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National Housing and Homelessness Plan
Department of Social Services
GPO Box 9820
Canberra, ACT 2601

Submitted: *Online*

Relationships Australia's Submission to the National Housing and Homelessness Plan Public Consultation

Homelessness is a deeply entrenched social issue that affects individuals, families, and communities. It infringes upon people's ability to uphold their human rights and live a dignified life, and it limits their access to essential resources and supports to escape this way of life. It is intergenerational and deeply relational. Relationships Australia welcomes the opportunity to make a submission to this consultation.

Relationships Australia's work in the homelessness space

Relationships Australia is the leading provider of relationship support services for individuals, families and communities. We aim to support all people in Australia to achieve positive and respectful relationships.

We are a community-based, not-for-profit Australian organisation with no religious affiliations. Our services are for all members of the community, regardless of religious belief, age, gender, sexual orientation, lifestyle choice, cultural background or economic circumstances.

We offer services around the country that include counselling, family dispute resolution (mediation) and a range of family and community support and education programs.

Relationships Australia does not provide crisis homelessness services. However, we provide a variety of services that engage with individuals and families who are at-risk of homelessness, or recovering from homelessness. Usually, if clients are experiencing primary homelessness when they reach our services, we will provide a warm referral to a homelessness service, as it is difficult (and ineffectual) to provide therapeutic services during times of such crisis. However, these referrals can be limited by the increasing amount of people experiencing homelessness and fewer homelessness services available. To provide people with the help they need, homelessness services need to have fewer people coming through the door. Prevention is essential. The current crisis orientated response to homelessness has many flow-on effects for services such as ours.

This includes services such as:

- Family Advocacy and Support Services
- Men's Behaviour Change Programs
- Aboriginal and Torres Strait Islander programs
- Redress Support Programs
- Disaster Resilience Work

- Out-of-home care support and transition services
- Headspace centres
- Disability services
- Domestic and family violence services, including services for older Australians experiencing elder abuse

Our social connection campaign, [Neighbours Every Day](#), has also worked in the homelessness space to support community development in regional communities and reduce homelessness that results from relocation to cities.

This submission is based on learnings from the provision of these services, comments and insights from practitioners and clients providing and receiving these services, as well as policy insights gathered through our membership of peak bodies with members working directly in homelessness crisis support. This submission is based on guidance from Mental Health Australia policy discussion groups as well as the *Key messages and submission guide* developed by Homelessness Australia (2023).

The Issue

Homelessness and relationship issues

The second most common cause of homelessness in Australia is relationship issues. According to the Australian Institute of Health and Welfare, 28% of people who use homelessness services have experienced domestic and family violence, and a further 5% is the result of another relationship issue (AIHW). 1 in 2 women and children accessing homelessness services have experienced domestic and family violence (AIHW 2021-2). The fastest growing cohort of people experiencing homelessness are women. Women accounted for 80% of the increase in unhoused people during 2021. Children experiencing homelessness is another expanding cohort, 14% of homeless people are aged under 12, and 37% are under 24 (ABS 2023). Relationships Australia also recognises that while these figures are based on those accessing services, many caregivers avoid doing this for fear of their children ending up in the child protection system.

Poverty, homelessness and relationship issues

Poverty is a key driver of homelessness for families and children. In the 2022 financial year, Relationships Australia South Australia reported that 25.5% of our clients were at or below the National poverty line, while 45.1% of our Aboriginal and/or Torres Strait Islander clients were at or below the National poverty line. Relationships Australia has made several submissions in 2023 to inquiries into poverty and the cost of living and will include recommendations to those submissions as an appendix to this submission, as many are relevant.

