



Feedback to the Issue Paper on Housing and Homelessness in Australia

Queensland Aboriginal and Islander Health Council
submission

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Feedback: Housing and Homelessness in Australia

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QAIHC SUBMISSION TO THE DEPARTMENT OF SOCIAL SERVICES

About the Queensland Aboriginal and Islander Health Council (QAIHC)

The Queensland Aboriginal and Torres Strait Islander Health Council (QAIHC) would like to thank the Department of Social Services for providing the opportunity to respond to the National Housing and Homelessness Plan Issues Paper ('the Paper').

QAIHC is the peak body representing the Aboriginal and Islander Community Controlled Health Organisation (ACCHO) Sector in Queensland at both a state and national level. Its Membership comprises of ACCHOs located throughout Queensland. Nationally, QAIHC represents the Community Controlled Health Sector through its affiliation with the National Aboriginal Community Controlled Health Organisation (NACCHO) and is regarded as an expert in its field.

Today, QAIHC represents 33 community-controlled health services and 11 associate members who share a passion for and commitment to addressing the unique health care needs of their communities through specialised, comprehensive, and culturally appropriate primary health care.

Our feedback is based on consultations with QAIHC Member services, experts, and literature. QAIHC acknowledges that despite the efforts that have been made to improve housing conditions and improve health and wellbeing in Aboriginal and Torres Strait Islander populations, housing and lack thereof continues to be a significant issue which we know leads to a high burden of disease. The recommendations and feedback provided in this submission align directly with priority reforms two and three of the National Agreement on Closing the Gap [1].

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1. Opening statement – working towards the National Agreement

Housing and its quality have major implications on people's health and can expose people to several health risks. Improving housing is critical to reducing health risks such as injury, stress, isolation, respiratory, cardiovascular asthma, allergies, infectious disease, and communicable diseases. It is largely acknowledged that health inequity is exacerbated through social and environmental inequalities that includes housing [2].

It has been established that housing is the strongest protective factor against homelessness and people who have owned a home at any point are less likely to become homeless[3]. Additionally, stable accommodation and affordable housing is vital to limit the incidence of young people are less likely to become homeless.

QAIHC is pleased to note the inclusion of Aboriginal and Torres Strait Islander communities as a prioritised focus within the National Housing and Homelessness Plan Issue Paper, aligning with the National Agreement on Closing the Gap [1].

QAIHC would like to support the Paper's findings and references to the following:

- National Agreement on Closing the Gap and ensuring the Plan supports the Priority Reforms.
- Closing the Gap Housing Sector Strengthening Plan.
- Closing the Gap Housing Policy Partnership.
- The recommendations within the Productivity Commission review on Housing and Homelessness Agreement.
- Aboriginal and Torres Strait Islander people are a disadvantaged and vulnerable population and have individual and complex housing challenges.

QAIHC would like to commend the Paper's inclusion of the following:

- Aboriginal and Torres Strait Islander people are a disadvantaged and vulnerable population and have individual and complex housing challenges (1.4).
- Housing assistance for Aboriginal and Torres Strait Islander people needs to be led by Aboriginal and Torres Strait Islander people and the Aboriginal community housing sector (1.4).
- Housing provides better health outcomes and can save lives, prevent disease and increase quality of life (2.1).
- Not-for-profit and community sectors have a significant influence on housing and homelessness and provides a range of supports and services across the housing system (2.3).
- Housing and homelessness require a collaborative effort (2.3).
- Aboriginal and Torres Strait Islander people are around 9 times more likely to experience homelessness (3.1).
- Preventing homelessness before it occurs (3.2).
- Aboriginal and Torres Strait Islander Housing section (3.3).
- Regional and remote Aboriginal and Torres Strait Islander communities are often more vulnerable to climate change impacts (3.7).

Addressing homelessness and overcrowding among Aboriginal and Torres Strait Islander peoples involves recognising its multifaceted nature, which is deeply intertwined with the social determinants of health [4]. This issue is not confined solely to the Northern Territory, as we see frequently referred to in the Paper, more so than the other jurisdictions, but extends across the entire country, hence QAIHC would like to see an increased focus on the issues facing Queensland. Four in 5 Queenslanders identify housing as an issue for their local community.

