

People With Disabilities (WA) Inc.
individual & systemic advocacy



Submission

People with Disabilities WA provides this submission to the Department of Mines, Industry Regulation and Safety (Consumer Protection Division) in response to the Consultation Regulatory Impact Statement (CRIS) covering proposed reforms to tenancy legislation in December 2019.

People With Disabilities WA (PWdWA)

PWdWA is the peak disability consumer organisation representing the rights, needs, and equity of all Western Australians with a physical, intellectual, neurological, psychosocial, or sensory disability via individual and systemic advocacy.

PWdWA is run by and for people with disabilities and aims to advocate for the rights and, empower the voices of all people with disabilities in Western Australia.

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Contents

Executive Summary	0
Summary of recommendations	4
1 Introduction	7
2 Security of tenure.....	10
2.1 Length of tenancy - fixed term versus periodic leases	10
2.2 Notice Periods.....	12
3 Reasons for Termination	13
3.1 No grounds termination.....	13
3.2 Terminations on grounds of eligibility	13
3.3 Termination because of sale of premise	13
3.4 Mortgagee repossession.....	14
3.5 Termination by tenant	14
4 Affordability.....	15
4.1 Financial security	15
4.2 Frequency of rent increases.....	15
4.3 High pressure rent zones	16
4.4 Other ways to address rent increases.....	17
5 Appropriateness.....	18
5.1 Minimum standards.....	18
5.2 Modifications	19
5.3 Pets.....	20
5.4 Maintenance and repairs.....	20
6 Leasing information, advocacy and support	21
6.1 Lessor Information disclosure	21
6.2 Information provided	22
6.3 Additional information and inclusions in leases	22
7 Easy access to resolving disputes	24
7.1 Disposal of security bonds	24
7.2 Resolving other disputes.....	24
8 Boarders and lodging.....	25
9 Other Issues	26
Attachment 1 Consultation Issues.....	29

Executive Summary

People with Disabilities WA (PWdWA) has ensured the experiences and perspectives of the diverse range of people with disabilities are represented in this submission addressing potential amendments to the Tenancy Act 1987 (WA). The Department of Mines, Industry Regulation and Safety (Consumer Protection Division) released the Consultation Regulatory Impact Statement (CRIS) covering proposed reforms to tenancy legislation in December 2019.

PWdWA has provided a comprehensive response to the issues of most concern for people with disabilities and shorter responses to the balance of issues raised for comment, under Other Issues. No comments have been made about the cost implications of any of the options as PWdWA does not have appropriate economic or financial expertise to do so.

The focus is on representing the experiences of people with disability in accessing rental housing in Western Australia, identifying the opportunities for reform and advocating for systemic change across the community to address barriers identified through our consultation. The consultation included a questionnaire available through Survey Monkey and direct mail, a focus group, invitations to disability organisations to make comment and face to face interviews. A broad range of views has been captured and these views guide the responses in this submission.

Two themes underpin the responses:

- People with disabilities are not one group but many diverse groups and individuals, the barriers that impact on one person may not impact another. The aim of this submission is to identify which options maximise opportunities while avoiding restrictions that are embedded in legislation and create new barriers for some people with disabilities.
- Facilitative strategies to support people with disabilities will benefit the wider population who, at different life stages, will experience health or mobility issues, or, have family members who require specific supports to navigate rules and regulations. It is proposed that the Department of Commerce use this opportunity to recommend policy, program and regulatory change that:
 - Promotes access to mediation and advocacy that works like an accommodation broker for people with disabilities, in particular for people experiencing multiple barriers to achieving a home.
 - Promotes an increase in the amount of public housing that is available.
 - Increases the amount of gold standard accessible housing available in the community.
 - Increases options for home ownership including through shared ownership

This submission strongly advocates for tenancy legislation which increases security of tenure for people with disabilities and enables people with disabilities, who cannot afford to buy their own home, to have their right to a home protected in legislation. At the same time, there needs to be caution applied to estimating how well legislation change can drive outcomes, when these outcomes are to be delivered through private landlords, in particular, for people with disabilities.

Priority issues

The priority issues for people with disabilities raised through the CRIS are those that impact on security of tenure, access to information, advocacy support and problem solving.

Security of tenure is affected by:

- Length of tenancy and the type of lease
- Termination options, the potential for termination of a lease, degree of certainty that the lease can continue and having adequate time to gain a new tenancy (notice periods) when a tenancy is to cease
- Ongoing affordability of rentals including consideration of high pressure rental areas and new developments
- Availability of accessible accommodation in accessible locations
- The ability to modify the rental in response to needs and changing needs for people with disabilities as well as for people in their senior years

These are issues dealt with in section 2, 4, 6 of the CRIS.

Access to information, advocacy support and problem solving are most affected by:

- Information being provided in an accessible format, especially on rights and responsibilities, in plain language and available in multiple formats
- An emphasis on safety of vulnerable people giving consideration to what landlords must disclose and inclusions in a lease agreement
- Effective dispute resolution so that issues can be resolved quickly and effectively
- Advocacy and mediation support including brokerage for tenants to find, secure and retain the most appropriate accommodation
- Support and brokerage for private landlords to create the optimal opportunity to overcome barriers to renting for people with disabilities

These are issues dealt with in sections 3,5,7 and 8 of the CRIS.

The final recommendations put forward in our submission takes into account the options in each of these sections and how one option may have impacts on the efficacy of other options.

Summary of recommendations

Each of the CRIS issues have a recommended response which takes into account the experiences of people with disabilities. They are summarised in the table below.

Additional recommendations are provided as a result of the consultation.

1. The Department of Commerce take the information from this submission to:
 - 1.1. sponsor adequate government housing assistance for the most vulnerable renters, including advocacy support that works like an accommodation broker for people with disability
 - 1.2. promotes an increase in the amount of public housing that is available,
 - 1.3. advocates for and supports initiatives that assist people with disabilities to become home owners
 - 1.4. promotes strategies that will increase the availability of gold standard accessible housing in the community
 - 1.5. advocate for adjustments to Commonwealth Rent Assistance to keep pace with market trends.
2. The priority for any additional expenditure should be an effective mediation and support service and that if options that are considered require additional funding, that option becomes a lesser priority to the mediation service.
3. There is an ongoing need for advocacy, education and support for people with disabilities and landlords to achieve good results from tenancies
 - 3.1. a plain English version of a lease and education material in multiple formats is developed to explain the rights, responsibilities and supports available to tenants and landlords
 - 3.2. guidelines for creating leases with people with disabilities that assist with clarifying any unique circumstances and arrangements are provided
4. People with disability need to be included and understood as a diverse range of people experiencing very different circumstances, barriers and challenges
 - 4.1. PWdWA are consulted on all issues that are subject to further development and consultation
 - 4.2. People with disabilities are given specific consideration in modifying the Tenancy Act including the issues and recommendations outlined in the different sections of this submission
 - 4.3. Any amendments are *underpinned by principles of inclusion and inclusive practice in that people who are vulnerable for whatever reason should be*

provided with appropriate supports including education, in the process of and post the moving into one's own home¹.

Summary of responses to the CRIS issues

Relevant CRIS Section	Recommended Response
2.1 No grounds termination	Support Option C
2.2 Fixed Term tenancy agreements	Support Option D and Option E
3.1 Regulating the tenancy application process	Support Proposal
3.2 Lessor disclosure	Support Option B - with addition of <i>including information that is pertinent to the safety of a vulnerable person.</i>
4.1 Option fees	Support proposal
4.2 Amount of security bond	Support proposal
4.3 Bond guarantees and alternative bond products	Support proposal
4.4 Frequency of rent increases	Support Option C
4.5 High pressure rent zones	Support Option B
4.6 Charges for utilities	Support Option A
4.7 Rates and other charges	Support proposal
5.1 Minimum standards	Support Option B
5.2 Modifications to the premises	Support Option B
5.3 Pets in rental premises	Support proposal
5.4 Ongoing maintenance and repairs	Neither Option A or B is supported. Explore other options including achieving outcomes through a mediation service.
5.5 Drug testing of the premises	Support proposal
5.6 Swimming pool fence certification	Support proposal
5.7 Tenant and lessor rights and responsibilities	Support proposal - with simpler and different formats available

¹ Consultation Report on the results from consultation with stakeholders to identify the experiences and the barriers when seeking rental accommodation that is secure, affordable and accessible. PWDWA, June 2020

6.1 Eligibility related grounds of termination	Support proposal – with addition <i>except in situations where the eligibility criteria is failed by the carer or companion of a person with a disability.</i>
6.2 Sale of the rental premises	Support Option B
6.3 Mortgagee repossession of the rental premises	Support proposal
6.4 Termination of the tenancy agreement by the tenant	Support Option B
7.1 Disposal of security bonds	Support proposal
7.2 Resolving other disputes	Support Option C, maybe D if it does not divert funding away from mediation service
8 Boarding and lodging	Support proposal
9 Modifying the RTA in certain circumstances	Requires specific consideration of people with disabilities
10.1 Knowledge of the law	Support Option B
10.2 Register of lessors	Neither option is supported, prefer funding to be allocated to mediation service
10.3 Code of practice	Support whichever is most cost effective
11.1 Disposal of abandoned goods	Support proposal
11.2 Rights of occupants in shared housing arrangements: 11.2.1 Sub-tenants	Support proposal
11.2.2 Co-tenants	Support proposal

1 Introduction

This submission provides the experiences and perspectives of the diverse range of people with disability and consideration of the impact of related policy and legislation on the rights of people with disabilities in tenancy situations. The intention of the submission is to recommend how the options put forward in the CRIS consultation paper can best support people with disabilities to enjoy security and the sense of having a home when renting.

People with disabilities are more likely to be renting and on lower incomes which significantly affects their housing options. Approximately three quarters of the respondents to the PWdWA survey were renting (private, public, boarding or shared house), while one quarter were homeowners and one respondent was living with a parent.

The importance of a sense of place and a sense of home should not be underestimated and especially for people with disabilities. Multiple factors have a significant impact on housing outcomes for people with disabilities including:

- accessibility of housing
- affordability
- appropriateness
- security of tenure
- location

Together, these factors create the experience of having a home.

The release of the Consultation Regulatory Impact Statement is an important opportunity to provide the insights and experience of people with disabilities in tenancy situations and advice on how legislation can assist in overcoming barriers to experiencing a rental house as a home.

