

# Operational Policy for Pre-placement Interview T-137

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## 1. Introduction

Management of the Social Housing Register (SHR) is managed by the Ministry of Social Development (MSD). MSD identifies an applicant's housing need, priority and housing requirements as part of their needs assessment, and is responsible for managing this application until such time they are housed. Housing New Zealand is responsible for matching applicants from the SHR to available vacant properties, managing tenants, and maintaining the stock of social houses.

The placement of applicants into Housing New Zealand properties is based on the information provided from MSD. The information includes but is not limited to location, bedrooms required and other property and neighbourhood characteristics. Placement decisions are based on the applicants' needs and the sustainability of the placement. Applicants with the highest priority from the social housing register are matched first, except in exceptional circumstances or where a business initiated transfer (BIT) takes priority.

Matching applicants to properties is done through Housing New Zealand's tenancy management system (Kotahi) which is integrated with MSD's client management system. Placement support specialists create matches and offers to prospective tenants using the information sent through by MSD. This can be supplemented by additional information gathered during the pre-placement interview process, if a pre-placement interview has taken place.

### 1.1 Purpose

The purpose of this operational policy is to develop clear and simple pre-placement interview guidelines and rationale for placement support specialists and other front line staff to:

- identify applicants that need a pre-placement interview in order to gather additional information to supplement that already provided by MSD
- use the additional information to make better informed placement decisions
- identify what support applicants may need to sustain their tenancies and put that support in place
- gain a better understanding of what health and safety risks applicants may present, and consider what mitigations can be put in place to minimise those risks.

### 1.2 Objectives

Introducing a pre-placement interview process supports Housing New Zealand strategic goals and strategic outcomes. Increasing our understanding of the needs and challenges faced by applicants on the MSD Social Housing Register will enable Housing New Zealand to:

- put applicants needs at the centre of our decision making process, improving the quality of placement decisions
- focus resources on those most in need of help to sustain their tenancies
- gather additional information on household members so that placement decisions take into account the interests of children within the household and other vulnerable household members
- develop a deeper understanding of different applicant groups
- put in place tailored strategies to support applicants future needs

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- ensure our placement service delivery model is fit for purpose
- enable our tenancy managers to monitor and track progress in improving the sustainability of tenancies
- engage more effectively and confidently with social support providers
- better manage the health, safety and security risks presented by some of our customers
- reduce the number of bypasses and vetoes occurring in the placement process.

## 1.3 Scope

### In scope

The scope of the operational policy was determined by the pre-placement interview pilot and includes the rationale for implementing pre-placement interviews, selection criteria for carrying-out interviews, desired outcomes and support mechanisms for sustaining tenancies, and health safety and security risk mitigation strategies.

Declining to house applicants that present with unacceptably high risk health and safety and security issues has been included in scope. However, it should be noted that the Complex Customers Operational Policy, on which section 4.5 Declining to House Outcome is based, has yet to formally be approved by Housing New Zealand. Therefore, this section is included as a placeholder subject to formal sign off of the Complex Customers Policy. The Complex Customers Operational Policy will be presented to the Policy leadership Group as part of the full placement Policy refresh.

### Out of scope

The following were considered out of scope: business initiated transfers (BIT) and other specialised applicant groups such as Child Sex Offenders (CSOs), refugees etc. How the pre-placement interview process will apply to specific applicant groups will be confirmed in a general placement policy review.

## 2. Strategic framework

The operational policy on pre-placement interviews has been developed using information collated from the pre-placement pilot trial and the strategic and legal framework in which Housing New Zealand operates.

### Pre-placement Interview Pilot findings

By gathering additional information, a clearer picture of the holistic needs and risks the applicant presented with could be established, which leads to better placement decision making.

### Housing New Zealand Strategic Plan 2017-2021

Our social housing role is to provide good quality homes to those in most need and support our customers to sustain their tenancies for the duration of their housing need by linking them to support agencies.

To be successful, we need to increase our understanding of our customers and put their needs at the centre of our decisions. Carrying-out pre-placement interviews enables us to gather the additional information we need to support applicants to sustain their tenancies.

A more efficient and effective placement process contributes to the Government's Better Public Services target of improving access to social housing, with a target of reducing the median number of days to house 'A' priority applicants from the social housing register by 20 per cent by 2021.

