



Submission to Safe Places Emergency Accommodation Program

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Introduction

NCWSA represents a range of women's organisations and is a State constituent council of the National Council of Women Australia, and the International Council of Women. We're committed to investing our expertise and resources to further achieve our vision of equality for all women. As a membership organisation we help our community achieve their goals and ambitions. We are an advocacy organisation and seek to represent the voices of our members. With our member organisations and individual members, together we advocate for the rights and advancement of women and girls in South Australia.

We are encouraged by our community and strongly advocate, both here in South Australia and across this country, for improving access to appropriate emergency accommodation for First Nations women and children, women and children from culturally and linguistically diverse (CALD) backgrounds, and women and children with disability. We made our submission to National Plan to End Violence against Women and Children 2022-2032 (National Plan). We highlight that this submission needs to be considered in the context of the objective of the Inclusion Round, which is to projects with the greatest impact for those most urgently in need of support.

About this submission

We welcome the opportunity to provide a submission to the Safe Places Emergency Accommodation Program. This submission was prepared by the NCWSA's standing committees and advisers in the area of Women's Social Issues. As an organisation with 120 years of advocacy history, we advocate for the rights of women, locally, nationally (through NCWA) and internationally (through International Council of Women and our Category 1 Status with the UN's Economic and Social Council, ECOSOC). NCWSA believes that all women are entitled to human rights; where rights are inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, sexuality or any other status, without discrimination.

Our submission

The submission to Safe Places Emergency Accommodation Program is aimed at providing highlights of the need for contemporary efforts to end homelessness in Australia.

There is no universally agreed definition of homelessness. For example, the Australian Bureau of Statistics (ABS) defines it as a lack of 1 or more of the elements that represent home—which may include a sense of security, stability, privacy, safety and the ability to



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control living space (ABS 2012 - Australian Bureau of Statistics 2012. Information paper—a statistical definition of homelessness. ABS cat. no. 4922.0. Canberra: ABS.).

Temporary accommodation can be a lifeline for those trying to get back on their feet after relationship breakdowns, domestic violence, family deaths, drug and alcohol addictions, and the loss of jobs or homes. While short-term or emergency accommodation is important for providing a place for people experiencing temporary crisis situations, it is our view that access to longer term housing support, together with tenant autonomy, are critical features of helping people into ongoing, stable housing of their own. Homelessness is a complex issue affecting many Australians. It requires a long-term and systematic effort across agencies, sectors and the community.

NCWSA through its diverse community membership and support from many South Australians seeks to bring this state together to eliminate homelessness. We note that homelessness has emerged as a global human rights violation even in states that have adequate resources to address it. It has, however, been largely insulated from human rights accountability, and rarely been addressed as a human rights violation requiring positive measures by states to prevent and eliminate it.

Recommendations

NCWSA's view is that currently nobody is building rental housing at the scale it is needed and we are constantly hearing that new construction is delayed.

- We are pleased to know that the development period is of 6 months. However, we recommend there should be a performance audit. While the discussion paper suggests the potential eligibility criteria, it should also include the performance audit to assess whether it demonstrates the delivery timeframe, design features, services and amenities of the emergency accommodation are accessible and appropriate as per the proposal.
- Repair and maintenance activities are an inevitable cost in the life cycle of a dwelling. Construction defects, wear and tear, ageing and environmental factors impact on building components. Planned maintenance programs are important for sustaining higher levels of house function across time. The discussion paper suggests the ongoing maintenance over the 15 year designated use period and a financial viability check on suitable applicants. We recommend the financial viability check shouldn't be a one time affair instead it should be performed on the selected applicants periodically on a regular basis.
- Current regional and remote housing stock is unable to provide consistently healthy and comfortable indoor environments. There seems to be an unstated assumption that what is practically sustainable for governments and housing providers is the undersupply of substandard housing serviced by inconsistent repairs and maintenance.



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Operating and maintenance costs are several times higher for remote housing than in capital cities, so developing strategies to reduce these costs is a key goal. We note that the ongoing supports offered to these places are broadly missing in the discussion paper. We recommend that a suitable strategy should be developed and implemented for these locations.

