



How might the effectiveness of federal housing and homelessness spending be better measured?

HOMELESSNESS AUSTRALIA, 2014

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Executive Summary

In 2014 Homelessness Australia carried out qualitative research among its member organisations to elicit information that could inform the Australian Government and the Department of Social Services (DSS) on ways in which the effectiveness of its homelessness and housing spending could be better measured.

This paper considers accountability mechanisms in existing Council of Australian Governments (COAG) agreements on affordable housing and homelessness. It makes recommendations for improving those mechanisms' ability to deliver better outcomes for people who are experiencing homelessness (including those living in severely crowded housing) and for those at risk of homelessness.

Since the present measures of the effectiveness of that spending are contained in COAG's National Agreement on Affordable Housing (NAHA) and National Partnership Agreement on Homelessness, the paper is structured around those instruments.

The paper makes thirteen recommendations that focus on four areas; clarifying objectives, outcomes and indicators; transparency and stakeholder engagement; results-driven accountability - directing funding towards the achievement of outcomes, objectives and indicators; and data collection, collation and analysis.

Homelessness is a complex phenomenon, and the availability of housing in Australia is increasingly affected by global factors, including economic urbanisation, labour migration, population ageing and relaxation of foreign investment controls. Neither homelessness nor the present housing shortage is fully within Australian governments' control. Nonetheless, governments can be held accountable for the contributions of their own policies to those phenomena. At present, the NAHA's ambitions are not expressed to control housing taxation, and immigration decisions are made largely without an assessment of their impact on housing. These omissions must be remedied if progress is to be made towards the NAHA objective of affordable, safe and sustainable housing that contributes to social and economic participation for everyone.

The NAHA's 'aspirational objective' is that 'all Australians have access to affordable, safe and sustainable housing that contributes to social and economic participation'. However, it would be reasonable to assume that these outcomes be desired for all people resident in Australia.

To be effective, the NAHA must take account of resident population and population-level outcomes. When the NAHA refers to 'housing', it must mean well-located housing of a reasonable standard for the purposes of shelter.

Governments also need to cultivate a climate in which housing supply meets underlying demand,¹ including by matching natural population increase, as well as taking account of the specific needs of vulnerable people who are always likely to struggle to sustain housing in the private market. Housing ‘outputs’ that could be considered for the NAHA include;

- a Commonwealth housing strategy and similar strategies at the state/territory or major metropolitan levels² and/or for social or affordable housing in each jurisdiction³;
- housing impact statements for all major changes in other government policies that affect whether everyone resident in Australia can obtain shelter, particularly at the less expensive end of the market, and;
- Commonwealth, state and territory revenue policies consistent with this Agreement’s objective.

Some present NAHA ‘outputs’ could be re-purposed as indicators as most of the NAHA’s outcomes are associated with specific performance indicators. However, some of what the agreement misclassifies as ‘outputs’ are structured more like performance indicators.

The National Partnership Agreement on Homelessness (NPAH) and the National Partnership Agreement on Remote Indigenous Housing (NPARIH) were originally framed as ‘contributing to’ particular NAHA outcomes, respectively⁴ being people who are homeless or at risk of homelessness achieve sustainable housing and social inclusion [and], that Indigenous people have improved amenity and reduced overcrowding, particularly in remote and discrete communities. It is essential that governments do not lose sight of these agreed aims, which are yet to be realised. There has also been a drift in the NPAH’s original outcomes to be expressed in terms that are more modest.

Population or system outcomes must be framed, and accounted for, differently from agency or program outcomes. There is much value in retaining a set of national outcomes for homelessness. However, HA emphasises that, in the current fiscal environment, such outcomes should be clear, simple, referable wherever possible to existing data sets and practically achievable. The latter quality is more likely to be achieved with greater attention to the medium as well as the longer term.

¹ See the National Housing Supply Council’s unpublished 2013 [State of Supply report](#), chapter 1.

² In this context there is an urgent need to reconsider the role of local government in planning for globalised cities such as Sydney: see, for example, Lucy Turnbull, ‘[Housing Australia: not in my street](#)’, presentation to the HIA *Building Better Cities Summit 2014*.

³ eg in 2013 the NSW Auditor-General urged development of a state social housing strategy.

⁴ See NPAH 2008-2013 cl 13 (‘Objectives’) and NPARIH cl 12 (‘Outcomes’). NPARIH has its own ‘Objectives’ clause, which recites its establishment of a ‘ten year remote Indigenous housing strategy aimed at [achieving the following in remote Indigenous communities]:

- (a) Significantly reducing severe overcrowding...;
- (b) Increasing the supply of new houses and improving the condition of existing houses...; and
- (c) Ensuring that rental houses are well maintained and managed...

The Intergovernmental Agreement on Federal Financial Relations (IGAFFR) sought to increase public accountability for spending on outcomes agreed under it, by reference to defined outputs, performance indicators and benchmarks (see Appendix A). The most recent iteration of the NPAH recognises the large number of housing and homelessness initiatives delivered by the not-for-profit (NFP) sector and that progress cannot be achieved without co-operation from other parties.⁵ These other parties are not at the table when COAG agreements are negotiated. This is despite research demonstrating the importance of sharing accountability for solving homelessness between mainstream services (most of which are delivered by governments) and the specialist services that NFPs deliver.

Linking outcomes to funding can shift resources from service delivery to measurement with no offsetting benefit to programs, penalise prevention, development and other programs with harder-to-measure outcomes, promote 'creaming' (selecting participants who are more likely to succeed), inhibit innovation, punish risk-taking and discourage inter-program cooperation.⁶

Homelessness Australia (HA) anticipates consideration be given to the paper's recommendations and they be adapted into any new arrangements that emerge from the White Paper on Reform of the Federation and parallel COAG processes.⁷

⁵ The NPAH's revised objectives clause now refers to the desirability of partnerships with 'business, the not for profit sector and the community'.

⁶ Plantz, Greenway & Hendricks (1997) 'Outcome measurement: Showing results in the nonprofit sector' *New Directions for Evaluation* 75, pp15-30.

⁷ See [COAG Communique 10 October 2014](#).

Recommendations

Clarifying objectives, outcomes and indicators

Recommendation 1:

That the NAHA objective be reframed as follows:

Every resident in Australia has access to affordable, safe and sustainable housing that contributes to social and economic participation.

Recommendation 2:

That outcomes be specified for different targeted entities:

- a) system/ structurally
- b) government agencies
- c) programs
- d) services
- e) population (eg everyone being housed).

Recommendation 3:

That the NAHA outcomes be amended

- by replacing those in cl 7(b), (c) and (d) with the following:

People are able to purchase or rent housing of a reasonable standard that meets their needs for safe shelter and access to services and labour markets;

Supply of well-located affordable or social housing meets demand from people who need to occupy that housing

- by amending the outcome in cl (e) so that it reads:

all people entitled to reside permanently in Australia – including Indigenous people, children, young people, women, older people and single people – have the same housing opportunities, and other residents are not denied them without good reason.

Transparency and stakeholder engagement

Recommendation 4:

That governments consult with the homelessness sector about the proposed content of any intergovernmental agreements, partnerships or other instruments that permit or involve changes in homelessness policy, service delivery or funding, within timeframes that allow services (and, where relevant, their clients) to understand and prepare for those changes.

Recommendation 5:

That all COAG agreements, partnerships and associated instruments, including state implementation or project plans and reports required under them, be published *immediately* after they are entered into or take effect (whichever is applicable).

Recommendation 6:

That COAG agreements relating to housing or homelessness require that states and territories indicate in their Budget documents what elements of proposed housing and homelessness expenditure will be funded by:

- (a) monies obtained from the Commonwealth through an SPP or a NPA alone;
- (b) state or territory general revenue alone;
- (c) both Commonwealth SPP/NPA funds and state or territory general revenue, and the extent of each government's contribution;

and that, where state or territory funding is involved,

- (d) the extent to which the expenditure is funded by stock transfers, 'asset recycling' or redirection of program funds from other areas of housing or homelessness.

Results-driven accountability - directing funding towards the achievement of outcomes, objectives and indicators

Recommendation 7:

That future indexation of the NAHA SPP is tied to states and territories undertaking full housing needs assessments, based on their present and likely future populations.

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Recommendation 8:

That the Commonwealth (consider) offer(ing) additional incentive payments to expedite state and territory development or planning changes that will improve supply of well-located, low-cost housing, particularly housing that is suitable for single and older people.

Recommendation 9:

That the Commonwealth consider offering additional incentive payments to encourage adequate growth and distribution in social housing stock over defined periods of time, in each jurisdiction, to keep pace with population increases.

Recommendation 10:

That the Commonwealth consider re-allocating a proportion of the NAHA SPP to community housing providers for capital works via a competitive tender process that focuses on increased housing supply.

Data collection, collation and analysis**Recommendation 11:**

That governments accept the importance of:

- *regular 'SHIP' training for SHS staff that emphasises the importance of the SHSC data set for the sector and its clients (eg as a vehicle for illustrating need, demonstrating where service delivery is effective and identifying gaps to be filled or possible areas of resource reallocation); and*
- allocating additional resources to ensure that agencies that would otherwise find it difficult to participate in 'SHIP' can do so.

Recommendation 12:

That consideration be given to altering SHSC questions to take account of the fact that service system entry points may provide different services from other homelessness agencies.

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Recommendation 13:

That consideration be given to matching SHSC data with that from other collections (eg NDRAHA) in order to ascertain how homelessness service delivery intersects with other services to achieve outcomes such as sustainment of social housing tenure.

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Introduction

This paper considers accountability mechanisms in existing Council of Australian Governments (COAG) agreements on affordable housing and homelessness. It makes recommendations for improving those mechanisms' ability to deliver better outcomes for people who are experiencing homelessness (including those living in severely crowded housing) and for those at risk of homelessness.

Homelessness Australia (HA) anticipates consideration be given to the paper's recommendations and they be adapted into any new arrangements that emerge from the White Paper on Reform of the Federation and parallel COAG processes.⁸

Linking outcomes to funding can shift resources from service delivery to measurement with no offsetting benefit to programs, penalise prevention, development and other programs with harder-to-measure outcomes, promote 'creaming' (selecting participants who are more likely to succeed), inhibit innovation, punish risk-taking and discourage inter-program cooperation.⁹

⁸ See [COAG Communique 10 October 2014](#).

⁹ Plantz, Greenway & Hendricks (1997) 'Outcome measurement: Showing results in the nonprofit sector' *New Directions for Evaluation* 75, pp15-30.

Establishing context - Framing problem

There's a real fear of meaningless outcome measures and their [negative] impact on practice.

- *Victorian youth homelessness worker*

'There's a lot of data being collected, but it's only useful for reporting purposes – not program evaluation. The policy *principles* are about 'outcomes', but there's no proper *data* to support them. We spend a lot of time reporting, but it doesn't produce a clear picture about client needs or outcomes – it only ever reflects funding streams. If we want to conduct a program evaluation, we have to go through our case files manually; it can take months to strip out the multiples.

- *Victorian housing support manager*

'If you are a small organisation without liquidity getting good outcomes for clients, you don't want to be made subject to] an evaluation framework that says "we will pay you when you achieve XYZ - and not before".'

- *NSW youth homelessness worker*

'While the Federal Government's NPAH commitments are set out very clearly in the various Federal budget papers, I am having trouble finding the same amount of clarity for the state contribution... The state budget papers seem to spread out their NPAH funding commitment across a number of lines in the budget, so that it is not clear what the total amount is. I have found vague statements in media releases about contributions over time, rather than a breakdown of contribution for each financial year. I am starting to go cross-eyed looking at the various budget papers and media releases.'

- *WA housing provider*

Clarifying objectives, outcomes and indicators

The National Affordable Housing Agreement (NAHA) identified an objective and outcomes consistently with the IGAFRR framework,¹⁰ and set performance indicators of those outcomes' achievement. With the Agreement's 2012 review and amendment¹¹ provisional benchmarks were added.¹² At the same time, the agreement also listed desired 'outputs'— although these are structured like indicators – and identifies twelve 'agreed policy actions to achieve' 'ongoing reforms in the housing sector' which are 'priority areas for effort over the near term, noting that the rate of progress in many areas will be contingent on available resources'.¹³ Unfortunately, these elements do not cohere in ways that promote accountability for housing and homelessness policy decisions, service delivery and spending.

A framework, from which to measure funding effectiveness of government spending on housing and homelessness should be created, and which enunciates

- clear objectives
- clear outcomes
- and clear plan to achieve them

The objectives, outcomes and paths must be specific, measurable, achievable, realistic and time bound.

Towards a clear and effective framework

In the language of results-based accountability, there is a difference between measures that focus on 'big-picture' *ends*, ie

- outcomes: population- or system-level changes such as 'Children do not experience homelessness', which may take quite some time to achieve but in meanwhile function as goals to focus governmental efforts; and
- indicators: measures of change *towards those outcomes*, such as 'rate of homelessness among children (reduction)'.

and measures oriented to lower-level *means towards those ends*:

- strategies or outputs: steps which, parties agree, will – according to an articulated 'program logic' - contribute to achieving those outcomes (eg building 500 low-cost houses capable of housing families with children; and

¹⁰ See Appendix A.

¹¹ COAG, [Review of the NAHA Performance Reporting Framework](#), 2012 p 13.

¹² Compare the [original NAHA](#) with the [revised agreement](#).

¹³ Clauses 20 and 21.

- performance measures: mechanisms that tell us whether the *strategies* chosen *actually are* contributing to the *outcomes*, eg ‘number of new, low-cost houses allocated to families with children who were experiencing, or were at risk of, homelessness’ or ‘number of children whom Specialist Homelessness Services were able to assist into new, low-cost housing who sustain that housing after one year’.

Homelessness is a complex phenomenon, and the availability of housing in Australia is increasingly affected by global factors, including economic urbanisation, labour migration, population ageing and relaxation of foreign investment controls. Neither homelessness nor the present housing shortage is fully within Australian governments’ control. Nonetheless, governments can be held accountable for the contributions of their own policies to those phenomena. At present, the NAHA’s ambitions are not expressed to control housing taxation, and immigration decisions are made largely without an assessment of their impact on housing. These omissions must be remedied if progress is to be made towards the NAHA objective of affordable, safe and sustainable housing that contributes to social and economic participation for everyone.

The relationship between the NAHA’s many ‘Reform and policy directions’ and its outcomes is also not self-evident, which may partly explain why actual progress in these ‘directions’ has been so uneven.¹⁴ There are no proper measures of whether or not states or territories are doing anything under the guise of these directions, let alone mechanisms for measuring whether that movement is contributing to Agreement outcomes.

Progress on NAHA outcomes

The outcomes to which governments committed under the NAHA are:

- people who are homeless or at risk of homelessness achieve sustainable housing and social inclusion;
- people are able to rent housing that meets their needs;
- people can purchase affordable housing;
- people have access to housing through an efficient and responsive housing market;
- Indigenous people have the same housing opportunities (in relation to homelessness services, housing rental, housing purchase and access to housing through an efficient and responsive housing market) as other Australians;
- Indigenous people have improved housing amenity and reduced overcrowding, particularly in remote areas and discrete communities.

In its last (2012) report on housing affordability, the COAG Reform Council (CRC) stated:

¹⁴ There has been progress in development of a not-for-profit housing sector and national regulation of social housing, but some states have barely commenced ‘planning reform for greater efficiency in the supply of housing’.

Based on the indicators and years we can report on... at the national level there has been no indication of progress toward the housing affordability outcomes in the [NAHA].¹⁵

In its final (2013) report on homelessness, the CRC reported an increase in overall homelessness, but a slight drop in indigenous overcrowding.¹⁶ The usefulness and reliability of these measures is discussed further below.

There is no disputing that housing affordability has actually *declined* since 2008, while homelessness has increased (in terms of both estimated raw numbers and as a proportion of population). If those trends are to be arrested, it is important that governments, and others with responsibility for curtailing them, set clear goals ('outcomes') to that effect, and identify measures that actually tells us whether or not 'the curve is being turned'¹⁷ towards those goals.

Misclassification of indicators as 'outputs'

The existing NAHA, NPAH and NPARIH outcomes and the indicators used to measure them are considered in this section. Possible ways in which better measurement of those outcomes might be achieved are also suggested.

Outcome(a): 'people who are homeless or at risk of homelessness achieve sustainable housing and social inclusion'

The NAHA indicators for this outcome are

- 16 (c) proportion of Australians who are homeless; and
- (d) proportion of people experiencing repeat periods of homelessness...

'Indicator 3': Proportion of Australians who are homeless

It is generally accepted that the ABS's method of quantifying homelessness is inherently an *underestimate*,¹⁸ but is the only national data available. It shows that the proportion of the population¹⁹ experiencing homelessness *increased* by 8 per cent (an extra 3.7 persons for every 10,000) between 2006 and 2011.

¹⁵ [Affordable Housing 2010-11: Comparing Performance Across Australia](#), report to the Council of Australian Governments, 30 April 2012, p xv.

¹⁶ [Homelessness 2011-12: Comparing performance across Australia](#), 2013.

¹⁷ ...*Trying Hard is Not Good Enough* etc.

¹⁸ See ABS, [Homelessness Statistics](#), 2012.

¹⁹ It is not clear why the NAHA indicator refers to 'proportion of Australians' rather than, say, 'proportion of Australian permanent residents' or even 'proportion of residents'. 'Temporary'

Both the CRC and the COAG Working Group that reviewed the NAHA performance reporting framework in 2012 cautioned that *an increase* in the proportion of population estimated to be experiencing homelessness will not necessarily indicate lack of progress towards NAHA Outcome A if it stems in part from increased uptake of support services. The fact that almost 4,000 additional people were accommodated by SHSs in 2011 could, at least in the context of the accompanying drop in the number (434 people) of ‘rough sleepers’ since 2006, indicate partial *progress* towards Outcome A if it meant that hundreds of people moved from rough sleeping to occupy new supported accommodation places.

However, most of the 2006-2011 increase in homelessness was not explained by this increase in supported accommodation, but by almost 10,000 more people living in severely crowded housing (up from 15.9 to 19.2 persons per 10,000). More than half of those were Aborigines living in remote Australia (particularly the NT), and another 13,000 were people born overseas who had arrived in Australia within the previous five years.

As discussed in the overcrowding indicator, ‘indicator X’, the mechanism for measuring change in severe crowding in Aboriginal Australia, is defective. The inter-censal increase in severe crowding in households containing newly-arrived migrants in particular draws attention to the relationship between population increase and lack of affordable housing. There is presently no mechanism to ensure that housing supply keeps pace with net overseas migration. People living in severe crowding are likely to have been among the more than 22,000 SHS clients who cited ‘inadequate or inappropriate dwelling conditions’ as their main reason for seeking assistance in 2012-13. However, this data is not a good proxy for remote indigenous overcrowding: only a few hundred clients citing this main reason were indigenous people in remote or very remote areas.

A 2012 Working Group review of indicators 3 and 4 recommended that COAG note

- ‘the potential of work on inter-censal counts of homelessness to improve the reporting under the NAHA; and...
- that [because of measuring difficulties,] it may be appropriate to reframe Outcome A to remove the reference to social inclusion.’

Inter-censal homelessness counts are desirable, but likely to prove costly. In a climate of fiscal restraint, it may be better to focus on ensuring that homelessness services continue to be delivered in, or move to, areas of need and on increasing housing supply, and to link the timeframe for change in indicator 3 to the Census.

residents (which can include people who have been in Australia for years) whose accommodation is not provided by their employers may have been caught by the ABS homelessness estimate.

