



# Competition and Co-operative Housing

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*Response to Productivity Commission Report  
Introducing Competition and Informed User  
Choice into Human Services: Identifying  
Sectors for Reform, Preliminary Report,  
September 2016.*

The submission argues that competition theory can be misleading and misapplied, that User Choice should not be equated with Competition, users should include a choice to remain with public providers, that there is an overriding public interest test and that co-operatives should be recognised as an alternative to public and/or private and other community sector providers. The submission focusses on social housing and argues that co-operative housing is distinct, different and superior to other forms of community housing.

David Griffiths, Secretary, Co-operatives Victoria, October 2016

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## Context

The Productivity Commission identifies its key findings as follows:

Greater competition, contestability and informed user choice could improve outcomes in many, *but not all*, human services.

The Commission's preliminary finding is that there are six priority areas where introducing greater competition, contestability and informed user choice could improve outcomes for people who use human services, and the community as a whole.

- The Commission's view is that reform could offer the greatest improvements in outcomes for people who use social housing, public hospitals, specialist palliative care, public dental services, services in remote Indigenous communities, and grant-based family and community services.
- Well-designed reform, underpinned by strong government stewardship, could improve the quality of services, increase access to services, and help people have a greater say over the services they use and who provides them.
- The purpose of this report is to seek participant feedback on the Commission's findings before the public release of its study report in November 2016.

Introducing greater competition, contestability and informed user choice can improve the effectiveness of human services.

- Informed user choice puts users at the heart of service delivery and recognises that, in general, the service user is best-placed to make decisions about the services that meet their needs and preferences.
- Competition between service providers can drive innovation and create incentives for providers to be more responsive to the needs and preferences of users. Creating contestable arrangements amongst providers can achieve many of the benefits of effective competition.
- For some services, and in some settings, direct government provision of services will be the best way to improve the wellbeing of individuals and families.
- Access to high-quality human services, such as health and education, underpins economic and social participation.
- The enhanced equity and social cohesion this delivers improves community welfare.

Government stewardship is critical. This includes ensuring human services meet standards of quality, suitability and accessibility, giving people the support they need to make choices, ensuring that appropriate consumer safeguards are in place, and encouraging and adopting ongoing improvements to service provision.

High quality data are central to improving the effectiveness of human services.

- User-oriented information allows people to make choices about the services they want.

- Data improves the transparency of service provision, making it easier for users to access the services they need, and increases accountability to those who fund the services.
- Governments are better able to identify community needs and expectations, and make funding and policy decisions that are more likely to achieve intended outcomes.

What underpins these arguments for competition, contestability and user choice is privatisation – the assumption that transferring the ownership and control of human services from the public sector to the private sector is desirable and serves the public interest. Since the 1990's throughout Australia this assumption has driven the sale of government assets – including electricity and gas, banks, airports, ports, vocational education, Medibank and Telstra. Privatisation has not only involved the sale of these government enterprises but has also included the outsourcing of government services.

The Chairman of the A.C.C.C., Rod Sims, has questioned whether privatisation has damaged the economy by creating private monopolies and has suggested that the focus of the privatisation of government enterprises has been to maximise the sale price for government. These concerns are not, however, evident to the Productivity Commission whose key findings are encapsulated in this statement: “Introducing greater competition, contestability and informed user choice can improve the effectiveness of human services. “ The statement is implicitly self-evident and self-validating but is not, in fact, based on any documented evidence and/or validation. The words themselves are contentious – an improvement is generally understood to be an advanced change in a condition or a situation but this depends on agreement as to what constitutes an improvement as there are competing and different underpinning values and assumptions. Otherwise, the Productivity Commission is assuming that competition and contestability are in themselves virtues irrespective of consequences.

