

GUIDANCE NOTE

Self-assessment of performance against business plans and Performance Standards

This document provides guidance to registered agencies on self-assessments against business plans and Performance Standards when reporting to the Registrar of Housing Agencies (the Registrar) as part of the Annual Compliance Assessment (ACA) process.

The information is consistent with compliance requirements under the *Housing Act 1983* (Vic) (Housing Act), gazetted Performance Standards and Evidence Guidelines.

Purpose

This guidance supports registered agencies to complete self-assessments. It describes the purpose and value of registered agency's undertaking self-assessments and the Housing Registrar's approach to reviewing self-assessments as part of the ACA.

Compliance with Performance Standards and regulatory reporting requirements

The Performance Standards are established under section 93 of the Housing Act (and gazetted) and contain the fundamental compliance requirements expected of all registered agencies.

The primary purpose of self-assessment reporting is to provide evidence to the Registrar that the registered agency is meeting Performance Standards. Self-assessments are a key source of evidence in the Registrar's ACA for each registered agency.

Self-assessments should demonstrate a registered agency's internal assessment of the organisation's:

- compliance with Performance Standards; and
- continuous improvement over the relevant performance year under assessment.

There are two tranches of self-assessments submitted by registered agencies to the Housing Registrar as part of the ACA, which consist of self-assessments against:

- the business plan due for submission by 31 August each year; and
- Performance Standards due for submission within 28 days following a registered agency's Annual General Meeting (AGM).

Registered agencies are required to submit these self-assessments through the Housing Registrar's online Community Housing Information Management and Engagement System (CHIMES).

The value of self-assessment to your agency

Self-assessment is an effective and valuable tool that underpins good governance and demonstrates to the Registrar that registered agencies have systems in place to ensure they are legislatively compliant, self-assessing their performance, monitoring progress (including against compliance issues) and have a culture of continuous improvement. Self-assessment is a useful source of evidence for ACAs for each performance year.

Self-assessment provides a valuable opportunity for boards and committees of registered agencies to:

- have oversight over the organisation's assessments of its compliance status against Performance Standards, including any compliance issues requiring resolution; and
- monitor progress against regulatory plan action items in the regulatory plan.

Self-assessment process

The Registrar recognises that the community housing sector comprises a number of registered agencies that vary significantly in size, growth profile and service delivery focus. The self-assessments submitted by each registered agency are assessed by regulatory analysts using a risk-based approach. For each registered agency, the Housing Registrar uses the Regulatory Engagement Tool (RET) to make an assessment using financial and non-financial indicators, of the regulatory risk of that organisation (rated as either very high, high, moderate or low). This risk assessment is used to determine the level of regulatory engagement necessary proportionate to the regulatory risk that the organisation presents. Generally, this means the Housing Registrar spends more time engaging with registered agencies assessed as having a higher risk profile, which are predominately categorised as housing associations. The engagement profile for a registered agency is stated in its annual compliance assessment.

As a minimum requirement for self-assessment reporting, registered agencies are required to provide evidence consistent with the following agency classifications:

- housing providers identified in the 'HP2' level of regulation should supply one evidence item per Performance Standard;
- housing providers identified in the 'HP1' level of regulation should supply at least two evidence items per Performance Standard;
- housing associations are expected to report more comprehensively against each of the Performance Standards.

As a registered agency you may have identified a body of evidence that supports compliance with Performance Standards as a baseline requirement. However, self-assessment reporting is also required to demonstrate improvements against Performance Standards that your agency has made over the past performance year. Performance Standard indicators, ideally contained in your agency's annual business plan, are a principal mechanism for demonstrating year-on-year achievements and improvements.

The Registrar encourages registered agencies to embed continuous self-assessment and improvement practices within established governance processes and to progressively perform self-assessment throughout the performance year.

When completing self-assessments, a registered agency is expected to:

- present clear evidence that the governing body provides effective control and supports the outcomes of its business;
- demonstrate a clear understanding of regulatory requirements under the Housing Act, Performance Standards and Evidence Guidelines;
- use performance indicators to summarise the outcomes against Performance Standards;
- provide evidence of compliance in self-assessments that comply with the requirements of the Evidence Guidelines;
- identify areas of risk and present evidence of progress and/ or planned actions to mitigate risks;
- where there are areas of non-compliance or underperformance, identify these areas and describe any actions to remedy that non-compliance or underperformance;
- demonstrate continuous improvements over the relevant performance year under assessment;
- address any compliance issues requiring resolution (e.g. regulatory plan action items in the regulatory plan, interventions under the Housing Act); and
- submit the self-assessments by the required regulatory reporting deadlines consistent with requirements under the Housing Act

Should registered agency's encounter difficulties in meeting self-assessment and other reporting timelines, they must notify the Housing Registrar within a reasonable timeframe in advance of reporting deadlines. Selfassessments received after regulatory reporting deadlines, with no prior notice or explanation, will be considered to breach legislative reporting requirements.

Recommended approach for completing a self-assessment against the business plan

When completing the self-assessment on achievements against business plan outcomes and objectives/activities (including key performance measures/targets) registered agencies should address each individual objective documented in the annual business plan.

Registered agency commentary on individual objectives should include:

- (a) an assessment of the objective's completion or progress as at the end of the annual compliance assessment period (i.e. against the original or anticipated start/completion date), e.g.:
 - (i) completed/met
 - (ii) commenced/partly met
 - (iii) delayed/postponed/not met
 - (iv) rephased future work/not commenced.
- (b) Additional relevant information:
 - (i) major achievements/improvements/progress made
 - (ii) risks/matters impacting on an objective not being met.