Attachment 1 provides the summary report of consultations - *Report on the results from consultation with stakeholders to identify the experiences and the barriers when seeking rental accommodation that is secure, affordable and accessible.*

Many people experience increasing disability as part of ageing and the benefit of changes made in response to this submission will benefit the ageing population that are tenants rather than home owners. There are multiple reasons and benefits for the Western Australian Residential Tenancies Act amendments to be considerate of the experiences of people with disability. As stated in the CRIS

Approximately 11 per cent of all WA residents in rental accommodation are over the age of sixty-five. This trend appears to be growing with estimates that by 2036 a quarter of all Australian retirees will be renters.

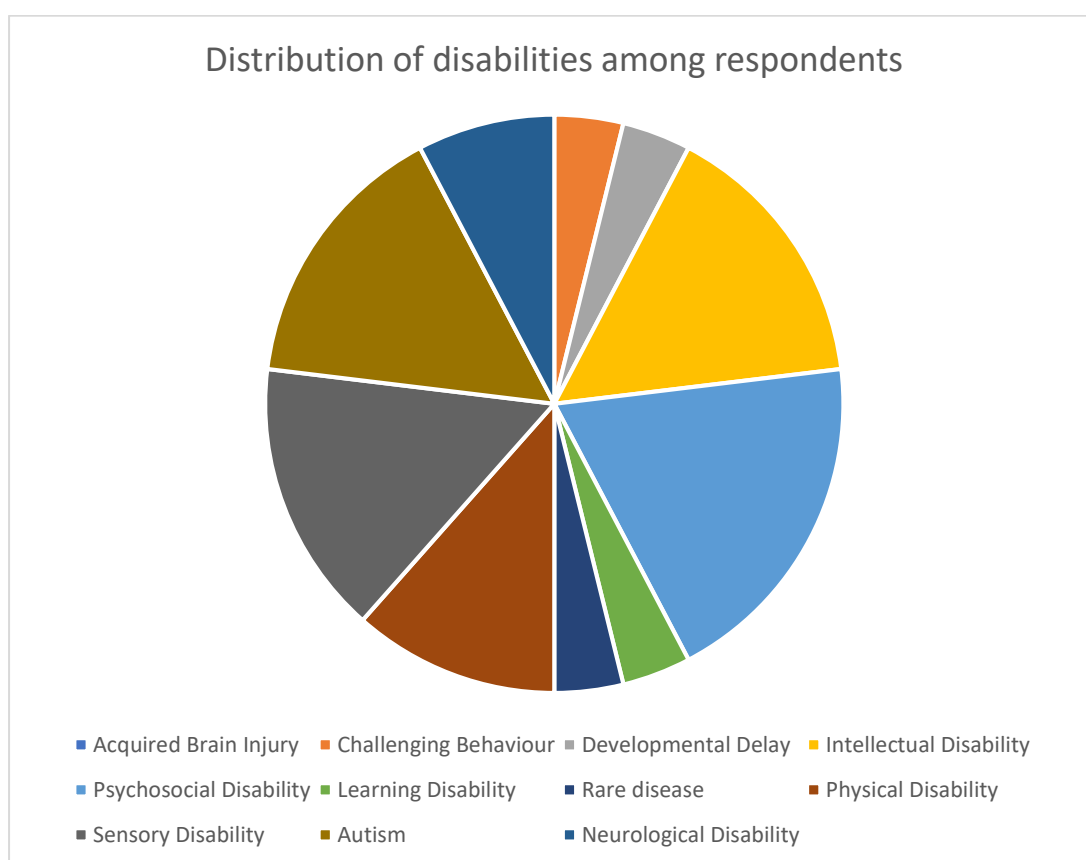
Understanding the impact of diversity

Generally there is more than one best option when considering what might work best for people with disabilities. During the consultations one of the participants stated *The biggest issue is the availability of housing. It is almost non-existent for people with physical disabilities.*

But it is important to remember not to take just one perspective, disability is not an homogeneous condition creating common viewpoints as shown in the quote below.

Quoted from survey response: *Provide permanent affordable relevant livable accomodation for people with psychosocial disabilities . People with physical disabilities get better treatment in general and certainly arnt confined to a piddly bedsit. Define boarders and lodgers and make sure they are legally protected. Make sure vulnerable people have immediate access to robust legal support.*

This submission urges that modelling of tenancy demand is disaggregated by disability in various ways, and the potential positive impacts of legislative change is similarly disaggregated. This will identify the limitations of the legislation to deliver fairer rental opportunities and experiences for all people with disabilities. The proportional distribution of disabilities among respondents to the survey is shown below.



Disaggregating data makes it evident that advocacy and support is essential to achieve fair outcomes from tenancy arrangements, and, that there are limits to how well public housing can be replaced by increasing expectations that private landlords will uniformly be more socially responsible and less discriminatory in selecting tenants.

Disaggregating the data at a high level shows that

- Many people with disabilities live with long term poverty which decreases their independence and capacity to find alternative supports as they age. Frequently carers are parents who may pass away leaving the person with a disability with greater need for external supports.
- Indigenous Australians experience a high rate of disability (ABS, 2015). About a one-quarter (23.9%) of Indigenous Australians report living with a disability (ABS, 2015), with Indigenous Australians aged 35–54 years around 2.7 times more likely to have a disability than a non-Indigenous person (ABS, 2012)²
- People exiting prison have higher rates of disability than the general population and higher rates of homelessness and sleeping rough. Self-reported disability increased from one-quarter (26%) of prison entrants aged 18–24, to 42% of prison entrants aged 45 and above. There is also a high level of borderline intellectual disability (25% -30%) and mild intellectual disability (10%) among people in prison. (Hellenbach et al. 2017)³.
- Our population is ageing and according to the UN, more than 46 % of older persons – those aged 60 years and over—have disabilities. It is important to distinguish between persons with disabilities growing old and people ageing into disability⁴.
- People with significant complex intellectual disabilities such as ASD are often deemed unsuitable for private rentals, as they require more robust accommodation, which is less likely to be damaged. The nature of the disability affects the ability to relocate, especially with regard to rental property⁵.

The ability of the private rental market to adapt enough to meet tenancy needs of the many and varied circumstances of people living with disability is not assured through

² Michelle S. Fitts & Karen Soldatic (2019): *Why Extended Time on Newstart is Unsuitable for Aboriginal and Torres Strait Islander Australians Living with a Disability*, Australian Social Work, DOI: 10.1080/0312407X.2019.1683214

³ Australian Institute of Health and Welfare 2019. *The health of Australia's prisoners 2018*. Cat. no. PHE 246. Canberra: AIHW.

⁴ (Council of Europe, 2014; Doron & Apter, 2010). Birtha, M., Rodrigues, R., Zólyomi, E., Sandu, V. & Schulmann, K. (2019). *From disability rights towards a rights-based approach to long-term care in Europe*

⁵ Consultation Report on the results from consultation with stakeholders to identify the experiences and the barriers when seeking rental accommodation that is secure, affordable and accessible. PWDWA, June 2020

legislation. Public awareness and understanding is growing but when taking action to assist people with disabilities conflicts with landlords own financial security or confronts a landlords lack of practical skills and capacity to be responsive, landlords are more likely to exit the rental market or to act discriminatingly when accepting tenancy applications.

The balancing act of prescribing what is fair for tenants with what is achievable through the private rental market will leave ongoing gaps in the housing market which will need to be addressed through public housing. This will be informed by disaggregating demand data for tenancies.

2 Security of tenure

2.1 Length of tenancy - fixed term versus periodic leases

Fixed term versus periodic leases is one example of where multiple options need to be available:

The case for limiting or removing fixed term tenancies and only having periodic leases is that fixed leases are predominantly 12 months and are used as a means of termination by simply not renewing the lease.

The survey information shows that the majority of respondents (80%) want two years plus or as long as needed / lifetime tenure while 20% want 12 month leases. However, this was not periodic leases - those respondents who stated they felt 'not secure and not permanent' had periodic leases and one person lived with a parent. The preference for longer leases was expressed by a survey respondent in terms that suggest long fixed lease options was preferred. One respondent stated they would like a long lease:

Quoted from survey response: Like a commercial lease - 5 years + 5 year extension or 10+years. Long enough for a sense of security and permanence.

One advantage of a longer fixed tenancy lease relates to capacity to secure NDIS funding for modifications to a home. Gaining NDIS support for home modifications is based on an assessment that the person will reside in that place for a long period; fixed term leases for a long period helps demonstrate that the person will reside in that place for a long period.

On the other hand, people with disabilities who are waiting for alternative accommodation availability may prefer short or variable leases, accordingly this submission argues that both options should be available and **that increased support in negotiating a lease be offered to people with disability to achieve a lease that is suitable for their needs and acceptable to the landlord.**

Providing support to people with disability to negotiate a lease will also assist in defining what modifications may be required and how they can be achieved.

The Productivity Commission Report and the report by Consumer Affairs Victoria (EY Sweeney 2016) also found that there were arguments for both fixed term and periodic leases and short and long term options:

- *The Productivity Commission noted that low-income renters are more likely than others to choose to move in order to access more affordable housing. Longer fixed-terms would preclude such moves unless renters were willing and able to break their leases and pay the associated penalties. Although tenants may hold long tenures, the flexibility associated with periodic leases is highly valued*
- *Longer fixed term RT Agreements may be appropriate in some cases, and for some tenants, in particular*
 - *Longer-term renters, Health Care Card holders and tenants with a disability or health condition often prefer longer tenures. A Victorian survey found that these groups were more likely than other renters to prefer to continue living in their current property for at least another two years (EY Sweeney 2016).*
 - *Similarly, Consumer Affairs Victoria (2016) found that people with a disability (who can find it difficult to move and find properties they can modify) and people with low incomes (who are at risk of homelessness if they are not able to remain in affordable accommodation) prefer rental stability.*
 - *The report also identifies that families and older renters also want stability in their housing and longer fixed terms may better suit 'ageing in place'.*
- *The Productivity Commission Report also identifies that families and older renters also want stability in their housing and longer fixed terms may better suit 'ageing in place'.*

The argument that periodic leases combined with removal of 'no grounds' termination options would deliver greater security of tenure is not supported. The CRIS information shows that a very small proportion of terminations was the result of 'no grounds' termination and that the majority of terminations (65%) was due to the end of a fixed term agreement/decision not to renew, however it is not clear how many were the result of the tenant's decision not to renew their lease. In many cases tenants elect to move to a different or better premise or better arrangement.

