

Actions Speak

Housing ACT

Implementation of recommendations from our July 2023 report *How do you tell someone they have to move? Housing ACT's implementation of mandatory relocation under the Growing and Renewing Public Housing Program*

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Acknowledgement of Country

We acknowledge the Ngunnawal people as traditional custodians of the ACT and recognise any other people or families with connection to the lands of the ACT and region. We acknowledge and respect their continuing culture and the contribution they make to the life of this city and this region.



Why did we do this report?

On 31 July 2023, following an own motion investigation, we published our report [How do you tell someone they have to move? Housing ACT's implementation of mandatory relocation under the Growing and Renewing Public Housing Program](#) (our Report).

Our investigation focused on Housing ACT's implementation, communication and engagement with tenants around mandatory relocation under the Growing and Renewing Housing Program (the Program).

We made 9 recommendations to Housing ACT aimed at strengthening the support and assistance provided to tenants with known vulnerabilities and balancing the legitimate public policy goals of the Program with the needs of public housing tenants.

Housing ACT accepted all 9 recommendations. Four days after the release of our Report, the ACT Government paused mandatory relocations under the Program. In November 2023, the ACT Government announced that all relocations of tenants under the Program would be voluntary.

The purpose of this implementation report is to provide transparency and assurance about Housing ACT's actions to implement the recommendations from our Report.

How did we assess implementation?

We conducted a desktop review of Housing ACT's implementation of the recommendations. This involved reviewing copies of documents and Housing ACT's website. Where our review led to further questions, we sought additional information from Housing ACT.

What we found?

We found Housing ACT had implemented 5 recommendations in full and had partially implemented one recommendation. We also concluded that 3 recommendations had been superseded as a result of changes to the Program and the passage of time.

5 Implemented



1 Partially Implemented



3 Superseded



Next steps

We are pleased to see Housing ACT's increased awareness of tenant welfare in its decision-making and engagement.

At the same time, we encourage Housing ACT to continue to:

- uplift its capability and develop guidance materials to give staff and tenants greater clarity about how Housing ACT performs its role of delivering secure and sustainable housing to the ACT, and
- invest in capability to capture and analyse feedback to identify themes and trends that can inform continuous improvement to service delivery.










While 2 of the 3 superseded recommendations were no longer directly relevant to the Program because Housing ACT shifted from mandatory to voluntary relocations, we consider the lessons from our investigation to have ongoing relevance. We encourage Housing ACT to implement any future mandatory relocations in a manner consistent with the lessons identified in our investigation, including giving tenants clear, timely and accessible information about matters affecting them.

We also encourage Housing ACT - or any agency dealing with relocations - to proactively identify as early as possible any emerging circumstances that may lead to future mandatory relocation of public housing tenants and undertake comprehensive planning early in the life of any such program to ensure appropriate systems are in place to assist tenants with the process.

We will continue to monitor the effectiveness of Housing ACT's policies and procedures through routine engagement and analysis of complaints received by our Office. We will also return to monitor implementation of the one partially implemented recommendation within the next 12 months.



Recommendations summary

<p>Recommendation 1</p> <p>Housing ACT update its Growth and Renewal Exemptions Policy and Practice Guide and Required Relocation Operational Policy to require Tenant Relocation Officers to advise tenants of exemption criteria and processes at their first engagement.</p>	
<p>Recommendation 2</p> <p>Housing ACT finalise its Business Process Reengineering to improve policies, practices and procedures for Housing ACT staff, particularly Tenant Relocation Officers.</p>	
<p>Recommendation 3</p> <p>Housing ACT update website content to ensure information about the Program is easy to locate and implement a process to ensure website content is updated and information is regularly reviewed.</p>	
<p>Recommendation 4</p> <p>Housing ACT publish information about the exemption criteria and process on its website.</p>	
<p>Recommendation 5</p> <p>Housing ACT develop and deliver specific training for Tenant Relocation Officers to ensure they are equipped with the necessary skills and training.</p>	
<p>Recommendation 6</p> <p>Housing ACT use key findings from the <i>Growth and Renewal Tenant Relocation - Review of the Communication and Engagement Process</i> to conduct a formal evaluation of the Program and implement recommendations for improvement.</p>	
<p>Recommendation 7</p> <p>Housing ACT implement a process to collect, analyse and use information from complaints received, to improve implementation and service delivery of the Program.</p>	
<p>Recommendation 8</p> <p>Housing ACT establish a process to use available information about tenants' individual circumstances to inform its engagement and communication with 'at risk' tenants.</p>	
<p>Recommendation 9</p> <p>Housing ACT monitor the implementation and effectiveness of risk mitigation strategies to determine if they are achieving intended objectives.</p>	

ACT Ombudsman assessment

Housing ACT's implementation of recommendations



Recommendation 1

Housing ACT update its Growth and Renewal Exemptions Policy and Practice Guide and Required Relocation Operational Policy to require Tenant Relocation Officers to advise tenants of exemption criteria and processes at their first engagement.

