

Policy: Strategic Tenant Relocations

NSW Land and Housing Corporation

December 2020

Summary: This policy will guide the Land and Housing Corporation's (LAHC) approach to strategic relocations of tenants living in LAHC-owned properties. The policy recognises and responds to the need to balance tenant and asset portfolio considerations to support more quality social homes to be available to those who need them.

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1 Purpose

1.1 Purpose

This policy:

- supports Land and Housing Corporation's (LAHC) to implement the [LAHC Portfolio Strategy](#) (2020).
- guides LAHC's approach to strategic relocation of tenants living in LAHC-owned properties managed by the Department of Communities and Justice (DCJ), community housing providers (CHPs), the Aboriginal Housing Office (AHO) or mainstream or Aboriginal Community Housing Providers (A/CHPs) (noting each organisation may have complementary relocations or other policies which need to be balanced).
- sets out the principles and processes for strategic relocations.
- recognises that to suitably house as many families as possible, LAHC needs to manage and optimise its portfolio whilst balancing the needs and interest of tenants.
- provides clarity about the purpose of strategic relocations and the circumstances in which LAHC will require strategic relocations to be planned, required and implemented.

The policy aims to:

- enable strategic relocation of tenants to support achievement of LAHC's Portfolio Strategy and any local government area (LGA) strategy objectives. These include:
 - building and delivering more homes than LAHC sells
 - reducing under-occupancy
 - reducing maintenance and disability modification costs to older homes
 - divesting properties which are not fit for modern use as social housing (such as older or larger properties, properties requiring major repairs, properties with bushfire, flooding, sea level rise, heritage or conservation constraints which make them costly and hard to modify to meet tenant needs and/or not suitable for redevelopment).
- ensure tenant needs and interests are respected and accounted for in planning and implementing strategic relocations.
- provide transparent information for tenancy managers and tenants.
- guide tenancy managers to implement more strategic relocations.

1.2 Operating Context

LAHC owns and manages the NSW Government's mainstream social housing portfolio.

It is Australia's largest social housing portfolio, but it includes many older homes which are reaching the end of their useful life and are not fit for modern use. It is not meeting the needs of current tenants, waitlist demand exceeds and is mismatched to supply.

LAHC seeks to ensure it positions the NSW Government's mainstream social housing portfolio to meet the current and future needs of eligible social housing tenants.

LAHC operates within the Department of Planning, Industry and Environment (DPIE).

Under an agreement which reflects aspects of the [Housing Act 2001](#), DCJ manages the majority of LAHC's social housing tenancies.

Under lease, CHPs also manage tenancies for LAHC.

1.3 Policy Context

1.3.1 Future Directions

[Future Directions for Social Housing in NSW](#) (Future Directions) is the NSW Government's 10 year vision for the social housing system to 2025. It is the primary Government policy guiding LAHC's planning, decision making and activities.

A strategic priority for Future Directions is to grow social housing supply, including through redevelopment and renewal of properties that are not fit for modern use.

Growing and changing the social housing portfolio will allow LAHC to house more vulnerable people and families in better designed and quality homes and improve its financial sustainability (as a self-funded housing provider). This will benefit the wider social housing system.

1.3.2 LAHC Portfolio Strategy

LAHC's [Portfolio Strategy](#) (2020) sets out the vision and priorities to grow and change the LAHC portfolio over the next 20 years. It provides direction for the sort of homes LAHC will own and build into the future. They will be fit for modern use and well maintained quality homes, planned and designed to meet changing needs.

Strategic relocation of tenants is a critical enabler of new and better social housing, and housing more families more suitably.

Relocations create opportunities to 'right-size' who lives where – so more people and families can be housed in suitably sized, fit for modern use, modified and accessible, and better located accommodation while optimising utilisation of LAHC's portfolio.

In 2020, at least 15,000 (around 15%) LAHC-owned homes are under-occupied by two or more bedrooms (this excludes Aboriginal families where the extra bedroom policy is applied).¹

¹ This figures applies to DCJ-managed homes.

