



SA Community Housing Performance Report 2020-2022



Government of South Australia
SA Housing Authority



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Message from the Registrar

I am pleased to present the SA Community Housing Performance Report 2020-2022 – the annual performance review of the community housing sector in South Australia.

This sector report shows how Community Housing Providers (CHPs) have performed against key performance metrics during the 2020-2021 financial year. It also highlights the sectors size, property portfolio, and the regulatory activities of the Registrar's office during 2021-2022.

The impacts of the COVID-19 pandemic were particularly felt during the period covered by this report. CHPs adjusted to remote working environments, temporary changes to rental and eviction requirements under tenancy laws, and service delivery arrangements for tenancy inspections and maintenance activities. Despite these challenges, the sector continued to show its resilience and achieved strong service delivery results during 2020-2021 that included:

- responsive and fair complaint handling practices
- high levels of tenant satisfaction
- high levels of responsiveness to tenant repair requests
- downward trend in eviction numbers
- improved vacancy turnaround times

The sector also positioned itself to deliver on further development and growth activity by obtaining low cost, long-term fixed rate loans with the National Housing Finance Investment Corporation (NHFIC). This will quarantine CHPs from the current interest rate rises on existing loans, whilst the prudential financial settings from the National Regulatory System for Community Housing (NRSCH) enable CHPs to absorb additional financial pressures from the current economic environment.

The sector has emerged from 2020-2021 in a sound financial position with:

- satisfactory levels of profitability across the sector
- adequate cash reserves and operating net cashflows to absorb changes in the current economic environment
- prudentially sound loan levels

With the ongoing challenges of the COVID-19 pandemic and the changing economic environment, the regulatory activities during 2021-2022 remained proportionate and outcome focused on risks, such as vacancy turnaround performance, development activities, and debt management. I also sponsored an industry led good practice complaint management framework, which strengthens the commitment the sector has to service delivery.

I look forward to continuing to work with the sector to promote better outcomes and contribute to a well governed and managed community housing sector.

Craig Thompson
Registrar for South Australia



National Regulatory System for Community Housing (NRSCH)

The regulatory system is administered under a federated model, the National Regulatory System for Community Housing (NRSCH). Participating jurisdictions include Queensland, New South Wales, Australian Capital Territory, Tasmania, South Australia, and Northern Territory, enacting mirror National Law and a National Regulatory Code (NRC). In South Australia, this mirror legislation is contained within the *Community Housing Providers (National Law) (South Australia) Act 2013* (the CHP Act).

The regulatory system is designed to contribute to a well governed and managed community housing sector and provide a platform for the ongoing development and viability of the community housing sector across Australia. Its core purposes include improving tenant outcomes and protecting vulnerable tenants, protecting government funding and equity, and ensuring investor and partner confidence.

The regulatory system ensures the transparency and accountability of the community housing sector through a National Register, the provision of our compliance reports to the SA Housing Agency and the National Housing Finance Investment Corporation (NHFIC), and public reporting of performance through this publication.

The NRC sets performance outcomes and requirements that CHPs must demonstrate their ongoing compliance with.

The seven NRC performance outcomes are:

- PO1** Tenant and housing Services
- PO2** Housing assets
- PO3** Community engagement
- PO4** Governance
- PO5** Probity
- PO6** Management
- PO7** Financial viability



Sector information

This report provides data and analysis for CHPs where SA is the primary registrar. The data contained in the report is provided by CHPs as part of their scheduled assessments to demonstrate their compliance with the NRC.

Community Housing Providers (CHPs)

The community housing sector is a major provider of housing services in SA with over 13,000 households residing in community housing across metropolitan, regional, and remote areas of SA. Community housing provides rental housing to low-to-moderate income and special needs households.

CHPs are not-for-profit organisations that own, manage, and develop their own properties and fund their operations from the rents collected.

Registered CHPs range from large complex businesses developing and managing thousands of properties across multiple jurisdictions to small tenant managed organisations. CHPs are classed into Tiers based on the level of risk arising from the scale and scope of their community housing activities, which in turn determines the intensity of regulatory engagement and oversight.

| | |
|---------------|---|
| TIER 1 | <ul style="list-style-type: none"> Registered CHPs operate on a large scale and have ongoing development activities. Tier 1 status is reserved for CHPs with ongoing development activities at the high end of the spectrum, or 750+ properties with ongoing development activities at the lower end of the spectrum. |
| TIER 2 | <ul style="list-style-type: none"> Registered CHPs operate on a moderate scale of property and tenancy management and may undertake small scale developments. Most Tier 2 CHPs manage between 200-750 properties and may also undertake ongoing small development activities. |
| TIER 3 | <ul style="list-style-type: none"> Tier 3 registered CHPs mostly operate on a smaller scale of property and tenancy management and have no ongoing development activities or one-off/very small-scale development activities. All Tier 3 CHPs in SA have less than 200 properties. |

Tier 1 and 2 CHPs are subject to annual compliance assessments as any serious non-compliance has

the potential to impact large numbers of tenants and assets. Tier 3 CHPs have compliance assessments conducted biennially.

Property information

Property numbers have been collected from CHPs who enter their data directly into the Community Housing Regulatory Information System (CHRIS). Tier 3 CHPs account for 48% of SA's registered CHPs as illustrated in Figure 1.

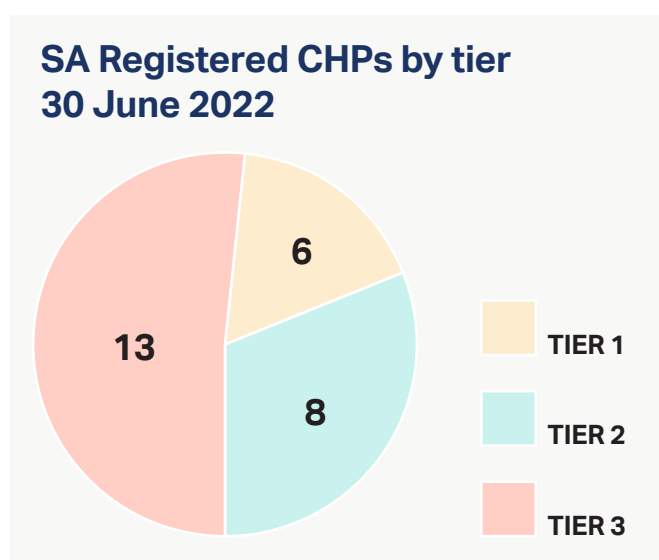


Figure 1: Registered SA CHPs by tier as at 30 June 2022

Tables 1 and 2 summarise the number of properties regulated by the SA Registrar.

As demonstrated in Table 1, most properties are concentrated amongst Tier 1 and Tier 2 CHPs, despite the majority of CHPs in SA being Tier 3.

| CURRENT TIER | NUMBER OF CHPs | TOTAL PROPERTIES |
|---------------|----------------|------------------|
| TIER 1 | 6 | 9,747 |
| TIER 2 | 8 | 2,669 |
| TIER 3 | 13 | 325 |
| TOTAL | 27 | 12,741 |

Table 1: Properties of registered CHPs by tier as at 30 June 2022

Table 2 illustrates the difference between the number of properties located in SA and the number of properties where the SA Registrar has primary regulatory oversight regardless of property location.

| | TIER 1 | TIER 2 | TIER 3 | TOTAL |
|---|--------|--------|--------|--------|
| Properties located in SA | 11,100 | 2,344 | 329 | 13,773 |
| Properties where SA Registrar has regulatory oversight | 9,747 | 2,669 | 325 | 12,741 |

Table 2: Property numbers by tier and property numbers by tier where SA Registrar has responsibility regardless of property location as at 30 June 2022

The difference in properties located in SA compared to properties where the SA Registrar has regulatory oversight is due to some CHPs operating primarily in another jurisdiction.

For example, Community Housing Ltd (CHL) is a Tier 1 provider with over 5,000 properties managed throughout Australia, including over 1,000 properties in SA. As CHL has its primary jurisdiction in NSW, the 1,047 properties located in SA form part of the NSW Registrar's regulatory oversight. Similarly, Amelie Housing is a Tier 1 CHP with hundreds of properties located in SA; however, their primary jurisdiction and Registrar is NSW. Despite this, Office of Housing Regulation (OHR) remains involved in complaints and enquiries concerning all SA properties.

From a Tier 2 perspective, Salvation Army Housing (SAH) has properties located in SA, Tasmania, and Western Australia. As SAH's primary jurisdiction is SA, the properties located in Tasmania and Western Australia have regulatory oversight from the SA Registrar.

Aboriginal Community Housing Ltd, which has its primary jurisdiction in NSW, has several properties in metropolitan Adelaide, Port Augusta, Whyalla Jenkins, and Whyalla Stuart, which have regulatory oversight from the NSW Registrar.

Table 3 provides a summary of the 13,773 properties by location, which shows that most of the community housing in SA is located within metropolitan Adelaide.

| LOCATION | PROPERTIES |
|------------------------------|---------------|
| Adelaide Central and Hills | 2,118 |
| Adelaide – North | 3,990 |
| Adelaide – South | 3,190 |
| Adelaide – West | 2,738 |
| Barossa – Yorke – Mid North | 405 |
| South Australia – Outback | 240 |
| South Australia – South East | 1,092 |
| TOTAL | 13,773 |

Table 3: Location of SA Community housing properties as at 30 June 2022

Table 4 illustrates the stock profile of community housing, showing that the majority (78%) of properties are utilised for long term housing.

| HOUSING PROGRAM | NUMBER OF PROPERTIES |
|------------------------------|----------------------|
| Affordable Housing | 542 |
| Boarding/ Rooming House | 6 |
| Crisis | 71 |
| Long term community housing | 10,796 |
| NRAS | 845 |
| Other | 190 |
| Private Rental/Housing | 73 |
| SDA | 280 |
| Short to medium term housing | 970 |
| TOTAL | 13,773 |

Table 4: SA Properties by housing program as at 30 June 2022

The number of community housing properties is forecast to increase in future as many Tier 1 and Tier 2 CHPs have development programs to renew and grow their property portfolios.