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Queensland's remote and discrete Aboriginal and Torres Strait Islander communities are grappling with chronic overcrowding, threatening health and education outcomes. It is estimated that over 30% of Aboriginal and Torres Strait Islander people in remote Queensland are living in overcrowded households [5].

Poor housing and homelessness within Aboriginal and Torres Strait Islander communities are the result of a complex interplay of historical and contemporary factors. This includes the enduring impact of colonisation, past government policies, pervasive poverty, challenges related to social and emotional wellbeing, and insufficient preventative measures [4, 6]. This intricate web of interconnected issues has significantly contributed to the housing disparities and homelessness crisis experienced by Aboriginal and Torres Strait Islander communities throughout Australia.

Effectively addressing these multifaceted challenges necessitates a comprehensive and culturally sensitive approach. Such an approach must acknowledge the historical context while actively working toward equitable solutions for Aboriginal and Torres Strait Islander housing and overall wellbeing, recognising this is a nationwide concern, not limited to a specific region.

QAIHC would like to see a stronger focus on the following topics:

1. Homelessness and overcrowding as a consequence of poverty.
2. Increased focus on the health consequences of homelessness and overcrowding such as rheumatic heart disease, trachoma, scabies, disruption of childhood development, poor mental health and wellbeing as well as the exacerbation of family violence, community conflict and the inability to provide children a safe and nurturing home environment [7].
3. The thread of climate change for vulnerable peoples.
4. Breaking the cycle of homelessness among Aboriginal and Torres Strait Islander peoples through a stronger focus on prevention and healing.
5. Strengthening outcomes, accountability and oversight.

2. Recommendations

Recommendation 1: Refine overcrowding measures to more accurately assess housing adequacy. Develop indicators that directly capture the experience of overcrowding, moving beyond density-based measures. This will enable more effective policy responses, better allocation of resources, and improved housing outcomes for vulnerable populations, including Aboriginal and Torres Strait Islander peoples.

Recommendation 2: Foster collaborative multi-agency approaches (both nationally and within each state) to optimise resource allocation and achieve shared goals. By fostering collaborative multi-agency approaches, we can harness the collective expertise and resources of various government departments, promoting synergy and cooperation to efficiently address complex issues and ultimately achieve our shared goals with greater effectiveness and impact.

Recommendation 3: Implement/advocate for a comprehensive, community-driven approach that addresses the root causes of poverty-induced homelessness and overcrowding among Aboriginal and Torres Strait Islander communities. This approach should encompass long-term strategies aimed at poverty alleviation, education, employment opportunities and cultural healing. Acknowledge that this will require an intergovernmental approach, accountability, and partnerships.

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Recommendation 4: Addressing intergenerational poverty through innovative homeownership solutions in communities. This can empower Aboriginal and Torres Strait Islander communities to secure stable housing and build assets, thereby breaking the cycle of intergenerational poverty and fostering economic resilience.

Recommendation 5: Acknowledge that overcrowding is not confined to the Northern Territory, as we see the Northern Territory frequently referred to in the paper but is a pressing issue affecting Aboriginal and Torres Strait Islander communities across Australia. Referring to the Northern Territory more often than the other jurisdictions minimises their needs. Overcrowded housing conditions are a result of systemic poverty, intergenerational trauma, and institutional racism.

Recommendation 6: Prioritise adequate housing infrastructure to address the adverse health outcomes associated with overcrowded housing among Aboriginal and Torres Strait Islander communities. This entails ensuring houses are equipped with basic amenities such as cleaning utilities, fridges, cooking facilities, toilets, baths, and showers. Adequate housing infrastructure can significantly improve living conditions, reduce the spread of diseases, and enhance personal hygiene and dust control (see recommendation 9)

Recommendation 7: Implement comprehensive primordial prevention strategies recognising the critical link between overcrowding, low socioeconomic status (SES), and diseases like rheumatic heart disease (RHD). Effective primordial prevention strategies should target streptococcal infection by addressing household overcrowding and personal hygiene.