Landlords experience many costs when terminating a lease, upgrading and cleaning to make it ready for new lease, a period of vacancy to complete these tasks, a further period of vacancy to advertise and select a new tenant and risks in securing a tenant. There are fewer incentives for landlords to ask tenants to leave than there are incentives to roll over the lease.

The experience of respondents to the survey shows that three respondents had had a tenancy terminated when they didn't want it terminated, one due to sale of property, one non renewal of lease and one related to the personal safety of the tenant. The majority of respondents had not had a lease terminated.

The experience of respondents to the survey show that:

- restricting the options for the type of lease available would not necessarily change the security of tenure and may remove needed flexibility of people with disabilities who are waiting for alternative accommodation and prefer short or variable leases,
- removing 'no grounds' termination would potentially assist a small number of people, however the insecurity is a result of the lack of control by tenants over the decision making of landlords

Quoted from survey response Despite promise tenancy for as long as required, there is always the "unknown" if owners have to sell. I have a good relationship with my landlady and she'll renew the lease if I want, but she is also looking to sell soon

In summary the preference is to retain fixed terms with longer minimum timeframes and more automatic extensions, noting the beneficial impact for seeking NDIS support for modifications

CRIS Section 2.2 Fixed term tenancy agreements

Option D is supported *Fixed term tenancies permitted, with tenants entitled to an option to renew for a total minimum period of five years*

Option E is supported – Amend the RTA to incentivise the use of longer fixed term agreements

It is recommended that PWdWA is consulted as part of the discussion on the terms that could be contracted out of, and those that may be added in.

2.2 Notice Periods

Notice periods in all situations should be as long as practicable. Due to the higher risks of homelessness combined with the need for access to health and other community services by people with disabilities, if the tenancy arrangement needs to be terminated it is important that sufficient time is allowed for an alternative appropriate tenancy to be acquired.

It is recommended that notice periods for termination by the lessor of fixed term tenancies up to 2 years is 60 days and 90 days for longer term tenancies.

Retain the notice period for termination by the tenant at 30 days.

3 Reasons for Termination

3.1 No grounds termination

The CRIS data and survey response suggest that the “no grounds termination’ is not a common issue, that what is most important is the time, stress and cost of moving.

CRIS Section 2.1 No grounds termination

Preferred is Option C – Retain no grounds termination but increase the notice period.

3.2 Terminations on grounds of eligibility

Where a carer or support companion of a person with disability earns an income there may be a risk that the proposal as currently worded will cause the tenant to no longer satisfy an income eligibility criteria. In such situations it would be optimal to offer assistance to purchase the modified home in social or employment related housing. This could be achieved through a specific variation to Keystart loans. The benefit would be to all parties, achieving a more permanent home for the person with a disability and reducing demand on public housing.

While this is not delivered through tenancy legislation it would enable the tenancy legislation changes to be positioned in a whole of government view about social housing and meet government commitments to equitable inclusion of people with disability in the community.

CRIS Section 6.1 Eligibility related grounds for termination

Support proposal – with bolded amendment. *Amend the RTA to allow a lessor to terminate the tenancy agreement if the tenant is no longer employed by the lessor or, in relation to social housing tenancy agreements, the tenant ceases to satisfy the eligibility criteria for the tenancy, **except in situations where the eligibility criteria is failed by the carer or companion of a person with a disability.***

3.3 Termination because of sale of premise

The experience of people with disability is that sale of premises is a cause of tenancy insecurity. The notice period needs to be as long as possible and as a far as possible the tenancy should not be terminated as a result of sale of the premise. The preferred position outlined in discussion in Section 2.1 of this submission is that longer fixed term leases are preferred which can’t be terminated because of a sale.

Variable leases have specific benefits for people with disabilities and for lessors. As this is an area where over regulation may have unintended consequences on the market and as a result the availability and flexibility of tenancy options for people with disabilities, the preferred option is to increase notice periods to 60 days when vacant possession is a condition of sale.

CRIS Section 6.2 Sale of premise

Option B is supported as a minimal position *Increase notice period to 60 days' notice ... only on the grounds that the premises have been sold and that vacant possession is a condition of the sale. No termination of fixed term tenancies.*

3.4 Mortgagee repossession

This issue is similar to sale of a premise from the tenants perspective and the same constraints and protections for the tenant should apply.

CRIS Section 6.3 Mortgagee repossession of the rental premise

Support proposal *to amend the RTA to provide that a tenancy agreement does not automatically terminate on possession of the premises where the mortgagee has expressly or impliedly consented to the premises being leased. Possession of the premises can only occur after an order is made by the Supreme Court.*

It is noted that the other reasons for termination remain available to the mortgagee.

3.5 Termination by tenant

Experience of people with disabilities. The preferred position is for people with disabilities to not incur additional cost if they need to terminate a lease. The status quo and Option C both create the risk of incurring additional costs to break a lease and possibly the need to attend Court to gain an order. The current notice period of 21 days should be retained.

CRIS Section 6.4 Termination of the tenancy agreement by the tenant

Support Option B – *Amend the RTA to allow tenants to terminate a fixed tenancy agreement in specified circumstances and in particular the suggested additions are supported:*

- *the tenant requires care in an aged care facility and has accepted an offer of a place in such a facility;*
- *the tenant has been offered a place in social housing, community housing or other supported accommodation; or*
- *the lessor has placed the house on the market for sale and is proposing to conduct home open inspections, and the proposed sale was not disclosed to the tenant prior to entering into the tenancy agreement.*

It is recommended that PWdWA is consulted as part of the discussion of additional grounds for terminating a fixed tenancy agreement.

4 Affordability

4.1 Financial security

Security of tenure is related to cost of rental and risk of cost increases and the consultation highlighted affordability as a significant barrier to security of tenure and having a home. This is particularly for those on fixed or limited income such as a pension with greater difficulties for those who wish to live alone. In addition budgeting issues and lack of financial skills are impediments and there are additional costs into moving into a first home, for example, fridges and cooking utensils. It is unlikely that NDIS covers these necessities.

People with disabilities form a large proportion of vulnerable private renters. In addition the higher rate of unemployment among people with disabilities increases the likelihood of people with disabilities experiencing persistent rental stress and less capacity to select accommodation that is appropriate to their needs.

The Productivity Commission Report used ABS data to show the proportion of various characteristics in private renter households with low incomes, 2017-18. 88% are dependent on government pensions and allowances and between 51% and 65% of households include a person with a disability, or, the reference person for the household has a disability or restrictive long term health condition.

Household characteristic	Low-income (%)
Includes at least one person aged 65 or over	69
Household reference person's main source of income is government pensions and allowances	88
Includes at least one person with a disability or long-term health condition	51
Household reference person has a disability or long-term health condition	56
Includes at least one person with a disability that results in a limitation or restriction	58
Household reference person has a disability or long-term health condition that results in a limitation or restriction	65

4.2 Frequency of rent increases

When a person with a disability has suitable accommodation it is particularly important that the person can achieve security of tenure. Limits on rent increases are an important factor for security of tenure. This may require adjustments to Commonwealth Rent Assistance, in some market situations.

In no cases, is a 6 monthly rent increase supported and this should be removed from the legislation. Other Australian jurisdictions limit rent increases to 12 monthly intervals and is the minimal position that is supported.

It is preferred that a lessor would not be able to increase the rent more frequently than at two yearly intervals unless there has been substantial improvements in the amenity of the premises during this period. The notice period for intended rent increase should be 2 months in line with other notice periods

Quoted from survey response The place is not in great order and rents are rising hard in spite of that

It's scary knowing the landlord can end the lease with no reason. I once asked to reduce the rent price, I was told I would have to go on a 6-month fixed term lease to do this. I'm worried that they'll use that again in the future, especially as rent increases.

CRIS Section 4.4 Frequency of rent increases

Option C is preferred – allow for rent increases at not less than 2 yearly intervals.

4.3 High pressure rent zones

High pressure areas created extreme hardship for many vulnerable people and it should be a primary goal to prevent this level of hardship occurring. A key issue is identifying how high pressure areas are defined. Most notably high pressure areas are where mining booms have created pressure for scarce accommodation and the market has capacity to pay very high rents (mining companies).

People with disabilities can also be susceptible to high pressure rent zones that are created as a result of development, particularly new transport and facilities.

The options provided address:

- known high pressure rent zones *determined by historical data and based on those regions that have shown themselves to be highly susceptible to sharp spikes in rental affordability, for example, mining towns like Port Hedland and Karratha, or*
- options to cap all rent increases.

In the discussion in section 4.2 above we recommend limiting rent increases to 2 yearly increases which may create a slowing of private investment in the rental market. If further controls to income from rents by government are applied, such as capping all rental increases, it may create unintended reduction in the availability of properties for lease. Accordingly Option C (capping all rent increases) is not preferred and designating certain zones as high pressure rent zones is preferred.

CRIS Section 4.5 High pressure rent zones

Option B is preferred – Cap on rent increases in designated zones.

4.4 Other ways to address rent increases

The CRIS paper seeks further comment on ways to address rent increases.

There is a need for more affordable housing in Western Australia. The market currently fails at providing a sufficient and affordable housing supply and allocating the affordable properties to those who need them. Ultimately, this will require an increase in funding for supply of public housing.

There was a significant level of concern over the availability of appropriate rental housing and advocacy for greater action by government to generate opportunities for home ownership and purpose built housing.

Quoted from survey response I can't afford to rent. But evidently I wouldn't get SDA. It's stupid.

It is expensive and unstable having to rent and we would like a purpose built home

Renting is "Dead Money", the money spent on renting, does not achieve any outcome other than making a Landlord richer. I do not want to share with other people, because of my sensory disability. Other members of the house don't understand to shut cupboard doors, put things back with they belong, not moving my items to different places, not understanding my need for lighting, other members of the house don't understand why my assistive technology is audible "speaks out loud" to me.

The following points are quoted from the summary of consultations (attached) and emphasise the need for additional options and supports.

