



Australian  
**HEALTH  
PROMOTION**  
Association

A submission to the Department of  
Social Services consultation on

# **The national housing and homelessness plan**

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## INTRODUCTION

The Australian Health Promotion Association Ltd (AHPA®) welcomes the opportunity to provide a submission to the consultation on the National Housing and Homelessness Plan. As Australia's peak body for health promotion, AHPA advocates for the development of healthy and safe living, working and recreational environments for all people. Through our work we support the participation of communities and groups in decisions that affect their health.

Australia is one of the healthiest countries in the world. This is largely because of effective public health and its core services – protection, prevention and health promotion which includes action to create and support the social and environmental conditions that enable Australians to enjoy a healthy and happy life. We are now more aware than ever of just how complex the circumstances are by which human health is influenced – policies and actions shaped by the unfair distribution of wealth, power and resources, both locally and internationally. We are also more cognisant of the range of skills and practices required to enhance individual and community capacity and act to address those forces that lead to health inequities - the unfair and avoidable differences in health status seen within and between countries. **Health promotion's role has never been so significant.**

AHPA encourages a focus on access to appropriate, affordable, safe, and secure housing for all in recognition of the importance of housing as a key social determinant of health and shelter as a fundamental prerequisite for health. We recognise that 'homelessness' is more than just 'rooflessness' (Crawford et al., 2014). Australian definitions of homelessness incorporate a range of experiences including lack of suitable accommodation, inadequate housing conditions, unstable tenure, and lack of space for social interactions (Australian Bureau of Statistics, 2023).

### **About Us**

Incorporated in 1990, AHPA is the only professional association specifically for people interested or involved in the practice, policy, research and study of health promotion. Our member-driven national Association represents over 1000 members and subscribers and is governed by a Board at the national level with operational branches representing all states and territories. Membership of AHPA is diverse, and includes designated health promotion practitioners, researchers and students, as well as others involved in promoting physical, mental, social, cultural and environmental health, whose primary profession or area of study may be something different, but whose responsibilities include promoting health. Members represent a broad range of sectors including health, education, welfare, environment, transport, law enforcement, town planning, housing, and politics. They are drawn from government departments and agencies, universities, non-government organisations, community-based organisations and groups, private companies, and students.

Our activities include: national registration of health promotion practitioners for the International Union for Health Promotion and Education in Australia; national health promotion university learning and teaching network; early career support; national and local conferences and events; a tri-yearly Population Health Congress (with partners: Public Health Association of Australia, Australasian Epidemiological Association and Australasian Faculty of Public Health Medicine); a website providing professional and membership information; a national listserv providing members with sector news, employment, advocacy and events information; stakeholder and member communication across a range of platforms; advocacy action; strong partnership working with a range of organisations; awards; traineeships; mentoring; scholarships and bursaries; and the Health Promotion Journal of Australia, which has a strong focus on health equity and participation by First Nations people.

### *Our Vision*

A healthy, equitable Australia.

### *Our Purpose*

Leadership, advocacy and workforce development for health promotion practice, research, evaluation and policy.

### *Our Principles*

- Ethical practice - Supporting culturally informed, participatory, respectful, and safe practice.
- Health equity - Addressing the sociocultural, economic, political, commercial and ecological determinants of health in order to build health equity.
- Innovative and evidence informed approaches - Promoting and supporting evidence informed research, policy and practice.
- Collaboration - Working in partnership with other organisations to improve health and wellbeing.

#### *Our Strategy*

1. Promote our profession and members
2. Advocate for health promotion
3. Build professional capacity of AHPA members
4. Support career pathways in health promotion
5. Promote equity, diversity and inclusion
6. Provide responsible and sustainable governance and management

Detailed actions to achieve the strategy can be found in our [Strategic Plan](#) document.