Recommendation 8: Address mental health impacts of homelessness and overcrowding. Increased focus on homelessness and overcrowding having severe mental health consequences including increased stress, anxiety, and depression among Aboriginal and Torres Strait Islander individuals and families. Advocate for co-implementation of mental health support programs tailored to the unique needs of those experiencing homelessness and overcrowding. These programs should be community-driven, culturally sensitive, and accessible to ensure individuals can access the care they require.

Recommendation 9: Implement comprehensive climate-resilient housing initiatives to address the significant health risks associated with climate change for individuals living in inadequately insulated housing. This includes improving insulation, roofing, and ventilation to promote energy efficiency and create climate-resilient living spaces. Additionally, promote the adoption of technological advancements in housing such as solar power and battery storage, to create sustainable and energy-efficient homes.

Recommendation 10: Strengthen community engagement and cultural well-being through recognising the profound impact of climate change on the social and emotional well-being of Aboriginal and Torres Strait Islander communities. Embrace Aboriginal and Torres Strait Islander knowledge and leadership in decision-making processes related to climate change adaptation to ensure Aboriginal and Torres Strait Islander knowledge is central in planning and implementing climate-resilient housing initiatives and strategies.

Recommendation 11: Develop and implement a collaborative and culturally relevant housing strategy involving multi-agency collaboration and culturally relevant housing solutions that prioritise prevention and healing. This approach should consider the diverse needs and preferences of Aboriginal and Torres Strait Islander communities and leverage Indigenous leadership in housing design and construction.

Recommendation 12: Consider and implement the specific amendments suggested in Section 7 in this submission. These recommendations will strengthen the Housing and Homelessness Plan's effectiveness in addressing the specific challenges faced by Aboriginal and Torres Strait Islander communities as well as promote their wellbeing. This will also strengthen accountability and oversight of the plan to align with key health promotion policies.

3. Homelessness and overcrowding as a consequence of poverty

As part of Section 3: Focus area.

Housing plays a pivotal role in shaping life outcomes, underscoring the need for overcrowding measures that genuinely reflect housing adequacy. The definition and measurement of overcrowding hold significant sway over funding allocation, housing stock, and family placements in public and community housing. Presently, Australia relies on occupant density-based measures, like the CNOS, which determines required bedrooms based on occupants' demographics. These metrics, used by institutions like the ABS, indirectly gauge overcrowding. To better combat overcrowding, it is imperative to re-evaluate and enhance these measures, ensuring they more accurately capture housing adequacy in policy decisions. Measures should account for differences in social norms and cultures.

The importance of addressing deeper systemic issues that contribute to homelessness and overcrowding should be further acknowledged in this strategy [4, 6]. This empowers communities to take ownership of their healing process and emphasises the role of cultural understanding and sensitivity in creating lasting change. Overcrowded houses often lack basic facilities, leading to deteriorating living conditions. For example, in the community of Yarrabah, located less than 90 minutes outside Cairns, the average house is home to 16 adults, often with no more than 2-3 rooms and lacking basic amenities. Numerous studies have shown a direct link between overcrowding and negative health and education outcomes, which, in turn, perpetuate poverty [8]. To truly address the deep-seated issues associated with poverty, the broader political system must recognise the need for healing and truth-telling to address underlying trauma.

