

Review of Rent Models for Social and Affordable Housing

Yfoundations Submission

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Executive Summary

Yfoundations welcomes the opportunity to comment on the review of rent models for social and affordable housing. Our comments in this submission are, where possible, arranged under the relevant headings and questions from the issues paper. In brief, our comments are:

- The lack of explanation within the issues paper as to which criteria will inform decision on which cohort to place tenants in, or indeed who will be making these decisions and what qualifies them to do so, is troubling.
- There are no opportunities for young people who have lived within the social housing arena their whole lives to access affordable housing, helping them to escape the intergenerational cycle of disadvantage.
- Young people transitioning out of social housing into the private rental market must be given the opportunity to find their feet through trial and error. Currently, the system does not provide for those young people who need support to fluctuate between properties within the private rental market for whatever reason. This lack of support could force people into homelessness or into untenable living situations because of, for example, landlords taking liberties and refusing to meet their obligations or difficult co-tenants.
- There is little to no user choice within the social housing arena with tenants assigned properties as and when they become available irrespective of whether that property is really suited to their needs.
- There are too few affordable housing properties for individuals within the very low and low income thresholds, and very little of those properties are assigned to young people under the age of 25.
- Rent assistance is not meeting the needs of young people who are already stretched thin in an increasingly expensive private rental market and at a time when permanent, full-time jobs are declining.
- The current income threshold for eligibility for public housing lease renewal is either under-generous or over-generous depending on the median weekly rent of areas around NSW. At the current threshold, social housing tenants living in rural parts of NSW are able to rent in the private rental market without being in rent stress, while individuals living in metropolitan areas are unable to do so.
- There is currently no recognition within the social housing sector of young people's vulnerability as a direct result of their age. This lack of recognition means that young people are not classed as being in priority need of housing and often face lengthy wait times for social housing, isolating them from their communities, stable career opportunities and further education.
- A tapered subsidy model, while at first glance promising, needs to be fully evaluated before being implemented.
- The transition of social housing into affordable housing would need to be offset by the addition of new social housing to the property portfolio. Doing so without a clear idea of how to ensure a continuous flow of housing for those in need would be short-sighted and exacerbate an already stretched thin social housing sector.
- Yfoundations continues to support the ability of tenants to choose whether to opt in or opt out of automatic deduction of rent, giving individuals control, choice and autonomy over their actions.

Recommendations

Recommendation 1: Organisations and interested parties should be given an adequate amount of time to consider and review the issues presented to them and to formulate a well thought-out and viable submission.

Recommendation 2: Consideration should be given to staging the review with eligibility and priority for social housing addressed first, followed by the review of rent models.

Recommendation 3: A panel of experts made up of representatives of peak bodies and relevant government agencies and academics with expertise in social and affordable housing rent models should be established.

Recommendation 4: Social housing tenants could be categorised not by arbitrary cohorts, but by the support and rental model that best suits their own aspirations.

Recommendation 5: Considering intergenerational disadvantage in eligibility criteria could help break the cycle of disadvantage and poverty by giving intergenerationally disadvantaged young people greater access to affordable housing.

Recommendation 6: Introduce a 'right of return' for young people who are returning to social housing from the private rental market.

Recommendation 7: Trial introducing user-choice into social housing, not only improving the responsiveness of the social housing sector but also, giving young people the opportunity to have a say in where they want to live, work and settle.

Recommendation 8: Focus on early intervention and the provision of affordable housing for those on very low and low incomes, rather than an untenable narrowing of the assessment criteria for social housing.

Recommendation 9: Alternative assistance for those who do not have a priority need for social housing include increased access to transitional and affordable housing for young people, increased rent assistance and the efficient use of housing stock.

Recommendation 10: The trial and evaluation of a voluntary system whereby those whose circumstances and eligibility for certain properties have changed, are given the choice to move.

Recommendation 11: Evaluation of income threshold for eligibility for public housing lease renewal set at a rate that is commensurate with the median rent in that given area.

Recommendation 12: Recognition within the social housing sector of the vulnerability of young people as a result of their age, and their inclusion in the order of priority in which tenants are housed.

Recommendation 13: If a segmented rental framework is introduced, social housing tenants must be given self-determination in selection their model for their tenancy.

Recommendation 14: Positive early indications with regard to a tapered subsidy rent-setting model however we would advise against its recommendation until it has been fully evaluated.

Recommendation 15: Before transitioning social housing to affordable housing, there will need to be a clear outline of how the government intends to add to the social housing portfolio and meet the needs of the population, at a time when wait lists for social housing are growing.

Recommendation 16: the percentage of household income used to calculate social housing rent should not be changed and currently exempt income supplements should not be included in assessable household income

Recommendation 17: In an income-based rent model income from work is best assessed on an after-tax basis.

Recommendation 18: The continued use of voluntary options to opt in or out of automatic deduction of rent, as well as the trial and evaluation of rent abatements where rent is paid in advance or on time.

About Yfoundations

Yfoundations' mission is to create a future without youth homelessness. We are the NSW peak body on youth homelessness and represent young people at risk of, or experiencing, homelessness, as well as the services who provide direct support to them.

Since its formation in 1979 this organisation has called for reform and improvement to broader systemic responses to youth homelessness and young people at risk of homelessness. Yfoundations provides advocacy and policy responses on issues relevant to young people affected by homelessness and issues relevant to service providers.

Our aim is to promote, protect and build on existing good practice and excellence in addressing youth homelessness. We also strive to ensure that youth homelessness remains a priority in public policy on: homelessness, youth affairs, youth justice, education, child protection, employment, health/wellbeing, and housing. Our vision is to ensure that all young people have access to appropriate and permanent housing options that reflect their individual need.

In pursuit of these goals, we have identified five 'foundations' for the positive growth and development of a young person and the process of ending youth homelessness:

- Home & Place
- Safety & Stability
- Health & Wellness
- Connections & Participation
- Education & Employment

These foundations place youth homelessness in a broader context, recognising that it interrelates with a range of issues, and that ending youth homelessness will require coordination across silos. They provide a framework for reaching out to other service areas to explore collaborative and integrated solutions. We believe it is vital that each young person has the opportunity within each domain to thrive. More information about these foundations is available on Yfoundations' website:

<http://yfoundations.org.au/explore-and-learn/publications/the-foundations/>.

