

Victorian Housing Register Due Diligence Checklist

Current as of 28 August 2017

This checklist has been prepared by the Community Housing Federation of Victoria to assist its members in preparing for the introduction of the Victorian Housing Register. It is intended to be used as a general guide for due diligence on a decision by the organisation on whether to formally Opt-in to become a Participating Registered Agency in the VHR. Organisations should obtain their own independent legal and financial advice on their unique particular circumstances. We have adopted the same terminology as the draft Allocations Framework released for comment.

Item	Issue	Relevant issues to consider	Status
1	Allocations Framework		
1.1	<p>Analysis of Portfolio to identify properties that should be considered Targeted Social Housing. This is defined as housing owned, controlled or managed by the organisation that has been subsidised by government, including properties in which the Director of Housing (DoH):</p> <ul style="list-style-type: none"> • has an interest (under the Housing Act); • has a security interest (mortgage or charge) <p><i>Properties that are not Targeted Social Housing are outside of the scope of the Priority Allocations Target. The organisation can still allocate to these properties from VHR if desired and the adjustment factor is intended to credit the organisation for priority allocations to such properties.</i></p>	<p>What agreements (e.g. funding deeds, transfers, leases) has the organisation signed with the DoH and other government funding sources?</p> <p>Can the organisation identify properties where the DoH has or is entitled to have an interest?</p> <p>Does the organisation still want to bring properties that are not Targeted Social Housing in to the VHR? (For the purposes of filling vacancies and the priority allocations target.)</p> <p>What tenancy mix has been proposed in past funding submissions? On what basis did government and the organisation separately contribute to properties?</p> <p>This is to identify outcomes that should be considered as subsidised by government and outcomes that should be considered as subsidised by the organisation itself.</p> <p>Does the organisation want to define any separate policy or operational approaches to any or all properties that are not Targeted Social Housing? For example, are such properties:</p> <ul style="list-style-type: none"> • targeted a low to moderate income working households under an <i>affordable housing program</i>? (which may include advertising via real estate listings, rent based on discount to 	

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		<p>market, reviews of eligibility);</p> <ul style="list-style-type: none"> part of alternative funding programs (e.g. funded under the National Disability Insurance Scheme or National Rental Affordability Scheme); properties where other partners (e.g. philanthropic, support or local government) have provided equity in return for the right to refer clients to vacancies. 	
		Does the organisation have systems to identify properties or tenancies that are Targeted Social Housing (and that are not)?	
1.2	<p>Financial impact of Priority Allocations Target <i>This will require Participating Registered Agencies to allocate 75% of vacancies in Targeted Social Housing to Priority Access applicants (subject to the adjustment factor).</i> <i>Note that this target applies to all such vacancies, including those under particular referral pathways)</i></p>	<p>What does the income/rent profile of the Priority Access Group look like? (See data provided by DHHS.)</p>	
		Does the Priority Allocations Target change the overall tenancy mix from the current practice?	
		<p>Will there be a cumulative impact of allocations over time owing to different rates of turnover amongst different tenant cohorts?</p> <p><i>Note that the Priority Allocations Target applies to 75% of vacancies in one year, not properties.</i></p>	
1.3	<p>Allocations Policy and Procedure <i>CHFV has prepared a template policy to assist</i></p>	<p>What does the organisation take into account in allocating tenancies (e.g. sustainable communities, financial viability, links to local community, neighbourhood fatigue, targets for indigenous, disability, supportive communities)?</p>	
		Are any updates to the organisation's Allocations Policy necessary to reflect the VHR and the organisation's approach?	
		Does the organisation need to reflect any nomination rights in the Allocations Policy?	
		Are support providers and partner agencies sufficiently onboarded to the VHR to nominate eligible applicants into vacancies that have nomination rights attached?	
		Does the organisation understand and wish to adopt the Matching Clients with Housing and Special Accommodation Requirements on housing allocation?	