Similarly, degrees of social inclusion are sufficiently difficult to quantify that it may be impossible to design a proper indicator for this purpose. However, we already measure important, related changes in circumstances of *SHS clients* through the Specialist Homelessness Services Collection (SHSC). This proxy data (which can be analysed longitudinally where clients can be matched across multiple years) could be used better than it presently is to quantify the extent to which existing homelessness service systems are contributing to NAHA Outcome A. Relevant SHSC data about client 'outcomes' relates to access to government benefits

- housing
- education
- employment
- proportion of case management goals met

A longitudinal focus on housing outcomes data would enable it to be ascertained whether clients who have been supported to obtain housing subsequently return to the service system for repeat support, particularly accommodation. It is understood that AIHW will shortly publish a national analysis of this kind which focuses on four (overlapping) vulnerable cohorts. This data would support additional NAHA performance indicators tracking numbers of such client 'exits' from homelessness services systems, particularly those *which are not followed by* further SHS support periods involving assistance to obtain new accommodation, eg:

Proportion²⁰ of SHS clients assisted to obtain housing who do not return for accommodation assistance within two years (measured annually, decrease desirable)

Some of the present 'outputs' such as the number of people assisted to sustain their tenancies could then be tracked.

However, it would be necessary to qualify this indicator by reference to the prevalence of homelessness *outside of* the service system, eg as follows:

Proportion²¹ of people experiencing homelessness on Census night 2016 who are *not* accommodated in supported accommodation for the homeless (no increase on 2011 desirable)

Deployment of indicators of this kind will prove meaningful only if accompanied by substantial additional investments in affordable housing supply. Homelessness service

²⁰ *If we are serious about reducing homelessness, it is desirable to buttress these measures with raw number ceilings to ensure ongoing progress despite population increases, eg an absolute maximum of 150,000 returning SHS clients in any given year; no more than 80,000 homeless people sleeping outside SHS accommodation on Census night*

²¹ *Ibid.*

systems in most states and territories already suffer from serious blockages caused by a lack of 'exit points' into social or affordable housing. This shortage is now the main challenge facing homelessness services and is apparent from state and territory reports under the National Partnership Agreement on Homelessness (NPAH)²² and evaluations of NPAH initiatives.²³

'Indicator 4': Proportion of people experiencing repeat periods of homelessness

Both the CRC and the COAG Working Group have noted this indicator's limitations, which extend beyond those, identified above, on the effectiveness of SHS client data as a proxy measure of wider homelessness. The SHSC 'repeat homelessness' measure identifies about 4000 people each reporting year (1.8 per cent of clients in 2011-12 and 1.6 per cent of clients in 2012-13) whose monthly status changed from 'homeless' to 'not homeless' and back again.

It is not possible to capture individuals' lifetime experiences of homelessness in a large-scale data set, even if it is possible to do so for some types of homelessness in limited geographical areas (eg via 'street counts'). A more useful application of this indicator and SHSC data would be as measures of service system effectiveness – by allowing longitudinal identification of the numbers and characteristics of clients originally identified as homeless who have returned for additional SHS assistance, including whether they have remained homeless or seek assistance to avoid falling into that situation again. Thus the indicator would be better framed in terms such as these:

Proportion of SHSs clients previously identified by a SHS as homeless who are not homeless when they seek SHS assistance again.

²² For example, the 'key challenge' presented by a lack of affordable housing is mentioned in the 2012-13 ACT NPAH report on pp 14, 27 and 32 and on p 38 of the WA NPAH report for that year. The WA report records an 'acute shortage of affordable rentals' contributing to 'unsustainable rents for an increasing proportion of the population on fixed and low to medium incomes' (p 13), 'extremely challenging' conditions brought about by such shortages of accommodation for clients leaving correctional facilities, particularly young people (p 20), 'extreme housing shortages' in two remote areas (p 22), and a lack of access to affordable housing for women and children in rural and remote areas, especially mining regions (p 27). The Queensland NPAH report notes that 44 per cent of people referred to 'A Place to Call Home' social housing in that state could not be accommodated by it (p 2), and that demand for the Youth Housing and Reintegration Scheme (YHARS) for young people leaving detention consistently exceeded available affordable and longer-term accommodation (p 20), with particularly pronounced effects for young Aboriginal or Torres Strait Islander people. Sometimes a 12-18 month wait for accommodation absorbed brokerage funds designed to develop clients' capacity to *maintain* accommodation. Access to affordable and appropriate housing was a critical success factor for the Street to Home program (p 5), and a lack of it limited the success of Queensland's Emergency Department Liaison program (p 16).

²³ Eg the 'Street to home' evaluations – see reports 42, 43, 44 and 47 under the [National Homelessness Research Agenda](#).

However, it would be necessary to qualify this indicator in a way that avoids increasing clients' uptake of other undesirable housing options, eg perhaps by reference to the following:

Proportion of people living in other crowded or marginal housing on Census night 2016 (no increase on 2011 desirable)

Proportion of people entering prison who report being homeless in the preceding four weeks (no increase on the National Prisoner Health Indicators 2012 rate of 35 per cent, and no increase on the indigenous rate of 43 per cent)

Proportion of people experiencing partner violence (no increase on ABS Personal Safety Survey 2012 rate of 1.1 per cent of population)

Proportion of people experiencing violence from a boyfriend, girlfriend or date (no increase on the ABS Personal Safety Survey rate of 0.6 per cent of population)

Proportion of people experiencing violence from another known person (no increase on ABS Personal Safety Survey rate of 2.6 per cent of population)²⁴

Outcome (b): 'People are able to rent housing that meets their needs'

'Indicator 1': Proportion of low income renter households in rental stress

The NAHA indicator for this outcome ('indicator 1') is:

16 (a) proportion of low income renter households in rental stress...

'Rental stress' is overwhelmingly relevant to the private rental market.²⁵ References to 'low income' households (measured according to equivalised disposable income) can obscure significant differences in household *wealth*.²⁶ However, household income presently remains a reasonable proxy for relative disadvantage where renters are concerned, because the net worth of renters as a whole remains low by Australian standards.²⁷ This issue may need to be revisited if numbers of 'first home investors' (people buying their first houses as landlords) or mobile home park residents (people who rent the land on which their homes are located, typically after retirement) increase significantly.

The other defects with this indicator are:

²⁴ Comments above about imposition of raw number ceilings apply here as well. Ideally governments would also commit independently to reducing the rate of reported homelessness among people entering prison.

²⁵ The CRC did measure it in social housing, but found it to be very low.

²⁶ ABS, [Household wealth and wealth distribution 2011-12](#).

²⁷ *Ibid.*

- That it provides at best an incomplete picture, particularly as Australian cities expand geographically while employment opportunities are concentrated near their centres:

‘...[H]ousing stress underestimates the housing affordability issues in Australia by concentrating only on the financial burden faced through direct housing consumption. In reality, housing affordability encompasses deposit and payment constraints preventing household formation; quality and location trade-offs [including those that avoid “transport disadvantage”] and the overall costs of housing consumption including utility bills, for example.’²⁸

- That it provides no measure of the circumstances of low-income people who are *unable to get into rental stress* because the housing that they would like to occupy is being occupied by higher-income people ‘renting down’. The 2012 COAG Review of NAHA performance indicators recommended:

that the Select Council on Housing and Homelessness report back to COAG on a potential indicator on rental accommodation that is affordable and available to low income households in the first quarter of 2013 [emphasis added].²⁹

In order to take account ‘transport disadvantage’, the indicator could be amended to show the desirability of smaller proportions of low-income renter households in rental stress the further these households live from capital cities or other areas where work is available, eg

Proportion of low-income renter households in rental stress living within 10 km of a capital city CBD (desirable < 3X %)

Proportion of low-income renter households in rental stress living within 20 km of a capital city CBD with direct public transport access to that CBD (desirable < 2X %)

Proportion of low-income renter households in rental stress living within 20 km of a capital city CBD with direct public transport access to that CBD (desirable < X %)

Other possible indicators for this outcome could include:

Proportion of households eligible for social housing who obtain social housing

Although the supply of social housing stock rises slightly every year, it is far outstripped by demand.

Outcome (c): ‘people can purchase affordable housing’

²⁸ Rowley and Ong, *Housing Affordability, Housing Stress and Household Wellbeing in Australia*, 2012.

²⁹ P 7

‘Indicator 2’: Proportion of houses sold affordable to low or moderate income households

The NAHA performance indicator for this outcome (‘indicator 2’) is:

- 16 (b) the number of homes sold or built per 1000 low and moderate income households that are affordable by low and moderate income households.

Indicator 2 suffers from a number of defects that prevent it from capturing the full extent to which low and moderate income earners are locked out of the home purchase market. However, even if the indicator is treated as a reliable measure, it has shown no improvements in home purchase affordability due to inter-government efforts under the NAHA – on the contrary, affordability on this measure has continued to decline. The CRC’s last report on indicator 2 stated that:

In all jurisdictions, homes became less affordable for low and moderate income households to buy between 2009-10 and 2010-11.³⁰

Table GA.9 of the *Report on Government Services 2014*,³¹ shows that, in 2011-12, NAHA indicator 2 moved significantly further in the wrong direction in all states and territories³² except Queensland, Tasmania and South Australia (which experienced a slight deterioration).

The deficiencies of indicator 2 include:

- it relates to houses sold only – there is no data for houses built, including by owner-builders;
- it measures affordability by reference to income only, excluding consideration of other wealth;
- it is calculated by reference to small samples of low and moderate income earners located at the top of the second and third income quintiles. Even if it shows that houses are affordable to ‘low income’ households (those at the 40% line), they are unlikely to be affordable to people in the bottom 20%;
- it measures affordability by reference to different levels of income and different prices in different states or territories.³³ The reason for this is the link to local wages. However, this local focus means that the indicator masks substantial additional home purchase unaffordability at a national level: houses affordable to households located at the top of the bottom two or three income quintiles in Sydney or even Canberra are not affordable to their counterparts from rural Tasmania, who earn a

³⁰ p 15.

³¹ This table is based on data prepared by the Steering Committee for the Review of Government Service Provision for the CRC before the CRC’s abolition in 2013. In the past, this data was published as a statistical supplement to CRC reports.

³² Figures for smaller jurisdictions must be treated with caution due the small number of sales.

³³ See Table NAHA CI.4 of the SCRGSP statistical supplement to the CRC’s 2010-11 NAHA report, or Table 4.2 of its 2009-10 NAHA report.

great deal less. This additional home purchase unaffordability must be acknowledged before efforts to require people from areas of low employment to move to those of higher employment in search of work can succeed;

- indicator 2 tells us nothing about who bought the small number of affordable houses that were sold – in particular,
 - whether they were sold to low or moderate income households or ‘bargain-hunters’ from higher income groups;
 - whether they were sold to households intending to occupy them or investors or foreign purchasers and/or as second homes or holiday houses;
 - whether, after purchase, they were actually occupied, or left empty;³⁴
- movements in this indicator owe more to interest rate changes than they do to government actions.³⁵

A simpler measure is needed to ascertain home purchase affordability. It needs to register at the national, as well as the state and territory level, and focus on home purchases for occupation, rather than investment or ‘lock up and leave’ properties. (eg those made for the purpose of acquiring permanent residency, or second homes used by their owners for less than six weeks a year).

It may be more straightforward to focus on:

- the number of properties that are sold under a certain, annually indexed, price threshold (eg \$250,000), as a proportion of total sales;

and to match those figures to

- the number of purchases by owner-occupiers financed for amounts up to that price threshold, excluding refinancing, as a proportion of all purchases financed.³⁶

This approach will does not take into account purchases that are not loan-financed, and owner-occupier purchases financed from abroad, but would produce a more reliable indicator of home purchase affordability than the present NAHA indicator 2.

The CRC adopted a ‘supplementary indicator’ of home purchase affordability – proportion of low income households in mortgage stress, noting that this measure remained relatively stable over time (at around 37 per cent). However, this is also an imperfect measure: in its last report on home purchase affordability, the CRC observed that almost a quarter of low-income households in this position were among the top 30% of households for *wealth*.

³⁴ On one estimate (based on water use), there were almost 64,500 empty properties in Melbourne in 2013: Soos and Egan, [Speculative Vacancies in Melbourne 2013](#), Prosper Australia, October 2013.

³⁵ This was the CRC’s conclusion in its 2009-10 and 2010-11 NAHA performance reports.

³⁶ This data is available from the ABS: [5609.0 - Housing Finance, Australia](#).

Outcome (d): 'People have access to housing through an efficient and responsive market'

See above

Outcome (e): 'Indigenous people have the same housing opportunities as other Australians, & Outcome (f): 'Indigenous people have improved housing amenity and reduced overcrowding, particularly in remote areas'

The measure of overcrowding is faulty because, while the most severe overcrowding problems are in remote areas, the denominator for this measure is the national indigenous population, which is growing much faster than the remote indigenous population. This growth explains improvements in overcrowding rates. As the CRC has also explained, the performance indicator

- f) proportion of Indigenous households living in overcrowded conditions including remote and discrete communities;

measures households, not people. Since the average number of people in an overcrowded indigenous household is 12, the indicator obscures the scale of the human impact of overcrowding.

The other NAHA indicator relevant to this outcome is

- g) proportion of Indigenous households living in houses of an acceptable standard including in remote and discrete communities;

Research for this report was unable to uncover any reporting on this indicator. It could be hypothesised that the word 'acceptable' creates a problem for reporting.

To be effective, the NAHA must take account of resident population

The NAHA's 'aspirational objective' is that 'all Australians have access to affordable, safe and sustainable housing that contributes to social and economic participation'. However, it would be reasonable to assume that these outcomes be desired for all people resident in Australia. Signatory governments undoubtedly also want affordable, safe and sustainable housing for people who are allowed to reside in Australia (and to rent or purchase housing for that purpose) despite not being entitled to vote, eg the large number of permanent residents who have not taken out citizenship and the more than 1 million long-term 'temporary' residents.³⁷ It would be disturbing if governments accepted that anyone, even

³⁷ People whose visas also allow them to purchase housing (including 'second-hand' dwellings) without approval include [the 195,000 holders of sub-class 457 visas, 25,000 temporary graduate visa holders, almost 340,000 foreign students or almost 650,000 New Zealand citizens on sub-class 444 visas](#) (although some people in the latter two groups will be children).

short-term visitors – e.g. the more than 150,000 working holiday-makers)³⁸ or the tens of thousands of people on various types of bridging visas – should experience unsafe housing,³⁹ if only because these conditions might pose public health risks.

Population-level outcomes

When the NAHA refers to ‘housing’, it must mean *well-located housing of a reasonable standard for the purposes of shelter*. However, this focus on the physical needs of the *occupants of housing* could be made clearer, particularly in relation to outcomes 2, 3 and 4 – ‘people can purchase affordable housing’ and ‘people have access to housing through an efficient and responsive housing market’. What is most important is not the quality of market mechanisms *per se* but the fact that they *allow people to secure somewhere affordable to live when they need it*, preferably in a location that provides access to services and to community, education and employment opportunities. At present, these two outcomes in particular do not distinguish between

- people who need to consume housing for the purposes of shelter and access to services and labour markets; and
- the increasing numbers who wish to consume housing for investment or recreational purposes or to ‘lock up and leave’ for *future* occupation by themselves (eg when they retire to a coastal or rural area, return from working overseas to raise a family or realise an ambition to migrate to Australia) or other family members (eg adult children or ageing parents).

While an ideal housing market might cater for all of this demand, governments’ priority when spending public money must be the *immediate shelter and safety* of people who presently reside in Australia or whose birth or arrival here is imminent. HA therefore recommends that outcomes 2, 3 and 4 be consolidated and amended along the following lines:

People are able to purchase or rent housing of a reasonable standard that meets their needs for safe shelter and access to services and labour markets;

Supply of well-located affordable or social housing meets demand from people who need to occupy that housing

Outcomes framed in this way may also help to focus governments’ attention on the affordable housing dimensions of COAG’s National Report on Development Assessment Performance (NRDAP) agenda, under which states and territories received a \$30 million

³⁸ Department of Immigration, [Temporary Residents and New Zealand Citizens in Australia as at 30 June 2014](#).

³⁹ As those affected by the [Alexandria backpacker fire](#) in July this year did.

allocation from the former federal Housing Affordability Fund (HAF) to develop electronic Development Application (eDA) systems.⁴⁰ These investments seem to have taken a long time to bear a limited amount of fruit.⁴¹ HA also notes the COAG Reform Council (CRC)'s 2011 view that states' and territories' capital city planning was yet to engage three key issues for homelessness: demographic change, housing affordability and social inclusion.⁴² These issues warrant urgent attention and should not continue to be put aside in favour of the interests of people who *already have* adequate housing (eg by maintenance of planning regimes that facilitate existing property owners' opposition to affordable housing developments or opposition to 'salt-and-pepper' distribution of social housing).⁴³

Some progress towards the first of the NAHA outcomes addressing housing inequalities for indigenous people will be made by increasing social and affordable housing supply. However, it is important to retain this outcome while the Aboriginal population is comparatively young and disadvantaged (indigenous home ownership rates run at half the Australian average and a quarter of it in remote areas) racial and economic discrimination persists in the private rental market;⁴⁴ the NPARIH has not entirely eliminated *severe* crowding in remote Australia while high levels remain in 'very remote' areas and there are

⁴⁰ See COAG's 2012 [Review of the NAHA performance reporting framework](#), p 9.

⁴¹ In 2012, the Productivity Commission (PC) heard that the NRDAP 'train is still at the station' (*Impacts of COAG reforms: business regulation and VET*, [ch 14](#) 'Development assistance', p 300), finding in a separate report that '[a]vailability and use of eDA systems varies across jurisdictions and councils' with the territories leading the way: *COAG's Regulatory and Competition Reform Agenda: a high-level assessment of the gains*, August 2012, [ch 5](#) p 37:

'According to the CRC (2012), the rollout of eDA processing nationally has not been achieved and primarily reflects major technical and resourcing issues and uncertain commitment by governments to its take-up. The [PC] (PC 2012b) estimated that the total cost of rolling out electronic codes would be around \$115 million... but [in 2010-2011] less than 2 per cent of applications had been lodged using the Victorian Government's ePlanning system... In NSW, the most recent estimate (2008-9) was 13 per cent....'

However, it appears that jurisdictions have moved further down this track as the 2015 deadline approaches (see, for example the materials on <http://www.planning.nsw.gov.au/en-au/buildinginnswe-planningfornew.aspx> (developed in 2014).)

⁴² CRC, [Review of Capital City Strategic Planning Systems](#), 2011, p 2.

⁴³ AIHW commented recently that: 'Over the 10 years of the *Demographia International Housing Affordability Survey*, all metropolitan areas that have reached severe housing affordability (which they defined as [the median house price exceeding five times median income] have had restrictive land-use regulation, especially urban containment policy. On the other hand, no liberally regulated metropolitan area has reached severe housing affordability. An examination of longer historical data (available in Australia, Canada, New Zealand, the United Kingdom and the United States) confirms this for earlier years ([Housing Assistance in Australia 2014](#), pp 21-22. For Demographia's 2014 survey, see <http://www.demographia.com/dhi.pdf>).⁴³ The Demographia surveys have their methodological limitations (See Phibbs and Gurrin, [Demographia housing affordability surveys: an assessment of the methodology](#), Shelter NSW Brief 35, October 2008), but legitimate concerns remain about how well Australia's cities can accommodate everyone if their planning controls lean so heavily in favour of the interests of existing owners.

⁴⁴ See, for example, Schwarz *et al*, [The Civil and Family Law Needs of Aboriginal People in Victoria](#), 2013, p 11 and Equal Opportunity Commission of WA, [Accommodating Everyone](#) 2009 p 76.

still many ordinarily ‘crowded’ houses in both⁴⁵ and anecdotal evidence suggests that the 2016 Census may uncover increased crowding in indigenous households in more populated regions.

