



**Submission to
Tasmanian Government
State Budget Community Consultation Process
2011-12 Budget**

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for further information, please contact:

Dr Chris Jones

Chief Executive Officer

Anglicare Tasmania

GPO Box 1620, HOBART TAS 7001

ph: 03 6231 9602

email: c.jones@anglicare-tas.org.au

1. Introduction and list of recommendations

Anglicare Tasmania welcomes the opportunity to have input into the State Budget community consultation process for 2011-12. In this submission, we have chosen to focus on three key areas of concern: the shortage of affordable housing, rising electricity prices and access to the financial administration services provided by the Public Trustee. The submission draws on extensive research and policy development work and the direct experience of Anglicare workers from our services.

Anglicare is the largest community service organisation in Tasmania, with offices in Hobart, Glenorchy, Launceston, St Helens, Devonport and Burnie, and a range of outreach programs in rural areas. Anglicare's services include emergency relief and crisis services, accommodation support, employment services, mental health services, acquired injury, disability and aged care services, alcohol and other drug services and family support. In addition, Anglicare's Social Action and Research Centre conducts research, policy and advocacy work with a focus on issues affecting Tasmanians on low incomes.

In this submission, Anglicare makes the following recommendations:

1. That Housing Tasmania be provided with an operating subsidy to meet the gap between the rent paid by tenants and the market rent on the property (i.e. a subsidy equivalent to the value of the rental rebate).
Lead agency: Housing Tasmania — Department of Health and Human Services
Estimated cost: \$37 million per annum, recurrent, plus indexation.
2. That Tasmanian community housing associations be provided with an operating subsidy that allows them to cover their costs and deliver genuinely affordable rents to tenants.
Lead agency: Housing Innovations Unit — Department of Health and Human Services
Estimated cost: Uncosted
3. That the Tasmanian Government fund a consultation process around public housing reform.
Lead agency: Housing Tasmania/Housing Innovations Unit — Department of Health and Human Services
Estimated cost: \$25,000, with recurrent funding required in future Budgets to maintain the process over time
4. That \$200,000 be allocated to Consumer Affairs and Fair Trading to allow it to undertake greater and more proactive enforcement activity.
Lead agency: Consumer Affairs and Fair Trading — Department of Justice
Estimated cost: \$200,000 per annum, recurrent, plus indexation
5. That the Tasmanian Government increase funding to Tasmanian specialist homelessness services to meet increased demand.
Estimated cost: Uncosted
Lead agency: Housing Tasmania — Department of Health and Human Services.

6. That the Tasmanian Government provide an additional \$154,000 for specialist homelessness services brokerage funding, and apply indexation in forward estimates to ensure the value of the funding is maintained over time.
Estimated cost: \$154,000 per annum, recurrent, plus indexation (on total brokerage funding of \$554,000)
Lead agency: Housing Tasmania – Department of Health and Human Services
7. That the Tasmanian Government work with Aurora Energy to implement an inclining block tariff for all residential customers, with the first block in the tariff treated as a ‘lifeline’ block, priced affordably and quarantined from further price increases (apart from inflation).
Lead agency: Shareholder Policy and Markets Branch – Department of Treasury and Finance
Estimated cost: Uncosted
8. That the Tasmanian Government abolish the existing electricity concession and replace it with a two part concession – a flat rate concession applied to the fixed charge and a capped percentage rate concession applied to consumption above the ‘lifeline’ block (see Recommendation 5).
Lead agency: Shareholder Policy and Markets Branch – Department of Treasury and Finance
Estimated cost: \$25 million (approx.) per annum, recurrent, plus indexation – as for existing concession
9. That \$4.02 million be allocated to fund a statewide energy efficiency retrofitting and support program targeting low income households in home ownership, private rental and public housing.
Lead agency: Tasmanian Climate Change Office – Department of Premier and Cabinet
Estimated cost: \$4.02 million, one-off
10. That annual funding of \$1 million be allocated to Tasmanian emergency relief services for general disbursement to clients in financial crisis.
Lead agency: Social Inclusion Unit – Department of Premier and Cabinet
Estimated cost: \$1 million per annum, recurrent, plus indexation
11. That the Tasmanian Government allocate \$155,000 per annum in additional funding to the Public Trustee, via its community service obligation agreement, to abolish all fees and charges for represented persons on low incomes.
Lead agency: Shareholder Policy and Markets Branch – Department of Treasury and Finance
Estimated cost: \$155,000 per annum, recurrent, plus indexation

2. Housing for all Tasmanians

2.1. Tasmania Together

The Tasmania *Together* benchmarks most relevant to housing and homelessness services fall under Goal 1 (a reasonable lifestyle and standard of living for all Tasmanians). Progress against these benchmarks is not encouraging. They include:

- Indicator 1.1.1, the proportion of income taken up by a ‘basket’ of essential items. Although performance against this indicator has varied, overall since 2001 there has been a significant

increase in the proportion of income taken up by the selected basket of items, and it is unlikely that the target for 2010, or even 2015, will be achieved.

- Indicator 1.1.4, the proportion of Tasmanian low income earners experiencing housing stress. The proportion has consistently increased since this measure was included in the *Tasmania Together* benchmarks. The target for 2010, or even 2015, is unlikely to be achieved.
- Indicator 1.1.5, the house price to income ratio. While the house price to income ratio has stabilised in recent years, the target for 2010 is unlikely to be achieved.
- Indicator 1.1.6, the waiting times for priority applicants on the public housing waiting list. Waiting times have remained consistently high, at just over 20 weeks, and it is unlikely that the 2010 target will be achieved.

Anglicare has welcomed the recent expenditure on housing in Tasmania, particularly the 500 new social housing properties expected to result from the economic stimulus package. However, it does not seem that this level of investment will be maintained at the federal level, which means that further action will be required by the Tasmanian Government to address the ongoing shortage of affordable housing.