Trauma and homelessness

Trauma can be both a cause and consequence of homelessness. Trauma has long-lasting effects on all aspects of someone's life. It increases relationship challenges, mental ill-health, substance misuse and lack of employment, all of which are associated with homelessness. Sacred Heart Mission's research found 70% experience trauma before homelessness (O'Donnell et al., 2014). Trauma can also result from relationship break-down, abuse, violence and other relationship concerns. Research found that 90% of people experiencing homelessness experienced childhood trauma (O'Donnell et al., 2014). Complex trauma arises from exposure to multiple traumatic events that are severe and

pervasive. Currently, the experience of homelessness in Australia is traumatising. Sacred Heart found 97% of people experiencing homelessness experienced more than four traumas, while only 4% of the general population have. Recovery from trauma takes time, but is possible. However, in order to begin the journey to recovery, people must have time, support, community and stable and safe housing. While Relationships Australia works with individuals, families and communities to recover from trauma, the cycle of trauma must be interrupted to begin this important work.

The rehousing system is traumatising

Australia has a traumatising rehousing system. In the 'staircase' approach, people are supposed to progress through crisis accommodation to transitional housing, and then move into long term housing. However, a bottleneck in the staircase means many move around the crisis accommodation stage, accessing medium-term accommodation only if they are lucky, and have extremely limited access to long-term housing. Many exit the staircase halfway up, falling back into primary homelessness. It creates a traumatising merry-go round between short-term support and homelessness, with little hope for full recovery. While on this merry-go round they struggle to access other supports, such as those provided by Relationships Australia, and struggle to gain the most from services as they remain caught in cycles of trauma.

Homelessness and loneliness

The experience of homelessness also has long-term effects on relationships. Loneliness and supportive relationships have an inverse association for those who have experienced homelessness. New research shows that people who had experienced homelessness who had supportive, important and satisfying relationships were more likely to feel lonely despite those relationships. Whilst experiencing homelessness, people may prioritise relationships that provide resources and safety over those that assuage loneliness, even after the event (Bower et al., 2023). The experience of crisis significantly changes their relationships to become transaction-driven, a pattern which persists beyond the event of homelessness.

This further entrenches the links between relationship challenges and homelessness and provides evidence of the need for relationship support services as prevention and postvention supports. The parallels between the demographics of Relationships Australia's clients and those experiencing homelessness at growing rates is notable. Relationships Australia is concerned about the increasing complexity of experiences for clients coming through our doors. The proportion of clients at risk of homelessness is increasing across our service spectrum and ironically, while relationship issues are causing homelessness, the experience of homelessness precludes people from accessing effective relationship services to recover from these experiences.

The need to wait for services while a person is moving through the rehousing system can increase the complexity of cases. Once they are in a position to access our services, we find that the complexity and intensity of their needs are such that our resources must be focused on fewer clients due to resourcing limitations. Not only must our practitioners address the presenting trauma, but there are also additional supports needed to overcome the experience of moving through a broken rehousing system. This increases our waitlists and results in increasing complexities for future clients, who are negatively affected by the process of waiting for support. It is a problematic cycle that could be minimised by a reformed approach to homelessness that focuses on prevention and recovery rather than emergency intervention.

Client stories

While there is significant evidence pointing to the impact of homelessness on families and children and young people, older Australians experiencing elder abuse are often left invisible. Practitioners working in elder abuse prevention have noted the growing impacts of population-wide economic stress affecting younger generations especially, and the impact this has on elder abuse.

“Now children are moving back in, they’ve lost their units, they can’t afford to pay rent. They’re moving back in with mum and dad... there is a lot of potential for financial abuse”

- Service manager, older people’s services

“There are changes in adult children moving home as a result of COVID, and parents having difficulty either removing them from the property...or just generally having ongoing difficulties with them because they’re living at home. And they said that they would be there for a short time and they’ve ended up being there for a lot longer”

- Legal professional

Practitioners have noted that following COVID-19, demand for services has increased as a result of adult family members – usually children – becoming financially dependent on our clients. One practitioner suggested that 80% of cases in the elder abuse service were older children moving in as a result of economic stress.

Housing distress is also affecting older people. Australia’s retirement system is predicated on an expectation that older people will own their own home. Our clients are often made to make an impossible decision between homelessness or relying on unsafe family members for housing.

“Homelessness and housing unaffordability for older people...has enormous impacts because it forces people to live in circumstances that [are] not safe, and they would not desire, that is often with other family members or in circumstances where it creates financial stress”

- Strategic manager, government/health service

“If I could fix housing, I reckon I could literally fix – at the moment – 90% of my clients, easy.”

