

7 July 2022

Australian Institute of Health and Welfare
By email: hhadmin@aihw.gov.au

Dear AIHW,

Thank you for the opportunity to provide a submission in response to the consultation paper on creating a national community housing data strategy.

The Community Housing Industry Association of Victoria (CHIA Vic) is the peak body that represents the not-for-profit community housing sector in Victoria. Our national peak body, CHIA, are making a separate but complementary submission which we support.

We welcome the opportunity this work presents to improve data quality and create nationally consistent data sets.

The key priorities of our sector are to ensure data is accurate and reported in a timely, reliable, and meaningful way and to minimise the administrative burden associated with data collection and reporting. Such reporting will be valuable in improving transparency and creating a clear picture of social housing services to help drive continuous improvements.

Further details on the areas of greatest importance to our sector are outlined below:

Scope

A broad definition of community housing has been adopted for the consultation report and for current AIHW data collection purposes. Using this broad definition, AIHW currently seeks data from 79 Victorian CHOs with 57 of those organisations participating in the most recent survey.¹

There were 38 registered CHOs delivering rental housing services in Victoria during this period so this data includes results from a high proportion of CHOs that are not registered under the Victorian regulatory scheme.

As unregistered CHOs are not bound by the same data collection requirements and do not report to the Housing Registrar, there are risks that measurement approaches are not aligned, and that the quality of the data collected is negatively impacted by this.

By including only registered CHOs in the data collection, there would be a small loss in the range of housing within scope, but this would be a relatively minor proportion of total community housing (as the vast majority of housing is delivered via the registered sector). In our view, any negative impacts

¹ Community Housing Data Collection, 2020–21; Quality Statement, available at <https://meteor.aihw.gov.au/content/749875>.

by this limiting of scope would be offset by the improvement in data quality and the ability to improve data collection approaches.

Collection Approach

The strategy should seek to embed the principle of “report once use many times” in community housing data collection.

There is currently overlap and duplication with separate reporting for regulatory, contractual and service evaluation purposes and this review provides an opportunity to plan for the streamlining of reporting obligations and avoidance of duplication.

In our view, community housing data collection should be aligned and managed by the relevant regulatory bodies in each jurisdiction.

Definitions and Counting Rules

As acknowledged in the report, the quality, consistency and timeliness of national data is compromised by differences in scope, definitions and completeness across jurisdictions.

We see the development of this strategy as an opportunity to establish a uniform and nationally accepted set of definitions, counting rules, reporting and collection approaches that are designed to improve data quality and consistency and provide increased transparency and understanding of community housing services.

Data Requirements and Presentation

The diversity of social housing services will create some challenges and it will be important to ensure that collation of data does not create a misleading impression and comparisons are not inappropriately made between differing services. For example, data from transitional housing programs that are designed to be short term and target complex clients should be appropriately contextualised to ensure comparisons are not inappropriately made with long term housing programs.

Stability of Measures

Changes to data requirements create costs for CHOs as they require changes to data collection systems and approaches. Change is not simple in this area because each organisation has developed their own data collection approaches and there are a range of information technology systems in use to collect, store and report on performance.

There are added barriers for CHOs working across multiple states and territories as they are required to meet multiple sets of reporting requirements for essentially the same activities. The more regulatory requirements diverge across jurisdictions, the more difficult this becomes.

It is preferable from both a reporting perspective, and to ensure resources are not wasted, if performance indicators, definitions and counting rules can be agreed to at a national level and changed as infrequently as possible.

Public Housing Data

When examining ways to improve community housing data quality and create nationally consistent data sets, the opportunity to align community housing and public housing data should also be examined. Aligning measurements, definitions and counting rules across public and community

housing would provide an opportunity for all stakeholders to gain a greater understanding of the social housing system as a whole.

Workforce Data

There is a lack of quality data on the size and makeup of the community housing workforce. The ACNC and Housing Registrar collect staffing numbers, but they do not require a breakdown of the roles and therefore do not separate housing from support or homelessness staff. With many organisations providing both services and often a range of other services, it is not possible to separate out the community housing data from these existing data sets.

The collection of community housing specific data would enable all CHOs to analyse their results against industry benchmarks and it would assist with workforce development planning initiatives.

Measuring Outcomes

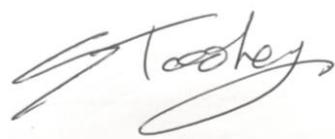
The community housing sector has been working towards a better understanding and improved measurements of tenant outcomes as a result of having safe, secure and affordable housing.

Measuring outcomes helps community housing organisations to make decisions about how to design and deliver services based on the needs and experiences of renters. It also helps community housing organisations to demonstrate their social impact. Over time, it is hoped that outcomes data can be aggregated across the community housing sector to support shared learning and continuous improvement, and to enable the sector to tell a collective story of the benefits of community housing.

While we strongly support this objective, we understand that there will be significant challenges in agreeing on outcomes measurements and ensuring that they are meaningful and consistent across a range of services. Therefore, this should be a more long-term goal than the other data collection changes discussed, but the development of the strategy is an opportunity to begin a transition to measuring social outcomes for social housing renters at a national level.

Thank you again for your consideration of this feedback and we are happy to meet to discuss this further.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S Toohy', written in a cursive style.

Sarah Toohy

CEO