



# Community Housing Industry Readiness for the National Disability Insurance Scheme

Discussion Paper

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nsw Federation of Housing Associations inc

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# Paper Summary

The National Disability Insurance Scheme (NDIS) is a once in a generation reform to the way our community meets the needs of people with a disability. Currently in its launch phase, when the NDIS is fully operational in 2019 it will meet the lifetime care and support needs of over 430,000 Australians with a disability. Participants in the NDIS will have choice and control over their supports, opening up new opportunities for social and economic participation for what has been one of the most marginalised groups in the community.

At this early stage it is clear that the ability of people with a disability to access full benefits of the NDIS will be constrained by a lack of suitable and affordable housing. While the NDIS will not (for the most part) assist participants meet housing costs, the NDIS will nonetheless have a role to play in conjunction the wider housing system to develop new housing options for people with a disability. The NDIS includes a component for contributing to the capital cost of housing for NDIS participants of up to \$700 million annually. How this is best distributed in a context of our housing system remains open for debate.

Community housing providers stand ready for this challenge. Indeed, they already play a significant role in housing people with disability, and will continue to do so in the future. They have formed strong and constructive partnerships with the disability support sector to sustain successful tenancies.

This new landscape is an exciting one in which community housing providers may be able to access new forms of funding and offer more homes which are better suited to the needs of people with a disability. It also an uncertain environment in which providers may be asked to accept new risks, work within changed networks and form different relationships with their customers.

This paper is an issues paper designed to continue the conversation about how the NDIS and housing might work. It aims to ensure that the Federation and its members continue to play a leading, positive and constructive role to shape the emerging policy agenda.

Based on feedback from stakeholders and the roundtable discussions, we will produce a final report. The final report will aim to:

- be a sector resource and inform the strategic planning of community housing providers in this space;
- inform and influence policy development by the NSW Department of Family and Community Services (FACS) and the National Disability Insurance Agency (NDIA); and
- inform stakeholders such as NDIS participants and support providers about issues for community housing providers.

# Background

## 1.1. About the project

This project aims to identify the critical next steps for ensuring community housing providers are ready to play a significant role in the delivery of housing for people with disability in the context of the NDIS.

This project is part of the FACS and NSW Federation of Housing Association's Industry Development Strategy 2014/2015. It builds on the Federation's housing and disability forum held in August 2014<sup>1</sup> as well as the Community Housing Federation of Australia event held in March 2014 in Canberra.<sup>2</sup>

## 1.2. Project objectives

This project looks at the issues associated with the NDIS and housing from the perspective of community housing providers themselves. It will ask what skills and capacity providers require to meet the challenges of the NDIS, and in particular:

- What capacity exists at present amongst providers?
- What capacity will need to exist amongst community housing providers in the future?
- What tools/networks/support will be required for community housing providers for them to obtain that capacity?
- What risks exist in the changing and uncertain landscape and what strategies can be employed to mitigate and manage these risks?

This project does not seek to analyse issues from a consumer perspective or the way supports are delivered under the NDIS. However the interests of NDIS participants and those who support them to live independently will nonetheless drive best practice in this area.

The Federation will work with the community housing providers and other stakeholders to continue to inform the development of funding models for housing people with disability. In order to support community housing provider readiness, the project will document policy approaches that may be appropriate for these models.

## 1.3. Methodology

The matters set out in this issues paper will be discussed at two roundtables as follows:

Federation Member (invited to participate)	Broader stakeholders
When: Friday 17 July 2015	When: September 2015
Where: Sydney, Hotel Rydges, Surry Hills	Where:TBC

The roundtables will be a structured discussion on the research questions set out in part 3 of this issues paper, but these issues are only intended to frame the discussion and other matters not canvassed in this paper are also welcome.

For those members or who do not participate in the roundtables, the Federation welcomes input either in writing or by contacting the Federation. In particular, the Federation is keen for its members and other stakeholders to provide information about current or proposed projects to serve as examples of a future housing system for people with disabilities.

