



Western Homelessness Network submission to the Productivity Commission Review of the National Housing and Homelessness Agreement

"Homelessness is something that nobody should experience and when it happens, it can be unexpected and there is not enough support for people in need. Housing is an entitlement, not a dream."

"It was the hardest time I have been through in my life and there should be more support and help for people that find themselves in this situation; it could happen to anyone."

"Build more houses and create new jobs so people are kept busy and engage in beneficial things for themselves and also the community."

"You need to give more help. I lost my job because of my health and now I am losing my home because I don't have enough money. Rent is too high and my Centrelink doesn't cover all my costs."

"How can I get a job if I cannot go to school and cannot have a safe home?"

"When you are homeless you never feel safe, who will hit you or where you are. When you have a government house, you feel safe even if you have no food."

**Prepared by the Western
Homelessness Network**

March 2022



Membership of the Western Homelessness Network:



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Introduction

This submission has been drafted by the Western Homelessness Network in response to the Productivity Commission Review of the National Housing and Homelessness Agreement (NHHA) Issues Paper. The Network has paid particular attention to the questions in the Issues Paper that are of particular significance to the Network.

The Western Homelessness Network is the Network of 24 Specialist Homelessness Services, managing 114 programs and 10 allied services, in Melbourne's west. These services meet every six weeks to improve responses to people experiencing homelessness in Melbourne's West through management of coordinated homelessness service system arrangements, consumer consultation, linkages with allied service sectors and shared professional development.

Melbourne's west, incorporating the Local Government Areas of Melbourne, Moonee Valley, Maribyrnong, Wyndham, Hobsons Bay, Brimbank and Melton, is an area crying out for a 'NHHA Plus'.

The Western Homelessness Network sees the NHHA as an important document, tying both State and Federal Governments to responsibility for provision of housing and for homelessness responses to people experiencing homelessness. But the NHHA does not go far enough in tying all levels of Government to responsibility for addressing the housing crisis in Australia that is causing hardship for such a significant proportion of Australians.

The impact of being without a stable home is devastating for the individuals and families who are experiencing it and is costly for the community.

A recent report by the BankWest Curtin Economics centre reveals that just under 3 million people in Australia (2,958,800) are assessed to live under a 'standard' poverty line of 50 per cent of median income in 2020. This represents nearly 11.8 per cent of the population and includes nearly 750,000 children¹. ACOSS and UNSW identify that one of the key determinants of poverty is housing cost and that home ownership levers are one of the key drivers of inequality in Australia².

This week Tone Wheeler articulately argued that "inequality is the greatest threat to our society, and nowhere is that inequality more evident than in housing. The rich get richer with ever more houses; the poor get rent stress or homelessness. And inequality will only grow with the rising incidence of housing crises resulting from natural disasters like fire and flood. "Housing is absolutely essential to human flourishing", wrote the American sociologist Matthew Desmond. "Without stable shelter, it all falls apart." "³

Yet in 2018, Australia ranked as the second wealthiest country in the world when household wealth is adjusted by person⁴ – we have sufficient resources to accommodate our population. Housing is an expensive commodity and successive state and federal governments have been reluctant to invest in housing, most likely because the benefits are not seen within a single election cycle.

The NHHA has the potential to provide the vehicle for garnering bi-lateral support and resourcing sufficient to end the housing crisis in Australia.

¹ Duncan A, 'Behind the Line: Poverty and disadvantage in Australia 2022', Bankwest Curtin Economics Centre Focus on the States Series, #9, March 2022, p. 21

² ACOSS and UNSW, Poverty in Australia 2020, Part 2: Who is affected? (ACOSS, Canberra, 2020)

³ Wheeler, T., 'We must separate the idea of house from home': the case for drastic action on shelter (The Guardian, Sunday 13th March 2022)

⁴ Visual Capitalist, Ranked: The Richest Countries in the World ([Ranked: The Richest Countries in the World](https://www.visualcapitalist.com/ranked-the-richest-countries-in-the-world/) ([visualcapitalist.com](https://www.visualcapitalist.com)) May 2019

Thank you

The Western Homelessness Network would like to thank the Productivity Commission for reviewing the NHHA and would particularly like to thank the Commission for the comprehensive Issues Paper underpinning the Review and for seeking participation in the review process.