#### ***Achieving change***

Shelter is a critical pre-requisite to health as stated in the Ottawa Charter for Health Promotion (World Health Organization, 1986). The right to housing has also been codified in the Universal Declaration of Human Rights (United Nations, 1948) and the International Convention on Economic, Social and Cultural Rights (United Nations, 1966). AHPA notes that the Organisation for Economic Co-operation and Development (OECD) has identified housing as one of several elements essential for quality of life, along with health, safety, income, jobs, and community (OECD, 2020).

However, not everyone has equal access to housing or to housing that meets their needs or protects their health and wellbeing. Increasing cost of living pressures have exacerbated existing faultlines in Australia's housing system, amplifying the need for a range of strategies to address the current crisis and create a sustainable plan to ensure every Australian is housed for the future. Urgent action is needed to address the widening inequities in access to housing and the wider impacts of the rental crisis. We encourage the inquiry to consider the impact of increasingly unaffordable housing on physical and mental health, social participation, and access to other social services.

#### Key principles:

- Access to safe and secure housing is a human right as part of the right to an adequate standard of living
- Access to appropriate, affordable, safe and secure housing is a key social determinant of health
- Poor quality, unaffordable housing and homelessness have adverse effects on physical and mental health
- Sufficient affordable and appropriate housing to meet need would provide significant positive impacts

#### AHPA recommends:

- Greater research and intervention to address the reciprocal relationship between health and housing.
- Engagement with industry is important, however their role should be transparent and their participation in policy making processes limited.
- Those with lived experience should be given an opportunity to participate in decision-making based on co-production principles to address the long-term challenge of housing for all.
- Examine the experimental and innovative practices developed during the pandemic for effectiveness and where these were effective incorporate them in national and jurisdiction-specific plans.
- Primary prevention strategies to address homelessness.
- Scale up Housing First approaches.
- Greater health services, social support, and recovery-oriented support to complement housing interventions.
- Resourcing and scaling up a broad range of evidence-informed interventions, particularly to address health for those experiencing homelessness.
- Increased resourcing for homelessness support, with current services overwhelmed across Australia.
- Responses to homelessness that consider pets in formulating supports for people experiencing homelessness.
- Introduction of national regulations that prohibit "no pet" rules or requirements except for reasonable grounds such as health interests of other co-habitants.
- Stimulating/funding cross-sectoral programmes to address homelessness.
- The role of local government authorities in responding to homelessness is made more explicit and integrated in national and jurisdiction-specific plans.
- Improving access to social housing by increasing stock and improvements to the quality of current social housing.
- Development of a national social housing data set.
- Data on the whole stock of social housing (not just public housing or community housing).
- The public and social housing pipeline will require investment from both State *and* Federal levels of government.



**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 issues paper reports estimates of homelessness using Census data, however reliance on reporting statistics from a single data source and one collected only once every 5 years risks missing detail on the number and characteristics of people experiencing homelessness (Flavel et al., 2022). The average number of people accessing Specialist Homelessness Services increased by 8% between 2018 and 2022, with the fastest increase being for Aboriginal and Torres Strait Islander people and people experiencing mental ill health (Pawson et al., 2022).

It is also important to look beyond national figures on homelessness. The number of Specialist Homelessness Service users in regional Australia grew at double the rate of capital cities between 2018 and 2022 (13% compared with 8%) (Pawson et al., 2022). The largest increases were in regional Queensland and regional Western Australia (29% and 35% respectively) (Pawson et al., 2022).

The 2022 Australian Homelessness monitor stated that the National Housing and Homelessness Plan can change the trajectory of homelessness in Australia but to do this the plan must incorporate prevention measures. The two key policy levels emphasised in the 2022 National Homelessness Monitor were increasing income support and increasing rent assistance. The average number of people accessing homelessness due to inability to pay rent rose by 27% between 2018 and 2022 (Pawson et al., 2022), and is likely to have risen by even more since 2022 with the cost of living crisis (Pawson et al., 2022).

