Community housing Managing the housing register guideline



Guideline details

Name and version number: Community Housing - Managing the housing register guideline v1

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Policy Author: Robyn Macro, Monique Pringle

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Overview of changes and development

This is your historical record of how this document was developed. Include information about what's changed and why, who was consulted and when:

- Guideline developed to support implementation of Single Housing Register (SHR) and superseding of the Community Housing Customer Register
- Renamed from Registering Community Housing Customers and Managing Vacancies and moved to SAHA template
- Introduces process for CHP staff/members Users to gain access to the SHR system
- Added specific screening clearance requirements as allowed under the Access Deed
- Clarified when documents should be uploaded to the SHR
- Implementation of benefit dates in line with SHR system
- Clarification of primary contact organisation role
- Change includes registrants under witness protection with 'restricted' status on SHR
- Introduction of SHR automated register audit process including the new Category 1 registration expiry and review process – clarified that SHR automatically defers, downgrades and sends letter if no response to Cat 1 review
- Amendment of deferral and cancellation processes in line with SHR system
- Added requirement for providers to get proof of death before cancelling registration
- Added that customers can update some information or cancel a registration online
- Customers can respond to audit online if there are no changes to their registration, or if they want to cancel their registration

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This guideline sets out how community housing providers (providers) and Volunteer Member Tenant Managed (VMTM) providers (housing cooperatives) manage registrations on the Single Housing Register.

This guideline applies to:

- providers registered under the <u>National Regulatory System for Community Housing</u> (<u>NRSCH</u>) <u>including</u> volunteer member-tenant managed providers who
 - have a community housing agreement (eg Master Agreement) with the South Australian Housing Trust or the SA Housing Authority or
 - are party to a SAHT Transfer program for example Better Places Strong
 Communities (BPSC) and Renewing our Streets and Suburbs (ROSAS) or
 - are party to any other agreement which references the community housing policies
- non-government organisations which have housing leases with the South Australian Housing Trust (SAHT) which specifically reference this policy, including <u>specialised</u> housing programs
- · community housing tenants transferring to a separate social housing provider

It does not apply to internal tenant transfers within individual community housing provider portfolios. Internal transfers are covered by the provider's own policies.

1 Giving a User access to the Single Housing Register

In order to access the Single Housing Register, providers registered under the NRSCH must have entered both the below agreements with the SA Housing Authority:

- the Single Housing Register Access Deed
- the Data Sharing Agreement under the Public Sector (Data Sharing) Act 2016

The Agreements set out:

- what information is shared through the Single Housing Register
- who can access the information
- how information is used
- how the organisations ensure safe data sharing

In relation to information contained in the Single Housing Register, the Single Housing Register Access Deed requires providers to comply with either the Australian Privacy Principles (if they're required by law to comply with them), or the Information Privacy Principles as if they were a government agency.

Community housing staff and VMTM providers (housing cooperative) members who are <u>approved Users</u> are able to:

- access the Single Housing Register to create and manage customers on the register
- make offers of housing and allocate tenants to community housing.

1.1 Requirements for adding Users

To request access to the Single Housing Register, community housing staff and members of VMTM providers (housing cooperatives) complete a Single Housing Register Access Request form and send it to their organisation's System Administrator.

In line with the Data Sharing Agreement, the community housing provider's System Administrator adds Users if the proposed user:

- is an employee of the community housing provider or a member of a volunteer member-tenant managed provider
- has completed initial and mandatory training for the Single Housing Register as required by the SA Housing Authority
- has provided a satisfactory criminal history check to the organisation, which from 2021 must include a National Police Clearance
- has provided to the community housing provider a DHS Screening Unit Working with Vulnerable People check
- has provided any other DHS screening check (or equivalent) as required by SA Housing Authority
- doesn't have a housing registration on the Single Housing Register

The System Administrator:

- updates and signs the Single Housing Register Access Request form to record that the User has been authorised
- stores the completed form
- updates the organisation's register of Single Housing Register Users
- · creates a Single Housing Register account for the User
- emails the User their Single Housing Register log in details

1.2 Register of Users

Community housing providers are required to keep a secure register of Single Housing Register Users, detailing:

- their name
- their date of birth
- · the user security level authorised
- the date of the user was authorised
- details of their National Police Clearance, including the date and reference number
- details of DHS screening check/s, including the date and reference numbers
- Any issues associated with the user's access
- A copy of the information contained in the SHR Access Request Form and attachments

Community housing providers are required to appropriately maintain user accounts, for example Users' ability to access to the Single Housing Register must be removed as soon as possible when Users change jobs or leave the organisation.

A record of Users of the Single Housing Register is stored in the system and the SA Housing Authority reserves the right to audit Users' access.

