

Hardship Policy

1. Purpose

This Policy describes how Compass will support tenancies at risk due to financial hardship.

2. Scope

This is a group policy and applies to Compass and the Group of entities it controls (Compass Group). References to Compass in this policy refer to all Compass Group companies unless specified otherwise.

The policy applies to tenants in homes owned and managed by Compass under social and affordable housing programs.

The policy may not apply to tenants where Compass manage properties on behalf of private landlords under a 'fee for service' agreement if the property owner has their own hardship policy. Tenants in those properties may apply for hardship under the property owner's hardship policy.

3. Definition

Financial hardship is when a person is willing to but is having difficulty paying their rent, debts, and reasonable living expenses because of factors beyond their control such as:

- loss of ongoing employment
- significant medical or emergency expenses
- have been financially affected by the ongoing COVID-19 crisis

Reasonable living expenses includes, but is not limited to rent, groceries, electricity, minimum loan repayments, school fees, medical costs etc.

4. Policy Statement

Compass support our tenants to find affordable housing for their circumstances and sustain their tenancies. Compass assist tenants experiencing financial stress through a range of responses including assisting them to manage rent and non-rent arrears through flexible payment arrangements, providing training such as our 'Rent It Keep It' program to assist them manage their finances and linking them to external agencies that offer referral services or link them with support programs including those that provide financial assistance, financial counselling and / or budgeting support.

Where a tenant informs us, or we become aware, they are unable to meet their rent or non-rent payments due to financial hardship. Tenants may apply for relief due to financial hardship by completing

an Application for Hardship form and providing supporting information including evidence that they have attempted to participate in activities to assist them with managing finances and financial stress.

The Application for Hardship form is available from Compass website, from your local office or by calling 1300 666866 and requesting a copy be sent.

Compass will treat all tenants applying for financial hardship sensitively, consider each application for financial hardship based on the tenant's individual circumstances and treat all tenants fairly and reasonably when assessing financial hardship applications. Compass may contact the tenant and request additional information as part of the assessment process.

Compass will help tenants experiencing financial hardship in several ways including referrals to other agencies that can assist and support them and providing financial relief as described below.

Rent Arrears

For homes managed by Compass under social and affordable housing programs tenant rents are charged at lower than private market rents based on government community housing rent policies or affordable housing rent policies. The aim of these policies to charge affordable rents for tenants based on their income and family circumstances and tenants are expected to comply with the evidence requirements and notify Compass of changes of circumstances that affect their income and / or rent calculations.

Where a tenant is in rent arrears Compass will request the tenant enter a payment plan and enter into a Centre Pay Deduction (CPD) arrangement where they receive income payments from Centrelink and do not currently have this arrangement in place (or by other means) if they do not receive Centrelink payments). No Compass managed tenancies will be terminated and evicted if the Tenant agrees to and maintain these arrangements.

Where the Tenant does not agree or maintain these arrangements actions will be taken in accordance with Compass Arrears and Debt Management Policy except where a tenant applies for financial hardship under this policy and can demonstrate that:

- any 1 or more rent-paying members of the household:
 - have lost employment or income or had work hours or income reduced due to factors outside their control, such as the COVID-19 pandemic or
 - have had to stop working due to illness or restrictions such as stay at home public health orders, and
- their household's weekly income has significantly reduced to level where they are willing to do so but are no longer meet their rent, debts, and reasonable living expenses.

A “rent-paying member” of a household is any person who regularly contributes towards the rent payable under a residential tenancy agreement. This includes a member of a household who regularly contributes to the rent but is not named on the rental agreement (e.g., an adult child who contributes to the rental payments of their parent/s).

Household's weekly income is the net income earned (after tax and/or business-related expenses). It includes any government assistance that is received – either before and/or since COVID support payments were introduced by the NSW and Commonwealth Governments. Savings and superannuation are not included in weekly income.¹

To confirm a tenant is eligible for financial hardship Compass may request reasonable evidence such as:

- payslips or bank statements showing reduced income
- documentation from an employer showing job termination/stand-down or reduced hours
- evidence of a business closure or business records showing loss of takings
- Centrelink confirmation of eligibility for financial assistance
- medical certificates

Ways Compass will assist a tenant that meets eligibility for financial hardship will depend on a tenant's individual circumstances and may include:

- waiving rent for a period,
- reducing rent now and repaying this later in addition to usual rent payments,
- reviewing and reducing the repayment amount of existing arrears payment plans, or
- a combination of these.