Status: Superseded



Ombudsman comments

Four days after the publication of our Report, on 4 August 2023, the ACT Government paused mandatory relocations under the Program. On 30 November 2023, the ACT Government announced that all relocations of tenants under the Program would be voluntary. As a result, any recommendations for improvement targeted at mandatory relocation have been superseded.

Nonetheless, we encourage Housing ACT, or any other agency, to consider the lessons from our Report, particularly around communication with tenants or other impacted people, if circumstances emerge that again require mandatory relocation.





Recommendation 2

Housing ACT finalise its Business Process Reengineering to improve policies, practices, and procedures for Housing ACT staff, particularly Tenant Relocation Officers. These documents should provide:

- an end-to-end practical guide on the steps in the processes for mandatory relocation
- practical guidance, including staff roles and responsibilities; engagement with and support for vulnerable people; service standards; and quality assurance measures.

Status: Implemented



Ombudsman comments

We assessed Housing ACT's updated *Growing and Renewing Public Housing Program—Voluntary Tenant Relocation Policy and Guidelines* (the Policy) and considered whether it included the practical guidance identified by our Report.

We found the Policy addresses key parts of the Program's administration, service standards, roles and responsibilities of Tenant Relocation Officers and delegates, and quality assurance. It communicates information using active and practical language, visual illustrations and includes a focus on personalising engagement with people at risk. The *Tenant Relocation Information Collection Tool* includes practical prompts and guiding words to support staff to collect information from tenants and identify their needs.

Recognising that the Policy is relatively new, we encourage Housing ACT to keep it under active review and enhance it with additional information around its processes that are not fully covered. For example, the Policy references that an extension of time to return a property may be provided on a 'case-by-case basis' without explaining how to assess the circumstances around such a case. We consider there could be value in expanding that and similar sections.





Recommendation 3

Housing ACT update website content to ensure information about the Program is easy to locate and implement a process to ensure:

- website content is updated to reflect any significant changes made to the Program
- information is regularly reviewed for accuracy and currency.

Status: Implemented



Ombudsman comments

We reviewed Housing ACT's website. Housing ACT has published its *Growing and Renewing Public Housing Program—Voluntary Tenant Relocation Policy and Guidelines* (the Policy) on the landing page of its website. The Policy includes information about the Program written in plain language and from a tenant's point of view.

We also confirmed information about the Program can be found on the Housing ACT website by searching keywords. The Program webpage itself includes updated information about the voluntary relocation process and a phone number and email address to enable direct contact with the Program area.

Housing ACT has undertaken to maintain the accuracy and currency of its website, including annual reviews of content. We intend to continuously monitor this item through our Office's regular engagement with Housing ACT.





Recommendation 4

Housing ACT publish information about the exemption criteria and process on its website

Status: Superseded



Ombudsman comments

Four days after the publication of our Report, on 4 August 2023, the ACT Government paused mandatory relocations under the Program. On 30 November 2023, the ACT Government announced that all relocations of tenants under the Program would be voluntary. As a result, any recommendations for improvement targeted at mandatory relocation have been superseded.

Nonetheless, we encourage Housing ACT, or any other agency, to consider the lessons from our Report, particularly around maintaining up to date and accurate website information, if circumstances emerge that again require mandatory relocation.





Recommendation 5

Housing ACT develop and deliver specific training for new and existing Tenant Relocation Officers to ensure they are equipped with the necessary skills and training to:

- proactively engage appropriate with vulnerable tenants about mandatory relocation
- understand and communicate key features of the Program to tenants who are required to relocate, including the exemption process and the support available to tenants.

Status: Implemented



Ombudsman comments

In October 2023, all Tenant Relocation Officers (TROs) participated in human rights training conducted by the ACT Human Rights Commission. The training covered human rights obligations of ACT government agencies under the *Human Rights Act 2004* and the *Discrimination Act 1991*. These concepts were discussed using case studies about working with public housing tenants to allocate properties.

In January 2024, TROs and management staff participated in training about the voluntary relocations process. The training covered the *Growing and Renewing Public Housing Program—Voluntary Tenant Relocation Policy and Guidelines*, a human rights approach to decision-making, trauma-informed approaches to engaging with tenants and using the *Tenant Relocation Information Collection Tool*.

Housing ACT also added training on human rights and the voluntary relocations process to its induction training for new members of the Relocations Team.





Recommendation 6

Housing ACT use key findings from the *Growth and Renewal Tenant Relocation – Review of the Communication and Engagement Process* to conduct a formal evaluation of the program and implement recommendations for improvement.

