FAITH HOUSING AUSTRALIA

Submission to inform the Homes for NSW Plan
January 2025

Homes designed by member Stanton Dahl Architects

About

Faith Housing Australia (FHA) stands as the peak body representing the diverse and dedicated faith housing sector. Our members include faith-based organisations, not-for-profit Community Housing Providers (CHPs) supporting over 62,700 tenants, and Specialist Homelessness Services (SHS) assisting more than 83,800 clients. Many of these organisations boast centuries of unwavering commitment to community support.

Additionally, our professional members include organisations such as planners, architects, project managers, developers and other enabling entities crucial to housing delivery.

Our network also includes places of worship across all faiths committed to utilising their land for housing justice, as well as faith leaders from all religions and denominations who view housing as a cornerstone of social justice and a fundamental human right.

The faith housing sector is a vital contributor to the housing supply in NSW, delivering specialist homelessness services and housing across the continuum. Housing is the essential foundation of our work, but our support extends far beyond providing shelter. Our members offer a comprehensive array of services, including emergency relief, financial counselling, mental health support, and employment assistance. Members' specialised supports cater to people with disabilities, survivors of domestic violence, young people in out-of-home care, and individuals overcoming addiction, ensuring holistic care for those in need.

Our member organisations have a significant presence across Australia, addressing housing needs nationally with the support of over 57,000 staff and more than 40,000 volunteers. Members are long-term partners with local communities, working to identify and address gaps in support services, tackling crises such as natural disasters alongside the community and empowering them to achieve long-term positive change.

FHA is dedicated to partnering with the NSW Government to meet the urgent demand for more non-market housing and to provide the essential support needed to sustain tenancies and break the cycle of homelessness.
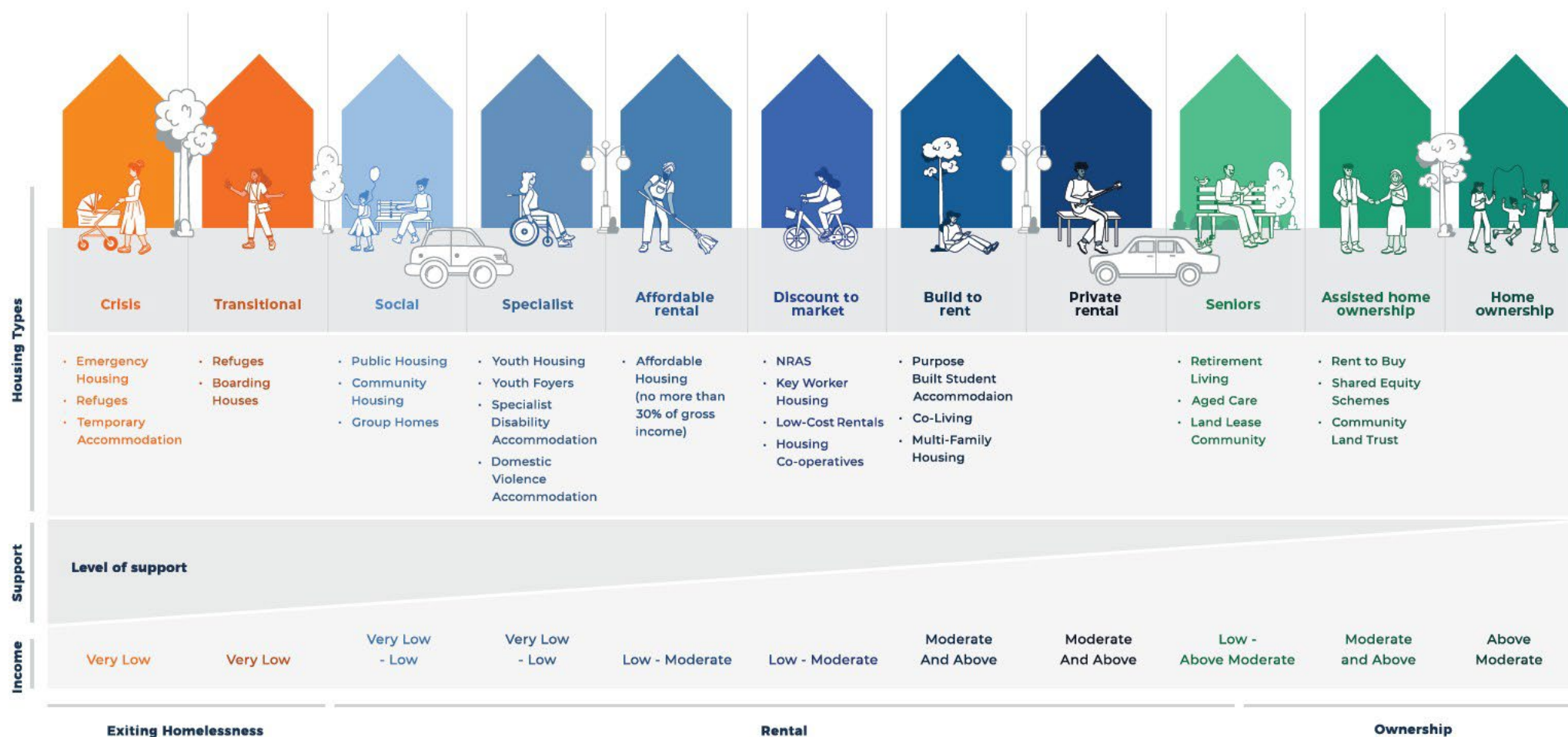
	Crisis	Transitional	Social	Specialist	Affordable rental	Discount to market	Build to rent	Private rental	Seniors	Assisted home ownership	Home ownership
Housing Types	• Emergency Housing • Refuges • Temporary Accommodation	• Refuges • Boarding Houses	• Public Housing • Community Housing • Group Homes	• Youth Housing • Youth Foyers • Specialist Disability Accommodation • Domestic Violence Accommodation	• Affordable Housing (no more than 30% of gross income)	• NRAS • Key Worker Housing • Low-Cost Rentals • Housing Co-operatives	• Purpose Built Student Accommodaion • Co-Living • Multi-Family Housing		• Retirement Living • Aged Care • Land Lease Community	• Rent to Buy • Shared Equity Schemes • Community Land Trust	
Support	Level of support										
Income	Very Low	Very Low	Very Low - Low	Very Low - Low	Low - Moderate	Low - Moderate	Moderate And Above	Moderate And Above	Low - Above Moderate	Moderate and Above	Above Moderate
	Exiting Homelessness				Rental					Ownership	