- We note that attention to climate change is not yet a feature of housing and infrastructure agreements, with inadequate funding and attention paid to climate preparedness in new builds, refurbishments and retrofit programs. This is despite the impact of extreme temperature on both householder wellbeing and health hardware. Temperature increase is already having significant effects in regional and remote areas, with predictions of higher frequency and intensity of extreme weather events, including heatwaves. We recommend that accommodations must therefore provide better cooling performance, while minimising energy consumption by enhancing passive cooling opportunities.
- Current consideration largely extends to the potential provision of split system air conditioning units for existing stock, meeting the minimal requirements of state/territory environmental design measures for new houses and residential tenancy acts for existing houses. In urging attention to climate issues in relation to housing, it is important to recognise the place-based knowledge and practices of First Nations people in adapting to Australia's diverse environmental demands and changing environmental conditions. Alongside First Nations people's capacities to endure rapid and unsettling social, political and economic change, First Nations histories feature resilience and self-reliance in adjusting to extreme or adverse weather events. We recommend the discussion paper should explicitly consider these concerns and develop a suitable strategy.
- We clarify the intent of sustainability and the associated funding requirements for housing under climate change. To this end, we recommend that policy for sustainable housing must interrogate what is being sustained and specify commitments to standards that cannot be compromised on behalf of 'balancing' competing economic, social and environmental priorities. In many Australian jurisdictions, inadequate housing stock of substandard quality is what is being 'sustained'. Sustainable houses are built with structural integrity and robust materials, given climate and household compositional requirements, and are maintained in good working order through effective planned and responsive property maintenance systems. Such systems prioritise health hardware function, not just asset management.
- People with a disability and their households remain one of the most disadvantaged groups within society. Access to social housing, is one measure that governments can take to substantially improve their wellbeing and degree of social inclusion within



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broader society. People with a disability should remain a priority group in the housing allocation processes of social housing providers and more attention should be paid to the interface between health services and housing.

- The housing occupied by people with a disability needs to meet the circumstances of the individual and their household as closely as possible. This includes modifications to the dwelling and on-going maintenance where the disability may require on-going attention. A pertinent example here is for dwellings where a wheelchair user resides. Housing for people with a disability should focus on providing accommodation in places with good access to public transport in order to facilitate access to both services and employment.
- We address two pressing conceptual and policy challenges:
 1. What impact does safe place have on social inclusion for people with disabilities?
 2. How can governments ensure that they maximise the social inclusion benefits from the safe place they provide now and into the future?We address that there are concerns over the capacity of the housing system to cater for the diverse and increasingly complex needs of many people living with a disability.
- Persons affected by other forms of disability, however, are also likely to be at greater risk of homelessness than the general population but their needs have not received the same degree of attention in public debate and policy development. The people with a disability are not a uniform group and their pathways into homelessness – potential and experienced – will vary by disability type, location and severity of their disability. There is therefore a real need to develop a much stronger understanding of the intersection between disability and homelessness. We recommend the Inclusion round should demonstrate the support services offered to this particular cohorts.
- It's a given fact that women are victims to lifelong structural settings that have undermined their fiscal security; however, it's the state of the housing market that is currently pushing so many women into homelessness. A significant gap in wealth accumulation between men and women across their lifetimes is elevating inequality. Women retire with lower superannuation than men due to a range of social and economic factors., and this includes the gender wage gap and time taken out of the workforce to care for children or family members. For many older women it has been a result of a number of factors that has resulted in them needing support.
 1. Many have insufficient superannuation or savings to fund the costs of living due to their life time of caring roles for family, combined with casual work or part time work.



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2. Having raised families, worked part time or in unpaid roles women have retired with considerably less savings and assets than men in their age group.
3. Many have also been forced out of the workforce early and have suffered from systemic age and gender discrimination in the workforce.

We recommend access to safe, secure and affordable housing is fundamental in ending social, educational and economic inequality for women.

- Negative experiences or fears of discrimination and being misgendered are a few barriers to LGBTQIA+ people accessing homelessness services. The nature of accommodation options shouldn't be highly gendered as it puts an additional challenge for people whose gender was non-binary or fluid, with implications for future help seeking. It's our view that traditional views in policy and practice that treat homelessness as a homogeneous category are detrimental to this young cohort. With more young people identifying as LGBTQIA+, a greater number of them are seeking services, support and housing assistance. As we highlight, the effect of a shortage of suitable and safe accommodation and support to assist young LGBTQIA+ people should be eliminated. In our view, such shortfall further entrenches marginalisation and exclusion for this young group. The current predicament of housing and homelessness policy to LGBTQIA+ raises 2 questions:
 1. How can safe places program best meet the specific needs of LGBTQIA+ people?
 2. How does Australian housing and homelessness policy need to change to become more inclusive of LGBTQIA+ people?

We recommend a gender-specific approach to housing and homelessness is essential.

Summation

As stated in the United Nations Human Rights Office of the High Commissioner, the right to adequate housing is a central component of women's right to equality under international human rights law. While international and national laws increasingly recognize women's right to adequate housing, considerable gaps still exist between such recognition and the reality of large-scale denial of this right.

In closing, NCWSA supports the Safe Places Emergency Accommodation Program. We note that several plans have been outlined in the discussion paper to overcome a few critical issues. It is our view that, the discussion paper should also address in depth about overcoming the issues around regional and remote housing, and disability accommodations. We need more specific accommodation options that are conducive to people feeling safe.