Status: Superseded



Ombudsman comments

When our Office made Recommendation 6, the Community Services Directorate had commenced the *Growth and Renewal Tenant Relocation – Review of the Communication and Engagement Process* (CSD Review). However, it had not undertaken any broader evaluations of the Program. We anticipated that the CSD review would provide a useful starting point for such an evaluation given its focus on communications for mandatory relocations.

Four days after the publication of our Report, on 4 August 2023, the ACT Government paused mandatory relocations under the Program. On 30 November 2023, the ACT Government announced that all relocations of tenants under the Program would be voluntary.

As a result, there was a significant shift to the nature of the Program, and a focus on improved engagement with tenants, and supporting policies and practice.

As Recommendation 6 focused on an evaluation of the Program when it involved mandatory relocations, we consider that it has been superseded.

Nonetheless, we would encourage Housing ACT when initiating new projects or programs to undertake reviews and evaluations during the life of the project or program to identify and address issues and risks as they arise.





Recommendation 7

Housing ACT implement a process to collect, analyse and use information from complaints received, to improve implementations and service delivery of the Program

Status: Partially implemented



Ombudsman comments

Housing ACT advised that it considered this recommendation implemented. As part of its standard reporting activities, the Growing and Renewing Public Housing Operational Committee (GROC) now receives quarterly reports, which include the number of complaints received about the Program. Housing ACT also advised us of its intention to implement improvements to the Program from data collected as part of a survey of Program tenants in the second half of the 2023-24 financial year.

As evidence, Housing ACT provided us the agenda for the GROC and one quarterly report. The report included complaint numbers under the topic 'key issues or achievements'. There did not appear to be a focus on complaints insights or generating Program improvements. Further, this report showed no complaints specific to the Program were received in that quarter.

The value and effectiveness of quarterly reporting is dependent on the quality of information captured at the complaint/feedback handling level. Our Report found that Housing ACT was missing valuable opportunities to use complaints as a source of data for improvements, as it did not have the capacity to separate complaints about the Program from other complaint themes. Nor could it distinguish concerns about the Program from concerns about the conduct of Tenant Relocation Officers. It is not evident what improvements Housing ACT has made to improve its information capture about Program complaints.

It is pleasing that Housing ACT is collecting information directly from tenants through a survey, with the intent of implementing Program improvements. This could be considered a legitimate alternative method of



implementing the intent of this recommendation to use information sourced from tenants to improve the Program.

While Housing ACT provided us with the report from its survey, it is unclear what actions Housing ACT has taken to date in response to the insights obtained from the completed survey.

To consider Recommendation 7 fully implemented, we expect to see Housing ACT:

- improving the collection of complaint information to better identify concerns about the Program (either through improved complaint data or regular surveys)
- establishing a clear and regular process to consider and use insights from the complaint and/or survey data to implement improvements to the program, and
- embedding continuous improvement by updating GROC terms of reference to include a focus on complaints data and trends.

We will continue to monitor this recommendation.





Recommendation 8

Housing ACT establish a process to use available information about tenants' individual circumstances – such as age, disabilities and dependents – to:

- proactively exempt tenants from mandatory relocation where their circumstances align with the Program's exemption criteria, and
- inform its engagement and communication with vulnerable tenants.

Housing ACT's relevant policies and procedures should be updated to reflect this process.

Status: Implemented



Ombudsman comments

Housing ACT's *Growing and Renewing Public Housing Program—Voluntary Tenant Relocation Policy and Guidelines* outline circumstances that may cause a tenant to be at risk and the potential impacts of relocation on a tenant's welfare. Staff are guided to identify tenant vulnerabilities at the outset and to personalise their approach to the relocation process based on individual tenant circumstances, including choosing not to explore relocation with a tenant. Offering to connect tenants to support services is part of the engagement process.

Housing ACT has also established a *Tenant Relocation Information Collection Tool*, which includes prompts and guiding words, to support staff to identify individual tenant circumstances and needs.





Recommendation 9

Housing ACT monitor the implementation and effectiveness of risk mitigation strategies to determine if they are achieving intended objectives.

Status: Implemented



Ombudsman comments

Housing ACT advised the Growing and Renewing Governance Framework includes risk management guidelines that involve regular risk reporting through the Growing and Renewing Operational Committee (GROC) and Growing and Renewing Steering Committee. Measures include an annual risk workshop assessing the effectiveness of established risk controls. Each line area is responsible for regular risk assessment as part of reporting requirements.

Housing ACT provided evidence that the GROC receives quarterly reports identifying 4 risks related to tenant experiences with the Program. Our initial assessment of the documentation was that it was not clear what strategies were in place to mitigate those risks, what evaluations are being conducted to assess if the strategies are meeting their objectives, nor the sources of information being used to inform Housing ACT's assessments (e.g. complaint insights, media reporting or other channels of feedback from tenants and the community).

