

19 October 2023

National Housing and Homelessness Plan  
Department of Social Services  
GPO Box 9820  
Canberra, ACT 2601

Via online portal: [Developing the National Housing and Homelessness Plan – Have your say | engage.dss.gov.au](https://engage.dss.gov.au)

## DEVELOPING THE NATIONAL HOUSING AND HOMELESSNESS PLAN

Anglicare WA is pleased to make the following submission with reference to the National Housing and Homelessness Plan. The discussion points and recommendations contained within the submission have been collated from across Anglicare WA, incorporating the views and responses of front-line workers, program managers, researchers, and our executive.

Anglicare WA is a leading not-for-profit organisation in Western Australia that helps people in times of need. We believe in a just and fair Western Australia where everyone can thrive. We provide support, counselling, and advocacy for people struggling with homelessness, poverty, domestic violence, grief, mental health and other forms of crisis or trauma. Each year, we directly support approximately 1,500 people through 12 specialist housing and homelessness services across Western Australia.

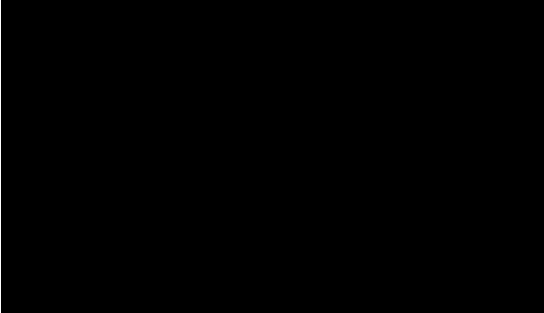
**Developing the National Housing and Homelessness Plan is a tremendous opportunity and we urge the Government to move beyond simply ‘managing’ homelessness and commit to reducing, and ultimately ending homelessness. To this end, it is essential that the Plan considers policies and programs that impact on homelessness across all levels of government and:**

- **explicitly states ending homelessness as its core goal;**
- **sets clear outcome measures, targets and timelines for achieving this goal;**
- **includes budget commitments against the identified actions;**
- **outlines agency or jurisdictional responsibilities against the identified actions;**
- **includes information about how progress towards targets will be monitored.**

We firmly believe that in a wealthy country like Australia, it is possible for everyone to have a safe and stable home, and we look forward to that future.

We thank you for the opportunity to share out insights. [REDACTED]

Kind regards



## ANGLICARE WA RESPONSE: NATIONAL HOUSING PLAN

### TERM OF REFERENCE 1: How can governments and community service providers reduce homelessness and/or support people who may be at risk of becoming homeless in Australia?

The most effective way to reduce, and ultimately end, homelessness is to prevent people from becoming homeless in the first place. To do this, we must understand and remove the drivers of homelessness and help people at risk of becoming homeless to maintain their existing tenancies.

The tight rental market and the severe shortage of social and affordable housing means that homelessness services are overflowing. [2020-2021 Australian Institute of Health and Welfare \(AIHW\)](#) data on unassisted requests shows that:

- 32% of requests for help with short term or emergency accommodation were not met;
- 72% of requests for help with long term housing were not met;
- 16% of requests for help with sustaining a tenancy were not met;
- 56% of requests for help medium-term accommodation were not met.

For the individuals who make up these statistics, the consequences of being turned away from support are devastating: women seeking a pathway out of family violence end up returning to an unsafe home; children are taken into care because their parents are not able to meet their needs while sleeping in cars; friend and family resentments are bred when couch-surfers outstay their welcome.

The only way to ensure people who need help get it, is to ensure crisis and other support services have fewer people coming through the door. As a society, we pay for the missed opportunities that can be gained through prevention measures by putting pressure later onto other service systems, such as acute health, child protection and justice services.

Anglicare WA data shows the top reasons for people seeking homelessness supports are family and domestic violence, housing issues (i.e. housing crisis and inadequate or inappropriate dwelling conditions), family and relationships breakdown, and financial issues (insufficient income and housing affordability stress). Addressing these, and other, drivers to homelessness requires wide policy action, and not just a narrow focus on ways to improve the effectiveness of homelessness services. As an example, we need investment into family and domestic violence primary prevention programs and perpetrator behaviour change programs; mediation and family support services; appropriate supports for people experiencing poverty, mental health, disability, and drug and alcohol addiction; plus targeted prevention for those who are most vulnerable to becoming homeless. However, above all, we need adequate safety nets for people living in poverty, sufficient stock of public and

affordable housing, and strengthened tenancy protections and supports to reduce evictions.