2.2. The public housing system

In 1993, the Industry Commission (now the Productivity Commission) found that public housing was the most efficient and effective way for the Government to provide housing assistance (Industry Commission 1993). Anglicare's extensive research on this issue concludes that there is little evidence to suggest that this assessment has changed. The main problems facing the public housing system concern the specific funding model used, rather than broader systemic flaws. The alternative that is being promoted by the Australian Government and supported by the States and Territories — establishing large community housing associations that leverage private investment in order to increase stock numbers — does not appear, on the evidence available to date, to be able to deliver the same level of support and access to people most in need, and requires large government subsidies to deliver sufficient growth in supply to be worthwhile. In addition, linking the government's response to housing market failure to the market (through private investors) is fraught with risk, particularly in times of economic downturn.

Recommendation 1: That Housing Tasmania be provided with an operating subsidy to meet the gap between the rent paid by tenants and the market rent on the property (i.e. a subsidy equivalent to the value of the rental rebate).

Lead agency: Housing Tasmania — Department of Health and Human Services

Estimated cost: \$37 million per annum, recurrent, plus indexation

Rationale: The main financial problem facing public housing is its lack of an operating subsidy to cover the gap between rental revenues and the cost of provision. This is partly an historical anomaly — public housing once accommodated a wider range of people, including people who were in employment, which meant that rental revenue was once much higher and theoretically at least could cover the full operating cost of the system. With government policies and growing need now requiring public housing to be targeted to those in greatest difficulty, rental revenues have fallen markedly. Yet rental revenues are still expected, in theory if not in practice, to deliver operational viability. This has led to pressure on public housing authorities to raise rents, even though increases are not affordable for tenants.

While an operating subsidy would not resolve all of the problems facing Housing Tasmania, such as the age and condition of many public housing properties, it would place Housing Tasmania in a much stronger financial position, allowing it to generate a surplus, which could then be used to address outstanding maintenance issues and invest in new stock. It would not immediately eradicate Housing Tasmania's outstanding maintenance liability or immediately fund enough new construction to overcome Tasmania's persistent housing crisis; these issues would need to be addressed separately through capital grants. But it would allow Housing Tasmania to operate more sustainably in the future, and provide an important buffer against the pressure to raise rents, thus protecting tenants from further hardship.

Anglicare estimates that such an operating subsidy, designed to bring Housing Tasmania to the position of earning a market rate for its properties, would cost \$37 million per annum plus indexation.¹

1.3. Community housing

Governments are increasingly embracing the community housing sector as holding the answer to ongoing issues of housing affordability. The Australian Government is committed to establishing a system of 'growth providers', community housing associations which would leverage their assets in order to fund the purchase or construction of more community housing, thus growing supply (Australian Government 2010, p. 8). Anglicare supports community housing, but as a complementary system to a sustainable and robust public housing sector. We do not believe the community housing sector has the capacity in the short to medium term, or even the long term, to grow sufficiently to replace public housing as the provider of housing to those people most in need. We note that the supply projections modelled on behalf of the Australian Government by KPMG (FaHCSIA 2009) predicted national growth of just a few thousand social housing properties after five years.²

Anglicare's position is that any attempt by governments to transfer some of the burden of responsibility for social housing provision from public housing authorities to community housing associations, through stock transfer or the provision of substantial government funding, should be underpinned by guarantees for tenants (both existing public housing tenants whose homes are transferred and new tenants coming into the system). These guarantees include affordable rents, secure tenure, protection against eviction except as a last resort, and a growth in supply. Finally, a larger role for the community housing sector should not be predicated on a declining role for public housing; community housing should instead be seen as a complementary part of a wider social housing system.

¹ This figure is calculated using data from the Productivity Commission's annual Report on Government Services. According to the 2010 report, there were 9331 households in Tasmania at 30 June 2009 paying less than market rent. The average weekly 'subsidy' (i.e. revenue foregone) for each of these households was \$79.46. This yields a total subsidy of \$37 million across the system (Steering Committee for the Review of Government Service Provision 2010, vol. 2, ch. 16A, tables 16A.1, 16A.11).

² KPMG's overall prediction was of a growth in the sector of 54,465 dwellings above the base case in five years. But the overwhelming majority of these were to come through the National Rental Affordability Scheme (NRAS); these properties charge market-linked rents and would not be affordable for people on low, fixed incomes. Social housing, with income-linked rents, accounted for just 1901 of the anticipated properties — and it needs to be noted that one of the assumptions used by KPMG in modelling even this amount of growth was an increase in rents to 30% of tenant income. A further risk associated with the reliance on NRAS properties to deliver social housing outcomes is that a substantial number of them can be expected to be sold into the private market after the 10 year incentive eligibility period ends, which means that over time, overall stock levels in the sector will fall markedly (FaHCSIA 2009, sec. 5.4).

Recommendation 2: That Tasmanian community housing associations be provided with an operating subsidy that allows them to cover their costs and deliver genuinely affordable rents to tenants.

Lead agency: Housing Innovations Unit — Department of Health and Human Services

Estimated cost: Uncosted

Rationale: If the State Government decides to move to a housing association model for the provision of some government-funded housing assistance, this model should not in any way reduce the conditions and protections that tenants enjoy under the current public housing system. To justify the investment, it should also deliver in those areas (such as housing quality or the provision of support services) that the public housing system, due to lack of funding, is unable to deliver.

The 'bottom line', for Anglicare, includes explicit guarantees of the following:

- rents that are set at levels that guarantee tenants are not living in hardship, with 'hardship' defined by tenants' actual incomes and living situations rather than by an arbitrary benchmark;
- sufficient supply of appropriate housing to guarantee access without unreasonable waiting times for all tenants on low and very low incomes and all tenants with high needs (that is, significant net growth in social housing supply);
- security of tenure, meaning that in the vast majority of circumstances, tenants will not be obliged to leave their homes unless they choose to do so;
- access to adequate support services, including long-term and ongoing support if necessary;
- eviction to be used only as an absolute last resort after all other avenues, including the provision of a reasonable period of intensive support, have been exhausted;
- appropriate housing, of good quality, with essential repairs completed in a timely manner, regular, timetabled maintenance to ensure quality is maintained and upgrades performed where appropriate to ensure accessibility and safety;
- direct Ministerial accountability for the outcomes delivered, including the outcomes for tenants;
- protocols to be in place between the housing association(s) and relevant government departments to ensure that the housing response is integrated with urban and regional development and the coordination and planning of transport services, community facilities, job creation initiatives, education policy, training programs and human services delivery, in order to maximise life opportunities for tenants.³