The Productivity Commission Report argues: Informed user choice places users at the heart of human services delivery. With some exceptions, the user of the service is best-placed to make choices about the services that match their needs and preferences. Putting this power into their hands lets individuals exercise greater control over their own lives and can generate incentives for service providers to be more responsive to users' needs. Competition between multiple service providers for the custom of users can drive innovation and efficiencies. Competition and user choice are already common across a range of human services including general practitioners (GPs) and private dental services, and childcare centres. More competition and user choice is being introduced in other human services, such as disability services. (p 7)

It is disappointing, however, that the Productivity Commission does not recognise that users could also have a choice about the ownership of services which could include user ownership of services. In Victoria the Westgate Health Co-operative Ltd and in the ACT the National Health Co-operative are GP models of service delivery owned and controlled by their user members. There is a considerable difference in power between users being able to choose between providers and user ownership and control of their own services.

There are social service co-operatives in Canada, France, Spain, Portugal, Finland, Poland, Greece, Hungary, Japan and the UK. In Quebec, Canada, there are 100 social service co-operatives – 40% providing home care services. In Japan the social service co-operative include 81 hospitals, 352 health centres, 55 dental clinics, 225 home care nursing services, 375 home care personal services and 297 day care centres. In Italy social service co-operatives are the main providers of welfare services. In 2008 there were 140,000 social service co-operatives with 350,000 workers, 5 million users and were generating an income of 10 billion euro.

Co-operatives provide the opportunity for users to own and control services instead of being a recipient of services. The following table briefly summarises the difference between a co-operative and a company:

Characteristics	Co-operative	Company
Aims and Objectives	The achievement of social objectives through democracy and the creation of a surplus.	The achievement of business objectives and increased dividends for shareholders.
Ethical Values and Principles	Inherent and embedded based on the co-operative values and principles.	Dependent on and enforced by Government legislation and regulation.
Voting	One vote per member irrespective of the number of shares	Number of shares determines the number of votes
Share limits	Limit of up to 20% or less on proportion of shares held by members	No limit on proportion of shares held by individuals/organisations
Membership	Open to individuals and/or organisations	Individuals and institutions
Control	Majority of members through general meetings and election of directors	Majority of shares with disproportionate control. Control will vary depending on who owns how many shares at any given point of time.
Shares	Co-operatives may or may not have shares. If shares, Allocated by board and not publicly traded	Publicly traded and sold
Share Value	Co-operatives may or may not have shares. If shares, Constant	Different values and classes

	value one class of share	with different rights
Profit Distribution	Limited interest. Distribution determined by Rules and AGM. Distribution usually in proportion to labour contribution and/or trading	No limited interest. Distribution by board of directors. Distribution usually in proportion to shareholding.

It could be assumed that non-profit welfare agencies are similar to co-operatives but this claim ignores four fundamental differences. In recent years the welfare agencies have become increasingly dependent on corporations and Government funding. Welfare agencies have also become involved in the development of social enterprises which perpetuate the charity and benevolence model of the parent agencies – enterprises that are owned and controlled by the agencies for their clients – rather than by clients.

<b>Characteristic</b>	<b>Co-operatives</b>	<b>Welfare Agencies</b>
Purpose	Self-help and self-empowerment by members.	Charity and benevolence by members for clients.
Ethical Values and Principles	ICA Co-operative values and principles.	Welfare agencies values and principles.
Democracy	Member ownership and control	Benevolent ownership and control
Autonomy and Independence	Self-funding	Dependant on corporation, charitable and Government funding.

The Productivity Commission's assessment of the services presented in table 1 takes into account evidence from a range of sources including contributions from participants, overseas experience, research undertaken by others and Commission analysis. Case studies from Australia and overseas have been used to inform the assessment of suitability for reform.

In identifying services, the Commission had regard to a number of factors, including:

- the extent to which services are already subject to competition, contestability or user choice (examples here include the provision of GP services)
- whether reforms to introduce greater competition, contestability or user choice are proposed, or are underway (examples here include disability services, mental health services and vocational education and training)

whether improved outcomes could be better delivered by reforms other than greater competition, contestability or user choice (examples here include school education).

