



Council of Social Service of New South Wales

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Dear Ms Carvajal

Thank you for your email of 20 March 2008 seeking comments from NCOSS on the draft consultation paper *Future Directions Tenant Participation Program March 2008*.

NCOSS would like to make some general comments on the process surrounding the discussion paper before we address the specific proposals that are outlined in it.

Coverage of the paper

Despite its title, it is apparent that the discussion paper is essentially concerned with future arrangements for the current Regional Tenant Resource Services (RTRS) and Public Tenant Councils/Tenant Representative Councils. In relation to these bodies attention is very much focused on funding arrangements, rather than broader questions of philosophy or intended outcomes. The paper does not really address other elements of the Tenant Participation Program such as the state-wide Social Housing Tenants Council or funding under the Housing Communities Assistance Program (HCAP). NCOSS suggests that the paper should be renamed Future Directions Tenant Resource Services to more accurately reflect its specific focus.

Our second concern is that we are asked to comment on a paper that outlines the Department's response to the findings and recommendations of a review carried out in 2007 by consultants ARTD without being provided with access to the final report of that review. It is also clear that the proposals in the consultation paper differ from the draft recommendations that were discussed at the consultation workshop held on 29 May 2007, at which NCOSS was represented. No explanation has been provided for the change in thinking that has occurred in the meantime. This is an entirely unsatisfactory situation which does not reflect the partnership approach to such matters that is supposed to apply under the *Working Together for NSW* compact between the NSW Government and NCOSS/FONGA.

Given this, NCOSS urges the Department to publicly release the review report and then provide a further opportunity for comment to be made on the consultation paper.

I turn now to our comments on the specific contents of the consultation paper. These follow the structure of the paper itself.

Background (About the TP program; ARTD Review and TP Program Strengths; Policy context for reform)

Without access to the findings of the review, it is difficult to provide detailed comment on this section of the consultation paper. It is also notable that no difficulties or challenges are outlined as part of the context for the changes that the Department is proposing. This is in contrast to the consultation workshop last year where the consultants explicitly spoke about the strengths and weaknesses of current arrangements.

Proposed new funding arrangements (Aims; Key elements; Core TPRS Activities)

Aims

NCOSS is generally happy with the proposed aims.

Key elements

In essence the proposal in the consultation paper is that the existing Regional Tenant Resource Services (RTRS) and Public Tenant Councils (PTC) resources and functions be amalgamated into Tenant Participation Resource Services (TPRS); that the number of resource services be increased from 7 to 9, with new services being established in the Riverina and western areas; and that the budget for the combined program be increased by approximately \$1.8 million over three years.

NCOSS welcomes the proposal to increase the number of resource services and to increase the budget for the program. In the absence of the review's findings or any rationale for the changes proposed by the Department, we cannot, however, support the rest of the proposals. In essence Public Tenant Councils/Tenant Representative Organisations are to be downgraded with the focus and all funding going to Regional Tenant Resource Services. No such proposal was discussed at the May 2007 consultation workshop and we have received no explanation for why this change is being proposed.

NCOSS notes that at the consultation workshop the consultants indicated that the function of tenant representative organisations was generally seen as important, but that the effectiveness of the organisations that are currently funded varies. Their strengths were seen to be the capacity to work well with tenants, that they were independent and autonomous, they had substantial volunteer input and they provide effective structures for two-way communication (between the Department and tenants). Their weaknesses were said to be concerns about governance and representativeness, that they had lost the confidence of stakeholders in some locations, they receive a low level of resourcing, and there was confusion as to whether the funding was designed to support a function or a structure.

Core TPRS activities

The consultation paper proposes that the core TPRS activities encompass tenant engagement; department liaison and advice; communication, advice and referrals; community building; and partnership, linkages and networks. These seem broadly appropriate.

Implementation Arrangements (Transition Phase; TPRS EOI Phase)

Transition phase

The consultation paper suggests that all current RTRS and PTC funding contracts be extended by 12 months to June 2009. Services would, however, be required to submit an annual service plan for 2008-09 in line with the proposed core activities outlined in the consultation paper. NCOSS has no objection to this proposal.

TPRS EOI phase

The consultation paper suggests that a tender process commence in September 2008, with expressions of interest closing in December 2008, for resource services to receive two-year funding for 2009-10 and 2010-11.

NCOSS does not support these proposals. The Department should properly consult with relevant stakeholders before proceeding to make changes to existing arrangements and program guidelines. At the very least this requires it to release the report of the review that was completed last year.

In relation to the proposed EOI process, NCOSS reiterates the view we expressed at the May 2007 consultation workshop. We do not believe it is appropriate that resource services that have been operating satisfactorily should have their future determined via a competitive tender process. Separate arrangements can be put in place for the two new services that are proposed. We note that at the May 2007 workshop the Department's only justification for this proposal to shift to an EOI process was the statement that it was NSW Government policy to do so, and that the consultation paper contains no arguments in favour of this change to the tenant participation program.


In relation to the question of NSW Government policy on NGO funding, the position of NCOSS is outlined in our July 2006 paper *Working Together for NSW: Good Funding Policy and Practice*, a copy of which is enclosed with this letter.

Conclusion

NCOSS recommends that the Department provide interested stakeholders with a copy of the review report, and then provides groups and individuals with a further opportunity to comment on the consultation paper.

If you would like to clarify any aspect of this letter please do not hesitate to contact Warren Gardiner, Senior Policy Officer, on 9211 2599 ext 112 or email warren@ncoss.org.au

Yours faithfully



Alison Peters
Director

Encl.