



SUBMISSION

TO | Department of Social Services

TOPIC | Developing the National Housing and Homelessness Plan Consultation

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CONTACT

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Submission to the Department of Social Services' Developing the National Housing and Homelessness Plan Consultation

Key recommendations

Uniting Communities thanks the Australian Government's Department of Social Services for undertaking a comprehensive consultation to develop a National Housing and Homelessness Plan (NHHP).

Australia is in the midst of a housing crisis, and we acknowledge that low-income earners are disproportionately impacted by significant housing challenges. The new NHHP provides us with an opportunity to focus on improving access to housing and decreasing the rates of homelessness across Australia. National consistency in the provision of housing policy and homelessness services is vital for successful outcomes in Australia.

We recommend that the new National Housing and Homelessness Plan (NHHP):

1. Acknowledges that specialist homelessness services (SHS's) experience an excessive number of referrals from people seeking support and recommends that the eligibility criteria for SHS's is re-evaluated to ensure that those with the most complex needs are provided with appropriate levels of specialised support.
2. Identifies ways to capture unmet need for the growing cohort of people not able to access support from a SHS.
3. Recognises the need to urgently increase the amount of available, affordable and accessible housing stock.
4. Recommends that alternative measurements of success for the SHS sector are developed (in collaboration with SHS's)
5. Supports the identification and additional resourcing of early intervention and prevention services to ensure dedicated services are established and federally funded to prevent people from entering the homelessness system and requiring the support of SHS's.
6. Suggests that SHS's are well resourced to provide holistic wraparound support for clients to ensure repeat episodes of homelessness do not occur.
7. Outlines ways to improve the affordability, security and safety of renting in Australia by introducing reforms to improve energy efficiency of homes, limiting rent increases to CPI, removing no cause evictions (for the end of a fixed term agreement and during a periodic lease), properly banning rent bidding, appropriately indexing Commonwealth Rent Assistance and improving enforcement of residential tenancies laws.

About Uniting Communities

We are an inclusive not-for-profit community service organisation working alongside more than 80,000 South Australians each year and have been creating positive change for South Australian communities for more than 120 years. We advocate for systems change across diverse social justice issues to shape public and social policy that delivers better outcomes for marginalised communities.

Uniting Communities provides several services for people who are experiencing, or at risk of experiencing, homelessness. The [Homeless Connect SA Service](#) is a 24/7 state-wide free call service that operates as a gateway to the specialist homelessness services in South Australia. Homeless Connect aims to link people to relevant services and to provide short-term assistance until a referral to a specialist homelessness service can be made. We have experienced a 17% increase in the number of calls to our service in the last 12 months.

The [Ruby's Reunification Program](#) helps to keep families together and prevents young people from entering the homelessness sector. The program does this by supporting young people and their parents or caregivers to resolve conflict and improve relationships. We also welcome young people who are currently not at home, but would like to find a way to return by providing:

- A safe place for the young person to stay, spending some nights at Ruby's and some at home where appropriate
- Family counselling
- 24-hour therapeutic support
- Access to tailored services for families.

“Things are much better at home now – I’m much happier there. Ruby’s really helped us get back on track.” Ruby’s client.

Additional information about Uniting Communities’ Ruby’s Renunciation Program is detailed on page 5 of this submission.

We operate [Reconnecting Families – Reconnect \(Salisbury\)](#) which supports young people who are experiencing homelessness or at risk of experiencing homelessness in the Salisbury area. Our focus is on intervening early to reunify families through counselling, as well as connecting young people with education, training, work and their wider community.

Our [Kurlana Tampawardli](#) service provides short-term crisis accommodation for those visiting Adelaide from a rural area and are at risk of sleeping rough. We also support tenants of the South Australian Housing Authority (SAHA) who are experiencing overcrowding in their home. Part of the Kurlana Tampawardli service is helping people to return to country using ‘safe tracking’. This service supports people who have been sleeping rough or living in crowded housing in Adelaide and wish to return home. Kurlana Tampawardli is Kurna for ‘new house on the plains’.

