

Submission to the National Housing and Homelessness Plan Consultation

NSW Council of Social Service

20 October 2023

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 **ncoss**
NSW Council of Social Service

About NCOSS

NSW Council of Social Service (NCOSS) is the peak body for non-government organisations in the health and community services sector in NSW. NCOSS works to progress social justice and shape positive change toward a NSW free from inequality and disadvantage. We are an independent voice advocating for the wellbeing of NSW communities. At NCOSS, we believe that a diverse, well-resourced and knowledgeable social service sector is fundamental to reducing economic and social inequality.

Acknowledgement of Country

NCOSS respectfully acknowledges the sovereign Custodians of Gadigal Country and pay our respects to Elders, past, present and emerging. We acknowledge the rich cultures, customs and continued survival of First Nations peoples on Gadigal Country, and on the many diverse First Nations lands and waters across NSW.

We acknowledge the spirit of the Uluru Statement from the Heart and accept the invitation to walk with First Nations peoples in a movement of the Australian people for a better future.

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For this submission

We would very much welcome the opportunity to discuss the recommendations and submission with you in greater depth. Should you have any questions, please do not hesitate to contact NCOSS Acting CEO [REDACTED]

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Introduction

NCOSS welcomes the invitation from the Australian Government and The Hon Julie Collins MP Minister for Housing and Minister for Homelessness to respond to the National Housing and Homelessness Plan Issues Paper (the Issues Paper). With declining home ownership across Australia, decades of neglect in the provision of social housing, and a worsening rental crisis, we call on the Government to develop an ambitious and comprehensive plan to solve Australia's housing crisis.

Informing our submission, we draw on NCOSS' high-quality research and the expertise of our members, who deal with the issues facing our community on a daily basis. These include the impacts of insecure, unsafe and unaffordable housing; mental ill-health; domestic and family violence; the Cost-of-Living crisis; the disproportionate impacts of poverty on First Nations communities; and the ongoing, repeated impacts of climate disasters. We refer the Minister for Housing and Homelessness and other interested parties to our most recent research reports and submissions including:

- [*Barely Hanging On – the Cost of Living in NSW 2023*](#) (August 2023)
- [*Mapping Economic Disadvantage in NSW*](#) (May 2023)
- [*Aftershock: Addressing the Economic and Social Costs of the Pandemic and Natural Disasters Report Three – Housing Security*](#) (October 2022)
- [*Homelessness in People Over 55*](#) (June 2022)

These reports highlight the extent of the problem, the experience of people living in poverty and disadvantage, and outline what is urgently needed to address the current housing crisis and improve housing outcomes for people in NSW. Building on this work, in this submission, we provide our response to the Issues Paper in a national context.

Homes for Everyone

Australia is in the top 20 nations for GDP per capita yet we struggle to keep a roof over the heads of all our citizens. We face an unparalleled housing crisis with one of the worst levels of housing affordability in the world.¹

The compounding effects of COVID-19, sky-high inflation and successive disasters have had severe impacts. Interest rate rises and surging rental prices over the last 12 months are a big part of the story, substantially reducing housing affordability and the ability to pay for other essentials. There has been a notable increase in the number of low-income households experiencing housing stress. This is most pronounced for renters, one third of whom are now in extreme housing stress, with more than half their income being consumed by rental costs.²

Renters also face insecure tenancies, housing that can be poorly maintained and unhealthy, an inadequate regulatory framework, and a social and affordable housing safety net that is diminished and not able to 'catch' people in desperate need.

Our most disadvantaged communities including young people (aged 12 to 24) and First Nations households are overrepresented in homelessness statistics (25% and 20% respectively)³, and nearly 5000 women, every year, in NSW alone, either return to violence or become homeless due to a lack

of long-term affordable housing. Overall 124,000 Australians live without a secure or appropriate roof over their head, yet investment in social housing barely scratches the surface.

Meanwhile governments around Australia have committed to self-determination for First Nations communities through Closing the Gap agreements, yet funding agreements and commissioning processes continue to be focused on line by line accountabilities with little decision making power handed over to communities in reality.

At NCOSS we believe that the housing crisis is solvable and that the solutions are clear. A mature and capable housing and homelessness sector have been delivering appropriate and affordable housing and housing services, as well as rental reform, for many years now with an increasing commitment to localised place-based solutions that work. Complex partnerships and programs, technological and financial innovation, and new ways of thinking about a range of housing issues underpin an increasingly sophisticated sector. It is crucial that decision makers engage with the strengths of the sector and the communities they work with, with the latest research, and with the opportunity provided by the development and implementation of the National Housing and Homelessness Plan to tackle this crisis head on.

Our approach

The focus of our work is always the lived experience of people – to understand the impacts of poverty and disadvantage on families, children, young people, older people and everyone who has been dealt a tough hand in life - and to identify the critical role of governments and the not-for-profit sector in mitigating those impacts.

Appropriate and affordable housing is a key element of social support that underpins the mental and physical wellbeing of people and allows them to participate fully in all that life has to offer – including education, employment, and social connection. It is through this lens that we respond to the Issues Paper outlining what we see as critical factors for a successful plan, and comprehensive recommendations for targeted investment, improvements to service delivery, and sector sustainability.

Our submission responds to the following focus areas:

- Homelessness
- Homelessness services
- Aboriginal and Torres Strait Islander housing
- Social Housing
- The Private Rental Market in Australia
- The Impact of Climate Change and Disasters on Housing Security, Sustainability and Health

We particularly focus on the plan's intention to provide:

- *A better understanding of the current state of housing and homelessness in Australia and what is contributing to homelessness and housing insecurity.*
- *A clear, long-term vision for the future of housing and homelessness policy in Australia.*
- *Insights about specific housing and homelessness needs in urban, regional, rural and remote Australia.*

- *National goals and objectives for housing and homelessness, including how these will be achieved.* (Commonwealth of Australia (Department of Social Services) 2023 p10)

NCOSS calls on the Government to use the development and implementation of the Plan as an opportunity to correct the failing trajectory of the housing eco-system in Australia and address decades of neglect. Our recommendations are drawn from an evidence base of research and engagement with lived experienced advocates, members, service providers, working groups, and communities. We outline **what** needs to be done and refer the Minister to the advice and perspective of our specialist housing and homelessness peak bodies for a more detailed analysis of **how** it is to be done.

Critical Factors for Success

To be successful, the Plan must position housing as *essential social infrastructure* and articulate:

- An understanding that poverty, inequality and disadvantage are the key drivers of homelessness and housing stress.
- An ambitious set of outcomes with an explicit aim to prevent homelessness and provide access to appropriate and affordable housing for everyone in housing need.
- A long-term set of targets and the investment required to achieve them, including required allocations in Commonwealth and State budgets and forward estimates.
- An integrated planning framework with a direct line of sight from the Plan to the National Housing and Homelessness Agreement, consistent with other plans including the National Plan to End Violence Against Women and Children, the National Mental Health and Suicide Prevention Plan, the National Agreement on Closing the Gap and other relevant plans, such as the National Disaster Risk Reduction Framework and Action Plans.
- A co-ordinated response that clearly outlines roles and responsibilities across all levels of government; the housing, tenancy, Aboriginal Community Controlled, and homelessness sectors; business; and other related sectors, to build towards an integrated and collaborative housing eco-system.
- A framework for real self-determination in First Nations communities, with a move to “light-touch” and substantial funding agreements placing decision-making within communities themselves.
- Elevated relationships with neglected stakeholders, including lived experience advocates and generalist services including Neighbourhood Centres, ACCOs and multi-cultural organisations.
- Meaningful engagement with the added risks and costs that climate change brings.

Endorsements

This submission is endorsed by the following organisations:

- Aboriginal Community Housing Industry Association NSW
- Faith Housing Australia
- Homelessness NSW
- Tenants Union NSW
- Western Sydney Community Forum

In addition we refer the Minister to the following submissions:

- ACOSS
- Community Housing Industry Association Australia and National Shelter
- Faith Housing Australia
- HomelessnessNSW
- QCOSS
- Tenants Union NSW
- YFoundations

A note re Acronyms

ACCOs – Aboriginal and Torres Strait Islander Community Controlled Organisations including ACHPs

ACHPs – Aboriginal and Torres Strait Islander Community Controlled Community Housing Providers

AHPs – Aboriginal and Torres Strait Islander Housing Providers including state agencies, Land Councils, ACHPs and ACCOs providing a range of services including housing

First Nations – all Aboriginal and Torres Strait Islander peoples

Key Recommendations

We call on the Federal, State and Territory governments to work in partnership with stakeholders to develop and implement a National Housing and Homeless Plan with a shared vision to end the housing crisis in Australia and provide homes for everyone in housing need. We call for an ambitious plan that will:

1. Recognise poverty as a key driver of homelessness:

- a. Support an immediate increase in the rate of income support payments including JobSeeker and Youth Allowance to at least \$78 a day; with regular indexing linked to Age Pension increases.
- b. Support changes to the CRA including benchmarking it to rents and re-targeting eligibility to include low-income earners.

2. Implement immediate improvements to homelessness services:

- a. Increase funding for Specialist Homelessness Services by 20% and provide contract certainty of at least 7 years (10 years in remote areas).
- b. Establish an evidence-based, data-informed funding model that is linked to population growth, demand indicators, economic and workforce conditions, and the real cost of service provision including consistent indexation across all parts of the housing system.
- c. Introduce older persons housing services across Australia similar to the Home at Last model.

3. Take a prevention approach to youth homelessness:

- a. Work with youth housing peak organisations and services to establish targets for the improved resourcing of youth housing services and the sufficient provision of crisis, temporary and long-term housing.

4. Prioritise and adequately fund Housing First/Permanent Supportive Housing programs across Australia:

- a. Engaging with the 40% of SHS clients, including families, with complex needs.
- b. That are compliant with the key features of the model to enable successful long term housing outcomes.