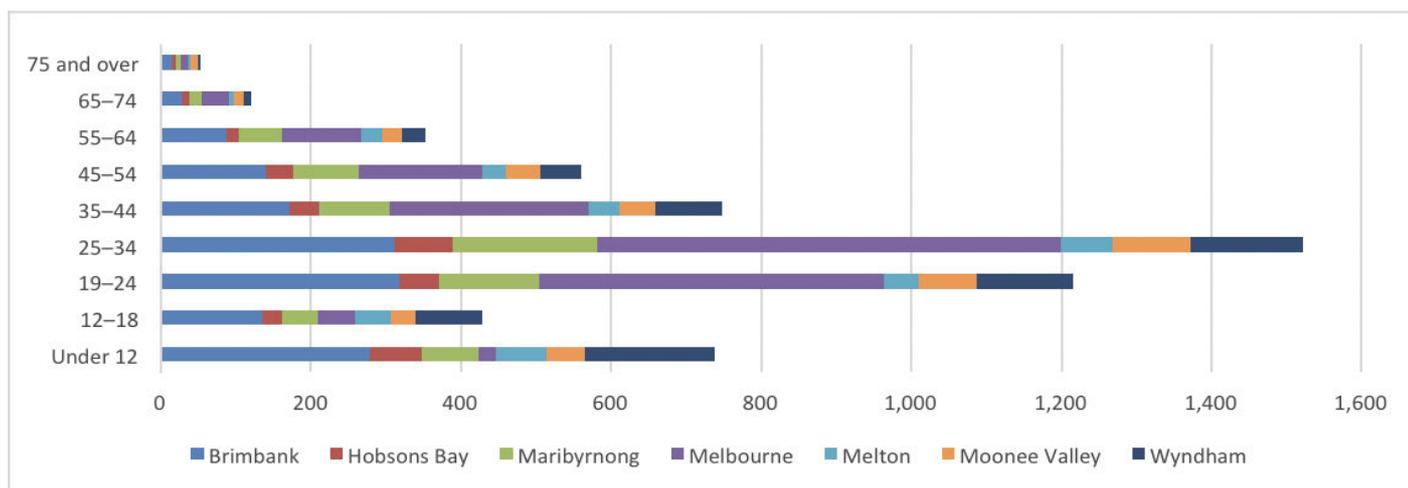
If you would like any more information, please contact:

Western Homelessness Networker

Context: Homelessness in Melbourne's west

The rate of people experiencing homelessness has been increasing in Victoria in recent years; this holds particularly true for Melbourne's West, recording a 40% increase in the number of people experiencing homelessness between Census 2011 and 2016. This is a significantly higher increase than the rest of the state, which saw a rise of 14 per cent⁵. In other words, 23 per cent of all the people experiencing homelessness in Victoria on Census night 2016, identified as being in Melbourne's west.

Figure 1: Number of people experiencing homelessness in Melbourne's west on Census night 2016, by age and Local Government Area.



Anecdotally, the numbers of people experiencing homelessness in the West has continued to rise since 2016, well beyond a level at which the 114 NHHA funded programs can respond. This would suggest that the reach of the NHHA is not far enough in "improving housing outcomes across the housing spectrum, including outcomes for Australians who are homeless or at risk of homelessness, and need to work together to achieve those outcomes"⁶.

The nature of homelessness in Melbourne's West has been changing significantly in recent years. The housing affordability issues that have affected the west have led to a surge in overcrowding⁷, with an increase of 80% between the 2011 and 2016 censuses⁸. The most visible face of homelessness, rough sleeping, increased by 120% in the same period⁹ and there was a 50% increase in people living temporarily with other households¹⁰.

⁵ Western Homelessness Network 2019, 'Ending Homelessness in the West' Western Homelessness Network, <http://www.nwhn.net.au/admin/file/content2/c7/Ending%20Homelessness%20in%20Melbourne's%20West%20Aug%202019_1571202882052.pdf>.

⁶ NHHA, p. 2

⁷ Defined by the ABS as dwellings that are four or more bedrooms short, allowing for gender and age.

⁸ WHN 2019a, 'Ending Homelessness in the West', p. 3.

⁹ Even taking into account the fact that the count of those sleeping rough in the West was a significant undercount, impacted by insufficient capacity to undertake the count.

¹⁰ WHN 2019a, 'Ending Homelessness in the West', p. 3.

Context: Housing in Melbourne’s West

This increase in the numbers of people experiencing homelessness in the West is a direct result of the housing crisis – both in terms of supply and affordability. The West has historically been one of the most affordable areas of Melbourne. This is no longer the case. Private rental vacancy rates are low in Melbourne (2.1%¹¹) and rents are high and have now returned to pre COVID levels, following a slight decrease during 2020 and 2021. In March 2021 there were no private rental properties available in the West that were affordable for someone on Newstart or Youth Allowance¹².

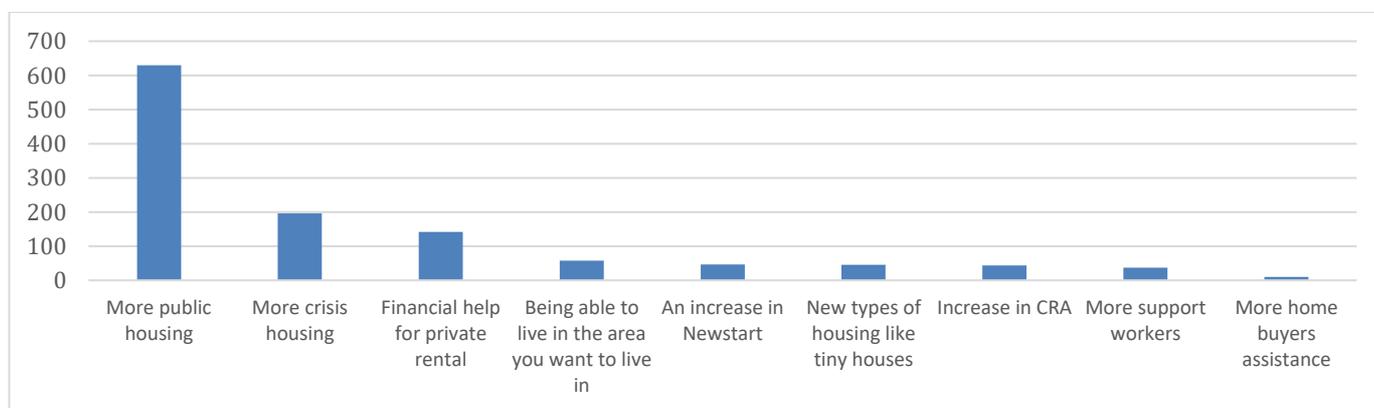
A key determinant in the increasing rate of homelessness in Victoria is the severe undersupply of social and affordable housing. **There are 14,358 social housing properties in Melbourne’s west however, given that movement into public housing is minimal, there are 9,708 on the waiting list for access to those properties in Melbourne’s west.**¹³ This represents nearly one fifth¹⁴ of those waiting for public housing in the State.