- Practitioner, Relationships Australia¹

While national data suggests that many clients accessing homelessness services are younger, we believe that these figures do not accurately represent the extent of the issue for older Australians. Part of this obscurity stems from a shame associated with the experience and an unwillingness to access services which may jeopardise the relationships they have with their children. Many of our clients would rather stay in unsafe housing situations, or do not have the capacity to access a complex and ineffectual homelessness system. The Australian Institute of Family Studies’ Elder Abuse Prevalence study found that adult children were the most frequent perpetrator of financial elder abuse (33%), suggesting that housing insecurity is most likely to be taken advantage of by adult children (2021: 72-73). Lastly, clients experiencing elder abuse, which is sometimes conceptualised as a form of family and domestic violence, are nevertheless often not eligible for domestic violence

¹ The quotations and client insights were used with permission from RANSW’s [Hidden Gems Report](#), which explores the unique role of collaborative approaches in preventing and responding to the abuse of older people.

shelters and housing services as they do not fit within the target client demographic of women and their children. Sometimes our clients are older men, and their children are the perpetrators.

Recommendations

1. **Have an ambitious goal – the plan must seek to *end* homelessness**

Relationships Australia views the National Housing and Homelessness Plan as a unique opportunity to put an end to systemic homelessness. This document should be bold enough to imagine reforms that put an end to homelessness. Where homelessness cannot be eradicated in its entirety, the goal should be to move towards incidences of homelessness that are rare, brief and not repeated. In their review into the previous homelessness plan, the Productivity Commission described it as “a funding contract, not a blueprint for reform”, which “does not foster collaboration between governments or hold governments to account”. The new plan must do more to envision a brighter future.

2. **Shift rhetoric around homelessness from an individual focus towards one centred on families, communities and recovery**

People experiencing homelessness are often conceptualised as individuals - people who have made ‘the wrong decision’, with little social supports and little hope for the future. Yet the data shows us that those persistently experiencing homelessness are majority women and majority under 25 years of age. 3 in 5 have a mental health issue or have experienced domestic and family violence (AIHW 2022). Others are older Australians, pushed into homelessness by unsafe living conditions. Australia has strong evidence for who is experiencing homelessness, yet myths that blame, shame and stigmatise persist. Homelessness is seen as a problem discrete to the individual, yet the causes and implications spread far wider than the person or family experiencing homelessness. The evidence suggests that homelessness often affects children, young people and families, as well as people facing difficult challenges and life transitions, who have been let down by failures in the system set-up to support them. The plan must address this and work to fix the system. It should use language that reflects the realities of who is homeless, and it should embed lived experience co-design and frameworks to ensure lived experience is at the centre of the plan. The plan must also establish priority groups and establish appropriate supports that respond to these priority groups and their unique needs.

3. **The plan should identify families as a priority group and establish homelessness responses that prioritise maintaining the family unit**

Current responses to homelessness often force families to make difficult decisions between safety and staying together. Models such as the family violence therapeutic intervention services that have been funded following the Royal Commission into Family Violence in Victoria provide specialist support to families and support collaboration across services, sectors and workforces. They centre the survivors and respond to their needs in a way that prioritises keeping the family together. Relationships Australia has also strongly advocated for hub models of care and service delivery. Hub models reduce competitive funding, by bundling funding through collective impact models, rather than fee-for-service. Hubs are shown to be more cost effective, especially in complex cases (Rosen et al. 2010). Hubs also strengthen the interface between services, allow collective goals and visions to be established across the support services and promote joint decision-making and responsibility between providers and clients.

4. The plan should identify older Australians as a priority group

Violence affecting women and their children is deeply bound up in the home. Family violence situations shift the home to become a place of danger, loss of control, and/or neglect. The same is true for older people experiencing violence. The home is often a central asset in a family estate over which financial abuse may be perpetrated. Housing insecurity can increase direct risk of homelessness for older people and can also lead them to provide accommodation to loved ones who may perpetrate elder abuse. Despite this, older people remain invisible in the homelessness system. Unique differences from other forms of domestic and family violence make them ineligible for services and also reaffirm the need for urgent support. Some clients in our elder abuse programs have passed away before resolutions have been reached in their case. More must be done to prioritise older Australians and establish a rehousing system that supports them to live safely, with dignity and maintain the relationships that they consider important. The plan should identify older Australians as a priority group and conduct proper co-design with lived experience voices and services to establish the best practice for responding to this cohort's challenges.

