



20 October 2023

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

Submission to Developing the National Housing and Homelessness Plan in Australia

Women in Super has prepared this submission in response to the call for submissions by the Department of Social Services.

WOMEN IN SUPER

Women in Super (WIS) is a national advocacy and networking group for women employed in the superannuation and wider financial services industries. WIS advocates to improve women's retirement outcomes and access to superannuation. We advocate for holistic legislative change – we know that no one policy setting can be altered to deliver financial security for women. Instead, we need multiple reforms across the system to address this issue and ensure that future legislative changes won't disadvantage women in the way our current system does.

OVERVIEW

The women of Australia should rightly expect to enjoy a retirement where they have access to both a secure roof over their heads and an adequate retirement income. They should not be forced to choose between these. To deliver this for future generations of retired women, governments must improve access to housing by addressing housing supply, and prioritise addressing gaps in retirement policy that disadvantage women. Our submission contains some priority recommendations in these areas.

We recommend:

1. Continue working to address housing supply, including through the initiatives contained in the Housing Accord.
2. Prioritise measures to improve women's financial security in retirement, by:
 - Aligning the Low-Income Super Tax Offset (LISTO) eligibility with PAYG thresholds and the LISTO rate with the superannuation guarantee rate.
 - Extending the superannuation guarantee to the Government's Parental Leave Pay scheme.
 - Exploring and implementing a Carers Credit framework in Australia's retirement income system.

HOUSING AND HOMELESSNESS IN AUSTRALIA

Having appropriate, affordable, and secure housing has huge benefits, both for individuals and society. These benefits include improved productivity and better economic and physical and mental health outcomes. However, there are currently significant barriers to accessing appropriate, affordable, and secure housing in Australia. There are barriers in terms of accessing specialist homelessness services (SHS), social and affordable housing, and home ownership. There are currently various difficulties in accessing homelessness services due to underfunding, understaffing, and a lack of specialised services.¹ Stuff from IP. Social housing is often of poor quality, there are long waiting lists, lack of choice (e.g., location), and unsafe.² Australia is in the midst of a housing crisis, with rental affordability at its “worst levels in nearly a decade” and purchase affordability also poor.³ The Government has taken various measures to address the problems, largely through increasing funding for the delivery of homelessness services and social and affordable housing. They have also addressed homeownership and affordability through various policies.⁴

TAKING A HOLISTIC APPROACH AND GENDERED LENS

While these are positive steps, these problems are still pervasive, and much work still needs to be done. Additionally, there is significant evidence for the gendered nature of housing insecurity and homelessness.⁵

Home Ownership, Renting, and Social and Affordable Housing

- Women are less likely to own a home – and when they do, it is often at a later age than men and in a cheaper house.⁶
- Women are more likely to:
 - Struggle to pay their mortgage if they own a house.
 - Rent privately.
 - Live in social housing.⁷

¹ [Specialist Homelessness Services Annual Report 2021–22](#), Australian Institute of Health and Welfare, 2022; [Developing the National Housing and Homelessness Plan – Issues Paper](#), Department of Social Services, 2023.

² [Glass Ceilings: Gendered Inequality in the Housing System – The Australian Housing Monitor, Report 2](#), Centre for Equitable Housing, Per Capita, 2023; [Reforming Social Housing: Financing and Tenant Autonomy](#), Michael Potter, 2017.

³ [Housing Affordability Report](#), ANZ and CoreLogic, 2023; [Australia's Housing Crisis- Uncovering The Real Causes](#), PEXA and Longview, 2023.

⁴ [Developing the National Housing and Homelessness Plan – Issues Paper](#), Department of Social Services, 2023.

⁵ [Glass Ceilings: Gendered Inequality in the Housing System – The Australian Housing Monitor, Report 2](#), Centre for Equitable Housing, Per Capita, 2023.

⁶ Ibid.

⁷ Ibid.