The benefits of this outcome could usefully also be extended to five other groups of low-wealth people, or at the very least those who are entitled to reside permanently in Australia:

- children (who have a particular need for residential stability, and for whom some housing options, eg boarding houses or motels, are not suitable);
- young people (whose developmental needs may also require particular types of housing, but who may be priced out of the housing market by people with greater wealth)
- single people (large numbers of whom are now priced out of the housing market, and who are represented among SHS clients in large numbers);
- older people (who find it hard to obtain work and whose savings or superannuation may not be adequate to house them); and
- women (whose financial resources are usually not equal to those of men, particularly if they have spent periods out of the workforce raising children).

The final NAHA outcome (Indigenous people have improved housing amenity and reduced overcrowding, particularly in remote areas and discrete communities) needs to remain so long as poor housing amenity and overcrowding continue to be features of indigenous housing.

Governments also need to cultivate a climate in which housing supply meets underlying demand,⁴⁶ including by matching natural population increase, as well as taking account of the specific needs of vulnerable people who are always likely to struggle to sustain housing in the private market. In HA’s view, therefore, it is essential that that at least a portion of the affordable housing SPP be explicitly linked to proper, long-term housing needs assessment and planning⁴⁷ that takes account of likely population increase and patterns of

⁴⁵ ‘ABS Census data indicates [that] levels of overcrowding in Indigenous households in remote Australia have reduced from 22.3 per cent in 2006 to 20.1 per cent in 2011, and from 40.5 per cent to 38.9 per cent in very remote Australia.

‘Similarly, the proportion of severely overcrowded households in remote Australia has reduced from 5.1 per cent in 2006 to 3.9 per cent in 2011, and from 16.3 to 15.0 per cent in very remote Australia’: [National Partnership Agreement on Remote Indigenous Housing – Review of Progress 2008-2013](#), p 7. See also AIHW, [Housing Circumstances of Indigenous Households: Tenure and Overcrowding](#) 2014, p vi.

⁴⁶ See the National Housing Supply Council’s unpublished 2013 [State of Supply report](#), chapter 1.

⁴⁷ eg of the kind undertaken for some Victorian [cities](#) and Queensland [councils](#); see also http://www.planning.wa.gov.au/dop_pub_pdf/Planning_for_Affordable_Housing_Discussion_Paper_-_Final_Draft.pdf

housing formation and accepts the ongoing need for well-located social housing for vulnerable groups.

‘Outputs’ that could be considered for inclusion in the NAHA (ie, those for which a program logic contributing to NAHA outcomes could be articulated) are:

- a Commonwealth housing strategy and similar strategies at the state/territory or major metropolitan levels⁴⁸ and/or for social or affordable housing in each jurisdiction⁴⁹
- housing needs assessments in all states and territories
- housing impact statements for all major changes in other government policies that affect whether everyone resident in Australia can obtain shelter, particularly at the less expensive end of the market
- Commonwealth, state and territory revenue policies consistent with this Agreement’s objective, including
 - o a rebalancing of the present income tax treatment of rental property to encourage construction of *additional, low-cost, well-located housing of a reasonable standard that, once built, is occupied for at least 10 months a year*⁵⁰ – in particular, smaller units suitable for single, young and older people.⁵¹

and

- o an *intergovernmental* solution to the barriers to labour mobility and ‘downsizing’ posed by state or territory transaction taxes.

⁴⁸ In this context there is an urgent need to reconsider the role of local government in planning for globalised cities such as Sydney: see, for example, Lucy Turnbull, ‘[Housing Australia: not in my street](#)’, presentation to the HIA *Building Better Cities Summit 2014*.

⁴⁹ eg in 2013 the NSW Auditor-General urged development of a state social housing strategy.

⁵⁰ This occupation requirement could of course be made subject to reasonable exceptions and averaging over a longer period.

⁵¹ The present tax treatment of rental property ‘can encourage surges of debt-funded investor activity in anticipation of concessionally taxed capital gains’ (Australia’s Future Tax System, *Final Report*, [ch A1](#)) that drive up prices without necessarily housing anyone and favour *newly-built* properties over *additional supply*. An individual taxpayer can presently claim significant depreciation for housing that is *newly built* and *large* but may simply have replaced older housing of a similar size, or for mortgage payments and other losses on housing that is *available for rent* but *empty for long periods*. The investment argument for similar tax treatment of housing and other asset classes needs to yield to far more urgent arguments in favour of shelter.

- Supply of social housing that keeps pace with population growth and distribution and does not result in long waiting lists
- A social housing system in which priority in allocation is given to applicants in greatest need and stock is well-maintained and quickly reallocated
- An *additional* 10,000 new affordable dwellings per year in each of the next five years, distributed across states and territories on a *per-capita* basis, for occupation by low-to-moderate income households without assets
- Introduction of streamlined approvals processes in all states and territories for construction of safe, self-contained 'granny flats' of a reasonable standard that can be rented to non-family members under residential tenancy laws
- Homelessness service systems that can meet demand for their services, including for accommodation, and are well-connected with other service providers
- Government services that understand the needs of people experiencing or at risk of homelessness and are well-connected with homelessness service systems.

Recommendations for Clarifying objectives, outcomes and indicators

Revising, reframing objectives and outcomes:

Recommendation 1:

That the NAHA objective be reframed as follows:

Everyone resident in Australia has access to affordable, safe and sustainable housing that contributes to social and economic participation.

Recommendation 2:

That outcomes be specified for different targeted entities:

- a) system/ structurally
- b) government agencies
- c) programs
- d) services
- e) population (eg everyone being housed)

Recommendation 3:

That the NAHA outcomes be amended

- by replacing those in cl 7(b), (c) and (d) with the following:

People are able to purchase or rent housing of a reasonable standard that meets their needs for safe shelter and access to services and labour markets;

Supply of well-located affordable or social housing meets demand from people who need to occupy that housing

- by amending the outcome in cl (e) so that it reads:

all people entitled to reside permanently in Australian – including Indigenous people, children, young people, women, older people and single people – have the same housing opportunities, and other residents are not denied them without good reason.

Some present NAHA 'outputs' could be re-purposed as indicators

Most of the NAHA's present outcomes are associated with specific performance indicators. However, some of what the agreement misclassifies as 'outputs' are structured more like performance indicators:

- number of people who are homeless or at risk of homelessness who are assisted to secure and sustain their tenancies;
- number of people who are assisted to move from crisis accommodation or primary homelessness to sustainable accommodation;
- number of households assisted in social housing;
- number of households in private rental receiving subsidies;
- number of people receiving home purchase assistance;
- number of zoned lots available for residential construction; and
- number of indigenous households provided with safe and affordable housing.

As the CRC and COAG have pointed out, several of these measures are problematic as indicators of progress towards NAHA outcomes. They are expressed in terms of *numbers*, rather than *proportions of* population, SHS clients, households etc,⁵² and the direction in which it is desired that they move is not always clear – in some cases, a move either way could represent progress.⁵³ A third problem is that it is not clear that the activities contemplated by each measure *actually* contribute to NAHA outcomes – for example, provision of home purchase assistance, especially without further qualifications, may not be consistent with 'people hav[ing] access to an efficient and responsive housing market' or the increased supply of affordable housing advocated above if its main consequence is to contribute to house price increases.⁵⁴

Nonetheless, in the right context, several of these 'outputs' could be revised as indicators of progress towards NAHA outcomes 1 (people who are homeless or at risk of homelessness achieve sustainable housing and social inclusion), 2 (people are able to rent housing that meets their needs) 5 (Indigenous people have the same housing opportunities... as other Australians) and 6 (Indigenous people have improved housing amenity and reduced overcrowding, particularly in remote areas and discrete communities) as well as the new

⁵² As a COAG Working Group commented in its November 2011 [Review of the National Partnership Agreement on Homelessness](#): 'To improve the accuracy of reporting the real changes over time,... all performance indicators should be expressed in terms of proportion, rather than number...' pp 8-9.

⁵³ eg an *increase* in the 'number of households in private rental receiving [rental] subsidies' could be regarded as contributing to the outcome 'people can rent housing that meets their needs', but a drop in the number of such households in the context of a more affordable housing market might also be regarded as contributing to that goal.

⁵⁴ See the critique of these policies by Eslake in '[Fifty years of housing failure](#)', Address to the 122nd annual Henry George Memorial Dinner, Royal Society of Victoria, September 2013.

‘supply meets demand’ outcome proposed above. This is particularly so, now that performance indicators in the NPAH 2014-15 are very limited in number and scope.

The National Partnership Agreements

The National Partnership Agreement on Homelessness (NPAH) and the National Partnership Agreement on Remote Indigenous Housing (NPARIH) were originally framed as ‘contributing to’ particular NAHA outcomes, respectively:⁵⁵

7(a) people who are homeless or at risk of homelessness achieve sustainable housing and social inclusion [and]

(f) Indigenous people have improved amenity and reduced overcrowding, particularly in remote and discrete communities.

It is essential that governments do not lose sight of these agreed aims, which are yet to be realised.

The NPAH

The original NPAH also contained its own outcomes:

- (a) Fewer people will become homeless and fewer of these will sleep rough;
- (b) Fewer people will become homeless more than once;
- (c) People at risk of or experiencing homelessness will maintain or improve connections with their families and communities, and maintain or improve their education, training or employment participation;
- (d) People experiencing or at risk of homelessness will be supported by quality services, with improved access to sustainable housing.

The agreement contemplated achievement of these outcomes via a range⁵⁶ of core and additional outputs, by reference to strategies of early intervention and prevention, ‘breaking the cycle’ of homelessness to ‘help people get back on their feet’ and building ‘a better connected service system’. Core outputs were ‘A Place to Call Home’ supported housing, ‘Street to Home’ initiatives for rough sleepers, tenancy support programs and associated services (eg financial counselling) and ‘assistance for people leaving child protection services, correctional and health facilities, to access and maintain stable,

⁵⁵ See NPAH 2008-2013 cl 13 (‘Objectives’) and NPARIH cl 12 (‘Outcomes’). NPARIH has its own ‘Objectives’ clause, which recites its establishment of a ‘ten year remote Indigenous housing strategy aimed at [achieving the following in remote Indigenous communities]:

(d) Significantly reducing severe overcrowding...;

(e) Increasing the supply of new houses and improving the condition of existing houses...; and

(f) Ensuring that rental houses are well maintained and managed...

⁵⁶ Cl 15.

affordable housing'.⁵⁷ Additional outputs could include services for older people, those with substance abuse or mental health issues; support to assist teenagers to reconnect with their families, and for women and children experiencing domestic or family violence to stay in their present housing, where it is safe to do so; improvements in service coordination and provision; assistance for homeless people (including families) to stabilise their situations and achieve sustainable housing; outreach programs to connect long-term rough sleepers to long-term housing and health services; national, state and rural (including remote) homelessness action plans to assist people in areas with high homelessness rates; support for children, including to keep them connected with school; legal services addressing problems related to homelessness and 'workforce development and career progression for workers in homelessness services'.

Movement towards the NPAH 2008-2013 outcomes was to be measured by (against 2006 baselines):

- a 7 per cent reduction in the number of people who were homeless by 2013;
- a 33 per cent reduction in the number of indigenous people who were homeless by 2013;
- a 25 reduction in the number of 'rough sleepers' [presumably by 2013].

However, as these measures were not ascertainable within that timeframe or on that basis. Homelessness estimates are based on Census data, collected in 2011. Recasting of ABS estimation methods⁵⁸ resulted in the 2006 baselines being revised down but the 2011 estimates showing a significant increase in the number of homeless people overall (17 per cent), a slight increase (3 per cent) in the number of homeless indigenous people, and only a slight reduction (-6 per cent) in the number of rough sleepers.⁵⁹ Also, some indicators were formulated in terms (eg proportions of population) that did not make sense by reference to their measures (eg raw numbers),⁶⁰ or of proportions of 'Australians' – a narrower category than that covered by the Census count.

Other indicators were based on Supported Accommodation and Assistance Program (SAAP) data, said to be a proxy until better measures are available:

- a 25 per cent reduction in the number of people released from care and custodial settings into homelessness by 2013;
- a less than [sic] 25 per cent reduction in the number of people exiting social housing and private rental into homelessness by 2013;

⁵⁷ CI 16.

⁵⁸ including to ensure that the estimates better captured residents of severely overcrowded dwellings. CRC, [Homelessness 2011-12: Comparing Performance Across Australia](#), 2013.

⁶⁰ For example, as the CRC pointed out, the *proportion* of homeless people in the indigenous population actually declined between 2006 and 2011, mainly because of a large increase in the underlying indigenous population.

- a 25 per cent reduction in [the number of people experiencing] three repeat periods of homelessness in a[n unspecified, presumably every] 12 month period.

The desired quantum and direction of many other changes was left for future agreement:

- number of families who maintain safe and sustainable housing after family violence, to be measured by an indicator to be developed in future;
- number of young people (12 to 18) who are homeless or at risk of homelessness who are re-engaged with family, school and work;
- number of children (under 12 years) who are homeless or at risk of homelessness who are provided with additional support to maintain contact with their school;
- number of families who are homeless or at risk of homelessness who receive financial advice, counselling and/or case management;
- number of people who are homeless or at risk who are provided with legal services; and
- number of staff of specialist homeless [*sic*] services provided with formal training and development opportunities.

However, the difficulty of measuring these phenomena, or their inutility as indicators of meaningful change – not least because of the difficulty of ascertaining whether their movement in a particular direction indicated a change in need or service provision or both – led the COAG Reform Council and a COAG Working Group to recommend their abandonment.

By contrast, the two most recent iterations of the NPAH have recited an ‘input-focused’ objective and reframed the original ‘outcomes’ in more modest but rather loose and circular terms:

Objective

7. The Parties will sustain their commitment to reducing homelessness through sustained effort and partnerships with business, the not for profit sector and the community.

Outcomes

8. This agreement will contribute to the following outcomes:
 - (a) The continuation of NPAH service delivery, which contributes to the following four outcomes:
 - (i) Fewer people will become homeless and fewer of these will sleep rough;
 - (ii) Fewer people will become homeless more than once;

- (iii) People at risk of or experiencing homelessness will maintain or improve connections with their families and communities, and maintain or improve their education, training or employment participation;
 - (iv) People experiencing or at risk of homelessness will be supported by quality services, with improved access to sustainable housing.
- (b) a maintenance of support services from the 2013-14 NPAH, targeting the specific needs of jurisdictions, including homelessness among Indigenous people, rough sleepers, young people exiting care and detention, and women and children experiencing domestic and family violence; and
 - (c) the continuation of reform of service delivery in order to ensure the response for those at risk of or experiencing homelessness is integrated, holistic and in line with best practice.

The main **‘outputs’** now contemplated are continued NPAH service delivery and ‘States continuing to implement reform agendas which support the national response to homelessness’.⁶¹ However, states and territories may continue to fund the ‘additional outputs’ permitted by the original NPAH (other than homelessness action plans), as well as tenancy support services.⁶²

The present NPAH’s performance indicators are also much less ambitious than those contained in the original. Additionally, linked performance indicators, focus on delivery of state and territory project plans and milestones for reporting on them.

Framing outcomes for clarity and accountability

The case for ‘outcomes-’ or ‘results-based’ accountability has been persuasively articulated by Friedman and others.⁶³ However, ‘outcomes’ measures are unlikely to be effective if framed imprecisely or without regard to the full range of causes of, or impediments to, desired changes, or linked in inappropriate ways to funding or other consequences.⁶⁴ In a climate of curtailed government spending, it is important that such measures do not operate simply as mechanisms for governments to transfer human services risks cheaply to the community sector.

⁶¹ CI 9. The NPAH 2013 ‘output’ of ‘planning for the introduction quality systems for specialist homelessness services that are equivalent to model 3 of the Homelessness National Quality Framework (NQF) if not already operating a system equivalent to model 3 or higher’ has disappeared. CI 10.

⁶² CI 10.

⁶³ Friedman’s publications on the topic, including the 2005 book *Trying Hard is Not Good Enough: How to Produce Measurable Improvements for Customers and Communities*, can be accessed via the website <http://raguide.org/>

⁶⁴ eg Department of the Premier and Cabinet, *Overview of Payment by Outcomes in Queensland*, February 2014.

Population or system outcomes must be framed differently from agency or program outcomes

A key issue for government-funded community sector agencies is the relationship between the 'outcomes' desired at a population, system or other aggregate level on the one hand and measures of the effectiveness of the services or programs funded to contribute to it on the other. One of the eight 'core principles' of results-based accountability articulated by Friedman *et al* is:

- keep accountability for populations separate from accountability for programs or agencies.⁶⁵

This distinction is essential to avoiding the risk of poor contract and risk management practices at the state or territory level,⁶⁶ eg simple devolution to the service delivery level of federal accountability measures for state or territory populations, with the sorts of results remarked on by the NT Auditor-General in his *2013 report on the National Partnership Agreement on Homelessness*:

... NGOs often felt that the responsibility for managing the program ha[d] been passed to them and [Territory Housing] no longer [considered it] a shared responsibility to address the initiative outcomes...

...There was a sense among NGOs that Agencies did not appear to understand fully what they had funded...

NGOs reported... an almost constant demand by Agencies for data and information with many requests lying outside of the scope of the original funding agreements. Some of this demand [resulted from] differences between Agencies' own requirements and information and data required by Housing for reporting to the Commonwealth... [R]esponding to these requests imposed costs for which NGOs were not funded...

...NGOs were concerned that the challenges they face balancing funding and staffing requirements under any government funding arrangement were not adequately recognised....

In their recent research for the former COAG Reform Council, the Nous Group concluded that, although this framework had increased reform momentum, improved evidence-based public reporting on agreed initiatives and injected additional funds:

⁶⁵ Friedman *et al*, 2001

⁶⁶ See generally the Productivity Commission's [Contribution of the Not-for-Profit Sector Report](#) 2010 ch 12, pp 329-347.

N[ational] P[artnerships] have become increasingly output focussed. In some cases this reflects the difficulties of finding suitable outcome indicators when agreements run for four years or less... [T]he spirit of collective effort to achieve outcomes has given way to a focus on compliance.⁶⁷

A number of survey respondents felt that the performance frameworks have, over time, become more rigid and prescriptive and that the Commonwealth exercises greater oversight and requires more reports than in the past...⁶⁸

[There was] a strong theme in our research that NPs, despite the intent of being outcomes focussed, had too many output indicators... [T]here was... a frustration that the link to outcomes appeared to have been weakened or lost.

This challenge is compounded by the [lack of] availability and suitability of data across multiple jurisdictions to report against outcomes...

A further difficulty... is finding appropriate indicators that can measure incremental, but possibly significant, change at the population level. With some of the NA targets, progress may not be perceivable within a 4-5 year period... [T]he key challenge... [is] one of being better at developing medium-term indicators...⁶⁹

[T]here would be interest in:

- accountability measures to ensure appropriate expenditure of public funds (a Commonwealth focus)
- reducing the reporting burden on jurisdictions
- driving performance improvement by setting targets
- leveraging available data collections
- building a longitudinal picture to inform future policy development
- sharing information on 'what works'⁷⁰

Perceptions of the effectiveness of the Intergovernmental Agreement on Federal Financial Relations (IGAFFR) performance frameworks in driving reform diminished the further out into line agencies survey respondents were located, and from the Commonwealth to the state and territory level, with some survey participants commenting that those frameworks had been superimposed on existing reform agendas. A tendency to improve capacity while failing to address underlying demand for services was observed in the health area.⁷¹

The Nous research noted that there had been moves to simplify NA performance measures, and that the COAG Reform Council had made recommendations to improve the quality of data to which these measures might be applied. Nous identified eight 'key lessons... that

⁶⁷ Nous Group, *Perspectives on the use of performance frameworks in the Australian federation: research commissioned by the COAG Reform Council*, 3 April 2014. The particular focus of this research was other policy areas (health, education and competition and regulation), but its findings are of relevance to homelessness funding.