Non rent Arrears

Water charges

Compass will assist tenants experiencing financial hardship in accordance with water charging guidelines for community housing providers and where a completed application for financial hardship has been lodged with their local office and approved by a Compass Executive Manager.

Ways Compass will assist a tenant who are struggling to meet water charges include:

- referral to a community welfare organisation that distribute water and energy vouchers. For instance, in NSW there are Energy Accounts Payment Assistance (EAPA) vouchers and Water Assistance Payment Scheme (PAS) vouchers distributed by a range of community welfare organisations and may be able to assist tenants who are having difficulties paying their water or energy bills and have been unable to make payment arrangements with their supplier. Community welfare organisations that distribute EAPA and PAS vouchers include St Vincent de Paul Society, The Salvation Army, Anglicare, Lifeline, and some community/neighbourhood or migrant resource centres.
- provide information about government programs and products as and when they are available that can assist customers to lower their utility bills.

¹ <https://www.fairtrading.nsw.gov.au/resource-library/publications/coronavirus-covid-19/property/moratorium#after11september>

- encourage tenants to contact their service providers for information about State and Federal Governments fund rebates and allowances that can help customers to pay their utilities bills.
- arrange flexible payment plans where a tenant is in arrears for their water charges.
- in some individual circumstances we may waiver or reduce water charges.

Bond Payments

Compass will assist tenants experiencing financial hardship unable to pay upfront bond payments by:

- agreeing to flexible payment plans.
- providing information about government programs and products as and when they are available that can assist customers pay their bond, such as government Bond Loans for eligible applicants.
- referral to a community welfare organisation that provides financial support.

Maintenance and other charges

Compass will assist tenants experiencing financial hardship who are unable to pay maintenance and other charges by:

- agreeing to flexible payment plans.
- referral to a community welfare organisation that provides financial support.
- Referral to low interest loan schemes such as NILS. NILS® loans are available for items that will improve the health and wellbeing for tenants and their families such as white goods, computer, furniture, medical equipment, and essential repairs. Loans are available for up to \$1200 - with a cheque drawn to the supplier. There are no fees, interest, or charges. If tenants are experiencing hardship and a loan might be of assistance, we may refer tenants to an organisation to discuss no interest or low interest loan options.

Other assistance

Compass assist tenants in financial hardship through a range of programs including our Community Food Store - The Shack Shop on the Central Coast, our Tenant Incentive Program, Rent It Keep It, Tenant Engagement Programs and will refer tenants experiencing financial hardship to other charitable organisations may be able to provide other forms of assistance, such as food vouchers or food banks.

Appealing a Hardship Application Decision

Tenants that do not agree with a decision that Compass has made under this Hardship Policy may lodge an appeal in accordance with Compass Internal Review and Appeals Policy.

5. Responsibilities

All Compass workers have an obligation to:

- familiarise themselves with and ensure they have a clear understanding of Compass policies and procedures,

- observe and implement such policies, and associated procedures in delivering services to Compass clients,
- inform Compass clients of the impact of this policy on them and assist them to understand their rights and obligations, as required,
- identify issues that require amendment to this policy document and complete the relevant documentation to propose any amendments, and
- report breaches of Compass policies or procedures.

The relevant Group Executive Manager is ultimately responsible to:

- ensure all stakeholders within their area of responsibility are informed about Compass Policies and Procedures,
- ensure appropriate processes and controls are implemented to enable the correct application of and adherence to relevant policies and procedures, and
- ensure appropriate processes and controls are implemented to enable breaches of approved Compass Policy and Procedures to be reported and managed.

6. Implementation and Review

This policy is listed on Compass Controlled Documents Register and is a controlled document requiring approval of any changes. It may not be amended or shared outside Compass without approval.

The policy is reviewed regularly and published on Compass SharePoint intranet once approved. Employees receive communications and training on new and reviewed policies and procedures.