To consider Recommendation 9 implemented, we required evidence that Housing ACT is engaging in activities to:

- identify risks related to tenant wellbeing and their experiences under the Program
- develop strategies to mitigate identified risks
- implement risk mitigation strategies
- evaluate whether risk mitigation strategies and activities are achieving their intended objectives, and
- use the learnings from evaluations to inform delivery of the Program.



As part of Housing ACT's response to the draft report (in full below) they provided further evidence of implementation. Based on this new evidence, we are now satisfied that Recommendation 9 is implemented.

Nonetheless, we note that had Housing ACT provided more probative and complete evidence at an earlier stage that would have assisted the assessment.





ACT

Government

Community Services

Ms Penny McKay
Acting ACT Ombudsman
GPO Box 442 Canberra ACT
Via email: actombo@ombudsman.gov.au

Ref: DBC:

Dear Ms McKay

Actions Speak: Implementation of recommendation report – Report into Housing ACT’s implementation of mandatory relocation under the Growing and Renewing Public Housing Program

I am writing in response to your correspondence of 13 November 2024, about the completion of your assessment into the implementation of recommendation made in your investigation report *How do you tell someone they have to move? Housing ACT’s implementation of mandatory relocation under the Growing and Renewing Public Housing Program investigation into Housing ACT’s Growth and Renewal Program.*

Thank you for providing me with your report and the invitation to review and provide you with a formal response to your findings.

I note that the ombudsman’s officer determined that four recommendations were implemented, two recommendations were partially implemented and three recommendations were superseded and no longer require implementation. A detailed response to the implementation report, focussed on recommendations seven and nine is at Enclosure 1. Please note that attachments provided to support the response contain confidential information and have not been provided for publication.

The Directorate will continue to engage with your office and provide regular updates on the implementation progress of recommendations at their quarterly meetings.

Yours sincerely



Catherine Rule
Director-General
Community Services Directorate

Enclosure 1

Recommendation 7

Client Surveys

The Community Services Directorate (CSD) notes the Ombudsman's acknowledgement of client survey's being a legitimate alternative method to implement this recommendation.

Housing ACT has undertaken its annual client surveys for the past two years (2022-23 and 2023-24) (see Attachment i for the 2023-24 survey report). The 2024-25 the client survey commenced in October 2024 and will run until February 2025. The annual client survey requests feedback on the client service experience across a number of matters, including tenant relocations. The questions focus on the following:

1. The customer service overall
2. The timeliness of the service
3. How respected they felt by the team
4. How knowledgeable they felt the team were
5. How supported they felt by the team

Any feedback generated by this survey will be discussed at the team level and where appropriate, improvements will be incorporated into operations, including team planning workshops and fortnightly meetings, Individual Performance Agreements and supervision, and reviewed on a quarterly basis.

GROC's Focus on complaints

The Ombudsman has stated that *"there did not appear to be a focus on complaints insights or generating program improvements"*. However, since the Directorate took steps (based on feedback) to significantly alter the program, there have been no reported client complaints in relation to the program. It is difficult to demonstrate GROC's focus on complaints in this circumstance.

Notwithstanding that, there is acknowledgment that systemising and embedding these practices is important, therefore at the next GROC meeting, the committee will consider further amendments to the Terms of Reference to establish a clear and regular process to consider insights received via complaints and annual client surveys to drive program improvements.

CSD will also be undertaking a refresh project on its Complaints Handling and Management Policy (CHaMP) in 2025 and through this project there will be further opportunity for

Housing ACT to improve the collection complaint information to better identify issues and trends.

Recommendation 9

It would appear from the Ombudsman's comments there has been a misunderstanding of the purpose of documents provided and level of detail required by the Ombudsman's Office to verify the appropriate risk management practices are in place.

In addition to the documentation already provided, GROC also considers the Growing and Renewing Risk Register at [Attachment ij](#) which clearly articulates the risk, risk indicators, source (which further demonstrates how Housing ACT is using feedback to address risk), impact of risk, risk controls and risk mitigations.

To further support robust risk practices, service delivery areas provide quarterly reports as part of GROC's reporting which also captures new information regarding risks and subsequent changes to controls and mitigations.

Feedback generated from the annual Client Experience Survey will provide further indicator.

Risks identified under the Growing and Renewing Public Housing Program are managed in accordance with the endorsed Growth and Renewal Risk Management Guidelines. The Growing and Renewing Operational Committee manage, monitor and regularly review both operational and strategic risks, including providing effective mitigation strategies and reporting issues of concern to the Public Housing Infrastructure Steering Committee.

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