⁶⁸ P 24.

⁶⁹ P 26.

⁷⁰ P 27.

⁷¹ Pp 17-18.

could inform future options for improving intergovernmental performance frameworks in Australia’:

1. There is value in maintaining an outcomes orientation wherever possible [50 per cent of respondents to the Nous survey agreed or strongly agreed that ‘a focus on high-level outcomes’ such as ‘Closing the Gap’ was effective in driving reform and decision-making].
2. ‘Less is more’ with respect to indicators.
3. Respect the distinction between different types of agreements.
4. Maintain the integrity of the reward payment structure.
5. Avoid the emergence of overlaps between reports on national outcomes.
6. Maximise the alignment of state, territory and Commonwealth priorities.
7. Identify and address differing expectations of jurisdictions.
8. Conduct rigorous preparatory work [emphasis added].

HA agrees that there is value in retaining a set of national outcomes for homelessness. However, we would emphasise that, in the current fiscal environment, such outcomes should be clear, simple, referable wherever possible to existing data sets (so as to avoid funds being diverted from service delivery)⁷² and practically achievable. The latter quality is more likely to be achieved with greater attention to the *medium* as well as the longer term.

The COAG Reform Council (CRC)’s *Lessons for Federal Reform 2008-2013* concluded that inadequate governance – lack of involvement of line ministers and agencies, limited focus on execution, waning interest in reform objectives over time and the absence of a ‘loop’ to feed evaluations of reform measures back into COAG decision-making – had undermined the COAG Reform Agenda. The CRC affirmed Deloitte Access Economics’ conclusions that:⁷³

The proliferation of NPAs has undermined simplicity and contributed to an increasing administrative and reporting compliance burden on State Governments, as well as muddying the waters of transparency and accountability. Many NPAs involved detailed monitoring of what was being implemented rather than a focus on interim or long-term outcomes. The view among both Commonwealth and state stakeholders was that the Commonwealth’s desire for maintaining accountability over transfers of funding to the states subverted the principle of using outcomes-based performance indicators very early on and has led to a focus on activity- and input-focus across many NPAs.

There is consensus that an outcomes-focus is the right principle to be pursuing, but it is also agreed that this is difficult to do well in practice. Timeframes for achieving these outcomes can be very long and not enough attention has been given to establishing an approach for assessing progress along the way, nor of reviewing appropriateness of measures in a systematic way...

Overall, this process has been hindered by a lack of evidence and understanding of the ‘program logic’ for different reform areas. This would require an understanding of the linkages between inputs, activities, outputs, interim outcomes and long-term outcomes and the ability to account for the

⁷² Measuring outcomes can be expensive, as the Productivity Commission commented in its *NFP* report at pp 100-101.

⁷³ The NAHA and other SPPs were outside of the scope of the [Deloitte review](#).

influence of external factors. The architecture of the initial NAs was originally designed to focus attention on this progression of interrelationship, but the extent to which this was achieved is mixed, and there has been no substantive move to redress this in the past five years.

The COAG report also said that, in some areas of the national reform agenda

[I]t is difficult to assess progress because the performance indicators are not appropriate and/or data are not available. This is the case, for example, in the area of housing supply and affordability...⁷⁴

Timely data are not available for tracking many of COAG's key priorities.

Further, while stakeholders agreed that performance reporting by the council is helpful, they did not consider it met expectations for accountability. Many argued that the uneven quality of performance indicators in the National Agreements and National Partnerships—including lack of connection to outcomes—reduced the effectiveness of the council's reporting.

The implementation of the IGA demonstrated this. In areas with relevant indicators and quality, timely data—such as NAPLAN to measure literacy and numeracy—performance reporting is a stimulus for change. It provides a focus for collaboration and improvement. But it is not effective where data are out-of-date or not fit-for-purpose (for example, for a number of measures in the housing and disability National Agreements).

Performance reporting for accountability fails completely where data are unavailable. For example, the council has special responsibility for reporting on outcomes in regional and remote areas. However, analysis of regional and remote areas is not effectively supported by the performance framework and in many cases the data are simply not available....⁷⁵

In the CRC's view, clear articulation of program logic was particularly important:

...Under the IGA, incentives for improved service delivery and outcomes often rely upon comparative analysis of performance and implications for reputation. A number of stakeholders, however, were disappointed that evidence and reputation had not been a more effective incentive for improvement. This point highlights the weakness of the evidence base and of the measures for monitoring and assessing performance.

Without a strong evidence base, governments will be tempted to move back to relying on inputs and outputs to measure performance rather than outcomes. The review found that this had happened under the IGA.

In some cases outcomes-based reporting will be a 'bridge too far' as it is difficult or even impossible to determine the contribution of reforms to measures of progress towards outcomes. This leaves an accountability gap, with no information—or very poor information—about whether progress is being made.

In these cases, it is better to monitor outputs or processes closely related to the desired outcomes (Stecher 2010, p. 75). This approach depends on prior work being done to map the program logic and understand the links between inputs, activities, outputs, interim outcomes and long-term outcomes.

⁷⁴ *Lessons for federal reform* p 15.

⁷⁵ pp 59-60.

In the absence of good outcomes, well-chosen measures of outputs and interim outcomes can provide confidence that progress is being made. Although this was allowed for under the IGA, it was often not done or not done well.

According to the CRC:

The review found the processes to evaluate progress and build an evidence base for improvements or future reforms could be improved. There are three opportunities to build the evidence base.

Build evidence to support stronger ‘program logic’

First, the evidence base needs to be developed to better understand the links between inputs, activities, outputs, interim outcomes and long-term reform outcomes. Good policy development is based on evidence of the reform activities or outputs which will lead to improved outcomes. This would also support the recommendation to sharpen performance reporting and accountability.

Strengthen the focus on good practice

Second, the national reform agenda provides many opportunities to identify innovative policy reforms and good practice and share these across jurisdictions to help drive continuous improvement...⁷⁶

Thirdly, the CRC endorsed the SCFFR’s original vision of National Partnership Agreements as vehicles for public accountability.

Transparency and stakeholder engagement

The Intergovernmental Agreement on Federal Financial Relations (IGAFFR) sought to increase public accountability for spending on outcomes agreed under it, by reference to defined outputs, performance indicators and benchmarks (see Appendix A). Ensuring progress towards outcomes is the shared responsibility of signatory governments, including local government. However, as the most recent iteration of the National Partnership Agreement on Homelessness (NPAH) recognises, the large number of housing and homelessness initiatives delivered by the not-for-profit (NFP) sector, progress cannot be achieved without co-operation from other parties⁷⁷ who are not at the table when COAG agreements are negotiated. This is despite research demonstrating the importance of sharing accountability for solving homelessness between mainstream services (most of which are delivered by governments) and the specialist services that NFPs deliver.⁷⁸

⁷⁶ P 63.

⁷⁷ The NPAH’s revised objectives clause now refers to the desirability of partnerships with ‘business, the not for profit sector and the community’.

⁷⁸ Gronda, Ware and Vitis, [What makes a difference? Building a foundation for nationally consistent outcomes measures](#), AHURI, June 2011.

HA welcomes COAG's recent reiteration of the importance of 'clearer lines of reporting and accountability to the public' and 'well-informed, open and constructive public debate' about how housing and homelessness services might best be delivered.⁷⁹ Without such a commitment, homelessness sector services, working under considerable client pressure, in eight jurisdictional policy contexts could be left bewildered about the significance to them and their clients of COAG agreements and funding allocations and related decisions.⁸⁰ Decisions to reframe radically the terms of National Partnership Agreements,⁸¹ for example, need to be clearly, specifically, publicly and immediately articulated to avoid uninformed speculation about their consequences for service delivery or their relationship to state and territory measures.

In HA's experience, not all state or territory governments are equally open with their local homelessness sectors about how (proposed) initiatives that stem from COAG agreements (eg sector reform initiatives or programs delivered 'in house' by state governments) are (to be) financed, or how effective those initiatives prove.⁸² This problem is most acute in NSW, where 'matching' state NPAH money has funded a large number of state government programs or services not having been subjected to the same public evaluation as Commonwealth-funded, NGO-run programs, and services discontinued with the advent of the 'Going Home Staying Home' reforms. There is even less accountability for states and territories in the area of housing. Unlike its predecessors,⁸³ the National Affordable Housing Agreement (NAHA) does not require state 'matched' funding or public reporting. There is concern in the homelessness and housing sector that the NAHA Specific Purpose Payment (SPP) is being used to maintain existing stock or fund positions in state housing departments,⁸⁴ rather than to build more social housing to match increases in population

⁷⁹ See [COAG Communiqué 10 October 2014](#).

⁸⁰ This critique of COAG is a general statement: see, for example, Blayden, [COAG](#), NSW Parliamentary Research Paper 6/13 pp 55-65, and the Australian Parliament's Joint Committee on Public Accounts, [Inquiry into National Funding Agreements](#) ch 5 and Senate Select Committee on the Reform of Australia's Federation, [Australia's Federation: an Agenda for Reform](#) ch 3. However, the homelessness sector feels this uncertainty very strongly because of its diffuse nature and its clients' vulnerability.

⁸¹ Such as occurred with the 2013-14 'transitional' NPAH and its 2014-15 successor.

⁸² For example, although some jurisdictions have published their own evaluations of homelessness initiatives, HA's member agencies have had access to state and territory NPAH annual reports late and through the Commonwealth and Victorian agencies have not seen that jurisdiction's NPAH report because no public version of it has been made available.

⁸³ See excerpts from the [Commonwealth-State Housing Agreement 2003](#) (CHSA 2003) in Appendix #.

⁸⁴ Shelter NSW has argued that:

Reporting on the financial flows to social housing and other housing assistance in NSW is not transparent. It is practically impossible for the public to determine how much additional support is provided from State revenue on top of the funding from the NAHA.

(*Submission to the NSW Legislative Council Inquiry into Social, Public and Affordable Housing*, 2014, p 17.) The Commonwealth presently provides \$1.2 billion annually to the states and territories through the NAHA SPP.

and need.⁸⁵ Similar concerns have been raised about state ‘asset-recycling’ of high-value social housing stock.⁸⁶

- It is important that any state or territory COAG instruments, such as NPAH ‘project plans’ and reports or evaluations under them, are made public much earlier than has been the recent practise. While some of HA’s members, particularly those in smaller jurisdictions, have access to those documents and/or input into drafts of them, others do not, and not all services are accorded both opportunities. Long delays in finalising and publishing those plans⁸⁷ or reports⁸⁸ not only make their content stale⁸⁹ but can leave services in the dark about what governments have developed on their, or their clients’, behalf.
- The value to governments of greater transparency in their dealings with the homeless sector extends beyond simply avoiding unnecessary miscommunication. If agencies are to become genuine partners in reducing homelessness, particularly in ways that save governments money,⁹⁰ they *need* and *deserve* more information and certainty on governments’ actions and plans than they are currently afforded.

⁸⁵ NSW Auditor-General’s Report to Parliament, *Making the best use of public housing 2013*

⁸⁶ NSW Legislative Council Select Committee on Social, Public and Affordable Housing, [Final Report](#), September 2014, p

⁸⁷ For example, the NPAH 2014-15 was signed in July 2014. Clause 17 requires states and territories to submit draft project plans by that date, and clause 18 states that ‘[t]he Commonwealth and States will ensure timely agreement of Project Plans within 21 days of their provision to the Commonwealth’. Months later, those plans still have not been published on the [Council on Federal Financial Relations’ website](#), despite DSS advising in Senate Estimates that only the NSW plan was outstanding.

⁸⁸ Similarly, despite containing considerable detail about services and their clients, state and territory NPAH reports do not seem to be circulated to those services. When HA obtained a set of the then most recent NPAH reports (2012-13 - other than the Victorian report, of which no public version was available), and circulated them to our Board and Council members, many commented that they had not previously seen those reports.

⁸⁹ This could be a particular concern where services are asked to submit (de-identified) client ‘case studies’ for state or territory NPAH reports, but clients ‘move on’ before those stories are published.

⁹⁰ Productivity Commission, [Contribution of the not-for-profit sector](#), 2010 ch 12.

Recommendations regarding transparency and stakeholder engagement

Consultation, publication, transparency and accountability:

Recommendation 4:

That governments consult with the homelessness sector about the proposed content of any intergovernmental agreements, partnerships or other instruments that permit or involve changes in homelessness policy, service delivery or funding, within timeframes that allow services (and, where relevant, their clients) to understand and prepare for those changes.

Recommendation 5:

That all COAG agreements, partnerships and associated instruments, including state implementation or project plans and reports required under them, be published *immediately* after they are entered into or take effect (whichever is applicable).

Recommendation 6:

That COAG agreements relating to housing or homelessness require that states and territories indicate in their Budget documents what elements of proposed housing and homelessness expenditure will be funded by:

- (a) monies obtained from the Commonwealth through an SPP or a NPA alone;
- (b) state or territory general revenue alone;
- (c) both Commonwealth SPP/NPA funds and state or territory general revenue, and the extent of each government's contribution;

and that, where state or territory funding is involved,

- (d) the extent to which the expenditure is funded by stock transfers, 'asset recycling' or redirection of program funds from other areas of housing or homelessness.

Results-driven accountability - directing funding towards the achievement of outcomes, objectives and indicators

The diligent pursuit of social outcomes is worth undertaking, but COAG efforts in this direction to date seem to have under-estimated the complexity of the task and the importance of adequate preparation. The study by Stecher *et al* of ‘performance-based accountability systems’ (PBASs) across five public service delivery sectors in the USA concluded that such systems could succeed in optimal, but rare, conditions featuring:

- a goal that is widely shared (by contrast, as discussed below, some of COAG’s housing and homelessness goals ‘miss the mark’, revealing a lack of clarity about what governments want to achieve, and perhaps an underlying lack of commitment to joint goals);
- measures that are unambiguous and easy to observe (many of COAG’s housing indicators are not, and others have not been developed);
- incentives that apply to individuals or organisations that have control over the relevant inputs and processes (local councils have not been offered incentives to bypass ‘NIMBY’⁹¹ or other unreasonable objections to affordable or low-income housing developments; states and territories have not been offered incentives to force local government’s hand; tax incentives do not focus investors’ interest in the ‘affordable’ end of the housing market and tenanted properties as opposed to vacant ones, and competitively-allocated capital funds in the homelessness field have been accompanied by cuts to other services;⁹²
- incentives that are meaningful to those being incentivised (many state or territory reporting frameworks continue to reward client throughput rather than service delivery quality of meaningful changes in client circumstances; incentives for states and territories to build new social housing is curtailed if they have historic housing debts to the Commonwealth);
- few competing interests or requirements (many government policies, including those that raise revenue and affect population levels, are inconsistent with the objective of affordable housing for everyone and an end to homelessness); and
- adequate resources [for their] design, implement[ation] and operat[ion]⁹³ (the relationship between what states or territories do with federal money – or require funded agencies to do with their share of it – and population-level ‘outcomes’ is

⁹¹ ‘Not in my backyard’.

⁹² As happened in the ACT, the complaint ‘Common Ground got all the money, when Common Ground facilities were initially developed.

⁹³ [Towards a Culture of Consequences: Performance-Based Accountability Systems for Public Services](#), RAND Corporation, 2010 p 9.

poorly understood,⁹⁴ agreed results are expressed in terms of ‘outputs’ without clear articulation of the program logic linking them to ‘outcomes’, data collection is partial or a poor fit for indicators, or good data is not used for evaluative purposes or to inform continuous program improvement).

Stechter *et al* also caution that, even if all of these conditions are present, ‘PBASs are sufficiently complex that initial success is rare, and the need for modification should be anticipated’⁹⁵ (as it appears to be in Australia). The list of obstacles includes:

- lack of experience (true of homelessness at the intergovernmental level in Australia);
- lack of supporting infrastructure (with abolition of the relevant COAG Council and Reform Council there appears to be none);
- unrealistic timelines for solving complex problems (eg the initial commitment to reduce homelessness by 7 per cent within a five-year period despite the fact that population growth already outstripped service delivery);
- failure to communicate; and
- stakeholder resistance (which can afflict all participants, including governments).⁹⁶

State and territory accountability to their own electorates for how they spend both state or territory and Commonwealth funds is as important as Commonwealth accountability to taxpayers for how federal money is spent. Sanctions, like threats to expose reductions in overall spending in the *Report on Government Services*, or to allow this information to ‘inform future arrangements’⁹⁷ – are ineffective, as they risk affecting service delivery to vulnerable people.⁹⁸

An ‘increased state and territory accountability’ reward payments program included in housing and homelessness agreements could overcome the present accountability deficits.⁹⁹ For example, state and territory governments could be rewarded for quantifying in their Budget documents what money of their own, as well as Commonwealth funding, they spend on housing and homelessness. It would be useful if states and territories would specify:

⁹⁴ This is the case for other COAG agreements

⁹⁵ *Ibid* p 8.

⁹⁶ *Ibid* p 21.

⁹⁷ eg as under cl 27 of the NPAH – See excerpt in Appendix 3.

⁹⁸ There are also concerns in the homelessness sector about the accuracy of state social housing data.

⁹⁹ Reward payments have not always been regarded as successful in the COAG context, but those agreed upon in 2008 were general, rather than linked to specific reforms (see the CRC’s *Lessons for federal reform: COAG reform agenda 2008–2013* and the Deloitte report upon which it is based). By contrast, HA proposes that such payments be relatively small and linked to the taking of easily-identifiable processual steps. As discussed below, reward payments could also be used to improve data quality.

- what expenditure is funded out of
 - general revenue,
 - National Special Purpose Payments (SPPs),
 - Commonwealth funding under a National Partnership Agreement (NPA), or
 - ‘matched’ state or territory funding that the NPA requires; and
- how much of each type of expenditure has resulted in new housing supply, particularly new supply of social or affordable housing;¹⁰⁰ and
- how developments in one area of housing or homelessness affect existing funding or stock levels in others, eg where an increase in community housing results from a transfer of management of public housing, where buildings are ‘recycled’ to pay for service delivery, or where program funds are reallocated to positions in state housing departments.

¹⁰⁰ The Steering Committee on the Review of Government Services (SCROGS) does not ask state and territory governments to identify separately their capital spending on *new* dwellings or redeveloping existing sites to expand the number of dwellings, rather than on repairing existing dwellings, and that spending cannot be quantified in any meaningful way from the *ROGS*.

Recommendations for results-driven accountability – direct funding
Directing funding tying SPP, re-allocation and incentivising

Recommendation 7:

That future indexation of the NAHA SPP is tied to states and territories undertaking full housing needs assessments, based on their present and likely future populations.

Recommendation 8:

That the Commonwealth (consider) offer(ing) additional incentive payments to expedite state and territory development or planning changes that will improve supply of well-located, low-cost housing, particularly housing that is suitable for single and older people.

Recommendation 9:

That the Commonwealth consider offering additional incentive payments to encourage adequate growth and distribution in social housing stock over defined periods of time, in each jurisdiction, to keep pace with population increases.

Recommendation 10:

That the Commonwealth consider re-allocating a proportion of the NAHA SPP to community housing providers for capital works via a competitive tender process that focuses on increased housing supply.

Data collection, collation and analysis

A crucial preliminary step to better measurement of progress towards housing and homelessness outcomes involves identifying the data required for that purpose. The data collected must be of sufficient quality and comparability to enable change in indicators over time to be reliably measured. The COAG Reform Council (CRC)'s *Lessons for Federal Reform 2008-2013* noted the need for a strong evidence base and an 'accountability loop' to feed evaluations of reform measures back into COAG decision-making:

[I]t is difficult to assess progress because the performance indicators are not appropriate and/or data are not available. This is the case, for example, in the area of housing supply and affordability¹⁰¹

The CRC also observed that:

Performance reporting for accountability fails completely where data are unavailable.