The COVID-19 pandemic triggered increased spending on homelessness emergency expenditure and an openness towards experimenting with new and different approaches in homelessness policy and practice (Pawson et al., 2022). It stimulated enhanced cross-sectoral working practices, better integration of government and NGO homelessness service planning and provision, and improved service delivery growth and monitoring of housing policies and programs that rely on evidence. Homelessness is a cross-sectoral issue that is closely related to key social determinants of health (Flavel et al., 2021). The advances in homelessness policy and practice were promising but fall well short of changes needed to adequately address homelessness and rough sleeping in Australia (Pawson et al., 2022).

The role of local government authorities in responding to homelessness has been largely unrecognised in Australia (Pawson et al., 2022). In some local government areas, local government authorities are already significantly involved in local efforts to reduce homelessness (Pawson et al., 2022). An example is the Council of Capital City Lord Mayors Housing and Homelessness Working Group. The role and opportunities for local government to contribute towards national and state efforts to end homelessness need to be made explicit and coherently integrated within the National Housing and Homelessness Plan (Pawson et al., 2022).

Increases in income support and rent assistance have been identified as key for improving housing affordability and preventing homelessness for those at risk of homelessness, and were also identified as key measures to break the cycle of intergenerational disadvantage (Pawson et al., 2022).

While the Housing Australia Future Fund and direct investment in public and social housing dwellings will generate new dwellings in the short term, further investments will be needed beyond 2025 to ensure a continued pipeline of affordable and social housing (Pawson et al., 2022).

**1b. How can the homelessness system more effectively respond to those at risk of, or already experiencing homelessness?**

It is critical to take an expansive view of who is without safe and affordable housing. For example, migrants from culturally and linguistically diverse backgrounds are relatively invisible in state and federal housing policy. This is despite 2021 Census findings indicating around half of Australians were born (or had a parent born) overseas (Australian Bureau of Statistics, 2022) and data also revealing that people born overseas are overrepresented in Australian homelessness estimates, representing around 46% of all homelessness in 2021. The majority were living in severely overcrowded dwellings and boarding houses. Other data has also suggested that migrants experienced higher rates of homelessness than people born in Australia (Kaleveld et al., 2019).

A cultural definition classifies homelessness into primary, secondary and tertiary homelessness. (Chamberlain and MacKenzie, 2008). Primary homelessness is characterised by 'being without 'conventional accommodation'; living on the streets, sleeping in parks, squatting in derelict buildings, living in improvised dwellings (ie sheds, garages or cabins), and using cars for temporary shelter'. Secondary homelessness is characterised by 'moving frequently from one form of temporary shelter to another, such as emergency or transitional accommodation or supported accommodation'. Tertiary homelessness is characterised by 'living in boarding houses on a medium to long-term basis (13 weeks or longer)' (Blackford et al., 2022). Evidence shows that secondary and tertiary homelessness is more commonly experienced by migrants than primary homelessness (Kaleveld et al., 2019). These definitions should be carefully considered in policy and service delivery.

Consumer choice is vital, with implications for consumer satisfaction and intervention efficacy. Aubry and colleagues (2019) note that choice of housing options was linked to enhanced satisfaction with housing arrangements. A commitment to meaningfully engage people with lived experience and prioritise these perspectives in the development, implementation, and evaluation of housing and homelessness-related interventions should be pursued (Crawford et al., 2022).

Pets/companion animals are a vital support to many people at risk of, or experiencing homelessness, reducing loneliness, isolation (Slatter et al., 2012, Taylor et al., 2004), protecting from suicidal ideation (Scanlon et al., 2021), depression, substance misuse and criminal activity (Lem et al., 2013). For homeless people and many people at risk of such, pets are their closest friends and companions and perceived as kin (Scanlon et al., 2021). Pet ownership can break down barriers between people experiencing homelessness and the general population bridging the stigma of difference (Irvine et al., 2012, Irvine, 2013).