We have responded below to questions from the Issues Paper that relate to our experience and expertise as a specialist homelessness not-for-profit service provider.

Additional comments

Focus Area

Homelessness and Homelessness Services

What are the different challenges for people experiencing homelessness in urban, regional, and rural areas?

A significant challenge for people experiencing, or at risk of experiencing, homelessness in regional and rural areas is the disparity in service provision compared to urban areas. This includes access to specialist homelessness services as well other specialist wraparound services such as mental health services. A lack of specialist homelessness services and a

decrease in housing supply (both social housing and private rentals) has caused significant challenges for rural and regional communities.

How can the homelessness system more effectively respond to those at risk of, or already experiencing homelessness?

Defining the role and responsibilities of specialist homelessness services

As an experienced provider of specialist homelessness services (SHS), we acknowledge that there is a vast continuum of different types of homelessness that people can experience. However, there are two unique cohorts of people experiencing, or at risk of experiencing, homelessness that continue to seek our assistance.

- 1) **People that require housing** due to their current accommodation option ending (for example the property owner wants to move back into their rental property and does not renew the tenant's lease agreement). Due to the lack of available and affordable accommodation options for these individuals and families, they find themselves experiencing, or at risk of experiencing, homelessness. These families will often have secure employment and do not necessarily require ongoing therapeutic case management from a specialist homelessness service. Urgently increasing the amount of available, affordable and accessible housing stock is required to support this cohort of individuals and families. This group would also benefit from the establishment of dedicated early intervention and prevention services (that are federally resourced) to prevent them from entering the homelessness system and requiring the support of SHS's.
- 2) **Chronic homelessness** – There are some families and individuals that seek the support from a specialist homelessness service to secure accommodation **and** to assist them to address the reasons why they are experiencing, or at risk of experiencing, homelessness. Specialist homelessness services are expected to provide intensive case management support to families and individuals to assist them to address the barriers that are preventing them from maintaining secure and safe accommodation.

Many people presenting to specialist homelessness services from the first cohort detailed above can afford to pay for motel accommodation (in the short term), fund a short stay in a holiday rental or stay with family or friends until a longer-term solution is identified. There are minimal support services available for this cohort of people. Uniting Communities have seen an increase in the number of people from this cohort calling our Homeless Connect Service.

Specialist homelessness services are skilled at supporting people experiencing, or at risk of experiencing, chronic homelessness (people with high needs). It is recommended that the new NHHP clearly articulate the continuum of homelessness and outline clear recommendations regarding the eligibility criteria for access to a specialist homelessness service. This has remained a constant challenge for specialist homelessness services and due to limited resources, it is not possible for specialist homelessness services to provide support for all people that are experiencing, or at risk of experiencing, homelessness.

Dedicated support for those that are not experiencing, or at risk of experiencing, chronic homelessness, should also be available, however this service may not need to be provided by a SHS. We recommend that additional early intervention and prevent tenancy services are established and federally funded to address this specific group to prevent them from potentially

becoming chronically homeless. A tenancy support service could work with tenants to maintain their tenancy (e.g. find support to pay their rent or make repairs to damages) or find another appropriate property. Further consideration of this issue will support the creation of a broad range of services to address this current unmet need.

Chronic homelessness – addressing the root cause

Addressing chronic homelessness is dependent on effective wraparound support. For cases of chronic homelessness often the individual is experiencing other challenges affecting their health such as mental health issues or substance misuse that impacts their ability to maintain secure housing. The underlying issues contributing to chronic homelessness must be addressed by not just providing housing/accommodation for people but also by providing access to support services such as health, mental health and alcohol and other drug services. This can prevent clients from falling back into chronic homelessness and stop the cycle.

How we measure success needs to change

Defining and measuring successful outcomes is a critical component of the specialist homelessness sector. It is imperative that services clearly demonstrate their effectiveness. Historically, Federal and State Governments have appeared to measure the success of the SHS sector by the reduction in the number of people receiving support from the SHS sector. It was thought that a reduction would highlight the SHS's effectiveness, however it does not take into account population growth and other factors. Importantly, success looks different for each service and is dependent on numerous factors including the location of the SHS, the financial resources allocated to the SHS, the availability of other local specialist services and individual client circumstances.