For a number of the services considered by the Commission, competition, contestability or user choice reform could improve service provision for users, and benefit the community as a whole. The services identified reflect the Commission's preliminary view of where well-designed reform could offer the greatest improvements in community wellbeing. The assessment has identified six priority areas:

social housing

public hospital services (p 11)

specialist palliative care

public dental services

human services in remote Indigenous communities

grant-based family and community services. ( p 12)



In discussing housing, the Productivity Commission notes: “Shelter is a basic human need. Housing assistance provides a safety net for those that are experiencing homelessness, or who face high barriers to sustaining a tenancy in the private rental market, and plays an important role in increasing their quality of life. About 400 000 households live in social housing. Recipients of social housing support, who are also likely to access a number of other human services, have reported through the National Social Housing Survey that they are in better health, are better able to improve their employment situation and have better access to the services and supports they need once settled in stable accommodation. (p 14)

The current social housing system limits the ability of tenants to choose the home they would like to live in. Once applicants reach the top of the social housing waiting list, they are generally allocated an available home based on their preference for the area in which they



would like to be housed and their broad characteristics. The suitability of an allocated property can be a question of timing and luck. Tenants cannot ‘hold out’ for a preferred property, because those that reject two (or sometimes one) offers of housing are relegated to the back of an already long waiting list, and often must take what is offered.

Many people who enter social housing are likely to be capable of exercising choice over their housing options — although some may need additional support to be able to exercise informed choice and maintain a tenancy. Efforts to improve users’ choice of home have led to a range of benefits overseas. Tenants are more likely to stay in the same area, invest in the local community, and have stable accommodation. Data collected from choice-based systems has been used to identify the housing characteristics that tenants prefer, and to target areas of high demand and need.

Under the current social housing system, demand for social housing far outstrips supply, limiting the properties available for prospective tenants to choose from. Approaches have been implemented overseas that provide a choice of home, even where there are supply constraints. Reform options could also be explored in Australia to address supply constraints and increase the housing options available for prospective social housing tenants. (p 16)

The Productivity Commission concludes its discussion of housing with the following:

#### PRELIMINARY FINDING 3.1

Introducing greater competition, contestability and user choice could improve the effectiveness of the social housing system in meeting tenant needs.

There is substantial room for improvement in the current social housing system. There are long waiting lists, poorly maintained and underutilised properties, and a lack of information available to allow governments to select and monitor the performance of service providers.

Four out of five social housing properties are managed by government entities, yet there are a large number of housing providers — both not-for-profit and for-profit — that could perform this service. Community housing providers outperform public providers on some indicators, including tenant satisfaction and property maintenance. (p 15)

The Productivity Commission report fails to differentiate between the management and performance between public housing and community housing – instead generalising that due to funding pressures and demographic changes, the quality of the service received by social housing tenants has deteriorated. Once housed, the quality of the home received by the tenant can be poor: housing authorities have often taken a short-term view and deferred preventative maintenance, and about 20 per cent of properties are now not in an acceptable condition (figure 3.2; NT DTF sub. 261; VAGO 2012). Additional maintenance expenditure as part of the Australian Government’s 2008 stimulus package has not alleviated deteriorating quality standards in public housing. (p 66) The Victorian Auditor-General’s Office (2012) has noted that the Victorian housing authority lacked basic information to inform decision making. Similar issues have been noted in New South Wales (AONSW 2015a). Better data collection, and better use of existing data, could help address these concerns.



These generalisations are an indictment of the rigorousness of the Productivity Commission as there are significant differences between public housing and community housing management and performance.

From 1 January 2005, the [Housing Act 1983](#) in Victoria was amended, introducing a new system of regulation for non-government rental housing agencies. The legislation established the Registrar of Housing Agencies and an accompanying range of functions, subsequently supported by its administrative arm, the Housing Registrar. As at 30 June 2015, there were 43 registered agencies consisting of eight [housing associations](#) and 35 [housing providers](#). A regulatory framework has been developed in consultation with currently registered housing agencies, agencies seeking registration, and peak bodies. The key aims of the regulation of community housing in Victoria are to:

- ensure each registered agency is well governed, well managed and financially viable
- protect and ensure accountable use of government assets managed by the affordable housing sector
- build confidence in the public and private sector to invest in and grow affordable rental housing
- ensure quality and continuous improvement in service delivery and outcomes for tenants

The gazetted [Performance Standards](#) form the core of the regulatory framework and are the key source to monitor compliance with regulatory objectives. These in turn are underpinned by [Evidence guidelines](#) that set out the performance requirements, indicators and evidence sources used to demonstrate compliance against Performance Standards. Management and operational performance are assessed against seven Performance Standards – agencies report on results against key performance measures (KPMs) and copies of relevant documents are provided by agencies.

