

Submission regarding the proposed Housing Australia Investment Mandate Direction 2018 (Amendment)

Submission by:

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About Vasey RSL Care:

Vasey RSL Care is Australia's leading provider of veteran-specific accommodation and support services, including affordable and social housing for veterans and war widows/widowers, and transitional housing for veterans experiencing or at risk of homelessness.

As an ex-service organisation, Vasey RSL Care operates as private organisation under a Patriotic Fund, regulated through Consumer Affairs Victoria (CAV) in accordance with Victoria's *Veterans Act 2005*. The Patriotic Fund has the primary focus of addressing the unique needs of ex-service community members, particularly acute housing needs. Vasey RSL Care's mission revolves around offering highly subsidised housing solutions to meet the needs of veterans and their families, and we have been doing so since our organisation's inception in 2004, with our roots tracing back over 100 years.

Currently, Vasey RSL Care owns and manages around 300 one- and two-bedroom dwellings across metropolitan and regional Victoria, and we have ambitious plans outlined in our strategic plan to expand our accommodation stock further by 2025. In the last few years, we have significantly increased our affordable housing offerings for veterans and their families, demonstrating our commitment to addressing the pressing issue of housing affordability and availability for the ex-service community.

In response to the Exposure Draft of the proposed *Housing Australia Investment Mandate Amendment (Social Housing, Affordable Housing and Acute Housing Needs) Direction 2023*, there are two key areas that I wish to highlight on behalf of Vasey RSL Care.

Organisation status for eligibility:

While the Exposure Draft does not limit eligibility solely to registered housing providers, we would like to see the Direction clearly stipulate that all funding options be accessible to eligible non-registered housing providers, including those under Patriotic Funds.

While Vasey RSL Care is a member of the Community Housing Industry Association (CHIA), we face a unique challenge when it comes to becoming a registered housing provider. Our status as a Patriotic Fund in Victoria requires the organisation to have a specific wind-up clause arrangement as mandated by our constitution. In the event of dissolution, all proceeds must be transferred to the trust within the Patriotic Fund, enabling the distribution of these assets to other Patriotic Fund organisations to meet the needs of the ex-service community.

For background, the contradiction arises when we consider the requirements for becoming a registered housing provider. Such registration necessitates that, in the event of dissolution, all assets and proceeds must be transferred to another affordable housing provider. This requirement directly conflicts with our constitution's mandate, creating a bureaucratic hurdle that impedes our ability to access government funding to expand our housing initiatives if such funding is restricted only to registered housing providers.

It is important to note that Patriotic Funds in Victoria fall under the purview of the Victorian Minister for Veterans and are administered by Consumer Affairs Victoria (CAV). While we understand the importance of ensuring the perpetuity of funds provided by the Government for housing initiatives, we believe that the structure of Patriotic Fund provides similar protections around perpetuity.

Eligible project proponents for funding:

We appreciate the addition of section 28F(1)(h) and 28S(1)(h) in the Exposure Draft which indicates an intention for projects supporting housing outcomes for members of the Australian Defence Force to be eligible under the HAF and NHAF respectively.

**28F(1)(h)*

(h) an entity that is a constitutional corporation and has the primary purpose of improving, directly or indirectly, housing outcomes for members of the Australian Defence Force; or

**28S(1)(h)*

(h) an entity that is a constitutional corporation and has the primary purpose of improving, directly or indirectly, housing outcomes for members of the Australian Defence Force; or

For the benefit of clarity and to ensure that all relevant individuals are covered, we strongly recommend further clarification regarding the inclusivity of this term 'members of the Australian Defence Force'. Specifically, we believe that the Direction should explicitly state that this clause includes not only current serving members of the Australian Defence Force but also veterans and their families.

We note that the Explanatory Statement makes direct reference to housing solutions for veterans in need, however the Exposure Draft is not this explicit, and we recommend including this language within the Direction to ensure the policy intent is formalised to include veterans and their families. Recognising this broader perspective would align with the Government's overarching goal of improving housing outcomes for all those who have served in the Australian Defence Force and remove any ambiguity for organisations like Vasey RSL Care so that we may access funding to better support those in the ex-service community in need.

Additionally, clearly recognising veterans and their families in the Direction addresses a demographic gap that exists in the provision in the State's public and social housing. Veterans are not considered a priority group for the allocation of State housing despite veterans being almost three times more likely to experience homelessness than the general

population. This gap in provision of mainstream housing support results in not-for-profit and ex-service organisations struggling to meet the needs of this demographic, with a constant flow of veterans requiring assistance. It is essential that the Direction is worded in a manner that allows housing to be funded for this purpose through providers who specialise in support for the ex-service community, especially with research showing that veterans are more likely to seek out support from an ex-service organisation than a mainstream provider.

Conclusion:

The current funding mechanism for non-government organisations is heavily oriented towards large, registered housing providers, which risks exclusion of organisations like Vasey RSL Care from accessing essential funding to contribute to increasing social and affordable housing stock for those most in need. A more inclusive funding structure would harness the full capacity of experienced and trusted providers including those with Patriotic Fund status, and ensure broader reach and effectiveness.

Furthermore, including a clear statement that project proponents may include constitutional corporations with the primary purpose of improving, directly or indirectly, housing outcomes for serving *and veteran members* of the Australia Defence Force *and their families*, will ensure the full intention of funding for housing for this key demographic can be achieved.

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