Introduction

Yfoundations welcomes the opportunity to provide input into IPART's review of rent models for social and affordable housing. Where possible our submission is structured to follow the format of the issues paper. The majority of our comments are ordered under the discussion questions put forward in the issues paper, and the headings for these comments are drawn from the issue paper section headings.

However, some of our comments do not readily fit in the structure of the issues paper. For this reason our submission starts with background information young people and youth homelessness in relation to social housing. Although many of our comments are applicable to all social housing tenants, the particular circumstances of young people provide an important frame to our input.

Next we provide some comments on the scope of the review and what that means for how the review might best be conducted, before moving on to the address the issues paper questions.

It should be noted that in formulating this submission Yfoundations collaborated with a number of other peak bodies including Youth Action, Homelessness NSW, DVNSW, NCOSS, the Tenants' Union of NSW, and Shelter NSW. We are in substantial agreement with the views of those organisations.

Youth disadvantage and social housing

Having a home is more than just a necessity; it is considered a fundamental human right (United Nations, 1976). Homes provide safety and security, they connect you with your community, allow you to access employment and education and facilitate overall health and wellbeing.

Young people are overrepresented amongst the homeless population, with an estimated 39% of the NSW's homeless population under the age of 25 (Chalouhi et al., 2010), although this number is likely to be higher in reality. Young people aged 25 or under comprise the largest single group accessing specialist homelessness services (SHSs) in NSW at 50.1% (Housing NSW, 2014). After support, about 7 out of 10 remained homeless (MacKenzie, 2016). To add some perspective to these numbers, projected figures estimate that 15-24 year olds make up only 12.3% of NSW's population in 2016 (Centre for Epidemiology and Evidence, 2015).

Conversely, young people as main tenants are underrepresented in the public housing arena. Data released by the Australian Government (2010) reports that, in 2009, there were 9,865 public housing households with a young main tenant aged 24 years or under nationwide. There were an additional 2,427 households in community housing where the main tenant was aged 24 years or under. In comparison there were 340,318 households where the main tenant was aged 25 years or over.

In NSW, in 2012/13, there were 140,501 people living in social housing; 110,059 in public housing, 25,973 in community housing and 4,469 in state owned and managed indigenous housing (SOMIH). Young people under the age of 25 as main tenants represented only

1.6% of those living in public housing (6.4% in community housing and 5.6% in SOMIH). This represents just 1,760 of all main tenants in public housing households (1,662 & 250, respectively), steadily declining from between 7% up to 21% in the previous 5 years (see Table 1) (Housing NSW, 2014).

Table 1: Young people aged 25 or under (24 for community housing) as main tenants in NSW between 2008 and 2012

	2008/09 (n = 130,028) ¹		2009/10 (n = 136,843) ¹		2010/11 (n = 140,425) ¹		2011/12 (n = 141,864) ¹	
Public housing (n)	117,228		114,469		111,254		111,622	
Total > 25, main tenant (n/%)	2,227	1.9%	2,060	1.8%	1,891	1.7%	1,897	1.7%
Community housing (n)	16,639		18,233		24,904		25,844	
Total > 25, main tenant (n/%)	1,048	6.3%	1,312	7.2%	1,643	6.6%	1,369	5.3%
SOMIH (n)	4,101		4,141		4,267		4,398	
Total > 25, main tenant (n/%)	266	6.5%	277	6.7%	277	6.5%	263	6%

¹Total households living in social housing (Housing NSW, 2014)

As of June 2015, there were 59,035 applicants on the wait list for all social housing properties in NSW. Of these, 3,692 were on the priority wait list and 55,343 were on the general wait list (FACS, 2015). Unless young people can show that they fall within one of the priority groups, they are added to the general wait list.

Currently applicants are prioritised and seen to be in greatest need if at the time of allocation they are subject to one or more of the following circumstances (Australian Government, 2008):

- Homelessness;
- Their life or safety is at risk in their accommodation;
- Their health condition is aggravated by their housing;
- Their housing is inappropriate to their needs; and/or
- They have very high rental housing costs.

Issues such as relationship and/or family breakdown, domestic and family violence (DFV), substance use and addiction, low income or unemployment, lack of affordable housing and mental issues are cited as common reasons young people fall into homelessness. Only two of these factors fall under the current priority criteria, homelessness and DFV.

Young people therefore seem to be stuck in a catch-22 housing crisis where they are sent to the back of the queue for social housing unless they are already experiencing either homelessness or DFV. This instability in their lives prevents them from joining the workforce in anything like a consistent manner and establishing a career, it prevents them from either undertaking or successfully completing further study and disengages them from their community and society more generally.

Indeed, in 2009, nearly two-thirds (63.2%) of main tenants aged 24 or under nationwide were classified as being in greatest need at the time of allocation. Of those, 58% had a greatest need reason of homelessness. This was higher than for those households where the main tenant was aged 25 or over, at 44.9% (Australian Government, 2010). Further, almost half of all households (46.2%) with a young main tenant (24 years or under) were sole parents. In comparison, only 19.6% of households with a main tenant aged 25 years or over were sole parents (Australian Government, 2010).

Households with a main tenant aged 24 or under had the lowest proportion of households with a main income source from wages of less than 1 in 10. Conversely, almost 9 in 10 of those households had a main income source of government payments (Australian Government, 2010).

The current wait times for a one-bedroom flat/studio (see Table 2) make the current situation unsustainable, economically as well as socially.

Table 2: Current waiting times for housing in NSW (FACS, 2015)			
	Priority List (n)	General list (n)	Wait time (2015)
Sydney	392	1,663	5 to 10 years
Bankstown	72	2,819	5 to 10 years
Campbelltown	78	1,755	5 to 10 years
Kiama	4	48	5 to 10 years
Penrith	167	1,849	5 to 10 years
Gosford	48	1,422	5 to 10 years
Port Macquarie	21	645	10 years +
Byron	28	118	10 years +
Albury	26	601	2 to 5 years
Dubbo	8	514	2 to 5 years
Orange	9	275	2 to 5 years
Port Stephens	2	138	10 years +

Similarly, young people face significant barriers to joining the private rental market due to high costs, lack of rental history, discrimination, inadequate government support, limited savings and low income or unemployment, which inevitably forces those with no alternative into homelessness.