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1.4	Ongoing monitoring and compliance with Priority Allocations Target	How will the organisation monitor whether it is meeting the Allocations Framework and the Priority Allocations Target? (The DHHS will provide a template for reporting through Hiip.)	
2	Transition to VHR		
2.1	Merger of organisation's applicant database (register of interest or waiting list) into VHR See: <ul style="list-style-type: none"> • Stage 3 of the VHR implementation timeline • <i>advice obtained by CHFV from Moores</i> 	How does the existing applicant database compare to data required for VHR application?	
		In the interim period before the organisation formally participates in the VHR, will the organisation continue to accept applications or refer people to VHR application pathways?	
		What internal resources will be required for this process? (DHHS has indicated that some funding will be available)	
2.2	Communication with current applicants <i>See advice obtained by CHFV from Moores</i>	Will the organisation ask current applicants for consent before merging? (This is not legally required.)	
		Have staff been briefed on how to handle enquiries from people seeking housing?	
2.3	Communication with existing tenants and stakeholders	Is there any necessary communications to current tenants about what the VHR means to the organisation?	
		What communication with other stakeholders (e.g. support partners) is necessary about the transition to the VHR?	
2.4	Policy and procedure refresh (to other relevant policies) See: <ul style="list-style-type: none"> • <i>advice obtained by CHFV from Moores</i> • <i>template policies prepared by CHVFV for:</i> <ul style="list-style-type: none"> ○ Allocations ○ Rent-setting ○ Eligibility ○ Complaints and appeals; ○ Privacy and Information sharing 	Are any changes necessary to organisational policies on: <ul style="list-style-type: none"> • Rent-setting (e.g. for an affordable housing program or to provide greater transparency for prospective applicants for social housing); • Eligibility (e.g. to account for VHR eligibility framework) • Complaints and appeals (e.g. to account for VHR's complaints and appeals framework, currently under development) • Privacy and Information sharing (see part 4.3) 	
3	Housing application pathways		
3.1	Organisational approach to applicants for social housing <i>Housing associations and providers that participate in the</i>	Will the organisation provide assistance to people who want to lodge a VHR application? (e.g. applications officer who assists people	

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	<p>VHR can:</p> <ul style="list-style-type: none"> lodge applications on behalf of applicants; and approve applications for certain Priority Access categories (Priority Transfer, Special Housing Needs, Over 55s) 	<p>to lodge application, providing IT access to let people self-serve)</p> <p>NB: this does not include your organisation's functions as an IAP or support provider which needs to be dealt with separately if applicable.</p> <p>If not, where will the organisation refer people who approach the organisation for housing?</p> <p>Which people or roles within the organisation will have the authority to approve Priority Access applications?</p>	
3.2	Referral network for people seeking housing assistance <i>Certain support services will be able to lodge VHR applications and approve applications in Priority Access categories</i>	Which service providers are in the organisation's referral network? (e.g. local IAP services, homelessness support service, other service partners who are part of the VHR)	
3.3	Changes to alternative housing pathways (nomination rights, particular housing and support programs). <i>These will be part of the VHR and the Priority Allocations Target</i>	<p>How will these alternative pathways work in the VHR?</p> <p>Will supported tenants referred by support providers be required to have a current VHR Priority Access application?</p> <p><i>Note that the Priority Allocations Target includes properties subject to nomination rights.</i></p>	
4	Operating in the VHR environment		
4.1	Staff who require access VHR	<p>What are the relevant staff roles that require the ability to access the VHR, create applications and remove applications?</p> <p>How will the organisation ensure that such staff are trained on implications of breaching conditions of use?</p> <p>How will VHR access be embedded in staff induction processes?</p>	
4.2	Other staff (without authority to access VHR) <i>These staff can still share the personal information of applicants with other organisations participating in the VHR in certain circumstances – see advice from Moores. See also DHHS sheet on information sharing</i>	How will the organisation-wide awareness of information-sharing regime, the implications for the privacy of applicants and the consequence of non-compliance?	
4.3	Data security and Privacy policy	Is a refresh of the privacy policy required to account for the VHR?	

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	<p><i>See advice from Moores</i> <i>See template Privacy and Information Sharing policy prepared by CHFV</i></p>	<p>Is there a need to refresh materials (e.g. brochures, privacy statement) provided to tenants and applications about privacy and confidentiality?</p>	
		<p>Do operational policies make it clear to staff the requirement to only use, access and disclosure personal information in the VHR for purposes authorised by the Housing Act?</p>	
		<p>Are there procedures in place to remove a person's access to the VHR if the person if stop working in the organisation or changes roles?</p>	
		<p>Does the organisation need a plan to deal with data security breaches?</p>	

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