There are countless reasons why people seek assistance from a SHS. It is now widely recognised that Australia is experiencing a housing crisis and that this is just one of the systemic barriers that can lead to individuals and families experiencing homelessness. We recommend that alternative measurements of success for the SHS sector are developed (in collaboration with SHS's) and are embedded into the new NHHP.

Increased financial resourcing

It is essential that the NHHP highlights the importance of allocating funding to SHS's that support people experiencing, or at risk of experiencing, chronic homelessness as well as allocating funding to evidence-based early intervention and prevention services. Many services are funded to provide early intervention and/or prevention support to, however due to a large number of referrals from people seeking support that are experiencing an immediate crisis there are limited resources available to undertake this additional work. It is essential that resources allocated to SHS's are increased as well as additional resources allocated to stand alone early intervention and prevention services. The new NHHP must:

- Ensure services have the capacity and resourcing required to improve responses to addressing homelessness
- Support the allocation of additional resources for early intervention and prevention services
- Ensure that all Federal and State Government departments commit to playing a role in addressing homelessness.

What are the best specific early intervention approaches to prevent someone becoming homeless?

The best early intervention approaches focus on holistic wraparound supports for clients. Identifying and working to resolve the root cause of a client's situation can lead to more successful outcomes.

An example of an evidence-based early intervention approach is Uniting Communities' **Ruby's Reunification Service**:

This service supports young people aged 12-17 years (who are homeless or at imminent risk of homelessness) and their families, who are experiencing conflict and relationship breakdown. When a family engages in Ruby's, they are supported by a team of staff who provide wrap-around support that is available 24/7. Ruby's is staffed by a Coordinator, Counsellor and qualified Therapeutic Youth Workers who work together with each family.

Ruby's is a unique service model because it utilises a combination of family counselling while simultaneously providing a safe place for young people to stay part-time while the family work through their issues without the added pressure of living together. While there are many service models that provide support and counselling to this cohort, the addition of safe accommodation enables Ruby's to provide holistic support which greatly adds to the effectiveness of the service.

In collaboration with the South Australian Department of Human Services, we conducted an analysis to look at the long-term outcomes of Ruby's clients. The data included clients aged 12 to 17 years old who used the service between 2014 and 2018.

After engaging with our Ruby's service, an astonishing **89.8%** of young people who had exited the program during these years had never re-presented to a homelessness service in South Australia.

Ruby's highlights the importance of early intervention and holistic support. Without the counselling component, Ruby's would merely act as a respite service because the issues the families are experiencing are not being resolved. Wraparound support is crucial for effective early intervention.

How can governments capture better evidence on hidden or 'invisible' homelessness (e.g. couch surfing, living in a car and overcrowding)?

The SHS sector can improve data collection to better identify unmet need, specifically the cohort of clients that do not qualify for services but require support. Some of these clients include people experiencing hidden or 'invisible homelessness' such as couch surfing. Currently data collection is very reactive and exclusively focuses on collecting and reporting on clients accessing services.

In addition, the current data provided by the SHS's to the Federal and State Governments doesn't include any qualitative data that details the circumstances that led to the person experiencing, or being at risk of experiencing, homelessness or what aspects of the support they received they found most beneficial. A more wholistic reporting and data collection system should be implemented that is funded by the Federal and State Governments to ensure there is nationally consistent data. This would also assist to inform early intervention and prevention strategies across Australia.

From 1 January 2023 to 30 June 2023, our Homeless Connect SA Service received 119 calls where the caller was not eligible for support from a specialist homelessness service due to income eligibility, but still reported either experiencing, or being at risk of experiencing, homelessness in the coming months.

Is the Canadian National Occupancy Standard (CNOS) measure of overcrowding, and the way it is applied in Australia to define homelessness, suitable for the Australian context?