Whilst we cannot determine statistically how many young people face discrimination at the point of applying for rental properties, we know anecdotally that young people find it difficult to access the market and that they are disproportionately represented in the 'shared housing' demographic, either through choice or through necessity. We also know that young people can experience exploitation by unscrupulous landlords and that they often feel unwilling to assert their rights because they perceive their housing situation as precarious.

In their June Quarter rental report, Domain reported that Sydney tenants experienced a sharp rise in unit rents with median rents increasing from \$520 to \$525 per week (only \$5 less than median house rents). They also reported tight vacancy rates in the majority of Australian capital cities (Wilson, 2016a). In the same quarter, average fortnightly rents for

one-bedroom apartments in NSW equate to up to 198.8% of net income (from government assistance) (see Table 3).

Table 3: Rent vs. Net Income (Youth Allowance & Rent Assistance) in a sample of urban and regional areas in NSW for June 2016 quarter

Suburb	Median fortnightly rent ⁱ	Net fortnightly Income after rent ⁱⁱ	Weekly rent as a % of fortnightly income
Sydney	\$1,120	\$-556.80	198.80%
Bankstown	\$596	\$-32.40	105.80%
Campbelltown	\$580	\$-16.40	103%
Hurstville	\$800	\$-236.40	142%
Penrith	\$500	\$63.60	88.8%
Gosford	\$550	\$13.60	97.6%
Wollongong	\$550	\$13.60	97.6%
Byron	\$760	\$-166.40	134.8%
Albury	\$330	\$233.60	58.6%
Armidale	\$366	\$197.60	65%
Dubbo	\$440	\$123.60	78%
Orange	\$420	\$143.60	74.6%

ⁱ Median weekly rent for new bonds for one-bedroom apartments – June Quarter 2016 (FACS, 2015)

ⁱⁱ Net income is based on the total of Youth allowance payment based on someone who is 18 years older, with no children, who is living outside the family home (\$433.20 per fortnight); and Rent Assistance assumed to be at the maximum rate of \$130.60 per fortnight. This means the total net income per fortnight is \$563.60 before rent

This increase follows on from a sharp increase over the March 2016 quarter, with the median unit rent recorded at \$520. This increase equated to a 4% increase in median unit rents over the year (second only to Melbourne with a 4.1% increase) (Wilson, 2016b).

Difficulty in accessing the private rental properties is further exacerbated by high demand. In 2013/14, 31% of the population lived in rental accommodation. Of those 26% rented privately and 4% rented from housing authorities (ABS, 2015).

A combination of one or more of these, together with no family ties or support, inevitably forces young people into a cycle of poverty and homelessness.

Scope of this Review

IPART has been asked to consider the rent setting framework for social and affordable housing that improves incentives for workforce participation. Such a review is broad enough in itself, as can be seen from the fact that the issues paper focusses largely on social housing. Arguably most of another paper could be written on incentives for workforce participation in an affordable housing context. However, the review is not self-contained; for the majority of social housing tenants support to enter the workforce is needed and rent settings must align with support. Thus, IPART's review should be aligned with broader issues of workforce participation itself.

Further broadening the scope of the review is the fact that IPART has also been asked to consider eligibility criteria and policies on prioritising access to social and affordable housing. The above background information shows some of the complexities involved in this for a youth and social housing context. Other social housing cohorts will have their own complexities. These issues should be considered first and then inform, along with information on needed support, the investigation of rent models.

For these reasons we agree with the recommendations in the submissions of NCOSS, Homelessness NSW and Shelter NSW that further time be given for the process of consultation and that the process include panel of experts made up of representatives of peak bodies, academics with expertise in social and affordable housing rent models and relevant government agencies.

Recommendation 1: Organisations and interested parties should be given an adequate amount of time to consider and review the issues presented to them and to formulate a well thought-out and viable submission.

Recommendation 2: Consideration should be given to staging the review with eligibility and priority for social housing addressed first, followed by the review of rent models.

Recommendation 3: A panel of experts made up of representatives of peak bodies and relevant government agencies and academics with expertise in social and affordable housing rent models should be established.

People in and Issues with the Current System

Question 1: How should the safety net and opportunity tenant cohorts be defined? Are there additional cohorts or sub-cohorts with distinct characteristics and needs?

As positive aspect of the proposed categorisation of social housing tenants into “safety net” and “opportunity” cohorts is its recognition that many social housing tenants will require access to social housing on a long-term or permanent basis.

However, we are also concerned that defining tenant groups by the terms ‘safety net’ and ‘opportunity’, might result in stereotypes and generalisations, and pigeon-hole tenants into inappropriate classifications based on inappropriate criteria. For example, we would argue against tenant cohorts being categorised based on their age. There should be no assumption that someone who is young, for example, is fit and able to work and therefore should form part of the opportunity group. Individual circumstances must be taken into

consideration. Complex trauma, for example, can impact on an individual's ability to find and remain in employment without adequate trauma-informed care and so they may need extended support at first (thus falling within the currently defined safety net group) and once at a certain point on their road to recovery be able to transition to the 'opportunity' group.

The cohort categorisation raises a large number of questions: Which criteria will inform decisions on which group to place tenants in? Who will be making these decisions? To what extent will the aspirations of social housing tenants be considered? To what extent will individuals have a say in which group they consider themselves?

In practice such a categorisation scheme would be highly subjective and unlikely to accurately predict which individuals will in fact be in a position to embark on a particular pathway. Since it seems that different rental models will be offered to the different cohorts it would make more sense to categorise people by the model most suited to them. Given the complexity of determining which model is most suitable and the strong danger of failing to align with individuals aspirations, a straightforward solution would be to allow social housing tenants to elect which rental model best suits their aspirations.

As mentioned above the rental model must align with the support given. So social housing tenants would be able to opt for one of a number of packages of support and aligned rental model. Some of this diversity already exists in the community housing sector and should be introduced into the public housing sector.