Based on the NSW Housing Register, and the profile of current tenancies compared to LAHC stock, LAHC has a large proportion of three bedroom homes, while the majority of households on the NSW Housing Register have identified as needing one and two bedroom homes.²

Larger homes cost more to maintain and attract higher council rates, yet if they are under-occupied rental income can be significantly lower than market rents. This leads to LAHC needing to sell homes to cover costs, which reduces the amount of social housing it can supply and the number of households housed.

While better matching households to home configurations might be seen as 'tenancy management', for LAHC it is a contributor to 'portfolio and asset management'.

When people and families are best matched to their homes, the portfolio is better utilised and more financially sustainable. Property wear and tear may also be reduced when families live in appropriately sized, rather than over-crowded homes.

LAHC's current tenants, and those on the NSW Housing Register, needing larger bedroom homes will continue to have access to suitable and available accommodation³, including Aboriginal families who may be supported by the 'extra bedroom' policy.

1.3.3 LAHC Disposal policy

LAHC's [Disposal Policy](#) notes strategic reasons where disposals may be desirable, including generating funding for other better designed and quality homes, increasing the portfolio's fit for purpose and utilisation, deconcentrating social housing, extracting value from development and supporting other policy objectives to be achieved, such as home ownership or increased A/CHP managing Aboriginal tenants.

The Disposal Policy notes properties can be occupied and identified for strategic disposal. A tenant profile and relocation risk rating assessment should be included in the disposal request put to LAHC's governance which considers sales, and on-forwarded to the final approver in accordance with the relevant delegation.

1.3.4 Adjacent policy

A strategic approach to relocations can support tenancy managers to plan ahead to re-house tenants with particular property or property modification needs.

DCJ's [Changing a Tenancy](#) Policy guides how DCJ manages tenancies for LAHC-owned properties, so LAHC can manage its property portfolio effectively to maximise the benefit social housing can provide to vulnerable people and families. [NOTE: At December 2020 the DCJ policy needs some refreshing to reflect machinery of Government changes].

² LAHC Asset Portfolio review reports in 2018 and 2019 and the NSW Housing Register

³ The term "suitable and available accommodation" is used throughout the policy meaning LAHC and the tenancy managers will relocate tenants to homes that meet their needs that is either LAHC owned or temporary accommodation i.e. headlease or short-term vacant buildings or other type of construction such as pre-fab or modular homes.

DCJ's Headleasing Policy provides the framework for DCJ to lease on LAHC's behalf in the private rental market and then sub-lease to tenants or clients who have been approved for social housing to meet waitlist demand. LAHC relies on headleases as a temporary measure to relocate tenants to suitable accommodation for management purposes.

The Disability Modifications Policy explains how DCJ and LAHC manage disability modification work requested by a tenant or an approved housing applicant. LAHC assess these requests and if determined that a property is not suitable for modification, clients may be transferred to a more suitable and modified home. [NOTE: This policy does not apply to properties leased under the Headleasing Program, Private Rental Subsidy, or properties both owned and managed by CHPs].

CHPs who manage LAHC properties may also have relocations policies. When tenants in LAHC-owned CHP-managed properties are affected by a strategic relocation, or when a CHP proposes to redevelop a LAHC-owned property, LAHC will work with the CHP, and when needed DCJ and/or AHO, to achieve the strategic relocations, balancing relevant guiding policies.

When Aboriginal families are tenants of LAHC-owned properties where a strategic relocation is required, consideration will be given to how the objectives of [Strong Family, Strong Communities](#) can be met, including the opportunity for the relocation to support an outcome where more Aboriginal families are serviced by an Aboriginal organisation supported by the local Aboriginal specialist.

LAHC acknowledges the sensitive nature in all agency or provider initiated relocations, especially for Aboriginal people's, families' and communities' connections to land and Country.