Colonialism disrupted existing Aboriginal and Torres Strait Islander economic structures and replaced them with institutions that disproportionately disadvantaged Indigenous populations[9]. With the colonisation, the disruption of society and policies allowing for financial abuse to be practised, such as the "Protection Acts" allowing whole wages, savings, entitlements, and other monies to be taken by the State, removed the opportunity of wealth-building for Aboriginal and Torres Strait Islander peoples leading to poverty being passed on through generations. To break the cycle of intergenerational poverty and promote economic stability, it is imperative to explore alternative models of finance and homeowner support mechanisms tailored to Aboriginal and Torres Strait Islander communities. Homeownership plays a pivotal role in preventing homelessness and perpetuating ongoing poverty, serving as an asset and long-term investment. Currently, the lack of homeownership opportunities in most communities[10] presents a significant barrier, primarily due to the substantial financial requirements. To address this issue, governments must invest in innovative financing options and take strategic steps to facilitate homeownership within communities. This may involve transitioning from council-owned housing to a model that empowers communities to take ownership of their homes, aligning with the cultural aspirations of Aboriginal and Torres Strait Islander peoples.

4. Increased focus on the health consequences of homelessness and overcrowding

As expansion of section 3.1

Overcrowded houses often lack basic amenities like cleaning utilities, fridges, cooking facilities, toilets, baths, and showers. Studies have linked overcrowding to adverse health outcomes including infections, respiratory problems, gastroenteritis, and skin diseases, significantly impacting physical health [8]. On 9 August 2023, Senator the Hon Malarndirri McCarthy emphasised that RHD is preventable and primarily caused by poor living conditions and overcrowded housing, particularly among low SES populations [11]. Numerous studies have highlighted the correlation between low SES, overcrowding, and RHD [12, 13]. Poverty, household overcrowding, and limited access to healthcare drive RHD, leading to significant morbidity and premature mortality among Aboriginal and Torres Strait Islander peoples living in poverty and overcrowded conditions [13].

To address the above, it is essential to prioritise the provision of adequate housing infrastructure. Adequate housing not only improves living conditions but also serves as a foundational element for better health outcomes. By equipping homes with essential amenities and promoting personal hygiene, we can significantly reduce the risk of infectious diseases. Furthermore, by implementing primordial prevention strategies that target streptococcal infections through improved household conditions and personal hygiene practices, we can effectively mitigate the risk of diseases like rheumatic heart disease [13]. These initiatives align with the broader goal of enhancing the overall health and wellbeing of Aboriginal and Torres Strait Islander communities and breaking the cycle of poverty and illness perpetuated by inadequate housing.

Additionally, addressing the mental health impacts of homelessness and overcrowding is crucial to the holistic wellbeing of Aboriginal and Torres Strait Islander communities. Homelessness and overcrowding create environments of stress and instability that can lead to mental health issues [14]. Recognising these challenges and providing culturally sensitive mental health support is essential to improving overall health outcomes and quality of life for Indigenous peoples and eventually breaking the cycle of homelessness within this population group.

5. Increased focus on the threat of climate change for vulnerable peoples

As expansion of section 3.7

Climate change will significantly impact the health of individuals and communities, particularly those living in inadequately insulated housing or without affordable access to temperature-regulating amenities like air conditioning. These impacts encompass several dimensions:

- Health vulnerabilities: Climate change can exacerbate health vulnerabilities for individuals and communities who lack appropriate housing and climate control, leading to heat-related illnesses, cold-related health issues, or worsening existing health conditions [15].
- Vector-borne diseases: Changes in climate can alter the distribution and behaviour of disease-carrying vectors like mosquitoes, potentially increasing the transmission of diseases such as dengue fever or

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Japanese encephalitis virus (JEV). Additionally, shifts in climate can lead to increased pest populations, affecting both agriculture and public health [15].

- Wildlife and environmental risks: Climate change can alter the prevalence and distribution of dangerous animals, snakes, and marine stingers, posing direct risks to human health, especially in regions with indigenous flora and fauna.
- Human migration: People across Australia may face potential inundation with global mean sea-level rise forcing them to leave their homes [15].