As part of our Organisational Strategy to be a reliably high-performing organisation, the health, safety and security of our staff needs to be woven into our every day routines and activities. Carrying-out pre-placement interviews identifies risks that may otherwise be missed, equipping our staff to better assess safety and security risks and make good judgement calls.

## Legislation

The following relevant legislation was referenced in the development of these placement guidelines.

- **The Housing Restructuring and Tenancy Matters Act (HRTMA) 1992** – describes specific powers and functions of Housing New Zealand, specifically in regards to the placement of an applicant from the MSD Social Housing Register into a vacant Housing New Zealand property.
- **Section 75 of the HRTMA** – confirms that Housing New Zealand may review a placement and can allocate a prospective tenant on the MSD social housing register to particular Housing New Zealand housing.
- **Section 76 of the HRTMA** – puts limits on the obligations of Housing New Zealand to MSD. Nothing in the HRTMA Act requires Housing New Zealand to provide any housing or particular housing to a tenant referred or allocated to Housing New Zealand by the agency (MSD).
- **Housing Corporation Act 1974 (HCA)** – section 3B requires Housing New Zealand to act in a business-like manner, and be an organisation that:
  - exhibits a sense of social responsibility by having regard to the interests of the community in which it operates
  - exhibits a sense of environmental responsibility by having regard to the environmental implications of its operations
  - operates with good financial oversight and stewardship, and efficiently and effectively manage its assets and liabilities and the Crown's investment.
- **Health and Safety at Work Act 2015 (HSWA)** – section 30 imposes a duty to manage risks requiring Housing New Zealand:
  - to eliminate risks to health and safety, so far as is reasonably practicable; and
  - if it is not reasonably practicable to eliminate risks to health and safety, to minimise those risks so far as is reasonably practicable.
- **Section 36 of the HSWA** – requires Housing New Zealand to ensure, as far as reasonably practicable, the health and safety of:
  - workers who work for Housing New Zealand, while the workers are at work in the undertaking
  - workers whose activities in carrying-out work are influenced or directed by

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Housing New Zealand, while the workers are carrying-out the work, including the provision and maintenance of a work environment that is without risks to health and safety.

- **Other relevant legislation**
  - Privacy Act 1993.
  - Human Rights Act 1993.
  - New Zealand Bill of Rights Act 1990.
  - Residential Tenancies Act 1986.

### 3. High level process



The high level process for pre-placement interviews consists of 3 stages

- Determine if additional information is required to supplement the information already provided to Housing New Zealand by MSD. This determination occurs after we have matched the applicant to a vacant property, and following discussion with the tenancy manager. We need to have confirmed with MSD that the applicant is still on the Social Housing Register and obtain the applicants' contact details from MSD (offer stage MSDR).
- Arrange and complete the pre-placement interview with the applicant(s) and their support person(s), if they have one, to identify if additional support is needed to sustain their tenancy, or if they may present a health, safety and security risk to staff and others.
- Implement outcomes by setting up a Housing Action Plan (HAP) and/or referring applicant to support providers and/or putting in place health, safety and security mitigations. If following the pre-placement interview we decide not to progress the offer, it will be withdrawn in Kotahi.

### 4. Policy

Housing New Zealand will carry-out pre-placement interviews if it is determined that additional information is required to ensure good placement decision making, there is the need to link the applicant to support providers to help sustain their tenancy, or there is the need to put in place risk mitigation strategies.

Housing New Zealand staff will behave with integrity, fairness, impartiality and empathy towards applicants and their support person(s) when conducting pre-placement interviews. Staff will perform their duties efficiently, professionally and conscientiously in accordance with the State Services Commission: Standards of Integrity and Conduct. Refer to Housing New Zealand H-109 Standards of Integrity and Conduct.

The pre-placement interview will take place prior to the offer being made to the applicant at the pre-match/match placement stage. This is to ensure the applicant is not put in a position of an unsustainable tenancy.

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Applicants selected for pre-placement interview will be informed of the reasons for the interview, how the information provided by them will be used, and their rights to see the information and make corrections if the information recorded by Housing New Zealand is incorrect.

Applicants may decline to participate in the pre-placement interview or decline to answer specific questions. Participation is not mandatory and the placement should continue based on the information provided by MSD. However, the applicant should be encouraged to participate as they are more likely to achieve a better housing outcome if we have adequate information concerning their support needs and potential risk profile.