When AHO-owned or managed properties are part of a LAHC renewal site, LAHC and the AHO will work together to communicate in culturally appropriate ways about the changes, and work with DCJ, and/or a A/CHP or a CHP, to support an outcome where more Aboriginal families are serviced by an Aboriginal organisation.

[Closing the Gap](#) targets aim to reduce over-crowding, by increasing the proportion of Aboriginal households in appropriately sized housing to 88% by 2031. Strategic relocations should have regard to reducing over-crowding to support this target.

LAHC is developing a sales to tenants policy to guide LAHC about properties which are suitable for sale to tenants and which properties are most likely to be approved for sale if a tenant wants to purchase their home. The policy may generate demand for strategic relocations.

LAHC is developing a crisis and transitional housing policy to guide decisions about the supply of properties for these uses. The policy will guide when and how LAHC may require a leased property to be relinquished and factors considered regarding consequential relocation of the service to a suitable property which may generate demand for a strategic relocation of a social housing tenant.

1.3.5 Relocating tenants for management purposes

DCJ and LAHC (and AHO) share the [Changing a Tenancy policy - Tenancy Policy Supplement](#), which includes arrangements to *facilitate the relocation of a tenant for management purposes*.⁴

LAHC may require relocation of a tenant or tenancies for reasons relating to property portfolio management.

DCJ may require relocations for ‘tenancy management’ purposes.

Some of the reasons a tenant may be relocated for ‘tenancy management’ purposes are relevant to LAHC’s Portfolio Strategy.

LAHC expects its tenancy management partners (DCJ and CHPs) to use relocations as a tool to:

- maximise the number of households housed in homes which match their needs (ie bedrooms, modifications / accessibility)
- maximise property utilisation by reducing under-occupancy
- maximise rent collection from each property by avoiding mismatch in household and property
- reduce over-crowding (and related wear and tear on properties)
- support repairs, maintenance and capital upgrades
- utilise properties that have been modified for people with disability.

The table below lists the reasons a tenant may be relocated. The list of reasons where a tenant may be relocated for management purposes focuses on reasons relevant to LAHC’s Portfolio Strategy.⁵

Tenants can be relocated when:	
Portfolio management	<ul style="list-style-type: none"> • LAHC intends to: <ul style="list-style-type: none"> ○ sell a property or group of properties ○ demolish a property or group of properties ○ redevelop the land the property is on to provide a greater number and/or more appropriate housing. • The property has been designated for occupation by a particular client group, such as older people, and the tenant/tenant’s household does not belong to this client group. • Any other compelling reason relating to the management of LAHC’s property portfolio.

⁴ Includes information about DCJ staff delegations in relation to some activities.

⁵ Other reasons may also apply (such as eligibility etc, which are not relevant to this strategic relocations policy).

Tenancy management ⁶	<ul style="list-style-type: none"> • LAHC intends to carry out <u>substantial upgrading work on the property</u> and the property needs to be vacant so that this work can happen. • <u>Under-occupancy</u> – the property is too large for the tenant’s household⁷, for example, due to changing circumstances such as children leaving home. • <u>Overcrowding</u> – too many people are living at the property (which can increase wear and tear on the property). • The property has features, such as <u>modifications</u> for people with a disability, which are no longer needed by the people living in the property. • Any other compelling reason relating to the management of a particular tenancy.
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1.4 Strategic relocations enable policy delivery

Strategic tenant relocations are required to implement and achieve the outcomes sought through Future Directions and the LAHC Portfolio Strategy vision and priorities.

To deliver on these policies and priorities, for a time, an increasing number of LAHC projects and programs will require strategic tenant relocations.

These include:

- renewing ageing social housing that is not fit for modern use
- deconcentrating social housing
- reducing over-crowded properties
- increasing utilisation, sustainability and reducing under-occupancy to better match the size of homes to tenants and reduce the subsidy between rent paid and market rent
- reducing maintenance and disability modification costs
- increasing the proportion of the portfolio which is fit for modern use as social housing
- generating funding for more homes
- transferring properties to AHO or another agency’s ownership
- testing new housing delivery and financing models
- leveraging the redevelopment uplift benefits created by transport, health or education infrastructure provided by other Government agencies.