Mergers

In the context of community housing, a merger involves the transfer of assets (properties, bank balances), liabilities (loans) and tenancies from one CHP to another. This can occur for a variety of reasons, such as volunteer fatigue, internal management capacity, and financial viability.

From 2017-2018 to 2021-2022 there has been a reduction in the number of CHPs in SA, predominantly amongst Tier 3 CHPs who are merging with larger registered CHPs. During 2021-2022, one Tier 2 CHP had their tier status changed to Tier 1 due to their increased development activities.

Table 5 illustrates the reduction of registered CHPs in SA.

| | TIER 1 CHPs | TIER 2 CHPs | TIER 3 CHPs | TOTAL |
|-----------|----------------|----------------|----------------|-------|
| 30 JUN 18 | 5 | 8 | 30 | 43 |
| 30 JUN 19 | 5 | 8 | 22 | 35 |
| 30 JUN 20 | 5 | 9 | 15 | 29 |
| 30 JUN 21 | 5 | 9 | 13 | 27 |
| 30 JUN 22 | 5 | 8 | 13 | 27 |

Table 5: Number of SA Registered CHPs by tier from 2017-2018 to 2021-2022

Table 6 shows the SA registered CHPs that have cancelled their registration with the NRSCH.

| PROVIDER | TIER | CANCELLATION DATE |
|---|------|----------------------|
| Hindmarsh Housing Co-Operative Inc. | 3 | 7/8/2020 |
| Waikerie Community Senior Citizens Home Inc | 3 | 21/10/2020 |
| Housing Plus SA Incorporated | 3 | 22/10/2020 |

Table 6: SA CHPs that have cancelled their NRSCH registration

Table 7 shows newly registered CHPs.

| PROVIDER | TIER | REGISTRATION DATE |
|----------|------|-------------------|
| SYC Ltd | 3 | 26/10/2021 |

Table 7: SA CHPs that have registered with the NRSCH

Table 8 outlines the CHPs that have cancelled their registrations and lists the larger providers they have merged with.

| PROVIDER | TIER | MERGED PROVIDER | TIER |
|---|------|--------------------------|------|
| Hindmarsh Housing Co-Operative Inc | 3 | Uniting SA Housing Ltd | 1 |
| Waikerie Community Senior Citizens Home Inc | 3 | Anglicare SA Housing Ltd | 1 |
| Housing Plus SA Incorporated | 3 | Uniting SA Housing Ltd | 1 |

Table 8: SA CHP Mergers from June 2020 to June 2022

UnitingSA Housing Ltd is currently a Tier 1 CHP. However, at the time of merging with Hindmarsh Housing Co-Operative Inc and Housing Plus SA Incorporated, UnitingSA Housing Ltd was a Tier 2 CHP. There are currently several mergers in progress, which at this stage are all Tier 3 CHPs looking to merge with Tier 1 and Tier 2 CHPs.

Regulatory activities

Assessing ongoing compliance of providers

This section of the report relates to SA's compliance related activities during 2021-2022.

Once registered, CHPs must submit a minimum set of evidence supporting their ongoing compliance with the NRC, described as a standard compliance assessment.

The frequency of standard compliance assessments depends on the CHP's Tier. Tier 1 and Tier 2 CHPs have a standard compliance assessment undertaken annually, whilst Tier 3 CHPs are undertaken every two years.

During 2021-2022, 21 out of 27 of all SA registered CHPs went through a standard compliance assessment. As shown in Table 9, Between 1 July 2021 and 30 June 2022, over 66% of compliance assessments completed in 2021-2022 were for Tier 1 and Tier 2 CHPs.

| | STANDARD COMPLIANCE ASSESSMENTS |
|--------|---------------------------------|
| TIER 1 | 5 |
| TIER 2 | 9 |
| TIER 3 | 7 |
| TOTAL | 21 |

Table 9: Standard compliance assessments completed in 2021-2022

After compliance assessments were conducted, one Tier 2 CHP was elevated to Tier 1 status.

For the purposes of table 9, this CHP was recorded as Tier 2 in accordance with the classification it held at the commencement of the compliance assessment.

Assessing each performance outcome

The evidence submitted by CHPs is assessed against each applicable performance outcome under the NRC. The possible results of the assessment for any performance outcome are:

Compliant - The CHP has submitted sufficient evidence to demonstrate ongoing compliance with the performance outcome.

Compliant with recommendations - The CHP has submitted evidence to demonstrate a minimum level of compliance with a performance outcome but needs to take further action to fully comply. The recommendations will generally fall into one or more of the following categories:

- relatively minor and the issue can be resolved in a short period;
- the deadlines for the CHP reaching compliance are reasonable and likely to be met (i.e., evidence of progress has been observed);
- the overall impact on financial viability and services to residents is relatively insignificant; or
- accepted by and can be completed by the CHP (i.e., they have the resources, track record, expertise).

Non-compliant - The CHP has not submitted sufficient evidence to demonstrate ongoing compliance with performance requirements of the NRC.

Improvement opportunities - Observations made where the provider is compliant but may need to take action to maintain compliance in the future. They may relate to low level risk areas, or activities affected by environmental issues.

Table 10 shows the performance outcome results for Tier 1 and Tier 2 CHPs, whilst Table 11 shows the results for Tier 3 CHPs.

| TIER 1 AND 2 | COMPLIANT | COMPLIANT WITH RECOMMENDATIONS | NON-COMPLIANT | IMPROVEMENT OPPORTUNITIES |
|-------------------------------|-----------|--------------------------------|---------------|---------------------------|
| Outcome 1 Tenants and Housing | 100% | 0% | 0% | 0% |
| Outcome 2 Housing Assets | 86% | 14% | 0% | 0% |
| Outcome 3 Community | 100% | 0% | 0% | 7% |
| Outcome 4 Governance | 100% | 0% | 0% | 0% |
| Outcome 5 Probity | 93% | 7% | 0% | 0% |
| Outcome 6 Management | 93% | 7% | 0% | 14% |
| Outcome 7 Financial Viability | 93% | 7% | 0% | 36% |

Table 10: Outcome of Assessment against each Performance Outcome for Tier 1 and 2 CHPs in SA in 2021-2022

Of the five registered Tier 1 CHPs in 2021-2022:

- five CHPs (100%) were assessed as fully compliant with all performance outcomes; and
- three CHPs (60%) were issued with improvement opportunities.

Of the nine registered Tier 2 CHPs in 2021-2022:

- nine CHPs (100%) were assessed as compliant or compliant with recommendations with all performance outcomes; and
- six CHPs (67%) were assessed as fully compliant with all performance outcomes; and
- three CHPs (33%) were issued with improvement opportunities.

| TIER 3 | COMPLIANT | COMPLIANT WITH RECOMMENDATIONS | NON-COMPLIANT | IMPROVEMENT OPPORTUNITIES |
|-------------------------------|-----------|--------------------------------|---------------|---------------------------|
| Outcome 1 Tenants and Housing | 72% | 14% | 14% | 0% |
| Outcome 2 Housing Assets | 43% | 43% | 14% | 57% |
| Outcome 3 Community | 100% | 0% | 0% | 0% |
| Outcome 4 Governance | 67% | 29% | 14% | 29% |
| Outcome 5 Probity | 71% | 29% | 0% | 43% |
| Outcome 6 Management | 71% | 29% | 0% | 29% |
| Outcome 7 Financial Viability | 43% | 43% | 14% | 29% |

Table 11: Outcome of assessment against each performance outcome for Tier 3 CHPs in SA in 2021-2022

Providers subject to regulatory enforcement due to non-compliance

A range of enforcement action is available to the SA Registrar where a CHP fails to demonstrate a sufficient level of compliance with performance outcomes.

During 2021-2022, a Tier 3 CHP was assessed as non-compliant overall with the NRC and issued with a Notice of Non-Compliance to remedy the issues. This CHP is in the process of merging with a Tier 2 CHP and will have its registration cancelled after the merger is complete.

In 2021-2022 one Tier 3 continued to have its affairs managed by a Statutory Manager appointed by the SA Registrar after being investigated for not complying with the NRC. Its failure to comply was serious and required urgent action. The properties and tenancies of this CHP are in the process of being transferred to another registered CHP following the completion of a competitive procurement process. This CHP will have its registration cancelled after the transfer officially takes place.

Complaints

The NRSCH requires registered CHPs to have accessible and efficient complaints management systems. In the first instance most complaints are raised directly with the CHPs and responded to as part of their complaint management processes.

Performance Outcome 1 (Tenant and Housing Services) includes the following indicators that CHPs must demonstrate with respect to good practice for handling complaints and appeals:

- information is readily available and promoted to tenants regarding complaints and appeals; and
- the registered CHP manages complaints and appeals promptly and fairly; and
- the registered CHP regularly monitors the effectiveness of the complaints and appeals system.

To support these regulatory indicators, OHR funded the Community Housing Council of South Australia to develop a sector wide good practice 'Complaints Management Framework for Community Housing Providers' during 2021-2022.