Anglicare's view, supported by the research evidence, is that delivering this bottom line is not possible using the subsidy provided by Commonwealth Rent Assistance alone, and that a further operating subsidy from governments will be required. Quantifying this operating subsidy in this submission is not possible, because many of the variables are unknown, including the likely incomes of the tenants, the rent-setting model to be used (which will influence the amount of Commonwealth Rent Assistance that will be available to each tenant) and the operating costs of the provider, which will include the costs of borrowing to fund further developments and thus depend on a range of factors within financial markets. Anglicare notes that, because the model is dependent on attracting private investment, the cost of the subsidy may be substantial — at a national level, KPMG estimates that a subsidy of \$199 million per annum will be required for

³ The rationales for each of these elements of the 'bottom line', including supporting references to the relevant research, are contained in Anglicare's submission to the Department of Families, Housing, Community Services and Indigenous Affairs on regulatory models for community housing (Anglicare Tasmania 2010b).

providers to achieve sustainability (FaHCSIA 2009, sec. 5.5), and this is assuming rents of 30% of income, which would force many tenants into unacceptable financial hardship.

1.4. Consumer participation

The Department of Health and Human Services has committed to a program of engagement with the people who use its services, their carers and their support networks (DHHS 2009). However, housing consumers have been provided with limited opportunities to have their voices heard.

For example, even though substantial reforms to housing policy and programs are under consideration by the Department and by the Government, including reforms to such fundamental issues as how much rent public tenants pay for their housing, who will be their landlord in the future, the future of public housing in broadacre estates and who will ultimately own Tasmania's \$1.8 billion public housing asset, public housing tenants (and the community more broadly) by and large are unaware that these issues are even on the table.

Because of our concern about the implications of a rent increase for the poorest public housing tenants, Anglicare recently circulated information about the proposed reforms to rental policy. The information was sent to those community organisations which might have clients who were living in public housing and it concerned Housing Tasmania's current rent setting system and the most likely reform to that system — a shift to a 25% of income flat rate — being proposed (Anglicare Tasmania 2010a). Despite working closely with public housing tenants, the organisations we contacted had no idea that the reforms were even under discussion, and neither did their clients. This is despite the fact that these organisations then told us that any rent increase would have a disastrous effect on their clients and on anyone coming into public housing in similar financial circumstances.

Recommendation 3: That the State Government fund a consultation process around public housing reform.

Lead agency: Housing Tasmania/Housing Innovations Unit — Department of Health and Human Services

Estimated cost: \$25,000 one-off, with recurrent funding required in future Budgets to maintain the process over time

Rationale: Although there are small-scale public housing tenants' groups in operation and Housing Tasmania conducts some local consultations with its tenants around operational issues, Tasmania, unlike other states, does not have a statewide tenants' association to take on responsibility for advocacy and representation in relation to systemic issues or structural changes. This makes it challenging to engage with the wider tenant population on complex issues. However, this should not be used as an excuse to neglect consultation with tenants. The Department, and the Government more broadly, can and should be doing more to engage with tenants. As the Department's own strategy on consumer engagement makes clear, engaging early in the decision-making process is critical (DHHS 2009, pp. 12, 15, 22). It has not occurred in the case of housing reform, and the discussions are already well-advanced, although at the time of writing Anglicare understands that no final decision has been made. Urgent action is critical to allow Tasmanians living in public housing or on the public housing waiting list to have their say in the process before any final decisions are made.

The methodology to be used for the consultation process needs to be developed in association with tenants, who are after all the best possible source of information about what consultation format would work best for them. However, the process needs to include the following elements to be successful and meaningful:

- the provision of good quality, in-depth information to participants (in appropriate formats and with adequate time to absorb the information) to enable them to become equal players in the discussion;
- support for individuals to participate — ranging from training through to very practical assistance with the cost of travel and accommodation; and
- time for people to engage, reflect and contribute — this may not fit with government timelines but it is essential for a genuinely inclusive, democratic process.

Anglicare stresses that the consultation process adopted in Tasmania must be designed to ensure that residents who choose to participate and thus to represent the other tenants must be supported so that they can be as effective advocates as possible for the interests of the wider tenant body. This means assisting them to develop understanding of the issues and assisting them with the work of communicating and consulting with the wider body of tenants. The resources provided need to be realistic given the scale of the task involved.

As a first step for Housing Tasmania, an initial consultation process allowing tenants to engage with an issue (the current reform agenda) that is immediate and relevant would serve as a platform upon which to build a more permanent consultative structure. Anglicare estimates that \$25,000 would initially be required if an external consultant with expertise in consulting with disadvantaged groups was contracted to undertake the work. This costing is to establish an embryonic structure that could grow with time. Additional and ongoing funding would be needed above this initial allocation to support the process of growth.

Anglicare also notes that public housing tenants are not the only group of housing consumers that need to be engaged in policy development. Clients of homelessness services and private renters are also generally disempowered and should have their voices heard by policy makers, particularly during the implementation of the Tasmanian Homelessness Plan and the current review of the *Residential Tenancy Act 1997* respectively. However, given the substantial nature and profound consequences of the current reforms to social housing, Anglicare sees the development of consultation mechanisms in this area as the priority for State Government action.

1.5. The private rental market

As noted above, a review of Tasmania's residential tenancy legislation, the Residential Tenancy Act, is currently underway. Anglicare has provided a written submission to the review (Anglicare Tasmania 2010c) and was an active participant in the recent conference that was held by Consumer Affairs and Fair Trading to further the consultation process. In our written submission and in discussions at the conference, we expressed considerable concern about the failure by many private landlords to comply with the existing provisions of the Act. While there are also a range of improvements that can be made to the legislation (which are further discussed in Anglicare's submission to the review), this issue of failure by landlords to comply with their obligations is something that can be tackled now, rather than waiting for the outcomes of what appears likely to be a lengthy reform process.