An absence of safe, affordable housing is driving these marked increases in the numbers of households experiencing homelessness and the high numbers of people approved for priority access to social housing. Our supply of housing is insufficient to house our population. Plan Melbourne estimates that Melbourne will need an additional 1.6 million new homes by 2051 in order to meet this current and growing need¹⁵. Melton and Wyndham, in Melbourne’s west, are growing faster than any other area of Melbourne¹⁶.

Lack of supply has resulted in an all-time low in private rental affordability. Whilst Melton and Brimbank still rate in the top 10 most affordable local government areas (LGAs) for people earning a minimum wage, none of the LGAs in the West are represented in the top 10 most affordable Victorian LGAs for people who are receiving Centrelink payments. This reflects a significant change for the West, which was one of the last bastions of affordability¹⁷ in Melbourne.

Each year, the Northern and Western Homelessness Networks survey consumers about their experience of homelessness and the homelessness service system. In 2019 the Networks asked consumers to rank strategies that could address homelessness in Melbourne. This is their response:

Figure 2: Rank of top three priorities for things that would help end homelessness: identified by SHS consumers 2019



¹¹ Rental report, December quarter 2018, Department of Health and Human Services (2018)

¹² Anglicare Australia, Rental Affordability Snapshot/National Report/April 2021 (Anglicare, 2021)

¹³ Homelessness Australia advises in the Everybody’s Home campaign, that Australia will need 500,00 new social and affordable homes by 2026.

¹⁴ Homes Victoria, Total number of social housing applicants on the Victorian Housing Register - December 2021 (Homes Victoria, Melbourne, 2022)

¹⁵ *Victoria in Future 2016* and Department of Environment, Land, Water and Planning, internal analysis, estimated employed persons derived from Victoria in Future 2016, quoted in Victorian State Government, *Plan Melbourne 2017 – 2050*, (Victorian Government, Melbourne, 2017).

¹⁶ NorthWest Primary Health Network, *North West Population Growth*, (NWPHN, 2019)

¹⁷ The National Minimum Wage as set by the Fair Work Commission, *Annual Wage Review 2017-2018*, (Fair Work Commission 2018)

Western Homelessness Network Response to NHHA Review Issues Paper

1) Assessing the performance and suitability of the Agreement

1.1 What is the purpose of the NHHA? Is its purpose clear and appropriate?

The overarching purpose of the National Housing and Homelessness Agreement (NHHA) is to identify that both State and Federal Governments have a role in ‘improving outcomes across the housing spectrum, including outcomes for those Australians who are homeless or at risk of homelessness¹⁸’ and to tie State and Federal Government to shared funding and coordinated responsibility for this.

Broadly, this high level purpose is clear, in that it does tie State/Territory and Federal Governments to a coordinated interest in housing provision. The Western Homelessness Network argues that the stated purpose, however, is not sufficient, in that it lacks an analysis of the current housing crisis in Australia and does not include adequate rationale, evidence base and clear targets consistent with this.

The requirements that follow the overarching purpose in the Agreement, places responsibility on the Federal Government for provision of funding only and does not tie either level of Government to ending the housing crisis in Australia. A clear rationale as the basis for a national agreement, such as that identified in the Productivity Commission Review Issues Paper, by the Commonwealth Housing Commission (CHC), would lead to an Agreement based on a National Housing Strategy, designed to end Australia’s housing crisis.

The Issues Paper identified that:

“the CHC articulated a bold vision: ‘We consider that a dwelling of good standard and equipment is not only the need but the right of every citizen’ (CHC 1944, cited in Troy 2012). It advised the Australian Government to take an active role providing housing to overcome the housing shortage (estimated at the time to be about 300 000 dwellings). The housing shortage was considered national in scope and beyond the resources of the States to address.”¹⁹

The housing crisis has worsened since this time, largely because Governments no longer identify provision of affordable housing as a right of every citizen.

The current NHHA identifies that access to a stable and safe home underpins ‘social and economic participation’²⁰ but the requirements that follow do not ensure access to a stable and safe home for all Australians. The NHHA must be strengthened to re-state access to a stable and safe home as a human right.

The Review Issues Paper has identified that ‘between 1945 and 1965, around one in six houses were said to be built by state housing authorities’²¹. If funds could be found to construct social housing in the 1960s, why not now? Why has the imperative to appropriately housing Australians changed? If there is one thing that the COVID pandemic has shown us, it is the funds can be found if needed and that a stable home is central to citizen’s safety and wellbeing.

1.2 Is the purpose of the NHHA suitable for the next agreement? If not, what should be the purpose of the next agreement? For example, should the next agreement be primarily a funding agreement focused on homelessness services and social housing or should it be a national housing policy agreement (or both)?