The OHR reviews registered CHPs ongoing compliance against these indicators during their annual compliance assessments. There were no recommendations or improvement opportunities raised with Tier 1 and Tier 2 CHPs with respect to complaint and appeal handling.

Registered CHPs are required to keep complaint registers, which record the dates and outcomes of all complaints they receive. In 2020-2021, Tier 1 and Tier 2 CHPs recorded 392 complaints received directly

from tenants or members of the public, representing 3% of total tenancy units under management within the sector. This figure may include multiple complaints received from a single tenant.

OHR also receives complaints directly from the public in relation to a CHPs compliance with the National Law, including its adherence to its complaints management process.

As **Table 12** illustrates there has been an increased number of complaints and enquiries relating to CHPs since 2017-2018. This correlates with increased property numbers owned and managed by the community housing sector.

| | 2017 -2018 | 2018 -2019 | 2019 -2020 | 2020 -2021 | 2021 -2022 |
|-------------------|---------------|---------------|---------------|---------------|---------------|
| COMPLAINTS | 38 | 51 | 98 | 101 | 90 |
| ENQUIRIES | 47 | 71 | 46 | 134 | 134 |

Table 12: Complaints and enquiries handled by OHR from 2017-2018 to 2021-2022

Table 13 provides an insight into the origin of complaints that OHR received from 2016-2017 to 2021-2022. Many cases originate from direct contact by the tenant, members of the public (e.g., neighbours or support agencies), or are raised by a Member of Parliament or the Minister.

Many of the complaints related to service delivery or anti-social behaviour concerns and were referred back to CHPs to address through their complaint management processes. Where OHR did investigate a complaint, CHPs consistently demonstrated they were responding to complaints promptly and fairly.

| COMPLAINT ORIGIN | 2017 -2018 | 2018 -2019 | 2019 -2020 | 2020 -2021 | 2021 -2022 |
|-------------------------|---------------|---------------|---------------|---------------|---------------|
| TOTAL | 38 | 51 | 98 | 101 | 90 |
| Ministerial Office | 35 | 35 | 33 | 38 | 38 |
| Tenant | 2 | 13 | 41 | 49 | 38 |
| Member of Public | | 3 | 19 | 12 | 9 |
| Advocate | | | 1 | | 1 |
| Anonymous | | | 1 | 2 | 2 |
| Former Tenant | | | 1 | | 1 |
| Non-Registered Provider | 1 | | | | |
| Provider Employee | | | 1 | | 0 |
| Third Party | | | 1 | | 1 |

Table 13: Complaint origin 2015-2016 to 2021-2022

Sector Performance

Tenant surveys

Tenant satisfaction surveys are a key indicator of the consumer experience with a CHP. Tier 1 and Tier 2 CHPs are required to survey their tenants every two years. Most CHPs outsource this to an external party to conduct the survey. In recent years the Community Housing Industry Association (CHIA) NSW has been the most popular external party to conduct tenancy surveys for South Australian CHPs. Results of the survey are self-reported by CHPs in their compliance assessments.

As figure 2 demonstrates, the data is derived from a large sample size of tenants.

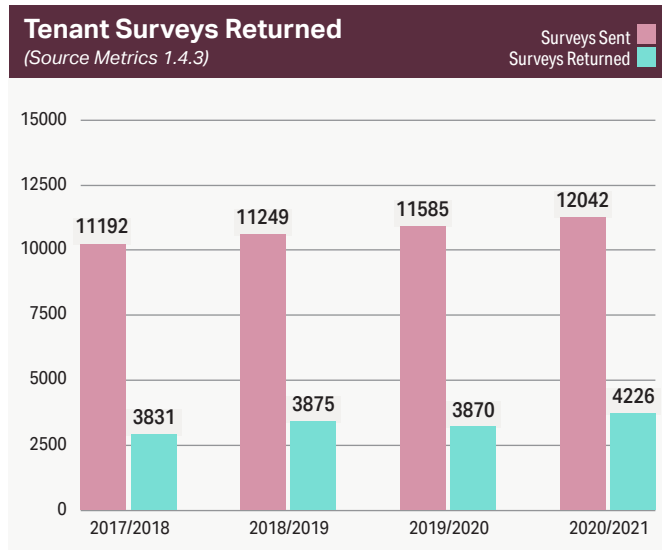


Figure 2: Tenant surveys returned/responded to 2017-2018 to 2020-2021

Tenant survey responses sent and received in recent years have been relatively consistent. In 2020-2021, there were 4,226 tenant surveys returned/responded to for Tier 1 and Tier 2 CHPs, at a response rate of 35.1%.

Tenants overall satisfied

It is a requirement for CHPs to maintain satisfaction with overall quality of housing assistance. Tenant survey results and analysis are used to demonstrate compliance.

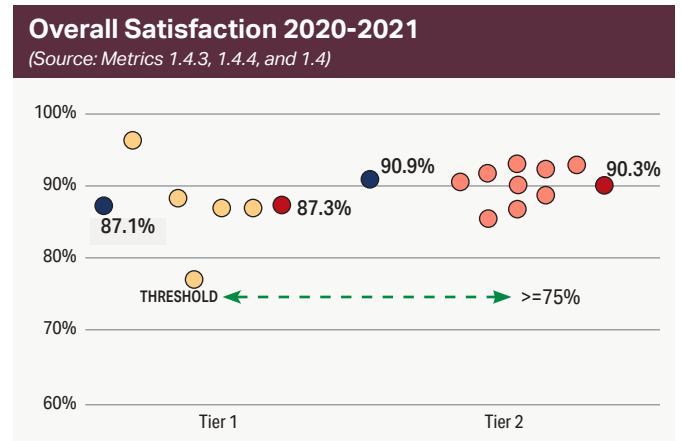


Figure 3: CHP results of tenant satisfaction with overall quality of housing services 2020-2021

The satisfaction with overall quality of housing services represents the number of tenants satisfied with overall quality of housing services as a percentage of surveys returned.

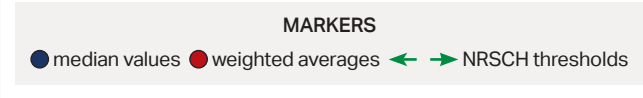


Figure 3 illustrates that community housing tenants report high levels of overall satisfaction in their CHP surveys, and most SA CHPs are performing well above the 75% green threshold line. As registered Tier 1 and Tier 2 CHPs are only required to conduct tenant surveys every two years, the impacts of COVID-19 on tenancy services are not able to be compared between 2019-2020 and 2020-2021.

Tenants satisfied with maintenance

Tenant satisfaction with maintenance is a key measure of whether services are being delivered and properties are being maintained from the tenant's perspective.

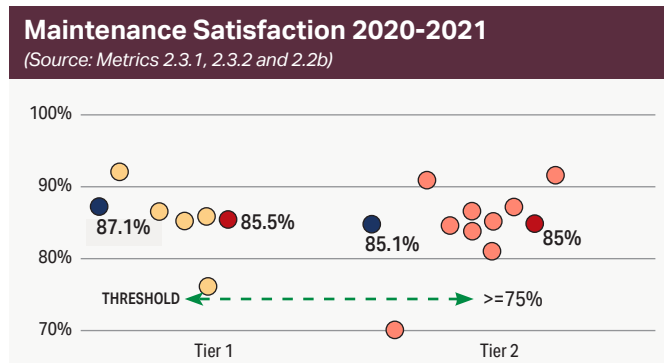


Figure 4: CHP results of tenant satisfaction with maintenance 2020-2021

Satisfaction with maintenance services represents tenants who have expressed satisfaction with maintenance services as a percentage of those answering the question in the survey. The NRSCH threshold is set at 75% of survey respondents being satisfied with maintenance services.

MARKERS
 ● median values ● weighted averages ← → NRSCH thresholds

Figure 4 illustrates that most CHPs deliver maintenance services leading to high levels of tenant satisfaction and perform above the 75% green threshold line.

One Tier 2 CHP had a satisfaction rate of 70.7% and recognised maintenance as an area for improvement. Maintenance reforms have since been implemented, which should lead to better results in future.

Responsive to repairs

Completion of urgent and non-urgent tenant repair requests is a key performance measure that shows how responsive a CHP is with addressing repairs.

Figure 5 illustrates sector trends from 2018-2019 to 2020-2021.

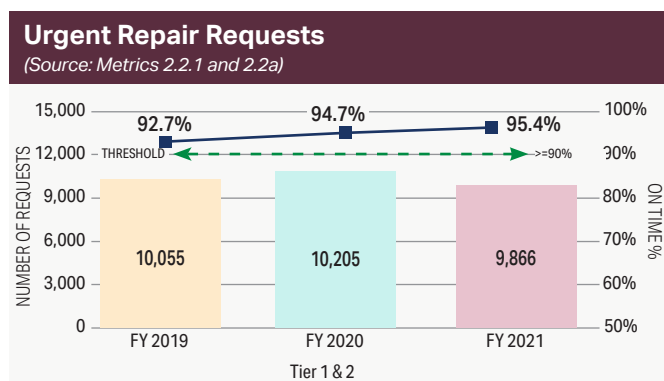


Figure 5: Sector trends 2018-2019 to 2020-2021 for the number and completion of urgent repair requests

These results demonstrate that tenants can rely on CHPs to respond effectively (by time and outcome) to urgent repairs and perform above the 90% green threshold line.

The amount of urgent repair requests have remained fairly consistent, with steady improvement in on-time completion rates throughout the sector.

Figure 6 illustrates the urgent repair requests performance of Tier 1 and Tier 2 CHPs in 2020-2021.