Consideration could be made to redefining both overcrowding and severe overcrowding to account for various circumstances. The current CNOS bedroom criteria recommends that single household members 18 years or older should have a separate bedroom, as should parents or couples. This may not be realistic for some circumstances. As noted in the issues paper, CNOS is based on Western cultural norms and may not be as applicable to some key groups, such as migrants, overseas students and Indigenous people. Importantly CNOS does not take into account large families where 1 adult per room is not possible for some properties.

What strategies can be used to build awareness of available services and supports for people who are at risk of homelessness or experiencing homelessness?

If awareness raising campaigns were to be developed and widely publicised, then it would be crucial that additional resources were provided to SHS's to support them with the likely increase in demand.

The primary focus of the new NHHP should be on clarifying the role of existing services, adequately resourcing them for the demand they face and introducing additional early intervention and prevention homelessness services.

Social Housing

What is the role of social housing for low-income Australians

The private rental sector is becoming increasingly unaffordable for low-income Australians. There is an increased amount of people that are unable to find a rental property they can afford and require social housing. The number of social housing dwellings in South Australia has significantly dropped over the past couple of decades despite the need for social housing rising.

Quality of social housing stock and energy efficiency measures

There is a great need to address the current quality of social housing stock as well as improving maintenance standards. This will not only improve the health and wellbeing of tenants but also ensure the longevity of the housing stock (supply) by preventing further deterioration and the premise becoming unliveable in the future.

Greater funding to accelerate energy efficiency measures (including improvements to ceiling insulation and draught protection), solar, and energy storage in community housing and public housing properties will benefit communities for generations to come.

How can social housing providers better support people with complex needs (such as people with disability, people from culturally diverse backgrounds and people with mental health, alcohol and other drug issues)

Currently some tenants, residing in either public or community housing, with alcohol and/or other drug challenges are unable to retain their tenancy when entering a residential rehabilitation facility. This is an issue experienced by clients in Uniting Communities' New Roads program (an alcohol and other drug treatment service).

In order to access our residential rehabilitation program some clients are expected to forfeit their existing tenancy agreement. Rehabilitation programs require paying rent to the residential facility (an average stay can last between five to eight months) and many clients cannot afford to pay rent to the rehabilitation facility as well as to their existing accommodation provider. Therefore, they either cannot access this vital support or they access the support service but forfeit their secure housing and are at risk of experiencing homelessness following their treatment.

Planning, zoning and development

How can governments work together to be more responsive and flexible to housing demand pressures, both now and in the future?

Planning

We recognise the need for national consistency around planning regulation to help fast-track new developments with a higher minimum affordable and social housing commitment. Incentives need to be developed to build more affordable housing by reducing some of the barriers created by current processes and timeframes. This includes a preparedness to increase housing density levels in established zones to avoid further driving housing to urban fringes with limited infrastructure and impaired transport and other access challenges for residents.

The Private Rental Market in Australia

How can flexibility, accessibility (particularly in the physical environment), affordability and security be improved in the rental private market, particularly for low-income earners?

An important part of addressing the housing crisis and decreasing homelessness is supporting people currently in private rentals to remain in their home. This is achieved through policy reform that focuses on improving the affordability and security of renting. For many, renting is no longer a steppingstone to homeownership but a destination. As such, residential tenancy laws must be suitable for long-term housing.

Rent increases

Rent increases should be limited to the Consumer Price Index (CPI) to ensure rent is not being increased unreasonably. This reform is essential to improving the affordability and security of the rental market.

New Australian Bureau of Statistics (ABS) data, reveals that larger rent increases are becoming increasingly more common in Australia. For existing tenants, only 1.7% of rent

increases were over 10% in June 2019 compared to 24.9% in February 2023.¹ This data highlights a massive shift in the degree of rent increases in Australia.

Rent bidding

Rent bidding is a common issue in South Australia. The introduction of *the Residential Tenancies (Protection of Prospective Tenants) Amendment Act* in South Australia, although welcome, fails to address the root issue of rent bidding which is the ability for landlords to 'accept' higher offers from prospective tenants. Prospective tenants who can afford to offer more rent are given an unfair advantage over lower-income tenants. Rent bidding drives up the prices of rental properties.