- *Department of Housing and CDHP lists are very long and there is a considerable wait time. Those that wish to live independently can be stuck in limbo for years, waiting for accommodation. People with disabilities in their twenties to forties, who could live more independently, are often living with their families because there is no other option out there for them.*
- *The lack of available housing means that individuals are placed in unsuitable housing situations whilst they wait, for instance, with others of non-compatible disabilities/interests/personalities. This can be detrimental to their mental health and well-being. One consumer who has become homeless and resorted to couch-surfing whilst waiting for accommodations writes "I wouldn't wish it on anyone" (Consultation Participant/Consumer).*
- *Renting a property to a person with disability is not usually attractive to landlords. This hesitancy may be due to fears about how the person will look after the property as a tenant. There can be a perceived stigma or lack of understanding about individuals living with disability from real estate agents or landlords. Where a*

disability is apparent, often a person is deemed to be part of a perceived stereotype and negative assumptions are made about capacity.

It is recommended that as a result of this consultation process the Department of Commerce:

- **advocate for adjustments to Commonwealth Rent Assistance to keep pace with market trends**
- **sponsor adequate government housing assistance for the most vulnerable renters**
- **promotes an increase in the amount of public housing that is available, and**
- **supports initiatives that assist people with disabilities to become home owners.**

5 Appropriateness

5.1 Minimum standards

Prescribing and monitoring minimum standards of housing would likely assist with difficulties experienced in getting maintenance and repairs done.

The intent of assuring minimum standards are achieved in rental housing is supported, however, it is not clear how prescribing and monitoring minimum standards would be applied in a way that works across all regions. It is also not clear who would bear the cost involved in monitoring and inspecting all rental properties.

Comments from people with disabilities focused on the need to apply Livable Homes standard to rentals.

Quoted from survey response The rental market needs to include accessible homes built to the Livable Housing Design Guidelines at Gold or Platinum levels. Landlords need to be more aware of the differing needs of people with disabilities. Landlords need to understand that Guide Dogs are NOT pets.

I guess 'investment' builders could be encouraged to build home for disabled with Government "money carrot" incentive.

While not an option canvassed in the CRIS, however one approach could be for the Government to apply some form of incentive to encourage adoption of livable homes standards in construction and renovation projects.

CRIS Section 5.1 Minimum standards

Option B is preferred – *Amend the RTA so that minimum standards for rental premises, and the process for monitoring and enforcing those minimum standards, can be prescribed.*

It is recommended that:

- **PWdWA are consulted as part of the process of defining minimum standards.**
- **the Department of Commerce promote strategies that will increase the availability of gold standard accessible housing in the community.**

5.2 Modifications

The importance of design, fit-out and accessibility is reflected in responses to the survey responding to the question ‘Does accommodation fits your needs?’ Almost two thirds of respondents affirmed that the accommodation fit their needs with the common reasons being ‘right size, fit-out, purpose built and accessible’.

One third of the respondents to the survey replied in the negative with reasons being ‘lack of space, needs renovation, not accessible and not secure.’

The option for tenants to make minor changes to the premises that can be removed or undone so that the property is restored to substantially the same condition it was in at the start of the tenancy (fair wear and tear excepted) is supported. This includes that a tenant would be entitled to make modifications needed to improve disability access or ageing in place. Modifications over and above these would continue to require the consent of the lessor, but the lessor cannot unreasonably withhold their consent.

Option C *a tenant may make alterations to the premises only with the lessor’s consent, but that the lessor must obtain an order that withholding of the consent is justifiable* is not supported as it will likely cause significant delays and involve processes that will be hard to navigate.

CRIS Section 5.2 Modifications to the premise

Support Option B *Amend the RTA so that a tenant is entitled, without consent of the lessor, to make minor modifications that do not impact the structural integrity of the premises and can be easily reversed, or to improve disability access and ageing in place, and to make any other modifications with the lessor’s consent, which cannot be unreasonably withheld.*

5.3 Pets

Quoted from survey response *Currently good they put a doggie door in for my dog. I keep their house clean and my dog guards their home.*
Landlords generally don't want pets. I've made do without a pet, but would love to have a pet for companionship.
My dog is the most important thing in my life.

Pets are important companions and as tenancies are likely to be held for long periods of time it should be a normal part of having a home.

For people with disabilities and many people living alone a pet is their main companion.

CRIS Section 5.3 Pets in the rental premise

Support Proposal - *to amend the RTA to allow tenants to keep pets at the premises unless the lessor applies for and obtains approval confirming it would be unreasonable to allow the tenant to keep the pet at the premises.*

5.4 Maintenance and repairs

The majority of responses to the survey indicated that landlords were responsive in delivering maintenance and repairs but 20% indicated the Landlord made it difficult and 20% indicated the repairs and maintenance were only partially done.

This issue is aligned to the issue of prescribing minimum standards and the CRIS paper quotes that calls to Consumer Protection from tenants regarding lessors not performing maintenances on the premises accounts for approximately 10 percent of the calls received from tenants.

The current situation, Option A, allows for tenants to undertake repairs and seek compensation from the landlord and the alternative, Option B, would require all lessors to lodge a lessor bond with the Bond Administrator which would, subject to an application from the tenant to the Bond Administrator, pay for repairs to be done.

The best result for people with disabilities is for there to be a sufficient supply of appropriate accommodation. Option B is a blanket solution introducing an additional layer of government activity that works as a penalty for the majority of landlords who have repairs done. This option has potential negative consequences in deterring private landlords from entering the market.

The need is for maintenance and repairs to be timely, appropriate and at the standard required. Potentially a mediation approach would assist in achieving this.

Comments provided in the survey about maintenance and repairs suggest that Option B may not result in the level of improvement that is intended. One of the quoted comments is from a person with a disability who is a home owner and one is from a Homewest tenant.

Quoted from survey response I have been able to do some repairs covered by Insurance. I have been able to do some repairs or maintenance at my own expense. There are some repairs or maintenance that I haven't been able to do due to the costs. (Homeowner)

Need more support in Homewest housing for people with disability. Homewest don't like to pay for full jobs just the cheapest and thats doesn't always work the safest for people with disability.

CRIS Section 5.4 Ongoing maintenance and repairs

It is recommended that further options are explored other than Option A and Option B as proposed, including achieving outcomes through a mediation service.

6 Leasing information, advocacy and support

6.1 Lessor Information disclosure

The lessor disclosure requirements in other jurisdictions aim to prevent misleading information and information about potential sale of the property being withheld. It is important to also include the heightened vulnerability of the person living with a disability in required disclosures. The lessor should disclose information that is in the interest of safety of a person with a disability, for example a single woman living in high crime area.

Option B is supported to assist tenants to be well informed about any risks of having to move sooner than desirable as a consequence of the imminent sale of a property and to contribute to protection of vulnerable tenants.

Option C is not supported because of the likely cost.

The priority for any additional expenditure should be mediation services and advocacy support that works like an accommodation broker for people with disability, in particular for people with conditions that affect the ability to represent oneself, negotiate and understand legal documentation.

CRIS Section 3.2 Lessor disclosure

Support Option B - with additional clause highlighted. Mandatory disclosure about the premises, including information the is pertinent to the safety of a vulnerable person.

6.2 Information provided

The issue of tenant and lessor rights and responsibilities works with the issue of optimal dispute resolution processes. In general there needs to be significantly more attention paid to how information is communicated and what supports are in place for both lessors and tenants to achieve and understand an agreed lease. Information

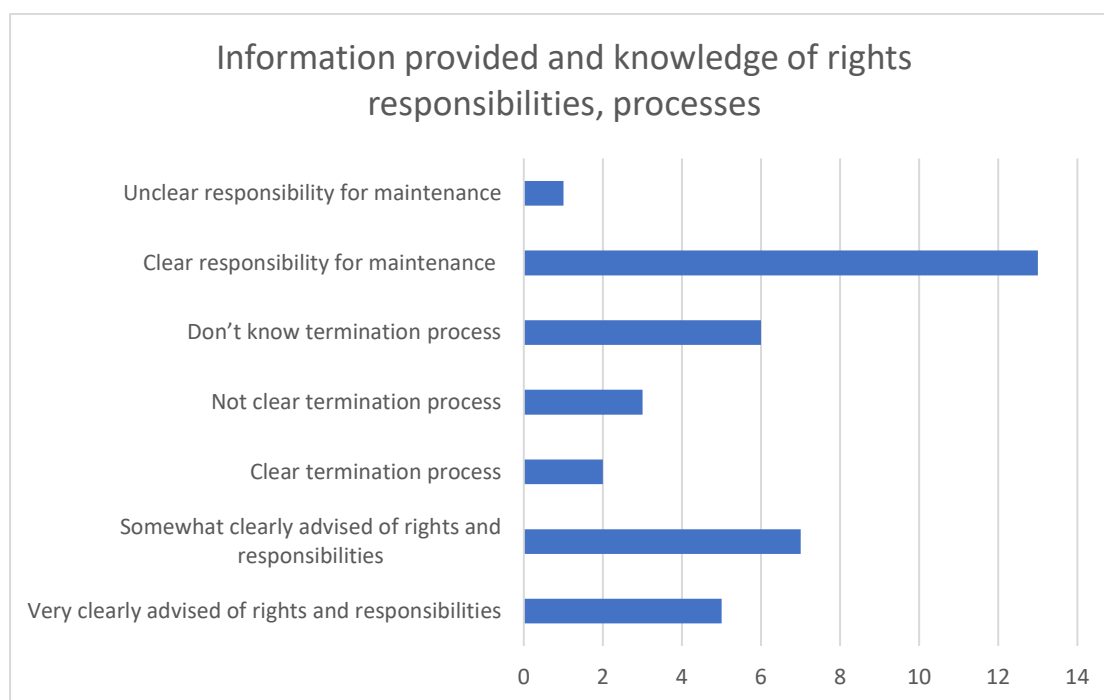
Quoted from survey response More Verbally would be been more useful and written better

Lease agreement explained was standard lease agreement but lease agreement not very clear as its in legal-ese

provided through the survey shows that while information on rights and responsibilities was given to tenants it wasn't well understood.

Information needs to be provided in an accessible format, in plain language and available in multiple formats and also there needs to be support for both lessors and tenants in working through their respective roles and responsibilities.

The survey revealed that knowledge of responsibilities was quite varied



6.3 Additional information and inclusions in leases

Overcoming barriers to achieving a long term lease and ongoing positive communications between landlords and tenants requires that specific additional steps are taken in the early stages of forming a lease agreement. Some of the issues that need to be discussed include:

- opportunities for modifications if required and what funding through the NDIS may be available to the tenant,
- potential for the need for hospital stays and need for maintaining the property, pets and tenancy during those periods,
- other supports that may be required suggest as involving guardians.