5. Recognise the role that neighbourhood centres, Aboriginal Community Controlled Organisations, multicultural organisations and similar place-based services play in essential housing support:

- a. Work with state governments to ensure that all parts of the housing access system are sustainably funded.

6. Value First Nations ways of knowing, being, doing in all aspects of housing and homelessness services and supply for First Nations communities:

- a. Review existing arrangements for funding and commissioning of housing and homelessness services and supply to ensure genuine place-based leadership and decision-making by First Nations communities.
- b. Recognise the maturity and leadership of Aboriginal Housing Peak bodies, and the Aboriginal Community Controlled housing and homelessness sectors, including Aboriginal

Community Housing Providers, and support their proportionate growth with appropriate targets and purposeful investment in: growing capacity, sector development, service delivery, and housing supply.

- c. At a minimum immediately allocate 20% of Social Housing Accelerator Funds and Housing Australia Future Fund investments for housing developed and designed by First Nations communities in collaboration with Aboriginal Community Controlled organisations and Aboriginal Community Housing Providers.
- d. Resource First Nations organisations, peaks and communities to grow successful and appropriate home ownership programs.
- e. Immediately increase funding allocations for existing Aboriginal Community Controlled specialist homelessness services by at least 20%
- f. Align investments with, and improve on, Closing the Gap housing targets including Target 9.

7. Invest in a long-term plan to re-invigorate the social (public and community) and affordable housing sectors and provide affordable, safe and healthy homes for low-income households:

- a. Immediately review rent setting and income eligibility policy and practice for social (public and community) and affordable housing across all jurisdictions, to ensure access to housing options that keep people out of poverty.
- b. Establish agreed measures of housing need.
- c. Set targets in each jurisdiction for the supply and maintenance of social (public and community) and affordable housing, and the associated investment required, that meets unmet housing need - with due consideration given to housing sector capacity issues, construction workforce and material supply issues.
- d. At a minimum, set targets to build towards approximately 10% of all housing (as per jurisdictional needs) as social (public and community) and affordable housing, over a 20 year time frame.
- e. Ensure housing supply is delivered through a place-based approach and aligned with the demographics, mobility, and support needs of diverse households, and is culturally appropriate.
- f. Alongside the role that public housing agencies must be supported to play, identify a complementary, significant role for the Community Housing sector and Aboriginal Housing Providers to plan, lead, and deliver developments at scale (in collaboration with communities, state housing agencies, and the private sector).
- g. Improve transparency in relation to social and affordable housing supply by providing public access to appropriate metrics and information.
- h. Identify and implement tax settings to ensure that housing subsidies and tax incentives are targeted to where they are most needed.

8. Introduce a national framework to make renting fair and a viable long term option for all Australians:

- a. Introduce limits on rental increases so they are fair and reasonable.
- b. Ban rent bidding.
- c. Expand the Rent Choice program across Australia with adequate targets and funding.
- d. Eliminate no grounds terminations.

- e. Set legally enforceable energy efficiency standards for rental housing to protect against heat, cold, mould, and pollution.
 - f. Allow pets in rentals.
 - g. Establish a permanent hardship framework.
 - h. Support better enforcement, oversight, and accountability in private rental markets.
 - i. Improve access to free advice, assistance and advocacy with appropriate increases in funding for tenancy advice services to meet rising demand.
- 9. Mitigate the devastating impacts of disasters for people experiencing poverty and disadvantage:**
- a. Immediately invest in sufficient social and affordable housing to address critical shortages of appropriate and sustainable housing in high risk regional, rural, remote, and urban areas.
 - b. Proactively equip and resource high risk areas to develop and implement collaborative Housing Masterplans in the immediate aftermath of disasters - bringing together government agencies with local stakeholders including housing organisations.
 - c. Embed and resource place-based NGOs in emergency management systems to improve local emergency planning, responses, and recovery, including the provision of adequate housing, with ACCOs and ACHPs leading service delivery for Aboriginal communities at critical response points.
 - d. Embed disaster management responsibilities in NGO service contracts, including provisions recognising increased responsibility and resourcing where relevant.
 - e. Ensure recovery grants are made immediately available to local Community Housing providers, including ACHPs, and specialist homelessness services to support people made homeless as a result of disasters.
- 10. Ensure social and affordable housing is fit for purpose in a warming world and does not put the health of low-income households at risk:**
- a. Prioritise the upgrade of inefficient fixtures (water, heating, and cooling) and improve the thermal performance of existing social housing stock.
- 11. Provide better housing options for people with disability, mobility issues, families and older people:**
- a. Mandate minimum accessibility standards (Silver Level Livable Design) in all jurisdictions and across all housing types (social, affordable, private) in line with the National Construction Code.

Homelessness and Homelessness Services

Dimensions of homelessness

Australia, New Zealand and the UK have the highest rates of homelessness for countries in the OECD with similar definitions of homelessness.⁴ Finland, Poland and Norway have the lowest rates. If Australia were to set its sights on achieving similar rates of homelessness to these countries it would translate into providing safe, secure homes for over 100,000 people currently experiencing the deprivations of homelessness.

A number of groups are more vulnerable to homelessness, including women, children and young people, refugees and asylum seekers, First Nations people, people leaving institutions such as hospital and prison, and people living with disability or mental illness.⁵ In addition, it is likely that rates of homelessness for older people have been underestimated.

“In some instances older women are moving from one insecure situation to the next, staying with friends or family, without recognising that they are homeless. There is a degree of hidden homelessness.....living at friends or relatives’ homes, couch surfing, pet sitting, travelling etc. that is not counted in statistics and the clients do not recognise they are in fact homeless”

Community service provider, regional NSW, 2020

Recent events have demonstrated the impact that collaboration between government and the community sector can have on addressing enduring problems. The response to protect and house people experiencing homelessness during the emergence of COVID-19 is an example of what can be done under extraordinary circumstances. In contrast, inadequate collaboration with NGOs by emergency response management systems in NSW during the 2022 floods has shown what can happen when governments get it wrong.

Impacts and challenges of homelessness

A home provides the foundation on which people can build their wellbeing and manage life’s opportunities and challenges. A decent, secure home keeps people safe from extreme weather, supports good health, protects women and children fleeing violence, allows ageing in place and provides the basis for people to engage productively in their community.

“I am a woman, I have had career breaks to raise my child, I have balanced work with caring responsibilities, balanced work with the cost of childcare (which sometimes didn’t breakeven), my super is low, and I have needed to dip into it at times. But I am one of the lucky ones to have had stable, affordable accommodation, and the support of the Community Housing sector. There are too many that have not had this opportunity, too many that are needing to rely on handouts, on charities, too many that are disempowered every day with the significant effort to keep food on the table, a roof over their head and those of their children, to keep the power on, a phone connected, and to also hide the stress from their children and loved ones.” Community Housing Tenant 2021⁶

Homelessness can expose people to violence and victimisation, including rape and sexual assault, and can result in long-term unemployment and the development of chronic ill health. Many health

problems are a consequence of homelessness, including depression, anxiety, poor nutrition, feelings of shame and stigma, poor dental health, substance abuse and other mental health problems.⁷ The threat of more severe forms of homelessness can lead people to live in unsafe, unhealthy housing.

“We see people living in non-compliant housing or living with black mould since the floods..., whose only other option is homelessness.” Neighbourhood Centre, Regional NSW 2021

For First Nations people, homelessness and forced relocation due to the lack of appropriate housing, can lead to disconnection from family, kinship and community groups, affecting social and emotional wellbeing, and compounding trauma from past unjust Governmental policies.⁸

Homelessness exacerbates and complicates the treatment of many health problems with less access to health services due to financial hardship; lack of transportation; lack of adequate identification or Medicare Card; and difficulty maintaining appointments or treatment regimes.

Some health problems can cause a person to become homeless, as people with chronic physical or mental health issues are less able to find or maintain employment and keep a roof over their head. Studies show that people experiencing homelessness have higher rates of death, disability and chronic illness than the general population.⁹

Poverty, Inequality and Disadvantage Driving Homelessness

Lack of Affordable Housing

The overwhelming issue for most people experiencing homelessness is a lack of affordable housing and poverty.¹⁰ As home ownership becomes increasingly unaffordable, low-income Australians have been locked out of the housing market. Across Australia more than half (58%) of low-income households in the private rental market are in rental stress and affordability has worsened in regional areas in every state¹¹.

The recent Anglicare Rental Affordability Snapshot¹² identified that across Australia:

- There were no rental properties affordable for single people on Job Seeker (no change from 2022).
- For single people on the Age Pension, only .4% of rental properties were affordable (decrease since 2022).
- For single people earning the minimum wage, only .8% of rental properties were affordable (effectively halved since 2022).
- For single parent families on income support (with up to two children), no more than .1% of properties were affordable
- For single parent families on the minimum wage, just .7% of properties were affordable (no change from 2022).
- For couple families on income support, the figure was .2% (no change).
- For couple families where one member of the couple was receiving minimum wage, only 3.3% of housing was affordable (decrease from 2022).

“The crisis in rental affordability has not crept up on Australians out of the blue... It has happened because governments have allowed it.” Anglicare Australia 2022 p16¹³

As private rental costs have skyrocketed,¹⁴ investment in social housing continues to decline. Investment by both federal and state governments has been declining over the last 3 decades, with social housing now making up around 4% of all housing stock in NSW (compared with 6% in the early 1990s).¹⁵ Recent investments, including the Housing Australia Future Fund, and the Social Housing Accelerator while welcome, will barely scratch the surface of housing need.

Multiple lockdowns during COVID-19 have highlighted overcrowding¹⁶ as a serious public health issue and key driver of homelessness in NSW.^{17,18} While severe overcrowding decreased by 6 per cent in NSW (from 2016 to 2021)¹⁹ it is still a major factor for homelessness in Western and South Western Sydney²⁰ – areas most heavily impacted by outbreaks during lockdowns.