Driving a strategic approach to tenant relocations will enable LAHC to:

⁶ LAHC recognises Aboriginal people’s and families’ and communities’ connections to land and Country.

⁷ Aboriginal and Torres Strait Islander people can sometimes be exempt due to the cultural connection to the land.

- deliver on the aims of Future Directions
- deliver on the vision and priorities set out in the LAHC Portfolio Strategy
- improve the flexibility of the LAHC portfolio so it better meets current and future tenant and applicant demand
- redevelop, renovate or sell ageing, poorly located, or no longer suitable social homes, so there are more homes of the right size fit for modern use
- improve property utilisation, so more tenants live in homes that align with their household size and needs
- minimise major upgrade works, for example, replacing kitchens or bathrooms, or structural works including for disability modifications that make it hard for tenants to remain in the home while works are being completed.

2 Scope and application

2.1 In scope

The policy applies to strategic relocation of tenants living in LAHC-owned properties.

The policy applies when there is a strategic need to relocate tenants in properties:

- in which LAHC has a whole or part interest, including properties:
 - managed by DCJ
 - managed by, or leased to, other parties, including AHO and CHPs
 - located in designated redevelopment sites
 - subject to disposal through strategic sales
 - subject to housing programs aimed at reducing under-occupancy or over-crowding.

The policy allows:

- LAHC to request DCJ, AHO and/or a CHP who manages/or will manage LAHC properties to cooperate to find alternate homes
- for relocations to occur ahead of housing general waitlist applicants (noting priority waitlist applicants would always be housed first), to support right-sizing, so in time, more applicants from the general waitlist can also be housed
- facilitation of relocations for social housing tenants who require a smaller or larger home and/or property modifications to meet their needs, when suitable accommodation becomes available
- for social housing tenant relocations to facilitate allocation of suitable and available properties for use as specialist homelessness services, following occasions where LAHC has required a property used by a specialist homelessness service for other purposes

- LAHC to work with a CHP, where the CHP manages and/or is taking on the management of LAHC's properties, to maximise options for tenant relocations to occur for strategic portfolio management purposes
- under some lease arrangements, for CHPs managing and/or taking on the management of LAHC properties, to manage relocations in line with their own tenant relocations policy (noting that in some instances a 12 month notice is required for a property return under the 20 year lease agreements)
- the use of public housing headleasing funds to support strategic tenant relocations when required, including short-term use of vacant buildings or other short-term use of accommodation.

2.2 Out of scope

This policy does not apply to:

- tenant-initiated requests to their tenancy manager to transfer to another property
- tenants who are being transferred due to anti-social behaviour or for other tenancy management purposes⁸.

2.3 Application

The policy is to be applied by all LAHC governance groups and followed by all LAHC officers and contractors (who have no approval powers).

This policy is to be applied by tenancy managers of LAHC properties when tenant strategic relocation activities are required.

LAHC will work with its tenancy managers to plan for, implement and complete strategic relocations and will use its standing governance for this.

The following LAHC governance groups have a role in strategic tenant relocations:

- Property and Investment Committee (P&IC)
- Committee for the Approval of Property Sales (CAPS)
- Any project control group created for a specific project requiring strategic relocations.

This policy notes that LAHC's Service Level Agreement (SLA) with DCJ for tenancy management may additionally provide for other particular arrangements about how some strategic relocations are governed. [Note as of December 2020 the SLA is still being negotiated with DCJ].

⁸ Tenancy managers to work with LAHC should the circumstances be related to property damage and/or for the protection of the tenant.

3 Legal framework

LAHC is a Public Trading Enterprise established in 2001 under the *Housing Act 2001*.

LAHC operates under the portfolio and direction of the Minister for Water, Property and Housing.