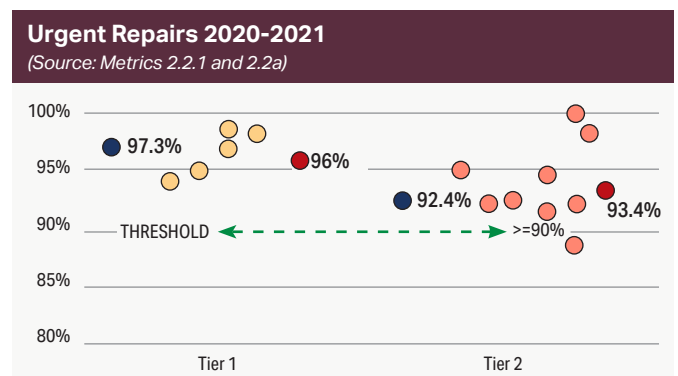


Figure 6: CHP results for urgent repairs completed within timeframe by tier in 2020-2021

The urgent repair completed on-time represents urgent repairs completed on-time as a percentage of urgent repairs requested by tenants, including requests outstanding from the previous year.

The NRSCH threshold for urgent repair on-time completion is 90% or above the green threshold line.

MARKERS
 ● median values ● weighted averages ← → NRSCH thresholds

All Tier 1 CHPs provided above-threshold results for urgent repair requests, whilst most Tier 2 CHPs had above-threshold completion rates with an average of 93.4%.

In 2020-2021, one Tier 2 CHP recorded an urgent repair completion rates of 89.0% (the NRSCH threshold is 90%). This result was a direct consequence of the CHP electing to set tighter timeframes compared to other CHPs with its completion benchmarks.

Figure 7 illustrates sector trends during 2018-2019 to 2020-2021.

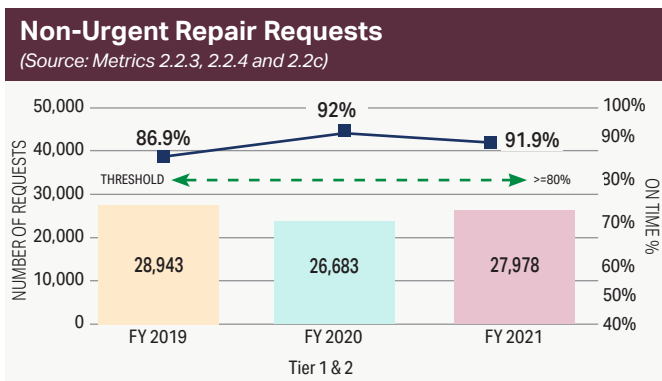


Figure 7: Sector trends 2018-2019 to 2020-2021 for the amount and completion of non-urgent repairs

The number of non-urgent repair requests varied over the past three financial years. In terms of aggregate repair request completion times there has been an overall improvement in the sector from 2018-2019. In 2020-2021, 91.9% of non-urgent repair requests were completed within timeframes, which is well above the NRSCH threshold of 80%.

Figure 8 illustrates the non-urgent repair requests performance of Tier 1 and Tier 2 CHPs in 2020-2021.

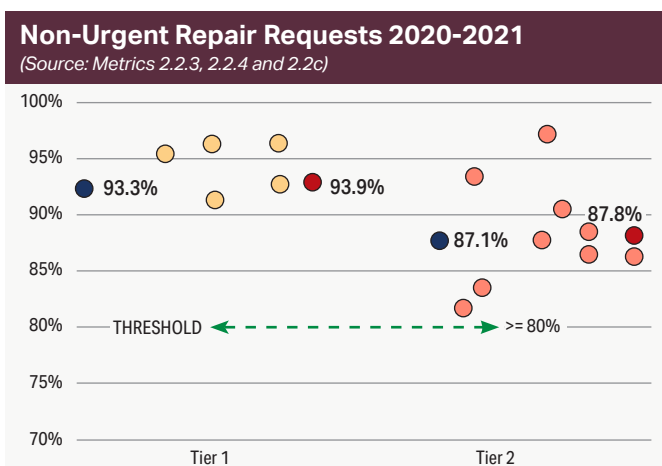
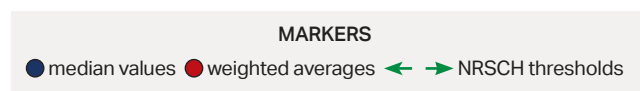


Figure 8: CHP results for non-urgent repairs completed within timeframe by tier in 2020-2021

The non-urgent repair completed on-time represents non-urgent repairs completed on-time as a percentage of non-urgent repairs requested by tenants, including requests outstanding from the previous year.

The NRSCH threshold for non-urgent repair on-time completion is 80% or above the green threshold line.



All Tier 1 and Tier 2 CHPs had non-urgent repair request completion rates above the NRSCH threshold of 80% in 2020-2021. It was noted that COVID-19 restrictions led to some non-urgent maintenance delays due to contractors being unavailable and or unable to access properties at certain times. This led to lower completion rates for some CHPs compared to previous years.

Eviction numbers to exits

Evictions as a percentage of exits is a key performance measure in determining the proportion of unsuccessful tenancies at a CHP and sector level.

An eviction is defined as an 'order granted by an independent tribunal for vacant possession, or conditions from which vacant possession will be triggered, and the subsequent termination of a tenancy'. Eviction data is useful to the extent that rates are compared between like CHPs.

Figure 9 illustrates the number of evictions for Tier 1 and Tier 2 CHPs and the evictions as a percentage of exits.

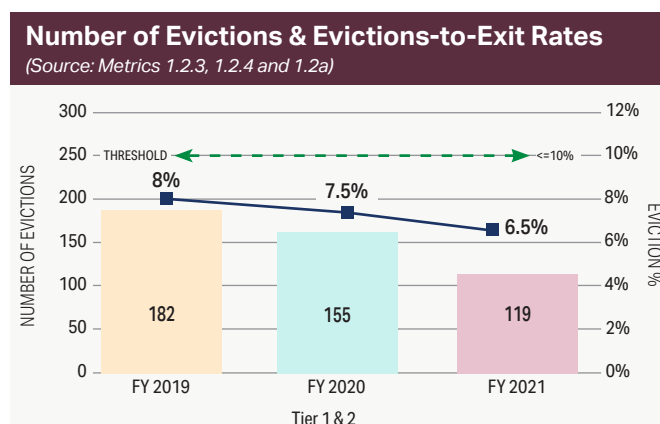


Figure 9: Sector trends between 2018-2019 to 2020-2021 for evictions as a percentage of exits

Tenants evicted as a percentage of the total number of exits for the year. The Y Axis on the graph shows the number of evictions, and the percentage of evictions relating to exits.

In 2020-2021 the aggregated eviction numbers and rates continue the downward trend observed over the previous three years. For most of 2020-2021, there were restrictions on the circumstances landlords could seek evictions for, due to temporary amendments to the *Residential Tenancies Act 1995* following the commencement of the *COVID-19 Emergency Response Act 2020*, between 30 March 2020 to 28 March 2021.

Figure 10 illustrates the eviction to exit rate for Tier 1 and Tier 2 CHPs in 2020-2021.

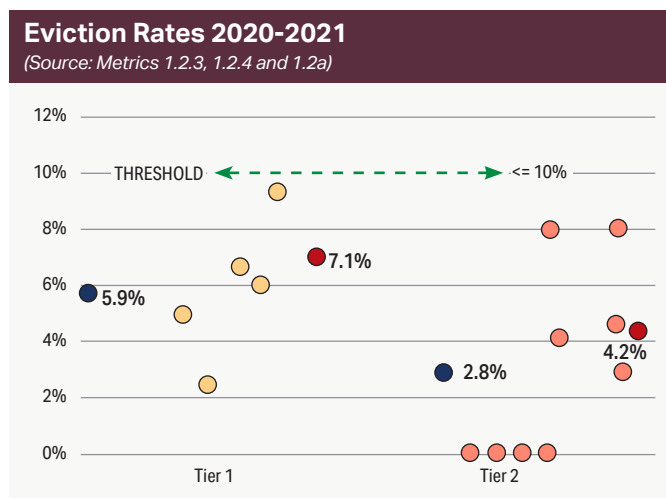


Figure 10: Eviction to Exit Rate for Tier 1 and Tier 2 CHPs in 2020-2021

The eviction to exit rate is evictions for the year divided by exits for the year. The NRSCH threshold for evictions to exits is 10%.

MARKERS
 ● median values ● weighted averages ← → NRSCH thresholds

In 2020-2021, all Tier 1 and Tier 2 CHPs had eviction rates below the 10% threshold. As part of the compliance assessment, several CHPs were requested to provide evidence of evictions, such as orders made by the South Australian Civil and Administrative Tribunal. Most evictions occurred due to rental arrears.

Rent arrears

Rent arrears is a key performance measure of a CHPs' rent collection and arrears management practices. Figures 11 and 12 illustrate that Tier 1 and Tier 2 CHPs manage rent arrears effectively, with the sector having low amounts of rental arrears.

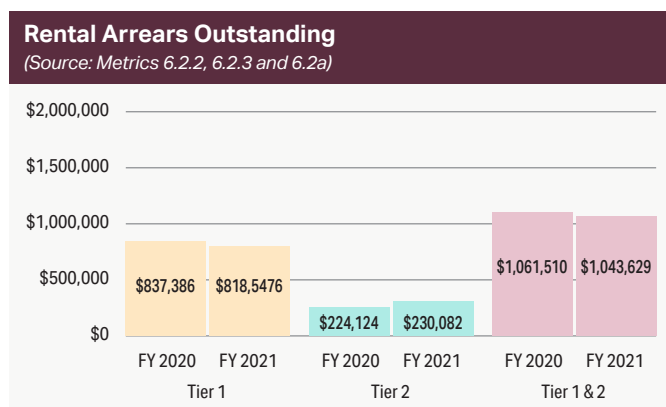


Figure 11: Rental Arrears outstanding 2019-2020 to 2020-2021

Tier 1 and Tier 2 CHPs report consistent levels of rental arrears between 2019-2020 and 2020-2021.