Recommendation 4: Social housing tenants could be categorised not by arbitrary cohorts, but by the support and rental model that best suits their own aspirations.

Question 2: Are there any other issues with the current social and affordable housing system in NSW that are relevant to designing the eligibility criteria and rent-setting framework?

The following issues would be well worth considering when designing eligibility criteria:

Intergenerational Disadvantage

As at 30th June 2009, there were 45,407 young people who had been in the same public rental housing or SOMIH household since birth. This represents 17.1% of all young people housed (exclusive of community housing and those who have transferred within public rental housing or SOMIH). Further, more than three quarters of these young people lived in households that reported receiving government payments as their main source of income (78%) (Australian Government, 2010).

The goal here should be to limit the transmission of intergenerational disadvantage to ensure that those young people who have been living on the breadline while at home are given the opportunity to thrive and succeed.

These young people should be given the option to move into affordable housing particularly where there are employment and job opportunities. In many areas of the state where there is employment growth, the rental market has become less affordable creating a significant challenge to transitioning out of social housing.

Recommendation 5: Considering intergenerational disadvantage in eligibility criteria could help break the cycle of disadvantage and poverty by giving intergenerationally disadvantaged young people greater access to affordable housing.

A Right of Return

An analysis of public rental housing and SOMIH tenants' movements was conducted between 2003 and 2009 to better understand their profile of assistance. Between those dates, 13,729 people left public rental or SOMIH and returned in a year later. This represents 6% of all people exiting between 2003 and 2009.

Among the tenant cohort assisted on multiple occasions, young people are overrepresented. About half of people returning were aged 24 years or under (50.6%), and more than 1 in 10 were living in a household where the main tenant was aged 24 years or under (14.5%). Of those people returning as a main tenant, 16.2% were young people aged 24 or under (Australian Government, 2010).

Part of the journey towards independence for many young people is experimenting with independent living. These experiments may not always work out. It is common for a young person, when transitioning towards independence, to move out of the family home into their own accommodation, only to find that it was not quite what they were looking for, or that they did not connect well with flat mates rendering the living situation unworkable. During this transition, therefore, having family support to fall back on is essential.

For young people from disadvantaged backgrounds, returning to social housing does not represent a failure to transition successfully into independent living but is part of the process of establishing themselves. When a young person hasn't got connections or family ties to fall back on, they can find themselves at the back of a very long queue. The prospect of this provides a significant disincentive to experiments with moving out of social housing. These young people need a 'right of return' to social housing, removing the disincentive to leaving social housing and giving them a safe place from which to try again.

Recommendation 6: Introduce a 'right of return' policy for young people who are returning to social housing from the private rental market.

User-choice in social housing

The current framework severely limits a tenant's choice over which social housing property they might call home. Once applicants reach the top of the wait list, they are generally allocated an available home based on their preference for the area in which they would like to be housed and the characteristics of the household such as the number of people and need for a particular type of property. The suitability of housing is therefore, by and large, down to luck and timing. Tenants cannot reject more than two, and in some cases one, without being sent to the bottom of the wait list.

The limited scope for social housing tenants to choose their own home affects the responsiveness of the social housing system to meet the needs and preferences of tenants and has flow-on effects on the quality and efficiency of the system. It can also constrain a tenant's ability to make independent and informed decisions on, for example, where to send their children to school, which hospital to access, transport links and which food outlets and shopping centres to frequent.

The Netherlands and the United-Kingdom have implemented user-choice models, known as the Delft Model (Productivity Commission, 2016):

"Available social housing properties are advertised in newspapers and online,

along with eligibility requirements such as income level and household size. Eligible applicants bid for the listed property and are ranked against published selection criteria such as waiting time, applicant age and time spent in their current premises. The applicant with the highest ranking is offered the property, and the qualifications of the successful tenant are published so that unsuccessful tenants can check if the successful applicant indeed had a better application. A small number of people are directly allocated properties for social reasons, including health problems arising from to their housing situation, homelessness, catastrophic circumstances or clearance due to urban renewal."

Such a framework in Australia would allow individuals the freedom to make informed decisions and to have conscious control and choice over their lives. It might also reduce the number of complaints within the social housing sector, and limit the number of current tenant transfers to more suitable properties.

However with already long and increasing wait times for social housing, there are concerns surrounding the negative impacts being passed over for housing time and time again might have on individuals. When a potential tenant bids for a property, they are likely to be doing so because the property meets their needs and are have their heart set on that property. While one, two or even three rejections might be understandable and manageable, individuals are likely to become disheartened if they are turned down an indefinite number of times. Thought will need to be given to how the process is managed and controlled so as to be workable.

Recommendation 7: Trial introducing user-choice into social housing, not only improving the responsiveness of the social housing sector but also, giving young people the opportunity to have a say in where they want to live, work and settle.

Our Proposed Assessment Criteria

Questions 3 & 4: Do you agree with our proposed assessment criteria for the review? Are some criteria more important than others, and why?

Yfoundations broadly agrees with the criteria, but in some cases further nuance is required:

Incentives for workforce participation

The assertion that certain rent models and government payments are a disincentive to tenants participating in the workforce is far too simplistic and fails to get to the root causes of long-term unemployment. The reality is that the many factors that contribute to an individual's employment status and social exclusion are complex and interwoven. Individuals may not have the relevant qualifications or experience for full-time, permanent employment and are forced into the casual and contract work markets. Where individuals are skilled, applications to jobs are competitive and positions few and far between. Young people need to be provided with access to support, training and other careers assistance programmes. The rental model should align with the support. An example of this principle is in the design of the Transitional Housing Plus program. This program is for those who wish to enter the private market. As well as support to engage with education and employment the rental model gradually steps up to near average private rent in the area. Thus the intention to enter the private market is embedded in both the support and the rental model.

Flexibility and choice for tenants

The social housing portfolio in NSW and Australia more broadly is small, especially when compared to portfolios in other developing countries. For example, social housing comprises around 18% of the rental housing market in the United-Kingdom (Whitehead, 2007). The small number of available housing will make user-choice difficult to implement and sustain in the long run.