The WHN believes that the NHHA is not adequate in its current form, for the next Agreement. The housing crisis in Australia now affects large portions of the population and is only set to worsen, if proactive steps are not taken, through a multi-policy approach, to address the issue.

As stated, the broad purpose of the current Agreement is vague and requires only an unspecified ‘improvement’ to the housing outcomes for Australians:

¹⁸ National Housing and Homelessness Agreement (NHHA), Commonwealth of Australia, Canberra, 2018, p.2

¹⁹ Productivity Commission, Review of the NHHA Issue Paper, (Productivity Commission, Canberra, 2021) p. 3

²⁰ NHHA, ob. cit., p. 1

²¹ Productivity Commission Review of the NHHA Issue Paper, ob cit. p. 3

“This Agreement will contribute to improving access to affordable, safe and sustainable housing across the housing spectrum, including to prevent and address homelessness, and to support social and economic participation²².”

The introduction to the Agreement identifies the very real and significant link between stable housing and social and economic participation but does not require signatories to ensure access to affordable, safe and sustainable housing. If it is established that ‘affordable, safe and sustainable’ housing is a positive thing and that it enables social and economic participation, why would the agreement not require its provision?

Julie Wilson and colleagues identify: “Safe, adequate, affordable and appropriate housing is critical to health, wellbeing and social and economic security, but many Australians cannot find housing in the private market, and the social housing system, incorporating public and community housing, is under-resourced and manifestly unable to meet demand”²³.

The Australian Housing and Urban Research Institute, in its Inquiry into increasing affordable housing supply in Australia, concludes that “with existing levels of social housing insufficient to meet current and projected needs, an estimated deficit of over 200,000 affordable dwellings, and mounting barriers to first home ownership, the need for significant reform and innovation across the governance, policy and financial parameters framing affordable housing supply is widely recognised (Yates 2016, Ong, Dalton et al. 2017, Rowley, Leishman et al. 2017).”²⁴

The Western Homelessness Network therefore strongly supports those who recommend that the NHHA should be reframed to enact a national housing policy, drawing on evidence to identify levers and targets to address the housing shortage in Australia and to ensure that adequate levels of affordable housing are available for all those who need it.

The Agreement must establish a strategy to end the housing crisis and incorporate targets and timeframe for achievement of those targets.

An updated NHHA must intersect better with other drivers of homelessness and housing stress in order to both prevent homelessness and respond to the growing housing crisis. For instance, provision of adequate income security, responses to people experiencing mental health issues, prevention of family violence, planning functions.

1.3 What are the main reasons for, and the benefits and costs of, a national housing strategy? How would a national housing strategy intersect with the next agreement?

The Western Homelessness Network strongly supports those commentators who have suggested that Australia needs a more systematic approach to housing policy and are calling for a national housing strategy. AHURI has identified that:

“Australia’s housing system is failing to deliver a sufficient supply of affordable homes and wider affordability pressures are affecting household wellbeing. A national strategic framework is needed to address these failures. By integrating and enhancing the public subsidies, financial settings, policy levers and programs that exist across the three levels of government, a national framework for housing will drive outcomes across the continuum of housing needs and help deliver long-term growth of affordable housing supply.

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²² NHHA, ob. Cit., p.1

²³ Julie Wilson et al, Social housing as infrastructure: rationale, prioritisation and investment pathway (Australian Housing and Urban Research Institute Limited Melbourne, Australia, July 2019)

²⁴ Gurrán, N., Rowley, S., Milligan, V., Randolph, B., Phibbs, P., Gilbert, C., James, A., Troy, L. and van den Nouwelant, R. (2018) Inquiry into increasing affordable housing supply: Evidence-based principles and strategies for Australian policy and practice, AHURI Final Report 300, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/final-reports/300>, doi: 10.18408/ahuri-7313001.

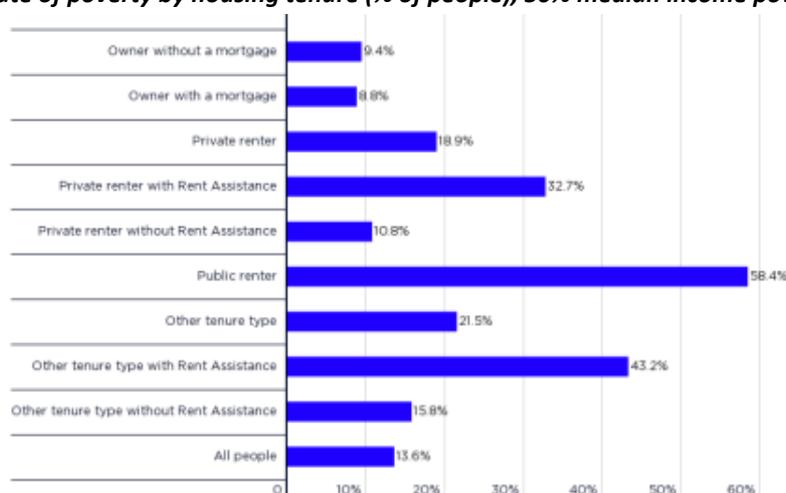
exist across the three levels of government, a national framework for housing will drive outcomes across the continuum of housing needs and help deliver long-term growth of affordable housing supply.”²⁵

The lack of housing, and particularly of affordable housing in Australia, has reached a crisis point and is affecting the majority of Australian citizens:

- In 2017–18, 47.8% of low-income households in greater capital city areas and 35.6% of low-income households in the rest of the states and territories were considered to be in rental stress ²⁶.
- 1.5 million households with a mortgage are currently in financial stress, which he defines as spending more than they earn. That's 42 per cent of mortgagors²⁷.
- Over 100,000 Australians are experiencing homelessness²⁸.