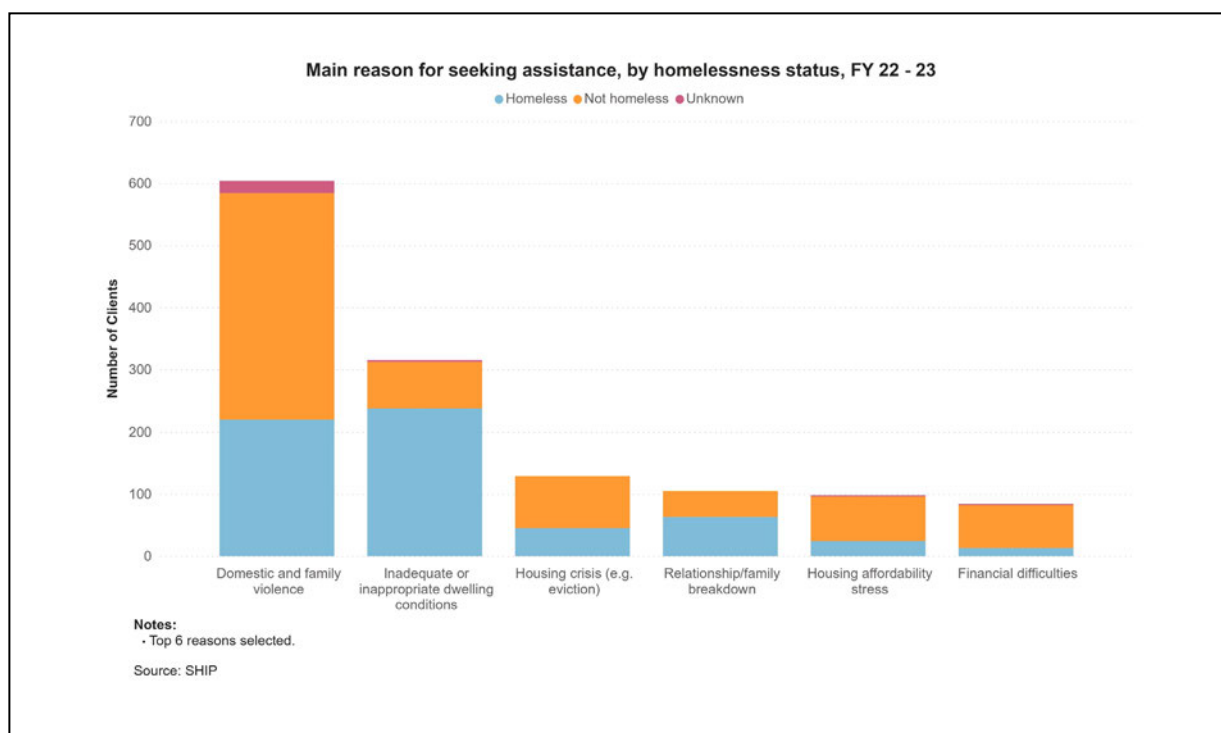


Fig 1. Reasons for seeking assistance – Anglicare WA

### Increase investment in social housing

Governments used to invest strongly in social housing to meet need, but over the past three decades housing stock has not kept up with population growth. Demand for affordable housing now far outweighs supply. In [WA alone](#), there is an unmet need for 39,200 social and 19,300 affordable homes, while a recent analysis by [SGS Economics and Planning](#) estimates that Australia will need an additional 500,000 such homes to meet growing population needs by 2026.

We strongly support efforts by Federal and State Governments to increase the supply of social and affordable housing, especially mechanisms that will provide a steady pipeline of social and affordable homes. Federally, this includes the National Housing Accord 2022, the Housing Australia Future Fund and the \$2 billion Social Housing Fund Accelerator payment.

We strongly support the Federal government's continued investment in social and affordable housing as a guaranteed expenditure, and we encourage similar initiatives. We also urge for equitable distribution of new housing stock in rural areas, and most particularly in regional centres where people might relocate to access education and healthcare services. In addition to the Commonwealth Housing

Affordability Future Fund, we ask that that Federal government support state-based Housing Future Funds to further increase the supply of social and affordable housing over the long term.

Last year, Anglicare Australia released a range of social and affordable housing proposals including a phasing in a regime of tax reform, articulated in the [Homes For All: Roadmap to Affordable Housing](#) report, to remedy the existing inequities. Anglicare WA supports this proposal.

### **Recommendations**

- **Significantly increase the level of funding for social and affordable housing. This will require a range of funding mechanisms, including:**
  - **implementing the Housing Australia Future Fund in addition to guaranteed annual Commonwealth budget spend;**
  - **encouraging State-based Housing Future Funds to leverage available Commonwealth funds in addition to a guaranteed State budget allocation.**
- **Explore opportunities to apply tax settings that support housing outcomes over speculative investment.**

### **Ensure that individuals don't need to choose between food and rent**

Australians are facing increasingly high costs of living. The biggest pressure on household budgets comes from housing, with prices of homes rising much faster than incomes, and skyrocketing rents literally leaving tenants out in the cold (see Fig. 2 below). The graph below shows the percentage of income that Financial Counselling Network clients spent in 2021 (yellow) and 2022 (purple), compared to the general public (grey). When housing expenses take up such a significant percentage of a low-income household's income, there is little leftover for other necessities.