Affordability and associated supply issues have been exacerbated by recent disasters across Australia including bushfires, Covid-19, and floods.

Stagnant and Inadequate Social Safety Net

Income support continues to decline in real terms and, while the recent boost to CRA and Job Seeker was welcome, it was not sufficient to address decades of neglect.

Following the May 2023 Federal Budget, JobSeeker increased to \$53.85 per day, with Youth Allowance just \$42.85 per day. While these increases make a difference, it is well below the Economic Inclusion Advisory Committee's finding²¹ that current income support payments were seriously inadequate. Without increasing JobSeeker, Youth Allowance, and other related payments, people will be further entrenched in a cycle of poverty as they struggle with significant increases in the cost of housing and other essential items.

Further raising the rate of these payments to match pension rates, benchmarking CRA to actual rents, and re-targeting eligibility to include low-income earners²², would provide immediate relief to those struggling to keep a roof over their heads and food on the table.

Impacts: Poverty and Disadvantage - Students

"On the second day of TAFE this semester 2 out of 40 students made me aware that they have no food for lunch and were eating noodles most nights for dinner. They advised that they had to spend all their funds on rent... I am going to advise the students [REDACTED] of locations where food boxes are distributed - not my core business but essential for students impacted by high rents and at risk of homelessness. Students are unable to meet their basic needs and therefore unable to concentrate on classwork, learning and assessments.

These students have no family support and are socially isolated due to their circumstances. I have given students food so that they can remain in class to complete assessments. The chronic rental price situation is impacting students attempting to gain an education and qualifications. Even students accessing free courses cannot learn in these circumstances and are flagged as 'at risk'."
Teacher, TAFE, NSW 2023

Family and Domestic Violence

In NSW alone, every year, an estimated 2,402 women return to live with a violent partner because of a lack of affordable alternatives, and a further 2,410 become homeless because they could not find secure and permanent housing after fleeing violence.²³ While state government investment in new models of crisis accommodation such as the 'Core and Cluster' model is welcome, women, and children, still need a safe, secure home once they leave crisis accommodation.

Across Australia, around 37% of SHS clients overall reported experiencing family and domestic violence.²⁴ Nearly a quarter of older people (over 55) presenting to homelessness services are escaping domestic or family violence.

"I work with a number of older women who are faced with homelessness if they leave a situation with abusive family members. (Intersectionality of elder abuse usually perpetrated by adult children, history of DV, trauma history, isolation). The hopelessness of ever finding safe, affordable housing for older women means they feel forced to stay. This is unacceptable. They are also forced to enter aged care due to a lack of housing - again this is unacceptable." Community legal service, metropolitan NSW, 2020

In 2021, Aboriginal and Torres Strait Islander women were 33 times higher than other Australian women to be hospitalised as a result of family violence. Hospitalisation rates among Aboriginal and Torres Strait Islander peoples in remote areas, compared to capital cities, are twice as high for injury caused by assaults, and more than 3 times higher for injury caused by family violence related assaults. These outcomes are exacerbated by issues of lower employment and service availability. Regional and remote areas often have fewer resources such as specialist services and are more affected by workforce instability, lack of housing, and fragmentation.²⁵

Mental Health/Alcohol

Despite public assumptions about the causes of homelessness, only 40 per cent of people presenting to homelessness services for assistance report mental health or drug and alcohol problems. A significant minority report mental health issues while a much smaller cohort experience problematic drug or alcohol use:

- 37% reported a current mental health issue.
- 10% reported problematic drug and or alcohol use.²⁶

Research is showing more and more that mental health and addiction are driven by a complex combination of factors, including adverse life experiences such as poverty, trauma, and disadvantage eg racial discrimination.²⁷ Secure housing itself is a significant driver of mental health and access to mental health services.

"For those Australians who experience mental ill health, living in safe, secure and stable housing is an important part of their road to recovery... Housing which fosters meaningful relationships for individuals, both in the home and the community, is associated with improved wellbeing and quality of life, and decreased symptoms and service use." (AHURI Brief 2022)

Impacts: Mental Health, Poverty and Housing

"I can no longer survive on just the DSPⁱ - rising living costs mean I now HAVE to work, regardless of how unwell I am. This has introduced a whole new anxiety: the stress of not being able to afford to be sick. I watch friends getting sicker and sicker as they're forced to work more than their bodies can handle. I've been nursing a ball of tension in my gut for weeks now about my housing situation - my eviction day is [REDACTED]"

[REDACTED] I've been approved for an apartment under the National Rental Affordability Scheme. I don't have to live somewhere that will make me sicker and further isolate me. I'm going to be able to live somewhere that is healthy and positive." Lived experience advocate 2023

Challenges for Specialist Homelessness Services

Increasing Demand

Australia's Specialist Homelessness Services (SHS) sector serviced 272,700 people in the financial year 2021/2022. In NSW, demand for services increased by 10% in the first half of 2023.²⁸ Unmet demand is high and many people are unable to access services, or get the support they need.²⁹

From previous NCOSS consultations with service providers, a common refrain has been that the need for emergency and transitional accommodation is far greater than availability as people are not able to move to permanent housing. This results in them cycling back through homelessness, refuges and other unsatisfactory arrangements. We heard in one region that caseloads for Specialist Homelessness Services are triple that for which they are funded; but that funding levels have been the same for four years, putting more pressure on staff and ramping up caseloads.³⁰

Administrative Burdens for Services

NCOSS released new research in 2022 - [The High Cost of Doing Business – administrative and management overload for smaller NGOs](#) - undertaken in conjunction with Ask Insight. It highlights the increasingly complex operating environment for small to medium-sized NGOs, including SHS, and the growing administrative burden they bear, exacerbated by COVID and other disasters. It explores the impact of multiple funding agreements, inadequate recognition of back-office costs in funding specifications, growing compliance requirements, the multitude of different definitions, templates and portals that organisations grapple with, and the 'discontinuity' costs associated with short term grants.

Recognition and support for SHS

The contribution of the SHS sector needs to be recognised and backed by an evidence-based, data-informed funding model that is linked to population growth, demand indicators, economic and workforce conditions and the real cost of service provision including consistent indexation.

ⁱDisability Support Pension

In the meantime, a boost of 20 per cent to recurrent baseline funding would enable the sector to manage increased costs and risks incurred due to:

- rising demand and cost of service provision.
- increased data collection and reporting requirements by funding agencies.
- increased responsibility in the level, type, complexity and location of service deliverables.
- more onerous contract terms with no guarantee of annual indexation or growth funding.

Adequate baseline funding is imperative to support ongoing sustainability and the real costs involved in the delivery of specialised services to vulnerable groups.

Permanently increasing recurrent baseline funding will also strengthen ACCOs in their provision of culturally-safe, community-led support for First Nations Australians, who continue to experience disproportionate levels of disadvantage and homelessness.

Targeted programs for positive housing outcomes

Successful programs for young people

Successful housing programs for young people discussed at the “New Models for Youth Housing” session³¹ of the National Housing Conference 10 -12 October 2023 all shared common features:

- Provision of emergency, crisis, and temporary housing that was a pathway to more permanent housing.
- Person centred support with parameters set by the young people themselves.
- Support that was attached to the young person not the tenancy.
- Appropriate high-quality housing with high levels of amenity and safety, private spaces that enable young people to “practice” independence, situated in diverse multi-generational communities.

Major barriers identified by providers were:

- Inability to attract partnerships with community housing providers due to the constrained incomes of young people.ⁱⁱ
- Reliance on philanthropy to adequately fund housing and service provision (in addition to government resources).

Youth housing providers noted the need for quarantining of social and affordable housing supply specifically for young people - with additional subsidy to make it viable for providers.

Older People - Home at Last

Successful Specialist Homelessness Services for older people have been developed in Victoria - “the Home at Last” model - that provide housing information and support including both early intervention and crisis responses. This model includes peer educators to work with communities to raise awareness of housing options for older people, tailored housing information, assistance with housing applications, support for moving and establishing a new home, and referrals to aged care and other

ⁱⁱAs well as funding from government CHP’s rely on rental income and CRA to sustain a viable business model.

supports. *“Effective provision of information requires consideration of the stigma, shame and hidden nature of older people’s risk and experiences of homelessness.” (Ageing on the Edge 2021 p11)³²*

Complex needs - Housing First

Approximately 40% of clients of Specialist Homelessness Services present with complex needs including mental health issues and/or Alcohol and other drugs (AOD).³³ There is a large evidence base on the efficacy of the housing first model for people with high needs and additional vulnerabilities.³⁴ Housing First (or Permanent Supportive Housing – PSH) programs provide a suitable long-term home and wraparound support *for as long as is needed* to people experiencing homelessness - to ensure they are able to deal with the ongoing impacts of trauma, mental and physical health issues, and/or addiction, and attain the stability they need to maintain a tenancy and improve their quality of life.

The NSW Together Home program was conceived and implemented during Covid-19, housing 1,050 rough sleepers by mid 2022. While widely referred to as a Housing First program, it was more in the nature of a highly successful rapid re-housing program.³⁵ It is likely that some of its clients will churn back into homelessness once the 24-month time frame for housing and support is up. Increased investment across Australia is desperately needed for long term programs that meet all the criteria for successful Housing First models.

“International evidence confirms that PSH reduces people’s use of institutional and emergency services and is likely to result in overall savings for governments in the medium to long term. For example, an evaluation of Common Ground Brisbane showed that although the cost of providing the housing and support was about \$35,000 per annum per formerly homeless person, this still represented a cost saving to the Queensland government of almost \$15,000 per person per year.” Launch Housing 2019 p³⁶

While Housing First programs and targeted SHS such as Home at Last services are important, neither will succeed unless housing supply issues are first addressed.

