

Scope

This policy outlines the allocation and offer requirements for general and supported housing managed by Pacific Link Housing Limited (PLH). For affordable housing eligibility, please refer to the Affordable Housing policy.

Purpose

The policy is intended to:

- ensure equitable access to eligible people seeking housing.
- maintain a fair, needs-based assessment process and non-judgemental attitude to all applicants.
- ensure individuals' rights are not discriminated against on the grounds of ethnicity, gender, marital status, criminal history, physical and/or intellectual disability or sexual preference according to anti-discrimination legislation.
- provide an open and transparent allocations process.
- maintain confidentiality of applicants' and tenants' information in accordance with privacy legislation.
- ensure that PLH can work closely with support services to have a holistic approach when addressing issues related to applicants.
- meet the requirements of funding bodies for eligibility for community housing and other housing programs, and
- maximise utilisation of scarce housing resources, optimise rental income for viability and operate efficiently to keep vacancy periods as short as possible.

Housing Allocations

General housing will be allocated to eligible people from the NSW Housing Register in accordance with Housing Pathways policies. The Register includes new applicants for social housing and tenants who have been approved for transfer from both FACS Housing and participating social housing providers. PLH will prioritise PLH tenant transfers over transfers from other housing providers in the same category.

The Register lists applicants in order according to their required housing location, their approval category and approval date. Approval categories are either High Priority, Priority or Wait-turn. Details of the definitions and evidence requirements are specified in the FACS Social Housing Eligibility and Allocations Policy Supplement at the link below:

<https://www.facs.nsw.gov.au/housing/policies/social-housing-eligibility-allocations-policy-supplement#iel>

To maintain fairness between applicants, and to ensure Wait-turn applicants are not regularly overlooked, PLH will generally allocate available housing as follows:

- One-third High Priority category 1, 2 and 3
- One-third Priority category 4 and 5
- One-third Wait-turn category 6.

Generally, allocations will be made according to this rotation of categories and the suitability of the property available, except that precedence may be given to applicants nominated by support partner agencies that are granted nomination rights for clients requiring support services. On occasion PLH may need to make a non-standard selection.

Non-standard selections

In some circumstances, PLH may make non-standard selections when allocating properties. A non-standard selection is when an applicant is selected from the NSW Housing Register that may not have the highest priority. Non-standard selections may be made in the following situations:

- To meet the needs of an applicant who is at serious risk or in imminent danger. The applicant's circumstances must be substantiated and fully documented.
- For an urgent transfer approved for escalation, including tenants being relocated for management purposes.
- For an applicant with specific needs. For example, if specific location or property modifications are required.
- To meet internal or contracted strategic objectives.

Non-standard selections must be approved by the Manager, Housing and Maintenance Services or higher.

Local Allocation Strategies

In some instances PLH may determine a local strategy for allocations in a particular area, housing complex or estate. These strategies provide flexibility to consider a local community's needs and may be implemented for vacancies when there is:

- a high concentration of community and/or public housing stock
- a high concentration of tenants with multiple health, social or economic issues
- existing tenancy management issues or there is a potential for them to develop
- existing issues which will be exacerbated if allocations are not sensitively handled, or
- a mismatch of supply and demand making the property hard to let.

Specifically, PLH adopts Local Allocation Strategies as follows :

1. Private Leasehold Properties

To meet the high demand for social housing in our area, PLH leases properties from private landlords in addition to properties leased from the government. A separate allocation strategy applies with the following objectives:

- to minimise risk to the company associated with cost of malicious damage, anti-social behaviour and poor property care.
- to promote a more sustainable property management portfolio by not allocating all properties to High Priority clients with the associated high complex needs.
- to minimise reputational risk to the company.
- to retain positive relationships with real estate agents, investors and developers.

PLH will apply the following additional eligibility criteria prior to making an offer for private leasehold properties:

- clients must be existing social housing tenants who are listed for a transfer (either by FACS Housing or another community housing provider),
- satisfactory references are obtained from the tenants' existing housing provider in relation to conduct of their tenancy, including history of property care or damage, behaviour and payment history.

2. Dunbar Way Estate, North Gosford

Where properties become available at the Dunbar Way Estate, North Gosford, allocations to clients may vary from the general PLH policy outlined above. Consideration will be given to maintaining the overall tenancy mix in the Estate between elderly, family and supported clients

and successfully completed transitional supported tenancies that may be considered as permanently housed.

3. Multi-tenancy Apartment Complexes

For multi-tenancy apartment complexes owned or managed by PLH including Chambers Place, Woy Woy and Copnor Avenue, The Entrance, sensitive allocation strategies will be considered for each unit. These will take into account:

- factors such as age, physical capabilities, extent of social interaction, resilience and the extent of family or other supports in place
- tenant vulnerabilities such as physical ailments, disabilities or restrictions
- successfully completed transitional supported tenancies that may be considered as permanently housed.

Matching Clients and Property Policy

The decisions for matching of applicants with a vacant property will be based on:

1. matching high needs applicants to preferred locations
2. the property size, facilities and tenant mix
3. applicant needs and preferences as per their application form and interview
4. family composition
5. providing access to support services
6. making best use of available stock by matching people to properties, and
7. encouraging a successful and sustainable tenancy.