Compass complies with relevant contractual compliance obligations and jurisdictional laws and regulations when implementing this policy. Confirmation of internal compliance with this policy is undertaken regularly.

It is the responsibility of Compass Group Executive Services (governance@compasshousing.org) to maintain and update the Compass Master Policy Document, Policy Directory and the Policy Review Register, administer the review and approval process and inform and distribute new and amended policies and procedures once approved (refer PROC-011 Policy and Procedure Development Approval).

Compass Workers should refer to [SharePoint Company Documents Policy and Procedure site](#) for the latest version which takes precedent over any uncontrolled version. If this document is printed, downloaded, or saved elsewhere from this site it becomes an uncontrolled version.

For further information contact the Responsible Officer listed under Document Information.

7. Resources and related documents

Related documents

- Internal Review and Appeals Policy (POL-001)
- Rental Bond Policy (POL-025-25)
- Affordable Housing Rent Policy (POL-025-26)
- Social Housing Rent Policy (POL-025-27)
- Arrears and Debt Management Policy (POL-025-28)
- Tenant Charges Policy (POL-025-29)
- Domestic and Family Violence Policy (POL-025-35)
- Water Usage Charging Policy (NSW) (POL-026)

Related legislation/standards

- Residential Tenancies Act 2010 (NSW)
- Residential Tenancies Regulation 2010 (NSW)
- Consumer, Trader and Tenancy Tribunal Act 2001 (NSW)
- Consumer, Trader and Tenancy Tribunal Regulation 2002 (NSW)
- Residential Tenancies and Rooming Accommodation Act 2008 (QLD)
- Residential Tenancies and Rooming Accommodation Regulation 2009 (QLD)

8. Definitions

Please refer to Compass Glossary of Definitions for Policies and Procedures. Terms and definitions identified below are specific to this policy and are critical to its effectiveness:

Term	Definition
Appeals	A Community housing appeal is defined as ‘any expression of dissatisfaction with a decision made by a social housing provider to provide or not provide a service (such as housing, transfer, or priority on the housing register) or, a decision relating to a tenant or service user’s dissatisfaction of a decision made by the organisation.’ An application for a decision to be reversed or overturned. Includes but is not limited to: • Allocation decisions; • Level of rent or rent subsidy; • Eligibility for a housing transfer; • Permission to undertake modifications; • Permission to keep pets; • Calculation of water charges;
Compass	Compass Housing Services Co. Ltd, an Australian Public Company registered in Australia under the Corporations Act 2001 (Cwlth) and as a charity with the Australian Charities and Not-for-profit Commission (ACNC) .
Compass Group	The corporate structure that includes Compass (as the Parent Company) and the boards of Subsidiary Companies, Governance Committees and advisory groups as created from time to time.
Compass NZ	Compass Housing Services Co (New Zealand) Ltd, a wholly owned subsidiary of Compass registered in New Zealand under the Companies Act 1993 (NZ) and as a charity registered with Charities NZ under the Charities Act 2005 (NZ) .
Compass Qld	Compass Housing Services Co (Queensland) Ltd, a wholly owned subsidiary of Compass registered in Australia under the Corporations Act 2001 (Cwlth) and as a charity with the Australian Charities and Not-for-Profits Commission (ACNC) .
Executive Manager	Many positions within Compass include the title “Executive Manager”. Regardless of whether an Executive Manager heads a Business Unit, the delegated authority of each Executive Manager depends on the functions and reporting relationship of the Business Unit for which the Executive Manager is responsible. Executive Managers should refer to the document Compass Organisational Chart in Terms of Levels of Delegated Authority for confirmation of the band of authority they hold.
Subsidiary Company	A company in which Compass owns all or at least most of the shares.
Worker (Compass Group)	a person engaged to carry out activities in any capacity for a company in the Compass Group, including work as: <ul style="list-style-type: none"> • an Employee, or • an independent contractor or subcontractor, or • a worker of a contractor or subcontractor, or • a worker of a labour hire company who has been assigned to work in the person’s business or undertaking, or • an outworker, or • an apprentice or trainee, or • a student gaining work experience, or a volunteer

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