Recommendation 4: That \$200,000 in additional funding be allocated to Consumer Affairs and Fair Trading to allow it to undertake greater and more proactive enforcement activity.

Lead agency: Consumer Affairs and Fair Trading – Department of Justice

Estimated cost: \$200,000 per annum, recurrent, plus indexation

Rationale: Anglicare’s submission to the Residential Tenancy Act review raised serious concerns about the extent of non-compliance by landlords with basic provisions in the legislation. Anglicare workers reported a number of widespread problems, including

- tenants being evicted because the landlord intends to renovate or sell the property (permitted under the Act), only to see the same property advertised as available to rent without renovations having been performed or any sale taking place;
- refusal by landlords to conduct repairs and maintenance, both general and urgent, within required timeframes or at all;
- refusal to provide a signed condition report when taking a bond;
- coming onto the premises without giving the tenant appropriate notice; and
- the collection of bonds for rooms in share houses which actually fall under the boarding house provisions of the Act (making the collection of a bond unlawful).

Anglicare workers supporting people living in or trying to access the private rental market say that in their experience, tenants and landlords do not have equal power in the making of residential tenancy agreements. Many tenants live in fear of eviction if they say the wrong thing, which leads on many occasions to tenants asking workers not to speak to their landlords, even when the landlord has clearly broken the law, and instead seeking somewhere else to live in preference to asserting their rights. Firstly, it is not reasonable that a tenant should feel compelled to leave their home when it is the landlord who is in the wrong. Secondly, finding ‘somewhere else to live’ in Tasmania’s tight rental market is by no means easy, and often means putting up with substandard housing, paying unaffordable rent, living far from transport and services or a period of homelessness.

Some landlords are unaware of the provisions of the Act and do not know that their behaviour constitutes a breach of the law. Others, both private landlords and real estate agents, are well aware that they are breaching the requirements of the legislation but continue to do so regardless. Anglicare has frequently raised concerns about deficiencies in the enforcement regime with Consumer Affairs and Fair Trading. We have been advised that the central issues are the lack of resources available to fund enforcement work and the lack of complaints from tenants. This means Consumer Affairs and Fair Trading is restricted to undertaking only reactive enforcement, in response to complaints from tenants. In the current market, however, many tenants choose not to complain. Part of the problem is the lack of alternatives to court proceedings within the existing dispute resolution framework (something we hope to see resolved through legislative reform as part of the current review). The issue of a lack of resources, however, is one that can easily be addressed by an increased budget allocation to Consumer Affairs and Fair Trading.

Increased funding would allow Consumer Affairs and Fair Trading to adopt a more proactive approach with regards to enforcement. The current approach is not proactive, but is complaint-oriented. As an approach to enforcing regulations on substandard housing this an ineffective approach for three reasons: they tend to focus on alleged violations, enforcement is random as many violations are not reported, and uneven enforcement creates a sense of injustice in some owners and reduces the likelihood they will comply voluntarily (Bradbrook 1977). A possible approach for Tasmania would be a system of area-based inspections for older areas where housing

is likely to be substandard, with complaint-based inspection programs operating in other areas. This would promote proactive enforcement with a focus on universal inspection and investigation in areas where systemic problems have been identified, with the aim being to detect any violation, rather than one-off reactions to individual complaints.

In its submission to the review of the Act, Anglicare notes a number of strategies that could be used to build a better, more proactive enforcement system. However, the issue of resources is a critical one, and needs to be addressed to provide Consumer Affairs and Fair Trading with the capacity and flexibility to embrace a new way of working. An initial allocation of \$200,000 per annum is recommended.

1.6. Addressing homelessness

The State Government recently released a three year plan to tackle homelessness in Tasmania (DHHS 2010). The plan was based on consultation with the homelessness services sector and sits beneath the National Partnership on Homelessness agreed between the Australian and Tasmanian Governments. It also fits within a broader context, including the Australian Government's White Paper on homelessness (Australian Government 2008) and the Tasmanian Government's March 2008 commitment to halve the number of people sleeping rough in the state by 2010 (Lennon 2008). The homelessness plan outlines a number of priority areas for action, including increasing the supply of appropriate, long-term housing available for people leaving homelessness services, ensuring support is provided at a level and duration appropriate to the needs of each client, improving the integration and coordination of support for homeless people and investing in workforce development. Anglicare was closely involved in the development of the plan and welcomed its release.

However in this submission, Anglicare is focussing on the needs of existing services, which are facing rising demand and constrained resources. While the development of new services and options over the next three years is welcome, it is important that existing services are adequately funded so that they can meet the needs of people who are homeless or at risk of homelessness now.

Recommendation 5: That the Tasmanian Government increase funding to Tasmanian specialist homelessness services to meet increased demand.

Estimated cost: Uncosted

Lead agency: Housing Tasmania — Department of Health and Human Services.

Rationale: Homelessness continues to be a significant social problem facing Tasmania. Both the number of people who were homeless in Tasmania and the rate of homelessness in the population (i.e. the number of homeless people per 10,000 population) increased between the 2001 and 2006 Censuses, and the rate of homelessness in Tasmania is higher than in New South Wales, Victoria and the ACT, and equal to that in South Australia (DHHS 2010, pp. 15-16).⁴ While the raw number

⁴ The figures cited here are taken from the Tasmanian homelessness plan, which took the figures from the most authoritative available source, the analysis of the Census data undertaken by Chamberlain and MacKenzie (2008). It is worth noting that Chamberlain and MacKenzie do not consider people living in caravan parks to be 'homeless' under their definition (2008, p. 16). Anglicare, however, does count people living in caravan parks as homeless because we are aware that in Tasmania, caravan parks are often used as a source of emergency accommodation for people who are homeless or as accommodation of last resort (Shelter Tasmania 2006, pp. 1-3). If people living in caravan parks are included in the count of homeless people in Tasmania, the number of homeless people increases

of homeless Tasmanians (2,507 people) appears small, this represents one in every 200 people in Tasmania, and nearly half (44.4%) are children — a much higher proportion than the national average (Chamberlain & MacKenzie 2008, pp. 6-7). Because of the disruption to school, work and social networks caused by homelessness, the problem imposes a significant and long-term cost on the community and the economy.

