



Submission to the Department of Social
Services' National Housing and
Homelessness Plan Issues Paper



About Disability Advocacy NSW

Disability Advocacy (DA) has over 35 years of experience providing individual advocacy to persons with disabilities (PWD) of any age. The organisation services over two thirds of NSW, making it the largest individual disability advocacy organisation within NSW.

While DA has a presence in Sydney, it has a strong commitment to regional, rural, and remote (RRR) areas in NSW. With local disability advocates on the ground in Western Sydney, Armidale, Bathurst, Broken Hill, Ballina, the Blue Mountains, Coffs Harbour, Dubbo, Newcastle, the Central Coast, Port Macquarie, Tamworth, Gosford and Taree, DA has firsthand insights and observations of the lived experiences of PWD and their families across these areas.

DA's systemic advocacy draws on coalface information from clients, disability advocates, and the disability sector more broadly, to identify, and address emerging policy issues.

Contact

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Key Recommendations

Recommendation 1:

That persons with disabilities be included as a priority population in the NHHA and the associated National Housing and Homelessness Plan (the NHHP).

Recommendation 2:

That the priorities of the NHHP align with Australia's Disability Strategy, Outcome Area 2.

Recommendation 3:

That research be conducted, both nationally and across all States and Territories to:

- a) Determine the proportion of persons with disabilities who are homeless, including a breakdown of disability type.
- b) Look into the reasons why persons with disabilities experience homelessness.
- c) Examine the extent to which persons with disabilities are being adequately serviced by Specialist Homelessness Services (SHS) including an audit of accessible crisis centres, refuges, and hostels.
- d) Examine hospital discharge rates for persons with disabilities, including those in spinal care wards, to determine how many days people remain in hospital after being medically fit for discharge, and the reasons they cannot be discharged.
- e) Look into the development of temporary accommodation, with wraparound supports, specifically designed to allow people to exit hospital while looking for more permanent housing solutions.

Recommendation 4:

That the NHHP include strategies to increase the supply of Specialist Disability Accommodation (SDA) and Supported Independent Living (SIL) properties, particularly in rural, regional, and remote areas and that the federal government, states and territories work together to make the process of apply for SDA and SIL faster, and less administrative.

Recommendation 5:

That, as part of the NHHP, the Australian Government, States and territories universally commit to the minimum accessibility standards of the National Construction Code (The NCC) to ensure that all new homes are built to at least Silver Level Livable Design.



Recommendation 6:

Provide grants of emergency financial aid to support people who have disability and are homeless to access additional disability related supports and services, so they do not exhaust their National Disability Insurance Scheme or Aged Care funding.

Recommendation 7:

That, as part of the NHHP, the Australian government, states and territories commit to a gradual phasing out of existing models for residential aged care facilities, group homes and all other quasi-institutional accommodation facilities that do not conform with Australia's Disability Strategy and the United Nations Convention on the Rights of Persons with Disability (the UNCRPD).

Recommendation 8:

That the NSW government be supported to build 70,000 new social housing properties by 2053 (or 5000 new properties a year for the next 30 years) and that we aim to achieve the Organisation for Economic Co-operation and Development (OECD) target of social housing as representing at least 7% of all homes, both nationally, and within each state and territory.

Recommendation 9:

That all states and territories commit to building all new social housing to Livable Design Standards as standard, with guaranteed prescribed ratios of Silver, Gold, and Platinum level stock and prescribing these design standards (as a minimum) as part of any public private partnership (PPP) with the community housing sector.

Recommendation 10:

That all states and territories commit to a process of upgrading social housing stock to be upgraded, to the extent possible, in line with Livable Design Standards.

Recommendation 11:

Review existing anti-social behaviour policies across social housing in the context of disability, to ensure that persons with disability are not indirectly discriminated against.



Recommendation 12:

That research be conducted nationally and across all states and territories to examine the scope and nature of challenges experienced by persons with disabilities and their families in finding homes in the rental market that are fit-for-purpose.