5. The plan should identify people with disability as a priority group and implement the recommendations from the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability

People with disability face multiple barriers to accessing safe, secure and inclusive housing. These include design barriers and a lack of social housing and crisis accommodation. In the Final Report by the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, the Commissioners note that people with disability are conspicuously absent from national housing and homelessness policy frameworks. We recommend the plan consider the recommendations made by the Commissioners. They recommend the proposed National Housing and Homelessness Plan and the National Housing Supply and Affordability Council include people with disability as a priority group in developing reforms. They also recommend:

- focusing on people with intellectual disabilities or cognitive impairment, as a discrete cohort for intensive homelessness support
- implementing a variety of housing design guidelines
- improving access to social housing
- improving housing security
- tenancy reforms
- longer pathways for support out of homelessness for people with disability
- free legal advice on housing matters
- and many other housing and homelessness recommendations.

There are also unilateral recommendations to phase out group homes. If this takes place, significant work must be done to ensure those exiting group homes are not at risk of homelessness.

Relationships Australia supports these recommendations and believes that they must be reflected in the plan .

6. Develop a separate plan for homeless children, or designate them as a priority group within the homelessness plan, with specific responses

Children who are homeless represent a uniquely vulnerable cohort, who have few services that can appropriately respond to their needs. There are incorrect assumptions that children will be supported by the child protection system or access homeless youth services. However, the child protection systems do not always detect children at risk of experiencing homelessness, and youth services are designed for transition into independent living, and therefore are not fit to meet the needs of younger children. Additionally, there is no lead government agency responsible for these children's care. These children need specific supports that range from preventative family support, screening in education institutions and long-term holistic care, with a government body responsible for their timely support (as well as supporting them to live independently once they age out of the child protection system). This will only be achieved through a separate plan or by designating children as a priority group within the homelessness plan.

7. When considering these priority populations, the plan should implement recommendations from previous inquiries and Royal Commissions

"Truth-telling inquiries are motivated by ideas of restorative justice and are intended to address historic abuses by giving survivors a platform to tell their stories" (Tjandra 2022). However, their intentions are undermined by an apparent unwillingness of governments to implement the recommendations in full. Recommendations from Royal Commissions and Inquiries into priority groups must be incorporated to end the cycle of inquiries that do not lead to effective action. Significant evidence has already been provided through these various processes and more must be done to enact the recommendations that have been made. The plan should incorporate recommendations from recent inquiries.² These recommendations can also be supported by co-design which focuses on lived expertise that goes beyond asking people to sharing their story, to produce policies that are created from and with lived experience.

8. The plan should develop a systems approach to ending homelessness

Relationships Australia supports a systems approach to ending homelessness. This requires a shift in the goal of the system (Meadows 1999). Homelessness is not a problem to be managed, but one to be eliminated. The plan should reflect this explicitly.

The plan should also take active steps to promote stakeholder engagement and collaboration, removing barriers and obstacles to ensure that those within the system can create active change. While Relationships Australia does not provide 'homelessness services' as traditionally understood, our service spectrum operates to prevent individuals and families from entering homelessness and supports recovery from homelessness. A systems approach would recognise the role mental health,

² This includes:

- Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability
- Royal Commission into Aged Care Quality and Safety
- Royal Commission into Institutional Responses to Child Sexual Abuse
- Inquiry into the extent and nature of poverty in Australia
- Inquiry into Mental Health and Suicide Prevention
- Productivity Commission's Mental Health Inquiry

Which all directly reference homelessness in their recommendations from final and interim reports

relationships services, domestic violence support, at-risk youth services, migrant and refugee settlement services, climate crisis recovery work and others play as targeted prevention services. The plan should involve policy beyond homelessness service delivery and consider how the current system limits collaboration across the service spectrum, including in housing, welfare, economic and social policy systems.