Homelessness and Homeless services

- Whilst men are more likely to experience homelessness in Australia (56% of the homeless population)⁸, women experience unique difficulties with homelessness.
- Women are more likely to experience ‘hidden’ homelessness (e.g., staying with friends or in their car).⁹
- Women’s homelessness is increasing – “Women accounted for 82% of the increase of people experiencing homelessness between 2016 and 2021”.¹⁰
- Older women are especially vulnerable to homelessness.
 - Around 405,000 women aged 45 and older are at risk of homelessness.¹¹
 - Women aged 55 and over were the fastest growing homelessness cohort between 2011 and 2016.¹²
- “Women are more likely to access specialist homelessness services than men”, with 6 in 10 people accessing homelessness services being women.¹³
- 65% of unassisted requests (person receiving no assistance when requesting help from a specialist homelessness service) were from females.¹⁴

Contributing factors to housing insecurity and homelessness

- Many factors contributing to housing insecurity and homelessness disproportionately affect women, including family and domestic violence (FDV), unaffordable housing, low incomes, trauma, natural disasters, and mental ill-health.¹⁵
- Women make up the majority of clients presenting to SHS with mental health issues, experiencing FDV, and/or are over 55.¹⁶

⁸ [Developing the National Housing and Homelessness Plan – Issues Paper](#), Department of Social Services, 2023.

⁹ [Hidden Homelessness Research](#), Single Homeless Project, n.d.

¹⁰ [What are the Real Costs of Australia’s Housing Crisis for Women?](#), Australian Housing and Urban Research Institute, 2023; [Developing the National Housing and Homelessness Plan – Issues Paper](#), Department of Social Services, 2023.

¹¹ [Ageing in a Housing Crisis: Older people’s housing insecurity & homelessness in Australia](#), Housing for the Aged Action Group. 2023.

¹² [Developing the National Housing and Homelessness Plan – Issues Paper](#), Department of Social Services, 2023.

¹³ [Homelessness and Homelessness Services](#), Australian Institute of Health and Welfare, 2023.

¹⁴ [Specialist Homelessness Services Annual Report 2021–22](#), Australian Institute of Health and Welfare, 2022.

¹⁵ [Gender Indicators](#), Australian Bureau of Statistics, 2023; [Stress and Trauma](#), Australian Institute of Health and Welfare, 2022; [The Health of Australia’s Females](#), Australian Institute of Health and Welfare, 2023.; [The Health of Australia’s Males](#), Australian Institute of Health and Welfare, 2023; [Glass Ceilings: Gendered Inequality in the Housing System – The Australian Housing Monitor, Report 2](#), Centre for Equitable Housing, Per Capita, 2023; [Evicted by Climate Change: Confronting the Gendered Impacts of Climate-Induced Displacement](#), CARE Australia, 2020; [Investing in Women’s Mental Health](#), Maria Duggan, 2016.

¹⁶ [Homelessness and Homelessness Services](#), Australian Institute of Health and Welfare, 2023.

- FDV is the leading cause of homelessness in Australia.¹⁷

42% of women accessing SHS cited FDV as their primary reason for doing so.¹⁸

Housing affordability, access to home ownership, social housing, and homelessness services; homelessness, and early prevention measures are therefore gendered issues. This means it is important that there are services and policies specialised and appropriate for women and the unique problems they experience.

Given the gendered inequalities in housing insecurity and homelessness there is therefore a need to take a gendered lens to policy. “No comprehensive approach to understanding gender and its role in housing currently exists in Australia or internationally,” though the Australian Housing and Urban Research Institute is currently developing a “framework for assessing the gendered nature of housing”.¹⁹ Any housing policies, especially those regarding renting, social and affordable housing, home ownership, and homelessness, will directly impact women. Taking a gendered lens to housing policy is therefore essential to address these gendered inequalities and ensure that future generations of women are not condemned to these inequalities.