Impact on financial sustainability of the social housing system

We would challenge the notion of financial sustainability within the public housing sector. The aim of social housing has always been to guarantee a decent home at a reasonable rent to the poorest in our society. Social housing tenants are more often than not unable to pay market rent and so a system where costs and rent are aligned loses sight of the basic premise of social housing and is, put simply, unrealistic.

Coupling this with the small size of Australia's social housing sector puts into perspective the need for the government to further invest in social housing and subsidy funding arrangements to cover the shortfall. Australia's social housing sector is small when compared to other developing countries. For example, in England and Wales, there were 4,030,000 socially rented properties in 2015 (HM Government, 2016). Comparatively, there were 418,157 social housing properties in Australia in 2009 (AIHW, 2010). Given Australia's population is just over a third of that of the UK, it raises the question of why we have only a tenth as many social housing properties.

Preliminary Options for Eligibility Criteria and Priority Policies

Question 5: Is it appropriate to more narrowly define the eligibility criteria for social housing to target people with the greatest need for this form of housing assistance? If so, how should the target group be defined?

We believe that it would be short-sighted and counter-intuitive to restrict the criteria further simply because the state's supply does not meet current demands. We also contend that young people under the age of 25 will be the most adversely affected by such a narrowing as – given what we know about their high access rates to SHSs and their limited access to social housing – they are one of the largest cohorts in need of housing.

People who are currently on the wait list – whether priority or general – have a genuine need for housing which won't simply evaporate once the criteria are narrowed. While altering the criteria might alleviate some of the immediate strain on social housing, this will have a knock on effect and create problems elsewhere. Already underfunded specialist services will see demand for their services increase. Thousands of individuals with no recourse will struggle to make ends meet. Individuals will be forced to move to more affordable, rural areas of the state – potentially leaving jobs behind – where there are limited employment and further education opportunities.

Social housing tenants tend to have higher employment rates and incomes than applicants for social housing, which reflects the positive effect that stable personal circumstances can have on employment. Recipients of social housing support have reported that they are in better health, are able to improve their employment situation and have better access to the services and supports they need once settled in stable accommodation (AIHW, 2015a).

That 20,000 people per year apply and are approved for social housing in NSW highlights a much broader problem within our society. Demand for rental properties is high and rental prices in the private market have been increasing steadily each quarter, to a total of 4.1% between June 2015 and June 2016.

Compounding the problem is the current insecurity in the labour market. Unskilled and semi-skilled employment opportunities have declined while contract work, and part-time and casual employment have increased. As at November 2013, casual employees made up 23.9% of the workforce. Casual employees are younger than permanent employees, with 39.3% of all casuals aged less than 25 years of age (compared with 11.6% who are permanent). A further fifth of all casuals are between the ages of 25 to 34 (Kryger, 2015).

Early intervention strategies to help young people in unstable family circumstances or unstable housing do not start early enough, with thousands of young people slipping through the net or offered help after having already disengaged from their school, community and family.

It is clear that there is a serious shortfall in the number of social and affordable housing properties, something that needs to be addressed as a matter of urgency. However attempting to improve system viability through further excluding the poorest, or indeed through rent reform, won't help to address or rectify this shortfall. What is needed is not a more narrowly defined eligibility criteria but comprehensive early-intervention strategies, starting in primary school, to create pathways to independence from an early age. Research has shown that investments in human development in the first few years of a child's life has a strong impact on cognitive development, school performance, productivity, income, and health and nutritional status over the life course (Ghuman et al., 2005). In addition, access to much more affordable housing, especially for those in the very low and low income bands, increased rent assistance and continued support for individuals seeking to transition into independent living.

Recommendation 8: Focus on early intervention and the provision of affordable housing for those on very low and low incomes, rather than an untenable narrowing of the assessment criteria for social housing.

Question 6: What alternative assistance would be most effective for those applicants for social housing who meet the income threshold but do not have priority need for housing?

Low-income young people who do not fall within one of the priority categories should be given better access to more affordable housing. As at June 2014, there are very few affordable rental houses aimed at those with very low or low income, 2.4% and 7.3% respectively of the affordable rental stock in Sydney. Conversely, 39% of stock is available to those with moderate incomes (set at \$59,900) (FACS, undated). This affects young people negatively because their incomes are generally lower. In 2010/11, young people (defined in this case as aged between 15 and 34 years of age) who lodged tax forms reported average income from wages of \$40,055, narrowly above the low income bracket (set at \$40,000) and well under the national average of \$51,923 (ABS, 2013). It must be borne in mind that this average excludes those who did not file any tax forms, such as those on incomes of less than the tax-free bracket. As at June 2011, the median age of tenants in affordable housing in North Sydney was 38.4 years of age. Despite being in greatest need of affordable housing, it is simply not accessible for many young people.

Rent assistance could also be increased to help young people feel more secure within the private rental market. Currently, a single young person is entitled to \$130.60 a fortnight rent assistance provided they meet the minimum rent threshold of \$290.33 (to receive the maximum payment). With private rental properties already stretching tenants thin, rising rental prices and limited job opportunities, the current rate is simply not high enough to provide young people with the security that they need to establish themselves and transition towards independent living.

The government should also make a point of ensuring that their housing stock is used and assigned in the most efficient way possible. Currently, there is a mismatch between the housing stock and tenant need. Roughly half of all social housing applicants are single adults whereas the majority of housing stock is geared towards the needs of families. Housing NSW has estimated that under-utilisation of properties in NSW equates to a rent loss of about \$25m per annum. This is the equivalent to the recurrent cost to government of providing public housing for about 3000 households. Young people under the age of 25 could be share-housed together in these larger, family-sized properties.

This would need to be rigorously evaluated. The criteria for young people being encouraged into shared housing would need to be considered. At the very least those with special needs and disabilities, those experiencing complex trauma as a result of domestic and/or family abuse, and young people with children would need to be excepted. Support should also be given to those living within the shared house to ensure that harmony is established and maintained, such as workshops on shared living and mediation services in the event of conflict.

Recommendation 9: Alternative assistance for those who do not have a priority need for social housing include increased access to affordable housing for young people, increased rent assistance and the efficient use of housing stock. [split]

Questions 7 & 8: Should people receiving housing assistance have their eligibility for assistance reviewed as their circumstances change? What are appropriate transfer policy settings that take into account the principles of equity, and costs of transfers as well as the benefits?