In addition, we know that young people are struggling to enter the housing market, increasing numbers of older people are moving into retirement with a mortgage and that older women are the fastest growing group of people experiencing homelessness.

Figure 3: Rate of poverty by housing tenure (% of people), 50% median income poverty line²⁹



Note: 'other tenure' includes community housing

The housing crisis is set to worsen. The National Housing Finance and National Housing Finance and Investment Corporation 2022, State of the Nation’s Housing 2021-22³⁰ identifies that 1.7M new households will be established in Australia between 2022 and 2032. Plan Melbourne has identified that 1.6M more properties must be constructed in

²⁵ AHURI, Inquiry into increasing affordable housing supply: Evidence-based principles and strategies for Australian policy and practice (AHURI, 2018)

²⁶ AIHW, Housing Affordability (AIHW, Canberra, 2021)

²⁷ ABC News, Mortgage stress set to rise with interest rates and recent home buyers will be hit hardest (ABC, 17 March 2022) [Mortgage stress set to rise with interest rates and recent home buyers will be hit hardest - ABC News](#)

²⁸ ABS, Census of Population and Housing: Estimating Homelessness (ABS, Canberra, 2018)

²⁹ ACOSS and UNSW, Poverty In Australia 2020, Part 2: Who is affected? (ACOSS, Canberra, 2020)

³⁰ National Housing Finance and National Housing Finance and Investment Corporation, State of the Nation’s Housing 2021-22 (National Housing Finance and National Housing Finance and Investment Corporation, Sydney, 2022)

Melbourne alone by 2050, in order to address growing housing need³¹. Interest rates are set to rise, pushing increasing numbers of Australians into mortgage stress.

The Agreement acknowledges that “there is a range of factors outside of the scope of this Agreement that impact the housing market, including Commonwealth and State tax settings, financial sector regulation, immigration, income support and rental subsidies.”³² The next necessary step is to integrate policy in all these areas to successfully end the housing crisis.

Ending this crisis can only be addressed by an overarching strategy that identifies the many levers, at all levels of government, that have created this crisis and which provides a comprehensive, evidenced based strategy to end the crisis.

Ending Australia’s housing crisis will be a costly exercise initially. The social and economic benefits will pay out in time, but well outside an electoral cycle timeframe. Governments are loath to implement policy that does not ‘pay out’ within the election cycle. Some of the necessary strategies will not be popular with powerful voters. The strategy, therefore, needs to be taken out of the realm of elections and party politics, to sit as an agreement between all levels of Government.

The key benefit of a National Housing Strategy will be a population that is housed. As stated in the audit of the Commonwealth State Housing Agreement: “Shelter is an essential of life, and the quality of housing has a major bearing on the quality of life of its residents. Housing is seen as having an important relationship to health, poverty and general living standards.”³³

And, as Peter Mares says:

“There is a profound physical, cultural, social and psychological connection between the safe interior of a home and the uncertain exterior of the world beyond. If we lack the former, then it is much harder to successfully navigate the latter... The crude physical necessity of shelter from the storm is just one essential component in the larger picture of our emotional and psychic need for a place where we can be at home. The widespread recognition of this is implicit in everyday language; we do not refer to people who have nowhere to live as ‘houseless’, but as ‘homeless.’”³⁴

Intervening is cheaper than not intervening

Research into responses to people sleeping rough has found that provision of support and accommodation for people who is sleeping rough not only provides those individuals assisted with a greater chance of health, wellbeing and economic participation, but is cheaper than not intervening:

“Analysis shows that the government providing one last resort bed will generate a net benefit of \$216,000 over 20 years. That averages to a net benefit of \$10,800 per year. The majority of those benefits (75%) flow to society and the remainder to the individual. For every \$1 invested in last resort beds to address the homelessness crisis, \$2.70 worth of benefits are generated for the community (over 20 years). In other words, the benefits of providing last resort housing outweigh the costs.

There is much to gain in economic and social terms, both for government and society, by assisting the homeless. This is because if homeless individuals find stable accommodation they require less healthcare and fewer emergency admissions, and they are less likely to be involved in crime (both as victims and perpetrators). They are more likely to reconnect with employment and education. Homelessness also incurs property blighting and

³¹ Metropolitan Planning Strategy, Plan Melbourne, 2017-2050
(Victorian Government, Melbourne)

³² NHHA, ob. cit., p. 2

³³ Australian National Audit Office, The Commonwealth–State Housing Agreement Department of Family and Community Services (Commonwealth of Australia, Canberra, 1999)

³⁴ Mares, P., No Place Like Home: Repairing Australia’s Housing Crisis
(The Text Publishing Company, Melbourne, 2018)

nuisance costs. Importantly, last resort housing can greatly improve the quality of life of individuals. Our analysis shows that the form of last resort housing which makes the most sense economically is the construction of new, permanent stock – especially medium to large-sized facilities. Converting existing buildings, and subsidising private rentals, are both worth considering as well especially in the short term.”³⁵

Research by Cameron Parsell, Maree Petersen and Dennis Culhane shows that not intervening in housing crisis can be more costly to both the individuals and the community, than not intervening. They have worked to build a body of evidence for this in Australia, to reinforce findings in the USA and UK. Their study of provision of housing and support for people who had been sleeping rough shows:

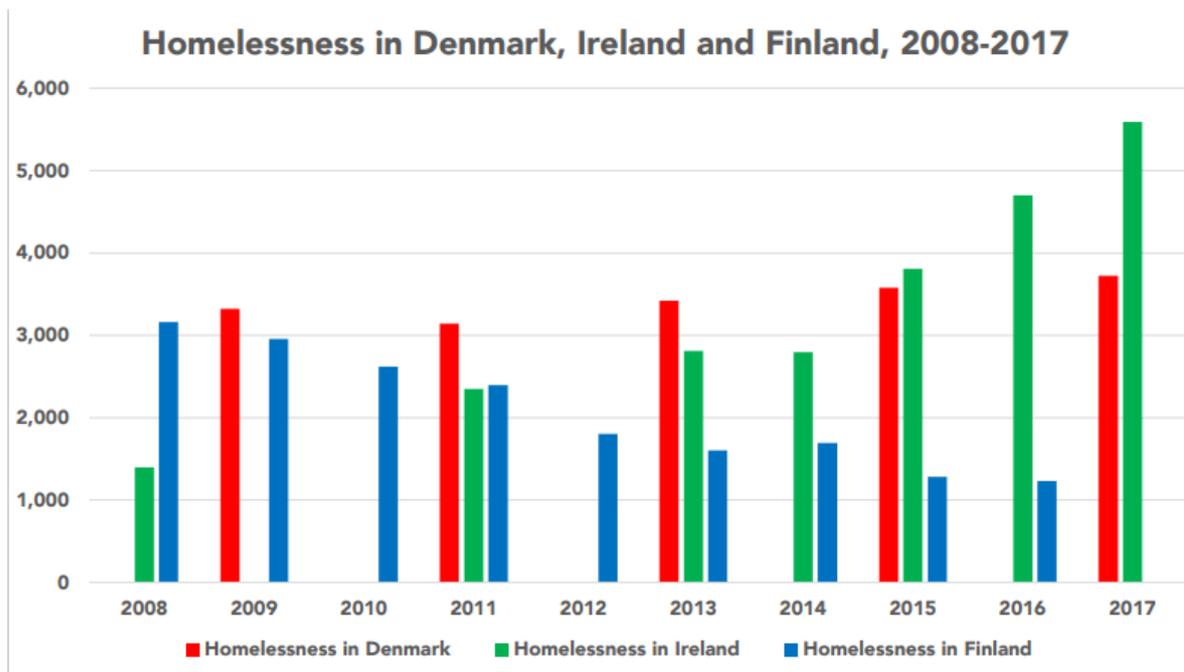
“If we divide the total costs of services used by the forty-one tenants (\$1,976,916; £1,056,757) pre tenancy commencement, we see that each tenant used on average \$48,217 (£25,776) in health, criminal justice and homelessness services in a year as homeless, and the same tenants used on average \$20,788 (£11,112) in health, criminal justice and homelessness services in a year as a supportive housing tenant.”³⁶

A national strategy can end homelessness

Finland is often quoted as the country that has ended street homelessness. The following table shows a comparison of the number of people experiencing homelessness between Denmark, Ireland and Finland, 2008-2017³⁷.

As the figure below shows, homelessness was eradicated in Finland by 2017. This was a direct result of a comprehensive national housing strategy with a policy focus on ‘housing first’: provision of housing, with linked support, at the earliest point in a individual/household’s experience of homelessness.

Figure 4: Homelessness in Denmark, Ireland and Finland, 2008-2017



³⁵ Melbourne Sustainable Society Institute, Issues Paper Series: The Case for Investing in Last Resort Housing (University of Melbourne, Melbourne, 2017)

³⁶ Parsell, C., Petersen, M., Culhane, D., Cost Offsets of Supportive Housing: Evidence for Social Work (Oxford University Press for the British Journal of Social Work, 2016)

³⁷ Prof Eoin O’Sullivan, Ending Homelessness in Ireland, Denmark and Finland? (Trinity College Dublin, Presentation to National Homelessness Conference, Melbourne, 2017)

2) Is the objective appropriate and has it been achieved?

2.1 Is the objective of the NHHA appropriate? Is there agreement on the meaning of the objective's key terms (including 'affordable, safe and sustainable housing')? Is the scope of the NHHA —'across the housing spectrum' — appropriate?

The objective of the NHHA is broadly appropriate but it lacks detail in the definition of 'affordable, safe and sustainable' housing and it lacks measures, based on research, identifying the most effective measures of housing creation.