Housing First: Linking Hearts Service

Muslim Women Australia (MWA), is a registered Community Housing Provider (Tier 3 CHP) and delivers the leading multicultural Specialist Homelessness Service in NSW - the Linking Hearts Multicultural Family Violence and Homelessness Service. Linking Hearts is an example of an integrated place-based Housing First model, which delivers support to multicultural communities across Greater Sydney. MWA reports that it has experienced an 30% increase in demand year on year for this service.

The model caters to specialised tenant needs focusing on culturally safe, prevention and early intervention, safe and supported crisis and transitional accommodation, rapid rehousing and intensive support for clients with complex needs.

It ensures access to housing options while providing services which are culturally appropriate, client centred and trauma informed that prioritises safety and affordability, while facilitating access to legal, migration, financial, employment, educational, health and spiritual services. This model prioritises dignity and fosters effective outcomes for clients focusing on agency, workforce participation and maintaining community, social and diaspora connections.

MWA has found that this model of working is achieving positive outcomes, ensuring that the principle of social housing continues to serve as a safety net while also facilitating re-entry to the private market. However these models need to be resourced.

By creating and embedding partnerships with other local organisations, the program taps into a range of services that offer clients a more holistic service. For example, in partnership with MTC Australia, MWA provide job readiness courses. The Skills for Education and Employment (SEE) Program is set out to improve language, literacy, digital and numeracy skills and most importantly, it develops employability skills. These improvements enabled participants to engage more effectively in further training and increase the necessary skills to obtain long-term employment. The program was extremely successful, with half of the students successfully finding a job and another quarter receiving interview invitations.

Muslim Women Australia 2023

Value and support essential community services

Neighbourhood centres and other critical social infrastructure, such as multicultural services and Aboriginal Community Controlled Organisations (ACCOs), have been lifelines during recent disasters. They distributed food and financial aid, checked in on the socially isolated, translated complex messaging and ensured that available relief, including housing, reached those whose need is greatest.

These services also provide social connection and psychological support. Financial hardship can be both mentally draining and lonely - the poorest one-fifth of Australians are more likely to experience high levels of psychological distress; while people living below the poverty line are twice as likely to not go out or catch up with family and friends, and to not be able to afford the internet or mobile data.³⁷

Neighbourhood centres fill this gap. They also act as a gateway, helping people navigate complex systems, such as the housing system, to get the services they need. Neighbourhood Centres, ACCOs, and CALD organisations work in their communities to offer assistance with housing applications, housing transfers, and access to crisis accommodation.

ACCOs are the first port of call for many Aboriginal people and their families, often providing wrap-around services on an informal (unfunded) basis that other mainstream services are funded to provide. Aboriginal people are more likely to approach ACCOs when they are socially, physically and economically very vulnerable.

The Queensland Government recently doubled core funding to its network of 127 neighbourhood and community centres, recognising their vital role during tough times. But in NSW there is no core funding, and neighbourhood centres are dependent on attracting program-based funding which doesn't cover core operational costs, and must rely on fundraising efforts and volunteers to bridge the gap.

It is time these services were acknowledged as a vital part of the housing access system and provided with core funding to allow them to continue to provide these essential housing services.

Recommendations

1. Recognise poverty as a key driver of homelessness:
 - a. Support an immediate increase in the rate of income support payments including JobSeeker and Youth Allowance to at least \$78 a day; with regular indexing linked to Age Pension increases.
 - b. Support changes to the CRA including benchmarking it to rents and re-targeting eligibility to include low-income earners.
2. Implement immediate improvements to homelessness services:
 - a. Increase funding for Specialist Homelessness Services by 20% and provide contract certainty of at least 7 years (10 years in remote areas).
 - b. Establish an evidence-based, data-informed funding model that is linked to population growth, demand indicators, economic and workforce conditions, and the real cost of service provision including consistent indexation across all parts of the housing system.
 - c. Introduce older persons housing services across Australia similar to the Home at Last model.
3. Take a prevention approach to youth homelessness:
 - a. Work with youth housing peak organisations and services to establish targets for the improved resourcing of youth housing services and the sufficient provision of crisis, temporary and long-term housing.
4. Prioritise and adequately fund Housing First/Permanent Supportive Housing programs across Australia:
 - a. Engaging with the 40% of SHS clients, including families, with complex needs.
 - b. That are compliant with the key features of the model to enable successful long term housing outcomes.
5. Recognise the role that neighbourhood centres, Aboriginal Community Controlled Organisations, multicultural organisations and similar place-based services play in essential housing support:
 - a. Work with state governments to ensure that all parts of the housing access system are sustainably funded.

First Nations Housing

Ongoing impacts of dispossession and disadvantage

With caution and consideration, we acknowledge that much data collected and collated in relation to First Nations people is frequently contaminated and misrepresents communities. Data held and hosted by Government authorities is frequently known to not represent community as:

- Many Aboriginal people (especially in rural and remote areas) have limited access to literacy support to complete census forms in their entirety and/or with accuracy.
- Some Aboriginal people will not actively participate in Government data collection activities, in active defiance, or as a point of sovereignty.
- Aboriginal people remain fearful of complete disclosure to Government through reporting on household compliment, ages, needs (e.g. disability) and accommodation size as the impact of past Government policies remains in the living memory of communities.
- Fear of Government removal of children because of inadequate housing is a genuine and experienced fear for Aboriginal families, with Dept of Communities and Justice assessments for child safety in NSW struggling to separate poverty and neglect.
- Census data poorly reflects the issues associated with Aboriginal homelessness, as many homeless persons were not registered against an address to obtain data collection advice.³⁸

Notwithstanding the above qualifications the data available leads to an understanding of a sombre state of housing for Australia's First Nations people. First Nations people have much lower home ownership rates than the general population – 42% in comparison to over 60%. 18% of First Nations people in Australia rely on social housing with 35% renting in the private rental market.³⁹ 25% live in overcrowded homes.⁴⁰ First Nations people are proportionally over-represented at 15% of social housing applicants (in NSW),⁴¹ 20% of the homeless population,⁴² and 29% of clients of SHS.⁴³ In 2018 there was a shortfall of over 10,000 social homes for Aboriginal households in NSW alone (with little progress made since).⁴⁴

In regional NSW, a lack of quality housing for First Nations communities is a longstanding issue that needs to be addressed. Recent investment in NSW in new and upgraded social and affordable homes in partnership with Aboriginal Housing Providers is a positive step. But more is urgently required to address chronic undersupply, protect vulnerable communities from the ravages of climate change, and meet the Closing the Gap targets.

Studies show that much of the housing in remote First Nations communities will become uninhabitable by 2050 due to current substandard housing quality and rising temperatures.

“Current regional and remote Indigenous housing stock is unable to provide consistently healthy and comfortable indoor environments. There seems to be an unstated assumption that what is practically sustainable for governments and housing providers is the undersupply of substandard housing serviced by inconsistent repairs and maintenance.” (Lea et al 2021 p 2)⁴⁵

Substandard housing has a number of health and wellbeing impacts on First Nations people and their families including psychological duress, skin infections, poor educational outcomes, faster

transmission of infectious diseases, and poor nutrition due to inadequate food preparation and kitchen facilities. Access to safe and healthy housing is related to the staggering rates of First Nations children in out of home care⁴⁶. First Nations children are taken from their families at 12 times the rate of non-indigenous children.⁴⁷

Without good quality and appropriate housing for all First Nations peoples, there will be more First Nations people at risk of poverty and homelessness. Children will continue to be removed from their families and older First Nations people will struggle to step in as kinship carers; in the words of First Nations leaders, this will lead to a new stolen generation of First Nations people.

“Spiritual homelessness” - being disconnected from kinship networks, heritage, family and community can also significantly affect First Nations people when they are not able to access housing on Country.⁴⁸ This adds another dimension to First Nations housing and underlines the importance of place-based and localised solutions for First Nations communities.

We also know that crises impact already vulnerable communities even harder. First Nations peaks and organisations have been working overtime to address the impacts of various climate crises and natural disasters on their communities including bushfires, floods, and the pandemic. Yet there are very few First Nations community controlled SHS providers and all are overstretched.⁴⁹ Even whilst there are many ACHPs across NSW, the majority are underfunded or not funded at all for the entire roster of assistance - including wrap around services that makes the scarce bricks and mortar housing solution a successful proposition for very vulnerable First Nations people and families.

Value First Nations Ways of Doing, Being, Knowing

It is clear that governments need to provide resources to address the ongoing impacts of dispossession, exploitation, and colonisation on Aboriginal communities. In NSW in 2022, one per cent of the state’s resources were going to Aboriginal infrastructure, services and programs, when Aboriginal people make up 3.4% of the population. Only a quarter of that one per cent goes to ACCOs.⁵⁰ Transformation requires financial resources and a consistent long-term approach developed by First Nations communities for First Nations communities.