We would advocate for the trial and evaluation of a voluntary system whereby those whose circumstances have changed are asked whether they might be willing to move into property more appropriate to their current circumstances and needs. 'Sweetening the deal' could encourage participation in the scheme for tenants, for example, through rent abatements or better transport links.

It would be very difficult to implement a compulsory framework that is consistent yet fair. While, in certain circumstances, it might be acceptable for tenants to have their eligibility for assistance reviewed when their circumstances change, care must be taken to ensure that individuals are not worse off as a result of the review. Plucking people away from their community, especially if they have resided in that particular area for a number of years, could cause considerable distress (unless with express agreement). Individuals would be leaving their friends, family doctor and security behind. Therefore, if a move is considered viable this should be a move to a more appropriate property within the same community area.

Personal circumstances would also need to be taken into account. Households that do not own a car should not be forced to move into a new property with poor transport links, especially if their previous home provided them with good links. They should similarly not be housed further away from convenient access to supermarkets. For tenants in

employment, any move should not unreasonably increase the time it takes for them to get to and from work, nor should any move make it more difficult for them to get to and from work (e.g. having to take three trains rather than one).

Further consideration should be given where there are young people under the age of 18 living in the property being reviewed. They should have a tenant advocate assigned to them to ensure that they understand the reason and process behind the review, and also to ensure that the young person's opinion and feelings on the matter are not overlooked. The same could be said of individuals caring for elderly parents, both inside and outside the home. Put simply, the wellbeing of all those living in the property must be taken into consideration, not just that of the lead tenant.

We would also recommend on-going trauma training for staff reviewing individual cases and making any decisions relating to the reassessment, especially where vulnerable tenants are concerned. There have been incidences, for example, of victims of sexual assault being moved into apartment buildings also housing their perpetrator.

There are undoubtedly also other factors not covered here that would need to be taken into account to avoid worsening the situation of vulnerable social housing tenants. We feel that in practice taking into account all the relevant factors would be a sufficiently complex task that it would be overly burdensome on housing providers and likely to lead to mistakes. For these reason a voluntary system where tenants judge their own circumstances, is more likely to be both equitable and effective.

If a compulsory transfer system is introduced it is important that it be transparent and reasonable. Where the housing authority intends to review a tenant's eligibility for assistance, they should be given reasonable notice of this intention, as well as the opportunity to appeal any decision made. At this stage, tenants should be given adequate notice of their moving date. We would recommend 4 weeks. Tenants should receive financial assistance for their relocation costs including electricity, water and gas connection fees, telephone and internet reconnection fees and reasonable removal expenses.

Recommendation 10: The trial and evaluation of a voluntary system whereby those whose circumstances and eligibility for certain properties have changed, are given the choice to move.

Question 9: Is the current income threshold for eligibility for public housing lease renewal set at the appropriate level? What are the pros and cons of reducing this threshold?

A flat income threshold for eligibility for social housing can lead to inequity. In areas of very high rents some people may be unable to access the private market due to its expense, but are still ineligible for social housing. In other areas, those who could afford private rental may be eligible for social housing.

To be considered affordable, rent should be no higher than 30% of gross income. Table 4 highlights the differences in median weekly rent for one-bedroom flats across NSW. In rural NSW, median weekly rent is as low as \$123 while in Sydney median weekly rents are \$560. With this in mind, a \$944 income threshold review for a single adult household may seem either over or under-generous depending on individual circumstances and mandatory outgoings (e.g. rent, bills and food shopping).

We have calculated what a young person's gross weekly income would need to be in order to pay no more than 30% of that income on median rent (see Table 4). In more rural parts of NSW, individuals assessed on the flat rate of \$944 could be earning enough to be living comfortably and without rent stress in the private rental market. As an example, in Armidale, where the median weekly rent for a one bedroom flat is \$183, someone earning say \$950 (just above the threshold for eligibility for lease renewal) gross weekly would be paying 19.3% of their income towards rent. Conversely, someone in Sydney would be paying 59.3% of their income towards rent.

Table 4: Median weekly rent as a percentage of gross weekly income

	Median weekly rent (one bedroom) ¹	30% of what gross weekly income
Sydney	\$560	\$1,866
Bankstown	\$298	\$993
Campbelltown	\$290	\$966
Hurstville	\$400	\$1,333
Penrith	\$250	\$833
Gosford	\$225	\$750
Wollongong	\$225	\$750
Byron	\$380	\$1,266
Albury	\$165	\$550
Armidale	\$183	\$610
Dubbo	\$220	\$733
Orange	\$210	\$700

¹ Median weekly rent for new bonds for one-bedroom apartments – June Quarter 2016 (FACS, 2015)

At first glance, it would make sense therefore for the lease renewal threshold to be set according to the weekly median rent prices for each area. It seems inherently and fundamentally unjust that individuals in rural areas of NSW should be better off in the public housing sector compared with individuals living in built-up, more expensive areas.

However, such a proposal would need to be carefully evaluated primarily to ensure that such a geographical reduction in the threshold does not turn into a disincentive to join the workforce or indeed, to continue in employment in rural parts of NSW. It should also be considered whether there are expenses and costs unique to living in rural parts of NSW that justify the high threshold despite lower rent prices such as, for example, the cost of owning a car vs. the cost of public transport. In Sydney, for example, transport links are generally speaking good and well priced while they are virtually non-existent in rural parts of the state. Thus individuals living in rural parts of NSW might benefit from lower rent but bear the burden of additional costs such as owning a car, insurance, petrol and car repairs/services. Conversely, those living in more metropolitan areas might have higher rents but lower or no (for those who walk/cycle) transport costs.

It should also be assessed whether individuals living in rural parts of the state have access to housing within the private rental market. If individuals living in these areas are assessed against a lower threshold based on the median rent for that area but are unable to find suitable accommodation because there simply isn't anything available, this would act as a further disincentive to joining the workforce. Otherwise, individuals might find themselves back to square one: homeless and at the bottom of the wait list for social housing.