RECOMMENDATIONS

Significant contributing factors for housing insecurity and homelessness among older women are lower incomes, poverty, and unaffordable housing. Arising from historic policy failure, addressing these issues for the 400,000 women aged 45 or older who are at risk of homelessness²⁰ will require governments to increase funding for homelessness services, early prevention, social/community/affordable housing, as well as ensuring funding is appropriately allocated and used.

To improve outcomes for future generations of retired women, there should be a focus on early intervention and address contributing factors to homelessness/housing insecurity, especially those primarily affecting women. There has been increasing international recognition of the importance of

¹⁷ [Glass Ceilings: Gendered Inequality in the Housing System – The Australian Housing Monitor, Report 2](#), Centre for Equitable Housing, Per Capita, 2023.

¹⁸ [Housing, Homelessness and Domestic and Family Violence](#), Australian Housing and Urban Research Institute, 2022.

¹⁹ [What are the Real Costs of Australia’s Housing Crisis for Women?](#), Australian Housing and Urban Research Institute, 2023; [Gendered Housing Opportunities, Pathways, Assistance, and Impacts](#), Australian Housing and Urban Research Institute, n.d.

²⁰ At risk: Understanding the population size and demographics of older women at risk of homelessness in Australia, D Faulkner and L Lester, 2020 <https://www.older tenants.org.au/content/risk-understanding-the-population-size-and-demographics-older-women-risk-homelessness>.



these universal prevention efforts.²¹ Importantly, over the long-term the housing crisis will only be addressed by improving housing supply.

The housing crisis has a particular impact on older women who, due to lower levels of financial security, are facing homelessness at greater rates.²² Women retire with 24% less super than their male counterparts,²³ due in part to factors such as their lower wages over the lifecycle, being more likely to undertake unpaid caring responsibilities, and being less likely to participate in full-time work.²⁴

The following recommendations capture priorities for both improving housing supply and increasing women's financial security in retirement.

1. Continue to work to address housing supply.

As with retirement policy settings, there are multiple reforms needed to improve housing security for women as they age. Importantly, state and federal governments must continue to focus on increasing housing supply, particularly housing that meets the needs of low-and-middle income earners.

An important element of this will be creating more opportunities for large investors like super funds to invest in residential housing. An innovative approach needs to be taken here, with support for different investment types, and for developing the build-to-rent and build-to-rent-to-own sector into an institutional asset class beyond the premium end of the market. In other jurisdictions like the US, build-to-rent assets make up a higher portion of institutional property portfolios²⁵. However, Australia's institutional build-to-rent sector is only just emerging, and there is a lack of institutional product. Supporting this will be an important component of delivering an overall increase to housing supply and providing more stable housing choices to Australian women.

2. Align the Low-Income Super Tax Offset (LISTO) with PAYG thresholds.

The Government should increase the amount of the LISTO and introduce a mechanism to ensure that the eligibility for the LISTO is permanently aligned with changes to tax brackets. The Low-Income Super Tax Offset (LISTO) is a government superannuation contribution of up to \$500 per year and is designed to ensure the tax rate on compulsory contributions is not higher than the amount of income tax paid

²¹ [Advancing a Five-Stage Typology of Homelessness Prevention](#), Suzanne Fitzpatrick, Peter Mackie, and Jenny Wood, 2021; [Evolving an evidence-Based Model for Homelessness Prevention](#), Abe Oudshoorn, Erin Dej, Colleen Parsons, and Stephen Gaetz, 2020.

²² [Older Women's Risk of Homelessness: Background Paper](#), Australian Human Rights Commission, 2019; [Poverty and Homelessness – The Reality For Too Many Older Women](#), StreetSmart, 2021.

²³ [ASFA Pre-Budget Submission for the 2022-23 Budget](#), The Association of Superannuation Funds of Australia, 2022.

²⁴ [Closing the Gender Superannuation Gap](#), Industry Super Australia, n.d.