Diagram: FHA Housing Continuum – members provide housing across the continuum in response to need.

Introduction

The current landscape presents a significant opportunity for transformative change in NSW's non-market housing and homelessness system, driven by the alignment of political will, the establishment of Homes NSW, increased funding, and the community's growing needs - particularly for people on low incomes. This convergence of factors provides a unique moment to address long-standing issues and improve housing outcomes for many of the state's most vulnerable citizens.

Despite these positive developments, there remains a significant shortage of non-market housing relative to demand. Ageing housing stock is often poorly aligned with the community's needs, exacerbating the shortage of suitable housing for larger families, individuals with disabilities, or older tenants who require accessible features.

Example
Member **Uniting NSW.ACT**'s Families Report 2024[i] demonstrated that some family structures, including multigenerational and step-blended families were acutely impacted by affordable housing shortages.

This mismatch highlights the urgent need for strategic planning and investment to ensure that non-market housing can adequately meet the diverse needs of its customers.

NSW boasts arguably the most robust and developed community housing sector in the country, a testament to sustained investment by successive NSW Governments. This strong foundation provides a solid platform for further advancements in non-market housing. Leveraging the strengths of community housing providers (CHPs), alongside new initiatives and funding, can drive meaningful improvements and ensure that the non-market housing and homelessness system is both effective and sustainable.

FHA's submission outlines the opportunities and risks associated with implementing the proposed reform priorities and makes recommendations to support Homes NSW's partnering with FHA members in shaping an effective, multi-provider system.

FHA commends Homes NSW's ambitious reform agenda and collaborative approach in working with peaks and system partners.

Context and scope of the Plan

The scope of the Homes for NSW Plan (the Plan) is too narrow if it only considers the activities of Homes NSW without considering interdependencies with other NSW agencies, primarily the Department of Planning, Housing and Infrastructure (DPHI). Currently, the Plan overlooks critical elements that shape the housing landscape and fails to leverage the full potential of government resources and expertise. Including DPHI is essential because its policy initiatives and reforms significantly influence the operating environment for Community Housing Providers (CHPs).