This policy has been developed and is to be implemented in line with:

- *Housing Act 2001*
- *Residential Tenancies Act and Regulations 2010*
- Terms of the residential tenancy agreement.

The [Housing Act 2001](#) provides LAHC the functions to develop and redevelop land for public and residential development purposes ([s8](#)). The Act's objectives ([s5](#)) include obligations to:

- (c) ensure that public housing is developed as a viable and diversified form of housing choice
- (d) ensure that public housing and community housing reflects the housing standards of the general community and is designed to cater for the ongoing needs of consumers
- (i) encourage social mix and the integration of different housing forms in existing and new communities.

The *Residential Tenancies Act 2010* includes provisions in [Part 7](#) for LAHC as the landlord to provide 'alternative' premises ([s148](#)) and for a tenant to have that decision to reviewed ([s149, 150 and 151](#)).

4 Policy statement

4.1 Principles for strategic relocations

4.1.1 Core principles that will guide relocation decisions and considerations

- Relocations are used to enable LAHC to make the best possible use of its land and properties, so more people and families can access better quality social housing.
- LAHC recognises Aboriginal people's and families' and communities' connections to land and Country.
- LAHC recognises relocations and change can be unsettling for tenants and will demonstrate respect for tenants, their knowledge and the valuable contribution

they make by providing appropriate communication, genuine consultation and transparency.

- LAHC and relevant tenancy managers will communicate early, often and culturally appropriately with tenants about planned and actual relocations. This may mean meeting with affected tenants and Aboriginal community members and family before renewal programs are publicly announced or holding a yarning circle to complement letters about a change.
- Tenants should be required to relocate as few times as possible during their tenure with LAHC. Tenants should be given priority for rehousing to suitable and available properties. As LAHC's strategic portfolio priorities may change over time, some tenants who have relocated previously may need to relocate again.
- For redevelopment projects, all tenants can express an interest to return to the redeveloped social housing property if they choose to, where LAHC-owned accommodation is suitable and available. Tenants relocating from a property which will be redeveloped for social housing can express their interest in returning to live at that site once redevelopment is complete, with preference given to Aboriginal tenants where they have connections to land and Country, if there will be suitable and available accommodation for them to return to.
- Timely relocations enable best use of everyone's resources – so the social housing system can use its resources well and house as many people and families as possible (LAHC will provide DCJ with estimates of the number of strategic relocations that will be required over each financial year, prior to 1 April).
- For relocations related to deconcentration projects designed since the start of Future Directions in 2016, projects will aim to provide at least replacement social housing stock if economically feasible. This will help to support the wider renewal of the social housing portfolio, with new fit for purpose homes.
- Older deconcentration projects (such as those which are continuing to be implemented at Claymore and Airds-Bradbury) were not designed to provide replacement properties or tenancies as part of the tenure reconfiguration work and it is recognised this creates demand pressure for tenancy managers and other operational challenges. To mitigate this, project redevelopment works are undertaken in a staged manner over a longer development timeframe.
- Where a timeline related to a deconcentration or other renewal project is varied at short notice due to a change in Government direction (for example to accelerate a project when directed), LAHC will work with the affected tenancy manager/s to design a relocation program of best-fit, so project timelines can be met.
- For properties which are specifically planned for sale or renewal in the future (1 - 2 years), tenant requests to alter a property in ways which would require like for like amenity to be provided at the next property should not be approved (eg garden sheds, air conditioning, floor coverings).

- When LAHC requires a property used for crisis or transitional housing purposes to be returned to it and the lease is terminated, LAHC's crisis and transitional housing policy will apply (noting at December 2020 this policy is in development).