It is puzzling, therefore, why the Productivity Commission chose to not recognise the rigorous management and performance accountability and transparency of community housing – compared with public housing.

## **Co-operative Housing**

Co-operative housing is a unique form of housing that is substantially different from private housing, public housing and other forms of community housing and its development and practice is guided by the following values and principles adopted by the International Co-operative Alliance.

### **Co-operative identity, values & principles**

#### **Definition**

A co-operative is an autonomous association of persons united voluntarily to meet their common economic, social, and cultural needs and aspirations through a jointly-owned and democratically-controlled enterprise.

## **Values**

Co-operatives are based on the values of **self-help**, **self-responsibility**, **democracy**, **equality**, **equity** and **solidarity**. In the tradition of their founders, co-operative members believe in the ethical values of honesty, openness, social responsibility and caring for others.

## **Principles**

The co-operative principles are guidelines by which co-operatives put their values into practice.

### **1. Voluntary and Open Membership**

Co-operatives are voluntary organisations, open to all persons able to use their services and willing to accept the responsibilities of membership, without gender, social, racial, political or religious discrimination.

### **2. Democratic Member Control**

Co-operatives are democratic organisations controlled by their members, who actively participate in setting their policies and making decisions. Men and women serving as elected representatives are accountable to the membership. In primary co-operatives members have equal voting rights (one member, one vote) and co-operatives at other levels are also organised in a democratic manner.

### **3. Member Economic Participation**

Members contribute equitably to, and democratically control, the capital of their co-operative. At least part of that capital is usually the common property of the co-operative. Members usually receive limited compensation, if any, on capital subscribed as a condition of membership. Members allocate surpluses for any or all of the following purposes: developing their co-operative, possibly by setting up reserves, part of which at least would be indivisible; benefiting members in proportion to their transactions with the co-operative; and supporting other activities approved by the membership.

### **4. Autonomy and Independence**

Co-operatives are autonomous, self-help organisations controlled by their members. If they enter into agreements with other organisations, including governments, or raise capital from external sources, they do so on terms that ensure democratic control by their members and maintain their co-operative autonomy.

### **5. Education, Training and Information**

Co-operatives provide education and training for their members, elected representatives, managers, and employees so they can contribute effectively to the development of their co-operatives. They inform the general public - particularly young people and opinion leaders - about the nature and benefits of co-operation.

### **6. Co-operation among Co-operatives**

Co-operatives serve their members most effectively and strengthen the co-operative movement by working together through local, national, regional and international structures.

## **7. Concern for Community**

Co-operatives work for the sustainable development of their communities through policies approved by their members.

In metropolitan and rural areas across Victoria, rental housing co-operatives currently provide affordable housing to over 6000 people, including 2240 children, across 2500 properties. There are over 210,000 housing co-operatives around the globe, with over 18 million properties and some 27 million members. Today, co-operative housing accounts for between 10 and 15% of housing in Sweden, Norway and Germany, and it is a growing housing sector in Canada, the USA and United Kingdom.

Housing co-operatives are part of a worldwide co-operative movement which includes the following:

Over 1 billion people worldwide are members of co-operatives.

Over 3 billion people worldwide secure their livelihoods through co-operatives.

Co-operatives employ more than 20% more people than multinational corporations.

### **Co-operative Housing Success**

The role and potential of rental housing co-operative is ignored by the Productivity Commission. While small, the SouthEast Housing Co-operative Ltd. SouthEast is a profitable co-operative with a long-serving professional staff and a commitment to improving services to members. Recently, for example, the co-operative has introduced a smoke alarm inspection service, a new after hours maintenance service and a heating and cooling policy. For the year ended 30 June 2015 the co-operative's revenue was \$1,743, 584 – a surplus of \$365,305. Equity at 30 June 2015 was \$4,444,266 – an increase from \$4,078, 960 at the 30 June 2014.