## Context

### 1.4. Why do we have the NDIS?

A report of the Productivity Commission in 2011 found that the disability support system was underfunded, unfair, fragmented, and inefficient, and gave people with a disability little choice and no certainty of access to appropriate supports. It recommended that a new, national scheme be implemented to allow the cost of lifetime care for people with disabilities to be pooled.<sup>3</sup>

The *Every Australian Counts* campaign built a broad coalition of people with disabilities, carers and support providers around campaign for the NDIS. The Commonwealth government committed to implementing the scheme in a manner consistent with the Productivity Commission's recommendations. The Commonwealth Parliament adopted legislation to implement a trial of the NDIS with multi-partisan support in 2013. Trials of the NDIS commenced on 1 July 2013.

### 1.5. How does the NDIS work?

The NDIS is a universal social insurance scheme, funded by the federal, state and territory governments. To be eligible, participants must be under 65 and have a permanent disability that substantially reduces the person's ability to participate effectively in activities, or perform tasks or actions without assistance. The NDIS:

- adopts an insurance-based approach, administered by an independent statutory authority (the NDIA), which seeks to minimise costs over time by early intervention and looking at lifetime costs of providing support based on actuarial principles;
- covers all disabilities on a "no fault" basis (regardless of how the disability was acquired);
- pays all reasonable and necessary supports on a lifetime basis until a person turns 65;
- gives people covered by the scheme (known as NDIS participants) choice and control over how supports are delivered, including a choice of provider. This is in contrast to existing models where government and non-government providers are funded directly and offer services to clients.

Once a person is eligible for assistance under the scheme, a person with a disability develops their own plan which is then approved (and reviewed) by the NDIA.

The NDIS is currently in operation in seven trial sites nationally. In NSW, a trial in the Newcastle, Lake Macquarie, and Maitland Local Government Areas commenced on 1 July 2013. The scheme is due to be rolled out nation-wide by 2019, and in NSW by July 2018.<sup>4</sup> Following the 2015 NSW elections., the Baird Government committed to an accelerated rollout of the NDIS in Penrith and the Blue Mountains for young people under 18 from July 2015.<sup>5</sup>

When the full scheme is operational in 2019, the NDIS is expected to have 431,000 participants and an annual funding envelope of \$22 billion.<sup>6</sup>

The Baird Government has indicated that the NDIS rollout will include transfer all supported accommodation properties from ADHC to the not-for-profit sector under a legislative framework adopted to transition to the NDIS.<sup>7</sup>

## 1.6. How does the NDIS interact with housing?

The Productivity Commission considered that housing, as universal need, is a “mainstream service. This means that housing, as well as other mainstream services such as education, employment and health is outside the scope of the NDIS, to require providers of those services to include people with disabilities in their planning and service delivery. The Commission warned against the NDIS responding to shortfalls in mainstream services by providing its own substitute services, as this would weaken the incentives for governments to properly fund mainstream services for people with a disability.<sup>8</sup>

In general terms, while the NDIS will not pay rent or mortgage payments for NDIS participants, it can assist NDIS participants to meet their housing needs and aspirations by:

- funding reasonable and necessary home modifications (although not home modifications to legacy public and community housing dwellings);<sup>9</sup>
- providing reasonable and necessary in-home supports to assist people with disabilities to live independently and sustain tenancy obligations; and
- empowering people with disabilities and their carers to participate to a greater extent in the labour market, thereby improving household incomes and the ability to afford housing.

The Commission did recommend that the scheme fund “specialist disability accommodation” for people with severe disabilities and included a notional “user cost of capital” allocated as follows:

- the NDIS would not necessarily own the bricks and mortar, but the funding would cover the cost of capital;
- individual participants could be allowed to “cash out” their accommodation component as a lump sum to be spent on a choice of accommodation; and
- there should be a separation between the ownership of accommodation and the delivery of support.<sup>10</sup>

This was expected to apply to around 28,000 people, or 6% of NDIS participants and was costed at around \$700 million at full national rollout of the scheme in 2019.

