Southern Suburbs

Taskforce

**Empowering Communities**

Port Kembla, Kemblawarra, Warrawong, Lake Heights, Cringila, Berkeley, Coomaditchie

Housing Payment Deduction Scheme Consultation

Housing Policy Branch (MSH 3)

Department of Families, Housing, Community Services and Indigenous Affairs

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CANBERRA BUSINESS CENTRE

ACT 2610

23 May 2013

**Submission on the proposed Housing Payments Deduction Scheme**

**and the draft Social Security Legislation Amendment (Public Housing Tenants’ Support) Bill 2013 and associated instruments**

**About the Southern Suburbs Taskforce**

The Southern Suburbs Taskforce (**‘SST’**) was formed in 2003 and is a group of community services and organisations from Government and Non-government sectors in the south-eastern suburbs of the Wollongong Local Government Area who meet monthly to address local and common issues- this area being one of the most disadvantaged in the state.

One of the aims of this diverse group is to provide a coordinated and integrated approach to issues and concerns affecting the community across this area.

A large proportion of the Illawarra’s public housing is located in this region, and as such, the Public Housing Tenants’ Support Bill (**‘the Bill’**) is likely to have a significant impact.

**General Comments**

Whilst the SST is supportive of measures to prevent homelessness, we do not believe the current Bill is the most appropriate mechanism to achieve this. Our primary concerns are:

* The lack of independent oversight over a decision to raise and deduct housing costs (currently a decision to raise arrears must be upheld by the Consumer Trader & Tenancy Tribunal (**‘CTTT’**) before enforcement action can commence);
* The lack of notice given to tenants that such a decision has been made, and the lack of opportunities to appeal this decision;
* The inclusion of housing “costs” as opposed to arrears;
* The inclusion of tenants who are “at risk of” arrears as opposed to actual arrears;
* The fact that the scheme proposes to deduct up to 35% of a tenant’s income, which is recognised as constituting housing stress.

**Recommendations**

The SST strongly recommends that this Bill does not proceed. It is our view that the scheme does not address the cause of rent arrears nor provide a solution for homelessness, and that such a rigid and intrusive mechanism without appeal could entrench the disadvantage for the people it is trying to assist.

However, should the legislation proceed, the SST suggests the following changes in order to lessen the harshest impacts of the Bill:

* That the scheme be limited to rent arrears (rather than housing costs), and that these arrears must be authorised by the CTTT before implementation;
* That the scheme be limited to tenants who are actually in arrears (rather than at risk of arrears);
* That tenants be made aware that the decision has taken place and given the option to appeal to the Administrative Decisions Tribunal; and
* That the 35% cap be reduced to 30% of a person’s income.