4.1.2 Principles that will guide tenant relocation processes

- Tenants will be always be provided written notice as to the reasons they are being relocated with as much lead time as possible, guided by the *Residential Tenancies Act* and/or the Residential Tenancy Agreement, or if the relocation relates to a service provider, any other relevant lease conditions. Sometimes, for example to implement a change in Government direction such as accelerated timeframes, notice periods may be short.
- When relocations are DCJ managed, tenants will have a dedicated relocation officer working with them to assess their housing requirements to find them a suitable and available home to move to.
- Relocation costs should be minimised, so that as much funding as possible is available to house more vulnerable people and families.
- There are opportunities to reduce the costs of relocations, including relating to removalists, rubbish removal, the time taken to complete a relocation, inducements and modifications. (LAHC would like to explore whether upfront agreed rates for relocation, removalist and/or rubbish services could reduce costs).
- Tenants who live in larger homes and are single/couple person households and/or require modifications to older and/or less suitable properties should be relocated to properties which already meet their needs. If needed, other tenants living in an accessible or modified property who do not need that feature may be relocated, when that makes financial sense. (This is permitted for tenancy management purposes already.)
- CHPs managing and/or taking on the management of LAHC properties may manage relocations in line with their own tenant relocations policy where they have been contracted to do so. CHPs that manage LAHC properties where contracts require specific notice for relocations, ie longer timeframes, will need to be considered.
- Where relocations involve Aboriginal families, joint engagement between LAHC and AHO will occur with DCJ (which is the main tenancy manager for AHO properties).
- For redevelopment projects and new supply programs:
 - LAHC recognises that some locations will be under significant supply pressure due to demand for relocations to support large scale redevelopment or new supply programs.
 - LAHC will increasingly seek to supply suitable and available temporary homes (which is distinct from motel-based 'temporary accommodation') near the redevelopment site if tenants wish to remain living in the area.

- Temporary homes may include those made available through headleasing, short-term use of vacant buildings (ie 'meanwhile use'), studio accommodation for single person households, or through pre-fabricated or modular materials.
 - Temporary homes are a way to provide greater certainty and secure accommodation for tenants, the redevelopment project, and minimise costs.
- LAHC will work with relocations teams and delivery partners to assess staging of larger redevelopment projects. This can help to facilitate progressive tenant relocations from housing to be demolished into new or additional social housing on or nearby the site.
- If a property is leased, including to a CHP, the lessee will meet the relocation costs.
- If a property is DCJ or AHO managed, relocation costs will be negotiated and may be met as a cost of the redevelopment project.
- Decisions regarding strategic relocation will seek to balance the obligations of LAHC to provide more and better social housing (eg. through projects or programs that require relocations) and the needs of tenants to access particular services or other social supports.
- LAHC will ensure its pool of housing stock is maintained to the required standard of clean, safe and habitable, and if deemed necessary by LAHC, make provision to provide like for like amenity (except if building works were unauthorised), if the tenant relocating to a LAHC property is to live there on a long term basis.
- Where relocations are required in an allocation zone with little turnover of suitable and available properties, tenants will be provided with practical assistance to support their move to an allocation zone where there is suitable and available accommodation if there is the opportunity to do so.
- Practical options to assist a tenant to access the services and social supports they require will be considered by tenancy managers where the property they will relocate to is located outside their usual neighbourhood.
 - For example, placing tenants in contact with support options to assist with transport costs to access a hospital or specialists if it is more cost effective than extending the period of relocation uncertainty to find a property nearer to the service or social support.

4.1.3 Regard for tenant experience

LAHC acknowledges the value of the experience and outcome of stable housing and that tenants gain safety, security, and belonging from their home, neighbourhood and community.

In partnership with tenancy managers, planning relocations with clear timeframes and developing culturally appropriate tenant engagement strategies will increase certainty for tenants to reduce anxiety about relocations and housing security.

4.2 Projects that require large scale tenant relocations

Relocations can vary from a single household relocating to large-scale relocations of whole communities, or social housing estates.

For large-scale relocations, a project team may be needed to manage the process of implementing this policy.

LAHC will require its tenancy management partners, and if relevant its redevelopment partners, to collaborate to support relocations.

A Secretaries' Charter and RACI has been developed to clarify roles and responsibilities between the DPIE (LAHC and AHO) and the Stronger Communities (DCJ) clusters. As needed, the RACI may be refreshed or expanded to reflect roles and responsibilities which support relocations for management purposes.