In areas with relevant indicators and quality, timely data...performance reporting is a stimulus for change. It provides a focus for collaboration and improvement. But it is not effective where data are out-of-date or not fit-for-purpose (for example, for a number of measures in the housing and disability National Agreements).¹⁰²

The homelessness sector is fortunate to have a national data collection, the Specialist Homelessness Services Collection (SHSC), maintained by the Australian Institute of Health and Welfare (AIHW). However Homelessness Australia believes there is potential for greater accuracy and effectiveness in the collection of homelessness data.

What to measure

'Outputs' 1 (number of people who are homeless or at risk of homelessness who are assisted to secure and sustain their tenancies) and 2 ('number of people who are assisted to move from crisis accommodation or primary homelessness to sustainable accommodation') could become meaningful indicators if qualified by others that measure the maintenance of housing over time by people so assisted and the overall prevalence of homelessness *outside of* the homelessness service system. For example, COAG could agree that a more complete picture of progress towards ensuring that 'people who are homeless or at risk of homelessness achieve sustainable housing and social inclusion' would be obtained if:

¹⁰¹ The COAG Reform Council (CRC), *Lessons for Reform 2008-2013* p 15.

¹⁰² The COAG Reform Council (CRC), *Lessons for Reform 2008-2013* pp 59-60.

1. The *number* and *proportion* of social housing dwellings newly allocated to people in the greatest need¹⁰³ remains constant or increases;

and

2. The *proportion* of people in the greatest need to whom social housing is allocated who sustain those tenancies 12 months later remains stable or increases.

and

3. The *proportion* of people whom SHSs provide with assistance to sustain a tenancy or other housing, and who have sustained that tenancy or other housing at the end of their SHS support period, remains stable or increases;

and

4. The *number* and *proportion* of 'rough sleepers' or people living in temporary accommodation when they sought SHSs assistance who were better housed (ie, living in rented, rent-free or privately owned accommodation) at the end of their SHS support period, remains stable or increases.

(HA recommends that this indicator be extended to require improvement in the position of couch-surfers as well.)

but

5. The *proportion of the population* estimated to be experiencing
 - homelessness in general; and
 - 'rough sleeping';
 - 'couch surfing';
 - boarding house dwelling;
 - severe crowding;
 - severe crowding in remote or very remote Australia; or
 - severe crowding in major cities or other growth areas;

decreases between Censuses.

and

6. The proportion of the population estimated to be living in other marginal housing¹⁰⁴ decreases between Censuses.

¹⁰³ Those that, at the time of allocation, are homeless, in housing inappropriate to their needs, in housing that adversely affects their health or jeopardises their life and safety – or households with very high rental costs: AIHW, *Housing Assistance in Australia 2014* Box 4.5 'Need definitions'.

How to measure change in revised indicators

Data from AIHW's National Housing Assistance Data Repository (NHADR), which is reported in the annual publication *Housing Assistance in Australia*, provides a measure of the first indicator and a partial measure of the second. For the proportion of social housing newly allocated to people in the greatest need, see *Housing Assistance in Australia 2014* Figure 4.1 and Table 4.1.

For the proportions of 'greatest need' clients who sustained social housing 12 months after being allocated such a tenancy, see *Housing Assistance in Australia 2014* Table 6.2. With the maturation of the Specialist Homelessness Services Collection (SHSC), it may also be possible to create an additional proxy measure of housing sustainment by matching three years' data on to ascertain whether particular SHS clients who 'exited' the homelessness service system for housing have not returned, or returned within a particular period, seeking assistance in obtaining accommodation.¹⁰⁵

Proxy measures for the third and fourth indicators can also be found in the (SHSC), which measures:

- numbers of SHS clients who were identified as needing assistance to sustain housing tenure and whose needs for that assistance were met (see the *SHSC Annual Report 2012-13* Table S4.14 for the national figures); and
- those clients' housing status at the beginning and end of support (see Table S4.15 for the national figures).¹⁰⁶

The SHSC also breaks this data down according to whether the clients were homeless or at risk.

The final two indicators can be measured using ABS homelessness estimates from the 2016 Census.

'Output' 3 ('number of households assisted in social housing') could, if reframed, also become a meaningful indicator of progress towards the new outcome proposed above ('Supply of well-located affordable or social housing of a reasonable standard meets demand from people who need to occupy that housing'). An indicator of this kind should be expressed to relate to growth in population and demand, and possibly also in a manner that reflects overall housing stock levels.

¹⁰⁴ Other crowded dwellings, other improvised dwellings and caravan parks: see [ABS, 2049 Census of Population and Housing: Estimating Homelessness 2011](#), Table 2 Persons in other marginal housing, selected characteristics, 2001, 2006 and 2011.

¹⁰⁵ It will be necessary to remove data for clients who have died, been imprisoned etc, as well as to control for homelessness *outside of* the service system as per indicators 5 and 6.

¹⁰⁶ Data in these tables can be cross-referred using the SHSC data cubes.

Considering the high proportions of people in ‘greatest need’ who are now being allocated public housing, it is critical that the number of social housing dwellings increases in a manner that at least matches population increase, and preferably in a manner that matches demand unless other ways of addressing some of that demand (eg an increase in affordable private housing for older people) can be found.

However, progress towards what might be considered one of the most important NAHA outcomes – ‘people have access to housing through an efficient and responsive housing market’ – has never been measured properly, largely due to COAG’s delay in developing an appropriate indicator. The CRC adopted a proxy indicator developed by the former National Housing Supply Council (NHSC), but the utility of that measure is uncertain now that both bodies have been abolished.

Improving participation and reporting rates

Homelessness Australia supports the Commonwealth’s interest, expressed in the 2014-15 NPAH,¹⁰⁷ in near-universal SHSC participation for funded services.¹⁰⁸ However, better national data must never come at the cost of poorer local service delivery or compromised relationships with ‘mainstream’ service providers or non-government funders.¹⁰⁹ It may be possible to draw services that stand outside of the SHSC into it without these negative side-effects: for example, by providing additional resources and training to help small, front-line services in areas of high and challenging need, to create an evidence base demonstrating the value of their services. Homelessness Australia is willing to assist in any way we can with such an undertaking, which would be preferable to liberal grants of ‘Specialist Homelessness Information Platform (SHIP) exemptions’, particularly for agencies operating in areas where properly-collected evidence is likely to show that *more* homelessness services are required (eg in remote or very remote Australia).¹¹⁰

SHSC data submission rates in 2012-13 exceeded 90 per cent,¹¹¹ with the client-tracking statistical linkage key (SLK) being recorded for 94 per cent of support periods.¹¹² Although this represents an improvement on the preceding year,¹¹³ HA’s member services report that client SLKs are sometimes incorrect. Improvements could also be made in data quality.

¹⁰⁷ CI 20 of the NPAH – see Appendix B.

¹⁰⁸ For example, in NSW in 2012-13, about 50 ‘in scope’ agencies did not participate, did not submit any data or were not ‘fully responsive’ for their entire operating period in 2012-13: see Table A1 ‘Agencies in-scope and participating in the SHSC, 2012-13’, [Specialist Homelessness Services 2012-13](#) p 116.

¹⁰⁹ Homelessness agencies were ‘in scope’ for the SHSC in 2012-13 if they received government funding for four months of the year.

¹¹⁰ See AHURI, [The spatial dimensions of homelessness 2001-2011](#), 2014.

¹¹¹ Appendix A, ‘Data Quality Statement’, [Specialist Homelessness Services 2012-13](#), p 113. However, this still means that about 150 agencies Australia-wide are not submitting full, or any, SHIP data.

¹¹² See also p 3 of the report.

¹¹³ See [Specialist Homelessness Services 2011-12](#), p 105.

Although some questions are now yielding much better answers than previously,¹¹⁴ many still go unanswered for tens of thousands of clients.¹¹⁵ This problem is particularly apparent in Victoria, where services are recorded as assisting 38 per cent of all clients nationally,¹¹⁶ presumably because of the difficulties of comprehensive reporting in high-volume agencies such as that state's 'entry points', but perhaps also because of those entry points' late 'SHIP' debut.¹¹⁷

AIHW has pointed out that, in 2012-13:

- complex questions about clients' prior incarceration or treatment were not answered in more than half of all cases nationally;
- more straightforward questions about prior¹¹⁸ or subsequent¹¹⁹ dwelling type were also left blank for more than a quarter of clients; and
- agencies did not nominate a *main* reason for seeking assistance in 15 per cent of cases (more than 39,000 clients).¹²⁰ This particular omission is understandable given the difficulty of unravelling complex causes of homelessness.

Supplementary tables to the 2012-13 SHSC annual report also reveal missing information regarding:

- whether or not a client had been homeless in the previous month (for almost 85,000 clients, 45 per cent of them in Victoria);
- main source of income of more than 59,500 clients, more than half of them in Victoria,¹²¹ and labour force status of a similar number, 54 per cent whom were in Victoria;¹²²
- age, sex, indigenous status (or a combination thereof) for tens of thousands of clients nationally;¹²³
- country of birth (almost 34,000 clients, 57 per cent of them in Victoria);¹²⁴

¹¹⁴ For example, there was a steep drop in the number of people for whom a 'dwelling type first reported' was not recorded in 2012-13 compared with 2011-12.

¹¹⁵ leaving AIHW to apply a compensating imputation strategy: see Appendix B of [Specialist Homelessness Services 2012-13](#).

¹¹⁶ 92,462 out of 244,176.

¹¹⁷ Former Transitional Housing Managers (THMs) were not required to submit data to the earlier National Data Collection Agency (NDCA).

¹¹⁸ Almost 64,000 clients: see Table S2.11.

¹¹⁹ More than 71,000 clients: see Table S3.1. Just 24,000 of these clients (34 per cent) were in Victoria: Table VIC3.1.

¹²⁰ See p 118 and Table S2.14.

¹²¹ Tables S2.8 and VIC2.8.

¹²² Tables S2.9 and VIC2.9. The 'educational enrolment status' of more than 87,000 clients (41,000 of them in Victoria) was also not recorded: Tables S2.10 and VIC2.10.

¹²³ See tables S2.3, S2.1 and S4.2 (and see also Table S4.8).

- details of the living arrangement of clients who presented alone (about 41,000 clients, more than half of them in Victoria);¹²⁵
- details of how clients were referred to a service (almost 35,000 clients, 42 per cent of them in Victoria);¹²⁶
- reasons for seeking assistance (about 32,000 clients, 37.5 per cent of them in Victoria);¹²⁷ and
- reasons why a support period ended (almost 15,800 clients, only 26 per cent of them in Victoria).¹²⁸

Missing information also means that we do not fully understand the type/profile/what kinds of people(who) are refused assistance, what their housing circumstances are when they seek assistance, the services that they need and why (where relevant) these cannot be provided.¹²⁹ Yet some of this information could provide important insights into the prevalence of homelessness *outside of* the service system,¹³⁰ the effectiveness of other interventions (eg priority allocation of public housing to people with high needs, including those who are homeless) or the types of complementary SHS assistance required to support those interventions effectively.

Limitations on the 'front line'

Admin is always the last to get done, however I think this database makes that not as cumbersome as it was in the past.

- NSW youth worker

In HA's consultations for this paper, a Victorian domestic and family violence worker expressed the following widely-held views about reasons for under-reporting in 'SHIP' and its present functionality:

It may well be that there is an issue with the data reported on SHIP – it is a sound enough system but very time consuming to do well. In my experience, case managers understand the need for good data but will prioritise face-to-face work with crisis clients if they must choose. Services are poorly-enough funded for case management and there is virtually no allowance for data entry to

¹²⁴ In 2012-13, the number of clients for whom a country of birth was missing or recorded as 'don't know' or 'not applicable' was in each case larger than the aggregate numbers of clients from each of 12 world regions of birth (other than Australia).

¹²⁵ Tables S2.6 and VIC2.6

¹²⁶ Table S2.7.

¹²⁷ Tables S2.13 and VIC2.13. This is not disproportionate to Victoria's overall share of clients.

¹²⁸ Table S2.23. Just 4000 of these clients, or 26 per cent, were Victorian: see Table VIC2.23.

¹²⁹ Tables S6.1, S6.3, S6.5, S6.6 and S6.7.

¹³⁰ For example, the number of children reported to be living in boarding houses in 2012-13 was much larger than in 2011-12. It is not known how much of this increase can be attributed to better reporting of 'dwelling type first reported' and how much to higher rates of boarding house dwelling among families with children.

this extent. Some agencies do their case plans on SHIP, which provides extra info, some use internal planning, it is not required *per se*. Statistical outcomes are there[fore] effected.

A NSW youth service manager also commented:

The Accommodation (for agencies with crisis/ transitional housing attached to their packages) reporting [of services provided, eg showers, laundry] in 'Notes' on a daily basis is also extremely time consuming and needs to be simplified – why do we even have to enter all this when we already record when young people come into our accommodation and go out again?

We can't record when we secure housing for young people external to our agency's accommodation types (eg in the private market). Being able to do this would be extremely beneficial, particularly with the push away from social housing and towards greater engagement with the private sector. For example, we got nearly 200 young people into secure external accommodation last year and about 70 per cent of those tenancies were in the private market. We keep an external database on these but they're hard to report on in CIMS/SHIP. 'Accommodation referred' doesn't capture the amount of work involved in negotiating with private REAs etc. It would be easier to have a specific option that recognises this work. 'Accommodation referred' could just mean I made a phone call to a housing provider and that was it.

Also, there is no data recorded on early intervention and community engagement strategies which is a huge part of our sector's work – maybe even just a tick box to identify this is a service type would be beneficial?

Some simple steps that could be taken to improve 'SHIP' functionality, and to ensure that it allows SHSs to record the full scope of their work, eg:

- adding some simple, generic questions about early intervention work not specific to clients, such as SHSs can now report their informal contacts,
- increasing options for recording support provided in the form of assistance to secure private housing;
- offering a wider range of 'tick the box' options, for example for case-management goals, outside of the case management function,
- considering whether better linkages are possible between 'SHIP' and other case management programs.

In HA's consultations, some concerns were also expressed about the quality of data collected by the open-ended question about whether 'case management goals have been met' particularly as not all SHSs are required to answer it.

Raised doubts about the utility of SHSC questions relating to 'case management'.

In Victoria, the quality of answers to questions about case management – a service not offered by system entry points – may be improved if an additional option of answering ‘service not offered’ to the question whether or not a client has a CM plan were available.

There is a case for adjusting some SHSC questions to take account of the limited role played by some services. For example, it should be possible to answer the question about whether a client has been ‘case managed’ by indicating that this is not a service that entry points normally offer.

Is there a relationship between poor housing affordability and sub-optimal SHIP data reporting?

HA also is concerned about a possible relationship between poor response rates or ‘Other’ answers in ‘SHIP’ and the rising pressure on SHSs brought about by poor housing affordability. Rather than waste valuable time that could be spent on clients whom they *can* assist, SHSs appear to be recording sketchy details for clients with whom they have limited dealings – typically those who seek assistance simply because their limited financial resources mean that they cannot afford accommodation of a reasonable standard, which SHSs are also increasingly hard-pressed to find.

If SHSs are under-reporting details of clients who seeking assistance for reasons associated with housing being unaffordable, a way of dealing with this pattern may be to create alternative ways of recording relatively fruitless encounters between services and these people, eg by allowing them to be registered as something other than clients. Queensland services record in their state performance and output reports any significant levels of ‘informal contacts’. It is certainly desirable that *unmet non-client* demand be captured better than it presently is in other jurisdictions.

In the discussion that follows, reference is made to data extracted from AIHW’s SHSC data cubes for 2011-12 and 2012-13, published in mid-2014. Unlike much of the data that AIHW publishes in its annual reports on this collection, data in these cubes has not been adjusted to take account of non-responses. It therefore undercounts actual client numbers, and the presentation of it here should be taken to indicate trends rather than to show exact numbers.

More people are seeking assistance for financial, housing affordability or housing quality reasons

Despite the ongoing presence of vulnerable cohorts in the SHS user population,¹³¹ the balance of *client* demand is moving away from people traditionally assisted by SHSs towards those who are simply unable to afford proper housing. AIHW has estimated that, in 2012-13, almost 95,000 people cited one of four reasons associated with the cost or quality of housing – financial difficulties, housing affordability stress, housing crisis or inadequate or inappropriate dwelling condition – as their main reason for seeking assistance from a SHS (see Figure A). This was an increase of more than 10,500 clients on 2011-12, outstripping the total estimated increase in client numbers (7747).

The rising numbers of clients citing financial, housing affordability/stress or ‘inadequate or inappropriate dwelling conditions’ as ‘main reasons’ do not simply reflect improved reporting, because the number of clients for whom an ‘other’ main reason was cited also increased in 2012-13 (Figure A). Together, these four reasons motivated 47% of all clients presenting to SHSs for assistance in 2012-13 for whom a main reason was provided,¹³² whereas in 2011-12 they accounted for just 43%.¹³³ Some of this change is positive, because it reflects the broader range of options open to victims of domestic or family violence:¹³⁴ estimated numbers of SHS clients for whom ‘Domestic or Family Violence’ was the main reason for seeking assistance declined by more than 2500 between 2011-12 and 2012-13. However, increased demand for housing affordability assistance can detract from SHSs’ ability to deal adequately with client needs based on even greater vulnerabilities. For SHSs to be able to do their work with vulnerable clients properly, alternative provision urgently needs to be made outside of the homelessness service system for the accommodation and tenure needs of low-income people without complex needs.

¹³¹ See AIHW’s [Housing Outcomes for Groups Vulnerable to Homelessness, 1 July 2011 to 31 December 2013](#).

¹³² A main reason was reported for just under 205,000 clients.

¹³³ These percentages are taken from the AIHW annual report tables cited in Figure A.

¹³⁴ eg ‘Safe at Home’ programs like those now operating in most states.