In built-up areas of NSW, given the large disparity between median weekly rent and the current eligibility threshold of \$944, it can be argued that the disincentive to join the workforce is already firmly in place. The supply and demand of private rental properties in rural areas of NSW will also need to be assessed.

It is not unusual for young people under the age of 25 and transitioning towards independent living, to enter into shared housing while either studying or working. Rental prices for one-bedroom units are by and large too high for single young people, on an entry level salary, to manage on their own and young people should be encouraged to save a proportion of their income for the future, for example for getting on the property ladder.

In addition, increasing the lease renewal income threshold to, for example, \$1,866 in Sydney would be grossly unjust, as someone with a gross income of over \$97,000 would be entitled to remain in social housing.

An alternative, where young people under the age of 25 are concerned, would be to reduce this threshold to 30% of the gross weekly income for the median rent based on shared housing with two or more bedrooms (see Table 5). The greater the number of bedrooms, the lesser the stress on gross income and the more the threshold for eligibility can be reduced by.

Table 5: Median weekly rent as a percentage of gross weekly income

	Median weekly rent (two bedrooms) ¹	30% of what gross weekly income
Sydney	\$685/2 = \$342.5	\$1,141
Bankstown	\$380/2 = \$190	\$633
Campbelltown	\$300/2 = \$150	\$500
Hurstville	\$400/2 = \$200	\$666
Penrith	\$290/2 = \$145	\$483
Gosford	\$330/2 = \$165	\$550
Wollongong	\$320/2 = \$160	\$533
Byron	\$430/2 = \$215	\$716
Albury	\$210/2 = \$105	\$350
Armidale	\$230/2 = \$115	\$383
Dubbo	\$235/2 = \$117.5	\$391
Orange	\$240/2 = \$120	\$400

¹ Median weekly rent for new bonds for two-bedroom apartments, based on two people sharing the rent – June Quarter 2016 (FACS, 2015)

While theoretically this appears to be a straightforward and logical solution, it would need rigorous evaluation before being considered a viable option. The criteria for young people being encouraged into shared housing would need to be considered. At the very least those with special needs and disabilities, those experiencing complex trauma as a result of domestic and/or family abuse, and young people with children would need to be excepted.

Demand for these properties is also very high and such a framework would need to be based on availability. The transition is also more likely to go wrong due to clashing personalities and conflict within shared housing. Without family support to fall back on to, young people may find themselves back where they started, either in the streets or in social housing.

Recommendation 11: Evaluation of income threshold for eligibility for public housing lease renewal set at a rate which is commensurate with the median rent in that given area.

Question 10: Is the order in which clients are currently housed appropriate?

The order in which clients are housed should be based on their level of vulnerability, and youth should be a factor in assessing vulnerability. Young people under the age of 25 are at a vulnerable time in their life. According to the World Health Organisations (WHO, undated) adolescence is a physical, social, emotional, cognitive and behavioural growth period of life, representing one of the critical transitions in the lifespan second only to that of infancy. It is a period of preparation for adulthood during which time several key developmental experiences occur. It is a time when behaviours are established, many of

which are sustained across the lifespan. Young people choose a career path, develop their skills and competencies, establish an identity and obtain greater responsibility and independence. It is also a time of considerable risk during which social contexts exert powerful influences. The WHO has acknowledged and classed adolescents as a vulnerable group within their framework but this has not been recognised within the social housing sector.

Further, the AIHW (2015) defines vulnerable young people as those aged 15 to 24 who are at risk of harm, have been harmed, or have limited social, educational or economic opportunities.

We know that social housing tenants are in better health, are able to improve their employment prospects and have better access to education and training opportunities and services and support once settled in stable accommodation. We also know that very few young people will get another shot at a good start at this pivotal time in their life. Sadly, those who slip through the gaps at this vulnerable time, are more likely to get into trouble with the police, more likely to receive government supplements, less likely to remain in stable employment or stay in school/further education and are under increased risk of exploitation, violence, victimisation and DFV.

Young people do not receive anywhere close to the proportion of social housing that might be expected given their level of need and their vulnerability and their numbers. Nor are they listed in the priority order list under which social housing is generally allocated. The UN Special Rapporteur on the Right to Housing has challenged governments across the globe to make the elimination of homelessness a top human rights priority with particular attention on youth. We would advocate for young people being housed on a priority basis, perhaps alongside the elderly, on the sole basis of their age and not because they have fallen victim to violence or homelessness.

We believe that it makes the most sense, economically as well as socially, to invest in our young people as early on as possible to put them on the path to independence and stability.

Recommendation 12: Recognition within the social housing sector of the vulnerability of young people as a result of their age, and their inclusion in the order of priority in which tenants are housed.

Preliminary Options for Rent Setting Framework

Question 15: Is a segmented rental framework appropriate for social housing? Could it also be applied to affordable housing?

Caution should be taken in implementing a segmental rental framework. The issues paper provides that this framework may involve segmenting rent based on membership to a particular tenant group, either the 'safety net' group or the 'opportunity' group. As noted above this raises questions such as which criteria will inform decisions on which group to place tenants in, or who will be making these decisions. In addition, to what extent will individuals have a say in which group they consider themselves to be? If tenants do not agree that they should form part of the 'opportunity' group, what avenues will be made available to them to challenge such a decision? As noted above allowing individuals to select the rental model that aligns with their aspirations.

Recommendation 13: If a segmented rental framework is introduced, social housing tenants must be given self-determination in selection their model for their tenancy.

Question 16: Should a tapered subsidy model be considered for social housing and affordable housing in NSW? If so, should it only apply to a segment of the tenant cohort?

A good example of the tapered subsidy model is the Transitional Housing Plus program. Early indications suggest positive outcomes for the model however we would strongly advise against recommending it until it has been properly evaluated.

For example, a perceived benefit of Transitional Housing Plus is that it factors in variations in housing markets by providing rent tables for standard and lower market rent areas. This may well provide an incentive for young people to live in lower-cost areas. It might, however, be counter-intuitive and undermine the purpose of the model to provide support to people to enter the workforce and transition into the private rental market and towards independence. Lower housing markets generally offer fewer work opportunities and have a less developed, or non-existent, transport infrastructure making travelling outside of your area difficult unless a car owner.