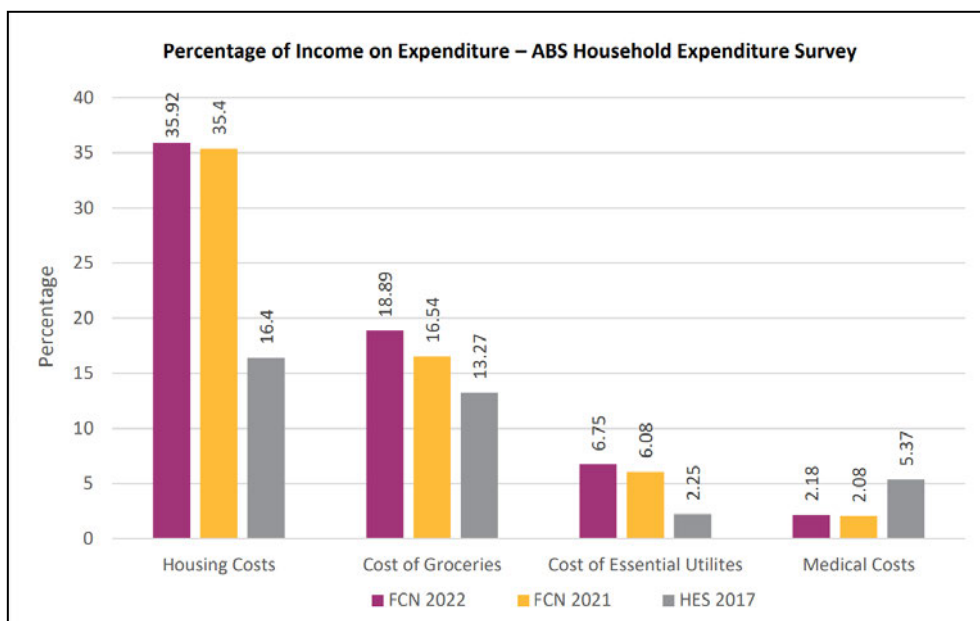


Fig 2. Comparing data collected by the Financial Counselling Network (FCN) to the ABS Household Expenditure Survey (HES) illustrates the significant differences between the expenditure patterns of the average Western Australian household and those experiencing financial hardship.

Source: [WACOSS 2022 Cost of Living Report](#)

In Western Australia, the rental availability and affordability statistics are stark. According to the 2023 [Rental Affordability Snapshot](#), on the date of the snapshot (17/18 March), there were only 2,912 private rentals available, which is 545 fewer than at the same time in 2022 – even though this year's Snapshot included two additional regions. This represents a 16% decline. Of these properties, only 1% were affordable to a person on a minimum wage, and none were affordable for a single person on JobSeeker or Youth Allowance.

These statistics clearly show that people on low incomes are being priced out of the market.

The latest [wages price index](#) shows that wages in between June 2022 and June 2023 rose by 3.6%, well below the 6.0% [increase in inflation](#). The combination of high inflation with lower wage growth, along with drying up of full-time low skill, entry level jobs and a trend toward casual or short contract work<sup>1</sup>, means that more working people are struggling to make ends meet amid the soaring rental costs.

However, most vulnerable Australians are people on income support payments.

<sup>1</sup> Australian Council of Social Services. (2022). How JobSeeker and other income support payments are falling behind the cost of living. [https://www.acoss.org.au/wp-content/uploads/2022/09/ACOSS-cost-of-living-report\\_web\\_v02.pdf](https://www.acoss.org.au/wp-content/uploads/2022/09/ACOSS-cost-of-living-report_web_v02.pdf)

The weekly rate of JobSeeker is barely more than half of the Henderson poverty line.<sup>2</sup> A number of reports (such as the 2022 ACOSS [How JobSeeker and other income support payments are falling behind the cost of living](#)) indicate that social payments are not appropriately indexed and in fact push recipients deeper and deeper into poverty. Last year's [WACOSS 2022 Cost of Living Report](#) shows that a single parent family has just \$9.15 left in their budget after meeting their basic living costs, while an unemployed person is \$13.24 short of being able to meet even those basic needs. The slight increases in income support payments, although welcome, make little difference in the face of rising costs.

Further, the Commonwealth Rent Assistance payment (CRA) which was introduced as a means of assisting low-income households who rent in the private market, is not currently fit for purpose.

CRA rent thresholds and payments are adjusted biannually against changes in general inflation. This indexation does not accurately reflect the average (and soaring) private rental costs and is leaving tenants with increasingly larger gaps to pay. There are also inequities in access to the payment. The CRA is inadequate for people living in share housing, as they are often unable to meet the requirements around lease agreements, and the payment cut-in criteria disadvantages people on lowest incomes, since they have to spend a much larger proportion of their income on rent before they become eligible for the assistance. Because of these issues, only one in three people on the JobSeeker payment is eligible for the payment, one in ten young people out of work is eligible for the payment, and 46% of people who get rent assistance are still in rental stress<sup>3</sup>.

If we are serious about reducing homelessness, we must ensure people have a level of income and access to emergency rent relief that doesn't force them into making choices between whether they would [rather eat or have a roof over their head](#).

### **Recommendations**

- **Increase the rate of JobSeeker and other welfare payments to \$78 a day and link future increases to the Wage Price Index.**
- **Establish the minimum wage as a living wage that is regularly adjusted to maintain a socially accepted minimum standard of living.**

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<sup>2</sup> Anglicare Australia. (2023). *The poverty premium*. <https://www.anglicare.asn.au/wp-content/uploads/2023/09/Australia-Fair-The-Poverty-Premium.pdf>

<sup>3</sup> Anglicare Australia. (2023). *Reforming Rent Assistance*. <https://www.anglicare.asn.au/wp-content/uploads/2023/01/Reforming-Rent-Assistance.pdf>

- **Increase the rate of Commonwealth Rent Assistance and remedy the existing limitations of the Commonwealth Rent Assistance scheme by:**
  - removing the cut-in rate for the payment;
  - indexing payments to market rents rather than CPI;
  - removing requirements for lease agreements.
- **Encourage establishment of State based rental assistance schemes to provide emergency rent relief to households experiencing rent or financial distress.**

### Invest in targeted prevention to groups at risk

Homelessness can happen to anyone and is usually triggered by a range of circumstances outside of a person's control. The reality is that many of us are only a couple of life events away from not having a safe and secure place to sleep – a relationship breakdown; a mental health episode; job loss. In today's market, a family can find themselves homeless simply because they need to move at the end of the lease, and they cannot find another home to rent.