The following quote is from the summary of consultations (attached) and emphasise the need for additional inclusions in the process of options and supports.

“I can only speak from personal perspective and some views expressed by other parents in conversation. We are in early stages of preparing for Aaron's move to his own place.

1. I feel that the review should be undertaken underpinned by principles of inclusion and inclusive practice in that people who are vulnerable for whatever reason should be provided with appropriate supports including education, in the process and post the moving into one's own home.

2. Any 'agreement' ought to include details and processes unique to a person with disability and others who are vulnerable. These should cover:

i) Contact details for Guardian or other/s trustee who would be a "go to" person for a Landlord should there be a problem;

ii) Contact details for an officer within the formal system (i.e. official tenancy organisation, tribunal and/or other);

iii) Contact details for LAC for disability related issue/s.

I feel if a potential landlord had this information he/she would be more accommodating in the knowledge that there was a person who could solve a problem if or when one arose rather than enter into a lot of dialogue with the tenant where it could be a simple matter of emailing the tenant and copying in the appropriate agency/person.”

“If a person with disability wishes to rent privately, a support coordinator or organisation would need to be involved to support the person through the difficult application stage. A high level of advocacy is required to help the individual or family with disability to obtain housing. Family support is not always present”.

The issues put forward in the CRIS for rights and responsibilities are supported in general, however additional action is needed to overcome barriers for people with disabilities to achieve appropriate and stable tenancies. A recommendation from the consultation is that lease agreements need to *“include details and processes unique to a person with disability and others who are vulnerable.”*

CRIS Section 5.7 Tenant and lessor rights and responsibilities

Support the proposal - to amend the RTA to:

- *allow lessors and tenants to agree for the tenant to share in the repair and maintenance of the premises where the tenancy period is greater than five years and the tenant has greater rights in relation to making modification to the premises;*
- *allow a lessor or tenant to commence termination proceedings where the other has committed repeated serious breaches of the agreement or the Act within a twelve month period; and*
- *create an offence under the RTA of wilful damage to the premises.*

It is recommended that:

- **a plain English version of a lease and education material in multiple formats is developed to explain the rights, responsibilities and supports available to tenants and landlords**
- **guidelines for creating leases with people with disabilities that assist with clarifying any unique circumstances and arrangements are provided**
- **access to mediation for people with disabilities is made available.**

7 Easy access to resolving disputes

7.1 Disposal of security bonds

The proposal to simplify disposal of bonds is supported. The process would allow either party to apply to the Bond Administrator for release of the security bond and that the Bond Administrator is obligated to seek the views of all other interested parties before releasing the security bond. The Bond Administrator would do this by sending an email to all other persons whose names are on the bond record, as currently occurs in New South Wales, Queensland, South Australia and Tasmania. If the Bond Administrator does not receive a response, or the parties agree to the original claim, the Bond Administrator will dispose of the bond. If the claim is disputed, then dispute resolution is to be applied.

CRIS Section 7.1 Disposal of security bonds

Support proposal to amend the legislation as stated.

7.2 Resolving other disputes

The survey responses identified that one quarter of tenants had experienced a dispute. Of those that responded to the survey half thought there was a clear way to resolve disputes, and the balance either stated there wasn't a clear way to resolve disputes or they didn't know if there was a clear way to resolve disputes.

The current processes are slow and often difficult for people with disabilities. Mediation in conjunction with advocacy support for the person with disability as part of the process is likely to result in easier resolution of issues. The options for escalation if the dispute is not easily resolved are supported, that is both Option C and Option D are supported.

There is the potential for Option D to consume resources that are better applied to expertise in mediation and it is recommended that a full assessment of the cost of all options is undertaken and that the priority be given to establishing an effective mediation service, supported by advocacy support for people with disability.

CRIS Section 7.2 Resolving other disputes

Support Option C

Support Option D on the basis that priority is given to funding the mediation service and **if there is a risk of reducing the mediation service to fund the Commissioner role then Option D is not supported.**

8 Boarders and lodging

A number of people with disabilities rely on boarding and lodging arrangements for long term accommodation. There are advantages to having the rights and responsibilities of boarders and lodgers and their landlords enshrined in legislation. Currently WA is the only jurisdiction to not have some form of regulation of boarding and lodging.

The responses to the survey included comments on experience of boarding and one of the consultation submissions referenced the experience of boarding as follows.

The Accommodation was under Board & Lodging which meant I couldn't really fight the eviction notice. Even though it was unjustly. When I was evicted I sought an advocate regarding this. I then went into limbo.

In terms of what I have gone through and in relation to tenancy (I wouldn't wish it on anyone). I think that board and lodging should be scrapped from the tenancy act as what I been through and what I was told when I was unjustly evicted that with board and lodging that they can evict you for any reason and at any time. It does not help people who have certain physical needs as well as supports and it makes them in a super vulnerable position if they don't have any supports.

The aim of including boarders and lodgers in the tenancy legislation would be to provide adequate protections for tenants. The option of a two tiered model of regulation is supported. This would be one model for boarding arrangements where the lessor lives in the premises and leases out some spare bedrooms, and a different model of regulation for boarding or rooming arrangements that are more tenancy like in their nature insofar as the lessor does not reside in the premises and there are multiple residents in the premises.

CRIS Section 8 Boarders and lodging

Support proposal - *to amend the RTA to introduce regulations for boarding and lodging. The proposal is that where the premises are capable of accommodating above a threshold number of residents, modified tenancy regulations will be drafted and implemented. Where the premises are capable of accommodating below a threshold number of residents, for example in the landlord's own home, the proposal is to introduce occupancy principles.*

It is recommended that PWdWA is consulted as part of developing modifications to tenancy laws and the occupancy principals, as well as the threshold number of residents.

9 Other Issues

The following issues raised in the CRIS have generated less discussion – the recommended position reflect the views of people with disabilities where possible.

CRIS Section 3.1 Regulating the tenancy application process

Support proposal to amend the legislation to prohibit certain information being required from a prospective tenant and to introduce regulation in relation to the use, storage and disposal of information

CRIS Section 4.1 Option fees

Support proposal to amend the legislation to prohibit a lessor from requiring applicants to pay an option fee.

CRIS Section 4.2 Amount of security bond

Support proposal to retain the current provisions in the RTA for the level of security bond

CRIS Section 4.3 Bond guarantees and alternative bond products

Support proposal to retain the current prohibition on bond guarantee products in the RTA.

CRIS Section 4.6 Charges for utilities

Support Option A – Retain status quo tenants will only be required to pay for consumption of the utilities. In these instances, the lessor will continue to pay other additional charges including those for supply and administration of the utility account. Other options are likely to increase costs to tenants.

CRIS Section 4.7 Rates and other charges

Support proposal to retain status quo - prohibit a lessor from passing on rates and charges to the tenant.

CRIS Section 5.5 Drug testing of the premises

Support proposal *not to require mandatory testing for drug residue during or between tenancies. Rather, it is proposed that lessors, property managers and tenants be educated to follow the DoH Guidance.*

CRIS Section 5.6 Swimming pool fence certification

Support proposal *to amend the RTA to require a lessor to provide a tenant with a swimming pool barrier certificate of compliance at the commencement of the tenancy.*

CRIS Section 9 Modifying the RTA in certain circumstances

It is recommended that

- people with disabilities are given specific consideration in modifying the Tenancy Act including the issues and recommendations outlined in the different sections of this submission
- any amendments are *underpinned by principles of inclusion and inclusive practice in that people who are vulnerable for whatever reason should be provided with appropriate supports including education, in the process of and post the moving into one's own home⁶.*

CRIS Section 10.1 Knowledge of the law

Support Option B - *Voluntary qualification for private lessors*

CRIS Section 10.2 Register of lessors

Neither option is preferred, there is likely to be significant cost involved which would be better expended on providing mediation and advocacy support for people with disabilities.

CRIS Section 10.3 Code of practice

Support the most cost effective approach to improve the knowledge and conduct of lessors.

CRIS Section 11.1 Disposal of abandoned goods

⁶ Consultation Report on the results from consultation with stakeholders to identify the experiences and the barriers when seeking rental accommodation that is secure, affordable and accessible. PWDWA, June 2020

Support proposal to *amend the RTA to allow a lessor to determine how to dispose of the goods*

CRIS Section 11.2. Rights of occupants in shared housing arrangements

CRIS Section 11.2.1. Sub-tenants

Support proposal to *amend the RTA to provide that a subtenant becomes the head tenant, in circumstances where the head tenant is evicted.*

CRIS Section 11.2.2. Co-tenants

Support proposal to *amend the RTA to provide that a co-tenant may terminate their own interest in a tenancy agreement either at the end of a fixed term or if the agreement is a periodic agreement; and to clarify the process for determining the departing co-tenant's rights to any proportion of the security bond at the conclusion of their interest in the tenancy agreement.*

Residential Tenancy Act Review– Report on the results from consultation with stakeholders to identify the experiences and the barriers when seeking rental accommodation that is secure, affordable and accessible.

Report By: Jill Mason

Disability Awareness Training

Date: 9 June 2020

INDEX

Title	Page 1
Aim of the Project	Page 3
Project Definition	Page 3
Methodology	Page 3
Analysis of Feedback	Page 4
Responses providing Expanded Feedback	Page 8
Appendix I – Survey Monkey Questions	Page 18

SUMMARY OF FINDINGS

Residential Tenancy Act (RTA) CONSULTATION

Aim

The aim of this project was to ensure the experiences and perspectives of the diverse range of people with disability are represented in PWDWA's submission to the Department of Mines, Industry Regulation and Safety (Consumer Protection Division) in relation to the review of the Residential Tenancy Act. PWDWA wishes to identify the systemic barriers people with disability face when seeking accessible, safe, affordable and inclusive homes and to:

Undertake a consultation process to determine and detail the experiences of people with disability in accessing rental housing in Western Australia; and

Identify opportunities for reform and advocate for systemic change across the community to address the barriers identified.

Reporting Requirement

The brief for this part of the project was:

- Submit a written report to the PWDWA by 10th June 2020 which specifically addresses the experiences and perspectives from a range of individuals and organisations with relevant experience and knowledge of the challenges and issues as outlined in the Project Brief.
- Provide details of challenges or opportunities in order to highlight the salient issues.