²⁵ [Buildings: Increase Government Support for Build-to-Rent: Should We Expect Affordable Housing?, 2023](#)

by income earners²⁶— in other words, that low-income earners do not suffer a tax penalty for making super contributions. Data collated by Women in Super from thirteen member super funds showed that 63% of all LISTO recipients are women. LISTO eligibility remains aligned with the 19% tax bracket upper limit of \$37,000, although the limit has increased to \$45,000. The concessional contributions cap was raised as of 1 July 2021 as a result of indexation, in line with average weekly ordinary time earnings.²⁷ Incongruously, the LISTO was not adjusted as well. This means that the lowest paid, who are typically women, pay more tax on super than on their take home pay – a penalty which is not incurred by higher income earners, most of whom are men.

Aligning the LISTO with PAYG thresholds would benefit the 632,000 Australian women who are earning between \$37,000 and \$45,000²⁸.

A 30-year-old woman earning \$40,000 a year would be up to \$56,170 better off at retirement if the Government increased the maximum amount of the LISTO to \$640 and introduced an ongoing mechanism to align the LISTO with other changes in the tax system. This measure would then have a significant impact on a large number of Australian women, improving their retirement outcomes, helping to lift them out of poverty and accessing adequate housing.²⁹

2. Extend compulsory super to the Government's Parental Leave Pay scheme.

The Government should extend compulsory super to the Government's Parental Leave Pay scheme. It is unfair and discriminatory that one of the only forms of leave that does not attract super is accessed predominately by women, when other forms of paid leave such as sick leave, annual leave and long service leave attract super payments.³⁰ The Superannuation Guarantee should be paid on the Government's Parental Leave Pay scheme, so that all parents can continue to grow their superannuation while on parental leave. This payment will have the greatest impact for women, who make up 99.5% of recipients of the Government Parental Leave Pay.³¹ This will prevent some of the stagnation of growth of women's super-balances around child-rearing years and will decrease the super gap between women's and men's balances that widens significantly between ages of 38 and 47.³²

²⁶ [Low Income Super Tax Offset](#), Australian Taxation Office, 2023.

²⁷ [Concessional Contributions Cap](#), Australian Taxation Office, 2023.

²⁸ [Australian Taxation Office, Percentile distribution of taxable individuals, by taxable income and sex, 2018–19 income year.](#)

²⁹ [A Super Tax Adjustment is Needed to Stop Women Taking Further Hits to Their Retirement Savings](#), Industry Super Australia, 2020.

³⁰ [Super on Paid Parental Leave](#), HESTA, n.d.

³¹ [Australia May Have Just Taken a Backward Step on Paid Parental Leave](#), Owain Emslie, 2022.

³² [Closing the Gender Superannuation Gap](#), Industry Super Australia, n.d.



A mother of two will be \$14,000 better off at retirement if she receives super on the 18 weeks of Parental Leave Pay. On the median account balance of \$137,051, this is an additional 10%.

3. Explore and implement a Carers Credit framework in Australia’s retirement income system.

Unpaid caring is not economically valued, and women continue to bear the workload of unpaid care in Australia. On average, women spend 64% of their ‘working hours’ with no remuneration in comparison to 36% for men.³³ Women represent 70% of unpaid primary carers for children and almost 60% of unpaid carers for the elderly, people with a disability or those with a long-term health condition.³⁴ Centrelink does make a Carers Payment, but many carers are not currently entitled to it, despite needing financial support.³⁵ Unpaid caring roles should be valued in an appropriate way that recognises the economic contribution made by this work - caring credits can do this. This will close the super gap by increasing women’s balances and bringing them more in line with the necessary amount and help to provide for a fairer retirement system and will improve the retirement experience of women by recognising the incredibly important economic and social contribution they make through unpaid caring work.

Yours faithfully,

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³³ [Unpaid Care Work and the Labour Market](#), Workplace Gender Equality Agency: Insight Paper, 2016.
³⁴ [Disability, Ageing, and Carers, Australia: Summary of Findings, 2012](#), Australian Bureau of Statistics, 2016.
³⁵ [Carer Payment: Who Can Get It](#), Services Australia, 2023.