Figure A:

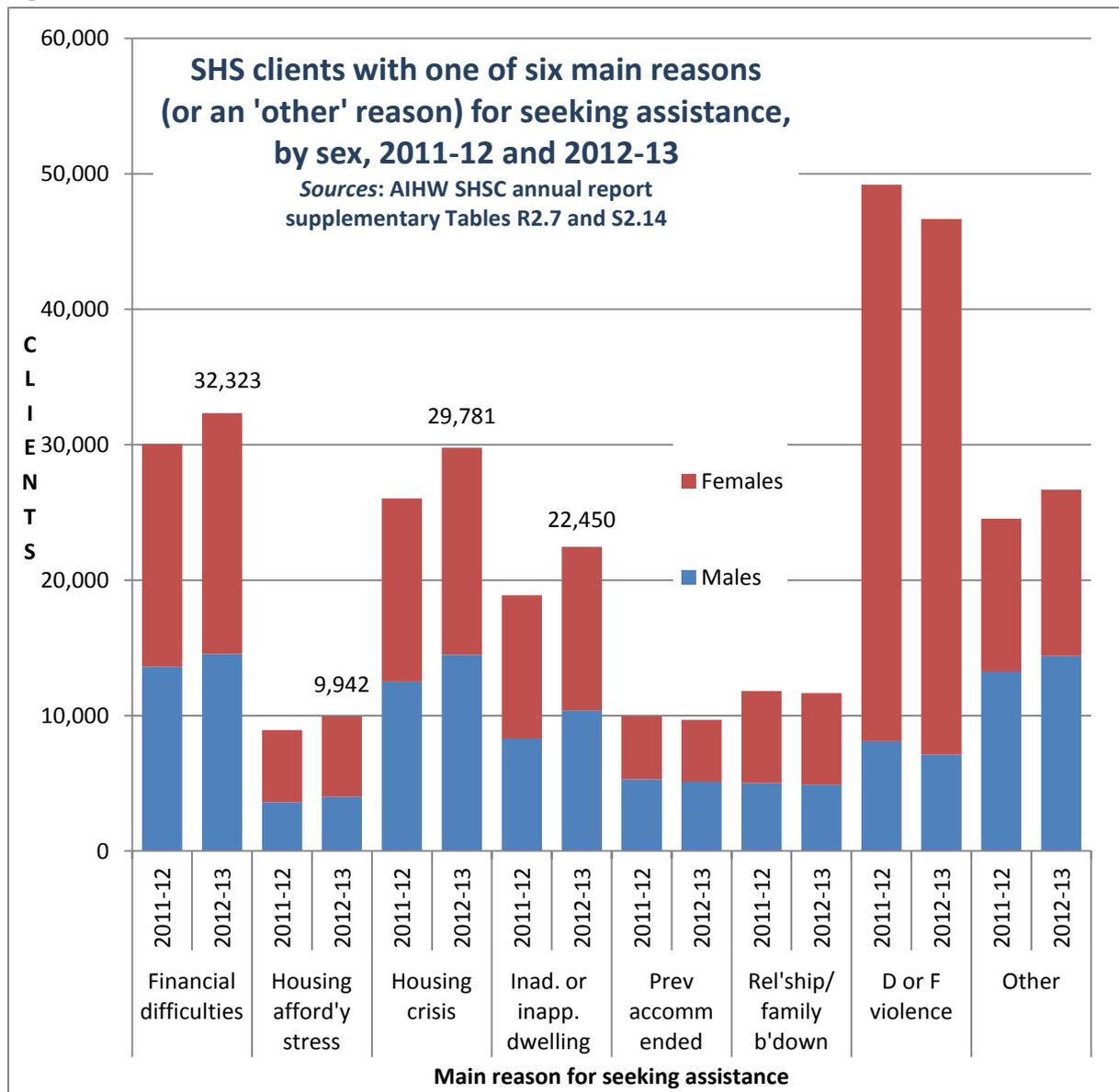
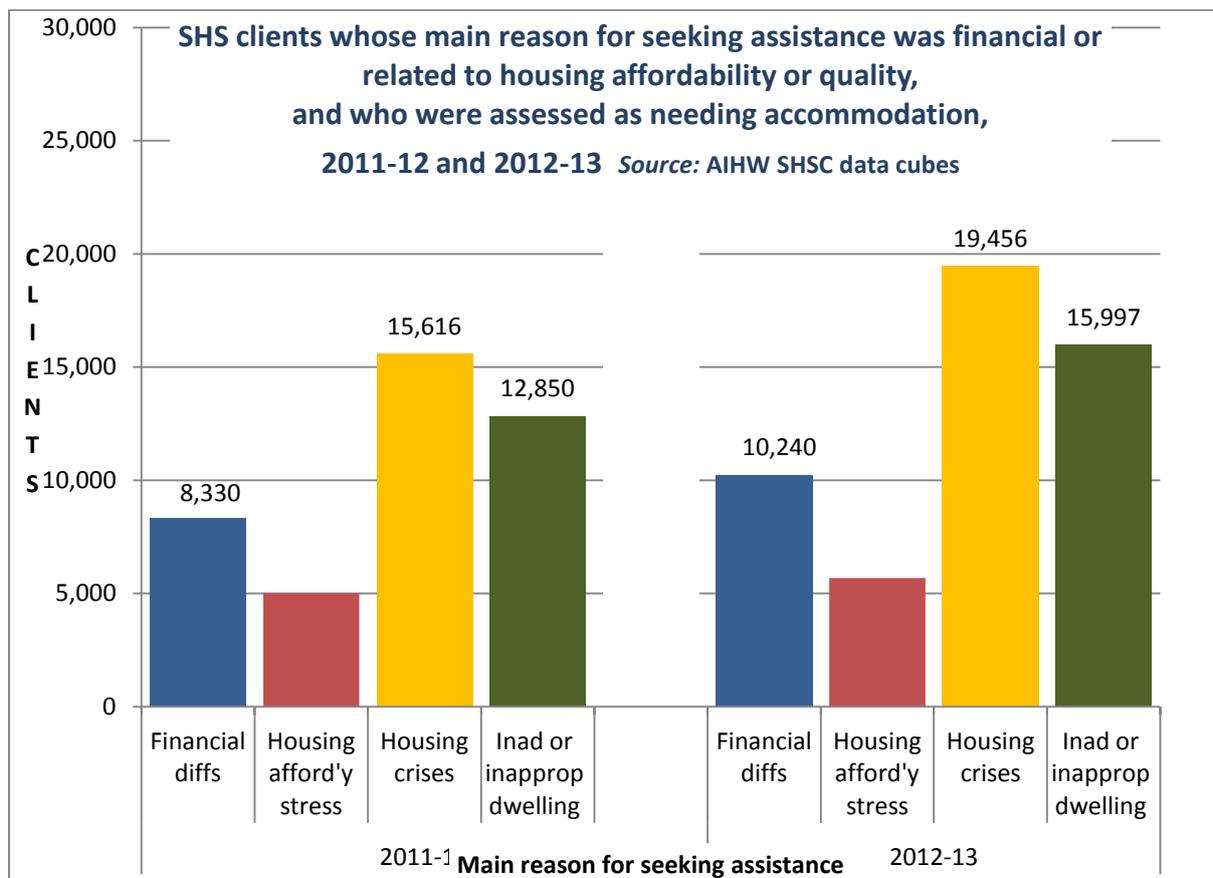


Figure A shows, in 2012-13, the four financial or housing affordability/quality reasons identified above accounted for nearly 10,000 additional clients assessed as needing accommodation.

Figure B:



Forty per cent of that increase occurred in Victoria, where at least some of it at least might be attributable to the operation of system entry points (Figure B). However, there were also noticeable increases in the numbers of people seeking assistance for 'housing crises' or 'inadequate or inappropriate dwelling conditions' in SA, Qld and NSW, and a small increase in the numbers citing financial reasons in WA. Most of these increases do not appear to be attributable to better reporting of clients main reasons for seeking assistance: numbers of clients reported as presenting for an 'Other' main reason who were assessed as needing accommodation remained relatively stable outside of Victoria and the ACT.

Figure C:

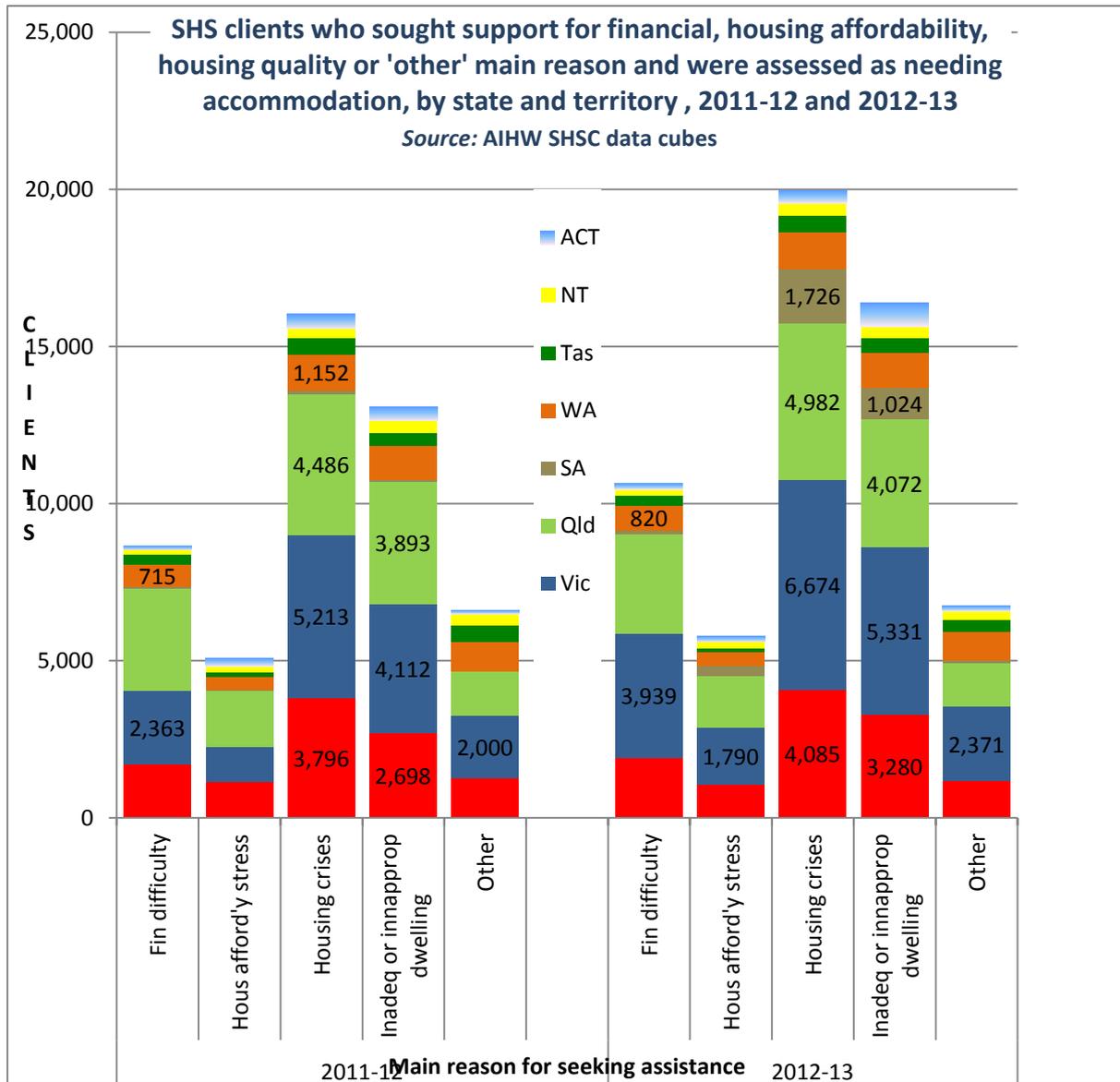
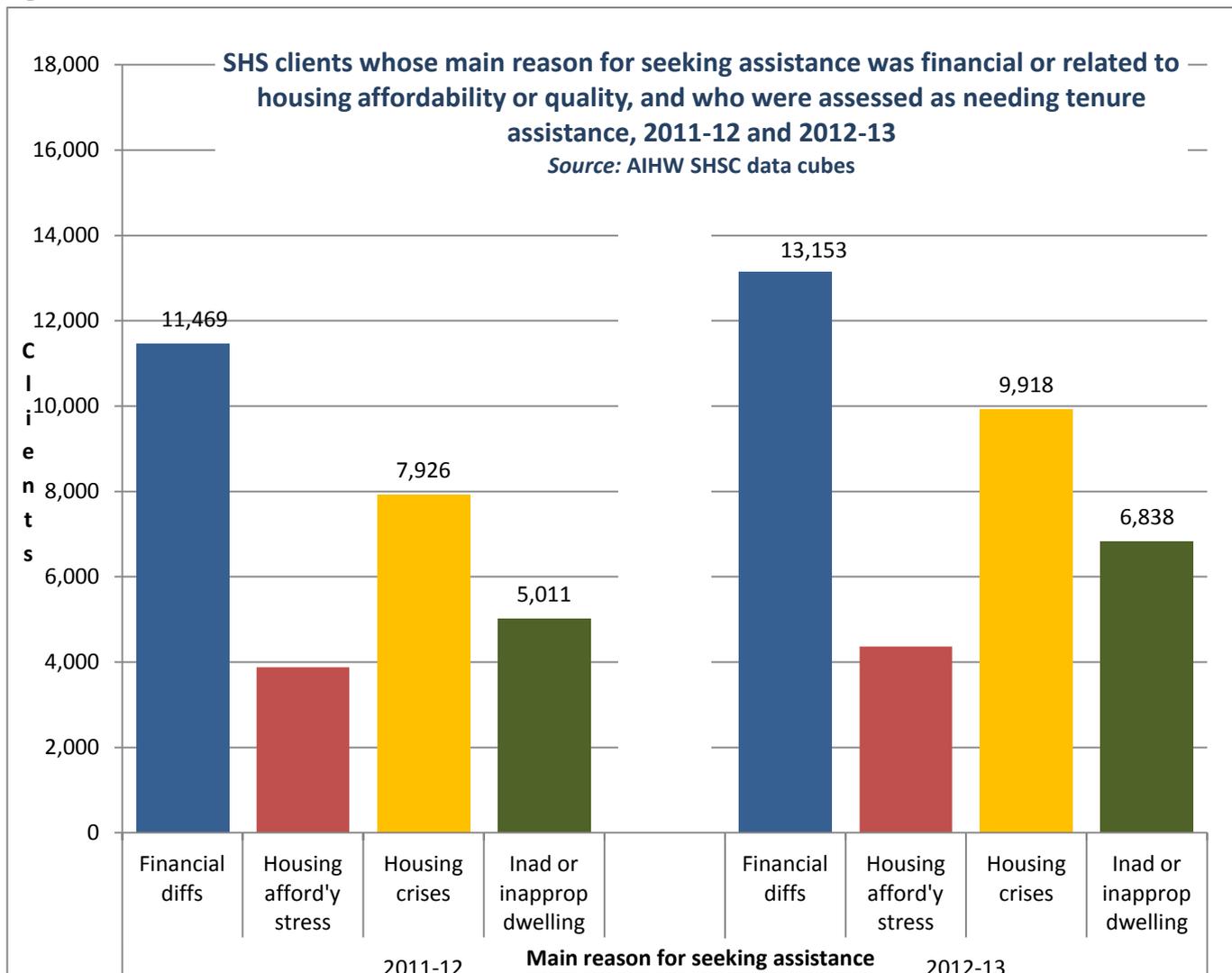


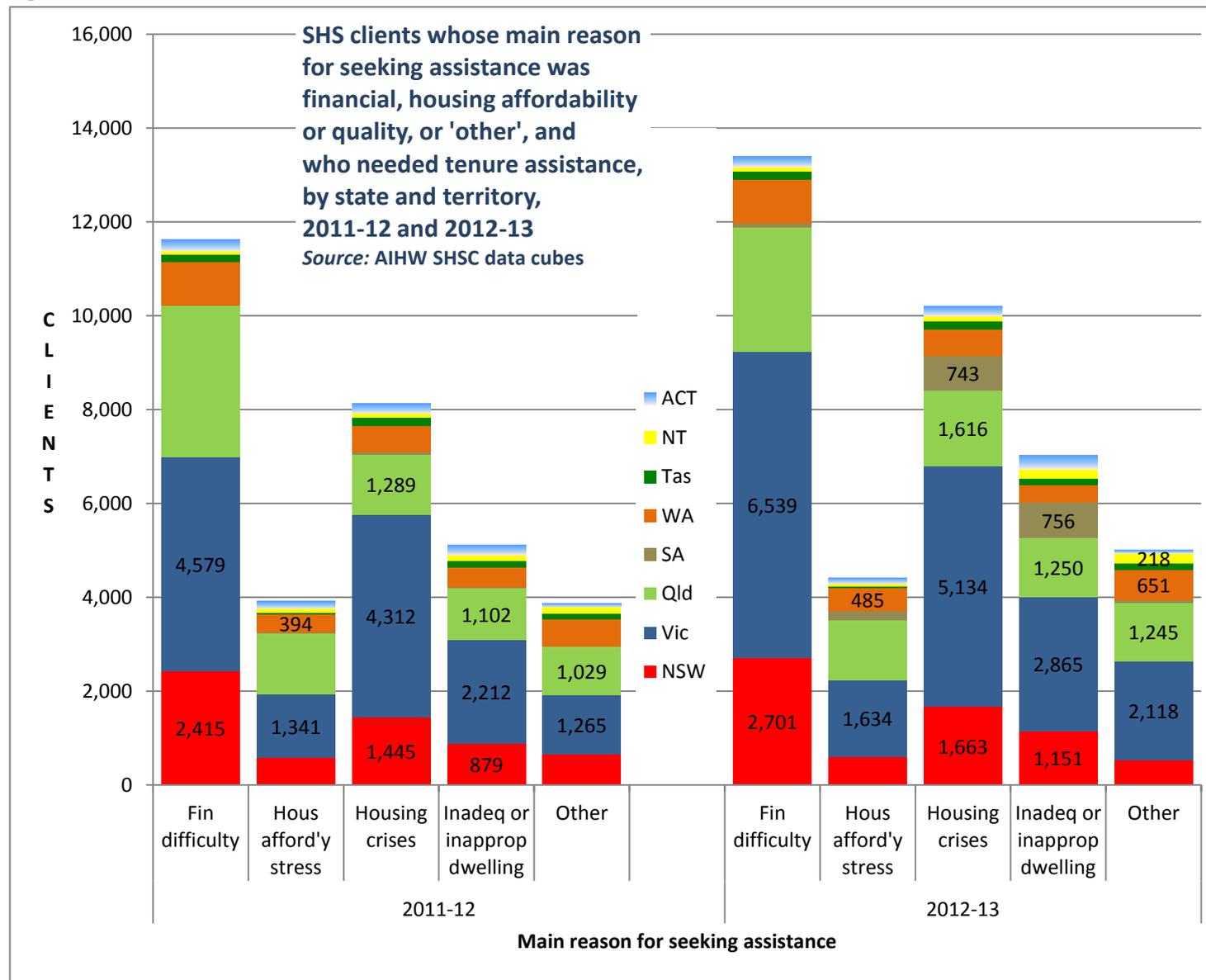
Figure C shows, of the clients whose main reason for seeking assistance was associated with the four financial or housing affordability/quality 'main reasons', the number assessed as *needing tenure assistance* also increased by almost 6000.

Figure D:



The increase was mainly in Victoria, but there were also pronounced jumps in the numbers of South Australian (and, to a lesser extent, NSW) clients needing tenure assistance whose main reasons for seeking assistance were ‘housing crises’ or ‘inadequate or inappropriate dwelling conditions’ (Figure D). Better reporting of ‘main reasons’ seems unlikely to have explained these increases: as Figure A shows, the number of clients in need of tenure assistance whose main reason for seeking it was reported as ‘other’ also rose.