First Nations stakeholders at a recent NSW state government roundtable hosted by NCOSS in partnership with NSWLALC and NSW Aboriginal Affairs described competitive tendering and other mainstream commissioning processes that create false “efficiencies” and waste millions of dollars across the social services sector, leading to a one-size-fits-all approach. They highlighted that these have the most impact on ACCOs (including housing providers) who are unable to compete with larger or better resourced organisations, and who have skill sets and strengths not recognized by current practices. In addition, reliance on short-term contracts, and program-based piecemeal funding and grants have significant impacts across the whole sector but particularly for ACCOs.⁵¹

“I do my grant applications at one in the morning”

Manager, ACCO, regional NSW 2022

Support and long-term resourcing for ACCOs, including Aboriginal Community Housing Providers (ACHPs), is imperative to address the new stolen generation and the lack of affordable and healthy

housing, the exploitation of Aboriginal workers in “care” economies, and little progress across a range of Closing the Gap indicators.⁵²

First Nations stakeholders highlighted the “cognitive dissonance” of governments saying they value and listen to Aboriginal people and the community controlled sector - while imposing white ways of doing things on Aboriginal services – including outdated commissioning processes; inappropriate reporting mechanisms and racist approaches to indicators and outcomes measurement; and child protection tools that punish families for being poor and living in unsuitable housing. Supporting and enabling the groundbreaking work of a mature Aboriginal Community Controlled sector, and communal approaches to problem solving, are critical to dealing with the long-term impacts of decades of neglect in First Nations housing.⁵³

“When we talk about Community Controlled, we are still linked to funding contracts and KPIs and all those sorts of things. And when we do come up with local decisions and we design community led markers and data repositories and things like that it's fraught with barriers where they (the government) hide behind ritualistic decision making - so in the true sense of self determination, in my humble opinion, the whole system needs to be dismantled.”

CEO, ACCO, Non-Government Organisations Roundtable 2022

Aboriginal Housing Provider: Yumba Meta – Hillside Gardens Development

“Hillside Gardens Residential Estate Development Hillside Gardens Residential Estate has proven a shining jewel in Yumba-Meta Limited’s property development portfolio. The estate, located on 50 acres of land in the foothills of Mt Louisa, was designed to facilitate pathways to Indigenous home ownership. Thirty-four of the 41 land lots were sold to private buyers and the remaining lots were retained by Yumba-Meta Limited [for affordable rental and disability housing]. The last 15 lots sold during the 2020-21 financial year, with the final lot sold in February 2021. Land sales from Hillside Gardens totalled \$2.2 million.

████████████████████████████████████████ the development of Hillside Gardens was a “game-changer” for the local Indigenous community. “Aboriginal and Torres Strait Islander peoples face multiple barriers to homeownership, including inter-generational poverty resulting from dispossession, low income and insecure employment,” he said. “The staged development of Hillside Gardens allowed ██████ to fund the subdivision progressively— as we sold blocks to private buyers, these funds financed the construction of the rental housing and supported three young Indigenous families on their path to homeownership.

“We’ve been able to create a well-designed, village-like atmosphere in an enviable location within easy reach of amenities,” said ██████████. Hillside Gardens is located just six kilometres from Willows Shopping Centre, is a short 13-minute drive to Townsville University Hospital, James Cook University and Lavarack Barracks, and is close to public and private schools.”

Yumba Meta 2023⁵⁴

Recommendations

6. Value First Nations ways of knowing, being, doing in all aspects of housing and homelessness services and supply for First Nations communities:
 - a. Review existing arrangements for funding and commissioning of housing and homelessness services and supply to ensure genuine place-based leadership and decision-making by First Nations communities.
 - b. Recognise the maturity and leadership of Aboriginal Housing Peak bodies, and the Aboriginal Community Controlled housing and homelessness sectors, including Aboriginal Community Housing Providers, and support their proportionate growth with appropriate targets and purposeful investment in: growing capacity, sector development, service delivery, and housing supply.
 - c. At a minimum immediately allocate 20% of Social Housing Accelerator Funds and Housing Australia Future Fund investments for housing developed and designed by First Nations communities in collaboration with Aboriginal Community Controlled organisations and Aboriginal Community Housing Providers.
 - d. Resource First Nations organisations, peaks and communities to grow successful and appropriate home ownership programs.
 - e. Immediately increase funding allocations for existing Aboriginal Community Controlled specialist homelessness services by at least 20%
 - f. Align investments with, and improve on, Closing the Gap housing targets including Target 9.

Social Housing

The best early intervention to prevent homelessness is to establish a pipeline of affordable, safe, and secure homes to house people in (backed up by appropriate and targeted homelessness and housing services). *“Rigorous research has shown that there is no single intervention more effective in ending homelessness”* (Homelessness NSW 2022 p8)⁵⁵

NSW and Australia have waited too long – the need for strong political leadership from all levels of government and considered evidence-based approaches to address our housing crisis is imperative. Governments need to pivot from *responding* to homelessness to *preventing* homelessness and making it “rare, brief, and non-recurring”.

It has been clear for a long time that markets do not affordably house low-income households. It is the work and responsibility of governments in collaboration with the not-for-profit sector. Governments across Australia need to recognise housing as important social infrastructure that, like other infrastructure, brings enormous economic benefit, and has dedicated investment pipelines in the tens of billions of dollars - not the piecemeal and sporadic amounts currently on offer. To do anything less continues the neglect of past governments and avoids seriously addressing an overwhelming crisis affecting **hundreds of thousands** of Australians.

Social Housing and Poverty

There is currently a wide range of eligibility income limits for social housing across all jurisdictions. For example:

- In Victoria a family with two children on a gross household income of \$118,768 or less, is eligible for social housing.
- In NSW the equivalent is \$81,380.
- In QLD it is \$51,948.

These differences reflect differences in housing markets and in historical policy settings. In NSW the [Mapping Economic Disadvantage in NSW Report 2023](#) from NCOSS (supported by NATSEM) shows that the highest rate of poverty for any demographic group is for those living in public housing – at almost 60%. This group has also seen the largest percentage point increase since 2016, especially for those public housing tenants living in Greater Sydney.

To ensure that social housing options are able to keep people out of poverty, rent setting and income eligibility limits for social and affordable housing need to be reviewed in reference to local housing markets, agreed on housing need measures, and other methodologies including residual income approaches to assessing housing affordability.

Defining Social Housing Need

While social housing wait lists are often used as a proxy for housing need researchers generally identify housing need through a range of different measures. The NHFIC report [State of the Nation's Housing 2022–23](#) has an excellent summary of methodologies for assessing housing need (pp 95-96). Many organisations currently use a demographic model which identifies housing need as:

- Met need - Existing social housing households.
- Manifest or implied need – the homeless population.
- Evident need – low income households, in the two lowest income quintiles (Q1 and Q2) paying more than 30% of their income on rent (these households are defined as being in rental stress).ⁱⁱⁱ

Some organisations further clarify this model by identifying that unmet social housing need is in reference to Q1 and unmet affordable housing need is Q2. The NHFIC report referenced above uses Q1 only to define unmet housing need noting some differences in perceptions of relative prosperity by low-income households - particularly in Q2. Counter to this is a discussion of the impacts of rental stress in low-income households in NCOSS's report *Barely Hanging On* (outlined in the next section - The Private Rental Market).

Critical to an effective Housing and Homelessness Plan is the need to establish agreed measures of housing need for both social and affordable housing that are explicitly outlined in the Plan and reviewed on an ongoing basis. Housing targets need to be set in reference to those agreed measures and include:

- Social Housing
- Affordable Housing (see break out box on page 26).
- Reference to and clarification of discounted housing for essential workers.

Housing Need: UNSW City Futures Research

Current research by the UNSW City Futures Research Centre for the Community Housing Industry Association shows that, according to the demographic model outlined above, across Australia in 2021 there was:

- A shortfall of affordable homes for households in the lowest income quintile(Q1) of 437,000 dwellings.
- A further shortfall of affordable homes for households in the second-lowest income quintile (Q2) of 203,000 dwellings.

This research outlines that over a 20 year timeframe (to 2041) projected unmet need would grow to a total of 942,000 dwellings. To meet this need would require that social housing (or a considered mix of social and affordable housing) would need to grow to 10.5% of all housing stock.

Housing Need: Affordable Housing

Further complexity is added in the Australian context by the lack of clarity around “Affordable Housing”. “Affordable” housing is generally taken to be housing that costs no more than 30% of a household's income.

In NSW many “affordable” housing programs actually offer *discounted* housing at a proportion of market rent – tenants are matched to ensure they are paying no more than 30% of their income on the set rent – meaning that these programs have a very narrow bandwidth of eligibility - with some people falling through the gaps: earning too much for social housing and not enough to match the “affordable” income level for affordable housing. This is particularly a problem in urban areas where even discounted rents are unaffordable for low-income households.

Agreement on “affordable” housing programs needs to be clarified to enable a consistent approach across jurisdictions and to ensure that affordable housing programs are available firstly to those most in need who don't meet income eligibility requirements for social housing, with discounted housing available for key workers who provide essential services and are needed to keep local economies functioning.

Long-term investments for long-term benefit

It is not a lack of innovation, strategies, or partnerships that is a barrier to social and affordable housing supply – it is the lack of investment by governments. The National Housing and Homelessness Plan needs to identify funding streams and the long-term investments at scale that will ensure an adequate supply of this essential social infrastructure into the future.

We know what works in terms of homelessness services, partnerships, design, place-making and social inclusion, localised solutions, institutional investment, and scaling up.⁵⁶ The growth of the Community Housing Sector including Aboriginal Community Housing Providers, has deepened their capacity to develop high quality social and affordable housing at scale. The National Housing Finance and Investment Corporation (NHFIC), the National Affordable Housing Alliance (NAHA), Housing and Homelessness peak bodies, housing research institutes, and not-for-profits have identified pathways to investment by governments and institutional investors.

Previous economic analysis commissioned by NCOSS and NSW housing and homelessness peak bodies has demonstrated the economic benefits from investing in social and affordable housing. This includes stimulus to the residential construction sector and flow-on benefits for small to medium enterprises, as well as savings, and boosts to government revenues and the wider economy.⁵⁷

Analysis also highlights the broader, long-term benefits due to improved housing security, health and economic participation. Estimates show a return on investment of more than \$4.80 for each dollar invested across a range of indicators including:

- Health and wellbeing
- Educational outcomes
- Consumption and productivity
- Employment and economic output.⁵⁸

To build to approximately 10% of all residential dwellings as social and affordable housing over a 20 year timeframe⁵⁹ would require significant investments by Federal and State Governments. While detailed costings are beyond the scope of this submission, indicative estimates^{iv} demonstrate that these investments are a fraction of current state infrastructure budgets. Following this period of “catch-up”, investments required would be comparatively modest.