When a property becomes available, either at the time of notice given by a tenant or when a property has been identified as abandoned, the PLH Housing Manager will search the Housing Register to generate suitable applicant shortlists. The Housing Manager will confirm that the applicant information is up-to-date and document the rationale for selection of applicants based on prioritisation of needs and assessment criteria on an Allocation Form. The PLH Housing Manager must document the reasons for not selecting persons with higher priority on the list eg pets that cannot be accommodated. Once completed, the Allocation Form must be signed by three people - the allocating Housing Manager, Pathways Coordinator and Manager, Housing & Maintenance Services (or delegate). The Housing Manager will then proceed to offer the property to the applicants on the Allocation Form in accordance with the Offers Policy outlined below.

Properties with Specific Features or Designated Purpose

Properties with specific features will only be allocated to applicants that are able to show a demonstrated need, unless these properties are readily available or are vacant for a prolonged period. Examples of properties with specific features may include:

- **Modified properties** - Properties which have been modified to cater for people with a disability will only be allocated to applicants/households with a demonstrated need for these features. The applicant or their household member must have documentation from a medical professional or allied health care worker that supports their need for a property with specific features.
- **Ground floor properties** - Ground floor or properties with level access will be allocated to an applicants/household with a demonstrated need for these features. The applicant/household member must have documentation from a medical

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practitioner which supports their requirement for a ground floor or level access property. Ground floor properties will also be targeted to seniors where appropriate, to support seniors by allowing them to age in their current home.

- **Properties with a designated purpose** – Properties will only be allocated to applicants that meet the program or planning criteria. Properties with a designated purpose include: Properties subject to State Environmental Planning Policy (Housing for seniors or people with a disability) 2004. The following applicants are eligible for properties which are subject to the above policy:
 - Seniors (people who are aged 55 years or more or 45 years or more for Aboriginal and Torres Straight Islanders) or people who have a disability.
 - People who live in the same household with seniors or people who have a disability.
 - Staff employed to assist in the administration of and provision of services to housing provided under this policy.

Bedroom Entitlements

The tables below outline the standard bedroom entitlements by FACS for social housing and any changes to those bedroom types due to the need to accommodate children.

| Household type | Standard bedroom entitlement |
|--|---|
| Single people | Studio, one or two bedrooms |
| Couples | One or two bedrooms |
| Single people or couples with one other household member | Two or three bedrooms |
| Single people or couples with two other household members | Two or three bedrooms |
| Single people or couples with three other household members | Three or four bedrooms |
| Single people or couples with four other household members | Three or four bedrooms |
| Single people or couples with five or more other household members | Four bedroom or, if available, five or more bedrooms. Clients who have a five bedroom household complement will generally be offered a four bedroom property unless a five bedroom property is vacant when the client's turn is reached. This is because of the limited availability of five bedroom accommodation. |

In recognition that one bedroom bedsit accommodation may be unavailable from time to time in the PLH service area and one bedroom unit accommodation is usually SEPP 5 development for aged and/or disabled persons and to maintain equity in allocations, 2 bedroom unit/villa stock may be allocated to single persons and couples.

Criteria for Accommodating Children

PLH will consider the age and gender of any children in the household when it determines a household's bedroom entitlement. The principles applied by PLH when it does this are set out according to FACS policy in the table below:

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| Situation | FACS Policy |
|--|---|
| Child is over 18 years of age | The person is considered to be an adult when calculating the minimum bedroom entitlement |
| Shared bedrooms | <ul style="list-style-type: none"> • Same sex children up to 18 years of age are expected to share a bedroom • Male and female children are expected to share a bedroom until one of the children reaches 10 years of age. |
| Children can't share a bedroom | <p>FACS will allocate an additional bedroom where the client has demonstrated a need for same sex children, or children under 10 years of age, to have separate bedrooms.</p> <p>Examples of situations where an extra bedroom could be appropriate include where there is a large age gap between the children or behavioural factors.</p> |
| Shared custody | The child/children are considered to be part of the household if the client has shared custody of children for 3 days per week or more. Normal bedroom entitlements apply. |
| Access visits from children | <ul style="list-style-type: none"> • The children are not considered to be part of the household if they visit for less than 3 days per week. • The children are not considered to be part of the household if they are receiving out-of-home care. An extra bedroom will be considered when evidence of proposed restoration of children is provided. • The client must demonstrate a need for an extra bedroom to accommodate access visits. |
| Future needs of children who may need separate bedrooms in 2 or 3 years time | FACS will take this into account when matching the client to a property if it can. FACS will make this decision on a case by case basis according to the size and type of housing that is available in the area. |

Offer of Housing

PLH will make up to **two** reasonable offers of housing to a new applicant or a transfer request or relocation for management purposes. An offer is reasonable if it will meet the client's known housing requirements and locational needs based on the merits of the information provided by the client.