Example
Successful Housing Australia Future Fund (HAFF) projects from members have been impacted by delays to the low-and-mid-rise (LMR) reforms, which were indicated for implementation by the end of 2024. This has reduced yield for successful sites within 400m of train stations.

A comprehensive approach to housing requires a whole-of-government strategy encompassing the private market, the use of the planning system, financial incentives, and non-market housing. The *NSW Homelessness Strategy* is appropriately framed as a whole-of-government endeavour, and the same approach should be applied to the Plan. A broader scope will ensure that housing policies are cohesive and capable of effectively addressing the community's diverse needs.

FHA recommends that the final Plan should ensure:

- **identification of interdependencies with legislation, policy and strategy of other NSW agencies, including, but not limited to, planning, health, mental health, tenancy laws and corrective services**
- **strategic alignment between NSW Government priorities such as, but not limited to, NSW Treasury's *Performance and Wellbeing Framework***
- **integration with Homes NSW's strategies, including the *NSW Homelessness Strategy* and *Strong Family, Strong Communities* – while these are indicated as relevant in the draft Plan, their goals and targets should be integrated into the final Plan, to ensure progress and alignment within Homes NSW**

Draft vision and priorities

Vision

The Plan's timeframe is appropriate to outline a system-wide vision shaping the next 10 years. By setting a long-term vision, the Plan seeks to create a sustainable and inclusive housing system that can adapt to future challenges and opportunities.

Having been engaged in earlier consultations, FHA appreciates the revised draft vision for the non-market housing system presented in the discussion paper; *'Everyone has access to a decent home and support if they need it'*.

However, the phrase '*decent home*' sets a low benchmark for customer expectations. FHA recommends the phrase '*suitable home'* to better reflect a customer's needs being factored into both the initial matching and periodic reviews of whether a property continues to meet a customer's changing needs.

FHA recommends that the final vision:

- **clearly define 'everyone' – does this mean all NSW citizens or people accessing non-market housing?**
- **reflect a customer-centric approach in the descriptors used**
- **reflect performance standards such as dwelling and service standards to be incorporated in the final Plan**

Priorities

The three reform priorities—customer-driven service, more and better homes, and a system that works—are also the result of extensive feedback and listening sessions with representative peak bodies, CHPs, Specialist Homelessness Services (SHS) providers, and tenants. The three priorities are broad enough to encompass Homes NSW's ambitious reform agenda and are specific enough to focus action over the life of the Plan.

Priority 1: Customer-driven service

Opportunities

- **Enhanced Service Delivery:** By involving customers in service design and decision-making, services can be better tailored to meet their needs, leading to higher satisfaction and better outcomes.

- **Increased Engagement:** Developing a Community and Customer Engagement Strategy can foster stronger relationships between service providers and customers, ensuring that feedback is continuously integrated into service improvements.

- **Streamlined Processes:** Simplifying the application and appeals processes can reduce barriers for vulnerable individuals, making it easier for them to access necessary services.

- **Recognising Expertise:** Specialist providers and those with specific cultural competence or long-term experience serving particular communities should be recognised as experts, regardless of their size/scale.

Risks

- **Implementation Complexity:** Ensuring consistent and fair outcomes across a diverse customer base can be challenging, particularly when dealing with different types of housing and support needs.

- **Resource Constraints:** Adequate funding and resources are required to support enhanced engagement and streamlined processes, which may be difficult to secure.

- **Undervaluing Community Perspectives:** Organisations alone do not produce outcomes, rather, they are coproduced by people, communities and organisations working together.

FHA Recommendations for Priority 1

1. **Provide role clarity**
   The current system and the Plan would benefit from clarifying providers' roles within the system and clearly defining unspoken assumptions.
   - Defining what a 'good social landlord' looks like and is responsible for is essential to providing a consistent customer experience across public and community housing as a foundation for realising customer-driven service
   - The separation of roles between tenancy management and support providers is an assumption of previous reforms and should be clarified.

Example
Members delivering housing under the Social and Affordable Housing Fund (SAHF), including **Anglicare Sydney, BaptistCare, Uniting NSW, ACT, and St Vincent de Paul Society Housing Australia/Vinnies NSW,** with internal capability for both tenancy management and casework specialisation, have successfully delivered housing and support, facilitating separate roles and relationships with tenants from within the same organisation.