No pet policies ignore and actively cut off the powerful protective and positive impacts of pets in the lives of homeless people. Provision of pet friendly accommodation and services from homelessness services can prevent the harmful health effects associated with the loss of a pet. This support for homeless pet owners needs to include more than merely accepting pets into services and housing and must also be cognisant of the needs of animals - poor consideration of animal needs can exacerbate tensions between people (Labrecque and Walsh, 2011), and may engender inadequate animal welfare. Homelessness services also need to ensure that pet ownership is supported in terms of resources such as pet food, pet beds, bedding, access to appropriate activity areas (e.g. grassed areas for dogs to toilet, high shelves for cats or birds to perch).

### **1c. How can the homelessness system ensure those at risk of homelessness or in crisis receive appropriate support to avoid homelessness or so they are less likely to fall back into homelessness?**

Housing provision to support people with mental health challenges who are vulnerable to homelessness is critical. Housing First offers a model which provides the dignity of housing regardless of other health comorbidities and is cost-effective (Gulcur et al., 2003; Stefancic et al., 2007). Engagement and retention in Housing First models may be enhanced when clients with mental health and substance use diagnoses are provided with the option of actively participating in their treatment decisions (Padgett et al., 2006). Housing First models should be effectively resourced and scaled up.

Studies suggest a high prevalence of health needs for people experiencing homelessness (Somers et al., 2013). There is a need for health services, social support, and recovery-oriented support to complement housing interventions. Resourcing and scaling up a broad range of evidence-informed interventions, particularly to address health for those experiencing homelessness is vital. For example, Schueller and colleagues (2019) have found that mobile phone-based interventions are feasible and acceptable to engage young people experiencing homelessness while other research has also noted the potential of technology-based interventions to engage young people experiencing homelessness and mental health challenges, to enhance engagement with mental health interventions (Winiarski et al., 2020).

Pets play an important health promoting role, particularly for people experiencing homelessness and others who lack support from families and close friends (Friedmann and Thomas, 2016). Homeless people experience pre-emptive grief and fear at the potential loss of a pet due to being confronted with a choice of accepting housing that does not accept the animal that is their closest relationship (Scanlon et al., 2021). Putting people experiencing homelessness into the position of making this choice increases the risk of them falling back into homelessness.

**2. How can governments, across all levels, best work with communities to support better housing outcomes for Aboriginal and Torres Strait Islander peoples?**

The National Aboriginal Community Controlled Health Organisation's (NACCHO) submission to the Productivity Commission's National Housing and Homelessness Agreement Review contains relevant recommendations from the Aboriginal community controlled sector on how to support better housing outcomes for Aboriginal and Torres Strait Islander peoples (National Aboriginal Community Controlled Health Organisation, 2022). The NACCHO submission highlights that housing is one of the most critical social determinants of health and advocates for a major investment in housing to address the health objectives of Aboriginal and Torres Strait Islander people (National Aboriginal Community Controlled Health Organisation, 2022).

The NACCHO submission highlights the impacts of living in overcrowded housing on prevalence of disease, noting the link between mental health issues and overcrowding and homelessness (National Aboriginal Community Controlled Health Organisation, 2022). Aboriginal and Torres Strait Islander people have higher rates of homelessness and higher rates of overcrowding compared with non-Indigenous Australians (National Aboriginal Community Controlled Health Organisation, 2022).

**3. How can all levels of government, along with housing organisations, institutional investors, not-for-profits, and private industry, improve access to social housing, which includes public housing and community housing?**

AHURI research (Levin et al., 2023) suggests the social housing sector should be viewed by governments as a component of the broader housing market rather than a standalone system. Their research also suggests that social housing needs should be considered on a broader continuum to determine more granular housing and support needs.

A key to improve access to social housing is through increasing the stock of public housing. From 1945 to 1970 social housing properties (primarily public housing) averaged 16% of total national residential construction and between 1951 and 1996 there were between 8,000 and 14,000 social housing dwellings built per year (Per Capita, 2022, Lawson et al., 2019). The public housing stock began declining in 1996, and only grew by 4% from 1996 to 2016, far below the 30% population growth over this period (Lawson et al., 2019). In 2016 it was estimated that there was a shortfall of 433,000 social dwellings, and Australia would need 726,000 new social housing properties by 2036 taking population growth into account (Lawson et al., 2018). Separate research in 2019 calculated a very similar estimate of 728,600 new social housing properties needing to be built by 2036 (Troy et al., 2018). Meeting this need for social housing would require 36,000 new social housing properties to be built per year (Per Capita, 2022). In 2017-18, Australia's stock of social housing represented 3.1% of total housing. This is much lower than in the UK where social housing is 16% of total housing, and in Austria where social housing is 37.7% of total housing (Per Capita, 2022).