The Business Council of Co-operatives and Mutuals (BCCM) is the national peak body representing the co-operative and mutual models of enterprise. Formed in 2013, the BCCM is led by the chief executives of Australia's co-operative and mutual businesses.

The BCCM has advocated the development of public service mutuals in Australia and on 4 September 2014, the BCCM launched the White Paper entitled, *Public Service Mutuals: A Third Way for Delivering Public Services in Australia*. The White Paper illustrates and examines the context for delivering public services in Australia which needs radical reform and requires immediate attention to address the emerging challenges. As part of this reform, the White Paper calls for the recognition and realisation of a third way of delivering public services based on an expanding role for co-operative and mutual member based businesses. This includes the opportunity to explore the potential for staff run mutuals.

The United Kingdom's public service mutual program, begun by the coalition government in 2010. The Community and Public Sector Union in Australia has pointed out that a lot of

newer PSMs created in the UK are not actually mutuals, but in fact “mutual joint ventures” without majority employee ownership. The BCCM actually shares the union’s worries about the UK government’s model for “public service mutuals” that aren’t really mutuals and according to chief executive Melina Morrison “We would agree with a lot of what the CPSU is saying,” Morrison told *The Mandarin*. “There can be ideological capture, where what is actually occurring is not a mutualisation, it’s a privatisation. And that causes a lot of brand damage for the co-operatives and mutuals sector, as it has in the UK. There should always be majority ownership by the employees for it to be called a mutual. They have to have meaningful ownership and control, and it has to be majority ownership.”

Stephen Easton Why the UK’s public service mutuals must be viewed with caution *The Mandarin* 23/9/2015

The BCCM has also addressed the nature and scope of co-operative housing and in *Rewriting the Australian Dream – Co-operative Housing’s Role in delivering an effective housing system* (March 2016) has argued:

Due to the origin of co-operative housing in Australia as well as the strong links to social housing delivery, co-operative housing is often positioned as part of the community housing sector. It both contributes to the community housing offer -comprising approximately 5% of the community housing sector nationally- but also offers points of difference that deliver many benefits to individuals, households, communities and governments. Co-operatives, like community housing organisations (CHOs), offer many benefits such as the ability to attract private finance to redevelop public housing stock, to enable stock growth and to integrate shared and full equity models. However, co-operative housing offers comparative benefits for delivering affordable housing unmatched by other models because it empowers people, reduces welfare dependency and maximises return on government investment. In markets where it has been supported through government policy, it can be market leading, such as in Victoria where CEHL has the largest stock of social housing of all Victorian Community Housing Organisations. Given the potential of co-operative housing to provide a system-wide response to the affordable housing challenge, as well as rapidly growing demand for innovative housing and tenure models -evidenced for example by growing demand for retirement villages with shared equity models as well as deliberative development and co-housing projects in major cities- it is pertinent to consider the possible role and comparative advantages of co-operative housing. In essence, co-operative housing is distinct to community housing and the private sector because of the collective ownership structure, the in-built opportunity for residents to influence housing outcomes, as well as embedded opportunities for individual growth through capacity building. It provides a pathway to amplify the return on investment to the taxpayer. ( p.18)

It is crucial to acknowledge that co-operative housing is different and distinct from other forms of community housing and, therefore, it would be useful to clearly identify these differences:

Characteristic	Housing Co-operatives	Welfare Community Housing
Purpose	Self-help by tenant members.	Charity and benevolence by members for clients i.e.

		housing tenants. Maintains welfare dependency.
Ethical Values and Principles	International Co-operative Alliance Co-operative values and principles.	Welfare agencies values and principles.
Democracy	Member ownership and control	Benevolent ownership and control
Governance	Board elected from and by housing co-operative members.	Board appointed by parent body or non-tenant members which may or may not include token tenant members.
Autonomy and Independence	Self-funding	Dependant on corporation, charitable and Government funding.

The specific benefits of co-operative housing compared with public and other forms of community housing are:

### **Ownership Benefit**

The psychological (and social) benefits of the sense of ownership are interconnected with actual ownership and relate strongly to the cultural and social power of the idea of home-ownership as embodied by the ‘Australian Dream’.

