

National Housing and Homelessness Plan: Submission to consultation

BACKGROUND

Homelessness NSW welcomes this opportunity to provide input to the development of the National Housing and Homelessness Plan (The Plan). Homelessness NSW is a not-for-profit peak agency that exists to build the capability of people and the capacity of systems to end homelessness in NSW. We have a vision for, and commitment to, a future where everyone has a safe home and the support to keep it. Our 200+ members include specialist homelessness services, people with lived experience, allied organisations and services working to end homelessness. We work with a broad network of partners to understand the drivers of homelessness, advocate for solutions, build skills and knowledge, and scale innovation.

At Homelessness NSW we believe that homelessness is solvable – there is a strong evidence base that demonstrates how this can be achieved. Despite this, we continue to have a system that contributes to and entrenches people in homelessness. The Plan presents an opportunity for coordinated, strategic efforts towards ending homelessness and a framework that strengthens accountability for outcomes.

In the following submission we respond particularly to the following focus areas (as per the Issues Paper):

- Homelessness;
- Homelessness services; and
- Social housing.

We set out evidence and recommendations to guide the development of The Plan in relation to its:

- Overall vision and scope;
- Key principles, and examples of the types of levers that can enact these principles;

- Overarching aims, and examples of the population-level metrics that can be used to measure progress towards achieving these aims.

Our submission builds on our recent development of a systems change framework¹ which advocates for a whole-of-system approach to making homelessness:

- **Rare:** Prevent homelessness by addressing the drivers of inequality and poverty;
- **Brief:** Ensure quick access to support and safe accommodation, so that every person who experiences homeless has an immediate pathway to a home; and
- **Non-recurring:** Increase the availability of social housing, affordable private rentals and health and human service support.

This systems change approach recognises that there are many structural factors that contribute to homelessness, including inadequate affordable housing, insufficient social support systems and systemic inequalities such as poverty, unemployment, and discrimination. These problems interact with one another, creating a steady stream of people becoming homeless and for many, a cycle of homelessness that is challenging to break. The interconnectedness of these contributing factors means that actions in one domain can have ripple effects and unintended consequences. Therefore, preventing and responding to homelessness requires an integrated policy approach at the national level and a coordinated effort involving multiple stakeholders, including lived experts, government agencies, not-for-profit organisations, the private sector and community members.

Our recommendations have been informed by engagement with more than 650 people during our systems change work; targeted consultations with more than 40 key stakeholders (including people with lived experience, members and staff) on priorities for The Plan; and a literature and evidence review. We recommend a plan that:

1. Is founded on the premise of housing as a human right;
2. Addresses the structural and systemic drivers of homelessness;
3. Commits to the principles of, and sets out specific levers for action to prioritise:
 - a. Lived experience at the heart of change;
 - b. Evidence-based policy and practice;
 - c. Flexible systems and localised solutions;

- d. Addressing systemic discrimination;
 - e. Connections to communities and social inclusion;
 - f. Person-centred systems and services;
 - g. Cultural safety and self-determination;
 - h. Trauma-informed and trauma-preventative systems and services; and
 - i. Preventing and responding to climate risks.
4. Sets out clear, measurable targets to assess progress in relation to making homelessness rare, brief and non-recurring;
 5. Ensures strong governance to drive, advise on, and track Plan implementation, including an independent, expert Advisory Council on Homelessness.

If you wish to discuss this submission further, please contact [REDACTED]

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Thank you for your consideration.

Yours sincerely,

[REDACTED]

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Homelessness NSW: Submission to inform the National Housing and Homelessness Plan

A national strategic approach is needed that sets out a path to improved access to safe and affordable housing and strengthens health and human services systems at national, state and local levels. We advocate for a National Plan that prioritises poverty alleviation (in all its forms) as the foundation for reforms to the housing and homelessness system.

SCOPE

The National Housing and Homelessness Plan should be premised on the assumption of housing as a human right. As a signatory to the Universal Declaration of Human Rights and various conventions including the International Covenant on Economic, Social and Cultural Rights, Australia has committed itself to protecting a person's right to an adequate standard of living, freedom from discrimination and social security.² The Plan must set out steps and measures for actioning Australia's human rights commitments.