Recommended approach for completing self-assessment against Performance Standards

When completing the self-assessment against Performance Standards, agencies should be guided by the performance indicators associated with each Performance Standard.

The evidence guidelines also list the minimum documentation required as evidence to substantiate assessments, which is reviewed as part of the ACA. Registered agencies must provide sufficient evidence to demonstrate compliance with Performance Standards. The documentation listed in the evidence guidelines is not exhaustive and agencies may use additional business documentation to demonstrate compliance. If requested, a registered agency must provide supporting evidence to satisfy the Registrar that Performance Standards have been met.

A framework to support registered agencies in completing the self-assessment against Performance Standards is provided below. **Commentary notes** provide a prompt for illustration purposes and should not be included in a registered agency's self-assessment. A fictitious housing provider called Better Living Plus Ltd (BLP) is used as a reporting example.

Step 1. Identify the achievements and continuous improvements against the business plan and indicator(s) for each Performance Standard that your registered agency will provide evidence against, i.e. your registered agency has supporting evidence to show these performance indicators have been met during the past performance year;

BLP has decided to provide evidence against Promotion of community housing to demonstrate compliance with Performance Standard 3. Community Engagement, as BLP conducted several activities during the past performance year engaging with its tenants and partner community agencies to promote community housing.

Step 2. Collect supporting evidence in reference to the Evidence guidelines which sets out evidentiary requirements;

BLP looked at the Promotion of community housing indicator under Performance Standard 3. Community Engagement in the Evidence guidelines and found that the following information/ examples could be used to demonstrate BLP's compliance of this indicator:

Requested information

- Up to date copies of community engagement policies and procedures
- Community engagement strategy or similar document that details how the agency works with other organisations to promote community housing

May be requested

- Newsletters/surveys and other marketing information
- Partnership arrangements with support agencies and other service providers.

Since BLP's community engagement policies and procedures are up-to-date and the next review date is next year, BLP has decided to provide information/ examples on its community engagement strategies and marketing information to demonstrate compliance with Performance Standard 3. Community Engagement.

Step 3. Complete the Self-assessment against Performance Standards template in CHiMES and clearly present the supporting evidence (collected based on the Evidence guidelines from Step 2) to meet each Performance Standard. This should include identifying which performance indicator(s) are being addressed and what achievements/continuous improvements have been made over the annual compliance cycle and provide evidence or indicate where the evidence source/ reference documents are located (if applicable) based on the Evidence Guidelines.

The below self-assessment report for BLP against Performance Standard 3. Community engagement follows the recommended reporting format.

Community engagement

Comment

(Summary of the Performance Standard)

The registered agency works in partnership with relevant organisations to promote community housing and to contribute to socially inclusive communities.

(The performance indicator with supporting examples/ information)

Promotion of community housing: The registered agency engages with relevant organisations using appropriate communication tools to promote community housing and benefits of partnership.

BLP's Board approved the revised Community Engagement Strategy on July 2019 (a copy of the Strategy was uploaded to the CHIMES document library on 30 July 2019).

Consistent with the refreshed Community Engagement Strategy and BLP's renewed focus on targeted engagement with key stakeholders, BLP has actively engaged with a range of organisations to promote community housing and the benefits of partnerships in this annual compliance cycle. Specifically, BLP has led or participated in:

- a research study with Deakin University on the benefits of community housing (a copy of the final research report 'The Benefits of Community Housing' was uploaded to the CHIMES document library on 1 September 2019);
- a reference group with the Department of Health and Human Services on social housing reform;
- the National Housing Conference held in August 2019 in Darwin;
- regular meetings with potential local support partners and community agencies to promote the agency's services and expand access to referral pathways for tenants. This compliance cycle BLP's Senior Manager formalised referral arrangements with new support partners including (City of Darling and Help for Homelessness) and renewed the partnership agreement with Mental Health Plus (MHP) to provide health and wellbeing services to tenants (a copy of the Service Level Agreement with MHP was uploaded to CHIMES document library on 30 July 2019);
- BLP was successful in their Community Grant Application with the City of Darling to support the provision of accredited training to tenants on a range of life skills topics of interest to tenants (such as nutrition and food preparation as well as how to write a resume and preparing for job interviews);
- quarterly resident forums feature presentations from external support providers including emergency services, Police and local Councils (e.g. on information about complex neighbour issues). Support from local partners has enhanced training and information sharing opportunities for tenants and promoted access to culturally diverse information. These Forums have also provided an opportunity for residents to also be more actively involved in the planning and delivery of their local housing and property services.

BLP also uses various communications tools to promote community housing including:

- its website, www.BLP-services.com.au (e.g. for a promotional campaign on being a good neighbour. This campaign also included the development of brochures in three different languages that are available on the website and were distributed by mail drop to all tenants; copies of the brochures were uploaded to the CHIMES document library on 10 November 2019);
- social media channels including Facebook and LinkedIn;
- an online bi-annual newsletter available to tenants and the general public (an example of the newsletter is attached to this 'Self-assessment on Performance against Performance Standards' report).

Other sources of information

Refer to the below webpage links for further information:

- [Housing Act](#)
- [Performance Standards](#)
- [Evidence guidelines.](#)