2 Registration and benefit dates

Customers wishing to register their interest in housing cooperatives must complete a Registration of Interest form and submit it to their primary contact organisation. If the customer or the volunteer member-tenant managed provider want Housing SA to manage that registration, any Housing SA office or the Housing SA Contact Centre will be able to provide registration assistance.

Registrations of interest in housing are placed in the category the customer is eligible for based on either:

- the date they were approved for Category 1 or 2
- the date they were registered for Category 3
- any benefit date they're eligible for

2.1 Benefit dates

A customer may be eligible to have their registration backdated, also known as applying a benefit date. This overrides the date the registration was processed.

A provider staff member can backdate up to 10 calendar days when they process the registration of interest in the Single Housing Register. A CHP manager can approve a backdate that's more than 10 calendar days.

The reasons a registration could be backdated are:

- a customer was previously on a registration with another person and now wants to register their interest independently
- a public, Aboriginal or community housing tenant's relationship breaks down and their partner wants to register their interest independently
- there's a delay of more than 10 days in processing the registration
- there's a provider error, for example the registration was cancelled incorrectly

3 To assign 'restricted' status to a customer

The primary contact organisation can contact Housing SA to assign the restricted status to a customer if access to the customer's personal information by other housing providers should be restricted.

If a customer is assigned restricted status, it can only be accessed by either:

- the primary contact organisation
- Housing SA

If a customer's record is assigned restricted status and another housing provider shortlists the customer, the provider can view the registration information only. The provider should ask the primary contact organisation or Housing SA for the customer details.

In certain circumstances, for example, where a customer is under witness protection, registrations should be entered in the single housing register, with changed name and profile to meet the witness protection requirements. Hard copy documents are still to be uploaded to Client Document.

4 Update a registration

Customers update their contact details at any time either:

- online using **Housing Connect**
- by contacting any housing provider (by phone or in person)

Customers can cancel their registration either:

- online using **Housing Connect**
- by contacting their primary contact organisation or Housing SA

Customers complete and send a <u>Change of circumstances form</u> to their primary contact organisation or Housing SA if they want to update any other information, including:

- to change the housing providers they registered with
- to change the areas they're registered for
- if they legally change their name
- to add or remove someone from their registration
- if their household circumstances or income changes.

The customer also provides proof of <u>income and identity</u> for anyone they add to their registration aged 16 and over with an <u>independent income</u>.

The primary contact organisation is responsible for:

- returning an incomplete form, for example it isn't signed, to the customer along with a letter informing the customer why the form has been returned
- sending a letter asking the customer for proof of income or identity if its missing
- contacting the customer if they indicate they're at risk to discuss their circumstances and action accordingly
- updating the registration in the Single Housing Register

If the customer has registered for volunteer member-tenant managed community housing (housing cooperative), the information on the <u>change of circumstances</u> form can be updated on the Single Housing Register by the organisation itself, or by its managing provider (where this applies), or by Housing SA.

4.1 Customer's child registering interest independently

A child included in their parent or guardian's registration of interest can register their own interest independently at any time provided they're eligible.

They aren't eligible for any benefit date relating to their parent's registration.

4.2 Amalgamating two registrations

If two customers with separate registrations of interest decide to have a single registration, add the second customer to the active or deferred registration with the earliest registration or benefit date. Cancel the second customer's registration.

4.3 Splitting a joint registration

A customer with a joint registration can register their interest independently at any time provided they're eligible.

They may be eligible for a benefit date if the joint registration was active or deferred when they registered their own interest.

If the joint registration is in Category 1 or 2, the new registration may be backdated to the date the joint registration was approved for the category provided the customer's eligible for Category 1 or 2 in line with the <u>community housing allocation policy</u> and a Community Housing Manager approves it.

If the customer's not eligible for Category 1 or 2, backdate the new registration to the registration or benefit date on the joint registration before it was approved for Category 1 or 2.

4.4 Change a primary contact organisation

Change to a community housing provider

Customers can ask their preferred community housing provider to be their primary contact organisation (PCO) at any time by contacting it directly. The community housing provider can refuse to be the PCO, for example if it doesn't have housing in the areas the customer wants to live in or the customer isn't suitable for the housing programs it offers. If the community housing provider refuses, it tells the customer why.

If the community housing provider agrees, it asks the customer's current PCO to change the customer's PCO in the Single Housing Register. If the provider does not agree to become the customer's PCO, the current PCO remains in place. Only the current PCO and Housing SA can change the PCO in the Single Housing Register.

Change to Housing SA

Customers can ask their current primary contact organisation to change their primary contact organisation to Housing SA.

The current primary contact organisation updates the Single Housing Register. Housing SA always agrees to be a primary contact organisation.

5 Category 1 reviews

Registrations in Category 1 are reviewed every year on the date they were approved for Category 1. The aim of the review is to make sure the customer's still eligible for Category 1.

