

Policy: COVID-19 Response Policy		
Policy number: V1.0	Date Approved: 14 April 2020	
Approved by: Board of Directors Endorsed by: Chief Executive Officer		
Date developed: 9 April 2020	Developed by: Risk and Compliance Manager	Date of next review: Every two months 9 June 2020 (next Board of Directors Meeting)

Policy Context:	
	<p>This document is a 'policy' within the meaning of the Homes North Policy & Procedure Framework (the Framework).</p> <p>As a Governance related policy this policy requires Board approval.</p>

1. Purpose and Objectives

The purpose of this Policy is to set out Homes North's response to the COVID-19 epidemic in the following areas:

- The June 2020 Market and Subsidy Review
- Arrangements for calculating the rent of a tenant or household
- Negotiations where a tenant is in debt to Homes North
- Negotiations where a tenant is in debt to Homes North as a result of COVID-19 – for example, through job loss
- Hardship provisions for tenants affected by COVID-19.
- Homelessness products and services

2. Scope

This policy applies to all Homes North places of work, functions and to all employees.

3. Policy statements

3.1 Cancellation of June 2020 Market and Rent Review

Application:

This Policy cancels the scheduled rent re-calculations during the initial phase of the COVID-19 pandemic. Under the Community Housing Rent Policy rent reviews are required to be undertaken by Community Housing Providers every 6 months. The cancellation is consistent with actions taken by the NSW Department of Communities and Justice (DCJ) in relation to their scheduled April 2020 subsidy review, now cancelled, and therefore ensures equitable treatment of Social Housing tenants regardless of their Social Housing landlord.

Policy:

- The half-yearly Market and Subsidy Rent Review scheduled to commence June 2020 is cancelled.
- Accordingly, rents for social housing tenants are fixed until the October 2020 review unless:
 - The tenant provides information that requires re-calculation of the rent based on individual circumstances
 - The tenant formally requests a new rent calculation

3.2 Modification to the calculation of rents

Application:

This Policy applies to rent calculations conducted during the COVID-19 pandemic.

Policy:

This Policy is consistent with actions taken by the DCJ and sector best-practice: Homes North Hardship Provisions will apply in addition to the steps outlined below (please see '**Hardship Provisions**' below)

- New rent calculations will continue for social housing tenancies when:
 - An existing tenant provides information that requires re-calculation of the rent – for example, where the tenant advises that their income has decreased directly due to the impacts of COVID-19; OR
 - It is a new tenancy; OR
 - The household structure changes – for example, additional occupants are approved; OR
 - The tenant formally requests a new rent calculation

- Rent calculations for social housing will continue to comply with the Homes North Rent Charging (Social Housing) Policy and the NSW Community Housing Rent Policy. COVID-19 related additional payments (not anticipated in these policies) will not be assessed in rent calculations: This includes any additional payment made by any Australian government, or government agency specifically in response to COVID-19. For example, the additional payment for the job-seeker allowance, or the one-off \$750 Economic Support Payment.
- Affordable Housing
 - Rent will not be increased for existing affordable housing tenancies. This measure will be reviewed in October 2020.
 - New affordable housing tenancies will have their rent calculated in accordance with the affordable housing rent charging policy.
 - Hardship Provisions (see **Hardship Provisions** below) are available to existing affordable housing tenants, or new tenants whose circumstances change after they become tenants.
 - Evidence of income changes: Homes North will be flexible in the type of proof required to demonstrate changes to income or circumstance.

3.3 Modification to the Previous Debt Arrangements

Application:

This Policy applies to all pre-existing debt arrangements during the COVID-19 epidemic.

Policy:

This Policy has been formulated to be consistent with actions taken by the DCJ and sector best-practice:

- Current arrangements should be maintained unless a tenant or household can show negative changes to their circumstances
- Where a tenant or household can show negative changes to their circumstances management will re-assess as a New Debt Arrangement (see below).

3.4 Modification to the New Debt Arrangements

Application:

This Policy applies to all new debt arrangements during the COVID-19 epidemic.