The scope of The Plan needs to be broad and cover not only housing supply and demand factors, but also structural and systemic underpinnings that drive homelessness.

Figure 1 below is an attempt to illustrate the scope The Plan should have:

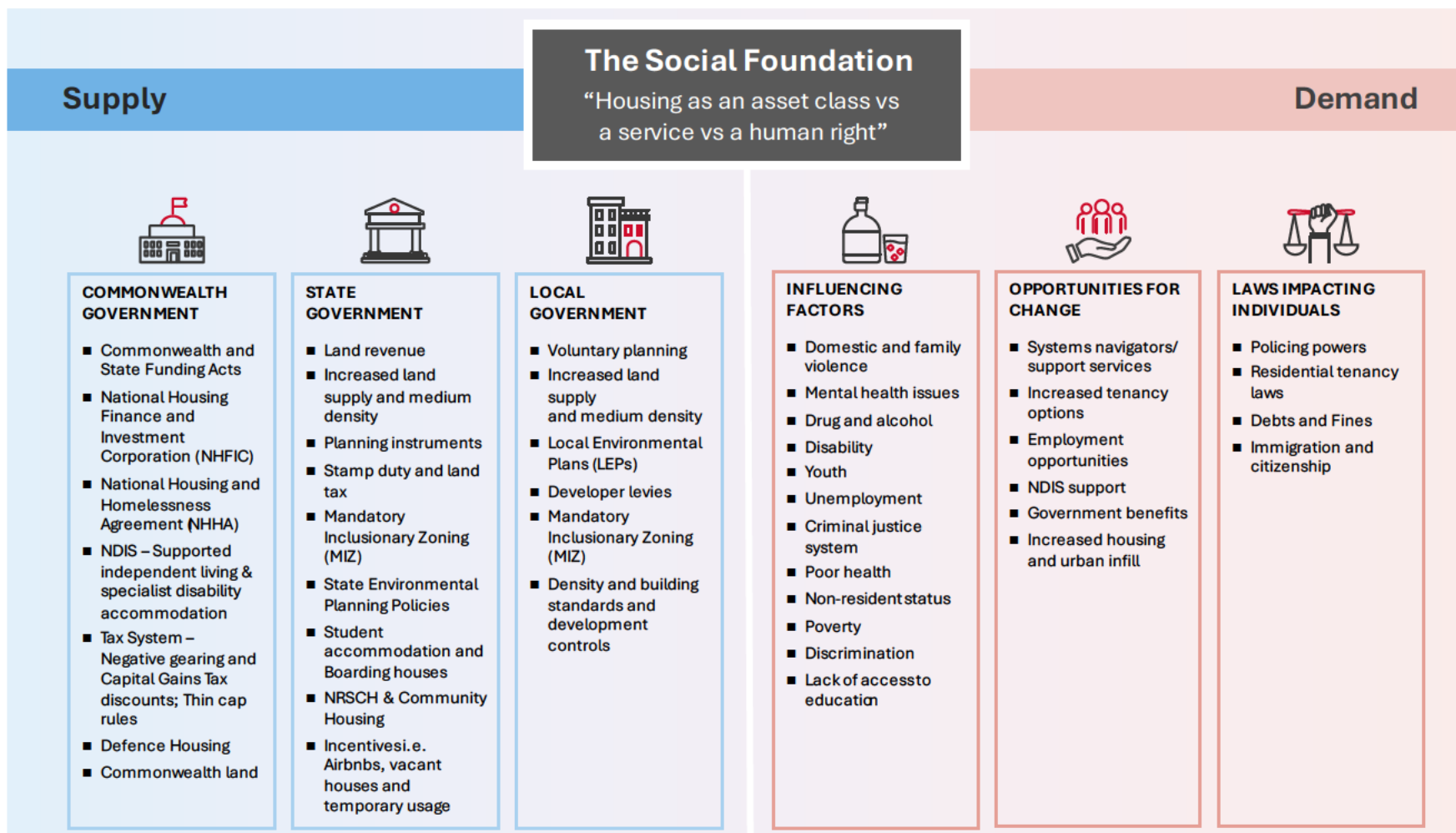


Figure 1: Overview of policy, legal and social scope of The Plan

The Plan should set out how to coordinate, design, resource and evaluate *all* of the sectors that relate to the drivers of homelessness. The Plan should set out strategic roles in relation to policy, planning, legislation, resourcing and service delivery in areas such as:

- Health
- Education
- Social security
- Justice
- Children and young people
- Disability
- Aboriginal and Torres Strait Islander peoples
- Domestic and family violence
- Employment
- Ageing and aged care
- Veterans' support

The Plan needs to articulate clear mechanisms for coordination across national, state and local governments; across agencies within each level of government; and between government and non-government partners. No single organisation or sector can make substantial changes to homelessness across NSW. The challenges of homelessness are broad, complex and dynamic. They include the explicit challenges around housing affordability and supply, family and domestic violence, as well as deeper structural issues including poverty, unemployment, racism and social inequality. While ambitious, such a broad-reaching coordinated approach is essential for The Plan to have real impact.

KEY PRINCIPLES AND LEVERS FOR ACTION

Lived experience at the heart of change

Lived experience is crucial to informing relevant and effective health and human services.^{3,4,5} In the area of homelessness there has, as yet, been little recognition of the value of lived experience of homelessness to research, policy and practice and, as such, we are missing valuable opportunities for impactful and ethical homelessness and housing strategies.⁶ As one person with lived experience said during our consultations: *“There are about 122,000 people who are homeless in Australia, so there are 122,000 experts out there”*.

For comparison purposes, The National Mental Health and Suicide Prevention Plan refers to the importance of lived experience in informing policy and services as well as the development of a lived experience workforce.⁷ Australia's Disability Strategy is accompanied by an Engagement Plan that sets out how people will be involved in the implementation of the strategy.⁸

**Recommended levers for action:**

- The development of a lived experience workforce: Training, development and resources for organisations to employ people with lived experience in designated roles such as peer workers, service leaders and policymakers
- Ongoing lived experience input to The Plan’s design, implementation, monitoring and governance
- A rights-based approach to housing, tenancy and service provision that facilitates choice, control, complaints mechanisms for individuals and families across the spectrum of homelessness and housing

Evidence-based policy and practice

There is a substantial evidence base demonstrating the contributing factors that shape experiences of homelessness in Australia and the policies, strategies and programs that can have the biggest impacts on reducing homelessness.⁹ Evidence-based policymaking is crucial to effective and impactful systems, which include a cycle of research and evaluation to feed back into the evidence base. However, the definition of what constitutes evidence and how it will be used must be transparent, rigorous and consider the following:

- Clarity on what constitutes ‘evidence’ and its application to specific local contexts and groups of people (ie. not assume that a particular ‘evidence-based’ model will fit for all people in all contexts);
- Recognition that there is evidence missing and there is a need to grow the evidence base, particularly in relation to small-scale, localised interventions where there have been no resources for research or evaluation; and

We should not wait for new evidence – while we commit to measuring the impact of existing and new approaches there is sufficient evidence for action now.

**Recommended levers for action:**

- A strategic, action-oriented national research agenda
- Transparent, current and relevant evidence base for all strategic goals and actions contained in The Plan
- Support to service providers to evaluate and continuously improve services – evaluation based on service improvement and learning, not just as part of key performance indicator measurement
- An approach to measuring ‘outcomes’ that recognises diversity in outcomes for individuals based on complex circumstances

Flexible systems and localised solutions

While there is a need for a consistent and transparent approach to ending homelessness, this does not equate to a ‘one-size-fits-all’ approach. In addition to being person-centred, homelessness and housing services must be able to adapt to meet local contexts. For example, the needs and assets of rural and remote communities are likely different to those in urban settings. There are particular barriers to crisis accommodation in many rural areas due to lack of supply and challenges in maintaining safety and confidentiality in small communities for victim survivors of domestic violence.¹⁰ This means that different approaches are needed in terms of housing design and service provision (eg. different transport needs). Flexible design of funding, services and housing must also consider diversity in terms of, for example, gender, culture, age, health, personal preferences, availability of resources and location.