Generally PLH will adhere to FACS policy in making offers of properties to clients and details are provided at the link below:

<https://www.facs.nsw.gov.au/housing/policies/matching-offering-property-client-policy>

In the first instance, the applicant will be contacted by telephone with the offer of a property. Should the applicant not respond PLH will send a letter to the client requesting that they contact the office urgently (before close of business on the second working day after the letter was posted).

At the time of the offer the client will be advised of the type and length of lease that PLH will offer based on an assessment of their current household circumstances. After an offer has

been made, PLH expects clients to inspect the property and inform PLH whether or not they will accept the offer within 2 working days of viewing the property. PLH can extend this timeframe for a short time if the client requests it and has good reasons for making the request.

If the property is still occupied, PLH will arrange, where possible, a time for the client to view the property with a Housing Manager. In most cases the property will need to be cleaned and major or minor maintenance will be required. Where possible the vacant property will be made ready for occupation within 7 to 14 days, unless the property needs significant maintenance or major upgrade at this time.

If the property is undergoing refurbishment, renovation or other planned maintenance, PLH will inform the client about the work that is to be carried out and the expected standard or condition of the property when the work is finished.

Offer Response Form

All clients who have been made an offer must complete, sign and return the Offer Response Form within the required time. This form is an opportunity for the client to detail in writing, their initial response to the property that they have just viewed and to provide PLH with a written record that they have viewed the offered housing.

Offer Accepted If the client accepts the offer, PLH will advise the client when the property will be ready and what needs to happen before the client can move in. PLH will usually ask the client to sign a tenancy agreement within one week¹ of accepting the offer. PLH can extend this timeframe if the client requests it and has good reasons for making the request. (refer FACS Evidence Guidelines).

Offer Rejected If the client does not accept the offer, PLH will decide whether the client's response is:

- A rejection of a reasonable offer which means the offer would count as one of the client's two offers; or
- A valid refusal of an unreasonable offer, which means the offer would be withdrawn and does not count as one of the client's two offers.

In making this decision, PLH will apply the requirements of the Matching Clients and Properties Policy. As part of this process it will ask the client to provide the reason for rejection in writing using the Offer Response Form. This information required is outlined in Evidence Guidelines and must be provided to PLH within:

- 7 days of rejecting the offer if being relocated on portfolio or tenancy management grounds
- 2 days of rejecting the offer for all other applications.

Offer Withdrawn by PLH

PLH can withdraw an offer after it has been made. PLH will withdraw an offer if:

- PLH offered the property but now needs it for a client with more urgent needs
- PLH matched the client to the property but did not provide the details to the client because the client's needs or circumstances had changed
- PLH matched the client to the property but did not provide the details to the client because they did not meet the eligibility criteria including providing satisfactory evidence of previous tenancy and payment history with PLH or another community housing provider

¹ Source: Housing Pathways Matching and Offering a Property to a Client Policy

- the client decided not to accept an offer of an over 55s property. PLH will change its records to show that the client should not be offered this type of property again, or
- the client did not accept the property and PLH has decided that the client's decision is valid because, based on information provided by the client, the property did not meet their needs. Such information may include a letter and other information provided by the client explaining their reasons for declining an offer and supplying relevant supporting documentation such as:
 - Medical Assessment Form.
 - letter from their doctor or health care provider.
 - letter from their support provider.
 - letter from their employer.

PLH will withdraw the offer and amend the Housing Pathways records so that a suitable offer can be made and reallocate the property.

Suspending an Application

PLH can temporarily suspend a client's application if the client is in a situation where they are temporarily unable to accept an offer due to circumstances beyond their control. This means that the client will retain their place on the waiting list but will not receive any offers of housing. Applications can be suspended for up to six months. If they cannot accept an offer after six months they will be withdrawn from the waiting list. The client must continue to meet social housing eligibility criteria and if the client is registered for a Transfer, Transfer eligibility criteria applies, while their application is suspended.

Circumstances when PLH will suspend applications include, but are not limited to, situations where the client:

- Is experiencing illness or hospitalisation
- Is overseas or on holiday
- Is in prison
- While support or care plan is being arranged.

Removing a Client from the Waiting List

PLH will remove a client's application from the waiting list in an offer situation for the following reasons:

- The client has rejected two reasonable offers of housing
- The client repeatedly fails to respond to our attempts to contact them to reconfirm their eligibility before making an offer of housing or to actually make an offer of housing, or
- The client accepted an offer of housing but did not sign a tenancy agreement, or
- The client did not respond in a reasonable time to PLH's phone calls or letters advising of an offer. Once the client makes contact again and demonstrates they remained eligible they will be re-instated on the waiting list or
- The client no longer meets social housing eligibility criteria
- The client does not acknowledge a debt owing to PLH from a former tenancy and does not agree to a plan to make regular repayments prior to any offer of housing and continuing until the debt has been repaid in full
- Because the client is not capable of living independently without support and no support is in place
- The client has been dishonest with information provided.

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Appeals

If a client believes PLH has made the wrong decision they should ask for a formal review of the decision. To do this a client needs to complete an appeals form stating why they disagree with the decision – refer PLH Appeals and Complaints Policy.

Craig Brennan

Craig Brennan, CEO November 2018