## 1.7. Estimating the unmet housing need for people with disabilities

There is little doubt that there is a significant unmet housing need for people with disabilities. Understanding the nature and extent of this need is a critical question for planning for the NDIS.

People with a disability face a significantly higher risk of poverty - in 2009 this was 27.4% compared with 12.8% for the total population.<sup>11</sup> For this reason alone – but also because of shortage of suitable adapted accommodation in the private market and social housing system – it is likely that people with disabilities will remain disproportionately represented amongst those seeking housing assistance.

The NDIA estimated an unmet need for affordable housing of between 83,000 and 122,000 NDIS participants as follows:

- There are around 410,000 people who will become NDIS participants.
- Of these, 255,000 are aged 25 to 64 (that is, at an age when the community would expect people to be living independently).
- Of these between 154,000 to 193,000 participants are on low and very low incomes who may need housing assistance from some source (including those already with assistance).

This includes:

- 6,200 people under 65 in residential aged care (600 aged under 50);
- 17,000 people in specialist disability accommodation (3,000 in institutions and 14,000 in group homes); and,
- 57,000 living in social and public housing.<sup>12</sup>

In NSW alone this could mean an unmet need of approximately 40,000 NDIS participants.<sup>13</sup> The very wide nature of this estimate indicates a lack of understanding by government of demand in this area, perhaps due to an unwillingness for people with disabilities to register for social housing or supported accommodation (owing to long waiting times or a lack of awareness of options). The full extent of NDIS participation is not yet understood from the limited experience of the launch sites.

The social housing system already plays a key role. In NSW, around 35% of current social housing tenants have a disability. However, the system is under significant strain:

- 25% of the 59,500 approved applicants for social housing list the Disability Support Pension as their main source of income;<sup>14</sup>
- the number of people with disability living with ageing parent carers increased from 13,000 in 2003 to 21,000 in 2012; and
- there are more than 2,300 people under 65 living in NSW aged care facilities.<sup>15</sup>

Research from the University of New South Wales commissioned by FACS into accommodation support found that while models of support were improving the independent living skills of people

with a disability, housing affordability remained a major barrier to moving out of the family home for many people.<sup>16</sup>

## 1.8. How might the NDIS support the supply of new housing?

Without additional investment, the existing social housing and supported accommodation systems will be unable to meet the unmet demand for housing for NDIS participants. The question then is how the NDIS might allocate the user cost of capital.

The Chairman of the NDIS, Bruce Bonyhady, indicated in 2013 that the user cost of capital may not be confined to participants with high needs, and may be made more widely available to meet unmet housing needs of all NDIS participants and that the NDIA was working on a discussion paper on housing.

In recent times governments have adopted a more cautious tone. In 2014 the then Minister for Social Services Andrews stated that the NDIS will not take over the responsibility of the housing sector or replace support provided by families.<sup>17</sup> More recently, at the COAG Disability Reform Council meeting on 24 April 2015, disability services ministers from all jurisdictions stated that while the NDIS includes capital costs for specialist accommodation, some of these funds will need to support existing specialist accommodation supply. The balance of funds will support people with disability requiring an integrated housing and support model to access housing and to enable the market to generate and leverage new and innovative specialist disability housing.

The COAG communiqué stated that the NDIA and states and territories will support the development and testing of innovative accommodation pilots in trial sites that will help to expand the supply of appropriate and sustainable integrated housing and support models for people with disability. This will focus on pilots in the trial sites to provide evidence about how different models contribute to outcomes for NDIS participants.<sup>18</sup>

The Every Australian Counts campaign has described housing as “the big sleeper” in the implementation of the NDIS.<sup>19</sup>

# Emerging issues

Amongst important emerging issues for community housing providers in the NDIS – both in terms of risks and opportunities – three broad themes emerge. These are discussed in this section.

## 1.9. Allocation of the cost of capital

Community housing providers are well-placed in this context because:

- they enable assets to be managed separately to the provision of support;
- the NDIA wishes to fund and not own assets;
- they are transparent and regulated entities by which co-contributions from government and families can be blended.