No cause evictions

Fixed term contracts are the primary rental agreements; however, these contracts are usually for a short period such as 6 month or 12-month contracts, even when the tenant has lived in the property for years. Landlords can evict a tenant for no reason at the end of a fixed term contract and during a periodic lease. This creates a significant barrier for tenants to have security of tenure. Retaliatory evictions following a request for a repair or issue in the property have been reported by tenants. As a result, tenants can remain silent about vital issues with the property out of fear of not having their lease renewed, including issues that create unsafe and unhealthy housing.

In the current market, tenants who are evicted face the prospect of homelessness as they may not find another property they can afford. Evictions thus threaten the safety of the tenant and should only be allowed for legitimate reasons.

Legislating minimum energy efficiency standards

All rental accommodation should be required to meet minimum energy efficiency standards (e.g ceiling insulation standards and draught protection). Renters should be protected from substandard accommodation and ensured of minimum levels of thermal comfort and energy efficiency.

Despite the substantial increase in the cost of rental housing, the standards of rental homes have not improved. National research highlights that rental housing has insufficient energy efficiency that leads to homes that are too hot in summer and too cold in winter.² Extreme cold and heat conditions are known to have significant adverse health impacts. Cold homes pose serious health risks including illnesses such as asthma and cardiovascular conditions.³

In addition, it costs tenants considerably more to heat and cool energy inefficient homes, often with little results as homes do not retain the heating or cooling. Consequently, some tenants are choosing to turn off heating and cooling appliances as the bill is too high.

Countless rental properties do not have fixed heating or cooling appliances as this is not mandatory in most states. It is unrealistic to expect tenants to afford to heat and cool their homes with portable appliances. Not only do portable appliances cost more to operate than fixed appliances but when used in energy-inefficient homes, the bill is considerably higher. Rental properties should have minimum fixed air-conditioning and heating requirements, that are energy efficient.

¹ <https://www.abs.gov.au/statistics/detailed-methodology-information/information-papers/new-insights-rental-market>

² <https://dataverse.ada.edu.au/dataset.xhtml?persistentId=doi:10.26193/IBL7PZ>

³ Barlow et al. 'Cold homes in Australia: Questioning our assumptions about prevalence,' 2023, <<https://www.sciencedirect.com/science/article/pii/S2214629623001846>>.

Uniting Communities supports the Healthy Homes for Renters Community Sector Blueprint that outlines a framework for implementing minimum energy efficiency standards in rentals across Australia.

Enforcement/implementation

Legislation is only as effective as its enforcement. Rental housing is an essential service to 30% of the population but does not have effective regulation in place to ensure compliance. There is currently no national consistency for enforcement of residential tenancies law. In South Australia the current system relies on tenants applying to the South Australian Civil and Administrative Tribunal if the landlord is not following the law. Not only can this option be a costly and lengthy process for tenants, but it can also place tenants in a vulnerable position to face repercussions from the landlord such as a rent increase, a retaliatory eviction or a poor review about them on a tenancy database.

Government departments must be resourced to actively enforce legislation, including penalties for non-compliance.

Commonwealth Rent Assistance

The 15% increase to the Commonwealth Rent Assistance (CRA) maximum rate this year was an important and welcome measure introduced by the federal government. Further reforms could be implemented to improve the effectiveness of CRA by indexing the payments to average rental prices instead of general inflation to ensure its sustained value.⁴

Conclusion

The new NHHP provides an exciting opportunity to outline an advanced shared understanding of homelessness and housing policies and to develop nationally consistent evidence-based solutions.

It is essential that this plan details how the commonwealth, state, territory and local governments will work together with all stakeholders to address housing supply and affordability challenges.

We know that the Housing First model is highly effective, however this model cannot be applied without an immediate increase in housing supply. We also know that for many, the provision of housing alone does not address the myriad of reasons that led them to experience homelessness and it is critical that specialist homelessness services are well resourced to provide supports to ensure that tenancies are successfully retained.

Access to safe and secure accommodation is a basic human right and it is imperative that all Australians have somewhere to call home.

⁴ <https://www.anglicare.asn.au/publications/reforming-rent-assistance/>