Policy:

This Policy has been formulated to be consistent with actions taken by the DCJ and sector best-practice:

- Arrears repayments will be limited to 2% of gross income [note: rent must still be paid for the arrangement to continue]

- Gross income does not include any COVID-19 specific payments or supplements paid by any Australian government or government agency.

3.5 Modification to the Eviction Processes

Application:

This Policy applies to all new debt arrangements during the COVID-19 epidemic.

Policy:

This Policy is consistent with actions taken by the DCJ and sector best-practice. Accordingly, management will develop processes within the following parameters:

- A tenant will not be evicted on the basis of failure to pay rent PROVIDED THAT:
 - The non-payment results from the effects of COVID-19
 - The tenant agrees to enter a Repayment Plan with Homes North
 - The tenant agrees to subscribe to Centrepay or a similar automatic payment system.
 - The tenant adheres to the arrangements
- Where a tenant has entered an arrangement (see above), and fails to adhere to the arrangement, Homes North will take immediate steps:
 - To determine whether a new arrangement is appropriate having regard to the tenants current circumstances; AND/OR
 - To refer the arrangement to the NSW Civil & Administrative Tribunal for enforcement of the arrangement by order, or for termination of the tenancy.

3.6 Hardship Provisions

Application:

This Policy applies to all new debt arrangements during the COVID-19 epidemic.

Policy:

This Policy is consistent with actions taken by the DCJ and sector best-practice. The policy aims to minimise the negative impacts of COVID-19 on Homes North tenants by taking into account the needs and circumstances of each tenant and household where they are experiencing financial hardship as a result of COVID-19.

- Loss of employment: During the COVID-19 pandemic, tenants may experience loss of employment. Where this occurs AND the tenant is not in receipt of Centrelink benefits, Homes North will reduce their rent. Management will apply the following guidelines:
 - Total loss of income: Reduce rent to \$5pw until the household is in receipt of Centrelink benefits

- Affordable Housing: A feature of affordable housing is that rent is determined by the market value rent of the property. During the COVID-19 pandemic the following concession measures will apply:
 - Where a tenant or household applies for a rent reduction, AND can show negative changes to their circumstances as a direct or indirect result of COVID-19, Homes North will re-assess their rent as follows:
 - Homes North will apply the lesser of social or affordable housing rent
 - Application of social housing rent and hardship arrangements includes minimum rent whilst waiting for Centrelink benefits

3.7 Homelessness Service and Products

- Homes North will implement DCJ's new Temporary Assistance eligibility criteria and entitlements as they adapt to meet the need to accommodate vulnerable homeless community members during the COVID-19 pandemic.
- Homes North will participate in initiatives to accommodate people sleeping rough to ensure the safety of these individuals and the general community.

General considerations

Client aware practice: Homes North shall determine an adequate balance between the need to protect income through rent collections, and the need to adjust for the needs and capabilities of our tenants who may have suffered significant life trauma.

Document management: Homes North management will ensure that records relating to any actions taken under this policy are appropriately retained. These must be promptly attached to the relevant tenancy record within BASIX wherever possible.

Where possible, all documentation must be attached to a tenant's file in BASIX within 48 hours.

4. Authority

The Chief Executive Officer (CEO) is given general authority and responsibility for implementing processes and procedures necessary to ensure compliance with this Policy.

The CEO is authorised and required to ensure that the Policy is implemented including by generating the following in respect of each policy:

- Management directives in the form of a CEO approved policy
- Procedures or Work Instructions
- Training Programs

In developing the above, the Senior Management Group (SMG) must ensure that each of the elements:

- Does not breach the law in the relevant jurisdiction
- Does not breach the limitations set by the policy itself

- Does not breach any other policy set by the company
- Is consistent with the organisations Points of Culture/values

5. Information

Documents related to this policy	
Related policies	<ul style="list-style-type: none"> • Rent Charging (Social Housing) Policy • Affordable Housing Policy
Forms or other organisational documents	<ul style="list-style-type: none"> • Acknowledgement: adapted by permission from North Coast Community Housing Company Ltd, - COVID-19 Response Policy 202003-v1.0