### **Diversity Benefit**

There is a need to increase the *diversity of housing*. Cooperative Housing offers models of housing tenure which responds to other life aspirations (social, personal and ecological) and the changing (inter-)generational dynamics of the globalising and re-localising world; based on member tenant ownership and/or control.

### **Security Benefit**

The tenants of a co-operative are also the member owners. In co-operative housing this creates a unique sense of security.

### **Control Benefit**

Cooperative control is embedded in the purpose, philosophy and structure of housing co-operatives. Co-operatives ownership, therefore, strengthens a sense of place because the tenants are member-owners.

### **Community Benefit**

Community development is unique to co-operatives that involve the essential basis for member control - education and training of members, democratic functioning, effective meetings and good communications. Community

development in a co-operative aims to empower the members of a co-operative to influence the goals and decisions of the co-operative.

In its Disability Care and Support Report (2011 Vol 1 pp 355 -357) the Productivity Commission argued for expanding user choice – moving away from decisions about which human services would be delivered, in what quantities and to whom. In commenting on this, the Competition Policy Review Final Report (March 2015 p. 230) argued that providing users with a direct budget may allow them to effectively exercise choice. The logic of this is that tenants should have a direct budget which enables them to choose between public providers, co-operative providers, other community housing providers and private providers.

In Productivity Commission stance could hold potential for social housing gains (27 September 2016) Hal Pawson has argued that community housing providers might legitimately position themselves as the reform alternative to privatisation.

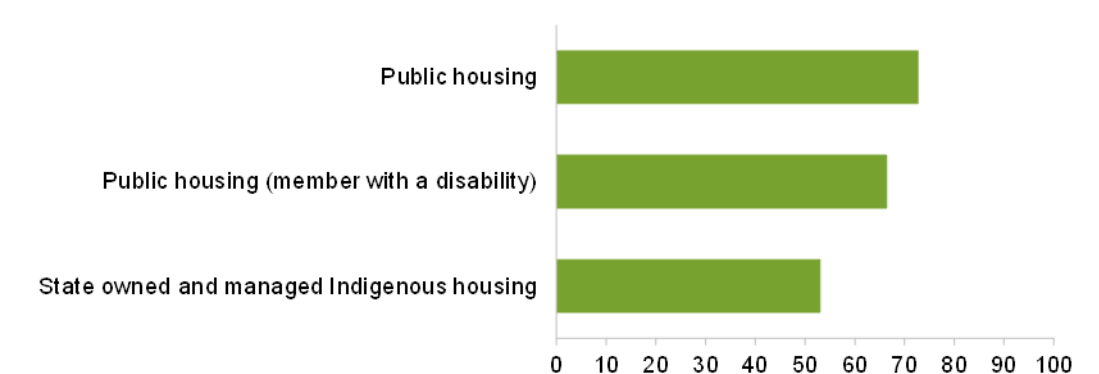
‘This is a contestable generalisation as many community housing providers share the same profit goal as private providers and are compromised by an unthinking embracement of corporate structures and processes and it is not unexpected that this criticised as a form of privatisation. Co-operative housing is the only real reform alternative to privatisation – not other forms of community housing.

The Productivity Commission includes a table on tenant satisfaction with public housing but does not compare this with satisfaction with community housing.

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**Figure 3.3 Tenant satisfaction**

*Per cent of tenants satisfied or very satisfied with their housing*



Source: SCRGSP (2016a).

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## Co-operative Housing Satisfaction

The SouthEast Housing Co-operative has demonstrated the superior performance of a co-operative in satisfying its member tenants. In 2014-2015 82.6% of members were Very Satisfied or Fairly Satisfied with Maintenance Services. This is a slight fall from 84.88% in 2012-2013 but still remains above the tenant satisfaction levels reported by the Australian Institute of Health and Welfare. SouthEast achieved 69% in 2010-11, 81.8% in 2011-2012 and similar agencies 83.5% in 2011-12. For 2012-13 on maintenance services 73 members

(84.88%) were either Very Satisfied or Fairly Satisfied. The Australian Institute of Health and Welfare has just released the National Social Housing Survey: Summary of National Results. The level of satisfaction with maintenance was (a) day-to-day maintenance - public housing 71% and community housing 76% and (b) emergency maintenance - public housing 77% and community housing 79%. The survey was mailed to a random sample which included 55,101 public housing and 17,570 community housing households. The response rate was 16% for public housing and 17% for community housing.