Community housing providers have experience in blending contributions from multiple funding sources. For example, providers used National Rental Affordability Scheme (NRAS) payments with income from other sources, such as net income streams from other housing programs or land transferred to community housing providers to generate new supply. In NSW, as at 30 September 2014, endorsed charities held 64% of all NRAS allocations.<sup>20</sup> Co-contributions also mean that housing targeted at NDIS participants is more likely to be integrated within mainstream housing provision and preventing over-concentration of new outcomes.

Community housing providers have other advantages over publicly owned bodies and the private sector, such as tax concessions available to charities, tenants being entitled to CRA, the ability to raise private capital and the ability to seek contributions from other project partners.

Co-contribution of NDIA funding could come from a range of sources:

### **State government funding or asset transfers**

NSW Government co-investment could take the form of new capital subsidies, such as the proposed new fund of up to \$1 billion for new social and affordable housing.<sup>21</sup> Asset transfers can also play a role in providing undercapitalised land and additional net income streams. The community housing industry in NSW now holds \$822.9 million in housing assets, most transferred by government but some as a result of development activities.<sup>22</sup>

Asset transfers of supported accommodation are also likely, however at this stage there is no indication as to how this process may occur.<sup>23</sup> Some facilities may be on significantly undercapitalised land that can be used for property development. Other facilities may be in need of significant maintenance or be in need of total replacement, either because they are inappropriate (e.g. closed institutions) or have reached the end of their economic life.

## **Co-investment from family members or individuals (shared equity)**

Government and consumers broadly agree that families and individuals should contribute to the cost of their own housing if able to do so. Managing these models, and the expectations of family members and others who have contributed financially to a property will be complex.

To be successful these models will need to address equity issues around allowing those with capital to gain priority access to housing for themselves or family members (see part 3.3). Community housing providers will need to carefully manage the expectations of all stakeholders in such programs.

## **Private finance**

Community housing providers across NSW now have experience in raising private finance, with registered community housing providers in NSW now supporting interest-bearing debt of \$137 million.<sup>24</sup> The extent to which more debt can be supported depends on:

- assets under ownership to be used as security for debt (known as a loan to value ratio); and
- ability to service debt via the net income stream produced by housing assets (known as interest cover ratios).

If housing is allocated to those considered most in need – being those whose income is predominantly the Disability Support Pension (DSP) and CRA – then net income streams may be limited. This also exposes providers to risks of the method of indexation of the DSP or CRA changing, although in recent times the Commonwealth government has backed away from such proposals.<sup>25</sup>

A mixed tenancy profile based on households with a range of income profiles, or setting some rents on a discount-to-market (as opposed to household income) basis can overcome these limitations. However, this would require different considerations of access and equity (see section 3.3).

## **Other contributions from philanthropic sources or local communities**

Philanthropic investment may not provide a significant number of outcomes and may require significant investment by community housing providers to harness, with an opportunity cost. It could however be a source of funds for innovation and demonstration projects, to test new housing and support models and to pay for them to be evaluated. The Summer Foundation, established to provide housing to get young people with a disability out of aged care, is an example of this.<sup>26</sup>

## **How might user cost of capital be distributed?**

The NDIS Rules fund capital where a person requires an integrated housing and support model and the cost of the accommodation component exceeds a reasonable contribution from individuals. Taken broadly, this could mean housing where the provision of that housing reduces the overall

cost of providing support to that particular NDIS participant, taking a lifetime approach to that person's care and support.