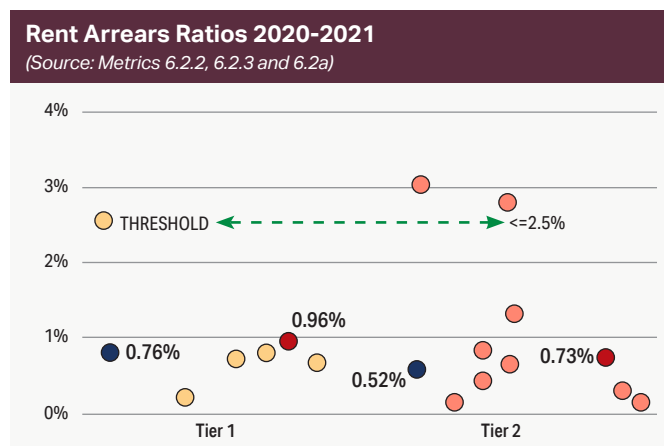


Figure 12: CHP results for rent outstanding as a proportion of total potential rental income 2020-2021

The rent arrears ratio represents the rent outstanding from current and former tenants as a percentage of total potential rental income. The threshold for rent outstanding is set at $\le 2.5\%$ of total potential rental income.

MARKERS
 ● median values ● weighted averages ← → NRSCH thresholds

Overall, most CHPs are comfortably under the rent arrears threshold of 2.5%.

There was one Tier 1 CHP that had a rent arrears ratio of 2.65%. This CHP advised improved debt management practices are forecast to improve its rent arrears ratio in future.

Two Tier 2 CHPs reported rental arrears ratio of 2.77% and 3.02% respectively, and these were attributed to short-term payment issues that are expected to be resolved. The rent arrears ratios will continue to be monitored for both CHPs in upcoming compliance assessments.

Properties Occupied

Occupancy rates measures the proportion of properties occupied and is a key measure of the utilisation of a CHP's properties.

Figure 13 illustrates all CHPs maintain high occupancy rates, with all performing well above the NRSCH threshold of 97.0%.

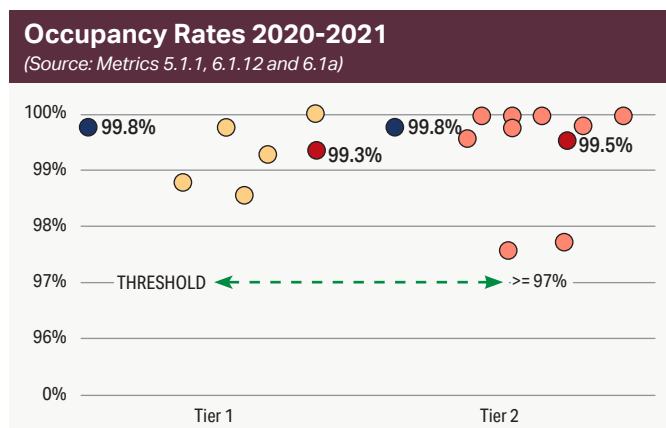


Figure 13: CHP results for occupancy rate for 2020-2021

The NRSCH occupancy rate represents the number of tenable units occupied as a percentage of the total number of tenancy units.

MARKERS
 ● median values ● weighted averages ← → NRSCH thresholds

Tier 1 and Tier 2 CHPs continued to demonstrate excellent occupancy rates with averages of 99.3% and 99.5% respectively.

Tenantable turnaround

The tenantable turnaround performance metric is a key measure of how long it takes to fill a vacancy when the property is in a fit and habitable condition. This is an efficiency measure as ongoing delays in re-tenancing properties represents a risk in terms of potential lost revenue and underutilisation of properties.

Figure 14 illustrates the tenantable turnaround performance for Tier 1 and Tier 2 CHPs.

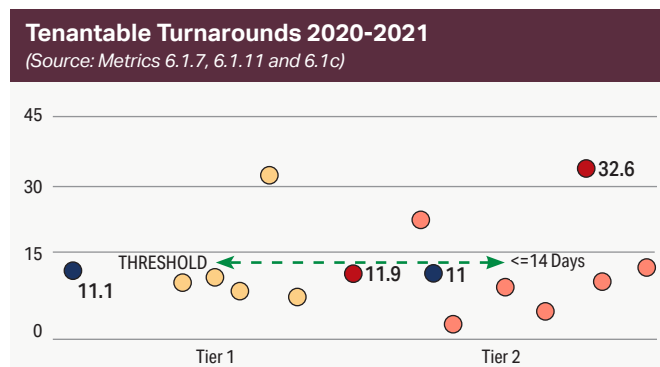


Figure 14: Average number of days to turnaround or relet vacant tenable properties in 2020-2021

Tenantable turnaround performance is the number of vacant calendar days for tenable properties, divided by the number of tenable units re-let during 2020-2021. The tenantable turnaround target threshold range is 14 days or less.

MARKERS
 ● median values ● weighted averages ← → NRSCH thresholds

Most Tier 1 and Tier 2 CHPs in 2020-2021 had tenantable turnaround times below the 14-day NRSCH threshold.

One Tier 2 CHP had a tenantable turnaround time of 120 days due to their remote locality and lack of demand in the area, which is not visible in Figure 14. Two other Tier 2 CHPs reported no tenantable turnarounds and are not represented either.

Figure 15 illustrates the number of calendar days that were vacant tenantable for Tier 1 and Tier 2 CHPs from 2018-2019 to 2020-2021.

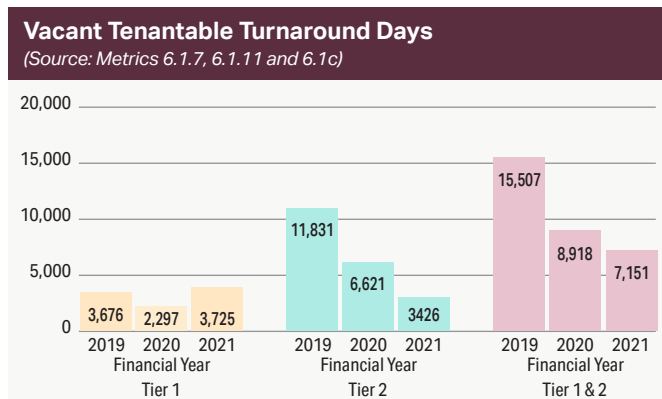


Figure 15: Vacant tenantable turnaround times from 2018-2019 to 2020-2021

There has been a large decrease in vacant tenantable days for Tier 2 CHPs from 11,831 days in 2018-2019 to 3,426 days in 2020-2021. This decrease is particularly evident in CHPs that specialise within the disability sector and are reliant upon third parties to nominate their tenants.

Untenantable turnarounds

The untenantable turnaround performance metric is a key measure of how long it takes to fill a vacancy when the property requires maintenance or refurbishment to restore it to a fit and habitable condition.

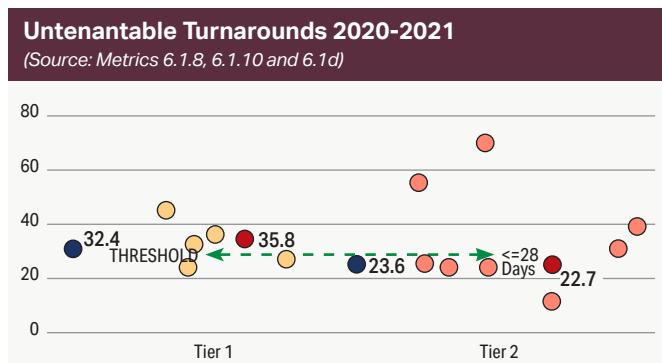


Figure 16: Average number of days to turnaround or relet vacant untenantable properties in 2020-2021

Untenantable turnaround performance is the number of calendar days for untenantable properties, divided by the number of untenantable units re-let during 2020-2021. The untenantable turnaround target threshold range is 28 days or less.



The 2020-2021 data in Figure 16 shows mixed results. One Tier 2 CHP also reported no untenantable turnarounds and is not represented on the graph.

Tier 1 CHPs showed an aggregate improvement in untenantable turnaround times with the weighted average falling from 39.1 days in 2018-2019 to 35.8 days in 2020-2021. Tier 2 CHPs reported even more significant improvements, with their weighted average untenantable turnover times decreasing from 89.6 days in 2018-2019 to 22.7 days in 2020-2021.

Vacancy Campaign

A vacancy campaign was undertaken with three Tier 1 CHPs and four Tier 2 CHPs in relation to the 2021-2022 compliance assessments. The purpose of the vacancy campaign was to ensure that CHPs were correctly classifying and reporting on their vacancy turnarounds performance.

All CHPs involved in the vacancy campaign were initially requested to provide evidence of their vacancies, which was typically a register containing the name of the tenant, address of the property, dates it was vacant, and the type of vacancy it was classified as (tenantable, untenantable, other). These vacancy registers were analysed and compared to the metric figures reported on CHRIS. Providers were asked to rectify any errors on CHRIS, which led to all numbers reconciling between CHRIS and the vacancy registers.