Recommendation 13:

That National Cabinet efforts to strengthen renters' rights focus on securing enhanced rights for tenants with disability, including increasing the capacity for tenants to make disability related modifications to rental properties, that tenancy documentation be provided in a range of accessible formats, and that disability be an express factor in determining when a property is to be returned to a landlord after an order for termination has been made.

Recommendation 14:

That all Australian states and territories commit to the minimum accessibility standards as prescribed in the National Construction Code for all new home builds.

Recommendation 15:

That a clearer pathway for navigating NDIS and Aged Care funded housing modifications in the context of rental properties should be determined, and strategies for reducing 'red tape' associated with seeking these funding supports be investigated.



Introduction

There is no dignity when there is no choice. With social housing under severe pressure, and a dire shortage of affordable accessible homes [in the private market], many persons with disabilities are finding themselves stuck without a choice and forced to face the dim prospect of emergency accommodation or the threat of homelessness.i

'Beggars Can't be Choosers' – DANSW Report on the housing experience of Persons with disability in regional, remote, and rural NSW.

As the largest disability advocacy provider in NSW, with over 35 years of experience supporting Persons with disability across several regions of the State, DANSW appreciates the opportunity to contribute to the development of Australia's National Housing and Homelessness Plan (the NHHP). Between 2020 – 2023, DANSW has provided advocacy or referral support to 661 clients, across the state, on matters ranging from applications for social housing through to no ground evictions and strata disputes.

Research demonstrates that access to housing plays a major role in the health and wellbeing of persons with disabilities and that the availability of affordable and appropriate housing helps persons with disabilities to engage socially and economically in their communities.ⁱⁱ

Persons with disabilities represent a significant proportion of the Australian population and can present with complex housing needs. While there are a range of direct or indirect housing supports at local, state, and federal levels of government for people with disability, including older persons, there is no overall cohesion to ensure compliance with Australia's National Disability Strategy 2021-2031. Many supports fall short of providing persons with disabilities with the choice to live in community, where, and with whom, they chose to.

In NSW, over recent years, we have seen the divestment of responsibility for responding to the housing needs of persons with disabilities onto the National Disability Insurance Scheme (The NDIS) and Aged Care, with no apparent consideration of how effective these schemes really are in improving a home's overall amenity. Such a passive approach, combined with potential wait lists of 10+ years for social housing, a lack of accessible properties within the private rental market and ongoing cost barriers to buying a home, paints a grim housing picture for many of our clients.

The Productivity Commission's report on the NHHA last year expressly recognised the need for the next NHHA to align with Outcome 2 of the Strategy.ⁱⁱⁱ DANSW wants to see persons with disabilities recognised as a priority population under the NHHA, and supports the Productivity Commission's recommendation that the Australian, State and Territory Governments commission a Housing Targeted Action Plan under Australia's Disability Strategy to improve the availability of affordable and accessible housing for people with disability. We see a significant role for the NAHA and its associated Plan in driving the two policy priorities of Australia's Disability Strategy Outcome Area 2- Inclusive Homes and Communities:

1. Increase the availability of affordable housing and
2. Housing is accessible and persons with disabilities have choice and control about where they live, who they live with, and who comes into their home^{iv}

We also note that the development of the NHHP comes at an opportune time, coinciding with the release of the final report of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (DRC). The Commission specifically recommends that the Australian government should, in collaboration with state and territory governments, expressly identify persons with disabilities as a priority group in the NHHA and include their interests across the development of housing supply and affordability advice, data collection and reporting. The DRC also recommends the development of a National Housing and Homelessness Plan (NHHP), to allow the Australian Government, states, and territories to work together to identify people with disability, recognise their needs, circumstances, and diversity, with goals to increase intensive homelessness services for persons with disabilities and phase out disability group homes within the next 15 years.

Our submission will speak to the on-the-ground experiences of our advocates and recent research we have conducted to understand the housing challenges for persons with disabilities across remote, rural, and regional NSW. We will focus particularly on homelessness, social housing, and the private rental market.