For large-scale relocations projects, LAHC's tenancy management partner (ie DCJ, AHO or a CHP) may, in consultation with LAHC, set up a community reference group or hold community forums to provide information about the relocations.

The decision to set up a group or forum of this type will be made by LAHC and/or the tenancy management partner based on factors such as the scale or complexity of the relocation process, the appropriateness of other available communication or feedback options and the level of interest from members of the community affected by the relocation.

4.3 Site specific relocations strategies

Site specific relocation strategies may be developed to complement or implement this policy.

The LAHC Relocations Team has developed site specific relocations strategies for particular LAHC projects.

The strategies document the relocation process and outline the governance and reporting of project specific relocations for LAHC redevelopments.

The strategies look holistically at the allocation zone to understand supply versus demand and identify new supply gaps and includes a tenant profile and relocation risk rating assessment.

The strategies are distributed across DCJ including relevant districts and to the DCJ Housing Statewide Services Relocations Team who will carry out the relocations.

These strategies are generally approved by the DCJ District which gives LAHC some certainty around allocations of vacant properties to support the relocations required.

These site specific strategies can inform a partnering CHP allowing them to lead tenant relocations in addition to tenancy management responsibilities.

4.4 Strategic sales of properties that are not fit for modern use as social housing

A strategic relocations program will be required to complement a strategic sales program. Tenant relocations that support strategic sales enable LAHC to make better decisions about which properties should be sold.

In recent times LAHC has waited until a property becomes vacant before considering it for sale. While this does not create disruption to current tenants, it reduces LAHC's options for growing and changing the portfolio to meet the needs of ageing tenants and households on the waitlist.

Waiting until a home is vacant before it is planned for sale also puts time pressure on LAHC to make a decision about its sale – as once a property is vacant, there is no rent paid and it is at increased risk of vandalism or fire. This reduces LAHC's capacity to grow and change the portfolio to meet tenant needs, and has meant vacant homes which are well-located close to shops and transport are sold, while less well-located or older and worn out homes remain in the portfolio. Today, vacant properties are considered opportunistic voids and assessed for redevelopment potential in its portfolio decision making process.

When LAHC is able to strategically sell homes that are not fit for modern use, the sales proceeds contribute to the supply of better designed and quality homes available for current tenants and to house more families from the priority waitlist.

Targeted sales programs will focus on generating funds for new homes or capital upgrades to other homes, and reducing the number of properties in the portfolio which are not fit for modern use (such as those which cannot be easily modified to meet tenants needs, those with heritage and conservation constraints which are significantly more expensive to maintain, those in bushfire, flood or sea level rise locations, and those affected by termites).

4.5 Timeframes and resources for relocations and social housing

Timely tenant relocations help maximise the funding and support available to provide more and better social housing.

The time taken for relocations to occur and be completed affects the costs and value delivered from LAHC's strategic projects.

Increasing the certainty of timing for relocations to occur and be completed:

- allows the redevelopment or strategic project to start or continue
- reduces costs such as forgone rent from vacant homes
- will support LAHC to test new housing delivery and financing models – including pre-fabricated or modular housing and building alternate new homes first prior to renewal or disposal projects

- helps LAHC provide more and better social housing to more vulnerable people and families in the long-term.

As LAHC is to deliver a large number of new and replacement social homes in areas of high demand as part of the NSW Government's Future Directions policy, there are a number of strategic projects which require relocations which will occur concurrently (for example in the inner city of Sydney).

This means for a time there may be fewer homes available for tenants affected by relocations to be allocated to (as old homes may be demolished before being rebuilt), and tenants may have less choice about the housing they are relocated to.

LAHC requires relocations to be timed to maximise occupancy and minimise loss of rental income.

This means LAHC will collaborate with its tenancy management partners in culturally appropriate ways to implement relocations programs over shorter periods, with more households relocated at higher rates.