However, some groups are more vulnerable to homelessness than others. According to [AIHW](#), these cohorts include victim/survivors of family and domestic violence, children and young people who have been excluded from their home or who have removed themselves from home, people in rental arrears or in conflict with their landlord, people experiencing a sudden drop in income, First Nations Australians and people exiting institutional settings, such as prisons, acute mental health care or statutory care.

While these groups are united in that they are all overrepresented as clients of homelessness services, they need targeted prevention and intervention strategies that address their unique needs. For example, young people may have insufficient knowledge or experience about how to manage a tenancy and face discrimination in the rental market. They are more likely to live as boarders and can be excluded from receiving Commonwealth Rent Assistance. They not only need additional financial supports, but would benefit from family support services, increased school-based pastoral care and early intervention programs, child and adolescent mental health services, and life-skills programs. On the other hand, homelessness stemming from family and domestic violence can be reduced through strategies such as increased funding for crisis accommodation, family violence brokerage for housing, facilitated access to private rentals, family mediation, legal support – and, importantly, perpetrator behaviour change programs and extensive FDV primary prevention initiatives that reduce gendered violence in the first place.



An effective system of targeted prevention calls for an integrated, whole of government approach, since it requires interventions and supports that sit both within and outside of the homelessness system and homelessness services.

### **Recommendations:**

- **Invest in primary prevention programs that address family and domestic violence, mental ill-health and drug and alcohol abuse.**
- **Invest in early intervention programs, such as Financial Counselling.**

### **Invest in crisis prevention: help people maintain existing tenancies**

Crisis prevention aims to avert imminent housing instability. This might involve supporting people who have received eviction warnings, been instructed to vacate their family residence, or are exiting an institutional setting, such as a justice facility, without a stable housing arrangement. Crisis prevention is often the role taken on by legal services specialising in tenancy support, however it is also provided by specialist homelessness services.

For example, Anglicare WA offers both public and private tenancy support which operates in the metro and some regional areas. The services help tenants at risk of eviction to resolve rent arrears; negotiate repayment plans; address difficulties around methods of housekeeping and home management; access basic budgeting or financial counselling; or managing the appropriate tenancy paperwork. As with other homelessness services across the sector, demand for tenancy support has grown, and we are unable to meet all the requests for support.

It's important to note that tenancy support is not a simple case of helping people address financial difficulties and difficulties in paying rent. Tenancy support services rely on skilled workers who help entire families manage other issues that accompany the threat of imminent homelessness, such as mental and physical health challenges or safety planning. Tenancy support – and, indeed, homelessness overall – is not a 9 to 5 issue, and maximising the effectiveness of homelessness supports relies on sufficient training and staffing, including for after hours and outreach supports.

#### **Case study – example of effectiveness of the Supported Tenancy Anglicare WA (STAR) service, [REDACTED]**

Tony\* was in a private rental for 6 years when his partner walked out, leaving him the sole carer of 5 children, [REDACTED]. He had to give up his job as a FIFO worker and was waiting for his Centrelink benefits, to be changed into his name, thus putting him into arrears with his rent and water bills. Tony also needed support around budgeting, meal planning and managing a household, as he had never done this before and was struggling to cope.

To support Tony, the STAR Housing Case Manager:

- negotiated with real estate agents in setting up a repayment plan that Tony was able to stick to without declining into further debt;
- helped Tony set up CentrePay on his My Gov account, to ensure the money being paid direct to his real estate;
- completed a budget with Tony and supported him with meal plans and linking him in with the Salvation Army who supported with payment of 1 weeks rent;
- researched community ER services that could provide Tony with food vouchers and completed a referral for the local food bank and Telstra Top up, so Tony could put this extra money towards his rental arrears;
- supported Tony for 6 months with fortnightly check in reminders for him to pay his agreed rent arrears and water bill;
- regularly checked in with the real estate to ensure the tenancy was secure and the owner was happy with the agreed plan;
- made a brokerage application to support Tony with payments of his arrears and water debt;
- linked Tony in with financial counsellor (Money Mentors)
- linked the older children with the local community youth club.

Thanks to this support, Tony reduced his rental arrears from \$3,714.29 to \$203.08 and his water arrears from \$1,193.11 to \$292.87. The tenancy was sustained, breach was retracted, and lease renewed. He passed his inspections to a high standard.

Tony accessed additional support from the school for uniforms, excursions, and school fees. He was able to maintain his household budget, cope with balancing childcare responsibilities with meal planning and keeping up to date with his bill payments.

### **Recommendation:**

- **Adequately resource tenancy support services to provide wrap-around interventions that can prevent homelessness for people at imminent risk of homelessness.**
- **Increase the grace period for tenants in public and social housing (excl. North West and Remote) from 6 months to two years when household income increases above the eligibility limits to support people to build savings, support a return to the workforce, and assist in the transition to other housing options.**

## Make homelessness brief and non-recurring:

- By focusing on housing led/'Housing First' principles

As already discussed, the lack of affordable housing is one of the main reasons that people slide into homelessness – but it is also the main reason why people can't climb back out of it.

The limited availability of long-term housing results in bottlenecks within the system, making it difficult for people in transitional and crisis accommodation to progress into stable accommodation. The lack of pathways out of homelessness is distressing, disempowering and intensifies mental ill health and economic exclusion.

While many people who are homeless only require minimal support to sustain a new tenancy once they get it, people experiencing long term and reoccurring homelessness often face complex challenges and require intensive multi-disciplinary support. The '[Housing First](#)' approach prioritises getting people into housing, and then providing targeted support for any other needs that the person might have, such as counselling to support mental health issues or drug and alcohol dependency (as opposed to making access to housing conditional on being 'housing ready').