The prevalence of disability and the housing needs of the disability community

1 in 6, or about 4.4 million people, across Australia have disability, with nearly one-third (32%) having severe or profound disabilities which affect their capacity to perform daily self-care, mobility, or communication activities.^v Mr. Edward Santow, former Human Rights Commissioner has previously observed that '*disability is an inherent part of the human condition*', and it is safe to assume that over the course of a person's lifetime, they will either experience some form of disability themselves, or will have an intimate connection with someone who identifies as having disability.

At the same time, the rates of disability are rising across Australia (from about 4.0 million in 2009) and are expected to continue to rise as our population ages. On 30 June 2020, there were an estimated 4.2 million older Australians (aged 65 and over) making up 16% of the total Australian population.^{vi} By 2066, it is projected that older people in Australia will make up between 21% and 23% of the total population.^{vii} While we are ageing better, we are also living longer lives – and the prevalence of disability disproportionately increases with age.^{viii}

While the needs of persons with disabilities as a cohort are multifaceted, and can be impacted by various intersectional factors, we know that there are some common desires for housing across the disability community. These include:

- **Security of tenure** – the stresses of relocation are amplified for people with disability. Persons with disabilities want to be able to stay in properties for as long as

they can, in the communities they are connected to. Older persons with disabilities are keen to age in place for as long as possible.^{ix}

- **Affordability** – Persons with disability need affordable homes to live in. Data from the Australian Institute of Health and Welfare (AIHW) indicates that 38% of households with a person with disability in Australia have a low level of household weekly income versus 18% of households without a disability.^x The same data states that people aged 15-65 with disability are twice as likely as those without disability to be living in financial stress.^{xi}
- **Accessibility** – many persons with disabilities require housing that is either built to purpose or can be easily modified to suit their specific accessibility requirements. This may include properties that are built with specific design features, for example, homes that can accommodate assistive technology like wheelchairs, or properties designed to be particularly robust to support those with psychosocial disability.
- **Choice** – through our front-line work, we know that persons with disabilities have significantly reduced housing options, compared to those without disability. Persons with disabilities can search for months, or even years, to try to find suitable homes to rent or buy.^{xii} The lack of viable options can result in persons with disabilities being forced into segregated housing such as residential aged care or group homes, when they would prefer to live independently.
- **Inclusion** – where possible, persons with disabilities want to live in the communities that matter to them, alongside their friends and family. They want housing that allows them to make life decisions and choices on an equitable basis with everyone else, for example, to have a relationship, or raise a family.

Disability can impact a person's access to housing in several ways. A person with disability may experience discrimination from landlords or real estate agents when applying for properties or may experience barriers in navigating the process of finding a suitable home, for instance, they might be physically unable to view potential properties, or complete a rental application form unassisted.

In our report, we have likened the experience of accessing suitable housing for Persons with disability as being like '*finding a needle in a haystack*'. The following case studies are drawn directly from DANSW's work and highlight how complex it can be to find housing that is accessible, stable, and secure, as a person with disability.

Case study 1:

Brent has complex mental health issues and moved from his community housing property to another region on account of personal safety issues. He didn't advise his housing provider that he was leaving. He's tried for several weeks to arrange alternative accommodation and drained his NDIS funding on short term Specialist Disability Accommodation. Brent is now homeless, with no access to the disability supports he need.*

Case Study 2:

Jenny has an intellectual disability. She lives in private rental accommodation and is under a guardianship order. Jenny has received a no-grounds 90-day termination notice. She is at risk of homelessness and has an upcoming Tribunal hearing. Jenny may be able to access Specialist Disability Accommodation, but there is no guarantee of funding through her NDIS Plan. She's on the priority list for social housing but is not engaging with local disability support services to put a plan in place.*

Homelessness in the context of disability

Homelessness across the disability community is often hidden, and those with disability who experience homelessness are often statistically defined in the catch all category of 'complex needs'.