Funds are most likely to be allocated under a contestable process in which applicants for funding set out the location and types of housing to be constructed, the target cohort and the level of co-investment. The user cost of capital could be distributed in a number of ways, which could form part of the pilot of housing programs run by the NDIA in trial sites:

Format	Benefits	Risks
<p><b>Individual subsidy</b></p> <p>Payment made by NDIA to housing provider as part of approved plan of NDIS participant</p>	<p>More consistent with design of NDIS. NDIS participants can direct subsidy towards housing of their choice.</p>	<p>Housing providers could be left with bearing costs of vacant stock if person moves elsewhere and no replacement NDIS participant can be found.</p> <p>Level of subsidy may be insufficient or too uncertain to stimulate new supply.</p>
<p><b>Recurrent subsidy from NDIA</b></p> <p>NRAS-type payment from NDIA on annual basis (for time-limited period) in return for making housing available to NDIS participants</p>	<p>NDIA able to target areas of need (typologies and location) through funding rounds</p> <p>Recurrent subsidy boosts cashflows and can support debt payments and/or co-investment by state government in form of land transfers.</p> <p>Housing no longer required at end of subsidy period can be sold or used for other purposes.</p>	<p>NRAS has in practice been a complex program to administer. Payments can be forfeited or delayed for minor reasons.</p> <p>Planning by NDIA and community housing providers for expected demand may be inaccurate, leading to inappropriate supply of new dwellings.</p> <p>If subsidy is a fixed amount (as in NRAS), this does not reflect differential costs of particular housing designs and locations.</p>
<p><b>Capital grants</b></p> <p>Up-front capital payment to support new housing construction</p>	<p>Simplest to administer – acquit funding once upon completion of construction.</p> <p>Most familiar form of funding for community housing providers. Up-front grant can lower construction costs by financing development costs.</p>	<p>Inconsistent with design of NDIS – “block funding” approach.</p> <p>Less likely to be responsive to actual client needs or promote innovation in funding models.</p> <p>Risk that housing constructed quickly becomes obsolete or inappropriate owing to changes in support practices or client demographics.</p>

#### Questions for discussion:

- How best should NDIS funding be allocated?
- How can we ensure that there is co-investment from the NSW government?
- What examples of co-investment exist? How might they be rolled out at scale?
- What is the appetite amongst community housing providers to take on the ownership and/or management of supported accommodation?
- What capacity exists for raising debt finance to support new supply?
- How might community housing providers market themselves to participants who have a capital subsidy or can make a contribution to their own housing?

## 1.10. Housing models and interaction with support

For the most part, people with disabilities have similar housing needs to the rest of the community - quality, affordable, well-located and secure tenure homes. Some NDIS participants may also require housing that:

- is modified and /or adapted to meet the needs of a particular physical disability; and/or
- facilitates support being delivered in a particular way, either in a shared environment or by allowing 24-hour carers to be located nearby.

The extent to which people with disabilities need housing with these particular attributes is unclear. Most likely it will be a minority of homes, with most only complying with the Silver Level of the Liveable Housing Design Guidelines to enable ageing in place.

In the NSW launch are the majority of NDIS participants have an intellectual rather than a physical disability.<sup>27</sup> Group housing has been the dominant model for that cohort, based largely on the economic and workforce constraints of delivering 24-hour care. However, consumers are expressing a clear preference for independent living. Over half of the respondents to a housing survey run by the Every Australian Counts campaign who expressed a clear preference told the campaign that they preferred to live in a home of their own that does not involve sharing with other people with disability.<sup>28</sup>

The NDIS will fund accommodation support that facilitates people with disability to live as independently as they choose in an accommodation arrangement of their choice, and with formal support that suits their preferences and life goals. Recent research into these support programs in NSW found that many people supported by those programs living in independent accommodation had been realised mainly where families had some capacity to assist or the support worker could help with accessing social housing.<sup>29</sup> Therefore it appears that the issue may not always the adaptability of the housing, rather its affordability and tenure security.

Over time it is likely that the previously distinct supported accommodation and social housing systems will converge. This will open up new possibilities to access a range of options to maximise independence, but also have the ability to step into a more supported environment circumstances change. Importantly, this should allow the NDIA to explore how more appropriate housing might reduce the overall cost of delivering support, consistent with its insurance-based approach to lifetime care.