Extensive cross-sector consultation has seen the WA State Government commit to Housing First principles. It is time for a similar commitment at a national level, combined with a clear plan for implementation of this strategy.

Housing First is recognised as the most successful model to end homelessness for people with high support needs – however, it relies on government commitment to prioritise human dignity and wellbeing, provide appropriate funding to meet the complexity and length of support required by vulnerable individuals, and take greater responsibility for ensuring social and affordable housing instead of leaving it to the private sector to fill this need.

- Through trauma informed practice

Homelessness is a complex issue that doesn't occur in isolation and siloed approaches simply do not work. However, housing, mental health, social, and community services are often separate and not well integrated around the needs of the person and their family. Often, funding, staffing, and resource requirements guide these services rather than contemporary trauma-informed practice.

For instance, funding pressures, lack of appropriate accommodation options, and poor post-release planning can lead to situations where people with unstable

mental health are pushed out of a hospital setting into sub-par accommodation or significant housing stress. This exacerbates their mental health challenges and throws them into cycles of repeated crisis. When supported accommodation is available, services such as counselling are often only available for the duration of stay. Once clients depart, they lose these supports, causing disruptions in care and compounding trauma.

Trauma-informed approaches recognise people's strengths, reflect on and take account of lived experience, offer choice, and ensure that services address all of a person's support needs. It's important to note that providing such support is not merely the responsibility of homelessness service provider who deals directly with the person experiencing, or at risk of homelessness – in order to be effective, trauma-informed practices and recovery-oriented approaches must be embedded into all levels of policy making, funding arrangements and service delivery, and involve effective collaboration between agencies and across sectors.

- **By supporting Advance to Zero approach**

It is essential to increase investment in social and affordable housing if we are to address the issues of homelessness. In the short term, while this housing is coming on line an additional solution is required. Anglicare WA strongly urges the Government to support the '[Advance to Zero](#)' campaign and other similar models currently in place across Australia. Advance to Zero and other like methodologies involve taking a place-based approach to homelessness, emphasises strong collaboration between services, and use detailed data collection about the needs and vulnerabilities of individual street present people. The methodology essentially turns statistics into a name, and supports the provision of a highly specialised, targeted support that helps to ensure instances of rough sleeping are rare, brief, or non-recurring.

Although the Advance to Zero methodology does preference attention on rough sleepers, who represent a small fraction of people experiencing homelessness, the campaign offers good value for money when addressing homelessness because it reduces pressure on healthcare services, the justice system, policing, and other costs.

It is important to note that this approach must be supported by strategies which ensure an adequate supply of transitional and crisis accommodation, in particular for young people, to prevent people from sliding into long term homelessness, and by adequate planning for people leaving institutionalised settings (e.g. prisons).

## **Recommendations**

- **Expand supported accommodation options for people living with complex needs.**
- **Ensure people discharged from hospitals, correctional facilities or institutionalised care receive a comprehensive discharge plan and access to transitional housing.**
- **Embed Housing First principles into the National Housing and Homelessness Plan, along with a clear implementation plan.**
- **Support and appropriately fund Advance to Zero and other place based programs.**
- **Embed trauma informed practice and lived experience leadership into all levels of service delivery and policy making.**

## **Term of Reference 2: How can all levels of governments, along with housing organisations, institutional investors, not-for-profits, and private industry, improve access to social housing, which includes public housing and community housing?**

As already discussed, Housing First principles represent the best practice approach to homelessness. Housing providers can add value to the Housing First model through provision of a Supportive Landlord Model (SLM). SLM aligns with Housing First principles and Advance to Zero methodology and prioritises the provision of affordable and sustainable housing to people with complex needs. The model requires a dedicated person within a housing organisation, or a standalone agency, who coordinates referrals and data, alongside the housing stock from community housing providers such as Housing Choices. Features of SLM include advocacy from agencies with a smaller tenancy portfolio, relative to general community housing portfolios, a strength-based tenancy management approach where supportive and trained tenancy management staff work with the tenant's strengths to support the tenancy and coordination of supports. This might include advocacy, referrals, brokering, psycho-social support, crisis care management and capacity building.

Aside from the Supportive Landlord Model, discussions with Anglicare WA housing staff suggest that the following strategies would help improve the efficiency and effectiveness of the social housing sector:

- Simplifying housing application process and forms.
- Reviewing social and affordable housing income eligibility limits.
- Assessing and allocating priority for housing based on the applicant's current needs, not by application date.

- Lowering other barriers to entry into services, such removing requirements for specialist referrals or the numbers of letters of support needed.
- Allowing house swaps between public housing tenants.
- Directing more resources to completing maintenance works, to ensure that properties remain untenanted for as short period as possible.
- Improving exit planning for people leaving institutions such as hospitals and correctional facilities (e.g. the WA's government to implement the Home Stretch initiative in WA is expected to significantly improve homelessness outcomes for young people transitioning out of care.

Fundamentally, access to social housing is constrained by the lack of social housing stock, as well as crisis and transitional accommodation. This situation is likely to be with us for the foreseeable future.

In WA, the Department of Communities housing waiting lists offer a representation of what type of housing is needed, and where it is needed. Suggesting strategies to overcome the current challenges within the construction sector is outside of Anglicare WA's scope of expertise, but we do urge close consultation and collaboration between government and the construction industry to reduce barriers to speedy increase of available stock.