Some groups of homeless people face particular difficulties in obtaining assistance because of a shortage of services to meet their needs. This includes young people (aged under 16), families, men with children and single older men (DHHS 2010, p. 17). While there are services that target some of these groups — Anglicare operates a crisis shelter for homeless boys and young men in Hobart, for example — these services are simply unable to respond to all of those who need assistance, which can mean that people are turned away. The number of clients supported by specialist homelessness services has been steadily rising over the last decade (AIHW 2010, p. 44).

The Tasmanian homelessness plan notes the Tasmanian Government's commitment to halving the number of Tasmanians sleeping rough (that is, in 'primary homelessness'), and its progress towards achieving that goal through the provision of more than 200 additional beds in a range of accommodation options by December 2010 (DHHS 2010, p. 13). However, as the homelessness plan also acknowledges, the majority of homeless people in Tasmania are not sleeping rough, but are instead staying with friends or family or in supported accommodation ('secondary homelessness') or in rooming houses ('tertiary homelessness') (DHHS 2010, p. 14). Nor is the experience of homelessness a static one, with many homeless people moving back and forth between categories as their circumstances change. Someone can be in secondary homelessness today, but sleeping rough tomorrow.

Anglicare believes that while the construction of new accommodation is very important, and looks forward to the improvements in service design and delivery that are anticipated in the homelessness plan and the new services that are currently being rolled out across the state, Tasmania must also keep a focus on existing services which are supporting people who are homeless or at risk now. These services are over-stretched and struggling to meet demand. It will take time for the reforms outlined in the homelessness plan to bed down and deliver results, so an immediate boost in funding for existing, proven services is necessary so that the problem does not get worse before it gets better.

Anglicare has not costed this recommendation. Considerable change has occurred in both funding arrangements and in the service environment since we called for an increase in funding for the then Supported Accommodation Assistance Program (SAAP) in 2008 (Anglicare Tasmania 2008, p. 24). However, all specialist homelessness services routinely collect data on the level of unmet need as part of their standard reporting requirements and quantifying the level of resources required to respond adequately to current demand should be a relatively easy task for funding bodies.

Recommendation 6: That the Tasmanian Government provides an additional \$154,000 for specialist homelessness services brokerage funding, and apply indexation in forward estimates to ensure the value of the funding is maintained over time.

from 2507 to 2669 and the rate of homelessness in the population increases from 53 to 56 people per 10,000 population (see Chamberlain & MacKenzie 2008, p. 45).

Estimated cost: \$154,000 per annum, recurrent, plus indexation (on total brokerage funding of \$554,000)

Lead agency: Housing Tasmania — Department of Health and Human Services

Rationale: As part of the funding provided to specialist homelessness services, the Department of Health and Human Services provides \$400,000 per annum for 'brokerage'. According to the Tasmanian implementation plan for the National Partnership on Homelessness, these brokerage funds are seen as an 'integral part' of the reforms to Tasmania's homelessness service system that occurred during the fourth Supported Accommodation Assistance Program (SAAP IV) funding period. The funds are provided to purchase immediate accommodation on behalf of homelessness clients in the private market (usually in caravan parks, pub tops, hotels and motels), to purchase specialist support, such as counselling, if required, and to purchase on a one-off basis items, such as whitegoods, that allow clients to establish long-term independent accommodation.

Over the nine years since the brokerage model was established, the annual funding allocation has not increased from its original level of \$400,000. However, the costs of individual brokerage items, such as accommodation, white goods, rental costs, electricity costs, food, cleaning, maintenance and counselling, have all increased. The end result is that the real amount of assistance available to clients has been steadily eroded over time. Assuming standard indexation of 3.3%, and applying this indexation rate each year since the \$400,000 was originally provided (2001-02), Anglicare estimates that an additional \$154,000 would be required in this Budget to retrospectively account for indexation. The new total funding allocation (\$554,000) would then need to be made subject to standard annual indexation arrangements in future years.

3. Making electricity affordable

3.1. Tasmania Together

The Tasmania *Together* benchmark most relevant to electricity prices is Indicator 1.1.1 (under Goal 1), the proportion of income taken up a 'basket' of essential items, including electricity. Although performance against this indicator has varied, the trend since 2001 is of a significant increase in the proportion of income taken up by the selected basket of items, and it is unlikely that the target for 2010, or even 2015, will be achieved.

Electricity prices have risen by nearly 30% since January 2008, and a further increase of nearly 9% will occur in December 2010, with regular and significant increases likely into the foreseeable future. Out of concern about the effect these rising prices were having on some of our most vulnerable clients, Anglicare joined together with the Tasmanian Council of Social Service (TasCOSS) to develop a joint action plan on electricity affordability. This action plan was published as *Making electricity affordable: a four point action plan* (Anglicare Tasmania & TasCOSS 2010) and was publically released on 18 November. This section of Anglicare's budget submission is based on this joint work.

3.2. Affordable prices

Aurora currently sells electricity to residential customers on regulated tariffs using a flat tariff structure (that is, electricity is sold at a set price per kilowatt hour, regardless of levels of consumption), with a relatively high fixed charge compared to other states. This means that customers have little incentive to reduce their usage — or, to put it another way, are unable to benefit from keeping their consumption low, which low-income customers tend to do due to affordability constraints — since when they do reduce their consumption, the pay-off is not large because they are only able to affect a small part of their bill.

Recommendation 7: That the Tasmanian Government work with Aurora Energy to implement an inclining block tariff for all residential customers, with the first block in the tariff treated as a 'lifeline' block, priced affordably and quarantined from further price increases (apart from inflation).

Lead agency: Shareholder Policy and Markets Branch — Department of Treasury and Finance

Estimated cost: Uncosted

Rationale: Inclining block tariffs are usually considered to be fairer for people on very low incomes, because most people on low incomes use lower than average amounts of electricity. An inclining block tariff rewards them for this by charging them less. Such a tariff also supports demand reduction strategies and has environmental benefits, because it sends a price signal encouraging people to reduce the amount of electricity they use, reducing the demand on electricity infrastructure and, where electricity is from non-renewable sources, reducing carbon emissions.