Costs can be significantly reduced in the long term, and significant savings made through:

- Land grants to housing providers of excess commonwealth or state land.
- Upfront capital grants with re-investment of rental income by housing providers (after operating costs).^v
- Debt serviced programs (for example building on the Housing Australia Future Fund) noting that these programs, while mitigating upfront costs, cost more in the long term.⁶⁰
- Supporting the development of mixed tenure developments by mandating appropriate levels (at least 30%) of affordable and social housing when disposing of government land.
- Ensuring a proportion of developer contributions are appropriated to support social and affordable housing.⁶¹
- Inclusionary zoning for all new developments across Australia with appropriate mechanisms, subsidies, and tax settings in place to support this.
- Adjusting tax settings, such as negative gearing and capital gains discounts, to ensure that housing subsidies and tax incentives are targeted to where they are needed instead of supporting speculative property investment. **Possible savings of up to \$28bn per annum.**⁶²
- Adjusting stage 3 three tax cuts and redirecting savings to social housing investment. **Possible savings of up to \$18bn per annum.**⁶³

An appetite for change

There is no reason NOT to solve the housing crisis in Australia – with political messaging aimed at highlighting the positive impacts of addressing the housing crisis and the cost-of-living crisis, as well as positive productivity, health and wellbeing impacts *now* is the time to act. The development and launch of the National Housing and Homelessness Plan is a perfect opportunity to get things right and provide access to appropriate and secure housing for all Australians into the future.

A recent report *The Australian Housing Monitor Housing Affordability: Experiences, Attitudes, and Appetite for Change 2023* documenting the results of a survey of 4733 Australians, broadly representative of the Australian public, showed that:

- 70% support increasing the supply of public housing.
- 62% are concerned about the decrease of public housing construction.
- 58% agreement that governments should remove tax deductions for housing investors and use the money to build more public and community housing.

^{iv} Based on NHFIC estimates of land and construction costs of \$500,000 per dwelling and CityFutures research on housing need (Housing Need breakout box page 25 - Q1 only).

^v While this proportion is small, over longer time frames it would build to create significant savings on required investments.

Housing Need: Place Based and Diverse Housing

The shortage of appropriate and affordable rental housing in Western and South-Western Sydney is a key factor in overcrowding for families in these areas. There is a high migrant population that have either deep, long standing or new ties to these suburbs due to the proximity to their families, communities, religious and social activities. Western and South-Western Sydney also feature higher proportions of households living on low incomes or below the poverty line. Specialist, culturally-appropriate services are concentrated where their communities live. Many migrants, particularly those who have newly arrived, do not speak English well or at all and/or have complex needs rely on such services to trouble-shoot and navigate the complex Australian systems. This makes it extremely important for them to live close to their established community networks and services.⁶⁴

Whether it is due to the constrained supply and variety of private and social rentals, unaffordability of housing or preference to live in larger, multi-generational households, areas of Western and South-Western Sydney experience severe overcrowding. New migrants express a need to remain close to their community of support and are willing to live in unsustainable and/or unsuitable housing to ensure that they can.

Current housing stock in these areas, both private and social, are inadequate to meet the needs of large families. Government policies tend to favour the replacement of larger social housing that are older separate houses with predominantly smaller one- and two-bedroom strata dwellings. Social housing is lacking the provision for larger families in estate redevelopment, particularly in areas of high need for larger homes. The private rental market is also failing in this regard. Privately owned sites lack a mix of dwelling types or there is limited to no adequate affordable targets in renewal areas and major rezonings.⁶⁵

Recommendations

7. Invest in a long-term plan to re-invigorate the social (public and community) and affordable housing sectors and provide affordable, safe and healthy homes for low-income households:
 - a. Immediately review rent setting and income eligibility policy and practice for social (public and community) and affordable housing across all jurisdictions, to ensure access to housing options that keep people out of poverty.
 - b. Establish agreed measures of housing need.
 - c. Set targets in each jurisdiction for the supply and maintenance of social (public and community) and affordable housing, and the associated investment required, that meets unmet housing need - with due consideration given to housing sector capacity issues, construction workforce and material supply issues.
 - d. At a minimum, set targets to build towards approximately 10% of all housing (as per jurisdictional needs) as social (public and community) and affordable housing, over a 20 year time frame.
 - e. Ensure housing supply is delivered through a place-based approach and aligned with the demographics, mobility, and support needs of diverse households, and is culturally appropriate.

- f. Alongside the role that public housing agencies must be supported to play, identify a complementary, significant role for the Community Housing sector and Aboriginal Housing Providers to plan, lead, and deliver developments at scale (in collaboration with communities, state housing agencies, and the private sector).
- g. Improve transparency in relation to social and affordable housing supply by providing public access to appropriate metrics and information.
- h. Identify and implement tax settings to ensure that housing subsidies and tax incentives are targeted to where they are most needed.

The Private Rental Market

NCOSS' 2023 [Mapping Economic Disadvantage in NSW](#) research shows the grim reality of poverty in NSW and how private renters are amongst the hardest hit. Across the State, of all housing tenures, the private rental market has the largest number of people experiencing poverty – at over 412,000. This means that 1 in 5 private renters in NSW live in poverty. In some parts of Greater Sydney, the rate of poverty for people living in private rentals has reached almost 50%, while other areas across NSW are over 50% (i.e. more than half of private renters in that area live below the poverty line)³.

At the same time as poverty rates have increased for this group, so too has the proportion of people living in rental properties. This is a warning for the future – as more people become reliant on the private rental market, more people are at risk of experiencing poverty.

First Nations people have noted inequitable access to the private rental market for many decades, citing intrinsic racism as the cause. Reports from service providers and lived experience advocates highlight discrimination in the private rental market with Landlords and Agents actively declining to accept applications based on physical appearance.

The escalating cost of housing has placed a tremendous burden on individuals and families, with many spending too much of their income on rent, leaving too little for other essentials. The case study below clearly articulates the reality for many renters, particularly in the current cost-of-living crisis – intense stress, disruption, and sacrifice, all of which have severe intergenerational impacts.

Impacts: Rental Crisis

■■■■ a migrant who came to Australia 32 years ago and has 5 children. She cares for one of her daughters who has a disability and pays for the university costs of her eldest daughter, as her daughter is not eligible to receive a study allowance from Centrelink. The most challenging issue ■■■■ faces is finding a stable home for her and her children.

"I've lived in ■■■■ houses over ■■■■ states... my kids don't have a lot of friends because we keep moving... sometimes the rent goes up, or sometimes the owner wants to sell the house... I'm so stressed, I can't move anymore... it's too much for me, it's too stressful for my kids... it's affected my daughter with a disability, it's too much. It affects me a lot, to wake up every morning and say I have to prepare my kids to move... I don't want to tell my daughter that. Now it's stable, and I don't want her to go back to zero again."

■■■■ has had to go to extreme lengths to cut costs around the house. She doesn't use the heater and has stopped using the oven as it uses too much electricity. She keeps the lights off as much as possible. Her rent is subsidised via government assistance, which a women's association helped her to access. However, once this expires she will be paying up to 85% of her wages on rent.

"If I pay for [the full cost of] rent I don't even have money to get food for my kids... it's going to be tough. Everything goes up – clothes, food, everything. Wages don't go up. I go shopping every two weeks, and every two weeks the same food I get goes up every time."

Cost of Living Crisis for Renters

With rents rising across Australia and increases in Sydney over the last 12 months of between 29% to 40%,⁶⁶ more and more households are going into housing stress.

As at 2022, 58% of lower income households in the private rental market were paying more than a third of their income on rent.⁶⁷ In regional NSW, the number of low-income households paying more than half of their income in rent, a measure of severe housing stress, increased by 52 per cent between 2020 and 2022.⁶⁸

NCOSS's [Barely Hanging On – the Cost of Living Crisis in NSW](#) research demonstrated how significant this issue is in 2023, with 79% of private renters in housing stress and 33% in severe housing stress. It also showed that 67% of private renters had experienced a rental increase in the past 12 months.

The research (surveying 1,134 people who are on low-incomes or living below the poverty line^{vi}) highlights the impacts of cost-of-living pressures on low-income renters:

- 71% of renters had no money set aside for emergencies
- 54% had to obtain financial assistance from friends or family (at least once in the last 12 months)
- 49% had used Buy Now Pay Later to buy essential goods such as groceries
- 24% had sought assistance from a community organisation
- 41% could not pay utility bills on time
- 37% could not afford to travel for essential reasons
- 32% were unable to pay for mobile data or internet at home
- 28% could not make the minimum payment on their credit card
- 26% could not pay their rent on time.

Impacts: Rising Rents

Single Person Household, Newcastle:

“You keep quiet and you be a good tenant in the hope that you will be a small target...you put up with things because you don’t want to be evicted out of spite. So, it was really upsetting to get a rent increase ...I had a mental health breakdown the day that I got the letter – I had psychologically prepared myself as I know landlords are taking advantage of the current climate to put rents up, even though I know he doesn’t have to pay a cent on this house because it is fully owned. I got that email and started crying and just curled up in my bed – I couldn’t process it, it was just so gutting...to accommodate \$20 is one thing, but to accommodate \$45 is a lot. I just felt like I was losing all housing security...”

NCOSS and Institute for Public Policy and Governance 2023 p41

^{vi} Roughly equivalent to the two lowest income quintiles.

Single Parent, Central Coast:

■■■■ a single mother of three girls who lives on the Central Coast. In the past two years, her rent has jumped from \$410 to \$570 per week, and as she only works part-time, she struggles to pay this. However, ■■■■ is apprehensive to move because of the rental crisis, the cost of moving and the instability for her kids. Instead, she has cut down on special occasions and holidays, going out, and getting take-away food. ■■■■ she is living pay check-to-pay check and avoids driving long distances because of the cost of fuel.