### **Recommendations**

- **Support upscaling of the implementation of the Supportive Landlord Model.**
- **Incentivise states and territories to prioritise and streamline affordable housing development, such as identifying land for social and affordable housing in local government planning schemes, implementing mandatory inclusionary zoning and planning concessions.**

### **Term of Reference 3: How can governments, across all levels, best work with communities to support better housing outcomes for Aboriginal and Torres Strait Islander people?**

The most obvious, effective, and appropriate way for governments to support better housing outcomes for Aboriginal and Torres Strait Islander people is to listen to what Aboriginal and Torres Strait Islander people need and want.

The National Housing and Homelessness plan represents a significant opportunity to examine learning from existing First Nations-led community housing providers, such as [Noongar Mia Mia](#), and empower more Aboriginal Community Controlled Organisations to manage and control their own housing supply in a way that best meets local need. For example, in Western Australia the WA Housing Authority is set to [transfer 121](#) properties in the south west and metro region to the Noongar Boodja

Trust (NBA), and allocate funds to refurbish and upgrade these properties. Aside from helping to ensure that future management of these properties will be culturally appropriate, one of the benefits of this move is that, unlike the Housing Authority, NBA will be able to leverage these assets for future growth (i.e. use the equity of those homes to grow their investments).

In situations where shifting the control of housing stock or housing services to ACCOs is not feasible or appropriate, design of both the housing facilities and of housing services should be done with the input and support of local First Nations communities, with this inclusion happening right from the brainstorming stage of projects.

Anglicare WA supports the development of a fully integrated plan to support First Nations housing (as, indeed, the development of other sub-plans addressing specific focus areas such as disability housing, or regional housing). There are many complex cultural dimensions to homelessness among Aboriginal and Torres Strait Islander people linked to intergenerational trauma, poverty, ostracization, over representation in the public housing system/under representation in home ownership. A separate plan, which underlines the need for close collaboration with First Nations groups at local level, would provide opportunities for more targeted solutions. This would also be a step towards alleviating systemic racial discrimination that sometimes occurs within our existing structures.

#### **Recommendations:**

- **Ensure that the National Housing and Homelessness Plan aligns with Closing the Gap priorities for housing and self-determination.**
- **Ensure there is enough good quality, community controlled, First Nations housing to meet need.**
- **Develop a separate, fully integrated national plan to support First Nations housing.**

#### **Term of Reference 4: What should governments, private industries, the not-for-profit and community sectors focus on to help improve access to housing and housing affordability in the private market?**

As already mentioned above, current levels of income support and rent assistance are insufficient and poorly designed and leave recipients dependent on these payments struggling to make ends meet. A [recent survey](#) by the Australian Council of Social Service shows that a staggering 73% of welfare recipients are eating less or skipping meals. This is a shocking statistic for a country as wealthy as Australia. We can not state strongly enough the urgent need to lift income support payments and benchmark the Commonwealth Rent Assistance to actual rents.

## Improve rental stability and support renters' rights

Increasing the availability of stock will naturally drive down the cost of accommodation. However, until this happens, renters need protection from unreasonable rent increases, such as often happens in Western Australia.

A recent [Make Renting Fair WA Renters Survey](#) shows that over the last 12 months 17% of responders had their rent increased twice or more. The survey also indicates that almost two in 10 (19%) of responders had large rent increases of between \$76 and \$200 a week. Under upcoming proposed reforms in the Western Australia, it is expected that the rent increases would be restricted to once a year. However, while this is a step in the right direction, there is little point limiting rent increases to once a year if there is no limit to the amount that can be increased.

Due to the current record low vacancy rates, real estate agents and landlords can easily replace tenants, creating a significant power imbalance and contributing to housing insecurity. Renters are powerless to negotiate rent increases without protection from 'no grounds' eviction. The WA Renters Survey indicates that 41% of renters who did try to negotiate the rent increase were refused; and 41% of renters didn't try to negotiate the rent increase, with the most common reason being the fear of losing their lease and not being able to find another property. Likewise, many renters are too scared to request maintenance, worried that this might either lead to a rent increase (62%) or eviction (40%).

Another issue for tenants is lack of minimum standards. Renters bear the cost of energy and water use without the ability to make changes to key efficiency features such as insulation, window coverings, efficient cooking, heating, and cooling appliances. Renters on low incomes are particularly affected, being unable to choose alternative affordable properties, and they thus bear the higher costs of utility bills.

Lastly, consideration must be given to issues surrounding boarders and lodgers, who often live in the most precarious housing but don't have the same basic rights and protections in legislation as any other tenant would have. In WA, boarders, lodgers, and their landlords currently rely on common law rights and remedies, and outdated public health legislation. Imperfections in this system result in lack of minimum room standards, no formal requirements with respect to privacy, disputes over house rules and little regulation around bonds.

Government intervention to bring about national standards around tenancy agreements is essential to establish a more level playing field for renters.