Where it is identified the applicant requires support to sustain their tenancy, they must be invited to participate in a Housing Action Plan (HAP) that will be set up by the placement support specialist and implemented by the tenancy manager once the applicant is housed. The tenancy manager is responsible for referring the applicant to MSD or other social support providers identified in the HAP.

Applicants already receiving support, including those transitioning from MSD emergency and transitional housing, will be encouraged to continue receiving support, and the tenancy manager may intervene to ensure support providers are aware their clients have been rehoused to facilitate and ensure continued support remains in place (subject to the applicant having signed the Privacy Statement).

Where it is identified the applicant may pose a health, safety and security risk to staff or others, the placement support specialist will up date CRIP ratings, invite the applicant to participate in a HAP, and enter information gathered in the pre-placement interview into a HAP after the tenancy has started. The tenancy manager may refer the applicant to social support providers and will manage the tenancy through the HAP.

The placement support specialist is responsible for setting up a safe work plan (SWP) if required for the pre-placement interview and will alert the tenancy manager to the requirement for a (SWP) to be put in place for future interactions with the tenant.

Applicants will be made aware of their rights to make a complaint if dissatisfied with the pre-placement interview process or outcome. This includes seeking a review of any decisions to the Review Office/Housing New Zealand Internal Ombudsman.

Where an applicant has undergone a pre-placement interview, this will be noted under the person details section in Kotahi. The information contained in the pre-placement interview sheet will be recorded in a way that it is retrievable. Whether or not the applicant is housed, the information gathered will be scanned and saved in a pre-placement folder created for the purpose in objective. The name(s) of applicants will be searched prior to commencing a pre-placement interview to avoid duplicate pre-placement interviews.

## 5. Eligibility for pre-placement interview

Not all applicants on the MSD Social Housing Register will need a pre-placement interview. The majority of applicants can be adequately matched without the need for additional information.

Pre placement interviews will be undertaken by exception only, at the discretion of the placement support specialist and in conjunction with the tenancy manager, as required.

Interviews will not be undertaken where the decision to carry-out an interview could be viewed as being subjective, intuitive, judgemental, displaying personal bias, or influenced by a vested interest.

## Valid reasons for pre placement interview

Valid reasons for interview	Next action
<p>The MSD application notes any health and safety events they are aware of, or that the applicant has been trespassed.</p>	<ul style="list-style-type: none"> <li>• Check the assessment responses in Kotahi to confirm if the applicant has a CRIP rating for former tenancies. Confirm whether the CRIP assessment is current, or whether there may be new information available.</li> <li>• Check with MSD the reasons for the assessment of CRIP, and determine if the application notes are insufficient to provide understanding.</li> <li>• Confirm with MSD what risk mitigation strategies they have employed to manage the assessment and application procedures with the applicant.</li> <li>• The placement support specialist will confirm if an interview is required, with the support of the regional customer support manager.</li> </ul>
<p>The MSD application notes the applicant has a known history of serious criminal convictions for drug, alcohol, violence, arson, or other anti-social behavioural issues.</p>	<ul style="list-style-type: none"> <li>• Check with the regional customer support manager, and confirm the standard of evidence available.</li> <li>• The placement support specialist will confirm if an interview is required, or if a match can proceed with the support of the area manager and the regional customer support manager.</li> </ul>
<p>The MSD application notes the applicant has significant mental health issues as defined by MSD's own classification criteria, where the mental health status may impact upon Housing New Zealand staff safely meeting with the customer.</p>	<ul style="list-style-type: none"> <li>• Gather further information from the applicant during the pre-placement interview (this should be initially by phone if there is a perceived health and safety risk). Seeking further information from MSD directly would only likely occur in exceptional circumstances.</li> <li>• Confirm with the area manager and the regional customer support manager if an interview is required, and arrange an interview time with the senior/tenancy manager.</li> <li>• Where appropriate, the placement support specialist will initiate Household Action Plan (HAP) for the applicant, and a match may proceed. For details on HAPs refer to T-240 Household Action Plan guideline.</li> </ul>
<p>The MSD application notes the applicant has a consented third party who is supporting the applicant in 'wraparound' service provision (includes applicants transitioning from MSD emergency and transitional housing).</p>	<ul style="list-style-type: none"> <li>• Contact applicant and support person. Confirm the need to carry-out pre-placement interview, arrange interview time with senior/tenancy manager.</li> <li>• Where appropriate, the placement support will initiate HAP for the applicant and a match may</li> </ul>