2014-2015 survey of members reported 93.33% were very satisfied or fairly satisfied with tenancy services. In 2010-11 SouthEast achieved 79.3% and in 2011-12 89.4% with similar agencies achieving 90% in 2011-12. In 2012-13 90.80% (79) were either Very satisfied or Fairly Satisfied with Housing Services. No figures are available for 2013-2014. The Australian Institute of Health and Welfare reports that tenant satisfaction with services provided by housing organisations was (a) indigenous - public housing 56% and community housing 67% (b) non-indigenous - public housing 65% and community housing 74%. Satisfaction of 65% for public housing was down from 73% in 2010. Satisfaction of 74% for community housing was down from 79% in 2010

## **Public Housing Transfers**

The Productivity Commission proposes: Transferring the management of more properties to non-government providers could deliver more options for tenants who are offered a choice of housing provider. Where further transfers are considered, making the management of housing contestable would allow governments to select those providers best-placed to improve the management of social housing properties, and give incentives for providers to be responsive to tenant needs. Such a process would not preclude the management of properties remaining with the public provider, if they were best-placed to provide the service. (p 74)

Economies of scale in tenancy management would need to be taken into account in any reforms to increase user choice and contestability to avoid a potential increase in the costs of tenancy management. Pawson et al. (2015) found that community housing providers are likely to have higher unit costs than the existing public providers, due in large part to the larger scale of public providers. The NT DTF (sub. 261) noted that community housing providers should be managing about 500 properties to achieve adequate scale. (p 74)

This recommendation, however, ignores the reality of housing co-operatives whether it is independent co-operatives within a Common Equity Housing Model or stand alone as with the SouthEast Housing Co-operative Ltd. It implies that the SouthEast Housing Co-operative Ltd should not be eligible for transfers because of its size yet the co-operative is well-managed, generates a surplus and is user owned and controlled – demonstrating a viable model for tenants. User choice is not about economies of scale and SouthEast has demonstrated it is possible to be a small co-operative and not increase the costs of tenancy management.



In Productivity Commission stance could hold potential for social housing gains (27 September 2016) Hal Pawson has argued for large-scale transfers of public housing. Public housing transfers should be of two kinds – large-scale and small-scale. If transfers are only large-scale, then, this will automatically exclude small providers. Pawson's assumption, however, should not surprise as he fails to understand the significant differences between co-operative and other community housing providers.

## **Conclusion**

Co-operatives are an existing viable alternative to delivering social housing – an alternative to public and private housing and the corporate and/or benevolence model of other community housing providers.

The Productivity Commission indulges in loose rhetoric about the desirability of competition, contestability and user choice without exploring different models of service delivery, including co-operatives, and without admitting a privatisation agenda. The assumption of the Productivity Commission is that alternatives to public service delivery of services will produce automatic benefits.

A co-operative alternative has to compete with other models for the delivery of social housing and demonstrate a clear financial plan, the potential to improve services, flexibility and performance measures. These in themselves are not sufficient for co-operative social housing also requires the tenants choosing a housing co-operative. It is a real choice not available from private and public housing and the corporate and/or benevolence model of other community housing providers.

Any public housing transfers, however, should be based on user choice - including tenants having the right to stay with public housing. The choice, however, should not be based on the superior quality and service of community housing but should also be based on a commitment and funds to improve the quality and services within public housing.

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**He was Chairman (1997-2001) and Secretary, Co-operatives Victoria (2001- ) - including establishing and developing [australia.coop](http://australia.coop) and [victoria.coop](http://victoria.coop) web sites – and Chairman (2011) and Secretary (2008 – 2013), Co-operatives Australia He was a member of the Ministerial Advisory Committee on Co-operation (1982-1985) and Co-ordinator, Co-operative Development Program, Ministry of Employment and Training (1982-1985) He is a Lifetime Member, National Co-operative Business Association (USA)**