A customer's primary contact organisation completes their Category 1 review.

The Single Housing Register automatically sets the registration's status to 'REVA Review Underway' and sends customers a Register audit Category 1 appointment required letter asking them to book an appointment with their primary contact organisation within 14 days of the date of the letter. The appointment can be conducted over the phone.

Assess the customer's eligibility for Category 1 in line with the relevant parts of the community housing - housing needs assessment guideline.

Either:

- keep the registration in Category 1, or
- move the registration to another category (requires CHP Manager approval)

The provider will manually generate a <u>Register audit outcome of review letter</u> telling the customer about the outcome of the review.

Customers can ask to be re-assessed for Category 1 at any time if they have urgent housing needs.

Category 2 and 3 review

Contact customers in Category 2 and 3 every 12 months to make sure they still have a need for housing and their information's correct and up to date. Details are below under Auditing Registrations.

Moving registrations between categories

The primary contact organisation may move a registration between categories in any of these situations:

- the registrant's circumstances change
- as a result of reviewing the registration of interest
- the registrant doesn't respond to contact from the primary contact organisation, for example to review their registration of interest

If a customer's registration of interest is approved for a higher category, the category start date is the date they were approved for the higher category.

If a customer's registration moves from Category 1 to Category 2, the category start date is the earliest of the below dates:

- the dates they were approved for Category 1
- the date they were approved for or automatically eligible for Category 2

If a customer's registration moves from Category 1 or 2 to Category 3, they keep their original registration or benefit date.

5.1 Customer doesn't contact

For Category 1 reviews, if the customer doesn't respond within 42 days of the date on the letter, or before their category review is due, the following steps occur automatically as part of the register audit:

- their registration moves to either Category 2 (if auto category 2 entry is met) or Category 3
- their registration's deferred for 12 months
- the customer is sent a Registration of interest or transfer deferred letter or Registration of interest or transfer partially deferred letter telling them about the changes

If the customer makes contact while their registration is deferred, their registration will be automatically reactivated if their circumstances are the same after a contact is recorded, or

conduct a new <u>Housing Needs Assessment</u> if needed. Only backdate the customer's category start date if both the below apply:

- they're still eligible for Category 1
- they missed their Category 1 review because of exceptional circumstances, for example they were in prison or hospital and can confirm this.

6 Category review before an offer of housing

The provider may <u>review</u> a customer's registration of interest if in Category 1 or 2 if their <u>circumstances</u> have changed.

The provider assesses the customer's eligibility for Category 1 and 2 in line with the <u>community housing – housing needs assessment guideline.</u> The provider manually sends the customer a Register audit outcome of review letter telling them about the outcome of the review.

If the customer doesn't respond or refuses to participate, make reasonable attempts to contact them. If you still can't contact them, move the registration to another category and defer it.

7 Auditing registrations – Category reviews

Active registrations of interest for community housing placed in Category 2 and 3 are audited once a year to make sure they still have a need for housing and their information's correct and up to date.

The Single Housing Register automatically sets the registration's status to 'REVA Review Underway' and sends customers a Register audit form completion required letter and Registration of interest in housing review form asking them to confirm:

- they still want to keep their registration active
- their information's correct and up to date

Customers can respond online using **Housing Connect** if either:

- there's no changes to their registration
- they want to cancel their registration

Otherwise, they complete the Registration of interest in housing review form and return it to their primary contact organisation. Once a contact is recorded against the registrant, the system will automatically reactivate the registration.

If the customer doesn't respond within 30 days of the date on the form, their registration is deferred for 12 months.

8 Defer a registration

Deferred registrations don't appear on shortlists for housing and won't be considered for or offered housing. Deferring a registration doesn't affect its registration or benefit date.

A registration may be deferred for one type of housing provider but still active for another. For example, if a customer is registered for public and community housing and has a debt to Housing SA, their registration may be deferred for public housing but active for community housing.

If the registration was approved Category 1 or 2 after a <u>Housing Needs Assessment</u>, the category will be automatically moved to a different category once the registration is deferred in the system.

When a registration is deferred, generate and send through Connect either a:

- Registration of interest or transfer deferred letter if the customer's registration is deferred for all types of housing
- Registration of interest or transfer partially deferred letter if the customer's registration is deferred for some types of housing

8.1 Defer a registration for 12 months

Registrations are deferred for up to 12 months in any of the below circumstances:

- the customer can't be contacted or doesn't respond to an attempt to contact them
- more information's needed to process an offer of housing, for example they still need to provide proof of identity
- the customer isn't eligible for housing when they're considered for an offer of housing, for example they don't meet the income limits, or they aren't living in South Australia
- the customer temporarily can't accept an offer of housing
- the customer accepts a short term lease agreement, for example they're housed in the Homelessness Supportive Housing program.