The government's Housing Australia Future Fund is unlikely to be effective in fully bridging the gap between current social housing and the number of dwellings needed. Direct investment in public housing is the most effective means of increasing the supply of affordable housing, rather than relying on the private sector to provide the bulk of social housing (Lawson et al., 2018). A reliable pipeline of public and social housing dwellings over a longer term than currently funded will improve access to social housing. This pipeline of public and social housing will require investment from both State *and* Federal levels of government, not one or the other, along with collaboration with private not-for-profit and for-profit partners (with transparency and limited policy influence) (Benedict et al., 2022). AHURI research suggests that strategies could include public private partnerships, mixed tenure developments, tax subsidies for affordable supply, home ownership schemes and build to rent programs (Benedict et al., 2022). In addition, other creative strategies could be scaled for example, well-regulated tiny houses, more housing co-ops, purpose built boarding house accommodation (Wheeler, 2022).

In addition to increasing the stock of social housing improving access to social housing requires improvements to the quality of current social housing (including currently vacant housing) by investing in maintenance and energy efficiency. This issues paper points to the need to develop a national community housing data set. Data on the whole stock of social housing, not just public housing or community housing, would enable better monitoring of housing policies and programs to provide evidence on the success or otherwise of policies and programs and identification of where growth is needed.

Beer and Prance (2013) have suggested that the most common role played by local governments has been in planning for affordable housing. Local governments could play a greater role in bridging the gap between affordable housing and homelessness policy including by facilitating localised responses to homelessness including partnerships and coordinating place-based responses to homelessness (ShelterWA, nd).

Beer and Prance (2013) also suggest four key strategies for local governments: advocacy on behalf of priority populations in their communities; 2. building awareness amongst councillors and the community about the homelessness causes and consequences; facilitating networks with social services; and, 4. planning. However clear guidance, resources and overarching policy is needed to provide local governments with the support needed to effectively respond.

#### **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?**

Federal, State and Territory governments have the key role in improving access to housing and housing affordability. Social housing needs to increase, and direct investment from government (state *and* federal as recommended by National Shelter, not one or the other) is most effective to increase social housing.

Action also needs to be taken to improve security of rental properties and reduce inequality in home ownership. Housing in Australia has been rated as extremely unaffordable to buy since the early 2000s (Demographia, 2023). The introduction of the Capital Gains Tax discount in 1999 caused growth in house prices to diverge sharply from growth in wages (Per Capita, 2022). In the 1990s the average house price was around 2.5 times annual household income. Average house prices were more than six times household income in 2020 (Per Capita, 2022).

Current policies such as the combination of the Capital Gains Tax Discount and negative gearing provide an incentive for investors to pursue capital gains through the property market with negative gearing acting as a subsidy. Almost half the benefits from negative gearing go to the top 20% of income earners, and more than 80% of benefits from the capital gains tax discount go to the top 20% of income earners (Per Capita, 2022), fuelling income and wealth inequality and contributing to growing inequality between people who own their own their own home and people for whom buying their own home is now out of reach due to the negative impact of these policies on housing affordability.

Tax concessions such as the capital gains tax discount and negative gearing have pushed many first home buyers out of the housing market and these policies and the reduction in the public housing stock have undermined security of tenure for renters (Per Capita, 2022). Negative gearing and the capital gains tax discount provide incentives to chase capital gains in the short term instead of longer-term income streams from rental properties (Per Capita, 2022).