Project Definition

Record the experiences of a diverse range of people with a disability in a variety of rental housing, including hostels and group homes noting the key issues people with disability see as important for secure, affordable and accessible rental.

Key issues include:

- accessibility of housing
- affordability
- appropriateness
- location
- improving security of tenure for tenants;
- should termination of a tenancy require reasons and do away with "no grounds" terminations
- disclosure of important information before a tenancy begins
- minimum standards of rental properties and maintenance and repairs
- tenant responsibility for wilful damage
- bonds, rental increases and other charges

- making a rental property a home including the right to keep pets and make minor modifications
- regulation of boarding and lodging and room-by-room rentals
- changes to the dispute resolution process

Methodology:

Research for the project was conducted from March to June 2020. Information and experiences were collected directly from people with disability and/or their family members and from representatives of Disability Service Organisations via:

- a) A questionnaire was forwarded to seven (individuals) who requested contact following an invitation to comment. Two (2) individuals responded.
- b) Individuals were invited to attend a Focus Group at City West Lotteries House. Information in regard to this event was distributed by PWdWA, Shelter WA, Carers WA, DDWA, and Valued Lives. Although 3 people registered, no one attended the event.
- c) Five (5) organisations were contacted by email and/or phone and invited to provide feedback/comment. One (1) organisation did not comment. One (1) organisation invited members of their Consumer Consultation Committee to comment or be interviewed to which there was no response. Three (3) organisations were interviewed.
- d) Three (3) individuals supporting a child or grandchild living with a disability were invited to attend an interview or comment. One (1) interview was held and two (2) individuals made comment.
- e) The Survey Monkey link to the survey was made available via PWdWA's Facebook page on 21/5/2020 and again on 3/6/2020. and was also distributed to members via the e-Newsletter (using Mail Chimp) on 3/6/20. Sixteen (16) responses were received.

Information from consultations has informed this response to the review of the Residential Tenancies Act Review.

Interview and feedback analysis:

Accessibility of housing

- Stock or options of housing is a major issue: there are few available for people on pensions to access, particularly those with physical disabilities.
- Department of Housing and CDHP lists are very long and there is a considerable wait time. Those that wish to live independently can be stuck in limbo for years, waiting for accommodation. People with disabilities in their twenties to forties, who could live more independently, are often living with their families because there is no other option out there for them.
- The lack of available housing means that individuals are placed in unsuitable housing situations whilst they wait, for instance, with others of non-compatible disabilities/interests/personalities. This can be detrimental to their mental health and well-being. One consumer who has become homeless and resorted to couch-surfing whilst

waiting for accommodations writes “I wouldn’t wish it on anyone” (Olivia Davis, Participant/Consumer).

- Renting a property to a person with disability is not usually attractive to landlords. This hesitancy may be due to fears about how the person will look after the property as a tenant. There can be a perceived stigma or lack of understanding about individuals living with disability from real estate agents or landlords. Where a disability is apparent, often a person is deemed to be part of a perceived stereotype and negative assumptions are made about capacity.
- If a person with disability wishes to rent privately, a support coordinator or organisation would need to be involved to support the person through the difficult application stage. A high level of advocacy is required to help the individual or family with disability to obtain housing. Family support is not always present.
- There is competition for appropriate rentals; accommodation requirements for other vulnerable groups such as foster-children will further impact availability of tenancies.
- An impediment to investors making their houses available to people with disability can be the modifications required to the property and how this is managed. If modifications do not add value to the property then an investor or landlord is unlikely to commit to this as there is no perceived return on investment. Concerns about who will pay for removal of modifications and the timeframe for this (potentially leading to loss of income between tenancies) are also an issue.
- NDIS fund core support, but not bricks and mortar. There are a lot of people on NDIS in inappropriate housing; they might be in a private rental but it is not necessarily physically accessible, for instance, with wide enough doorways.
- The current housing and rental environment does not cater well for the “unforeseenness” of health circumstances. Sudden changes to care needs are not easily able to be accommodated in many housing situations, and there are untimely wait-periods to implement new plans.
- Co-signing leases allows for a more equal power balance between residents and carer or housemate. Having a carer or co-resident also sign the lease is likely to be more attractive to the landlord, as there is another presence in the house and another name on the lease and another substantiated income.
- Rental applications generally require referees and other rental history that those who have been living in supported accommodation are likely not to have.
- Current building codes are not always conducive to people living with disability. If this was changed and all new buildings featured larger doorways etc. this would increase the ratio of available homes for people with disability.
- “When we were looking for an 18 month tenancy whilst a new purpose built home was under construction for my husband and I and our two grandsons living with autism, intellectual disability, Tourette’s and challenging behaviour, the real estate agents treated us like we had leprosy” (Anonymous).

Affordability

- Affordability is a significant barrier, particularly for those on fixed or limited income such as a pension. Budgeting issues and lack of financial skills are also impediments. There are greater difficulties for those with disability who wish to live alone.
- There are additional costs into moving into a first home, for example, fridges and cooking utensils. It is unlikely that NDIS covers these necessities.
- General costs of private rentals such as maintenance, gardening and power are also not covered by NDIS.

- Compensable clients have greater affordability for rentals than funded clients through DSP, as they have often received a significant pay-out or have funds available and managed by a private Trustee
- Lack of affordability and insufficient disposable income can affect people living with disability's desire to relocate, as well as dealing with the stresses of a new environment and needing to make modifications.
- The expense of renting in a more affluent area is likely to deter people with disabilities, resulting in further isolation and social issues because of a lack of options in cheaper areas.
- Inability to easily fund required modifications. One consumer writes: *"unable to get government grants for bathroom modifications and air con unit, unable to do many home improvements. Please allow grants from Indigo and Lotteries West and money from NDIS to be used in a rental property even though it may not be permanent for modifications and air con and insulation"*. (Mark Blowers, Participant/Consumer)

Appropriateness

- Some of the factors of appropriateness of housing include location, equipment, if the house has to be modified, cost, and availability.
- Newer properties seem to be more suitable for people with disabilities. However, there are few flats suitable with wide doorways for people living with physical disability. Staircases and limited supply of housing, particularly for those requiring modifications done such as hoists. Older homes or a place with staircases reduces the supply.
- *"A tension exists between what the person with disability requires, the funding of the modifications and whether the landlord will agree with that or not. This tension is not easy to overcome"*. (Ian Burns, At Home Health)
- People with significant complex intellectual disabilities such as ASD are often deemed unsuitable for private rentals, as they require more robust accommodation, which is less likely to be damaged. The nature of the disability affects the ability to relocate, especially with regard to rental property.
- Appropriateness needs to look to the heightened vulnerability of the person living with a disability. For example, a single woman living in high crime area.
- People with disability may be forced to stay in units with people that are predatory or could take advantage of them or higher crime rates.
- Often external space/or yard around rental property is needed to allow for individuals with disability whose behaviour may be accompanied by noise/loud voices/screams.

Security of tenure

- Traditionally the least amount of time a property can be leased is 6-12 months. Increasing the length of tenancy would be very attractive to the person with the disability by increasing security as well as to the landlord by guaranteeing income for a significant period.
- Like all rental properties, owners chose to move back into their property, or sell them, and this affects the security of tenure for people with disability.
- Budgeting skills may need to be enhanced so that people with disability can continue to afford rent and therefore have security of tenure.
- A significant barrier to the security of tenure is behaviours of concern for neighbours, and these are usually found in people living with psycho-social disabilities rather than physical disabilities.
- People with disabilities might not be able to demonstrate their ability to manage their money and provide financial history or required referees to potential landlords. Even if

their DSP can cover the rent, it is unlikely they will be considered equally with a prospective tenant without a disability.

- There are difficulties for people with disability regularly requiring hospital care, resulting in their accommodation being vacant, but still incurring costs. They may be able to make rent but not maintain the property. Landlords may not wish their property to be tenanted but vacant for long periods of time.
- Security of tenure needs to occur to make modifications worthwhile.
- Education or improving life skills is often necessary to *“help people moving out of home to ensure proper care and maintenance of a home. ...If these areas are not given due attention, it would be highly likely that the condition of the home and the tenant would become unhealthy as would the value of the property.”* (Jane Eacott)
- Lease agreements need to *“include details and processes unique to a person with disability and others who are vulnerable.”* (Jane Eacott). Examples of these include guardian/trustee, LAC etc. and would help landlords address issues by including the appropriate parties as part of any communication.
- Eviction notices in accommodation needs to take into account the length of time it takes a person with disability time to relocate, otherwise homelessness issues can arise.

Location

- Affordability is difficult in Perth due to expensiveness of different regions. The outer suburbs are cheaper; inner-city options are usually out of reach due to cost. Central suburbs that do have available housing, such as in Maylands, are often in double story complexes which are not appropriate for wheelchair access.
- For younger consumers/participants having accommodation near their school is important
- Respite services and new accommodation may not be able to be in the same location.
- SDA is primarily South of the River and there are not many available.
- Individuals living with disability who require 24/7 support access to carers, need accommodation that is located within access of a service provider and/or their staff. It is difficult to assist people to do this when there not a lot available in surrounding locations.
- Affordability effects location of rented properties; *“the result of this is that people who were already vulnerable because of the result of their disability are then at risk of increased isolation and socially at risk because there’s lack of options. People with disabilities are then forced to stay in units with people that are predatory or live in higher crime rate areas”*. (Sebastian Kane, My Place)
- A suggestion by Consumer Mark Bowers: *“Get the Department of Housing to buy up buildings like the Wool stores in Fremantle so they can build multi-story units all with-in the building and have lift access and maybe even a rooftop Garden and that way for the one building footprint you can create around 100 units of all disability standards”*.

RESPONSES FROM INDIVIDUALS AND ORGANISATIONS PROVIDING EXPANDED FEEDBACK

Individuals contacted:

Ronnie Burkin
Olivia Davis - Consumer
Jane Brown Eacott
Mark Blowers
Grandparents of two young boys with disability

Organisations contacted:

One2One – Consumer Consultation Committee
ShelterWA
Carers WA
Connect Case Management
My Place
At Home Health
Activelinc

Responses:

Interview with Ronnie Burkin – Support Coordinator and Mother of a woman living with Autism.