2. **Establish definitions and review waitlist, allocation and customer-facing policies**
   FHA members are broadly supportive of initiatives to streamline application processes for customers and establish definitions to support the efficient functioning of the non-market housing system. Two areas requiring definition in the final Plan:
   - Affordable Housing - anticipating the release of revised *Affordable Housing Ministerial Guidelines*, FHA supports a definition of affordable housing being implemented in NSW (if a national agreement on a definition is not possible).
   - Essential Worker Housing – FHA and members have made recommendations to the *Essential Worker Housing Inquiry* that the state adopt an inclusive definition of essential workers in NSW housing policy to ensure all critical roles are recognised. This includes, but is not limited to, care and support workers in disability services and aged care, early childhood educators and a broad range of roles critical to the health, development and social cohesion of communities in NSW.

Following establishing these definitions, customer-facing policies should be reviewed, such as ending lease reviews, so that essential workers are able to remain in affordable housing and serve their community (knowing they will move on when circumstances allow and their needs change).

3. **Develop and implement a Customer Service Charter**

There is a perceived gap between service experiences in public housing versus community housing, leading to inconsistent customer experiences and expectations and contention around customer service data, particularly satisfaction scores. This could be resolved by implementing a Customer Service Charter developed in consultation with peaks, service partners and customers. The *NSW Fair Trading Customer Service Charter* is an example already in place in NSW[ii].

4. **Develop and resource a tenure-neutral approach to support**

Other than current provisions of specific programs, such as the Social and Affordable Housing Fund's tailored coordinated support, a new approach to support is required to deliver on the second part of the Plan's vision *'…and support if they need it'*.

As a consistent pillar in FHA's advocacy, we recommend that the Plan should:
- Frame support as a critical component for customers of the housing system to both sustain tenancies and prevent homelessness, in line with Housing First principles
- Implement an approach that delivers flexible, scalable, individualised support respectful of personal choice and autonomy
- Apply a broad scope for tenure-neutral support across the housing continuum i.e. Support is equally relevant to people with very high support needs as it is to wealthy households who own their own home (noting the main differences in the types of support required and the capacity of the household to pay the cost of their delivery – refer to tapered supports in *Diagram: FHA Housing Continuum*)
- Undertake research to uncover the formal and informal structures currently accessed by customers and delivered by providers to fill this gap
- Seek funding commitment from the NSW Government for support as an essential and complementary investment to the capital investment made into non-market housing
- Resource the time-intensive role of support coordination by providers to assist customers in accessing relevant services (far more than simply making referrals)

FHA member research adds to the evidence base

A study by ACIL Allen for **BaptistCare** suggests a three-fold social return on investment (including a range of health, wellbeing, economic, employment and other social benefits) for safe and secure living combined with wrap-around tenant support services.[iii]

Mission Australia's Michael's Intensive Supported Housing Accord (MISHA)[iv] research project supported men experiencing chronic homelessness to enter and sustain permanent housing. The model comprised three parts: access to long-term housing, assertive case management and provision of mental, physical and social supports. If cost offsets from tenancy failures were avoided ($2,400 per client) and the use of crisis/emergency accommodation was reduced ($6,427 per client), the program would be cost-neutral in three years.

Research by the University of New South Wales Social Policy Research Centre[v] highlights the significant improvements in wellbeing among tenants of **St Vincent de Paul Society Housing Australia**'s (SVdPSHA) Social and Affordable Housing Fund sites. Researchers noted that overall, SVdPSHA's tenants scored 87% to 90% satisfaction over time, with tenants valuing highly the package of housing and tailored coordinated supports offered.

5. **Provide equal access to systems**

System access should be provided equally to ensure a consistent customer experience across the system, potentially reducing waitlist time and the administrative burden on providers. This principle should also be a part of the design of future systems.

Example

Tier 1 and large Tier 2 CHPs are currently the only providers who can make housing offers directly from Housing Pathways. This means priority waitlist applicants to the NSW Housing Register are not 'top of the list' for all CHPs and may be waiting longer, and prospective customers share their details multiple times.

This also adds an additional administrative burden to the Tier 2 and all Tier 3 CHPs without access and Support Providers who need to:

- contact all referral partners and seek applications from them
- referral partners fill in a provider's application for housing form
- CHP assesses the application, including confirming with the Support Provider that the applicant is listed on Housing Pathways
- applicant is made an offer for housing.