There is no statistical breakdown, at federal, state or territory level, of how many persons with disabilities meet the criteria for homelessness, but we do know that 8.6% of all people who engage with Specialist Homelessness Services (SHS) have some form of disability, and that 30% of those have severe or profound disability.^{xiii} There is no data on how effective homelessness services like emergency accommodation, transitional housing, and crisis centres, are in meeting the needs of persons with disabilities who are either currently experiencing, or are at imminent risk of, homelessness.

What we do know, through our advocacy work and research, is that homelessness can manifest in a range of ways for people with disability. Persons with disability may be rough sleepers, couch surf, or live in boarding houses or other forms of temporary accommodation and may experience extended periods of homelessness.

When I was first diagnosed, I was homeless for the first four years and living on people's couches... the property was not accessible, and I could not even use the shower, so I only showered once every three months when it became absolutely necessary... I finally (with the assistance of a housing subsidy) got a private rental approximately four years ago. It was more suitable than couch surfing, but I still could not access the shower. I was there about a year and a half and was evicted as the owner was selling.^{xiv}

Persons with disabilities may also experience homelessness in unconventional ways. In the report 'Beggars Can't be Choosers' we highlighted that it is not uncommon for people to experience illness or an accident and be admitted to hospital, only to be unable to return home either because the property is no longer available or is no longer suitable for their needs. We are aware that people have had to wait 6 months or more to be discharged from spinal care wards, for instance, because they require a wheelchair accessible property.

Sally, a hospital worker, described instances where persons with disabilities are unable to return to their homes because their health worsens, and their homes become unsuitable for their health needs. Hospitals end up becoming 'holding bays', while waiting on finding accommodation for people with disability. Sally reported that the longest stay they had was 14 months.^{xv}*

Case study 3:

Mary has several disabilities including an acquired brain injury and has been living in SDA for some time, Mary has a fall and ends up being hospitalised. Her SDA provider is reluctant to take her back as a resident after discharge. As a result, Mary remains hospitalised for several weeks, post treatment until alternative accommodation can be secured. There is a marked decline in Mary's health during this period and she is unable to access her NDIS supports and services while a patient.*

A person who cannot be discharged from hospital because they have no access to suitable alternatives meets the statistical criteria for homelessness, since they have no control of, or space for, social relations while they remain in hospital.^{xvi}

Someone with disability who is forced to live in an institutional setting, like an aged care home, assisted boarding house or group home, might also meet the definition of homelessness if that person with disability does not willingly transition into this accommodation, and the accommodation fails to provide them with sufficient autonomy and self-determination to be able to realise their full capabilities, for instance, the capacity to build a family and form (or sustain) intimate relationships. We know of situations where transition into a group home has broken up family units, while couples in nursing homes are routinely split up into separate rooms.

We note that an estimated that 5% of all residential aged care beds across Australia are occupied by a young person with disability, simply because they have no other viable option.^{xvii}

A disability-centred approach to homelessness

The National Housing and Homelessness Plan (NHHP) could be used to provide enhanced services to support persons with disabilities who may be experiencing homelessness both Nationally, and at State and Territory levels, but we need to see persons with disabilities as a priority cohort in the NHHA, in the first instance, to ensure that the unique needs of people with disability, who are either homeless, or at risk of being so are covered under the Plan.

If this were realised, our first recommendation would be that the Australian Government, States and Territories invest in researching into the extent to which persons with disabilities are represented in homelessness figures, how disability impacts the presentation of homelessness, and the extent to which homelessness services, like crisis centres, refuges and short-term accommodation services can currently respond effectively to the needs of people with disability.

Leading from this scoping, we would want to see a range of targeted priorities, determined in co-design with the disability community, advocates, domestic violence services, disability service providers and the Specialist Homelessness Sector, to address challenges identified.

Priorities that we can already identify, based on existing data, combined with our observations, are firstly, that the Australian Government, States, and Territories need to support increased supply across the Supported Independent Living (SIL) and Specialist Disability Accommodation (SDA) market, particularly in rural, remote, and regional areas,



and that existing models for group homes and other institutional settings need to be phased out, with a greater emphasis on alignment with the provisions of the UN Convention on the Rights of Persons with Disability (Article 19).^{xviii}

Why should I be made to share with two other random people who I've never met – who I don't get to choose who they are. What other situation – except for being disabled – would a person find themselves in this predicament?