Increasingly unaffordable housing has resulted in increasing demand for rental properties, and low wage growth over the past decade has increased demand for affordable rental properties. Strong population growth including from migration has added to the demand for affordable rentals (Parliament of Australia, 2008). Inadequate funding for social housing has impacted on the supply of affordable rental properties. In addition, efforts by governments to reduce the costs of housing by releasing land are undermined by developers who limit the pace of release of land to maximise profits.

A 2022 report by Prosper Australia investigated the rate of lot sales in nine master-planned housing developments, finding that developers used a staged release approach aimed at securing profits by avoiding supply-led price declines (Fitzgerald, 2022). The Master Planned Communities still held more than three quarters of land vacant after almost 10 years of production time (Fitzgerald, 2022). The report provides evidence that planning constraints are not the reason for the delayed land releases, which were found to be responsive to price-growth (Fitzgerald, 2022).

The combination of housing being severely unaffordable to purchase, low wage growth resulting in housing costs representing a higher percentage of disposable income, inadequate funding for social housing and profit driven developers has resulted in stark inequities in access to affordable, appropriate, and quality housing.

**5. How could governments work better with industry, community services and other organisations to improve housing outcomes for all Australians?**

Consistent with joined up approached in public health – government should take a housing in all policies approach to ensure that housing is considered in all policy portfolios (intersectoral action-see for example the Health in All Policies approach). In the context of the UN Housing2030 project, Martin and colleagues (2023) describe the importance of *“good housing policy governance deriving from clear strategic frameworks, mission-focused institutions, capable stakeholders, long-term leadership and commitment. They go on to suggest that this will require multi-level governance, based on long-term agreements. It is also open to monitoring and critique, strengthens the voice of marginalised groups, learns from mistakes and adapts when necessary.”* Policy experiences from other countries point to the value of an expansive approach to housing policy, and the role of dedicated housing agencies with statutory authority and coordinating functions (Martin et al., 2023).

From a health promotion perspective, engagement with industry is important however their role should be transparent and their participation in policy making processes should be limited. Those with lived experience should be given an opportunity to participate in decision-making based on co-production principles to address the long-term challenge of housing for all.

**6. How can governments and the private and community sectors, help to improve sustainable housing and better prepare housing for the effects of climate change?**

In 2020, it was estimated that up to 40% of renters were experiencing energy hardship due to both rapidly rising energy costs and a large stock of rental properties that are poor quality and energy-inefficient (AHURI, 2020). Given recent further increases in energy costs the percentage experiencing energy hardship is likely much higher now. Housing in remote areas of Australia, particularly the NT, is old, poorly constructed and often poorly maintained. This housing is becoming dangerously hot as the effects of climate change are felt. In remote SA, public housing is being built to an energy rating of 8 stars but in the NT must only reach 3 stars, lower than the national standard of at least 6 stars (Quilty and Jupurrurla, 2022).

A 2009 report by the UN Special Rapporteur on the right to adequate housing noted that climate change exacerbates existing vulnerabilities. A 2022 report by the UN Special Rapporteur on the right to adequate housing has highlighted the impacts of climate change, finding that housing itself makes a significant contribution to climate change and climate change is severely threatening the right to adequate housing (UN Special Rapporteur on the right to adequate housing, 2023).

**7. Is there anything else you would like to tell us?**

There is a need for greater research and intervention to address the reciprocal relationship between health and housing. Housing instability, suitability, security and affordability affects factors such as safety, social support and living practices which in turn affect health outcomes (VicHealth, 2011). For example, the Australian Healthy Housing Centre for Research Excellence (HHCRE) (2021) argues that unaffordable housing makes us sick, with poorer mental health, overcrowding for those in the community vulnerable to other health conditions, homes that are too hot or cold and which expose people to mould, toxins, and pathogens. Other evidence suggests that having accommodation that is too small, or building defects, results in negative implications for health (Oswald et al., 2023). Inability to keep sufficiently warm in winter impacts adversely on health. Australian rental homes are colder than is considered safe by the World Health Organization (Convery, 2022).

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