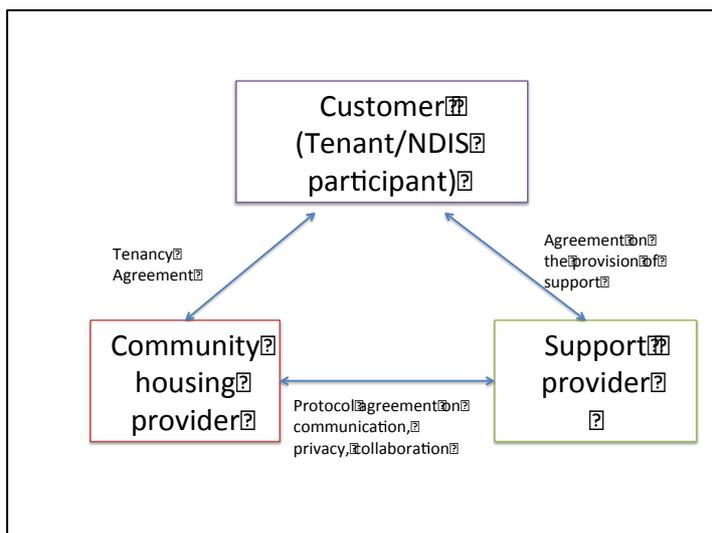
This convergence challenges community housing providers to build new partnerships with the disability support sector. It may see more disability support providers, which already manage supported accommodation, enter the housing space and develop new capabilities to construct and manage housing assets.

Therefore to meet needs of NDIS participants broad range of typologies will be required from family home to smaller units. Some, but not all, will be connected to carer’s facilities to enable a group of residents with a disability to pool supports to enable 24-hour care. Within these typologies there are opportunities to apply support models such as keyring models and intentional communities.

Despite the enthusiasm of some communities and consumer groups for these specialised models, Community housing providers will be wary of the risk of housing models becoming obsolete if support models change.

## Exercise of choice and control over supports in a particular housing context

While housing and support have often been delivered separately, there has been a strong link between the two. Both current and some future housing models require NDIS participants to aggregate at least part their NDIS funding in order to deliver a required level of care and support. Models of independent living have also relied on strong partnerships between support and housing providers for the referral of suitable clients (often through systems of “nomination rights”) and to assist clients to sustain tenancy obligations.



How these models will work in a context of individualised funding of supports remains unclear. In environments where multiple participants' pool supports, some form of private agreement may be necessary. Participants would agree to have support provided by a particular provider, and agree to leave if they want to change support and fellow residents do not. This means that choice and control for some NDIS participants may be constrained by a particular housing context.

Managing tensions between NDIS participants in these settings can pose challenge for community housing providers. Many providers have been used to dealing with a single support provider who was block funded to deliver support to all tenants in a particular housing development.

Community housing providers will need to become adept at working with multiple providers who may change over time, and develop systems and processes to deal with circumstances where there are concerns about client welfare or the ability of a person to sustain tenancy obligations.

## Tenancy models

The creation of new forms of housing for NDIS participants also raises issues around tenancy management and the capacity of individuals with an intellectual disability or diminished capacity to understand and consent to tenancy obligations.

Our current legal framework treats many people with intellectual disabilities similar to minors in that they lack capacity to sign agreements and this must be done through a guardian. The Australian Law Reform Commission has recommended a new framework of supported decision-making to better support individuals with disabilities to make decisions for themselves or be represented where this is not possible.<sup>30</sup> At this stage these recommendations have not yet been adopted.

### Questions for discussion:

- What models have providers tested? What has been their experience? In particular, what has been the experience with the SAIF projects?
- What skills and capacities are required to develop housing models that are appropriate for people with disabilities but flexible to meet changing needs?
- What has been the experience of providers in the launch area of NDIS participants exercising choice of service provider?
- What capabilities and systems will be required to sustain tenancies in NDIS landscape?
- Are traditional residential tenancy models adequate to cover the sometimes complex shared living and support arrangements which are required?
- How might we test the idea that support costs can be lowered through maximising independence?