Accessibility of housing

- Stock or options of housing is a major issue: there are few out there for people on pensions to access.
- Department of Housing and CDHP lists are very long and there is a considerable wait time. Those that wish to live independently can be stuck in limbo, waiting for accommodation.
- Renting a property to a person with disability is not particularly attractive to landlords. This hesitancy by landlords may be around fear as to how the person will look after the property as a tenant.
- If a person with disability wishes to rent privately, a support coordinator or organisation would need to be involved to support the person through the difficult application stage.
- There is competition for appropriate housing; accommodation requirements for other vulnerable groups such as foster-children will further impact availability of tenancies.

Affordability

- Affordability is a significant issue, particularly for those with budgeting issues and lack of financial skills.
- There are additional costs into moving into a first home, for example, fridges and cooking utensils. It is unlikely that NDIS covers these costs.
- General costs of private rentals such as maintenance, gardening and power are not covered by NDIS.

Appropriateness

- Ronnie's organisation has put together a spreadsheet of all their clients requiring properties at the moment, and there are at least 15 NDIS funded people on the list. This spreadsheet allows their organisation to efficiently research on behalf of the pool of clients, rather than individuals, and means that the research on SDA providers can be used as a resource for all, thereby saving time and leg work.
- Some of the factors of appropriateness of housing include location, equipment, if the house has to be modified, cost, and availability.

Security of tenure

- Traditionally the least amount of time a property can be leased is six months and but usually it is twelve months. Increasing the length of that tenancy would be very attractive to the person with the disability and to the landlord as well, because they have guaranteed income for the next "X" number of year.
- Like all rental properties, owners chose to move back into their property, or sell them, and this affects the security of tenure for people with disability.
- CDHP has more security of tenure, unlike private rentals.
- Budgeting skills may need to be enhanced so that people with disability can continue to afford rent and therefore have security of tenure.

Location

Nil comment.

Comment by Olivia Davis, Consumer living with an Acquired Brain Injury.

Olivia Davis - Experience with Housing

I would like to introduce myself to begin with. My name is Olivia Davis. I am 29 years old and live with a disability. I will be discussing in this document my experiences in terms of searching for appropriate housing.

2010

In 2010 I lived in inappropriate housing which did not suit my needs. I was placed in their by family. I did hurriedly agree due to the fact I “wanted out”. This particular accommodation was supposed to help those who had a mental illness and provided capacity building to live in the mainstream housing. You still paid rent. It was accessible, however was not catered for those with disabilities though they did have a few people like myself with a disability.

Also, due to the model being provided with this accommodation, the length of stay there was at least 12 months. Which everyone was given the heads up regarding this and within 6 months of your stay there you were advised to start looking for Accommodation.

During my time staying there, there were disputes about things, however they were not resolved. I was close to being evicted at one point.

When I started to look for housing when it was close to the month mark. Pretty much any rental application was denied. I believe (even though it wasn't mentioned) it was because of my disability and the stigma around disability. I originally wanted to move into mainstream housing to prove my family wrong and prove people wrong (I was at the time wanted to prove people wrong because of the all the negativity growing up).

When looking for rentals in the mainstream housing, it is very hard to find accessible and affordable housing not to mention the cost of rentals that are quite high. Also not to mention not having certain modification attached to them.

Due to me not having found appropriate housing, I was then put on the housing wait list which is at least 6-7 years on the list. I was then referred to Supported Accommodation in Shenton Park WA where I resided for years.

2011- 2017

In 2011 till about 2017/2018 I resided at Westcare until I was unjustifiably evicted. This was Disability Supported Accommodation.

During my time here, the location was very central very accessible, there was modifications such as Grab Rails and moveable shower head. During my time, we were not allowed pets or sleepovers.

This particular model suited my needs until the management that came in wanted my family to come back into the picture this happened in 2017.

There were some disputes, which didn't get resolved at with the management in the Accommodation and there was mediation with a complaint resolution provider which there was no outcome. They intended and did not care whether I had somewhere or not basically I had to be out. I was served a 30 day notice and with the help of an advocate was able to extend the timeframe of finding Accommodation. It took months to find appropriate accommodation which happened to be in another State.

The Accommodation was under Board & Lodging which meant I couldn't really fight the eviction notice. Even though it was unjustly. When I was evicted I sought an advocate regarding this. I then went into limbo.

This Accommodation had a maintenance person who was really quick in getting things done.

Around the month mark even though I had found accommodation there was a battle in terms of getting the funding which took until July 2019 but because of negations has taken up until now to complete and for me to finally not be in limbo as of next month.

So from 2017 up till now I have been in limbo.

Being In Limbo & My Thoughts

Being in limbo hasn't been fun. Certain things in relation to the support I need in relation to my disability were put on hold/delayed because a) of battling funding processes and the difficulty around finding appropriate accommodation

In terms also with finding appropriate accommodation, prior to finding the right accommodation that suited my needs. In mainstream housing it was noted because of being on Centrelink, the rent would be too high, disability funding with providing adequate support would more than likely provide inadequate support and to make things worse because of not having family support I would be more vulnerable. Not to mention that in most mainstream housing there are no modifications.

I also notice that on rental applications they also ask you for a referee and there are certain questions that are asked and if you don't have a good support system and also have a history of being in Supported Accommodation makes it even more hard. Not only this, having been served an eviction notice I wasn't sure of how it would impact.

Housing Authority priority housing is a 6-7 years and priority is 4-5 years and if you are lucky you would get a spot within a few months and at this current time there is not a lot of specialist disability housing out there for PWD.

In WA mainly I found that there are group homes and if you can't access mainstream housing and if you can get the funding the group home is the main option at the moment unless you have family support.

Due to the NDIS rolling out and yes there is lots of work to be done in this area to improve. However, it has opened up a lot of opportunities in terms of housing. SDA & SIL. Due to lack of options in WA and wanting to be close to my Grandma and away from my immediate family I found a SDA & SIL provider whereby I get assistance in my apartment in a cluster of apartments with what I need and not dictated to of what I need, I also get to have a say in

how I want to have my supports provided so I receive adequate support. I believe there needs to be more of this around the country.

In terms of what I have gone through and in relation to tenancy (I wouldn't wish it on anyone). I think that board and lodging should be scrapped from the tenancy act as what I been through and what I was told when I was unjustly evicted that with board and lodging that they can evict you for any reason and at any time. It does not help people who have certain physical needs as well as supports and it makes them in a super vulnerable position if they don't have any supports.

I would like to see that when it comes to eviction notices, that they take into account of the persons disability and the length of time on average to find appropriate housing which in my case took a while and I was essentially made homeless and couch surfing for a number of months and now I'm now in transit with a group home which is not ideal however due to me getting the funding for over east I know it's not that long to go. Also especially for PWD a year's tenancy agreement that would then come into permanency after a year until you move on is great (this is what I get in NSW).

Funding process takes a while and it is defiantly not in the 30 Day mark. I wish it was but it's not and Generally speaking atm the SDA & SIL process is about a year. It should be a lot quicker if someone has been evicted.

I am not sure with what is involved in a tenancy agreement when it comes to group homes as now because of SIL people now pay rent on top of the SIL payment.

I would love to see that in any Disability Supported Accommodation and in the tenancy act that PWD are fully protected in the tenancy act (to avoid homelessness & couch surfing) such as in my case and even if they want to move on they can fight the eviction notice and at least can have some of peace around it. I would also like to see that there is a reasonable timeframe for someone to find appropriate housing.

As stated before I believe that SDA & SIL are good models for people who want to be as independent as possible but want the comprehensive support that is attached to it and don't want family to be involved.

In terms with Housing Authority there needs to be more Disability designed houses and a lot quicker timeframe when someone is evicted. Agencies such as the NDIS need to act straight away when a PWD is evicted and needs Accommodation that requires funding and the style of model suits their needs.

Even though I have never experienced mainstream housing I am aware of what is out there; I would like to see more disability friendly design housing for those who want to live in mainstream housing and also with this longer leases for PWD and for rental amounts to be calculated based on their pension- (I know where I am moving too they do this).

In General I would like to see that rentals in all types of housing understand disability more and have more awareness and if that person with PWD wants to be in mainstream that say e.g. a form gets filled out of how they will get provided with support to upkeep the place.

Comment by Jane Brown Eacott, Mother of a young man living with Autism and Chair of Human Chain Foundation Inc. (Formerly Foundation for Social Inclusion Inc.)

I can only speak from personal perspective and some views expressed by other parents in conversation. We are in early stages of preparing for Aaron's move to his own place.

1. I feel that the review should be undertaken underpinned by principles of inclusion and inclusive practice in that people who are vulnerable for whatever reason should be provided with appropriate supports including education, in the process and post the moving into one's own home.

2. Any 'agreement' ought to include details and processes unique to a person with disability and others who are vulnerable. These should cover:

- i) Contact details for Guardian or other/s trustee who would be a "go to" person for a Landlord should there be a problem;
- ii) Contact details for an officer within the formal system (i.e. official tenancy organisation, tribunal and/or other);
- iii) Contact details for LAC for disability related issue/s.

I feel if a potential landlord had this information he/she would be more accommodating in the knowledge that there was a person who could solve a problem if or when one arose rather than enter into a lot of dialogue with the tenant where it could be a simple matter of emailing the tenant and copying in the appropriate agency/person.

2. By the way, while I believe the review is specifically geared to rental accommodation, I do feel that there should also be safeguards in place for people who are purchasing their own homes. Contacts would be different of course i.e. local Council (Access & Equity Officer; power, telephone, gas, trouble shooting processes, bank for mortgage payments etc.) Such information to be provided to the person's formal immediate network including fore-mentioned providers.

3. Within the formal disability system, I believe a person who has knowledge, skills, and connections in the relevant 'housing' arena should be vigorously explored.

This sort of person aligned with LAC would be very productive, I feel, in helping a person move forward in a steps process toward having and maintaining one's own home through the plan. This person could be the formal system 'go to person' and could possibly be the LAC if the right skills etc. were on board and hours allowed. The 'person' could take this on as part of another role. It would of course be most appropriate if the person came from local state.

4. While likely not an area under review, I feel that absent in the system overall is, 'Life skills' a necessary part of learning for people moving out of home to ensure proper care and maintenance of a home.

The formal system could usefully look at a course which included: hygiene (personal and home); identifying "non-negotiable" areas of looking after one's home like vacuuming, mopping; general cleaning; rubbish disposal; laundry, cooking etc. If these areas are not given due attention, it would be highly likely that the condition of the home and the tenant would become unhealthy as would the value of the property.