Anglicare recommends that Aurora switch to an inclining block tariff for all its residential customers. The first block of this tariff would cover quite a small amount of usage, which would be priced at a very low rate (at or even below cost) and excluded from any future price rises beyond general CPI. Electricity consumption above the lifeline amount would then be priced

using inclining blocks. The amount of electricity included in the first, affordable block, which Anglicare has termed a 'lifeline' block, would be the amount needed each day to run an average fridge, prepare a hot meal, heat and light a single room (assuming average energy efficiency) and provide hot water for bathing for an average household. The new tariff would also have very low fixed charges to provide a further incentive/reward for people to reduce their usage.

The proposal will deliver a number of important advantages, including improved access to electricity for all Tasmanians, but particularly for low income earners; protection from unexpected price increases (by linking the lifeline block of the tariff to general inflation only); environmental benefits in the form of reduced carbon emissions from the now-significant amount of electricity Tasmania purchases through Basslink; and constraints on long-term demand, and thus infrastructure needs, due to the incentive to consume less electricity.

Offering a genuinely affordable 'lifeline' block in the tariff might require a Government subsidy. This subsidy is not costed because establishing it would involve complex modelling work beyond Anglicare's capacity. It may of course not be necessary as the tariff may be able to be restructured without affecting overall revenue to Aurora. However, if a subsidy is required, the long-term gains from delivering affordable electricity for households would favourably affect other areas of the State Budget — people who have sufficient access to electricity for heating have better physical health, for example, which means less expenditure would be required on healthcare.

This proposal is not original to Anglicare — it is based on a proposal by Dufty (2007) for a 'lifeline' tariff to address the likely increases in electricity prices arising from a price on carbon. It is also similar in spirit to the recent proposal from the Communications, Electrical and Plumbing Union (2010) for a 'base household load' price quarantined from further increases beyond inflation. Clearly there is support for such a proposal from within the policy community and among workers in the industry itself, and if the lifeline tariff was implemented, Tasmania would have the opportunity to lead the way in adopting proactive pricing policies to enhance affordability and mitigate the effects of climate change.

3.3. Concessions that target those in need

The Tasmanian Government currently provides Tasmanian electricity customers who are on low incomes with a concession on their electricity bills of 92.55 cents per day or \$338.04 per annum (slightly higher for Aurora Pay As You Go customers). This concession is higher than those provided in other states — although of course, Tasmania's colder climate and higher reliance on electricity for heating means that the concession *needs* to be higher in Tasmania. Even so, the system is clearly not working, with Tasmanians receiving the concession still falling into crisis due to their electricity bills and seeking emergency relief. Although indexation of the concession means that it does increase proportionally as the price increases, even this is not enough to ameliorate the growing burden electricity is putting on household budgets.

The existing concession rate is arbitrary, based on an historical rate determined in 1994, and it is not set according to what it would take to make electricity affordable. It is also a flat rate, which means that different households get exactly the same amount, regardless of their need for electricity.

Recommendation 8: That the Tasmanian Government abolish the existing electricity concession and replace it with a two part concession — a flat rate concession applied to the fixed charge and a capped percentage rate concession applied to consumption above the ‘lifeline’ block (see Recommendation 5).

Lead agency: Shareholder Policy and Markets Branch — Department of Treasury and Finance
Estimated cost: \$25 million (approx.) per annum, recurrent, plus indexation — as for existing concession

Rationale: While it is important that households are encouraged to keep their electricity consumption at sensible levels, electricity is an essential service and some use of electricity is not discretionary. Some Tasmanians need to use more electricity than others because of their circumstances. This might be because their house is uninsulated, because they have inefficient appliances but cannot afford to replace them, because there are a lot of people living in their households or because they have someone in their household with a disability who needs to keep warm 24 hours a day.

Anglicare’s recommendation responds to the fact that these households receive, under the current system, exactly the same amount as a household which does not need to use extra and may in fact be able to curb consumption without compromising quality of life because they live in a small, well-insulated property (for example). The recommendation is for a two part concession — a flat concession on the fixed charge (indexed against price increases) and a capped, percentage concession on consumption (with the cap also indexed against price increases). The new concession would be combined with the lifeline tariff proposal outlined above, and the consumption concession would not apply to the ‘lifeline’ block in the tariff because this would already be priced affordably.

Indicative modelling of this proposal conducted for Anglicare and TasCOSS’s joint action plan on electricity (Anglicare & TasCOSS 2010) indicates that the cost to the Tasmanian Government of the proposed concession will be about the same (approximately \$25 million per annum) as the current concession. The proposed concession will respond more effectively to the needs of Tasmanian households, particularly those households which need to use more electricity due to their circumstances. It would, however, still preserve the inclining block tariff structure that encourages households to reduce their usage where they can, and caps the amount of assistance each household could receive to ensure budget certainty.

3.4. Making houses energy efficient

The quality of Tasmania’s housing stock is poor. Tasmania has:

- the oldest housing stock in Australia — 23% of homes were constructed before 1955 (ABS 2000);
- the highest proportion of timber houses in Australia (27% compared with the national average of 13%); and
- poor insulation — around a quarter of homes are still uninsulated, despite Tasmania’s climate being the coolest in Australia (ABS 2008).

These problems with the housing stock are relevant to discussions about electricity prices because Tasmanians are more likely than people in other parts of the country to use electricity for heating. For example:

- around 85% of Tasmanian homes use heaters for more than three months of the year, well ahead of other states;
- 65% of Tasmanian households use electricity for space heating, which is twice the national average;
- 79% of Tasmanian households use electricity to heat hot water (compared to the national average of 46%); and
- Tasmanian households are four times more likely than households in other states to use peak electricity for hot water heating (ABS 2008).