The time-consuming process required of CHPs without at least view access to Housing Pathways also impacts performance targets.

Priority 2: More and better homes

Opportunities

- **Increased Housing Supply:** The *Building Homes for NSW* program aims to deliver 8,400 new social homes and upgrade 33,500 existing homes, a significant investment and important first step in addressing the urgent need for more housing.

- **Quality and Sustainability:** Emphasising well-maintained, quality homes that are environmentally sustainable can improve living conditions, reduce long-term costs, and help break the stigma associated with non-market housing.

- **Aboriginal Housing:** Increased support for Aboriginal housing providers and the focus on self-determination can enhance culturally appropriate housing solutions.

- **Modern Methods of Construction:** Cost-efficient housing delivery that can introduce innovative building techniques and reduce construction times.

Risks

- **Funding and Resource Allocation:** Ensuring sufficient and sustained funding to meet ambitious housing targets. Despite recent record levels of investment, available funding is insufficient to meet community need. Funding opportunities for Community Housing Providers are currently unclear.

- **Construction Delays:** Building new homes and upgrading existing ones can face delays due to regulatory, logistical, or supply chain issues and price increases.

- **Community Integration:** Ensuring new housing developments are well-integrated into existing communities and have access to necessary services and infrastructure is crucial for their success.

- **Vulnerable Populations:** Failing to recognise cohorts, such as young people and victim-survivors of domestic violence, that require a specific housing response, as evidenced in research.

- **Cultural Relevance:** Ensuring housing and homelessness services are delivered in a culturally competent manner. This includes community engagement and designing and managing housing that is sensitive to cultural practices, values and needs.

FHA Recommendations for Priority 2

1. Restore the social housing safety net to 10% of NSW housing by 2050

FHA recommends setting an initial target to restore the social housing safety net to 5% and then increasing the target to 10% of all housing stock. With net households in social housing increasing by 2,366 between 2018 and 2023[vi], rebuilding stock and seeing the impact on the waiting list will take time. In the interim, we accept that positive changes to streamline the application process for customers may increase waiting list numbers. However, these are essential steps towards reforming the non-market housing system.

Targets should be informed by a comprehensive data-driven needs analysis (not just an analysis of expressed needs, such as Housing Pathways data), with targets broken down by region and linked to place-based strategies responding to local needs.

Housing Australia conservatively estimates 132,600 households (or 4.6% of total NSW households) are experiencing housing need[vii]. Without significant, sustained investment in social and affordable rental housing, housing need across NSW is predicted to reach 320,700 households by 2041[viii]. Responding to the scale of NSW's housing emergency will require significant and sustained investment from the NSW and Commonwealth Governments to meet demand and future need, as is acknowledged in the discussion paper.

2. **Provide a level playing field and opportunities for providers of all tiers AND recognise organisational capacity beyond Tier status**

   Programs and partnership opportunities prioritise growth for Tier 1 providers, constraining growth opportunities for Tier 2 and 3 providers. The current system is shaped for pureplay CHPs. It does not recognise system partners' strengths and unique resources, such as faith-based organisations/CHPs, Aboriginal CHPs and Aboriginal Community Controlled Organisations.

Example

CHP Tier status allocated by scale, scope and level of risk does not recognise organisational capacity and strengths such as:

- where a provider might be the culturally appropriate provider to meet community need
- where a provider (or their parent organisation) has specialist expertise in working with a target cohort, e.g. young people or victim-survivors of domestic violence, which may make them a provider of choice for a specific program
- where a provider has unique resources, such as land, a network of community services or volunteers, that could multiply the impact
- where a provider has existing community connections/where organisations have organisational capacity/experience in a particular region.

Program design and RFT processes should incorporate a strengths-based methodology, place-based approaches and cultural competency, and ways to unlock potential in existing social infrastructure and community resources should be considered.

Similar considerations for SHS providers should be applied within the *NSW Homelessness Strategy*, particularly where proposed regional alliances will shape a local response, and local knowledge and experience should be valued.

3. **Forge partnerships to leverage non-government, institutional and community resources to increase the supply of social and affordable housing**

   Greater flexibility in procurement and funding is required to unlock resources from faith-based CHPs, faith-based organisations, faith groups, ACHPs, institutions, councils and other community organisations.