## 1.11. Access, allocation and equity

If the NDIS allocates its “user cost of capital” not to individuals, but to the housing system as a whole, then the housing system will need to account for the how NDIS participants access housing funded by that capital. Given the scale of the deficit of affordable homes it is likely that there will continue to be rationing of supply for some decades to come.

Housing allocation has to balance competing requirements of:

- **Appropriateness** - matching the right applicant to the right property;
- **Choice** – ensuring applicants have an opportunity to express their preferences and to consider whether an offer of housing meets their needs, without being unreasonably penalised for rejecting an offer and to pay more in rent for a property that offers other benefit to them that will save them in other ways;
- **Provider viability** - ensuring sufficient rental revenue is generated and minimising extended vacancy periods;
- **Equity** - allocating to those most in need and who have been waiting for long periods; and
- **Transparency** – a system which is not just fair but seen as being fair.

As stated in part 3.2, it is likely that we will see convergence between the supported accommodation and social housing systems over time. Additionally, the ADHC managed register for supported accommodation is likely to be redundant once the NSW government ceases to be a provider of supported accommodation with the full rollout of the NDIS.<sup>31</sup> This will require new systems of access and allocation combining the full spectrum of options available.

In the context of a system which also accommodate NDIS participants, the tensions in this area include:

- NDIS participants eligible for housing assistance through the NDIA may not all be eligible for social housing. Therefore, social housing entry points like Housing Pathways may not be suitable for all NDIS participants.
- Particular financial models may require maintenance of a mixed tenancy profile where some tenants pay higher rents (perhaps on a discount to market rent basis) to cross-subsidise other tenants on very low incomes. This raises tensions between housing those perceived most in need and maintenance of a particular rental model.
- Shared equity models (discussed in part 3.1) prioritise those who already have capital to contribute to their own housing over those who cannot.
- Environments where individuals share, provide each other with support or build independent living skills will require careful allocation and perhaps the opportunity to test out certain environments. This will have implications for rental loss through vacancies as well as being able to meet regulatory benchmarks.

- Competing priorities on the social housing system from other groups also perceived as being high in need – for example people experiencing or at risk of homelessness, victims of family violence or people suffering mental ill-health. In this respect there appears to be a lack of confidence in the social housing system amongst people with a disability based on the perception that ‘most in need’ allocations overlook people with disability until their situation becomes dangerous or untenable.<sup>32</sup>

The notion that housing as a mainstream service should simply be inclusive of NDIS participants is sound in principle. Using the existing social housing access point (Housing Pathways) but adapting it to record NDIS participants housed is one way of holding recipients of NDIS funding accountable. It can also be used to assess the baseline of NDIS participants currently housed by the social housing system to ensure that NDIA capital funds create new outcomes for NDIS participants and do not allow costs to be shifted elsewhere.

For NDIS participants who cannot or do not wish engage with the social housing system, a more flexible and user-oriented interface such as an information exchange or choice-based letting system may be useful. As well as being consistent with the person-centred approach of the NDIS, this would allow NDIS participants to network and better understand the range of options available and plan for their own housing career.

This is also potentially a space for community housing providers to explore innovation in their own businesses by developing new services and products for a broader “affordable housing” market and generate additional revenue to support growth in housing for people most marginalised by the housing system.

**Questions for discussion:**

- How might we ensure NDIS funding for housing is targeted towards new supply for NDIS participants?
- How do we ensure that the existing social housing system remains engaged in housing people with disabilities?
- How to we best match the right person to the right property? Should existing systems be expanded or are new approaches needed?
- With the winding down of allocation to supported accommodation by ADHC, who will manage these properties into the future and how will they look? How can community housing providers position themselves to be “the provider of choice”?
- What are the implications of targeting tenancies to those perceived as most in need?
- How can community housing providers ensure that allocations are appropriate while minimising vacancy periods and rental loss?