A good example of cross-sector collaboration is the [Building Stronger Families program](#), an ambitious response from Settlement Services International (SSI) and Relationships Australia NSW (RANSW) to the lack of support for men from refugee and new migrant communities who use violence to address their behaviour. This intervention addressed a key driver of homelessness (domestic and family violence) in communities who are uniquely at risk of homelessness due to visa limitations. Strategic partnership can provide organisations with a unique opportunity to expand their expertise in a new area of practice, and a shared vision supports partnering organisations to work collaboratively and overcome challenges.

A systems approach would shift the focus from temporary and emergency accommodation, to providing a Housing First policy. This will create a structural and operational shift from managing homelessness to one that seeks to eliminate homelessness. This works across government levels and has a long-term horizon to create change.

9. The plan must have a Housing First Policy focus

Housing First is now recognised internationally as the most successful model to end homelessness for people with high support needs who have experienced long term or recurring homelessness (Homelessness Australia 2022). We suggest referring to the Homelessness Australia principles which were adapted from those used in the United States, Canada, Europe and England (2022).

10. The plan should have clear timelines

Relationships Australia believes that rather than simply articulating the problem of homelessness, the National Housing and Homelessness Plan should outline ambitious timelines to end homelessness. This would involve setting targets and timelines for reducing homelessness, and ultimately ending homelessness.

11. The plan should establish robust definitions and responsibilities

The plan should also outline who is responsible for its implementation. The plan must consider all policy and programs across all levels of government that have an impact on the level of homelessness. We consider the plan could be enhanced by clearly articulating how governments will be accountable for effective collaboration across jurisdictions and portfolios within jurisdictions. It should also provide definitions of affordability, safety and sustainability. Again, we refer to leaders in the sector, such as Homelessness Australia, Mental Health Australia and others for their views on this matter.

12. The plan should recognise the human rights implications of allowing the homelessness system to continue operating in its current state

The Australian governments must recognise the human rights implications of homelessness. To produce another ten-year plan that does not improve upon the current system by working to end homelessness is not only a lost opportunity, but a continuation of a system that violates people's

human rights, including the right to live a dignified life. While we recognise that homelessness is an entrenched social issue, that is very challenging to address, the National Housing and Homelessness Plan is a unique opportunity to put an end to systemic homelessness through the aforementioned recommendations.

Closing Comments

Thank you for your consideration of this submission. Should you wish to discuss any aspect of it, or the services that Relationships Australia provides, please do not hesitate to contact [REDACTED]

Kind regards

[REDACTED]

[REDACTED]

Relationships Australia

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Appendix

Recommendations included in previous submissions on [poverty](#) and the [rising cost of living](#)*Responding to poverty, and risks of poverty, through a human rights lens*

1. That Australian governments recognise the human rights implications of poverty, and that it is caused by the interplay of systemic and environmental factors.
2. That the Australia Government repeal the *Social Security Act 1991* (Cth), and associated legislation, and replace it with new legislation that centres human rights, including by expressly incorporating into domestic law the rights articulated in the International Covenant on Economic, Social and Cultural Rights. New legislation should come into operation no later than 1 January 2025.
3. That the Australian Government:
 - a. express its support for and commit to working towards the adoption of a United Nations Convention on the Human Rights of Older Persons
 - b. ensure the involvement of civil society organisations in the drafting, designing and negotiation of the instrument, particularly organisations that represent older persons and diverse communities of older persons
 - c. engage with the Human Rights Council, the Open-ended Working Group and other relevant bodies to urgently move forward the agenda for drafting and adoption of a new treaty on the human rights of older persons, and
 - d. support the Australian Human Rights Commission's involvement in the discussion concerning a future convention on the rights of the older persons, both at the international and at the domestic level.³
4. That Australian governments prioritise universal access to services for co-morbidities, including low cost high impact interventions to facilitate social connection, address loneliness, and overcome economic barriers to acquiring social capital; accordingly, we urge the Australian Government to implement the recommendations made in our pre-Budget submission for the 2023-2024 financial year, which can be accessed at <https://relationships.org.au/what-we-do/#advocacy>.