   Programs like the Community Housing Innovation Fund (CHIF) demonstrate the potential for partnerships to deliver social and affordable dwellings[ix]. However, additional pathways and mechanisms are required to realise this potential, such as a solution to resolve the divided property issue where land is held in trust.

   FHA also anticipates Homes NSW's revised direct dealing policy, which will expand its remit to consider land beyond LAHC-owned land, including faith-owned land, as part of potential transactions.

   Below are two examples where policy and funding constraints limit such partnerships' potential.
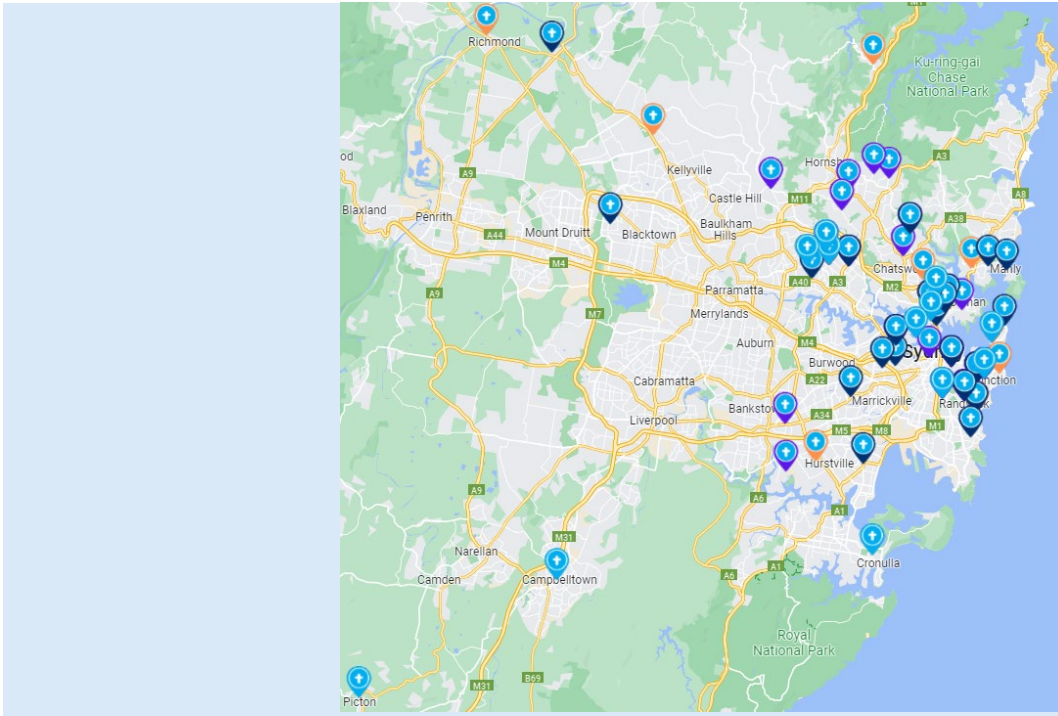
Example

Faith-based sites, such as places of worship, are some of the best-located sites across NSW in terms of access to public transport, education, jobs, and services. FHA's research identified 2,424 parcels of land with self-identified places of worship across NSW; 747 sites are located within 800m of a train station, with the potential for 20,000 new dwellings solely within the Sydney metropolitan area.

Faith-based organisations are keen to play a significant role in providing new, well-located homes to help solve the current housing crisis across NSW. Yet, they are hampered by zoning constraints that prevent the use of many sites for integrated faith and housing developments, particularly for the delivery of social and affordable housing.

FHA recommends expanding permissible uses in 'SP2 – Place of Public Worship (and/or Education and/or Infrastructure)' zones to unlock the potential for housing supply across NSW.

Sydney Anglican Property

There are 85 sites within the portfolio of parish properties owned by the Sydney Anglican Diocese with SP2 zonings, which are conservatively able to deliver 4,000 dwellings.

Beyond land, other resources could be repurposed to provide homes for priority cohorts.

Example
Older women (aged 55 years and over) make up 17% of all people experiencing homelessness in NSW and were the fastest growing group among the homeless or at risk of homelessness, increasing 31% since 2011[x].