Meetings were held with all seven CHPs involved in the vacancy campaign where CHPs were asked to explain their turnaround process and understanding of vacancy definitions. All CHPs conducted outgoing inspections to assess required maintenance or upgrade work on the property, and therefore its vacancy classification. It was noted that CHPs with quicker turnaround times tended to have pre-exit inspections, which occurred before the final outgoing inspections. Staff responsible for allocations would work on finding a suitable tenant for the property as soon as they receive notice that the tenant was looking to vacate.

Following the meetings each CHP was sent a request for supplementary evidence. CHPs were asked to provide supporting evidence to verify the commencement and end-of-vacancy period for properties randomly selected from their vacancy register. In response, CHPs provided an array of evidence, such as ingoing/outgoing inspection reports, tenancy agreements, vacancy panel reports, and SACAT orders. The documentation provided to OHR reconciled with the vacancy register and provided assurance on the turnaround times reported by CHPs.

The vacancy campaign identified inconsistent treatment with the classification of certain vacancies, and this will be resolved with further guidance to CHPs.

Sector financial performance

The financial analysis conducted in this section is based on information submitted in the 2020-2021 compliance returns.

Data presented in Tables 14 and 15, along with Figures 18-25, are sourced from the latest 2020-2021 Financial Performance Reports (FPRs) from Tier 1 and Tier 2 CHPs.

Table 14 illustrates that the sector experienced an increase in rent revenue due to general inflation, revenue from new properties, and the acquisition of Tier 3 CHP properties through mergers. Earnings Before Interest Tax Depreciation and Amortisation (EBITDA) is a measure of profitability and used by NRSCH.

| | RENT REVENUE | OPERATING EBITDA |
|-----------|---------------|------------------|
| 2018-2019 | \$109,788,959 | \$23,973,595 |
| 2019-2020 | \$111,961,513 | \$27,218,756 |
| 2020-2021 | \$114,154,056 | \$25,729,835 |

Table 14: Revenue snapshot

Table 15 provides a comparison of CHP assets from 2019-2020 to 2020-2021.

| | HOUSING ASSETS | HOUSING LOANS |
|-----------|-----------------|---------------|
| 2019-2020 | \$1,552,437,218 | \$118,551,579 |
| 2020-2021 | \$1,563,607,754 | \$134,085,308 |
| % CHANGE | 0.72% | 13.10% |

| | NET ASSETS | TOTAL ASSETS |
|-----------|-----------------|-----------------|
| 2019-2020 | \$1,498,600,691 | \$1,731,259,500 |
| 2020-2021 | \$1,566,102,774 | \$1,817,888,989 |
| % CHANGE | 4.50% | 5.00% |

Table 15: Assets snapshot

The rise in housing loans from \$118.55 million in 2019-2020 to \$134.08 million in 2020-2021 was primarily driven by development activities. Tier 1 CHPs held 89.6% or \$120.1 million of these housing loans, which is driven by development programs and contractual requirements from public transfers to refurbish housing stock.

As of 30 June 2021, Tier 1 and 2 CHPs had total assets valued at \$1.817 billion, an increase of \$86.6 million from the previous year. Total assets held by the CHPs were primarily housing assets (\$1.563 billion).

Maintenance expenses

Figure 17 illustrates maintenance expenses per housing unit and shows a trend of increasing maintenance expenses for Tier 1 and Tier 2 CHPs.

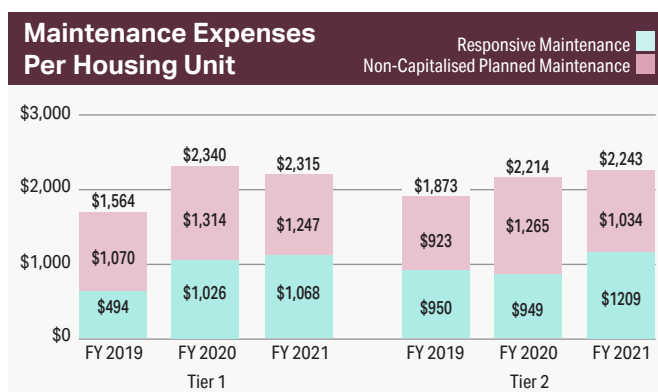


Figure 17: Maintenance expenses per housing unit from 2018-2019 to 2020-2021

Both Tier 1 and Tier 2 CHPs reported increased responsive maintenance expenses in 2020-2021 compared to previous years.

The overall spend on maintenance remained consistent between 2019-2020 and 2020-2021 for both Tier 1 and Tier 2 CHPs.

On average, non-capitalised maintenance for Tier 1 CHPs was higher than non-capitalised maintenance for Tier 2 CHPs. Many Tier 1 CHPs have Renewing Our Streets and Suburbs (ROSAS) properties with contractual obligations to refurbish them. This for example can lead to higher non-capitalised expenditure on bathroom or kitchen upgrades and replacement of hot water systems. COVID-19 also impacted on maintenance activities during 2020-2021.

Operating EBITDA margins

The operating EBITDA margin is a key measure of profitability and is monitored under the NRSCH to ensure CHPs are generating sufficient margins to achieve business goals.

Figure 18 illustrates operating EBITDA margins for Tier 1 and Tier 2 CHPs in 2020-2021 and shows that most Tier 1 and Tier 2 CHPs are performing above the NRSCH threshold.

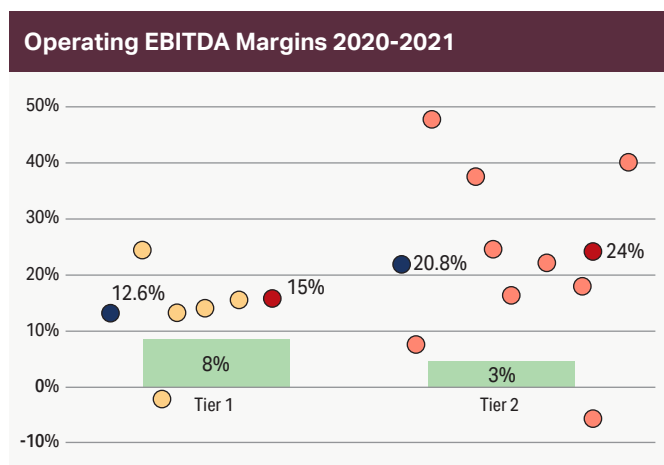


Figure 18: Operating EBITDA margin 2020-2021

Operating EBITDA margin is calculated as operating earnings before interest, tax, depreciation, and amortisation divided by operating revenue.



The threshold for Tier 1 is 8% or above, and Tier 2 is 3% or above.

One Tier 1 CHP reported an EBITDA margin of -0.1%. This was due to several unbudgeted expenses approved during the year to expedite their development program/financial feasibility modelling. Delayed rental reviews due to COVID-19 also had a negative impact on rental revenue for this CHP.

One Tier 2 CHP reported an EBITDA margin of -3.3% due to significant property expenses and other unexpected expenses during 2020-2021. However, it is expected that this CHPs' incoming Specialist Disability Accommodation (SDA) payments will return it to above the NRSCH threshold.

The average operating EBITDA margin is 15.0% and 24.0% for Tier 1 and Tier 2 CHPs respectively. These margins indicate the sector is capable of absorbing increases in expenses (e.g., surge in maintenance) and supporting more interest-bearing loans for development activities as at the end of 2020-2021.

Figure 19 illustrates the average trend in operating EBITDA margins for Tier 1 and Tier 2 CHPs from 2018-2019 to 2020-2021.

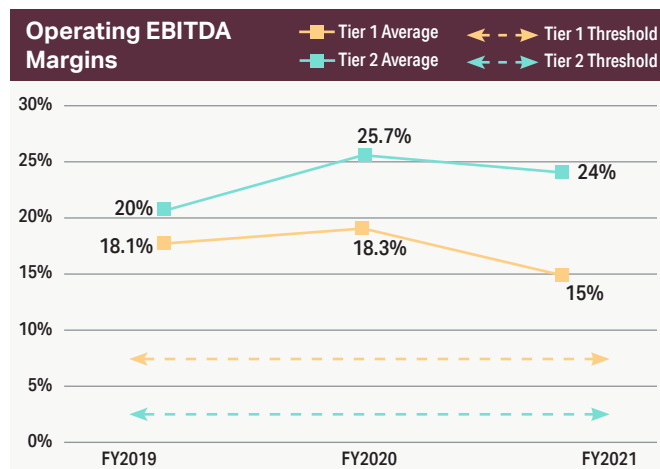


Figure 19: Average trend in operating EBITDA margins from 2018-2019 to 2020-2021

From 2019-2020 to 2020-2021 there was a decrease in EBITA margins of 3.3% for Tier 1 CHPs and 1.7% for Tier 2 CHPs respectively. Despite these declines, the average operating EBITDA margin is still well above NRSCH thresholds and enables the sector to absorb financial pressures from a changing economic environment.

Working capital ratio

The working capital ratio is a key measure of liquidity and is monitored under NRSCH to ensure CHPs have sufficient capacity to absorb adverse events.

The threshold for working capital ratio is 1.5 times or above for both Tier 1 and Tier 2 CHPs.