Questionnaire completed by Mark Blowers – Consumer/Participant

RESIDENTIAL TENANCIES ACT REVIEW - QUESTIONNAIRE

Name

Blowers 2310312020 Date

Tenant/Family

member/Guardian/Other

Tenant

1. What type of housing accommodations do you live in/ provide? (eg. hostel, rental, owner occupier). Rental

Does this type of housing fit your needs? Yes

What is good or not good about renting it — either to start with or ongoing? Good Discounted Gov Rent, Bad - unable to Get Gov grants for bathroom modifications and Air Con Unit, unable to do many home improvements

2. On a scale of one to ten, how secure and permanent do you feel your housing situation is? (One being insecure and ten being very secure and permanent). 8

Please give some reasons for giving this score. I feel that there is no reason to be evicted

3. Are pets allowed at your accommodation service/in your home? Do you have one or wish to own a pet? yes allowed but with restrictions, don't have one yet but waiting for assistance dog

Please provide comment on your experience of pets in your accommodation service-The last rental at was a problem as it had a cat and the carpets were not cleaned properly and caused allergy problems

4. Are other people such as guests, family members, sub-letters or boarders able to stay overnight at your home? yes

What is the process for others coming to stay in your accommodation? none

5. With whom do you communicate when there are problems with your housing situation? (For example, problems with neighbours). Dept Of Housing maintenance or complaints dept

Is there a clear and effective way to resolve disputes? yes

Have you had a dispute, what was your experience of how it was resolved? Did the landlord seem to know how to go about resolving it? And were there any specific aspects that needed consideration for disability? yes - noise complaint from another unit in the complex, yes the department had a process in place and resolved it quickly, fixed on the phone and by email so easy

6. Are you able/allowed to make minor modifications to your home? If so, what are you allowed to modify? (For example, improving access, adding handrails etc). Yes - hang pictures, paint walls in pastel colours, or if bit more just need to get approval from the department of housing in writing.

What would you want to modify? and have you tried? wanted to change laundry trough size got approval but had to pay for it myself, i thought should have been paid for by the dept as its a unit for disability and i could not fit the tumble dryer and washing machine side by side as can't reach if stacked from a wheelchair and gap was around 100mm too small but they did approve for a couple more grab rails to be installed

7. How accessible do you find your accommodation on a scale of one to ten. (eg. location, ease of entrance, transport). 10

Is there anything you could see to make it more accessible for you? have the bus stop outside my place have a concrete base and bit of footpath installed from my driveway as it's just grass at the moment

8. For what reasons could your accommodation situation be terminated/finished? If it were terminated, with whom would you communicate about this? can be terminated for non rent payment or bad behavior, dept of housing

Is there a clear process outlined in the event of this occurring? Yes

9. How clearly were your rights and responsibilities in your housing situation made to you? What ways were this information given to you (eg. verbally, written). given a file with all the rules and help info

10. Who is responsible for repairs or maintenance on your home/accommodation? What is the process of informing them? if a problem occurs must ring the dept of housing maintenance and they will appoint a contractor to fix

1. Have you had experience of requesting maintenance, and if so how did it work out? No

General questions for more comments:

11. What recommendations/ideas can you give that would help make rentals more accessible to people with disability? Change the building code so that all new constructions have features like wider level door frames installed and hidden disability features as standard in new buildings from a set date say 1st January 2021 it wouldn't change the overall price much as it would become the normal not special and that would increase the stock levels instantly, Increase the ratio of disability housing in Dept of Housing Stock,

Get the Department of housing to buy up buildings like the Wool Stores in Fremantle so they can build multi story units all with in the building and have lift access and maybe even a rooftop Garden and that way for the one building footprint you can create around 100 units all disability standards

12. Have you in the past, or would you consider, sharing a rental property? Yes i have shared but its hard with all my AT equipment lying around some people don't like that and then im often awake in the middle of the night for hours and it's hard to stay quiet

13. Have you ever boarded in someone's home? And what was your experience? Yes, was very hard with limited space and two different styles of living and eating

Any other comments:

Please allow grants from Indigo and Lotteries West and money from Ndis to be used in a rental property even though it may be not permanent for modifications and air con and insulation.

Change the building code/laws that all rental property have to fully insulated and make the law retrospective as well to cover the old buildings that landlords rent out for big money and don't fix the buildings that the poor person renting either is not allowed or can't afford to put in insulation and or can't afford to heat and cool the house to that lack of insulation

Your time in completing this questionnaire is appreciated.

Jill Mason
Consultant

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On behalf of PWdWA

Interview with Sebastian Kane, Service Co-ordinator, My Place

Accessibility of housing

- A high level of advocacy is required to help the individual or family with disability to obtain housing. When things go well it is because there is an advocate to help out
- “Still a lot of perceived stigma from real estate agents or private rentals regarding leasing to someone with a disability”. Visual disabilities can induce stereotypes where assumptions are made about capacity; there is a lack of understanding about disabilities from landlords.
- There is a theme of presupposition of people with disabilities wanting to live together; not recognising people are their own persons and may wish to live alone.
- Co-signing leases allows for a more equal power balance between residents. “An example of this is a co-resident situation where the person with disability lives with their co-resident/supporter are both on the lease and live their together. The fact they both signed the lease as anyone else would have. This can be more attractive to the landlord or agent. Having the knowledge that there’s a presence in the house that is providing the support and another name on the lease”.
- Limited supply of housing, particularly for those that need more modifications done such as hoists. Older homes or places with staircases reduces the supply.
- Houses that come already modified often come because there has been a family member or personal experience of disability by the landlord.

Affordability

- The private rental market is expensive for people with disability especially if they are on a limited income or pension. The result of this is isolation and social issues because of a lack of options in a location that might not otherwise be present in more affluent areas.

Appropriateness

- Appropriateness needs to look to the vulnerability of the person with a disability. For example, a single woman living in a high crime area.
- People with disabilities may be forced to stay in units with people that are predatory or could take advantage of them or higher crime rates.
- Often space around rental property is needed to allow for louder behaviours by people with disabilities.

Security of tenure

- Security of tenure needs to occur to make modifications worthwhile.
- Poverty approach can occur where people are unwilling to make needed modifications in the fear of damaging the rental, for example, putting up pictures.

Location

- Affordability affects location of rented properties: the result of this is that people who were already vulnerable because of the result of their disability are then at risk of increased isolation and socially at risk because of a lack of options. People with disabilities are then forced to stay in units with people that are predatory or live in higher crime rate areas.

Interview with Ian Burns, Business Development Manager, At Home Health

Accessibility of housing

- There are few accessible housing opportunities for people with disabilities out there, especially for people with quadriplegia.
- People with disabilities in their 20s 30s and 40s, who could live more independently, are still living with their families because there is no other option out there for them.
- An impediment to investors making their houses available to people with disability may be willingness to modify properties and how this is managed. If modifications do not add value to the property then an investor or landlord is unlikely to make this decision. "If they're going to have to make accessible toilets, there's going to be additional cost to that and the likelihood is there's going to be no return on investment for that." Concerns about who will pay for removal of modifications and the time frame for this, leading to loss of income between tenants is also an issue.

Affordability

- Compensable clients have greater affordability for rentals than funded clients through DSP. They have often received a big pay-out which can be enough to build what they need but it is not cheap.
- Not having the disposable income can affect people living with disability desire to move, as well as dealing with a new environment and make modifications.

Appropriateness

- Newer properties seem to be more suitable for people with disabilities. However, there are few flats suitable with wide doorways for people living with physical disability.
- A tension exists between what the person with disability requires, the funding of the modifications and whether the landlord will agree with that or not. This tension is not easy to overcome.

Security of tenure

- The majority of their clients with physical disabilities are in their own private accommodation or in Homeswest.
- A significant barrier to the security of tenure is behaviours of concern for neighbours, and these are usually found in people living with psycho-social disabilities rather than physical disabilities.

Location

- Affordability is low in Perth due to expensiveness of different regions. The outer suburbs are cheaper; inner-city options are usually out of reach because of higher expense. Those more central suburbs with available housing, such as in Maylands, are often in double story complexes which is not appropriate for wheel chair access.

Interview with Sarah Wilson, Director of Activelinc

Accessibility of housing

- The biggest issue is the availability of housing. It is almost non-existent for people with physical disabilities.
- NDIS fund core support, but not bricks and mortar. There are a lot of people on NDIS in inappropriate housing; they might be in a private rental but it is not necessarily physically accessible, for instance, with wide enough doorways.
- In situations such as discharge from hospital, the turn-around to get accessible housing is far from timely. It is a slow process to get adequate accommodation. For those with sudden changes to their ability to live independently, e.g. sudden decline in health, there is too long a wait period to implement their new plan. The current housing and rental environment does not cater well for the unforeseen-ness of health circumstances.
- The lack of available housing means that individuals need to be placed in unsuitable housing situations whilst they wait for instance with others of significantly different disabilities.
- SDA is new in WA and there is not yet a good understanding as to what they can offer people with disability and how their process can be facilitated. Providers need assistance to know what this process will look like externally and internally.

Affordability

- Accessibility of houses is dependent on disposable income to pay for rentals.
- Affordability of private rentals is a significant barrier to people with disabilities who want to live alone.

Appropriateness

- People with significant complex intellectual disabilities such as ASD cannot go into private rentals, as they require more robust accommodation, which is less likely to be damaged. Many are stuck in emergency accommodation for several years as there are issues with timing. The nature of the disability affects the ability to relocate.

Security of tenure

- People with psycho social disabilities might not be able to demonstrate their ability to manage their money and provide financial history to potential landlords. Even if their DSP can cover the rent, it is unlikely they will be considered equally with a person without a disability.
- There are difficulties for people with disability who regularly need to stay in hospital, resulting in their accommodation being vacant, but still incurring costs. They may be able to make rent but not maintain the property. Landlords may not wish their property to be tenanted but vacant for long periods of time.

Location

- For younger clients, having accommodation near their school is important
- Respite services and new accommodation may not be able to be in the same location.
- SDA is primarily South of the River, and there are not many available.
- Those with disabilities that need constant access to carers e.g. 24/7 care need to be able to be located within the access of a service provider. It is difficult to assist people to do this when there's not a lot available surrounding your location.

APPENDIX I – SURVEY MONKEY QUESTIONS

See attached PDF.