FHA members are also large providers of seniors' housing, and with many ageing and underutilised retirement living villages in NSW, they could be supported in converting their stock into low-cost rentals/affordable housing for seniors over 55. More than 70 possible sites across FHA members have been identified. In many cases, these homes are on larger sites providing aged care and support, and they could provide access to additional amenities and strong community connections.

Uniting NSW.ACT – Repurposing retirement villages for rental housing
A growing component of Uniting's long-term housing strategy is to create more affordable housing for seniors by increasing the number of homes available for low-cost rental. In a first-stage trial, 245 units were converted to rentals, with a potential of 1,367 independent living units being considered.

4. **Support NSW CHPs to leverage Commonwealth funding**
24% of successful projects in HAFF Round 1, or 3,266 homes, will be delivered in NSW, with VIC outperforming to deliver 30% or 4,135 homes.

NSW could achieve greater success from future HAFF rounds (Round 3 indicated mid-year 2025) by supporting bids from CHPs to deliver social and affordable housing in line with Housing Australia's success criteria, evident in Round 1.

FHA members' unsuccessful Round 1 bids due to significant oversubscription in HAFF Round 1, many of which contributed well-located faith-owned land, had the potential to deliver more than 1,000 social homes and nearly 500 affordable homes.

Upfront grant funding would enable CHPs to layer financing with Housing Australia's concessional loans and availability payments.

This approach is supported by AHURI's modelling of investment scenarios, which demonstrates that capital grants combined with efficient financing are the most cost-effective pathway for governments[xi].

Priority 3: A system that works

Opportunities

- **Integrated Services:** Creating a more integrated and flexible system can improve coordination between different parts of the housing and homelessness sector, leading to more effective service delivery.

- **Partnerships and Collaboration:** Strengthening partnerships with non-government organisations, community groups, and other stakeholders can enhance the overall capacity and responsiveness of the system.

- **Governance and Accountability:** Implementing effective governance structures and clear accountability measures can ensure that reforms are implemented efficiently and transparently.

Risks

- **Systemic Complexity:** Overhauling the existing system to make it more integrated and flexible can be complex and time-consuming, requiring significant changes to policies and procedures.

- **Stakeholder Alignment:** Achieving alignment among diverse stakeholders with different priorities and interests can be challenging. Taking time to consult and engage with stakeholders with unique resources and specific expertise is time-consuming but essential.

- **Sustainability:** Ensuring that reforms lead to long-term financial and operational sustainability requires careful planning and ongoing evaluation.

FHA Recommendations for Priority 3

1. ***Ensure an integrated approach within Homes NSW's strategies, including the final** Homes for NSW Plan, NSW Homelessness Strategy and Strong Family, Strong Communities*
   At present, there is a disconnect between housing and homelessness priorities and strategies, which under Homes NSW can be united for greater effect.

   Many of FHA's members are both CHPs and SHS providers and see the significant opportunity to harmonise strategies that both focus on having people housed sustainably and providing support to prevent cycles of homelessness.

   Aligning the 'sub-markets' of homelessness and social housing, which is not sufficiently conceptualised in the discussion paper, could also achieve solutions and efficiencies.

2. **Reinforce a collaborative approach to governance, measurement and partnership**
   FHA commends Homes NSW for their collaborative approach and encourages this commitment to continue and deepen to underpin the successful implementation of reforms across its different strategies, including the final Plan.

   To make collaboration and consultation more effective, FHA recommends Homes NSW to:
   - Build in longer timeframes for consultation; we appreciate the urgency and ambition for reform, but the short timeframe for consultation on the Plan over the holiday period was challenging
   - Consult with a broader group of stakeholders than just pureplay CHPs and representatives. FHA is committed to supporting Homes NSW wherever possible to make the voices of faith-based CHPs and SHS providers heard. e.g. only pureplay CHPs were included in the formal consultation to revise Homes NSW direct dealing policy run by external consultants, despite faith-based CHPs having land resources that this revised policy will open up
   - Consider the impact of concurrent reforms within Homes NSW, where the same participants need to manage multiple streams of work e.g. *Homes for NSW Plan, NSW Homelessness Strategy*, SHS Recommissioning

3. **Support CHPs to take a portfolio approach**

Policy settings supporting CHPs to take a portfolio approach could deliver improved utilisation and operational flexibility.