Contrary to popular belief, Tasmania's higher need for electricity for heating is not offset by the requirement for cooling in other parts of Australia. Tasmanian households have a higher requirement for heating places such as Melbourne, Sydney or Darwin have for cooling or for heating and cooling combined (Szokoloy 1988).

Yet there are few programs in Tasmania to improve energy efficiency in existing houses and while Tasmanians are eligible for national programs, such as the subsidy for solar panel installation or the insulation rebate, Tasmania's climate means that these programs have less impact than in other states. For example, solar panels are less effective in colder climates and even though Tasmanian insulation requirements are higher, the insulation rebate was paid at a flat rate across the country. Tasmanians who are renting, either privately or through Housing Tasmania, have even less access to support, even though low income households are more likely to live in these tenures.

Recommendation 9: That \$4.02 million be allocated to fund a statewide energy efficiency retrofitting and support program targeting low income households in home ownership, private rental and public housing.

Lead agency: Tasmanian Climate Change Office — Department of Premier and Cabinet

Estimated cost: \$4.02 million, one-off

Rationale: This recommendation is based upon a proposal developed by Anglicare Tasmania, Sustainable Living Tasmania and the Tasmanian Climate Change Office, and it is also endorsed by TasCOSS. It is supported by a fully-developed business plan, on which the costing of \$4.02 million is based. The costing includes retrofitting materials and the cost of an evaluation to measure the program's effectiveness.

The program has two components:

- An assessment of the house, in consultation with the occupants, which would decide the appropriate measures needed for that particular property, followed by the purchase, supply and installation where appropriate of low-cost retrofitting materials.
- Mentoring and support for the people living in the house so that they can adjust their behaviour in order to save energy. This mentoring and support would be designed to meet the needs of the households, which could include the provision of visual (rather than written) information for people who have difficulties with literacy.

The retrofitting component of the program would concentrate on less visible, less costly changes over highly visible, high-cost strategies like the installation of solar panels. Low-cost measures can be just as effective in reducing energy use and their lower relative cost per household means that the program can reach more people. The particular changes chosen for each house would depend on the needs of the occupants and the characteristics of the property. Options include:

- reducing hot water heating costs by ensuring hot water service temperatures are set at 60°C, installing insulation wraps around external hot water systems, insulating outlet pipes, and installing water-efficient fittings to reduce hot water use (e.g. flow restrictors, water-efficient showerheads or tap aerators);
- reducing heating costs by identifying and blocking gaps through which heat is escaping (e.g. by blocking draughts with tape around windows and doors and door 'sausages'), installing simple pelmets and (where need is great) providing curtains;
- reducing lighting costs by replacing incandescent globes and 240 volt halogen globes with CFL/LED globes in high usage fittings; and
- reducing general power costs due to appliances being in 'standby' mode by installing standby-deactivation devices or foot-operated power boards to help people change their behaviour.

The physical changes would be accompanied by support for the occupants to better understand their electricity usage and, where possible, change their behaviour to reduce the amount of energy they use. This component is essential because the experience of people working in this area is that almost everyone needs support to understand these issues — even highly-motivated people living in very energy efficient demonstration houses need to be 'taught' how to live in the house to obtain the maximum benefit.

Program participants would be identified through community service organisations and relevant government services (such as Housing Tasmania). An assessment process would ensure that households most in need were prioritised. The program would target low income earners in home ownership, people living in the private rental market, public housing tenants and people living in transitional accommodation provided by crisis and homelessness services.

3.5. Emergency relief for households in crisis now

Previously in Tasmania, emergency relief services were funded entirely by the Australian Government. However, in 2009 the Tasmanian Government provided a one-off allocation of \$1 million to supplement federal funding to Tasmanian emergency relief services, in recognition of the effect of the global financial crisis was likely to have on Tasmanian households. This funding is now almost exhausted, at a time when services are reporting increased demand, particularly around electricity costs.

While Aurora does provide, at its discretion, funding to emergency relief services to assist people in financial crisis due to electricity costs (\$270,000 was provided in 2008-09, and the funding is indexed against increases in electricity prices), this funding is limited and by necessity heavily rationed. Emergency relief services are reporting that bills of \$1000 a quarter are no longer uncommon, yet often a service can only provide a maximum of \$100 in assistance, which has little impact.

Recommendation 10: That annual funding of \$1 million be allocated to Tasmanian emergency relief services for general disbursement to clients in financial crisis.

Lead agency: Social Inclusion Unit — Department of Premier and Cabinet

Estimated cost: \$1 million per annum, recurrent, plus indexation

Rationale: The funding Aurora provides to emergency relief services, though extremely valuable, must be spent on paying off electricity bills. The \$1 million which the Tasmanian Government

provided during the global financial crisis was for general emergency relief — that is, services could use it to provide food, clothing, petrol to get to medical appointments, assistance with the cost of prescriptions and help with the cost of utilities such as electricity, water and telephones. This flexibility is important because different households have different ways of coping with rising prices in one area of their budget. Anglicare’s recent survey of emergency relief clients found that households with children were less likely than people without children to go without meals or heating due to a shortage of money (Flanagan, K 2010, p. 53), and the survey report suggested that this may be because parents prioritise feeding their children and keeping them warm over other demands on their budget. A person might choose to pay their electricity bill and go to emergency relief for assistance for petrol to get to a doctor’s appointment, but the crisis itself might be caused by the size of the electricity bill.

The provision of \$1 million in general funding will meet the needs of all households, including those households which choose different coping strategies. It will complement the more targeted funding provided by Aurora and will directly reach those people facing the greatest levels of hardship. Consideration should be given to continuing this commitment of \$1 million annually.

4. Access to the Public Trustee

4.1. Tasmania Together

There is no specific Tasmania *Together* benchmark relating to access to the Public Trustee for 'represented persons', partly because the number of these people within the overall community is very small. However, they are some of the most disadvantaged and marginalised members of the community, and there are many elements of Tasmania *Together* that are expressive of a desire for a more socially inclusive community, including Goal 1, 'a reasonable lifestyle and standard of living for all Tasmanians' and Goal 5, 'vibrant, inclusive and growing communities where people feel valued and connected'.