The primary contact organisation can override deferring a registration for a customer who isn't living in South Australia if they confirm there are exceptional circumstances, for example they've been living interstate to care for a terminally ill relative.

The Single Housing Register automatically cancels the registration at the end of the deferral period, except if:

- the registrant accepts a short term lease agreement, for example <u>Homelessness</u> Supportive Housing program.
- The registration is for housing managed by Housing SA in an Aboriginal community.

If the registration was deferred because the customer accepted a short-term lease agreement, the provider managing the tenancy reviews the customer's circumstances at the end of the deferral period and either:

- reactivities the registration
- cancels the registration

If a registration for housing managed by Housing SA in Aboriginal communities is deferred, manually reactivate it when the reason why the registration was deferred no longer applies, for example the customer was temporarily unable to access offers but can now accept offers.

8.2 Temporarily unable to accept offers of housing

Defer a registration for 12 months where a customer in any of the following circumstances, as they are temporarily unable to accept an offer of housing:

- they'd be financially penalised if they accepted an offer of housing, for example they'd be breaking a private rental lease agreement and the bond would be claimed
- they live with and care for an aging or ill partner or dependent who can't move with them if they were offered housing
- someone in their household has a disability that needs ongoing professional support to live independently, but support isn't available at the time an offer of housing was considered
- someone in their household is seriously ill and moving would aggravate the illness
- they'd have to give up temporary paid employment or a training or education course because it's too far to commute
- they're currently in an institution, for example prison or hospital

8.3 Extending the deferral period

A customer can ask for an extension of the deferral period. The provider assesses the customer's circumstances and can approve deferring the registration for up to another 12 months in any of the below situations:

- someone in the customer's household has continuing health problems
- the customer's waiting on support services to be provided
- bankruptcy hasn't been discharged

The provider may ask for confirmation of their circumstances. The Single Housing Register will automatically cancel this registration after the additional 12 month deferral has lapsed, except if the customer accepts a short-term lease.

9 Reactivate a deferred registration

Reactivate a deferred registration when the customer contacts except if the reason why the registration was deferred still applies, for example they still need to provide proof of identity.

Before reactivating a deferred registration:

- confirm the customer's identity
- make sure the registration hasn't been cancelled
- confirm the customer's circumstances haven't changed
- talk to the customer about whether they want to update their registration preferences, for example areas or housing providers they registered for

The reactivated registration is placed in the category the customer's automatically eligible for.

9.1 Category approval dates

If the registration was approved for Category 1 or 2 before it was deferred the customer can ask for a <u>Housing Needs Assessment</u> to reassess them for Category 1 and 2 in line with the community housing – housing needs assessment guidelines.

If they're approved for Category 1 or 2 again, the new approval date applies and not the approval date they had before their registration was deferred.

In exceptional circumstances a provider can approve backdating the registration to the approval date they had before their registration was deferred. For example, the customer was in hospital when their category was changed and their registration deferred.

10 Cancel a registration

Cancel a registration in any of the below situations:

- the customer asks to cancel it
- the customer dies and the provider has proof of their death (a death certificate)

Customers can ask to cancel their registration either:

- online using <u>Housing Connect</u>
- by contacting Housing SA or their primary contact organisation

The customer is sent a Registration of interest cancelled letter or Registration of interest partially cancelled letter (where the registration is deferred for some types of housing). These two letters will be automatically triggered and sent if the cancel reason is 'customer request' or 'unable to accept offers'.

In some situations, the Single Housing Register automatically cancels registrations at the end of a deferral period.

Once a registration is cancelled it can't be reactivated. Customers may register their interest in housing again at any time provided they're eligible in line with the <u>community housing</u> eligibility policy.

If the registration's cancelled and the customer registers their interest again, they only receive a benefit date from the cancelled registration if the registration was cancelled either:

- while they were housed on a short term lease agreement
- while they were in an institution, for example prison or a hospital, and they can confirm this

11 Related information

11.1 Controlling documents

This procedure is based on:

- Community Housing Providers (National Law) (South Australia) Act 2013
- National Regulatory System Community Housing Regulatory Framework
- Residential Tenancies Act 1993 (SA)
- Single Housing Register Access Deed
- Data Sharing Agreement under the Public Sector (Data Sharing) Act 2016
- Community housing allocations policy
- · Community housing eligibility policy

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11.2 Supporting documents

- Community housing allocations guideline
- Community housing housing needs assessment guideline
- · Community housing eligibility guideline
- Single Housing Register Access Request form
- Proof of income, identity and rent www.housing.sa.gov.au
- Income and asset eligibility limits www.housing.sa.gov.au
- Register for housing Ole
- Housing Connect

11.3 Date this guideline/ procedure applies from

1 March 2021

11.4 Version number

1

11.5 Disclaimer

This procedure can be changed, withdrawn or replaced at any time.

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