■■■■■ NDIS Participant, Western Sydney, talking about SDA in 'Beggars Can't Be Choosers'

The 'holding bay' situation in hospitals also needs to be addressed. We need low-or no-cost short to medium term accommodation with wrap around supports to help those leaving hospital access the support systems and services they need to reintegrate back into community. At the same time, we need to see a commitment to increasing supply of homes that are both affordable and built to universal design standards^{xix} to give real choice and control to persons with disabilities to rent and buy homes in their communities.

We need to ensure that Specialist Homelessness Support (SHS) sectors in all States and Territories are well-funded and sustainable in the long term. There also needs to be specific investment in SHS services with the specialist skills and expertise to provide wrap-around support for those with disability, with the understanding that there are many intersecting factors that need to be addressed to support those with disability to both access and maintain, a place to call home.

Lastly, persons with disabilities who experience homelessness may lose access to the daily supports and services they need – for example, a person with disability who leaves an abusive partner, might lose the informal caring support that individual might otherwise provide. We need to ensure that persons with disabilities can continue to receive disability related supports and services and that they do not drain their NDIS or Aged Care funding while in a temporary crisis. To prevent this, persons with disabilities should be able to quickly access emergency grants of financial aid to support them to access any supports and services they require due to being homeless.

Social housing

2 in 5 of families living in social housing across Australia have a disability (39%). Social housing can be a desirable option for people with disability, since it offers capped rent as a proportion of household income, as well as greater security of tenure. It is also our experience that it is disproportionately easier to get disability related modifications to social housing properties. Australian evidence indicates that access to social housing substantially reduces tenants' risk of homelessness.^{xx}

Having said this, social housing is difficult to obtain. The number of social housing dwellings nationally have barely increased over the past 20 years, and only constitute 4% of all housing nationally, which is well below the Organisation for Economic Co-ordination and Development (OECD) average of 7%.^{xxi} As of 30 June 2022, in NSW, there were 51,031 households on the general housing wait list, and 6519 households on the priority list.^{xxii}



Current wait-times show that it can take more than 10 years to access social housing on the general wait list in high demand areas.^{xxiii}

At the same time, while the NSW housing provider, Land and Housing Corporation (LHC) has an obligation to provide housing that is fit for purpose, and a commitment to building new stock to Silver Level Livable Design standards, the bulk of its portfolio is legacy stock from the 1950's and was not constructed with accessibility as a consideration. Such properties are, usually unsuitable for people with physical accessibility needs and challenging to retrofit.

Substantially increase social housing – and build the right kind of properties.

We support increases to social housing supply to meet current and projected supply demands and align us both nationally and at a state level with the OECD 7% benchmark. Research has shown that, in NSW, this amounts to an additional 70,000 dwellings (or 5000 new properties a year for the next 30 years).^{xxiv}

But it is important that we build the right kind of properties. We need to see the expansion of design types for new social housing stock to include not only Silver Level Livable Design (which is often viewed as visitable, rather than liveable, as it does not provide for a guaranteed ground floor bedroom) to include a proportion of stock built to Gold Livable Housing Design and even Platinum level.^{xxv}

Existing stock needs to be upgraded, to the extent possible, to increase accessibility, and we need to see less reliance on tenants to fund their own disability modifications to social housing stock via the NDIS or My Aged Care, noting that not everyone with disability is eligible for these federal schemes.

Re-envision social housing to more than just a home.

We also need to acknowledge the significant proportion of persons with disabilities who live in social housing, and look at how to best support these people, with an appreciation that for many, social housing is a last resort before homelessness.

We know that a disproportionate number of social housing tenants who find themselves facing eviction, particularly those who present with so called 'anti-social behaviours', identify as having a disability, and that their success in retaining their housing is often dependent on linking up with external supports and services.

A holistic approach, with a focus on sustaining tenancies, finding the right property for the right tenant, and the provision of inbuilt wrap around supports, could have great benefit for tenants with disability, in particular, those with cognitive and psychosocial disabilities.