To effectively address these multifaceted challenges, it is crucial to:

- Plan for climate impacts: Develop strategies that anticipate and mitigate health risks associated with climate change, considering the specific vulnerabilities of different populations.
- Housing resilience: Renovate and retrofit existing housing infrastructure to enhance resilience against extreme weather events. This includes improving insulation, roofing, and ventilation to ensure homes are more energy-efficient and capable of withstanding climatic stressors.
- Technological solutions: Promote housing solutions that are not only climate-resilient but also leverage technological advancements. This may involve incorporating solar power, battery storage, and other innovations to create sustainable and energy-efficient living spaces.
- Cultural and social wellbeing: Recognise the profound impact of disconnection from Country and traditional practices on the social and emotional wellbeing of Aboriginal and Torres Strait Islander people. Allocate funding for programs aimed at addressing these social and emotional challenges.
- Adaptation to uncertainties: Uncertainties include future environmental and demographic factors and potential adaptation (and maladaptation) responses, such as living with water or coastal fortification [15].

While Aboriginal and Torres Strait Islander leadership and knowledge should be central to development, implementation and decision-making in this strategy, achieving a balance between wisdom and action is crucial. Evidence-based policymaking and project implementation are essential to drive meaningful change on the ground.

The Strategy should explicitly acknowledge the rights of Indigenous peoples, as recognised in the United Nations Declaration on the Rights of Indigenous Peoples [16]. This includes their right to participate in, contribute to, and enjoy the benefits of economic, social, cultural, and political development. In the context of Australia, this recognition aligns with commitments made through the National Agreement on Closing the Gap [1], which aims to improve the well-being of Indigenous Australians.

The Strategy should ensure Aboriginal and Torres Strait Islander communities benefit from economic, social, and cultural development opportunities while pursuing greater self-determination in the delivery of solutions. This holistic approach means addressing issues of climate change and housing through a cultural lens and actively involving Indigenous communities in the development and implementation of initiatives.

6. Breaking the cycle of homelessness amongst Aboriginal and Torres Strait Islander peoples through a stronger focus on prevention and healing

As expansion of section 3.3

To prevent and break the cycle of homelessness among Aboriginal and Torres Strait Islander peoples, it is imperative to adopt a holistic approach that involves collaboration among the housing system, health system, and other relevant agencies. This approach should prioritise culturally relevant housing solutions that respect the unique needs and preferences of Indigenous communities, recognising that a one-size-fits-all approach is insufficient. Instead, it should emphasise flexibility and cultural sensitivity in housing design and construction. By focusing on prevention and healing within this holistic framework, we can work towards breaking the cycle of homelessness, improving overall wellbeing, and promoting sustainable housing solutions for Indigenous communities. This comprehensive approach recognises housing is inextricably linked to broader issues of health, culture, and community; and by addressing these interconnected factors, we can make significant strides in improving the quality of life for Aboriginal and Torres Strait Islander peoples.

To enhance the efficiency and impact of government initiatives, a collaborative, multi-agency approach is needed. By pooling financial resources from various government departments, we can effectively drive investments towards shared goals and break down the silos that often hinder progress. This approach can maximise the utilisation of resources but also ensures that outcomes are widely distributed, benefiting a broader spectrum of the population. Additionally, it is crucial to re-evaluate reporting mechanisms to make them more relevant and aligned with the overarching goals of these collaborative efforts, ensuring transparency and accountability throughout the process.

7. Strengthening Outcomes, Accountability and Oversight

As part of all sections

We recommend the following amendments and considerations to the National Housing and Homelessness Plan:

- Refer more frequently to Aboriginal and Torres Strait Islander peoples' unique needs, data, and outcomes throughout the entire document to promote awareness and accountability. This will ensure the specific challenges faced by Indigenous communities are consistently addressed and that progress can be measured effectively.
- Refer to Outcome 9 of the Closing the Gap targets more frequently across the paper in addition to the National Agreement on Closing the Gap (2020) and its Priority Reforms. Outcome 9 focuses on improving the housing situation of Indigenous Australians and should be a central reference point in the Plan.
- Prioritise the Priority Reforms of the National Agreement on Closing the Gap and not just support them. The Priority Reforms represent a comprehensive and ambitious agenda for improving the lives of Indigenous Australians and should be actively pursued within the housing and homelessness context.