To support this, LAHC will explore short-term use of vacant buildings, pre-fabricated and modular alternative housing, and using funding models to build new homes first prior to relocations.

For larger renewal estates, careful staging of construction of new homes can reduce the number of existing tenants needing relocation at any one time.

4.6 Tenancy management agreements for relocations

LAHC can require relocations to occur under existing tenancy management agreements with either DCJ or CHPs.

Under this (strategic relocations) policy LAHC can specify other or complementary approaches for how relocations are managed.

For example, LAHC could ask DCJ who manages most existing tenancies to collaborate with a CHP who will manage future tenancies. Or, LAHC could ask DCJ and one or more CHPs (including ACHPs) to support particular relocations programs.

This could expand the pool of potential properties available for relocated tenants and provide tenants a greater opportunity for choice about their future home and service provider.

Applying the principle that tenant relocations should be minimised, involving CHPs in relocations where they will take on managing the tenancies of LAHC properties would over time increase the number of tenancies managed by CHPs and incrementally increase the amount of Commonwealth Rent Assistance attracted to NSW.

Where AHO properties are part of a LAHC strategic project site (eg to deconcentrate, renew, or dispose of social housing as part of asset recycling), LAHC will engage with the AHO about how engagement with AHO tenants and Aboriginal tenants in LAHC-owned properties should occur recognising this will be done in culturally appropriate ways, respecting connections to land and Country. Where appropriate,

joint engagement between LAHC and AHO will occur with DCJ (given it is the main tenancy manager for AHO properties).

Where possible and appropriate, Aboriginal tenants will have the option of engaging with an Aboriginal worker about relocations, and over time, LAHC would partner with the DCJ and AHO to support more Aboriginal tenants to have the choice of their housing services being delivered by an A/CHP.

5 Code of Ethics and Conduct

Public officials are expected to act ethically and in the public interest. Part 2 of the *Government Sector Employment Act 2013* establishes the ethical framework for the Government sector.

Corrupt conduct is defined in Sections 8 and 9 of the *Independent Commission Against Corruption Act 1988*.

6 Definitions

Term	Definition
AHO	Aboriginal Housing Office, Department of Planning, Industry and Environment
Allocation Zones	DCJ Housing allocation zones are a group of areas or towns where social housing is available.
CAPS	Committee for the Approval of Property Sales
CHP or A/CHP	A reference to a CHP may be to a mainstream or Aboriginal CHP. A reference to CHP does not exclude an ACHP. Registered Community Housing Provider or Aboriginal Community Housing Provider. An entity that provides community housing and is part of the NSW Local Scheme or is listed on the National Provider Register of the National Regulatory System for Community Housing (established under the provisions of the <i>Community Housing Providers (Adoption of National Law) Act 2012</i> .
DCJ	Department of Communities and Justice (formerly known as Department of Family and Community Services)
DCJ Housing Statewide Services Relocations Team	Specialist centralised DCJ Housing Relocations team focusing solely on relocations for large scale, specialist or business as usual projects. Formed initially to relocate tenants from Millers Point.
General social housing	Social housing includes public housing (LAHC owned and DCJ managed), social housing (LAHC owned and CHP managed, and CHP owned and managed) or Aboriginal housing (AHO owned and DCJ

Term	Definition
	managed, AHO owned and ACHP managed, and ACHP owned and managed
LAHC	New South Wales Land and Housing Corporation, Department of Planning, Industry and Environment
P&I Committee	LAHC Property and Investment Committee
RACI	A 'RACI' document describes who is responsible, accountable, consulted or informed about particular matters
Tenancy Management Partners	These include DCJ, AHO, CHP and A/CHP.

7 Monitoring and review

It is the responsibility of the LAHC Policy and Innovation Division to monitor and update this policy when required. Future changes will be submitted to the Chief Executive for approval.

This policy will be reviewed annually and routinely refreshed when there is any significant new information, legislative or organisational change that warrants changes to this document.