4.2. Fees and charges imposed by the Public Trustee

Under the Tasmanian *Guardianship and Administration Act 1995*, certain people can be declared to lack the capacity to make reasonable judgements about personal financial or property matters. To be declared to lack capacity in this way, a person must have a high degree of incapacity, such as a serious mental illness, a severe intellectual disability or a major cognitive impairment caused by dementia. They become 'represented persons' and their estates, trusts and financial affairs are administered by the Public Trustee, a government business enterprise, through a \$1.17 million community service obligation funded by the Tasmanian Government. While around 51% of the matters under administration by the Public Trustee are non-commercial matters (community service obligations), eligibility for the CSO-funded administration service is means-tested, and many of the people involved are on extremely low incomes — the base rate of the Disability Support Pension for a single adult is currently \$716.10 a fortnight (\$18,618 per annum). The Public Trustee is funded for this community service obligation on a net avoidable cost basis. This is calculated on estimating the proportion of the Trustee's operational costs incurred in providing the CSO administration and deducting the fees and charges generated by this. This funding model, therefore, is predicated on the users of the service part paying for its cost. For someone on the Disability Support Pension, these fees amount to around 9% of their income. Anglicare wishes to see all fees and charges associated with the financial administration service for represented persons with assets of less than \$10,000 be abolished. In 2008-09, The Public Trustee achieved a net operating profit after tax of \$690,284 and paid a \$455,000 dividend to Government (in addition to the taxation it paid on its profits, a total of around \$700,000 revenue) (Government Businesses Scrutiny Committee, 2009). In 2007 it was estimated that an additional \$155,000 was required to cover the fees charged to represented persons with assets of less than \$10,000 (Hansard 2007). This sum could also be raised through a reduction in the dividend paid by the Public Trustee to Government.

Recommendation 11: That the Tasmanian Government allocate \$155,000 per annum in additional funding to the Public Trustee, via its community service obligation agreement, to abolish all fees and charges for represented persons on low incomes.

Lead agency: Shareholder Policy and Markets Branch — Department of Treasury and Finance
Estimated cost: \$155,000 per annum, recurrent, plus indexation

Rationale: Anglicare research has previously identified that the fees and charges imposed by the Public Trustee pose a considerable barrier to low income earners who might benefit from administration of their financial affairs. Effectively, while administration of their affairs will assist

people in managing their income so that they can budget for essential items like food, rent and electricity, going under administration reduces their income to the point where living costs become unaffordable (Cameron & Flanagan, J 2004, pp. 76-7). For some clients, the fees jeopardise their ability to pay for their tenancy in supported housing services. The evidence for this assertion are the cases brought to Anglicare's attention by case managers working with these clients. It is worth noting that for represented persons, using the Public Trustee is not a choice - these costs are compulsorily imposed through their being placed under administration.

Because of these concerns, Anglicare has long argued for an increase in the community service obligation funding provided to the Public Trustee in order to reduce the financial burden on clients of the service. Government has recognised the need for this, with a number of lump-sum charges abolished for low income earners in 2005 (other fees and charges remain). The Public Trustee was in 2008 provided with additional community service obligation funding to support it to absorb these lump-sum charges. This agreement expires in June 2011, and will need to be renegotiated before that date. This renegotiation provides an opportunity to significantly increase this funding to not only allow the Public Trustee to continue to waive the lump-sum charges for what is an increasing number of clients, but also to allow the Public Trustee to abolish all fees and charges for this client group.

Our recommendation is made in the context of the extreme poverty which many people with severe mental illness or profound disabilities experience – poverty that was documented in two significant Anglicare research reports, *Thin ice* (Cameron & Flanagan, J 2004) and *My life as a budget item* (Hinton 2006). This poverty means that the imposition of any fees or charges places people at even greater risk of financial crisis, which, in the case of people with mental illnesses, can exacerbate the symptoms of their illness, leading to expensive hospitalisation.

Abolition of all fees and charges would bring Tasmania into step with practices in most other states and territories. A review in October and November this year by Anglicare of charging practices by equivalent services throughout the rest of the country, summarised in the table below, found that most other jurisdictions charged only minimal fees, with some charging less than 1% of a person's income (Queensland and New South Wales) and others (the Northern Territory and Western Australia) charging no fee at all. Of the two jurisdictions charging fees above 1% of income (Victoria and South Australia) it was reported that there was discretionary power to waive these for the most disadvantaged customers. Tasmania's high fees stand out in this national comparison.

Table 1.**Comparison of charging practices by Public Trustees and equivalent agencies around Australia**

Agency (and jurisdiction)	Amount charged per annum	Cost as a percentage of income (for a single Disability Support Pensioner receiving the base rate of the pension plus the pension supplement, and the client has no assets or other sources of income)
The Public Trustee (Western Australia)	NIL	0
Office of the Public Guardian (NT)	NIL	0
The Public Trustee (Queensland)	\$175	less than 1%
The NSW Trustee and Guardian (NSW)	\$13 (calculated where a client has savings of \$500)	less than 1%
The Public Trustee (ACT)	\$465.45 (excluding sundries)	2.5%
The State Trustee (Victoria)	up to \$614.40 (often waived where pensioners have no assets or other income)	0 to 3.3%
The Public Trustee (South Australia)	up to \$1024 (often waived where people are suffering hardship, have no assets and 'low value' income)	0 to 5.5%
The Public Trustee (Tasmania)	Up to \$1620 ⁵	9%

5. Conclusion

Once again, Anglicare welcomes the opportunity to provide input into the Tasmanian Budget development process. The development of any Budget where resources are limited is about prioritising what is most important. This year, Anglicare calls on the Tasmanian Government to prioritise three groups of people in particular: Tasmanians in need of safe, secure, affordable, appropriate housing, Tasmanians affected by rising electricity prices, and those vulnerable and disadvantaged Tasmanians whose financial affairs are administered by the Public Trustee. These groups need more Tasmanian Government support, and addressing their needs through the Tasmanian Budget is an appropriate place to start.

⁵ Figures provided by the Public Trustee in 2006 have been adjusted to compensate for increases in the pension.

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