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- Refer to the **Productivity Commission's** [Draft Report - Review of the National Agreement on Closing the Gap](#) (and its final version if released prior to the Plan's publication) [17]. This report provides valuable insights into the progress and challenges associated with Closing the Gap initiatives and should inform the housing and homelessness strategies outlined in the Plan.
- Include in Section 2.1 the critical impact of housing on reducing the risk of various health issues, including rheumatic heart disease, trachoma, scabies, disruption of childhood development, poor mental health, family violence, and community conflict. By highlighting these connections, the Plan can underscore the fundamental role of housing in addressing health disparities.
- Add into Section 2.1 the importance of secure housing in assisting in fulfilling all the Closing the Gap targets. Secure housing is a cornerstone of wellbeing and should be recognised as an enabler of progress across all the Closing the Gap targets [1].
- Include "culturally unsafe housing" as a contributing factor in the infographic in Section 3.1 of the Plan. Culturally unsafe housing can have a profound impact on the wellbeing of Indigenous communities and should be explicitly acknowledged as a barrier to progress [18].
- Include Aboriginal and Torres Strait Islander data on people sleeping rough in the infographic in Section 3.1 of the Plan. This data will provide a clearer picture of the homelessness challenges faced by Indigenous communities and guide targeted interventions.
- Acknowledge in Section 3.3 that Aboriginal and Torres Strait Islander peoples have higher rates of disabilities and often experience more severe disabilities compared with non-Indigenous Australians which should be considered in new builds and renovations.
- Inclusion of measures of oversight accountability to ensure Aboriginal and Torres Strait Islander Community Control Housing Organisations have the capacity and investment to lead and partner to implement and evaluate the Housing Sector Strengthening Plans [19].
 - QAIHC's experience with the Sector Strengthening Plans of the National Agreement is that community control is not provided with investment to lead or participate in delivering on the Sector Strengthening Plans.
- Ensure equal investment in government participation in Housing Policy Partnerships and Aboriginal and Torres Strait Islander Community Control Housing Organisations' participation in genuine partnerships. Equal investment is essential for fostering true collaboration and ensuring that Indigenous voices are heard and valued.
 - The Australian Government acknowledged this in a statement "A community-controlled organisation implicitly recognises the strength, the expertise and the right to self-determination by Indigenous communities [20]."
- Address institutional racism in housing service and design that impacts Aboriginal and Torres Strait Islander peoples as well as implement measures and consequences for non-compliance. Institutional racism perpetuates housing inequalities and should be actively dismantled.
- Consider a Case Study comparing Queensland's First Nations Health Equity agenda with legislation passed for Hospital and Health Services and its potential application to the housing sector [21]. This case study can provide valuable insights into effective policy approaches.
- Recognise and support Aboriginal and Torres Strait Islander Health Organisations as early prevention, diversion, or rehabilitation points for addressing housing needs and upstream drivers of homelessness. These organisations play a critical role in addressing the holistic needs of Indigenous communities and should be integrated into housing strategies.
- The inclusion of case studies on topics such as the following to set a national standard for increasing awareness and understanding of these areas:
 - The connection with living conditions and RHD;

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- Effects of climate change on the housing of vulnerable peoples;
- The value of addressing prevention and healing for Aboriginal and Torres Strait Islander communities; and
- Strengthening Aboriginal and Torres Strait Islander community engagement and cultural wellbeing.

8. Conclusion

QAIHC acknowledges the importance of addressing housing and homelessness issues among Aboriginal and Torres Strait Islander communities to effectively close the health Gap. We believe the recommendations outlined above will contribute to more effective and culturally sensitive policies and initiatives that prioritise the wellbeing of Aboriginal and Torres Strait Islander communities.

We thank you for considering our feedback, which is offered in the spirit of collaboration and partnership. We are open to further discussions on these matters and look forward to working together to address the housing and homelessness challenges faced by Aboriginal and Torres Strait Islander peoples.

Thank you for the opportunity to provide feedback. Please contact [REDACTED] if you would like to discuss this submission further.

Yours faithfully,

[REDACTED]

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