'Anti-social behaviour' policies and processes should be reviewed in the context of tenants with disabilities, and a long-term commitment to appropriate funding of advocacy services, to provide information, advice, and advocacy to social housing tenants.



Private rental market

Most people who have disability across Australia live in the private housing market.^{xxvi} Close to one-third (29% or 1.2 million) of persons with disabilities rent their homes and the bulk of those rent in the private market.^{xxvii xxviii} Persons with disabilities who rent experience unique challenges around accessing housing that is secure, affordable, and accessible to live in.

We know from our work that people with physical disability struggle to find rental properties that are accessible and that many end up in properties that are not fit for purpose – compromising on their safety, comfort, and amenity - simply due to a lack of options.

There are currently no formal mechanisms to clearly examine the scope and nature of challenges experienced by persons with disabilities and their families in finding homes in the rental market that are fit-for-purpose, making it extremely hard to motivate policy-makers to address these problems.

Anecdotally we know that persons with disabilities can experience discrimination on applying for rental properties, either directly, or indirectly, particularly if they cannot work, and rely on the Disability Support Pension (the DSP) as their primary form of income. It is currently estimated that only 0.2% of the private rental market is affordable for people receiving DSP.^{xxix}, which greatly reduces the scope of available properties, while also increasing competition for the few that are affordable. It also means that people on the Disability Support Pension (DSP) are more likely to end up in marginal housing like boarding houses or leasing from a head tenant in a share house –and these housing options offer considerably less rights and protections for occupants.

Another challenge for persons with disabilities who are looking to rent in the private market is the lack of housing stock that is suitable for people with mobility difficulties. This is particularly problematic for tenants who may not be able to self-fund modifications or gain the consent of their landlord to modify the property – noting that NSW rental laws require tenants to seek consent from their landlords for all but the most minor modifications to their properties and that landlords can refuse more substantive modifications without the need to provide any reason for doing so.^{xxx} People with physical disabilities can end up in properties that are not fit for purpose – compromising on their safety, comfort, and amenity - simply due to a lack of options. We know of tenants who routinely crawl up staircases, wash using a basin, and sleep on a couch in the living room, because their homes don't provide them with the same levels of amenity as those who don't have disability.

'Houses we [people with disability] have to rent have to have certain requirements, wider spaces, bigger bathrooms etc, and so we end up paying higher rents when we can find a place, and it's important we keep that rental for as long as we can.'

██████████ a person with physical disability on DSP, quoted in 'Beggars can't be Choosers'.^{xxxi}

A major challenge in our work trying to address these issues, is that it is not currently possible to quantify number of homes that would meet universal design standards across the Australian housing market, or to know whether these homes are being occupied by those



who would benefit from them the most, or whether they are being underutilised by those without disability.

Over the past two years, DANSW alongside disability peak bodies, and other community sector organisations have worked to push for all Australian states and territories to comply with recent updates to the National Construction Code (the NCC) which require all new homes to be built to at least Silver Level Livable Design, as part of the Building Better Homes Campaign.^{xxxii} Victoria, Tasmania, the ACT, South Australia, and Queensland have all committed to the changes, but NSW and Western Australia have specifically opted out of this requirement.

The NHHA as a mechanism for consistency

Having persons with disabilities recognised as a priority group for the purposes of the NHHA, could increase pressure on states and territories to collaborate and work towards consistent approaches to the challenges we have highlighted for tenants with disability in the private rental market.

National Cabinet efforts to strengthen renters' rights across the country, in addition to focusing on ending no grounds evictions and limiting rent increases, should also focus on securing enhanced rights for tenants with disability, including increasing the capacity for tenants to make disability related modifications to rental properties, requiring tenancy documentation to be provided in a range of accessible formats, and expressly providing that disability be a consideration in determining vacation dates after a lease has been terminated.

A clearer pathway for navigating NDIS and Aged Care funded housing modifications in the context of rental properties should be determined, and the 'red tape' associated with seeking these funding supports should be minimised.