## **Recommendations**

- **Implement a national framework for tenancy law reform to improve renters' rights and conditions. Measures to include:**
  - **Limiting rent increases to one increase per year.**
  - **Limiting rent rises by:**
    - **capping rent rises at CPI;**
    - **requiring the landlord to justify a rent increase above CPI;**
    - **linking rent increases to average wage increases; or**
    - **a combination of the above.**
  - **Outlining measures for better enforcement, oversights, and accountability so that compliance is the norm.**
  - **Ending no ground evictions - including at the end of a fixed term.**
  - **Implementing minimum standards for all housing including energy efficiency and introduce a mechanism for enforcing them.**
  - **Extending legal protection to boarders and lodgers.**
- **Encourage establishment of State based rental assistance schemes to provide emergency rent relief to households experiencing rent or financial distress.**

### **Term of Reference 5: How can governments, the private and community sectors, help to improve sustainable housing and better prepare housing for the effects of climate change?**

Energy efficiency is rarely maximised, or prioritised, in social housing, leaving our most vulnerable people and communities the least protected from the worst impacts of climate change. Older housing often lacks features such as insulation, shade, and solar panels. This not only leads to increased energy consumption (and thus, increased energy costs) but also makes it difficult for residents to regulate indoor temperatures. Additionally, the installation of solar panels is often not prioritised by landlords, as subsidies are typically applicable only to one's own residence, leaving tenants with high energy bills.

While the effects of climate change are being felt across the country, people living in northern Australia are dealing with particularly difficult conditions, with home temperatures [regularly reaching 50-60C](#). For example, the ['Stuck in the Heat'](#) report by [Kimberley Community Legal Services](#) highlights that public housing tenants in the Kimberley face numerous barriers in coping with extreme heat, with poor-quality housing, maintenance issues, and overcrowding exacerbating challenges associated with controlling temperatures and energy efficiency within their homes.

Many residents are forced to grapple with high energy prices and inefficient cooling appliances, leading to energy poverty and a reluctance to use air conditioning due to the associated costs. Moreover, public housing tenants in the Kimberley region are often connected to power through a pre-payment method, which can lead to ongoing power outages if funds run out. This not only results in the loss of air conditioning but also jeopardizes the safety of refrigerated medication and food storage. It's important to note that living in extreme heat is not only a matter of discomfort – takes a toll on psychological and social well-being, contributing to increased tension, difficulties sleeping, and poor mental health.

Besides increasing temperatures, another aspect of climate change is increased fire, flooding, and cyclone activity, increasing risks for housing damage.

This year, towns and communities in the Fitzroy Valley in WA's north west have been hit by flooding caused by torrential rain from cyclone Ellie, creating a vast inland sea across the flood plain, displacing hundreds of people and destroying much of the accumulated housing stock.

Insurance can safeguard against home or content loss due to fire or flood. However, many lower-income households lack sufficient coverage. Research by the [Brotherhood of St Laurence](#) found that 32% of low-income Australians lack home and contents insurance, exposing them to significant financial risk during extreme weather events. Affordability is a significant barrier to obtaining adequate insurance, especially in areas prone to climate-related hazards which carry higher insurance premiums.

### **Recommendations:**

- **Improve access to air conditioning for public housing tenants, considering current climatic conditions to mitigate heat-related health risks.**
- **Increase subsidies for electricity costs for low-income households.**
- **Facilitate greater adoption of solar energy by:**
  - **Installing solar panels on public housing properties.**
  - **Extending solar power subsidies to private landlords to encourage renewable energy adoption among tenants.**
- **Prioritise hazard-resilient public housing, e.g. by constructing homes with flood, cyclone or fire resistant materials, implementing flood, cyclone or fire power and plumbing strategies, and retrofitting existing public housing with energy-efficient features like insulation to enhance sustainability.**
- **Review home insurance affordability and coverage:**

- **Conduct an independent review of the current and future affordability and coverage of home insurance for low-income households in areas prone to extreme weather events, trial home insurance subsidies and climate risk mitigation programs for people on low incomes.**
- **Explore trial programs that offer home insurance subsidies for low-income individuals and families.**
- **Develop climate risk mitigation initiatives tailored to the needs of people with limited financial resources, focusing on disaster-prone regions.**

### **Term of Reference 6: How could governments work better with industry, community services and other organisations to improve housing outcomes for all Australians?**

#### **Listening to experience**

The community sector has an enormous amount of expertise and knowledge, interest in innovation, and motivation to solve homelessness. We strongly encourage governments at all levels to tap into this wide knowledge base and energy for change.

However, even beyond this sits the most important reference group: the people who experience homelessness and are living with the outcomes of existing policies. Their insights are difficult to get without direct consultation since their stories are often unwritten and unrecorded. While we do see attempts to incorporate the voices of lived experience into service or policy design, all too often these attempts are tokenistic and do not truly represent the preferred 'co-design' practice. The development of a National Housing and Homelessness Plan presents an opportunity to take a human centered approach to policy making, and to this end, we urge the government to refer to the [Lived Experience Framework](#). This framework is a joint initiative of Queensland, New South Wales, Victoria, Tasmania, Northern Territory and Western Australia Council of Social Service representatives and lived experience advocates, and it suggests the principles and practices for effective lived experience partnerships.

#### **Recommendation:**

- **Elevate and amplify the voice of lived experience in all stages of design and implementation of the National Housing and Homelessness Plan.**

## Sustainable funding of services

It is a concern that some well-regarded, effective housing and homelessness services are currently operating in deficit. An example of this is [Y-SHAC](#). While the WA State Government's courage to fund a project such as this is applauded, the current levels of funding are not representative of true levels of costs required to maintain a safe service. Anglicare WA currently subsidises Y-SHAC for it to remain open. This is despite the service implementing extensive cost cutting measures over the past few years, which included undergoing an internal financial sustainability review that concluded there are no further efficiencies to be found.