Figure E:

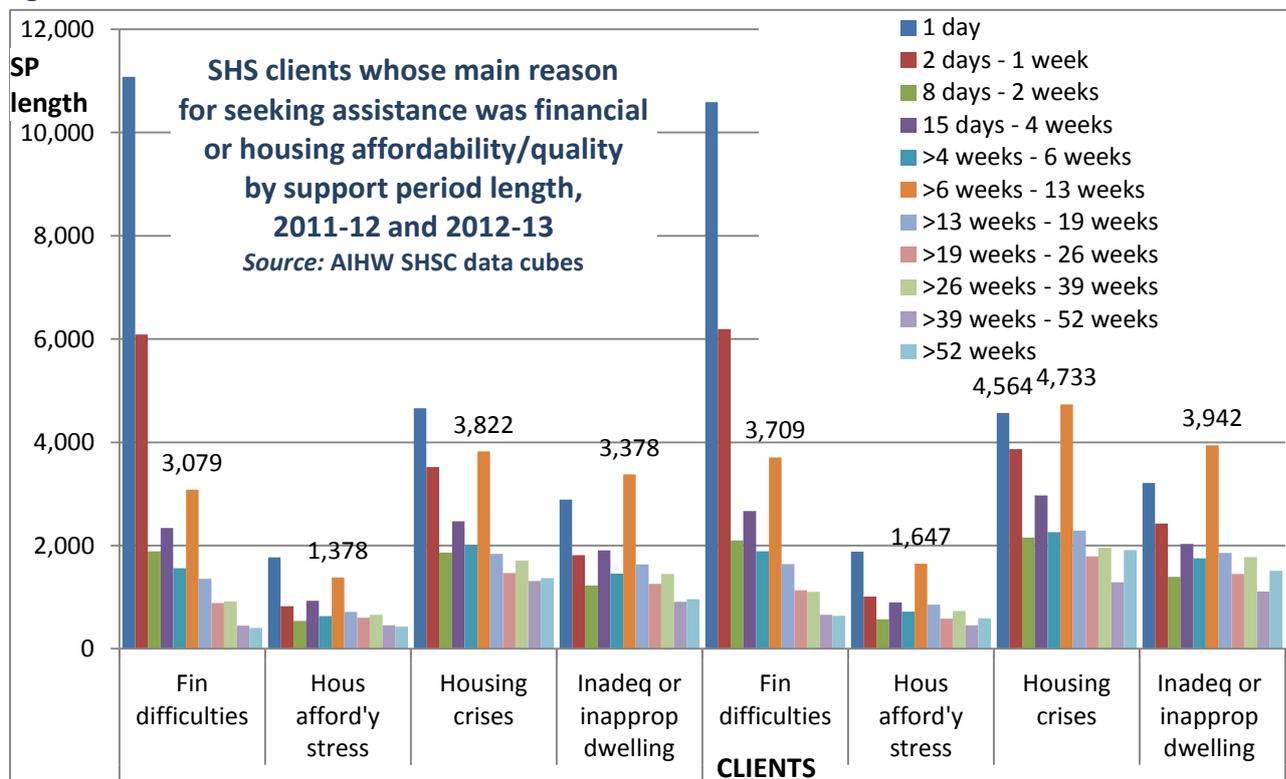


As demand for social housing continues to outstrip supply and many low-income people are forced into an increasingly inhospitable private rental market, SHS clients who present with financial or housing affordability or quality issues who are assessed as needing accommodation are also more likely to need tenure assistance. However, in 2012-13, more than 18,000 of the 34,276 clients assessed as needing tenure assistance for one of the four main financial or housing affordability or housing quality reasons were not among the 51,374 assessed as in need of accommodation for such a main reason. In 2012-13, about 70,000 people Australia-wide (29 per cent of all SHS clients, or a group the size of the population of Bundaberg) were assessed as needing accommodation and/or tenure assistance for a main reason related to their financial circumstances, their ability to afford housing or the inadequacy or inappropriateness of their dwelling conditions. This group

accounts for nearly three-quarters of all people who sought assistance for those four reasons, and 34 per cent of all clients for whom a 'main reason' was reported.

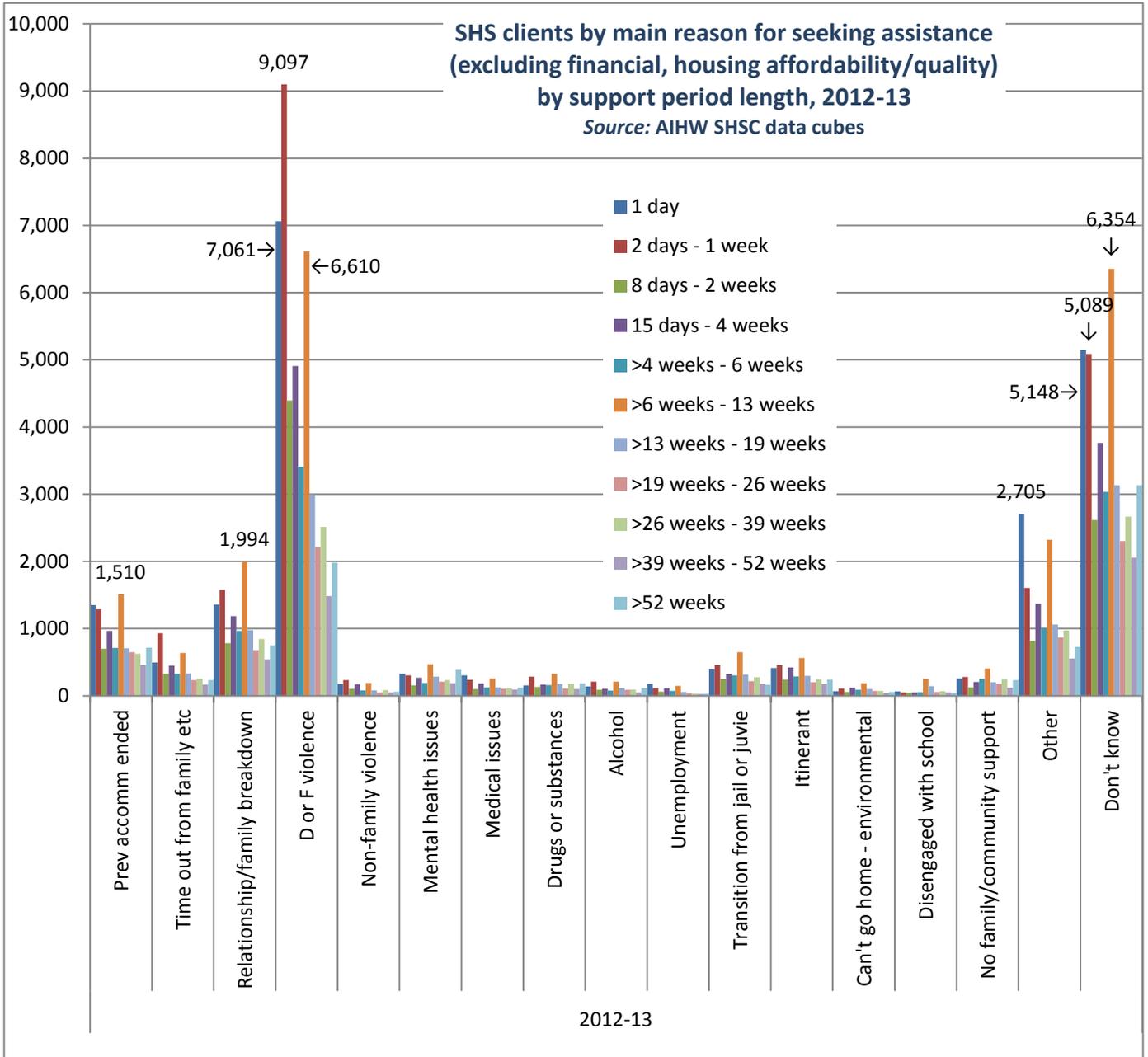
Clients whose main reason for seeking assistance is financial difficulties are typically assisted for short periods of 1-2 days, although several hundred more were assisted for more than six weeks in 2012-13 than in 2011-12 (Figure E). Those who sought assistance for reasons associated with housing affordability were more likely to be assisted for longer, with the numbers with support periods between 6 and 13 weeks rising in 2012-13. More people assisted for reasons associated with 'inadequate or inappropriate dwelling conditions' were supported for 6-13 weeks than for 1 day, with their numbers also rising in 2012-13.

Figure F:



Among clients who sought assistance for an ‘other’ main reason in 2012-13, the pattern of support period length was similar, but for all other main reasons and ‘don’t know’, the pattern was more mixed and longer support periods were more common. (Figure G)

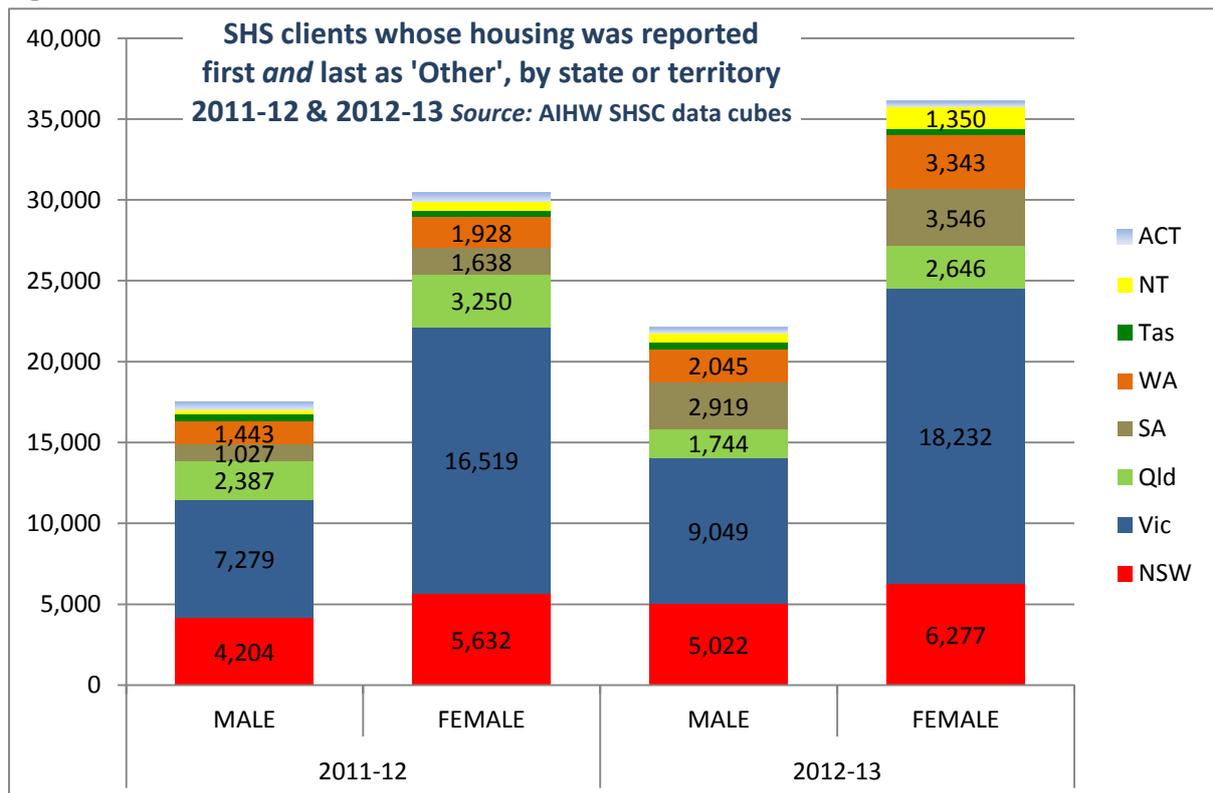
Figure G:



The number of clients reported to be in ‘other’ housing both before and after support also increased. In 2012-13, there was a large increase in the numbers of SHS clients whose housing situation was only ever reported as ‘Other’.

Figure H shows, the number of clients whose housing situations was recorded as 'Other' at both ends of support increased by more than 10,000. This was the case even though overall numbers of clients whose housing situation was first recorded as 'Other' dropped (from 91,680 to 81,377). Most of the increase in clients whose housing situation before and after assistance was not captured occurred in Victoria. However, there were also noticeable increases in NSW, SA, WA and the NT. Queensland and the ACT were the only jurisdictions to not exhibit this trend.

Figure H:



The answer 'Housing – Other' results mainly from services recording clients' dwelling type, tenure and occupancy status as 'Other'.

Most clients whose housing status was recorded as 'other' were classified by services as neither homeless nor at risk of homelessness, although in both 2011-12 and 2012-13 more than 10,000 were classified as 'at risk'. AIHW's data cubes do not allow analysis of support period lengths for these clients. However, Figure I shows comparatively few of these clients experienced long periods of homelessness.

Figure I:



This data appears to be consistent with relatively short support periods for most clients whose housing situation was only ever reported as 'other'. If that is the case, three possible explanations, or a combination thereof, suggest themselves for this phenomenon.

The first is the use of system entry points, at which clients are given limited support. There may be a 'gateway' effect (in SA as well as Victoria) of clients' housing situation not being recorded at those points.

Secondly, as indicated above, the pressure placed on SHSs by increased numbers of clients seeking assistance for financial, housing affordability/quality reasons, in the context of the greater priority that must be put on *meeting all clients' needs* and particularly those of more vulnerable people, limits the time available to complete data for everyone. The data that doesn't get recorded includes that relating to the housing situation of people whom services *can't* assist because there's nowhere to put them.

This hypothesis derives some support from housing affordability data for different jurisdictions: according to the Standing Committee on the Review of Government Services' *Report on Government Services 2014*, Tasmania was the only jurisdiction in which house purchase affordability for low- and moderate-income earners improved during 2011-12 (the latest year for which figures have been published), although affordability also declined much

less in Queensland than it did in the jurisdictions reporting increased numbers of SHS clients living in 'Housing – Other'.¹³⁵

Thirdly, Queensland and the ACT are among jurisdictions that require their service providers to report against SHSC data items, and in Queensland this information is collected from agency 'SHIP' data. Measuring agency performance (eg 'housing outcomes') under state funding contracts against the national data set is likely to improve data reporting rates, at least where this is humanly possible (as it may be in a jurisdiction that remains more affordable than most others).

Improving sector 'ownership' of the SHSC

The SHSC data quality problems in Victoria (and possibly SA) may be jurisdiction-specific and require jurisdiction-specific answers.¹³⁶ In HA's view, other limitations on SHSC data quality could be alleviated by:

- wherever possible, reducing the unnecessary pressure placed on SHSs by clients whose main reasons for seeking assistance are financial or associated with poor housing affordability or quality by addressing housing affordability outside of the homelessness system;
- providing additional 'SHIP' training and related workforce development opportunities (eg presentations of aggregated data) that focus the attention of 'frontline' workers in particular on *the benefits of accurate data collection for the sector and the people whom SHSs support*, not just for governments; and
- explicitly funding SHSs to perform quality data entry regarding their service delivery and clients.

As to the second point, the present AIHW hotline is a very useful resource, but it cannot reach people who don't know that they are answering questions incorrectly or don't have time to think about their answers because addressing (other) clients' needs is more urgent. HA understands that, while AIHW is interested in training more 'frontline' workers, their access to 'SHIP' training depends on the states and territories. SHS workers' opportunities to think and talk about the jurisdictional or national implications of what they record in 'SHIP' are also limited, yet those occasions can often provide some of the most valuable insights

¹³⁵ ROGS 2014 Table GA.9.

¹³⁶ Note: AIHW is working with the general Victorian state homelessness peak body on this issue.

into how 'frontline' work contributes to an accurate picture of client need and the services required to meet it.

It may also be desirable to match information from the SHSC with individual data from other relevant collections where they relate to the same individuals, consent can be negotiated, individuals' privacy is protected, and the results justify any additional investment of time and effort.

For example, it is known from AIHW's National Housing Assistance Data Repository (NHADR) that large proportions of people with 'high needs' who received newly-allocated public housing in 2011-12 managed to sustain that housing 12 months later.¹³⁷ In order to understand how that result was achieved and the conditions under which it might be replicated, it would be useful to know what proportion of those tenants relied on SHS tenancy support or other services to sustain their housing, what assistance they received and the duration and frequency of that assistance.

¹³⁷ [Housing Assistance in Australia 2014](#), Table 6.2.

Recommendations on data collection, collation and analysis

Recommendation 11:

That governments accept the importance of:

- *regular 'SHIP' training for SHS staff that emphasises the importance of the SHSC data set for the sector and its clients (eg as a vehicle for illustrating need, demonstrating where service delivery is effective and identifying gaps to be filled or possible areas of resource reallocation); and*
- allocating additional resources to ensure that agencies that would otherwise find it difficult to participate in 'SHIP' can do so.

Recommendation 12:

That consideration be given to altering SHSC questions to take account of the fact that service system entry points may provide different services from other homelessness agencies.

Recommendation 13:

That consideration be given to matching SHSC data with that from other collections (eg NDRAHA) in order to ascertain how homelessness service delivery intersects with other services to achieve outcomes such as sustainment of social housing tenure.

Finally, improving the quality of SHSC data may be an appropriate outcome to which state 'reward' payments could be attached, particularly if a mechanism can be devised for distributing some of the rewards to the agencies that labour to collect the (best) data and states and territories can be persuaded to align their performance and reporting requirements to those of the SHSC.

Appendices

Appendix A:

Results-based accountability architecture in the Inter-governmental Agreement on Federal Financial Relations

The Intergovernmental Agreement on Federal Financial Relations (IGAFFR) envisages

- **National Agreements** ‘defining the objectives, outcomes, outputs and performance indicators... that will guide the Commonwealth and the States and Territories in the delivery of services across a particular sector’; and
- **National Partnership Agreements** ‘defining the objectives, outputs and performance benchmarks related to the delivery of specified projects, to facilitate reforms or to reward those jurisdictions that deliver on national reforms or achieve service delivery improvements’.¹³⁸

The IGAFFR defines

- **Objectives:** ‘mutually-agreed, overarching aspirations’;
- **Outcomes:** ‘the impact a government activity is expected to have on community well-being. Outcomes should be strategic, high level and observable goals expressed in clear, measurable and achievable terms’;
- **Outputs:** ‘the services being delivered by governments to achieve outcomes’ or ‘a proxy for outcomes where outcomes are not readily observable’. Again, these should be ‘high level’ to maximise state and territory flexibility;
- **Performance indicators:** ‘data which informs the community about how governments are progressing towards achieving the objectives, outcomes and outputs’;
- **Performance benchmark:** ‘A quantifiable change in a performance indicator, usually expressed in respect of a period of time – for example, an X per cent increase in [Y] by 20[ZZ]... Performance benchmarks should be few in number, high-level and reflect the highest order, most challenging goals toward attainment of outcomes’.¹³⁹

An IGAFFR objective is ‘enhanced public accountability through simpler, standardised and more transparent performance reporting by all jurisdictions, with a focus on the achievement of outcomes, efficient service delivery and timely public reporting;’ (cl 5).

Clause 8 recites that ‘The intent of the parties is... to improve the well-being of all Australians through improvements in the quality, efficiency and effectiveness of government service delivery by:... enhancing accountability to the public for the outcomes achieved or outputs delivered under National Agreements or National Partnerships’.

Clauses 14-17 of the IGAFFR state:

As improved accountability is a key objective to the framework for federal financial relations, the Parties commit to improve service delivery by ensuring that the appropriate government is accountable to its

¹³⁸ Schedule A, ‘Institutional Arrangements’.

¹³⁹ Ibid.

community — not just for its expenditure in delivering services, but more importantly for the quality and efficiency of the services it delivers and the outcomes it achieves.

The Parties commit to enhancing the accountability of governments to the community through simpler, standardised and more transparent public performance reporting for all jurisdictions, underpinned by clearer roles and responsibilities.

The Parties are committed to on-going performance reporting and to working together to improve performance reporting for the sake of enhanced public accountability.

The performance reporting framework will focus on the achievement of results, value for money and timely provision of publicly available performance information.

Clause 18 relates to reporting by the former CRC and by the Productivity Commission.

Schedule C, 'Public Accountability and Performance Reporting'

Schedule C of the IGAFRR on 'Public accountability and performance reporting' asserts that '[t]he accountability of governments to the public will be enhanced through simpler, standardised and more transparent public performance reporting for all jurisdictions'¹⁴⁰ that uses a 'single, integrated national reporting system'. Clause 2 of this Schedule states that:

'...[T]he community needs to know which level of government is accountable for the delivery of a particular service, and whether that government's policies and programs are:

- (a) effective in contributing to the desired outcomes;
- (b) being implemented efficiently; and
- (c) reaching those people for whom they are intended.

Clauses 5 and 9 give the role of collating performance data to the Steering Committee for the Review of Government Service Provision. Clause 13 states that '[p]erformance reporting should assist the public in assessing governments' progress against agreed objectives, outcomes and outputs'.

Clauses 6-8 set out what is required of performance indicators:

The purpose of the performance indicators is to inform the general public about government performance in making progress towards identified outcomes. Performance indicators will provide a clear picture of the achievement of governments in delivering services.