Members have expressed a desire for increased flexibility to realise housing first principles and keep people connected to community/local supports where they have established themselves. The current approach, with specific dwellings tied to different supported housing programs, necessitates customers physically moving dwellings as they transition between support programs. Each move adds the potential for a breakdown in housing and critical supports sustaining a tenancy.

Members also appreciate the regulatory complexity that may come with such a policy change but would prioritise the potential benefit to customers' housing outcomes. Although this idea has been raised a number of times in the past members recognise the present authorising environment is one where innovative 'blue sky thinking' is possible.

Example

Under SAHF, **Anglicare Sydney** delivered 550 homes focused on an older cohort over 55, with new homes adjacent to existing retirement living and aged care facilities. These social homes benefit from the added amenities available in the village setting, such as community/lifestyle facilities and access to medical care staff. The homes also support ageing in place, and as needs increase, the opportunity to stay connected to social supports and receive additional services or move into a higher care setting is available. This is an example of achieving improved wellbeing, housing outcomes and social equity through a type of portfolio approach.

4. **Prioritise prevention strategies and recognise the essential nature of crisis responses**

CHPs and SHS providers alike desire the system to be shaped to prioritise prevention and early intervention strategies that minimise instances of homelessness and preserve tenancies. Providers are also broadly supportive of Homes NSW's approach to investing in capital solutions that build the long-term capacity of the non-market housing system.

There is also concern that, given our present economic circumstances, with worsening housing affordability and rental and mortgage stress, **planning to scale back crisis responses during the Plan's term is premature**. The scale of the housing emergency across the state will require additional investment so that crisis services can be maintained and likely increased, and significant investment to scale up long-term housing options rapidly can be prioritised simultaneously. Forecasting savings in crisis responses to fund long-term housing in the next ten years is unrealistic and will lead to further dysfunction in the housing system and limit progress towards targets.

5. **Effectively mapping the non-market housing system should include unaccredited and informal community supports**

Many essential services accessed by people in housing need are outside Homes NSW's accredited and funded provider networks but play a critical role in responding to community needs, such as food banks, financial support from charities, local homelessness responses from community groups such as churches and volunteer services.

Mapping and understanding these community resources is essential to building an accurate picture of the non-market housing system and are stakeholders that Homes NSW should consider as part of the broader system. Many of these networks demonstrate their value rising to meet increased community needs during natural disasters and health emergencies like the COVID-19 pandemic. FHA members and related entities provide many informal services to help build community resilience and wellbeing and reduce isolation.

6. **Review industry councils and resource industry development schemes to promote community housing growth**

Establishing a new 10-year vision is also a helpful time to review the purpose and membership of groups like the NSW Community Housing Industry Council (CHIC) to ensure that a diversity of providers is represented. Additional representation could further support the growth of faith-based CHPs, ACHPs, and ACCOs.

The Community Housing Industry Development Scheme (CHIDS) continues to be a very effective initiative. Increased resourcing could help support industry development and reforms implemented in the Plan, further demonstrating the government's commitment to building the capacity of CHPs.

7. **Fund housing peaks appropriately as a key strategy underpinning the Plan's success**
   Peaks are key partners for government, driving strategic leadership and research, providing systemic policy advice, engagement and advocacy and building the capability and capacity of the partners in the non-market housing system. Funding peaks appropriately is fundamental to a *system that works*.

Conclusion

The *Homes for NSW Plan* must tackle critical gaps and foster collaboration to achieve transformative change in NSW's non-market housing and homelessness system. FHA emphasises the need for a broader scope, strategic alignment with NSW Government priorities, and integration of Homes NSW's strategies.

FHA's recommendations across the three reform priorities—customer-driven service, more and better homes, and a system that works—outline opportunities and risks associated with implementing the proposed reform priorities and makes recommendations to support Homes NSW's partnering with FHA members in shaping an effective, multi-provider system.

To increase housing supply and improve living conditions, the Plan should aim to restore the social housing safety net to 10% of NSW housing by 2050, provide a level playing field for providers of all tiers, and forge partnerships to leverage non-government, institutional, and community resources.

The Homes for NSW Plan's success hinges on its ability to foster collaboration, address systemic complexities, and ensure long-term financial and operational sustainability.

Faith Housing Australia is committed to working closely with Homes NSW to realise these goals and ensure a more inclusive, sustainable, and effective non-market housing system for NSW.

Contact
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FHA Member Organisations