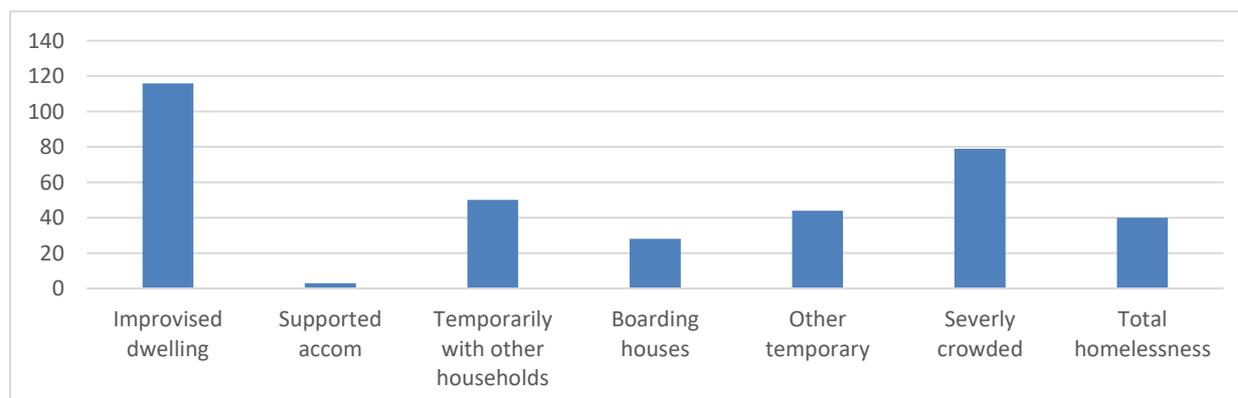
This has led to an over reliance on Commonwealth Rent Assistance (CRA) as a tool to 'improve housing outcomes' and therefore on the private rental market to respond to the needs of vulnerable Australians. The availability of CRA has not ensured availability of affordable housing. Anglicare's rental report (2021) found that, in March 2021, there was not a single property for rent in Australia that was affordable for someone on Newstart or Youth Allowance³⁸. This indicates either a failure in income security or housing provision or both.

2.2 To what extent has the NHHA met its objective? What evidence is there that the objective has (or has not) been achieved?

The objectives of the NHHA have not been met.

The evidence for this is in the ever increasing number of people who are becoming homeless, the growing numbers of households on social housing waiting lists and the increasing numbers of Australia's experiencing mortgage and rental stress. The figure below shows the growth in homelessness in Melbourne's west between 2011 and 2016. Anecdotal evidence suggests that this trend, in increasing numbers of people who are experiencing or at risk of homelessness, has continued since 2016.

Figure 5: Percentage change in homelessness in Melbourne's west from 2011 to 2016



³⁸ Anglicare Australia, Rental Affordability Snapshot/National Report/April 2021 (Anglicare, 2021)

Snapshot: Accessing the homelessness service system in Melbourne's west

The service system coordinated by the Western Homelessness Network provides an example of the failure of the NHHAA.

There are 90 homelessness and family violence programs operating in Melbourne's west.

In a year the two 'front end/access point' services in the West respond to approximately 13,500 households who experiencing or are at risk of homelessness. (NB: This data does not include the 34,000 referrals made to GenWest, the family violence entry point for the West.)

Approximately 4,000 of those households presenting to the two access point services will not be able to access an initial appointment because more people present for assistance than there are available appointments. The Access Point services will try to find crisis accommodation for those households presenting, who have nowhere to stay. There are 423 government funded crisis beds across Victoria¹. In 2018/19 the two access point services had to fund 3,774 crisis beds at a cost of \$1,050,000. Most of this purchased accommodation was in low end hotels and rooming houses, providing accommodation that is often unsafe and inadequate.

Those households requiring further support (to find housing or to address anything affecting their ability to maintain housing) or access to housing, are placed on a 'prioritisation list', awaiting referral to available resources. There are generally over 1,000 households on the prioritisation lists in the West at any one time. Only 11% of those presenting to the two access point services for assistance will be able to access homelessness case management support and only 2% will access one of the 500 transitional housing properties in the West.

Those households who do access support to find long term housing will then face either a 1-10 year wait for social housing or will spend months competing for access to private rental in a tight and expensive private rental market.



Households waiting at a Western Homelessness Access Point before the doors open in the morning.

More households are waiting than there are available appointments.

2.3 What should be the objective of the next intergovernmental agreement, taking into account the lessons learnt from the NHHA and earlier agreements?

The objective of the NHHA should be to end the housing crisis and to ensure that all Australians have a safe, affordable, appropriate and stable place to live.

The 'looseness' of the requirements on the parties to the NHHA, compared with earlier agreements, has enabled a dwindling of resources to address the housing crisis and a focus on strategies that rely on the private market, rather than on government provision of housing services:

“Over the eight year life of the 2009 National Affordable Housing Agreement, federal payments to the states and territories fell by more than 30% in real terms, from \$2.5 billion to \$1.7 billion. By contrast, federal government outlays on Commonwealth Rent Assistance grew 42% (from \$3.1 billion to \$4.4 billion... Yet the fact that the federal government is spending ever more on people with accommodation costs has not prevented a simultaneous sharp rise in the proportion of low-income housings that live in rental stress. ”³⁹
By 2016/17 53% of all private rental tenants were living in rental stress (up fro 35% in 2007/08.)⁴⁰

Over the same period, Governments have created tax incentives for investment in housing through capital gains tax discounts and negative gearing. **These concessions have cost Government more money that is directed to funding housing and homelessness services. In other words, Governments have directed one-third more funding to enable wealthy Australians to purchase additional housing, as they have to provide housing for those with nowhere safe to live:**

“Negative gearing and capital gains tax discounts are conservatively estimated to cost the federal government \$8 billion a year (Select Committee on Housing Affordability in Australia 2008, p. 61). This is more than the federal government spends annually on other housing assistance combined, including \$2 billion for social housing and homelessness assistance (Australian Treasury 2013) and \$4 billion for Commonwealth Rent Assistance (FaHCSIA 2013, p. 61)”⁴¹

³⁹ Mares, Peter, ob.cit., p. 219

⁴⁰ Mares, Peter, ob. Cit., p. 220

⁴¹ Toohey, S., The Failure of the Housing System, p. 259, in:
Chamberlain, C., Johnson, G., and Robinson, C., Homelessness in Australia: An Introduction
(Newsouth publishing, Sydney, 2014)

3) Outcomes of the Agreement

3.1. Is it possible to distinguish the contribution of the NHHA to the national outcomes from other policy and non-policy influences? If so, to what extent has the NHHA contributed to the agreed list of aspirational, overarching national outcomes? For example, has the NHHA contributed to a better functioning housing market?