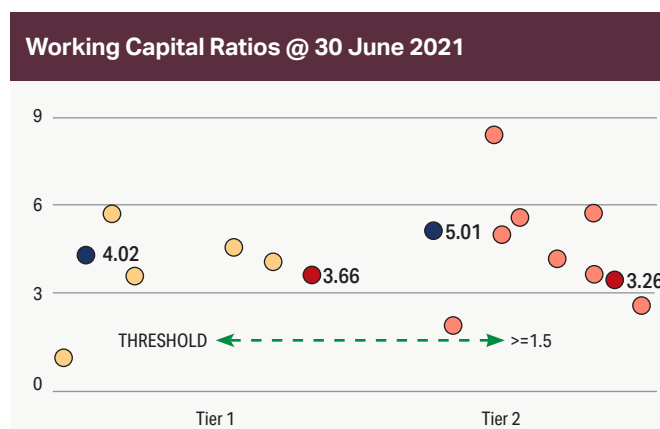


Figure 20: Working capital ratios as at 30 June 2021

Working capital ratio is calculated as current assets less restricted cash, divided by current liabilities, less unspent capital grants and accommodation bonds.



As seen in Figure 20, most Tier 1 and Tier 2 CHPs were above the NRSCH threshold and have been assessed as having adequate financial resources to withstand short term adverse events.

One Tier 1 CHP reported a working capital ratio of 1.21 times. A meeting was held with this CHP to discuss the issue, which the CHP believes is mitigated by holding minimum cash reserves of at least \$2 million.

One Tier 2 CHP had a working capital ratio of 22.69 times and is not visible on Figure 20.

Operating cash flow adequacy

Operating cash flow adequacy measures a CHP's ability to generate cash inflows from its operating activities to cover its cash outflows from those activities.

Thresholds for Operating cash flow adequacy are 1.20 times or above for Tier 1 CHPs to absorb loan finance and development risks. Tier 2 CHPs have a threshold of 1.05 times or above.

Figure 21 illustrates the operating cash flow adequacy for Tier 1 & Tier 2 CHPs in 2020-2021.

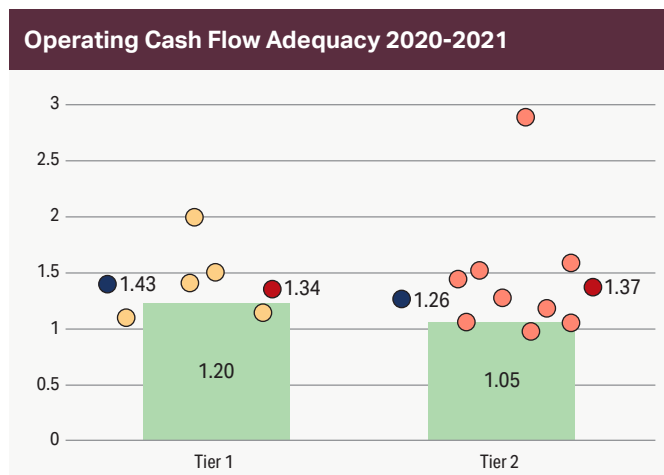


Figure 21: Operating cash flow adequacy as at 30 June 2021

Operating cash flow adequacy is calculated as operating cash inflows divided by operating cash outflows.



A ratio above 1.00 indicates that a CHP's cash inflows generated from operations are enough to meet outgoing cash outflows.

Two Tier 1 CHPs fell below the threshold. One of the Tier 1 CHPs is steadily improving its ratio, while the other only fell marginally below the threshold in 2020-2021.

Most Tier 2 CHPs had operating cash flow adequacy levels above the NRSCH threshold of 1.05 times set for Tier 2 CHPs, with ratios ranging from 0.98 to 2.86 times. One Tier 2 CHP with an operating cashflow adequacy ratio of 0.98 times has forecasted to return to an above threshold result in 2021-2022.

Gearing ratio

The gearing ratio is used to determine sustainable loan levels and is monitored under NRSCH to ensure borrowings are capped against a low yielding asset base. The threshold for gearing ratio is 30% or less.

Figure 22 illustrates that all Tier 1 and Tier 2 CHPs had gearing ratios lower than the threshold as of 30 June 2021.

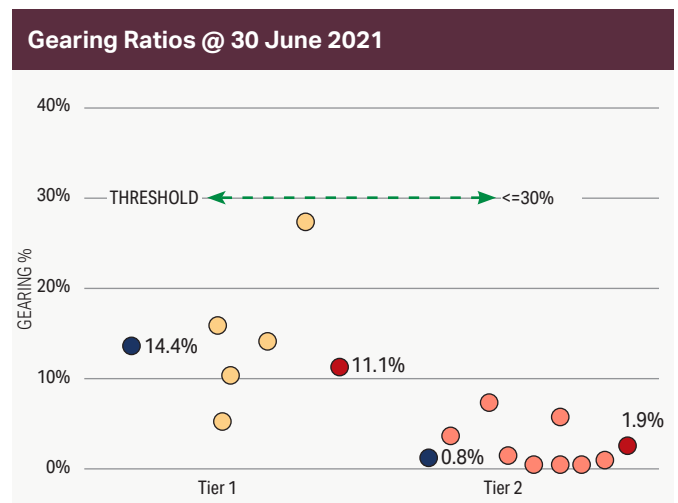
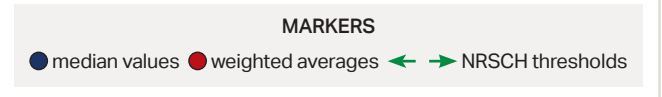


Figure 22: Gearing Ratios as at 30 June 2021

*One Tier 2 CHP has been excluded from the graph because of an accounting anomaly

The gearing ratio is calculated as total payable loans divided by total assets.



Housing Loans Source and Development

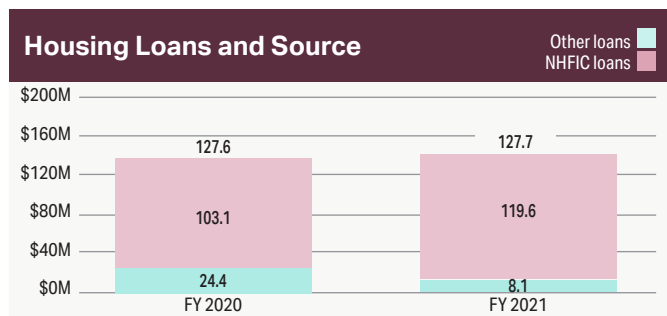


Figure 23: Housing loan levels and source for Tier 1 and 2 CHPs from 2019-2020 to 2020-2021

Most registered CHPs sourced low cost, long-term loans to support the provision of more social and affordable housing. This involved either refinancing their existing loans or taking out new loans to fund redevelopment opportunities.

During 2020-2021 there was one CHP that refinanced loans with NHFIC, which has led to NHFIC loans increasing from \$103.1 million to \$119.6 million. Loans with NHFIC are for periods ranging from 10 to 12 years with fixed interest rates ranging from 2.06% to 2.93%. The first fixed rate loans with NHFIC expires in March 2029.

Other loans are held with a range of lenders and varies in length from 2 to 30 years.

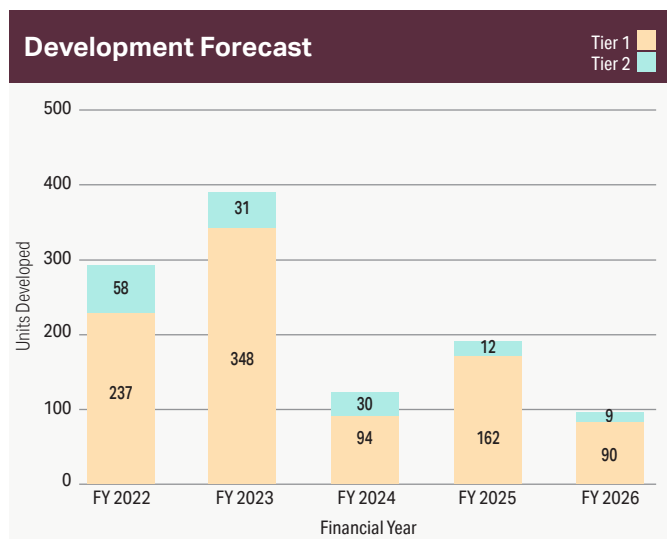


Figure 24: Development Forecasts for Tier 1 and Tier 2 CHPs

Figure 24 illustrates the amount of development that has been forecast by Tier 1 and Tier 2 CHPs. The bulk of development is forecast to come from Tier 1 CHPs. Between 2021-2022 to 2025-2026 Tier 1 CHPs are forecast to develop 931 properties and Tier 2 CHPs are forecast to develop 140 properties, respectively.

Interest coverage ratio

The interest coverage ratio (ICR) measures how many times a CHP can cover its current interest payment with its available earnings and is a key measure of their ability to service loan obligations.

The threshold for interest coverage ratio is 1.50 times or above (i.e., CHPs have the capacity to cover their interest payments 1.5 times).

Figure 25 illustrates the ICR of Tier 1 and Tier 2 CHPs and shows that most CHPs were operating above or within an acceptable range of the NRSCH threshold.

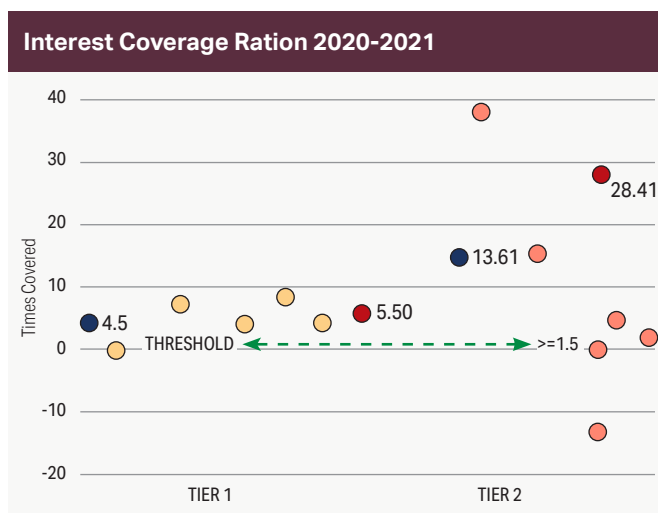


Figure 25: Interest Coverage Ratio as at 30 June 2021

Interest coverage ratio is calculated as operating EBITDA, divided by total interest expense.