**Recommended levers for action:**

- Investment of resources in regional, rural and remote communities to increase options for safe and accessible crisis, supported and long-term accommodation
- Investment in a diverse range of crisis, transitional and long-term housing options and support services
- Funding models that facilitate localisation and adaptation of services

Addressing systemic discrimination

- Inequitable experiences of homelessness, and broader health and wellbeing outcomes, reflect structural discrimination. The Plan needs to articulate a national approach to ending homelessness that acknowledges and takes action on discrimination.¹¹ There are strong correlations between a range of inequalities and people's experiences of homelessness that highlight the structural issues that drive homelessness.¹² Examples of intersecting inequalities that reflect systemic discrimination include:
- Aboriginal and Torres Strait Islander people make up 3.8% of the population but 20% of the homeless population nationally.¹³
- People with disabilities experience particular risks associated with insecure housing and homelessness due to factors such as lower incomes, higher rates of unemployment, inaccessibility of housing and support, and discrimination in multiple settings including the private rental market.^{14, 15, 16}
- Young people who are sexuality diverse and/or trans and gender diverse face significantly higher rates of homelessness than cis-heterosexual young people.¹⁷ This can be associated with exclusion from families and communities more broadly, as well as lack of services that are accepting and appropriate.¹⁸
- Domestic and family violence is the main reason that women and children leave their homes.¹⁹
- People with chronic health issues, including mental illness, experience disproportionately high rates of homelessness.²⁰ People experiencing homelessness face many barriers to healthcare access, including cost of services.²¹ Homelessness and housing interventions should be recovery-oriented and support people to live in their communities.²²
- Young people (aged 12 to 24) constituted nearly one quarter of all homelessness people counted during the 2021 census.²³ In the most recent Mission Australia Youth Survey almost one in ten young people reported concerns about housing instability.²⁴
- Non-residents are often excluded from homelessness and housing support services, but are at particular risk of homelessness due to income constraints, their inability to access health care and social isolation.²⁵
- Australia's homeless population is getting older. Groups such as older women are being impacted by socioeconomic factors such as lower rates of full-time employment, pay and superannuation than their male counterparts.²⁶

- More than 50% of prisoners are expected to be homeless upon release.^{27, 28}
- Veterans experience disproportionately high rates of homelessness associated with greater risks of psychological distress, relationship breakdowns and unemployment.²⁹

**Recommended levers for action:**

Alignment with key policies including:

- Closing the Gap.³⁰
- Australia's Disability Strategy³¹ and National Disability Insurance Scheme.
- The National Plan to end Violence against Women and Children.³²
- The National Mental Health and Suicide Prevention Plan.³³
- National Children's Mental Health and Wellbeing Strategy³⁴; National Action Plan for the Health of Children and Young People³⁵; and Safe and Supported: The National Framework for Protecting Australia's Children 2021 – 2031.³⁶
- Veteran Transition Strategy.³⁷
- Targeted investment in housing and homelessness models for young people
- A dedicated First Nations National Housing and Homelessness Plan
- Collaboration with the media sector develop guidelines for reporting and communicating about homelessness in order to minimise stereotyping and discrimination
- Action plan for supporting better health and housing outcomes for non-residents

Connections to communities and social inclusion

Housing policy, particularly related to social housing, and crisis, transitional and supported accommodation, must consider the social and wellbeing implications associated with the location and type of accommodation. Too often people are offered accommodation located away from their social networks and even away from their employment and education. People need to be housed where they have economic, social, familial and cultural connections. This leads to better long-term health and wellbeing outcomes and security of tenancy.^{38, 39} It is important to also note that

consideration must be given to the safety and priorities of each person – for example it may be necessary for a victim survivor of domestic violence to be located away from a perpetrator.

The design and quality of housing is also key to sustained tenancy and health and wellbeing outcomes. Social housing and rental properties tend to have high levels of unmet maintenance need, with people on low incomes disproportionately affected by poor quality housing, which exacerbates inequalities in relation to factors such as homelessness and health.⁴⁰

For Aboriginal people, families and communities, outcomes such as successful tenancy (including security of a property as well as non-housing outcomes such as improved health and wellbeing) require choice in terms of housing location and design and allocation of housing that considers cultural and community connections.^{41,42}



Recommended levers for action:

- Social housing, as well as crisis, transitional and long-term supported accommodation options expanded in terms of design and location
- Revision of locational needs assessments for allocating social housing that better consider health, social, economic and cultural needs of individuals
- More social housing, and incentives for development of affordable rentals, designed for the specific needs of Aboriginal people, families and communities in order to meet Closing the Gap target 9A: ‘By 2031, increase the proportion of Aboriginal and Torres Strait Islander people living in appropriately sized (not overcrowded) housing to 88 per cent.’