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## References

- <sup>1</sup> The forum's communiqué can be found at:  
[http://www.communityhousing.org.au/HousingMatters/items/NSWFHA%20industry%20forum%20on%20NDIS%20and%20housing%20presentations%20and%20summary\\_Oct%20eHM.pdf](http://www.communityhousing.org.au/HousingMatters/items/NSWFHA%20industry%20forum%20on%20NDIS%20and%20housing%20presentations%20and%20summary_Oct%20eHM.pdf)
- <sup>2</sup> The CHFA event's communiqué can be found at: <http://chfa.com.au/content/accessible-housing-housing-disability-and-ndis>
- <sup>3</sup> Australian Government, Productivity Commission Inquiry Report, *Disability Care and Support*, page 2.
- <sup>4</sup> Presentation by FACS to NSWFHA housing and disability forum, held in August 2014
- <sup>5</sup> Sydney Morning Herald (22 March 2015) *Baird pledge: National disability scheme to start a year early*
- <sup>6</sup> National Disability Insurance Agency, *Interim report: Review of the optimal approach to transition to the full NDIS* (July 2014) page 5
- <sup>7</sup> National Disability Scheme (NSW Enabling) Act 2013
- <sup>8</sup> Productivity Commission, page 238
- <sup>9</sup> National Disability Insurance Scheme (Supports for Participants) Rules 2013, rule 7.19(c)
- <sup>10</sup> Productivity Commission, pages 229-232
- <sup>11</sup> Australian Council of Social Services, *Poverty in Australia* (2014)
- <sup>12</sup> *The National Disability Insurance Scheme: A catalyst for scalable, affordable and accessible housing for people with disability*. Bruce Bonyhady AM, Chairman National Disability Insurance Agency, Community Housing Federation of Australia Conference, Canberra, 27 March 2014.
- <sup>13</sup> Based on NSW's overall share of the Australian population.
- <sup>14</sup> NSW Government, Family and Community Services, *Social Housing in NSW: A discussion paper for input and comment*
- <sup>15</sup> National Disability Services, *Changing the System: NDS's response to the 'Social Housing In NSW' Discussion Paper*, page 9.
- <sup>16</sup> Purcal et al (2014) *Supported Accommodation Evaluation Framework Summary Report (SPRC Report 31/2014)* for the NSW Department of Family & Community Services, Ageing Disability and Home Care. Sydney: Social Policy Research Centre, UNSW Australia
- <sup>17</sup> Opening remarks to the CHFA Housing, Disability, and the NDIS forum, Canberra, 27 March 2014.
- <sup>18</sup> COAG Disability Reform Council Communiqué, 24 April 2015 at <http://mitchfield.dss.gov.au/media-releases/coag-disability-reform-council-communiqu>
- <sup>19</sup> Every Australian Counts, *Housing: The Big Sleeper* at <http://www.everyaustraliancounts.com.au/ndis-housing-big-sleeper>
- <sup>20</sup> Commonwealth Government, *NRAS Quarterly Performance report for September 2013*
- <sup>21</sup> Sydney Morning Herald (13 March 2015) *Mike Baird brokers \$1 billion social and affordable housing deal*

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- <sup>22</sup> Registrar of Community Housing, *Annual Statement of Performance 2014*, page 47.
- <sup>23</sup> National Disability Services, page 9.
- <sup>24</sup> Registrar of Community Housing, *Annual Statement of Performance 2014*, page 47.
- <sup>25</sup> Sydney Morning Herald (6 April 2015) *Abbott government prepares to dump pension barnacle*
- <sup>26</sup> Fairfax Media (12 April 2015) *Tech-enabled homes give people with disabilities independence*
- <sup>27</sup> National Disability Insurance Agency, *Report to the Disability Reform Council*, 31 December 2014, page 27 table 1.1.1(b)
- <sup>28</sup> Every Australian Counts, *A Place I can Proudly Call Home*, April 2015
- <sup>29</sup> Purcal et al page 8.
- <sup>30</sup> Australian Law Reform Commission, *Equality, Capacity and Disability in Commonwealth Laws*
- <sup>31</sup> National Disability Services, p16
- <sup>32</sup> National Disability Services, p.9