We also need to see an increase in the availability of accessible housing options across the rental market – the Australian Government, States and Territories need to provide incentives for investors to build-to-rent homes that comply with at least Silver Level Accessibility.

Concluding comments

As we have previously stated, 1 in 6, or about 4.4 million people, across Australia have disability, with nearly one-third (32%) having severe or profound disabilities which affect their capacity to perform daily self-care, mobility, or communication activities.^{xxxiii} Despite the high prevalence of persons with disabilities across our communities, there has been little collective Government action towards ensuring that housing is accessible and persons with disabilities have choice and control about where they live, who they live with, and who comes into their home.^{xxxiv} The fact that young persons with disabilities have to live in nursing homes, or that persons with disabilities are required to live in group homes with people they can't choose are unacceptable in the context of a modern rights-based approach to disability - we need the collective commitment of the Australian Government, in collaboration with states, territories and non-government organisations to develop short, medium and long term reforms to meet our responsibilities under Australia's Disability



Strategy Outcome Area 2- Inclusive Homes and Communities. We agree that tackling these issues can't be done in silos^{xxxv}, and that a national and coordinated approach is needed. Including persons with disabilities as a priority cohort in the National Housing and Homelessness Plan is the first step in ensuring that their collective interests are elevated as a matter of national priority.

ⁱ Baylois, C., *Beggars Can't Be Choosers: The Impact of the Housing Crisis*, Disability Advocacy 'Aussie Battler' Report Series, 2022 < [637d8206f7ec9c46b427ebb8_Disability Advocacy Housing Beggars cant be choosers report.pdf \(website-files.com\)](https://www.disabilityadvocacy.org.au/files/637d8206f7ec9c46b427ebb8_Disability_Advocacy_Housing_Beggars_cant_be_choosers_report.pdf)> accessed 17 October 2023.

ⁱⁱ Australian Institute of Health and Welfare (AIHW), *People with Disability in Australia – Housing* <[People with Disability in Australia, Housing - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/people-with-disability-in-australia/housing)> accessed 17 October 2023.

ⁱⁱⁱ Australian Government, Productivity Commission, *In need of repair: The National Housing and Homelessness Agreement*, study report, August 2022 <[housing-homelessness-overview.docx \(live.com\)](https://www.productivity.gov.au/in-need-of-repair-the-national-housing-and-homelessness-agreement)> accessed 18 October 2023.

^{iv} Australian Government, Department of Social Services, *Australia's Disability Strategy -2021-2031* <[1781-australias-disability.docx \(live.com\)](https://www.dss.gov.au/australias-disability-strategy)> accessed 18 October 2023.

^v AIHW, *People with Disability in Australia*, op cit., accessed 18 October 2023.

^{vi} AIHW, *Older Australians*, web report, last updated 28 June 2023 <[Older Australians, Demographic profile - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/older-australians)> accessed 18 October 2023.

^{vii} Ibid.

^{viii} Ibid.

^{ix} Australian Government, Royal Commission into Aged Care Quality and Safety, *Final Report – Care Dignity and Respect, Vol 1, Summary and Recommendations*, 2021, at p. 24 <[Royal Commission into Aged Care Quality and Safety Final Report - Care, Dignity and Respect: Volume 1](https://www.rcgsc.gov.au/aged-care-quality-and-safety-final-report)> accessed 18 October 2023.

^x AIHW, *People with disability in Australia – Income and Finance*, [People with Disability in Australia, Income and finance - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/people-with-disability-in-australia/income-and-finance) accessed 18 October 2023.

^{xi} Ibid.

^{xii} Baylois, C., op cit., Physical Disability Council of NSW, *Submission to the Discussion Paper on Housing Strategy*, March 2022 < [Submission-to-the-Productivity-Commission-National-Housing-and-Homelessness-Agreement.pdf \(pdcnsw.org.au\)](https://www.pdcnsw.org.au/submission-to-the-productivity-commission-national-housing-and-homelessness-agreement.pdf)> accessed 18 October 2023.