Person-centred systems and services

People’s experiences of homelessness are complex. There is a need to balance flexibility with consistency – there must be transparent, standardised processes on eligibility, application, rights, exits from services etc., but there must also be in-built capacity in service design and funding allocation so that support services and housing models can meet individualised needs.^{43,44}

**Recommended levers for action:**

- ‘No wrong door’ policies that are adequately structured and resourced
- Flexible funding models that allow services to deliver support that they can tailor to individuals
- Social housing systems that allow people to have choice of housing type and location
- Housing First models that provide for unconditional housing with the option for individualised supporting depending on the needs and priorities of the individual

Cultural safety and self-determination

Aboriginal and Torres Strait Islander people experience disproportionately high rates of homelessness, estimated to be more than eight times the rate of homelessness compared to non-Indigenous Australians.⁴⁵ Solutions must be Aboriginal-led, building on the strengths of Aboriginal and Torres Strait Islander people, families and communities as the foundation for change.⁴⁶ Further, cultural dimensions and understandings of homelessness must inform policy. For example, some Aboriginal people in Australia understand home and homelessness in relation to cultural, spiritual, familial and land dimensions.^{47, 48}

People from culturally and linguistically diverse backgrounds may experience barriers to accessing homelessness services if support is not culturally appropriate and sensitive.⁴⁹ Specialist services, with culturally diverse staff, as well as broader cultural safety capacity across the sector are important.

**Recommended levers for action:**

- Development, and integration into policy and outcome measurements, of culturally-informed definitions of homelessness, home and housing
- Investment in Aboriginal Community Controlled Organisations
- Increased numbers of Aboriginal people and people from culturally and linguistically diverse backgrounds working in homelessness services (including

in leadership and specialist roles) via long-term investment in training, education and workforce remuneration

- Housing options that prioritise connections to Country and cultural dimensions of home
- Improved cultural safety capacity of all people working in health and human services (including homelessness specific services) through ongoing professional development
- Alignment of The Plan with Closing the Gap goals and measures

Trauma-informed and trauma-preventative systems and services

The prevalence of trauma is very high among people who experience homelessness – homelessness is both a cause and a symptom of trauma.⁵⁰ A trauma-informed approach means that the following principles should be embedded in all aspects of The Plan⁵¹, for a system-wide approach: safety; trustworthiness and transparency; peer support; collaboration and mutuality; empowerment, voice and choice; and recognition of cultural, historical, and gender issues.⁵² It also means shaping health and human services systems (including homelessness services) that do no harm. This recognises that institutions have historically caused, and continue to cause, trauma and re-traumatisation and some institutions such as out-of-home-care and prisons are associated with higher transitions into homelessness.⁵³



Recommended levers for action:

- Development of a framework for preventing and responding to trauma – what does ‘trauma-informed care’ mean in relation to ending homelessness?
- Policies, procedures and training in place to ensure that *all* people who work in any aspect of homelessness service design and delivery practice trauma-informed care
- Models of funding and systems that facilitate coordinated care across homelessness, housing, domestic violence, mental health, disability, drug and alcohol, Aboriginal and family support services

- A commitment to, and action plan for, ensuring that no person transitions from a government institution into homelessness
- Processes and resources (including services and specialist housing) to facilitate supported transitions out of institutions such as hospitals, prisons, residential care and out-of-home care

Preventing and responding to climate risks

People experiencing homelessness are among those most vulnerable to the impacts of climate change.⁵⁴ For example, people experiencing homelessness may have little protection during heatwave or air pollution events and be exposed to loss of temporary shelter associated with flooding events.⁵⁵

Further, climate change is a risk factor for increasing the numbers of people who become homeless. Loss of housing, loss of income and mental health impacts associated with disasters such as floods and fires has been shown to be associated with increases in the numbers of people who become homeless and displaced long term.⁵⁶



Recommended levers for action:

- Integration of climate change, housing and homelessness policies
- Sustainable, environmentally sound social and affordable housing design that considers tenants' safety and wellbeing in relation to climate and disaster
- Health and homelessness outreach services to prevent and respond to health impacts of climate change events such as heatwaves
- Coordinated disaster planning that includes homelessness service providers, and considers impacts on those already homeless and those likely to be displaced by disaster

KEY AIMS AND MEASURING IMPACT

We advocate for a Plan that focuses on prevention and early intervention. The Plan should be underpinned by a robust measurement framework in order to assess progress against the aim of making homelessness rare, brief and non-recurring. There is a requirement for regular, transparent reporting of measures, and coordination and communication responsibilities to be clearly delegated. Strong governance is crucial to ensuring robust design, accountability and monitoring of implementation.

