sector through the NAHA and the introduction of a national regulatory scheme (NRS) have undermined the viability of many Indigenous Community Housing Organisations (ICHOs). This has included the dismantling of dedicated Indigenous housing funding programs in urban areas; the imposition of mainstream regulation, funding and policy

\* The December 2017 MYEFO made no provision for the renewal of the National Partnership on Remote Housing, although the Federal Minister for Indigenous Affairs has maintained negotiations are still ongoing.

regimes; and a weakening of most Indigenous housing representative, governance and policy institutions and mechanisms.<sup>35</sup> The shift of focus away from Indigenous-specific services in several jurisdictions has also contributed to a decline in reliable information about Indigenous housing needs and service provision, less engagement of Aboriginal and Torres Strait Islander stakeholders in the policy process, and reduced investment in organisational capacity-building.

It is critical the NHHA commits all levels of government to supporting the housing needs of Aboriginal and Torres Strait Islander peoples, including the development of policies, procurement processes and service models that recognise the importance of Indigenous-controlled and culturally appropriate service models.

**Recommendations:**

**The NHHA should acknowledge the importance of Indigenous-controlled and culturally appropriate service models and be linked to, and complement, a new national agreement on Aboriginal and Torres Strait Islander housing and homelessness that includes dedicated funding for housing and homelessness programs in urban, regional and remote locations.**

**Aboriginal and Torres Strait Islander organisations and representatives must be actively involved in developing policies and setting realistic targets and objectives associated with national housing and homelessness strategies and agreements.**

**The Commonwealth should negotiate with states and territories to identify a specified proportion of NHHA funding/growth funding or both be dedicated to ICHOs to enable a growth strategy to be developed for Indigenous Community Housing.**

## **Delaying the date of commencement**

Given the unresolved issues identified within this submission, and the desirability of further negotiations between the Commonwealth and state and territory governments, we believe the commencement date of July 2018 is unrealistic. Such a narrow timeframe will not allow for negotiations and for the appropriate level of consultation with stakeholders (including service providers, consumers, housing experts and other community stakeholders). It also creates the risk of a funding gap if the terms of the agreement cannot be finalised within the specified timeframe.

**Recommendation:**

**The transitional provisions in the Bill should be amended so that the new funding arrangements take effect when a new multiparty agreement comes into effect, or on 31 December 2018 (whichever comes first). This would mean that funds under the NAHA would continue to flow until the new primary agreement is reached. However, extending the deadline would require a commitment to extend the NPAH, which is scheduled to expire on 30 June 2018.**



## **Conclusion**

Housing is one of the most fundamental cross-cutting policy issues confronting Australian governments. It provides a foundation from which to participate both economically and socially in the life of communities. It is also a critical social determinant of physical health, employment outcomes, and social and emotional wellbeing. The current lack of affordable housing is a key driver of poverty and homelessness and, for the Society, increases the number of people seeking support from our frontline services.

Given the critical importance of housing and the urgent need for stronger national leadership in this area of policy, it is imperative the new National Housing and Homelessness Agreement provides the coordination, policy leadership and resources necessary to improve housing affordability and reduce homelessness. This includes the development of a coordinated and coherent national strategy which is supported by a clear delineation of role and responsibilities, adequate funding, mechanisms for improved collaboration and coordination across jurisdictions, and improved transparency and accountability.

As this submission has highlighted, we do not believe the proposed Bill achieves these objectives, and we urge the Committee to recommend significant revisions.

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