MARKERS
 ● median values ● weighted averages ← → NRSCH thresholds

One Tier 1 CHP had an ICR of -0.01 times and fell below the NRSCH threshold, which was a consequence of a decrease in their operating EBITDA. This CHP is projected to increase their operating EBITDA in the future. As a result, their ICR is not considered to be a concern at this stage.

Two Tier 2 CHPs had ICRs below the NRSCH threshold, and this was due to one having a negative EBITDA margin, and the other CHP's unusual adoption of a new accounting standard. Improvement opportunities were raised in relation to these issues.

Four Tier 2 CHP's are not visible in Figure 25 due to having no borrowings, or very high ICRs.

OHR Performance

The NRSCH is designed to identify, monitor, and respond to risks that have serious consequences for tenants, funders and investors, community housing assets, and the reputation of the sector.

Registrars collect data from a Service Evaluation Survey completed by CHPs following a compliance assessment. Survey results represent the views of CHPs in relation to the provision of regulatory services and are voluntary.

Of the 14 Tier 1 and Tier 2 CHPs, six (43%) submitted a survey response for their compliance assessments during 2021-2022. The surveys contain a mix of qualitative and quantitative questions and invite CHPs to share their views on their experience in the regulatory system. Figures 26-28 illustrate CHPs responses to the Service Evaluation Survey.

How satisfied were you with NRSCH Information and resources?

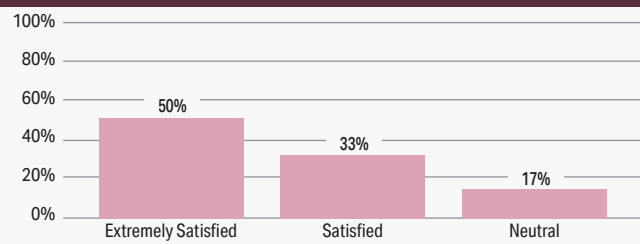


Figure 26: Survey response to satisfaction with NRSCH information and resources

The feedback from the surveys indicated that most CHPs were satisfied with the information and resources provided from the NRSCH. CHPs commented they found the Evidence Guidelines and the "Guide to completing your return - Information for providers" as particularly useful documents.

CHPs commented that there are many documents on the NRSCH website and it can be difficult to find the document required, especially when users are unfamiliar with the website. Suggestions for improvement included putting descriptors and direct links to relevant sections.

In terms of the IT system (CHRIS), CHPs believe it could be improved by allowing more than one staff member to access the portal at a time-

Only having one login does not provide accessibility and usability. If that person is away, no-one receives email communications from the portal and no-one can log in as sharing logins is against our company policy.

Other CHPs also wanted more flexibility in CHRIS and expressed the desire to be able to enter data and documents throughout the year, rather than having to wait until the compliance return commences.

Professionalism of NRSCH staff when engaging with your organisation

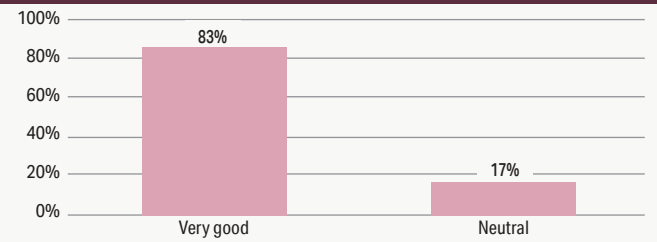


Figure 27: Survey response to professionalism of NRSCH staff

Recommendations were clear and achievable

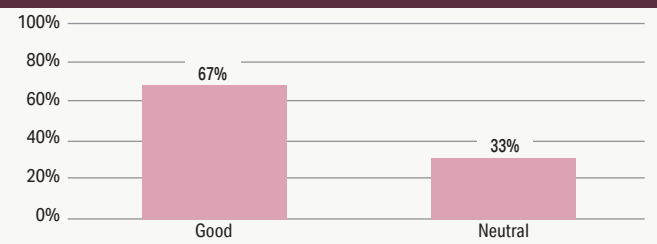


Figure 28: Survey response to NRSCH recommendations

Feedback from CHPs indicated that most believe NRSCH staff demonstrated professionalism and had a good understanding of their organisation. CHPs were also provided with the opportunity to provide comments on the compliance process and accompanying recommendations and improvement opportunities.

Overall, CHPs were satisfied with the compliance process. The main suggestion for improvement related to the timing of the compliance assessments. Many CHPs expressed a desire for the compliance assessments to be completed earlier, which would give them more time to address recommendations and improvement opportunities. Some CHPs felt the current timeframes gave them inadequate time to address the recommendations or improvement opportunities before the next compliance return.

Other suggestions included engaging with Boards directly for their insights and to have more face-to-face engagement.

CHPs also expressed a desire for more benchmarking, although some CHPs believed there is also scope for reviewing some of the current benchmarks.

Although it is a national system, individual state anomalies - such as the SA requirement to pay a contribution to the state Housing Authority - impacts on the ability to produce equal performance outcomes. Benchmarks for Untenantable properties needs to be more realistic, or definitions changed; vacancies with extensive tenant damage, backlog maintenance (in ex-public housing stock transferred) makes achievement of this benchmark impossible, particularly when a CHP has large numbers of stock transfer properties, or high needs tenancies.

This feedback has been considered and will be raised at a national level.

Acronyms & Abbreviations

CHP

Community Housing Provider – A non-government entity that provides community housing.

CRA

Commonwealth Rent Assistance – Supplementary payment for eligible households in receipt of Social Security and Family Assistance payments.

CHRIS

Community Housing Regulatory Information System – The online portal used by NRSCH to collect regulatory information and to determine compliance with the National Law.

FPR

Financial Performance Report – Used to collect financial information from CHPs that are structured to collect information by different business segments in addition to a provider’s consolidated accounts.

NHFIC

National Housing Finance and Investment Corporation – Operates three finance programs and offers finance to CHPs through one of these programs, the Affordable Housing Bond Aggregatory loans.

NRC

National Regulatory Code – The seven performance outcomes that registered housing providers must comply with as a registered community housing provider: Tenant and housing services, Housing Assets, Community Engagement, Governance, Probity, Management, and Financial Viability.

NRSCH

National Regulatory System for Community Housing – A national system of registration, monitoring and regulation of community housing providers to encourage the development, viability and quality of community housing to promote confidence in the good governance of registered community housing providers.

OHR

Office of Housing Regulation – The administrative business unit within the SA Housing Authority headed up by the South Australian Registrar appointed under the *Community Housing Providers (National Law) (South Australia) Act 2013*.

The Authority

SA Housing Authority – the State government agency that works with customers, the housing and homelessness sector and the broader community to provide better housing opportunities for all South Australians.

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Appendix

1- Registered CHPs in South Australia as of 30 June 2022 that have South Australia as their primary jurisdiction

| ENTITY NAME | ENTITY TYPE | CURRENT TIER |
|---|----------------------------------|--------------|
| Anglicare SA Housing Ltd | Company limited by guarantee | Tier 1 |
| Cornerstone Housing Limited | Company limited by guarantee | Tier 1 |
| Housing Choices South Australia Ltd | Company limited by guarantee | Tier 1 |
| Junction and Women's Housing Ltd | Company limited by guarantee | Tier 1 |
| Unity Housing Company Ltd | Company limited by guarantee | Tier 1 |
| Unity SA Housing Ltd | Company limited by guarantee | Tier 1 |
| Access 2 Place Ltd as trustee for The Disability Housing Trust of South Australia | Charitable Trust | Tier 2 |
| Common Equity Housing South Australia Ltd | Company incorporated with shares | Tier 2 |
| Julia Farr Housing Association Inc. | Incorporated association | Tier 2 |
| Minda Housing Limited | Company limited by guarantee | Tier 2 |
| Salvation Army Housing | Company limited by guarantee | Tier 2 |
| Uniting Country Housing Ltd | Company limited by guarantee | Tier 2 |
| Westside Housing Company Ltd | Company limited by guarantee | Tier 2 |
| YourPlace Housing Ltd | Company limited by guarantee | Tier 2 |
| Acacia Housing Association Incorporated | Incorporated association | Tier 3 |
| Carrington Cottages Limited | Company limited by guarantee | Tier 3 |
| Developing Alternative Solutions to Housing (DASH) Incorporated | Incorporated association | Tier 3 |
| Lansones Village Housing Cooperative Incorporated | Incorporated association | Tier 3 |
| MERZ Housing Co-operative Incorporated | Incorporated association | Tier 3 |
| North East Housing Co-operative Incorporated | Incorporated association | Tier 3 |
| Pennylane Housing Co-operative Incorporated | Incorporated association | Tier 3 |
| Salisbury Housing Co-operative Inc | Incorporated association | Tier 3 |
| Southern Housing Support Co-operative Incorporated | Incorporated association | Tier 3 |
| St Petri Lutheran Community Housing Association Nuriootpa Inc | Incorporated association | Tier 3 |
| SYC Ltd | Company limited by guarantee | Tier 3 |
| SYP community Housing Association Incorporated | Incorporated association | Tier 3 |
| Town & Country Housing Incorporated | Incorporated association | Tier 3 |



**Government
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