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Valid reasons for interview	Next action
	<p>proceed. For details on HAPs refer to T-240 Household Action Plan guideline.</p>
<p>Where there have been at least three vetoes of a suitable property match by the senior/tenancy manager.</p>	<ul style="list-style-type: none"> <li>• Check the reasons for veto and review the application notes.</li> <li>• Discuss with the senior/tenancy manager the reasons for veto of applicant.</li> <li>• Confirm with the area manager and the regional customer support manager that an interview is required, and arrange an interview time with the senior/tenancy manager.</li> </ul>
<p>Where the tenant was suspended by Housing New Zealand for a period of one year (and the suspension has now elapsed).</p>	<ul style="list-style-type: none"> <li>• Check the assessment history in Kotahi.</li> <li>• Confirm reasons for historical suspension.</li> <li>• Confirm with the area manager and the senior/tenancy manager the suspension history, and review the demonstrated change in behaviour/circumstances table in the Suspension guidelines. This will assist with the discussion at the interview</li> <li>• Confirm with the area manager and the regional customer support manager that an interview is required, and arrange an interview time with the senior/tenancy manager.</li> </ul>
<p>Previous Housing New Zealand tenant with a history of ASB or serious debt issue (though not suspended).</p>	<ul style="list-style-type: none"> <li>• Check ASB/debt history in Kotahi.</li> <li>• Confirm with the area manager and the regional customer support manager if an interview is required, and arrange an interview time with the senior/tenancy manager.</li> <li>• Arrange re-payment plan if the applicant has former tenant debt. Discuss with the applicant changed behaviours/circumstances that mitigate repeat ASB/debt and initiate a HAP if required. The tenancy manager will link the tenant to support agencies as required.</li> </ul>

## 5.1 Responsibilities and actions

Description	Role Responsible
<p>Receives enquiries from applicants and connects the applicant with the placement support specialist.</p>	<p>Customer Support Advisor</p>
<p>The placement support specialist is</p>	<p>Placement Support Specialist</p>

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Description	Role Responsible
<p>responsible for identifying the valid reasons to interview, and they will arrange for an interview to be undertaken at the local area office or over the phone for applicants in geographically distant locations, or where there are health and safety issues. The placement support specialist may request the senior/tenancy manager to participate in the interview. The placement support specialist will:</p> <ul style="list-style-type: none"> <li>• gather information to inform the decision to undertake a pre-placement interview</li> <li>• contact the applicant and known support people to attend the interview with the applicant</li> <li>• discuss the possible outcomes of the pre-placement interview with the applicant as relevant</li> <li>• carry-out the pre-placement interview recording the information on the pre-placement interview sheet which includes a Privacy Statement</li> <li>• populate the HAP with information from the pre-placement interview once the tenancy has commenced, if a HAP is required</li> <li>• set up a Safe Work Plan if required</li> <li>• be supported by a senior/tenancy manager or an area manager as determined by the placement support specialist</li> <li>• discuss with the applicant the reasons for pre placement interview and table the validated reasons for the interview in accordance with section 4.1 'Selecting applicants for pre-placement interview'.</li> <li>• record that a pre-placement interview has been carried out in Kotahi against a person record, and scan the pre-placement interview sheet to a pre-placement file in objective, created for that purpose.</li> </ul>	
The senior/tenancy manager or nominated	Senior/Tenancy Manager or nominated area staff

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Description	Role Responsible
<p>area staff will:</p> <ul style="list-style-type: none"> <li>• support the placement support specialist in the interview of the applicant, if required</li> <li>• manage the tenancy through the HAP, including making referrals to support agencies as required</li> <li>• recommend the applicant be declined housing or only housed subject to certain mitigating conditions</li> <li>• work with the applicant to sustain their tenancy in accordance with T-240 Household Action Plan Guideline.</li> </ul>	
The area manager (in conjunction with the regional customer support manager) provides advice on whether a pre-placement interview is required or if a match can proceed.	Area Manager
The regional customer support manager (in conjunction with the area manager) provides advice on whether a pre-placement interview is required or if a match can proceed.	Regional Customer Support Manager
The regional manager should be consulted in exceptional circumstances, for example a decision to decline to house an applicant presenting with unacceptable/unmanageable health, safety and security risk	Regional Manager

## 5.2 Pre-placement interview outcomes

Possible outcomes can include:

- offer withdrawn because the property does not suit the household
- the applicant does not pose a health and safety risk to staff or others, and does not require any specialist support to sustain their tenancy – proceed with the offer
- the applicant presents with specialist support needs which are currently being provided by support agencies, or the applicant poses low or medium severity risk but the level of the risk is acceptable – proceed with the offer after confirming on-going support with the applicants support agencies, and applying an appropriate CRIP rating
- the applicant requires specialist support and/or the applicant poses a high severity risk but the risk can be mitigated through the CRIP rating system, safe work planning a HAP or MSD support – proceed with the offer subject to an appropriate CRIP rating

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and applicant agreement to engage with a HAP, or MSD to link the customer with appropriate support services

- the applicant poses an unacceptably high severity health and safety risk, likely/almost certain to occur, a critical risk – the consequences of which would be major/massive and the risk cannot be effectively mitigated through the CRIP rating system and/or the applicant refuses to engage with a HAP or other support agencies – refer to the regional manager to consider the decline to house recommendation, and if approved by the regional manager, withdraw the offer and advise MSD and the applicant that Housing New Zealand declines to house.

### 5.3 Bypass and veto outcomes

- One exceptional outcome of the pre-placement interview process is that the placement support specialist recommends an applicant is bypassed. This outcome can occur based on additional information previously obtained from an earlier pre-placement interview.
- A bypass may occur when the highest priority applicant on the MSD social housing register is considered as unsuitable. This is either due to:
  - the property failing to meet critical aspects of the housing requirements needed for the applicant; or
  - the applicant being unlikely to sustain the tenancy.
- A further exceptional outcome of the pre-placement interview is that the tenancy manager recommends that the property match is vetoed on subsequent matches if the applicant is believed to be an inappropriate fit with the property, or the location of the property they have been matched to by the placements team.
- Bypasses and vetoes are less likely to occur once additional information has been obtained through the pre-placement interview process, and supports and risk mitigations have been put in place to ensure the tenancy is sustainable.

### 5.4 Declining to House outcome

As a result of obtaining additional information from the pre-placement interview Housing New Zealand will, in exceptional circumstances and according to strict criteria, decline applicants that present a high severity health and safety risk to staff, property and/or the community. This decision must be signed off by the regional manager.

## 6. Glossary

Term	Definition
By-pass	A placement process term indicating that an applicant generated by MSD on a list of suitable applicants for a property is not a suitable match and is by-passed by the placement support specialist, the reason why the match is not accepted is recorded
Children's services	Means services that are any of the following:

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Term	Definition
	<ul style="list-style-type: none"> <li>services provided to one or more children</li> <li>services to adults in respect to one or more children</li> <li>services provided to adults living in households that include one or more children, and that</li> <li>do or may affect significantly any one or more aspects of the well-being of those children.</li> </ul>
Fit to return	In the context of formally suspended tenants and excluded applicants – applicants that have been refused housing due to presenting an unacceptably high severity risk but who no longer present such risk. They may be formally suspended applicants that have demonstrated changed behaviours or circumstances, or there may be sufficient support in place as to reduce the severity of the risk they present to Housing New Zealand
Housing need	Is assessed by MSD and indicates the eligibility and priority of an applicant for social housing.
Risk	Any risk that an applicant may present to Housing New Zealand workers, contractors and agents, Housing New Zealand property, other Housing New Zealand tenants and the community.
Unacceptably high severity health safety and security risk	Threshold of risk to be met to decline housing - the applicant poses an unacceptably high severity risk, a critical risk, likely to occur/almost certain to occur, the consequences of which would be major/massive, and the risk cannot be effectively mitigated through the CRIP rating system and/or the applicant refuses to engage with support agencies to mitigate the risk.
Veto	A challenge made by the tenancy manager if the applicant is believed to be an inappropriate fit with the property, or the location of the property they have been matched to by the placement support specialist.
Vulnerable children	Vulnerable children means children of the kind or kinds (that may be or, as the case requires, have been and are currently) identified as vulnerable in the setting of Government priorities under section 7 of the Vulnerable Children Act 2014.
Withdrawal	Is an offer status in Kotahi when a tenancy manager has vetoed a placement match, the applicant remains on the MSD wait list.

## 7. Records

Retain all records within Housing New Zealand's records system - refer 'Records retention and disposal' ([R-105](#)).

## 8. Version control

Details of previous versions are stored in Housing New Zealand's document management system (Objective). Refer to header and footer information for reference document elements or for any queries contact [s 9\(2\)\(g\)\(ii\)](#)

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