We endorse the recommendation of Homelessness Australia, calling for an independent, expert Advisory Council on Homelessness that brings together people with lived experience, the homelessness sector, First Nations representatives, human services sectors and research experts.

MAKE HOMELESSNESS RARE

Preventing homelessness by addressing the drivers

The Issues Paper identifies a number of inequalities in the experiences of homelessness among particular groups of people. This highlights the importance of a structural approach to addressing the drivers of homelessness that are at the heart of these inequalities. It also indicates the importance of a multifaceted homelessness service system, and an accessible and affordable housing system that meets the needs of all people. Key to all of these drivers are:

- Alleviation of poverty (in all its forms); and
- Action against discrimination and inequity.

This entails improvements to key parts of the system such as income support payments, access to preventative health services, child and family support early intervention, the justice system, aged care, accessible workplaces and spaces, and racism.



Metrics to measure progress (examples)

- Rates of poverty and distribution of wealth
- Number of people provided support to prevent homelessness
- Number of people experiencing homelessness by demographic (gender, age, indigenous status, disability)
- Percentage of households in rental stress
- Number of domestic and family violence incidents
- Number of alcohol related hospitalisations
- Number of people with chronic health conditions (including mental illness) who experience homelessness
- Number of people on income support payments
- Levels of income support payments
- Number of children removed from their family's care
- Number of people who exit prison into homelessness
- Number of people who exit hospitals into homelessness
- Number of people who have been in out-of-home-care who experience homelessness

MAKE HOMELESSNESS BRIEF

A strong, well-resourced homelessness and housing support sector

The Plan must articulate how the health and human services sector will be expanded and strengthened to do the work of preventing, and supporting pathways out of, homelessness. It should be founded on a commitment to, and investment in, Housing First as a core approach to supporting pathways out of homelessness, while recognising the diverse needs of different groups of people.

It must consider:

- Growth and development of the skilled workforce, with targeted strategies for rural and remote services, Aboriginal and Torres Strait Islander workforce, peer/lived experience

workforce, child and youth specialists, and specialist domestic and family violence workforce;

- Multi-faceted services that can be ‘wrapped around’ a person depending on their specific preferences and needs;
- Early and impactful interventions – coordinated, cross-services pathways out of homelessness from people’s very first point of contact with the system; and
- More supported transitions in, and out, of institutions such as hospitals, prisons, residential care and out-of-home care.



Metrics to measure progress (examples)

- Number of people accessing specialist homelessness services by demographic (gender, age, indigenous status, disability) and reason
- Average time spent waiting for a housing outcome
- Number of people supported into housing
- Satisfaction percentage reported by people supported in the homelessness system
- Rates of homelessness sector staff recruitment and retention
- Diversity of the homelessness sector workforce (lived experience, indigenous status, age, languages spoken, culture, disability and gender)

MAKE HOMELESSNESS NON-RECURRING

A safe home and the support to keep it

The Plan must demonstrate how it will break cycles of repeat homelessness. It needs to set out steps for increasing the availability of safe emergency, transitional, medium-term and long-term accommodation that can be provided alongside support services tailored to individual pathways out of homelessness. It should commit to increased investment in social housing, with the goal that by 2050 social housing accounts for at least 10% of all housing stock. The Plan should consider:

- Legislating for social and supported housing options;
- Investments to create diverse housing options; and
- Ongoing access to health, human services and income support to maintain wellbeing and connections to community.



Metrics to measure progress (examples)

- Percentage of rental vacancy available for people on low incomes
- Social housing as a percentage of residential dwellings
- Number of people on the social housing waiting list and time spent waiting
- Number of people supported out of homelessness that have retained their home for two years or more

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