Clients coming into the homelessness system, particularly in the youth sector, are increasingly having more complex needs. People whose needs are not met within the over-stretched mental health system are often finding themselves in residential accommodation services, resulting in workers at the homelessness front line holding more clinical risk than they had in the past. Funding hasn't kept up with the level of skill, training, and clinical governance that staff now need to hold in their positions to manage these risks. Furthermore, Equal Remuneration Order increases have pushed the contract expenditure for services up significantly. While this has resulted in much fairer not-for-profit salaries, it came without sufficient contract indexation and with inadequate ERO supplement payments. The tightness of the funding system doesn't allow more than one member of staff working at night in 24 hour services, despite a lot of after hour escalations happening at that time, creating issues for service delivery.

### **Recommendations**

- **Urgently review the true cost of operation of existing contracts and increase funding to equal service delivery to pre ERO levels.**
- **Ensure that the Wage Price Index and CPI is reflected in indexation policy across homelessness services.**
- **Embed flexibility into new contracts to allow for changes and experimentation if emerging needs require a different response from services.**

## Strengthening and coordinating responses

The WA All Paths Lead to Home strategy is underpinned by 'No Wrong Door' principles, and we encourage the National Housing and Homelessness Plan to be designed likewise. 'No Wrong Door' ideology encourages collaboration among organisations and emphasises the messaging of homelessness as 'everyone's responsibility'. While it encourages diverse groups like schools and police to get involved, there is a need for improved coordination through commissioning and contracting. Existing contracts have not been upgraded to provide the holistic, integrated (and often, an out of hours) outreach support that is required under the Strategy. The networks that exist are mostly informal arrangements between not for profits rather than ones actively supported or invested into by government.

The system as a whole is highly complex and difficult to navigate. Sector knowledge regarding Housing Support Services funding programs is patchy, and referral pathways are somewhat fixed in certain programs.

While the By Name List is a highly regarded, functional tool, which is effective in providing a better understanding of the pathways and needs of rough sleepers and people experiencing chronic homelessness, there is still no effective system which allows either staff or service users to easily identify where vacancies exist. There are limited options for data sharing, and clients are repeatedly required to retell their story as they access services across the sector. While plans are in place in WA to develop a more effective homelessness portal, action on this is currently stagnant.

The Specialist Homelessness Information Platform (SHIP) is an effective client management system used by many services, which is customisable to service level. However, it limits opportunities for cross-service integration, collaboration, and implementation of No Wrong Door principles. Users can only view their own client information and program data, and the system does not allow information to link across multiple programs. This makes it difficult to track client journeys and implement efficient referral pathways. Service users are regularly retraumatized by having to tell their stories over and over again – and in some cases, it leads to inefficiencies and clients trying to play services against each other.

### **Recommendations**

- **Improve data sharing between housing and homelessness service providers, e.g. by opening up SHIP referral pathways within the database. (This already operates successfully in some states.)**

## **Additional points to the outlined Terms of Reference**

It is imperative that the Government develops a separate plan to address child and youth homelessness, in addition to the National Housing and Homelessness Plan.

Children under 18 who flee or are excluded from the family home are usually homeless due to family and domestic violence and abuse. This vulnerable cohort not only lack accommodation, but also the adult guardianship and support that is critical to their development. They often lack basic independent living skills, are likely to be experiencing a high level of psychological distress and are open to victimisation, exploitation, and further abuse. Income supports for this group, in the form of Youth Allowance, is even lower than what is available to older people – an ironic situation given as young people often have not had the opportunity to amass the most basic material assets needed for independent living. Distressingly, they are unlikely to know where to turn for help – and when they do, they are often turned away since services are at capacity.

These issues call for specialised interventions tailored to individual developmental stages and needs. Beyond assistance within the homelessness service system, support for homeless children should extend to connections with external services such as schools, adolescent health services, youth services, and child protection.

To prevent child homelessness, a targeted approach is essential, leveraging networks in schools, interactions with police, and family support systems to identify and address the risk of homelessness early. Similar to children, young people aged 18-24 have unique support needs, including trauma, lower incomes, and difficulties affording housing, necessitating tailored assistance for a successful transition to adulthood.

## **Recommendations**

- **Develop a standalone national plan to specifically address child and youth homelessness, acknowledging the distinct systems and services require to effectively prevent and respond to homelessness in this demographic.**
- **Ensure immediate investment in proven youth homelessness solutions, including an increase in funding for new crisis and transitional services.**

**Case study: positive impact of well-integrated, outcomes focused solution to address youth homelessness – Foyer Oxford**

*Foyer Oxford is a program providing housing and support for young people aged 16-24 at risk of homelessness or experiencing disadvantage. It offers transitional apartments, including units for young parents and their children. Residents stay for up to 2 years, receiving weekly case management support to help with education, training, and life skills.*

*Foyer Oxford follows the Foyer Foundation model, focusing on creating a diverse community, nurturing young people's skills, providing inspiring living environments, and offering a comprehensive service package covering housing, independence, finance, health, education, and employment. Foyer Oxford also collaborates with mainstream and community partners and emphasizes learning and impact evaluation.*

*Annually, Foyer Oxford supports approximately 150-180 young people from diverse backgrounds, many of whom have complex challenges. During the first 6 months of 2023, 52% of Foyer's residents exited into private rentals, 27% were re-unified with family and even one young person purchased their own property. Furthermore, 88% were engaged in employment, education, or training. A 12-month follow-up showed that these positive outcomes were sustained long-term.*

*Many young residents also face mental health issues, with around 80% having a mental health diagnosis. To address this, Foyer Oxford now has a Therapeutic Specialist improving access to mental health support and external services. For 26% of young people, this was their first engagement with mental health support.*