^{xiii} AIHW, *People with Disability in Australia – Housing*, web report, last updated 5 July 2022 < [People with disability in Australia, Housing - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/people-with-disability-in-australia/housing)> accessed 18 October 2023.

^{xiv} Physical Disability Council of NSW, op cit.

^{xv} Baylois, C., op cit.

^{xvi} Australian Bureau of Statistics, *Census of Population and Housing: Estimating Homelessness methodology*, released 22 March 2023 < [Estimating Homelessness: Census, 2021 | Australian Bureau of Statistics \(abs.gov.au\)](https://www.abs.gov.au/census-of-population-and-housing-estimating-homelessness-methodology)> accessed 18 October 2023.

^{xvii} Young People in Nursing Homes National Alliance, *FAQs* < [FAQs | Young People in Nursing Homes \(ypinh.org.au\)](https://www.ypinh.org.au/faqs)> accessed 18 October 2023.

^{xviii} United Nations, *Convention on the Rights of Persons with Disabilities (UNCPRD), Article 19* < [Article 19 - Living independently and being included in the community | Division for Inclusive Social Development \(DISD\)](https://www.un.org/development/desa/inclusion/en/article/19)> accessed 18 October 2023.

^{xix} See for example, the three design levels provided by Livable Housing Australia < [livablehousingaustralia.org.au](https://www.livablehousingaustralia.org.au)> accessed 18 October 2023.

^{xx} Infrastructure Victoria found that social housing tends to be effective at reducing homelessness. Only 7 per cent of residents placed in social housing subsequently become homeless, compared to 20 per cent of similar renters in the private market – referenced in Coates, B., *A place to call home: its*

time for a Social Housing Future Fund, Grattan Institute, blog post, 19 November 2021 < [A place to call home: it's time for a Social Housing Future Fund - Grattan Institute](#)> accessed 18 October 2023.

xxi Ibid.

xxii NSW Government, Department of Family and Community Services, *Expected Waiting Times* <[Expected waiting times | Family & Community Services \(nsw.gov.au\)](#)> accessed 18 October 2023.

xxiii Ibid.

xxiv National Council of Social Services (NCOSS), *Aftershock: Addressing the Economic and Social Costs of the Pandemic and Natural Disasters*, Report 3 – Housing Security, October 2022 <[IE Aftershock Housing V5b SINGLES.pdf \(ncoss.org.au\)](#)> at p29; Coates, B., op. cit.

xxv Livable Housing Australia, op cit.

xxvi This has been estimated as 99% of people with disabilities under the age of 65, and 91% of people aged 65 years and older, AIHW, *People with Disability in Australia – Type of Housing* <[People with disability in Australia, Type of housing - Australian Institute of Health and Welfare \(aihw.gov.au\)](#)> accessed 18 October 2023.

xxvii AIHW, *People with Disabilities in Australia – Living Arrangements*, last updated 5 July 2022, <[People with disability in Australia, Living arrangements - Australian Institute of Health and Welfare \(aihw.gov.au\)](#)> accessed 18 October 2023.

xxviii Ibid.

xxix Anglicare Australia, *Rental Affordability Snapshot – National Report 2023, 14th ed.* < [Rental-Affordability-Snapshot-National-Report.pdf \(anglicare.asn.au\)](#)> accessed 18 October 2023, p. 6.

xxx *Residential Tenancies Act 2010 (NSW)*, s. 66 < [Residential Tenancies Act 2010 No 42 - NSW Legislation](#)> accessed 18 October 2023.

xxxi Baylous, C., op cit.

xxxii See here Silver Level Livable Housing Design, Livable Housing Australia, op. cit.

xxxiii See here the campaign website - [Building Better Homes](#).

xxxiv Australian Government, Department of Social Services, *Australia's Disability Strategy 2021-2031*, op. cit.

xxxv Australian Government, Department of Social Services, *National Housing and Homelessness Plan Issues Paper, 2023* < [National Housing and Homelessness Plan Issues Paper \(dss.gov.au\)](#)> accessed 18 October 2023.