Implementing the recommendations from the 2020 Newstart inquiry

5. That the recommendations made in this Committee's 2020 Report on the adequacy of Newstart and related matters ought to be fully implemented, to the extent that this has not occurred, noting also and in particular that:
 - a. Australia does not yet have a clear and consistent definition of poverty (see Recommendation 1 of the 2020 Report)
 - b. while there have been recent and welcomed initiatives to support people on low income to find stable, secure and safe housing, there is increased urgency to implement Recommendations 3 and 4 from the 2020 Report, given that housing scarcity continues to worsen since the 2020 Report

³ This recommendation reflects the call to action made by Rights of Older Persons Australia (ROPA), of which Relationships Australia is a member. ROPA is comprised of those civil society organisations, individual supporters and advocates who publicly endorse a new UN Convention on the Human Rights of Older Persons. See <http://www.rightsofolderson.org.au/>.

- c. health inequalities, including lack of access to preventive and otherwise timely health care interventions, heighten risks of:
 - i. poverty for individuals and families
 - ii. reduced education, employment and community participation, and
 - iii. increased calls on social security and other taxpayer-funded services (see 2020 Report, especially Recommendation 6)
- d. despite extensive international evidence linking dental health to poor health, employment and social outcomes, dental care continues to be arbitrarily excluded from Medicare, putting it out of reach for many people⁴ (see Recommendation 7 of the 2020 Report)
- e. while there have been recent and welcomed initiatives to improve supports available to people experiencing domestic and family violence, further work needs to be done to ensure that:
 - i. supports *and* compliance activities are trauma-informed *and* domestic and family violence informed,⁵ and
 - ii. victim-survivors (including children) can stay in place, by removing barriers to perpetrators moving out (see 2020 Report, especially Recommendation 8)
- f. contracts with employment services focus on genuine and enduring outcomes for clients and discourage tokenistic, 'tick a box' and volume-based remuneration outputs (see 2020 Report, especially Recommendation 14)
- g. the Australian Government works with employer groups to reduce the social, economic and budget costs of disability, as well as age, discrimination (see recommendations 17 and 18 of the 2020 Report; see also the AHRC Willing to Work Report, 2015)
- h. further policy and programme work needs to be done to ensure that older people are not at heightened risk of poverty before they are eligible for the Age Pension (see 2020 Report, especially Recommendation 19)
- i. digital exclusion of school children can have lifelong impact on social, educational, employment and health outcomes (see 2020 Report, especially Recommendation 20), and
- j. any social security system expert group include people with lived experience (see 2020 Report, especially Recommendation 25).

Additional recommendations for specific cohorts and communities

- 6. That Australian governments collect data on the prevalence, drivers and characteristics of poverty, as well as mechanisms and conditions for its alleviation, among Aboriginal and Torres Strait Islander people, and in remote communities.
- 7. That the Australian Government legislate to pay the superannuation guarantee contribution for carers, in recognition of the costs that carers save the taxpayer.⁶
- 8. That this Committee undertake an inquiry into how best to support care leavers at all ages.

⁴ See World Health Organization, 2022; AIHW, 2022, Oral health and dental care in Australia.

⁵ For how compliance activities can re-traumatise people who have experienced domestic and family violence, see Klein et al, 2021, especially p 57.

⁶ See also Evaluate, 2022.

9. That the Australian Government recognise the long-term financial effects of domestic and family violence by allowing victim survivors of domestic and family violence offences to:
 - a. be awarded an amount from their perpetrator's 'additional' contributions for the purposes of satisfying unpaid compensation orders, as proposed in relation to victim survivors of child sexual abuse in Treasury's 2023 paper,⁷ and
 - b. submit a superannuation information request to the appropriate court which could then request that the ATO discloses specific information regarding the offender's or their spouse's superannuation accounts.

⁷ Treasury, 2023, *Access to offenders' superannuation for victims and survivors of child sexual abuse*, available at <https://treasury.gov.au/consultation/c2022-353970> [accessed 27 January 2023]