“The rent’s going up, but my wage hasn’t gone up, government assistance hasn’t gone up and I have got to keep a roof over mine and my kids’ heads... I live cent to cent, right down to my last 5 cents... I don’t think [the government] really understand how hard it is... not just for single parents, but for people on dual incomes. Unless you have lived it, you don’t know the struggle.”

■■■■ had to pull her four year old out of childcare because she can’t afford it, and she now brings her child to work with her. Although she receives government assistance, ■■■■ says she doesn’t want to become reliant on it.

“You want to be a good role model for your kids and have a strong work ethic and not have to rely on anyone else to dig you out of your hole.”

NCOSS and Institute for Public Policy and Governance 2023 p42

Make Renting Fair

The National Housing and Homelessness Plan provides the opportunity to make renting fair by implementing a national framework, building on the Better Deal for Renters agreement. This would establish a shared set of rights and protections for renters and shared ambition for improvement across the rental housing system, while safeguarding against any regression of rights in any jurisdiction. Progress towards such a national framework should not stop immediate action by states and territories for rental reform.

Limiting Rental Increases

In NSW and most other jurisdictions the onus is on renters to challenge excessive rent increases. With calls for a rent freeze and limits on increases, there is an opportunity for governments to work together to establish reasonable rent increase mechanisms based on CPI or other measures. These limits could act as threshold rather than a cap – above which landlords could apply to the appropriate tribunal to request a larger increase if justified. In addition, residential tenancies Acts across Australia should limit rent increases to once in a 12-month period, after an initial 12 months has lapsed for any type of lease (currently not required for shorter fixed term leases in NSW).⁶⁹

Reforms are also needed to completely eliminate rent bidding and put in place fair and administratively simple processes where:

- A fixed rental price must be advertised at the time a property is put up for rent. This advertised rate would act as a ceiling.
- Landlords, real estate agents, other third parties and potential tenants must not offer, solicit, or accept a higher rental rate than the originally advertised rate.⁷⁰

These changes will limit the worst impacts on low-income renters and provide greater certainty for renters and landlords alike.

Ending No Grounds Evictions

Urgent reform is needed to address inadequacies in Residential Tenancies Acts to make renting a viable, long-term housing option.

Ending the ability of landlords to terminate agreements without justification is a much-needed reform to the current system. In NSW, over 80% of renters have lived in their current rental property for less than 5 years, with a third for less than one year. 20-30% of renters move due to an eviction, around a quarter of which are due to ‘no fault’ termination or ‘no grounds’ evictions.⁷¹

The cost, short-timeframe, and disruption of an eviction can be a significant driver of poverty and homelessness, with the average cost of moving for renters being \$3,500.

“Many low-income renting households are not able to raise the relatively large sum of money required to secure alternative housing and move at short notice.” Tenants Union 2022 p 45⁷²

Immediate improvements should be made by ensuring renters have legislative protection against unfair evictions including a list of reasonable grounds, and protections against the false use of eviction grounds. Residential Tenancies Acts would be significantly improved by establishing prescribed reasons for all types of leases, notification periods of at least 120 days, restrictions on re-letting, evidence requirements, and significant penalties for breaches of the law.

While there is usually disquiet around rental law reform affecting supply in the private rental sector, a recent report from AHURI shows that reforms have little effect on landlords entering or withdrawing from the private rental market:

“The analysis supports the characterisation of Australian tenancy law as accommodating of landlords. While the prospect of reforms may cause some would-be investors to pause, the analysis does not support the contention that tenancy law reforms have caused landlords to disinvest.” (Martin et al 2022 p 2)⁷³

Impacts: Housing Insecurity

“I work in social services. Every week I talk to someone who is privately renting and 1/ being evicted due to sale of property, or 2/using their savings to pay rent, or 3/ skipping meals to pay rent. I am having to recommend social housing to people who have never considered it before because it offers low rent and security. The application is a very demoralising process and they are repeatedly told there is no housing and the wait for a home is 10 years. But I have nothing else to offer them...”

Real Estate Agent and Tenant Advocate 2023

Changing the Rules to Allow Pets in Rentals

Pet ownership in Australia is one of the highest in the world – pets support mental health, provide companionship to the socially isolated, and are a key factor in choice of housing for many.

Renters already constrained in their choice of housing by low incomes, the inadequate supply of affordable housing, and the general precarity of renting, should not be further constrained by rental legislation that disallows pets. Nor should the onus be on vulnerable renters to press their case for having their pets live with them in their own home.⁷⁴

Renters should not have to go to extensive lengths to assert their rights to keep pets. To ensure that disputes are kept to a minimum landlords should have to seek an order from the state rental authorities to refuse a request for pets. Authorities can then be guided by local laws and existing legislation.

Impacts: Pets in Rentals

“(There is) minimal availability in rentals and what is available will not allow pets – many young people that we work with have pets – and as this usually is the only reliable thing they have in life many won’t consider housing without their pet”

Case Manager, Specialist Homelessness Service, Mid North Coast 2023

Hardship Framework

An increasing number of people across Australia are likely to rent through their entire lives. Over a lifetime, many people are unable to maintain their income without interruption from health issues, economic restructuring, family emergencies, natural disasters, childcare, or global crises such as the COVID-19 pandemic. Temporary changes in life circumstances should not put people’s homes at risk.

Current hardship provisions in the NSW Act are rarely used and are skewed in favour of the landlord.⁷⁵ A number of reforms could be pursued (across all jurisdictions) that would improve tenancy stability, as well as reduce the burden of costs imposed on renters from forced evictions:

- Introduction of a permanent hardship framework to support renters to maintain their tenancy and avoid eviction. This could include measures such as temporary rent variations and an expansion to government subsidies such as Rent Choice (NSW).
- Where tenants are evicted for reasons other than a breach, introduction of provisions requiring compensation for moving costs by the landlord.
- Consideration of the feasibility of a mandatory landlord insurance scheme and/or landlord rental bond scheme to cover the cost of hardship provisions such as rent reductions or provision of moving costs.⁷⁶

Energy Efficiency Standards

Households living on lower incomes continue to spend a significant part of their disposable income on energy costs.⁷⁷ They often have little control over the energy efficiency of their home and little financial capacity to upgrade appliances, install adequate heating or cooling, or address damp and mould. Unhealthy homes are making tenants and their families sick.⁷⁸ With landlords retaining the power to evict tenants with no justification, renters are not in a position to insist on adequate standards.⁷⁹

Rental reform establishing minimum standards for energy efficiency and putting the onus on landlords to show their properties comply will create local jobs, savings for the health system, and protect the environment. [The Community Sector Blueprint: National Framework for Minimum Energy Efficiency Rental Requirements](#) details how this can be done effectively and fairly.

Better regulatory support for renters

In order for rental reforms to be effective they must be backed up by better enforcement, oversight and accountability. Too often the responsibility lies with vulnerable renters to take action to enforce the laws. Government agencies should have the resources they need to effectively enforce rental regulations and penalties for non-compliance, as well as support tenant self-advocacy.

Tenancy Advice and Advocacy Services are key services providing advice and assistance for renters. These services sustain tenancies, reduce evictions directly into homelessness, and reduce debts. However, the funding for such services has not kept pace with the growth in renting and increasing vulnerability of low-income renters.⁸⁰ Likewise, funding for systemic housing advocates is also limited.

Mechanisms to support accountability, data collection and oversight such as landlord registration or licensing schemes must also be considered.

Recommendations

8. Introduce a national framework to make renting fair and a viable long term option for all Australians:
 - a. Introduce limits on rental increases so they are fair and reasonable.
 - b. Ban rent bidding.
 - c. Expand the Rent Choice program across Australia with adequate targets and funding.
 - d. Eliminate no grounds terminations.
 - e. Set legally enforceable energy efficiency standards for rental housing to protect against heat, cold, mould, and pollution, and reduce emissions.
 - f. Allow pets in rentals.
 - g. Establish a permanent hardship framework.
 - h. Support better enforcement, oversight, and accountability in private rental markets.
 - i. Improve access to free advice, assistance and advocacy with appropriate increases in funding for tenancy advice services to meet rising demand.

The Impact of Climate Change and Disasters on Housing Security, Sustainability and Health

Bushfires, floods and COVID-19 have thrown into stark relief the need for more social and affordable housing in regional areas to address homelessness from natural disasters and their economic impacts. Across Australia planning systems need to adapt and change to ensure that housing adequately addresses the likelihood of increased temperatures, bushfires, and extreme weather events such as floods and cyclones. Emergency management systems need urgent revision to include place-based local NGOs, who were left out of the mix in the recent flood response in NSW.

NCOSS has been working closely with impacted services in the NGO sector first through our Building Resilience for Emergency Responses Project and now through the Community Sector Disaster Capability Project. We convened a Northern Rivers Floods Working Group from April 2022 to April 2023 to inform our advocacy.

The Northern Rivers Experience

An ongoing housing shortage

Before the devastating floods in 2022, families in northern coastal areas of NSW were already being forced to live in tents, cars and other makeshift arrangements because there was simply nowhere affordable or available for them to live. Many households were still affected by previous floods and bushfires in the region, living in overcrowded or substandard conditions with significant health, safety and well-being impacts. This includes Aboriginal families and communities who were already disproportionately impacted by disadvantage.

Services were straining at the seams before the floods - for example, prior to the floods the Northern Rivers region was home to 30% of the state's rough sleepers, yet it received only 6% of funding for Specialist Homelessness Services.