Accordingly, the Parties will ensure that performance indicators will be meaningful, simple and comprehensible to members of the public, that there is underlying data to support the indicators, that the indicators meaningfully measure what they purport to measure and are reliable.

The effectiveness of the reporting framework also depends on the quality of the data underpinning each indicator. The Parties agree that the underlying performance data should have the following characteristics:

¹⁴⁰ Clause 1.

- meaningful — to improve public accountability, data must be reported in a way that is meaningful to a broad audience, many of whom will not have technical or statistical expertise, and validly measures what it claims to measure;
- understandable — the data will be accessible, clear and unambiguous so that the community can come to its own judgements on the performance of governments in delivering services;
- timely — to be relevant and enhance accountability, the data published will be the most recent possible — incremental reporting when data becomes available, and then updating all relevant data over recent years, is preferable to waiting until all data are available;
- comparable — data must be comparable across jurisdictions and over time — where there are no comparable data for a particular performance indicator, the Parties will work together with assistance from technical experts to develop common definitions, counting rules and measurement standards so that data can be provided on a comparable basis;
- administratively simple and cost effective — the costs involved in collecting data will be proportionate to the benefits to be gained from the resulting information;
- accurate — data published will be of sufficient accuracy so that the community has confidence in the information on which to draw their analysis; and
- hierarchical — high-level performance indicators should be underpinned by lower level (more detailed but consistent) performance data where a greater level of sector specific detail is required for other purposes.

In Clause 25, Governments also agreed to keep reporting requirements and processes under review and

In reviewing reporting requirements and existing processes, consideration will be given to:

- identifying and addressing data gaps that prevent reporting on important performance indicators;
- identifying strategies for improving timeliness of data collection; and
- rationalising data collection processes where there is overlap and duplication.

In Clause 26, Governments agreed to improve state and territory data collection processes:

Consistent with the move to a single, integrated, national reporting system, the Parties agree to improve national and state and territory data collection processes, including the development of:

- standard data definitions;
- standard data reporting benchmarks; and
- a program of performance indicator improvement where existing measures do not adequately provide the public with a comprehensive and meaningful set of performance measures.

Appendix 2

CHSA Excerpts

The *Commonwealth-State Housing Agreement 2003* (CHSA 2003) was highly prescriptive when it came to state financial contributions and reporting requirements. States were obliged to contribute just under 50 per cent of the Commonwealth 'Base Funding' provided to that state, not counting housing assets funded by previous agreements or proceeds of the sale thereof (cl 4(17)), and to make this spending publicly transparent:

The State contribution shall be by way of interest free, non-repayable Grants and shall be separately identified in State Budget documents or otherwise identified as agreed between the Minister and State Minister. (cl 4(16))

The CHSA also imposed a sanction on a State's failure to provide its full financial contribution:

Commonwealth Base Funding to the State could be reduced by an equivalent amount and the balance allocated to another state (cl 4(12));

And enforced state obligations to report their expected and actual, cash and accrual, financial contributions along with the proceeds of sales of any housing stock funded under this or previous CSHAs, by making

five per cent of each Grant Year's Base Funding... contingent upon States' meeting [those] requirements...' (cl 4(3)).

Interestingly, the latter sanction also applied to states' obligations to enter bilateral arrangements designed to increase outside investment in social housing and reduce workforce disincentives for social housing tenants.

Appendix 3:

NPAH excerpts

Cl 20 of the NPAH provides:

Client outcomes will be reported using data from the Specialist Homelessness Services Collection (SHSC) held by the Australian Institute of Health and Welfare (AIHW), with DSS responsible for confirming participation in the SHSC. All funded initiatives and services that are in-scope for the SHSC must participate in the SHSC unless an exemption is provided by the Commonwealth. Exemptions will be negotiated between the Commonwealth and States in legitimate circumstances where data would not be required.

- (a) If through the existing reporting provided by AIHW under the SHSC, it is found a service funded under the Agreement is not participating in the SHSC and has not been granted an exemption, the States, together with the Commonwealth, will work towards rectifying any issues preventing this service from participating in the SHSC. If issues are not resolved following an opportunity for review, the Commonwealth funding contribution to the State for this service may be suspended.

[There is no sub-clause 20(b).]

SHSC exemptions were to have been negotiated by 1 July 2014.

Clause 26 refers to the possibility of state funding being reduced where states do not put up adequate 'matching' funding, and adds:

... Funding levels will also be dependent on services that are in-scope for the SHSC participating in the SHSC or receiving an exemption. Where a service does not participate and an exemption has not been provided, the Commonwealth funding to the State for that service will be suspended if the issue has not been rectified as detailed under clause... 20...

cl 27 of the NPAH:

The Commonwealth is committed to ensuring [that] there is transparency and accountability in how States match the Commonwealth contribution, including maintenance of overall homelessness service delivery expenditure across the portfolio. Any reduction in overall homelessness service delivery expenditure will be identified through Table 18A.2 from the January 2015 and 2016 ROGS reports and may inform future homelessness arrangements.

Appendix 4:

Past Commonwealth funding of social housing

Commonwealth Funding for the CSHA: (1989) 1994–95 to 2000–01¹⁴¹

The 1989 CSHA

1994–95	Untied Grants	Pensioner Rental Housing Program	Aboriginal Rental Housing Program	Mortgage and Rent Assistance Program	Crisis Accommodation Program	Community Housing Program	Total
(\$'000)							
NSW	267 845	18 960	20 597	10 495	18 261	21 253	357 411
VIC	199 978	11 432	3 638	7 785	9 987	19 335	252 155
QLD	133 783	9 518	30 313	5 498	8 946	12 085	200 143
WA	70 301	4 093	15 862	5 192	467	5 353	101 268
SA	53 592	3 852	9 224	2555	3 236	4 751	77 210
TAS	19 244	912	-	822	-	1 857	22 835
ACT	18 218	523	-	522	890	1 749	21 902
NT	13 518	523	19 247	297	398	358	34 341
TOTAL	776 479	49 813	98 881	33 166	42 185	66 741	1 067 265
1995–96							

¹⁴¹ The following is extracted from McIntosh and Phillips, [The Commonwealth-State Housing Agreement](#), Australian Parliamentary Library e-brief, 2001.

NSW	257 356	18 520	17 777	10 481	14 803	24 257	343 194
VIC	185 812	10 882	3 638	7 734	9 921	18 843	236 830
QLD	137 217	9 791	30 405	5 574	7 150	13 540	203 677
WA	70 714	4 153	15 862	2 956	7 096	7 119	107 900
SA	50 508	3 945	8 342	2 537	4 554	6 158	76 044
TAS	29 617	1 429	1 392	815	2 164	2 258	37 675
ACT	18 182	523	-	520	753	1 161	21 139
NT	13 510	523	19 669	297	476	1 016	35 491
TOTAL	762 916	49 766	97 085	30 914	46 917	74 352	1 061 950

The 1996 CSHA

1996–97	Base Funding (1) (Net of SFCs)	Aboriginal Rental Housing Program	Crisis Accom Program	Community Housing Program	Total	State Fiscal Contribution (Actual)
(\$'000)						
NSW	290 663	17 777	13 432	21 675	343 547	0
VIC	213 536	3 638	9 868	15 924	242 966	0
QLD (2)	43 249	25 227	7 238	11 679	87 393	113 368
WA	82 498	15 862	3 812	6 152	108 324	0

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SA	51 696	8 342	3 221	5 197	68 456	18 000
TAS	26 235	696	1 033	1 667	29 631	0
ACT	9 137	0	665	1 074	10 876	10 366
NT	14 370	19 458	386	622	34 836	0
TOTAL	731 384	91 000	39 655	63 990	926 029	141 734
1997–98						
NSW	259 265	17 777	13 433	21 676	312 151	0
VIC	190 333	3 638	9 861	15 913	219 745	0
QLD (3)	22 321	25 227	7 263	11 720	66 531	117 857
WA	74 058	15 862	3 837	6 192	99 949	0
SA	41 351	8 342	3 178	5 129	58 000	20 000
TAS	23 628	696	1 021	1 647	26 992	0
ACT	12 615	0	664	1 071	14 350	5 308
NT	7 167	19 458	398	642	27 665	6 500
TOTAL	630 738	91 000	39 655	63 990	825 383	149 665

1998–99						
NSW	256 461	17 777	13 425	21 663	309 326	0
VIC	188 181	3 638	9 850	15 896	217 565	0
QLD (4)	84 094	25 227	7 303	11 784	128 408	55 412
WA	73 653	15 862	3 855	6 221	99 591	0
SA	55 306	8 342	3 157	5 094	71 899	5 000
TAS	23 171	696	1 004	1 621	26 492	0
ACT	12 295	0	658	1 061	14 014	5 400
NT	10 621	19 458	403	650	31 132	3 043
TOTAL	703 782	91 000	39 655	63 990	898 427	68 855

Notes:

(1) Commonwealth allocations were reduced for 1996–97 to 1998–99 as some States chose to use CSHA funds to offset their State Fiscal Contribution (SFC) liabilities to the Commonwealth Government's debt reduction program, which was agreed at the 1996 Premiers' Conference.

(2) QLD 1996–97 SFC payment is comprised of reductions to several portfolios but payment was made from CSHA grants for administrative simplicity. Queensland agreed to transfer approximately \$84m from other State sources for CSHA purposes.

(3) QLD 1997–98 SFC payment is comprised of reductions to several portfolios but payment was made from SHA grants for administrative simplicity. Queensland agreed to transfer approximately \$89m from other State sources for CSHA purposes.

(4) QLD 1998–99 SFC payment is comprised of reductions to several portfolios. QLD agreed to transfer approximately \$40m from other State sources for CSHA purposes.

The 1999 CSHA

1999 – 2000	Base Funding	GST Compensa tion	Aboriginal Rental Housing Program	Crisis Accom Progra m	Community Housing Program	Total Commonwealth
(\$'000)						
NSW	253 020	-	17 777	13 417	21 651	305 865
VIC	185 864	-	3 638	9 856	15 905	215 263
QLD	138 124	-	25 227	7 325	11 819	182 495
WA	73 232	-	15 862	3 884	6 267	99 245
SA	59 068	-	8 342	3 132	5 054	75 596
TAS	22 705	-	696	990	1 598	25 989
ACT	17 394	-	0	649	1 047	19 090
NT	13 557	-	19 458	402	649	34 066
TOTAL	762 964	-	91 000	39 655	63 990	957 609
2000– 01						

NSW	249 635	23 000	17 777	13 410	21 640	325 462
VIC	183 463	15 000	3 638	9 856	15 904	227 861
QLD	136 954	19 850	25 227	7 357	11 872	201 260
WA	72 505	8 533	15 862	3 895	6 285	107 080
SA	57 878	9 517	8 342	3 109	5 017	83 863
TAS	22 260	2 617	696	977	1 576	28 126
ACT	17 208	5 900	0	647	1 044	24 799
NT	13 485	5 250	19 458	404	652	39 249
TOTAL	753 388	89 667	91 000	39 655	63 990	1 037 700

NB: The 2000–2001 table shows projected expenditure as at 28 February 2001.

Source: Answer to Senate Estimates Question on Notice No. 46(a) asked by Senator Evans on 20 February 2001. Senate Community Affairs Legislation Committee, Additional Information Received, Family and Community Services Portfolio, Volume 1, May 2001, pp. 117–119.

Commonwealth funding for the CSHA has been reduced in real terms over the period covered in the Table. During the course of the 1996 CSHA some State/Territory jurisdictions (Queensland, South Australia and the two Territories) did not take up their full Commonwealth CSHA allocations so as to offset their State Fiscal Contributions—see Notes for more details. If future projections of Commonwealth funding are accurate this reduction in support is likely to continue into the future. For example, projected Commonwealth outlays for the CSHA are \$1028m in 2001–02, \$1019m in 2002–03, \$920m in 2003–04 and \$911m in 2004–05. (Answer to Senate Estimates Question on Notice No 46 (b): Senate Community Affairs Legislation Committee, Additional Information Received, Family and Community Services Portfolio, Volume 1, May 2001, p. 120.)

As mentioned earlier however, it should be noted that as funding for the CSHA has been declining, Commonwealth funding for Rent Assistance has been increasing, for example, outlays on Rent Assistance have risen from \$1.45 billion in 1994–95 to \$1.7 billion in 2000–01 (Department of Family and Community Services, Annual Report 2000–01, p. 111). This is in line with the recent trend towards relying more on the private rental market to provide housing for those in need.

The increased expenditure on RA over the past 10 to 15 years has been driven by both increases in the amount of individual RA provided and expanded access in terms of those eligible for RA. The major changes to RA affecting access to the assistance have been:

- July 1987 – the separate income test for RA was abolished and RA was paid as a component of the income test rate of income support payable. This considerably expanded access to RA to part-rate income support recipients.
- December 1987 – For the first time RA was paid to families with children paid as a part of the Family Allowance Supplement. Previously RA was only payable attached to an income support pension/allowance. This considerably expanded access to RA.
- June 1989 - \$5 a week was added to the RA for families with children. Rent threshold above which RA was payable was raised to \$20 per week.
- June 1990 – higher RA rate paid to families with 3 or more children.
- March 1991 – Twice yearly CPI indexation of the RA rate was introduced.
- March 1993 – Universal RA rent threshold varied for families with greater numbers of children and the withdrawal rate up to the maximum rate eased to 17 cents in the dollar.
- March 1994 – abolition of RA waiting periods for allowance recipients.
- March 1996 – maximum RA rate was increased by \$5 per fortnight for families with children.
- July 2000 – the maximum rate of RA was increased by 4 per cent as part of the compensation for the GST.

Appendix 5:

Report on Government Service (RoGS) data

Table GA.9 'Supplementary contextual data'

	<i>Unit</i>	<i>NSW</i>	<i>Vic</i>	<i>Qld</i>	<i>WA</i>	<i>SA</i>	<i>Tas</i>	<i>ACT</i>	<i>NT</i>	<i>Aust</i>
Housing affordability										
Number of homes sold or built per 1000 low and moderate income households that are affordable by low and moderate income households										
2011-12	Rate	31.5	28.0	20.4	23.2	27.8	37.5	37.1	36.5	27.5
2009-10	Rate	41.8	41.1	21.1	29.7	29.3	35.9	50.6	71.0	35.5

ROGS 2014 Table GA.9 does not break down the number of homes sold by capital city and balance of state/territory as past CRC reports have done. The decline in purchase affordability is likely to have been more pronounced in the capitals, notably Sydney, in 2011-12, than in rural areas. There is nothing to suggest that this trend had begun to reverse in 2012-13. *ROGS 2014* Table GA.9 also does not distinguish between houses that were affordable to low income earners and those that were affordable to moderate income earners as past CRC reports have done.¹⁴² It is likely that the 31.5 houses per 1000 low-income households in NSW that rated as 'affordable' on indicator 2 in 2011-12 were affordable only to households on *moderate* incomes.

¹⁴² Although the SCRGSP plans to publish this breakdown in late 2014.

Appendix 6

Aims of the Research

The purpose of the paper is to suggest ways in which DSS might better measure the effectiveness of its housing and homelessness spending. Since the present measures of the effectiveness of that spending are contained in COAG's NAHA and NPAH, the paper is structured around those instruments, although it also makes other recommendations.

Methodology

The research design was based on the research questions and involved a combination of data collection methods including:

- A review of relevant Commonwealth, State and Territory governments' policy documents
- A review of research literature
- Interviews with eighteen staff in front line delivery and use of the SHIP (Specialist Homelessness Information Platform) data system. These staff came from a range of small to large services, in DV, youth homelessness and general homelessness services.
- Interviews with seven relevant state and federal peak bodies
- Consultation with state government representatives
- Consultation with Board members of Homelessness Australia
- Consultation with Homelessness Australia's Councils' (CHPA, NYCH and WESNET) members
- Consultation with AIHW staff
- Data analysis

Interviews

A qualitative research approach, with semi-structured in-depth interviews, was used. This enabled a flexible approach and for each respondent to reflect upon and express their views. It also enabled the elicitation of more sensitive information.

The researcher used open-ended questions, regarded as the most effective method to gather an "authentic" understanding of people's experiences, which enabled the interviewees a wide choice of possible answers so a wide range of options could be uncovered. The questions were arranged in stem-plus-query design to allow the interviewees to start to focus on the topic. Closed questions were used to explain facts. During the interviews, the researcher used a combination of open and closed questions in a funnel sequence.

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The researcher commenced the interview as an unstructured interview and then concentrated on managing the process. When information appeared to be drying-up the researcher used pre-planned questions based on defined, pre-identified topics to unearth deeper information.

The interviews were conducted via telephone so the researcher could adapt the questions, clarify doubt and ensure the responses were properly understood.

Selection and profile of the participants

The researcher used non-probability sampling, which relies on the personal judgment of the researcher, rather than on chance, to select the sample set. Non-probability sampling will yield good estimates of the population characteristics. However, the outcomes are not statistically projectable onto the population. The researcher's judgment was used to select the sample set. The researcher believes the sample set is representative of the population of interest.

Homelessness Australia has about 350 member organisations. Membership comprises of large and small front-line homelessness and domestic violence services. Some are stand-alone while others are part of over arching national organisations. National housing and state/territory peak bodies are also part of Homelessness Australia's membership.

To elicit comprehensive data the researcher used the following criteria to select the respondents:

- The respondent was to hold a position in the organisation that was relevant to the research question,
- The respondent was to have been engaged with input into the information measuring system for at least 12 months; or in the case of peak bodies, engaged with the reviewing of information for at least 2 years.
- The person was to be an employee of a Homelessness Australia member organisation.

The researcher also sought to have representation from different areas within the homelessness sector. The resultant sample set was:

- Homelessness services (general) – 8 interviewees
- Youth homelessness services – 4 interviewees
- Domestic violence services – 6 interviewees
- Peak bodies (state and national) – 7 interviewees.

The sample set, from a mix of urban, rural and remote locations, represented the following states/territories:

- Queensland – 4
- NSW- 3
- Act – 3
- Victoria – 4
- Tasmania – 1
- Northern Territory – 1
- South Australia – 2
- Western Australia – 2
- National – 5.

This researcher believes that a sample of twenty-five respondents from its member organisations would be sufficient to gain an understanding of the research question. The selected interviewees were of a very high calibre and as such offered great insight into this area.

Reliability/validity statement

The validity ranking, whether it measures the desired property accurately, of this research is estimated to be medium-high. This ranking was assigned because:

- the interview topics were situational and job-related questions,
- the interviews were semi structured,
- for consistency, the one researcher carried out all interviews,
- the respondents were chosen for their excellent job performance skills (not tenure),
- the researcher recorded the interviews to enable accuracy, and
- the interviewer is experienced and has had training in the interviewing process.

The reliability, or consistency of research to enable the results to be replicated, of this research is also rated at medium-high. As the structured nature of an interview decreases, so too does its reliability. As the interviews in this research are semi-structured interview the reliability, would be rated at medium. However, as the interviewees were experts, and could give insightful and considered responses, this rating can be elevated to medium- high. Consistency of analysis, using just one researcher, supports this higher rating.

Ethics

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The ethical procedures for this research were based on *The National Statement on Ethical Conduct in Human Research (2007)*.

Limitations

This was a qualitative piece of work based on interviews with a relatively small sample set. Because of this there are some limitations to this study:

- The interviewees were selected by the interviewer, this may have influence the research results
- While the project sought to include representation from all states/territories, an imbalance of respondents may have skew the outcomes
- While the project sought representation from all homelessness service areas, an imbalance of respondents may have skew the outcomes
- While the interviewer was skilled and knowledgeable, the interviews may have been influenced by interviewer bias
- No data was collected for remote areas.