Recommendation 14: Positive early indications with regard to a tapered subsidy rent-setting model however we would advise against its recommendation until it has been fully evaluated.

Question 17: Should social housing properties be able to transition to affordable housing?

The Affordable Housing Act 1980, passed into law in the United-Kingdom under Margaret Thatcher's Right to Buy initiative, gave social housing tenants just that: the right to buy the council home that they had lived in for the previous three or more years. While giving thousands of people the opportunity to become homeowners and in turn have a stake in their own development was a noble idea, it was lacking in foresight as to the availability of social housing and the future of the next generation. Not only did the initiative flog valuable government assets at a fraction of their market value, it resulted in a reduction of available social housing from which the UK has still not recovered.

While in theory a plausible solution, it is simply not viable in practice. With 59,035 people on the wait list for social housing as at 30 June 2015, for every transition to affordable housing, there would need to be one similar social house added to the government's stock of social housing. The majority of tenants want housing in well-built up areas where there is access to employment and training opportunities, but where land is scarce for the construction of new housing. Where there is land, it is seldom cheap.

If social housing properties are able to transition to affordable housing properties, the government would need to set out a framework by which they will meet the needs of those on the wait list for social housing.

Recommendation 15: Before transitioning social housing to affordable housing, there will need to be a clear outline of how the government intends to add to the social housing portfolio and meet the needs of the population, at a time when wait lists for social housing are growing.

Question 20: If an income-based rent model is retained, should the percentage of household income used to calculate social housing rent be changed?

To be considered affordable, rent should be no higher than 30% of gross income. The current rate of 25% of an individual's assessable income or the market rent, whichever is lower, is fair and acceptable to us.

Question 22: If an income-based rent model is retained, should currently exempt income supplements be included in assessable household income?

We do not think that currently excluded income supplements should be included in assessable household income. Most income supplements are given to address a specific disadvantage and are, in theory, calculated to be an amount that addresses that disadvantage. Taking away a percentage of a supplementary payment makes it inadequate to address the need it is intended to.

Recommendation 16: the percentage of household income used to calculate social housing rent should not be changed and currently exempt income supplements should not be included in assessable household income

Question 23: In an income-based rent model is retained, should income from work be assessed on an after-tax basis?

We would advocate for income from work being assessed on an after-tax basis. On the whole, this would be the most equitable way of calculating rent, as it is effectively an individual's net income that makes up their disposable income. This would also put the public housing sector on the same terms as the private rental sector. When private renters make a decision about what it is they can afford to spend on rent costs, they make this decision based on their net income, the money that is readily and immediately available to them.

As Table 6 illustrates, where rent is assessed using an individual's gross weekly income, tenants face paying up to an additional \$34.87 rent per week, based on the assumption that 25% of a tenant's income will be charged to rent. This equates to an additional \$1,813.24 per year of an income reduced by a \$2,420.60 tax bill. Thus, an individual earning \$30,940 gross will be \$4,233.84 worse off per year if rent is assessed prior to tax deductions.

Table 6: Weekly rent as a percentage of gross weekly income

Gross Yearly Income	Gross Weekly Income	Net Weekly Income	Tax Paid	Difference in weekly Rent (set at 25% of income)
\$30,940	\$595	\$548.50	\$2,420.60	\$34.87
\$25,000	\$480.77	\$456	\$1,292	\$6.19
\$20,000	\$384.60	\$342	\$378	\$10.65

Recommendation 17: In an income-based rent model income from work is best assessed on an after-tax basis.

Question 25: What are your views on automatic deduction of rent? Are there other options to make rent collection more efficient?

As a general first point, we would contend that failure to pay public housing rent is not a priority problem in need of redress. In 2013/14, in NSW, there were 393 evictions because of failure to pay rent and 1,319 failed tenancies where there were problems paying rent (Wood, 2016). Given that there were 110,059 public housing households in 2012/13, this represents only 1.5% of total tenancies.

Notwithstanding this, we would argue against automatic deduction of rent from welfare payments for a number of reasons. First, it takes choice, autonomy and control away from the individual. Particularly for those in the 'opportunity' group where the goal is to set them on a path to independent living. Individuals should be given the opportunity to effectively and autonomously manage their finances given that there will be no automatic deduction of rent available to them in the private rental sector.

Secondly, if they are having difficulty managing their finances, this automatic deduction might leave them in a state of financial hardship, where they find themselves unable to pay for food or other important utilities.

Importantly, we know that the majority of young tenants aged under the age of 25 have cited government payments as their primary source of income (9 in 10 households). While

rent might be set at an affordable 25-30% of that income, this is in actual fact a large chunk of an extremely modest amount of money. The hard reality is that the majority of tenants in arrears are not shirking on their responsibility to pay for their rent, but are having to make tough choices week after week about whether to pay for their rent or, for example, buy essential medication or pay for another important utility.

This proposal is further counter-intuitive where individuals who do not have the necessary funds in their account to pay for other expenses and necessities might face significant overdraft fees from their banking institution, leaving them facing further financial hardship.

There is also no explanation as to what might happen if a young person's welfare payments are cut off and how this might be managed. Provisions will need to be put in place to ensure that a young person is not penalised further while they try to get their payments reinstated.

The current framework allows tenants to voluntarily either opt-in or opt-out of automatic deduction of rent. We would continue to support this system that provides young people with the opportunity to take charge of their life and have conscious choice and control over their actions.

For those young people who do have difficulty with managing their finances, an effective solution might also be to provide increased support, providing them with efficient and helpful ways to effectively manage their finances. This would be especially useful for those within the 'opportunity' group, whom we would like to see transition and importantly remain within the private rental sector and even go on to private ownership.

Another option – and commonly used in the private rental market – might be to introduce an incentive whereby those individuals who pay their rent early or on time are offered a rent abatement, say 5% to 10%. This would need to be rigorously evaluated to ascertain how sustainable this abatement would be for the public housing sector, in other words, would this abatement be more cost efficient to the public housing sector than the administrative and financial burden of either evicting tenants or pursuing rent arrears?

Recommendation 18: The continued use of voluntary options to opt in or out of automatic deduction of rent, as well as the trial and evaluation of rent abatements where rent is paid in advance or on time.

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