Impacts of disaster on services and communities

The pressure on services during the floods was enormous. CHP and SHS providers were directed at short notice to manage emergency accommodation camps because government staff were not yet trained. There was confusion around the requests and expectations on these services to provide emergency accommodation, as there had not been a clear distinction made between emergency accommodation (required in the immediate aftermath of disaster) and temporary accommodation (which is part of these services' ordinary contracted deliverables).⁸¹

These services were also being expected to manage people in emergency accommodation who were affected by trauma and were in distress, because recovery agencies were referring people to these services rather than to the necessary mental health supports. On top of all this, the majority of staff in these services were themselves impacted by the floods but expected to continue providing support to the community.

“Many of my colleagues are living in their cars with COVID right now”

Family services provider, Northern Rivers area 2022

Over 7,000 properties in the Northern Rivers were affected by the floods in 2022 and over half of those were classed as uninhabitable. This means that thousands of people continued to be in acute housing stress. Some of these people were staying in temporary accommodation provided by government, while most others relied on family, friends and other community members who offered up rooms for those that were displaced.

These type of arrangements were not sustainable in the medium term while households waited to return to their homes or find longer term housing. NGOs supporting vulnerable clients in housing leased through the private market were also impacted by the dire situation. Where the housing had been flood affected, services placed their clients in whatever temporary arrangements could be found (motels, caravans, mobile homes, and much later, pod villages). This wasn't ideal for people with complex issues (NDIS clients, young people in out-of-home-care, women and children leaving domestic violence), with displacement and separation from circles of support adding to the trauma.

In order to avoid homelessness many local Aboriginal families relocated to other areas, across State boundaries, causing disconnect from Country, home and belonging. Sometimes this was to prevent interaction with Government agencies who had the authority to remove children from families as a result of their homelessness (the same agencies were often responsible for emergency evacuation centres). Many of these families still struggle to return to their communities of belonging as accommodation is not available, unaffordable and offers no security of tenure.⁸²

Housing many of the most vulnerable in temporary pod villages (with living circumstances impacted by a lack of privacy, domestic and family violence, lack of access to transport and other issues) where timeframes and pathways out of the villages are still uncertain, highlights the need for a more strategic approach to housing need that considers future disaster contexts.

Flood repairs to both NGO owned and leased priorities were delayed by the shortage of tradespeople, in part due to the lack of accommodation. Where landlords were able to quickly repair housing, they often moved in themselves, from more affected properties, or increased rents dramatically due to sky-rocketing demand. Services reported that households were being evicted from private rentals via no grounds terminations so landlords could leverage this demand and increase rents. In addition services were unable to engage the workers they needed to address rising demand in the aftermath of the floods. Again, this was due to the worsening housing shortage.⁸³

Uncertainty continues and, over a year on, communities continue to be impacted. Many people expecting to be assisted by the Resilient Homes program missed out but it took over a year for them to find this out. The absorption of the Northern Rivers Reconstruction Corporation into the NSW Reconstruction Authority has meant changing of the goal posts and further angst and confusion for local residents and services.⁸⁴

Impacts: Housing shortages for older women and disaster.

“For older women on a fixed income in the Lismore area there is just no affordable housing available. It’s either social housing or homelessness and the wait for housing in the Tweed is 15 years. Older women are being forced into unsuitable housing such as converted pubs with shared bathrooms and kitchens. It’s not safe, it’s not ok, and it’s not affordable.

All the housing up here is skewed to women with children – there is no appropriate housing for older women (smaller one or two bedroom units) – just houses. There is no housing up here for older people unless you have been flood impacted in which case you might get a pod, and that’s happening really, really, slowly. People are living in unsafe environments because there’s nowhere else to go.

There’s massive overcrowding and First Nations communities are really struggling. Many of the homelessness workers are homeless. People are living in the mouldy rotting husks of their houses. The community has been great (offering up spare rooms and garages) but you can only live with strangers for so long.

Homeless women who were at the end of the queue and who couldn’t list an address in a flood impacted area are not even in the queue any more. We are helping older women leave the area - to go to Newcastle, Armidale, Brisbane – anywhere they might have friends or family where they can couch surf. It’s really hard for older women with mobility issues.

We can’t get tradies in to rebuild services and housing; there’s a labour shortage and there’s nowhere for them to stay anyway. LAHC hasn’t done any maintenance up here for years so even people with social housing on higher ground are living in mouldy rotting houses as they haven’t been maintained. And it’s getting worse as its getting colder and still raining. It’s heartbreaking. I know older women that are just walking around in a cloud. They are really not mentally well.”

Homelessness Service, Regional NSW 2022

Holistic approaches and flexible services for rapid responses

Early in the aftermath of the disaster, NCOSS joined with the Community Housing Industry Association NSW (CHIA NSW), NSW Aboriginal Community Housing Industry Association (ACHIA NSW) and Homelessness NSW⁸⁵ to call on the NSW Government to fund a significant and immediate housing recovery package to address both the short and long-term impact of the floods across NSW. It was imperative that, in tackling the crisis and the mammoth ‘repair, rebuild and construct’ program required, a coordinated and holistic ‘whole of portfolio’ approach was needed as well as a Housing Masterplan.

Masterplans needed to identify properties across the entire region for repair and relocation, and sites for the extensive new build required to meet demand. Alongside solutions for home-owners, plans needed to identify the repair and growth of social housing, and develop exit options for people in temporary accommodation or other temporary arrangements. They needed to consider relocation of communities where necessary.

While the Resilient Homes program attempted to take this holistic approach it was extremely slow to get started and was not at the scale required to respond adequately. Further work needs to be done

in high risk areas so that when disaster happens they are able to respond rapidly and at scale to house impacted communities in well designed and well located homes.

It was also made clear that the significant role of NGOs in emergency management should be reflected in service contracts, and a mechanism to enable them to be compensated for funds spent during an emergency situation included. Contracts should also allow underspends incurred as a result of the impacts of disaster to be rolled over to the next financial year, and flexibility for organisations to spend this on getting their business back up and running, or meeting increased community demand.

It should be recognised that disasters happen in a ‘ripple’ affect with impacts on housing and services far from the ‘epicentre’ of disaster – as people seek housing and services in regions not directly affected by the particular event/s.⁸⁶

Resilient communities

The piling up of chronic underinvestment in housing and homelessness services, acute housing shortages, and back-to-back disasters in the Northern Rivers area pinpoints the need for timely and targeted responses to homelessness and housing shortages in outer urban, regional, and remote areas across Australia - to prepare communities for a future where extreme weather events and other disasters such as Covid 19 are going to happen more and more frequently, with significant health and mental health impacts.

“More frequent and extended heatwaves and increases in humidity may contribute to increases in mortality, gastrointestinal illness, kidney failure and heart attacks ... There will be increased risk of vector-borne diseases such as malaria and dengue and of food- and water-borne diseases such as cholera, dysentery and trachoma. Heat stress, acute respiratory infections, asthma and other respiratory illness represent additional health and wellbeing risks” (Lea et al p 57)

Sustainable housing, including social and affordable housing, needs to be planned and delivered in the near future for communities most at risk and surrounding regions (so that there is capacity to absorb displaced households in a crisis). Housing needs to be located in lower risk areas, designed to withstand extreme heat and weather, and where necessary, retro fitted with improved thermal protection and/or solar panels and reverse cycle air-conditioning.⁸⁷

Current funding programs including the Commonwealth Household Energy Upgrades, and state social and Aboriginal housing upgrades need to be aligned and expanded, alongside rental reforms, to ensure that all social housing and low-income households across Australia can protect themselves from heat, cold, mould and pollution, save on energy bills and reduce emissions.

We refer the Minister to some key reports and submissions for more detailed discussion of these issues:

- [NSW Independent Flood Inquiry – NCOSS Submission 2022](#)
- [The impact of housing vulnerability on climate disaster recovery: The 2022 Northern Rivers Floods 2022 \(UNSW City Futures Research Centre\)](#)
- [Sustainable Indigenous housing in regional and remote Australia 2021 \(AHURI\)](#)
- [Weathering the Storm: Insurance in a Changing Climate 2023 \(Choice\)](#)

Recommendations

9. Mitigate the devastating impacts of disasters for people experiencing poverty and disadvantage:
 - a. Immediately invest in sufficient social and affordable housing to address critical shortages of appropriate and sustainable housing in high risk regional, rural, remote, and urban areas.
 - b. Proactively equip and resource high risk areas to develop and implement collaborative Housing Masterplans in the immediate aftermath of disasters - bringing together government agencies with local stakeholders including housing organisations.
 - c. Embed and resource place-based NGOs in emergency management systems to improve local emergency planning, responses, and recovery, including the provision of adequate housing, with ACCOs and ACHPs leading service delivery for Aboriginal communities at critical response points.
 - d. Embed disaster management responsibilities in NGO service contracts, including provisions recognising increased responsibility and resourcing where relevant.
 - e. Ensure recovery grants are made immediately available to local Community Housing providers, including ACHPs, and specialist homelessness services to support people made homeless as a result of disasters.
10. Ensure social and affordable housing is fit for purpose in a warming world and does not put the health of low-income households at risk:
 - a. Prioritise the upgrade of inefficient fixtures (water, heating, and cooling) and improve the thermal performance of existing social housing stock.

Additional Issues – Accessible Homes

In 2022 the National Construction Code was finalised to deliver a new liveability standard to increase the stock of homes with accessibility features and support Australians with mobility limitations to navigate various life stages within the comfort of their own homes.⁸⁸ While most Australian state and territories have agreed to transition to the code by October 2023, NSW has not.

Implementing Silver Level Livable design across all jurisdictions, will vastly increase the supply of accessible housing and provide many more living options for people with disability, the elderly and families throughout Australian communities.

Recommendation

11. Provide better housing options for people with disability, mobility issues, families and older people:
 - a. Mandate minimum accessibility standards (Silver Level Livable Design) in all jurisdictions and across all housing types (social, affordable, private) in line with the National Construction Code.

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