The key outcome of the NHHA has been to tie both federal and state/territory governments to participation in the provision of housing and homelessness services and, in this, it has succeeded. This has enabled an ongoing homelessness and family violence system with capacity to respond to portion of those individuals and households who are experiencing homelessness and/or family violence and has ensured that a level [albeit completely inadequate to need] of social housing exists to accommodate those in greatest need.

The outcomes of the NHHA are well phrased but, in the absence of targets to achieve these outcomes, they remain empty aspirations. The Agreement must be built on an evidenced based approach to achievement of these outcomes – with appropriate funding allocation and linked targets to ensure achievement of measurable outcomes.

3.2 What has affected the achievement of the outcomes, and how?

Achievement of the outcomes identified in the NHHA are impacted by a multitude of factors, but the key impacts are caused by a housing shortage and a housing market that continues to grow in cost – both in terms of purchase and rental.

Insufficient funding allocated through the NHHA has led to a social housing stock that has dwindled in numbers and in quality over the years.

Unemployment, unchecked levels of family violence, increasing casualization and underemployment and inadequate income security have all contributed to creating an ever-growing cohort of Australian households who can no longer afford ever increasing rent and mortgage costs.

3.3 What strategies, levers and programs have governments used to contribute to these national outcomes? Have they been effective ways to achieve the Agreement's outcomes?

At its most base level, the NHHA ties both State/Territory and Federal Governments to provision of an established level of funding for housing and homelessness services. This tying of funds is key as it positions funding for housing and homelessness services outside election vagaries.

3.4 To what extent has the NHHA improved transparency and accountability about housing and homelessness outcomes? Is there scope for further improvements?

The NHHA requires each State/Territory to make publicly available a housing and homelessness strategy but does not require the Federal Government to develop a housing and homelessness strategy. The need to draft this strategy does require State and Territory governments to have a strategy, which is positive.

For instance, the 2018 Victorian Homelessness and Rough Sleeping Action Plan⁴² prompted encouraging service reforms in the provision of services to people who are sleeping rough in Victoria. The Plan offers a clear framework for the provision of services, which should form the basis of all responses to people experiencing homelessness: intervening early to prevent homelessness, providing stable accommodation as quickly as possible and supporting people to maintain stable accommodation

However, in the absence of defined targets, the existence of a housing and homelessness strategy has limited benefit in increasing transparency and accountability. If appropriate interventions were defined prior to signing of the next

⁴² Department of Health and Human Services, *Victoria's Homelessness and Rough Sleeping Action Plan*, (Victorian Government, January 2018), p. 11.

Agreement, and the funding necessary to achieve those outcomes allocated, then Federal, State and Territory governments could report transparently about progress in meeting those targets.

3.5 Are the priority homelessness cohorts and homelessness priority policy areas in the NHHA the right priorities? If not, what should the priority homelessness cohorts and homelessness priority policy areas be?

The priority homelessness cohorts but adequate but, in a functioning service system, identification of priority cohorts should not be necessary. The focus must shift to implementation of interventions with evidence based success in maintaining housing stability and ending homelessness such as: prevention and early intervention responses, family violence intervention and housing creation programs to avoid people becoming homeless and Housing First models for those who do become homeless.

4) Outputs of the Agreement

4.1 Are the outputs of the NHHA still relevant? Are different outputs needed? Should outputs be more prescriptive? Are the national housing priority policy areas the right priorities? If not, what should they be?

The outputs articulated in the Agreement are not sufficient. The requirement to hold a housing and homelessness strategy is toothless in the absence of measure targets. Targets, strategies and approaches, based on resolving the housing crisis, rather than on 'improvements' need to be agreed prior to signing an Agreement.

The Victorian Government has produced a sound Housing and Homelessness Strategy, but achievement of its aims are as vague as those outlined in the NHHA. Achievement of these outcomes can only be achieved when utilising all the levers available to all levels of government. How can the State and Territory jurisdictions achieve the outcomes of the NHHA when many of the levers of influence, sit with the Federal Government's purview?

To date there do not appear to have been consequences resulting from the development of vague housing and homelessness strategies. Will the Federal Government retract funding on the basis of insufficient outcomes arising from State/Territory housing and homelessness strategies? If they do, it is consumers supported by the housing and homelessness services who will suffer.

The current Agreement put responsibility solely on the States/Territories for finding ways to use finite resources to achieve the aspirational aims outlined in the NHHA. The strategies necessary to end the housing crisis should be agreed by **all levels of government** prior to signing an Agreement, with sufficient funding allocated at the outset of the Agreement, to achieve these targets. The onus will then be on the Commonwealth, States and Territories to report on achievement of these targets.

4.2 Has the requirement for States and Territories to have housing and homelessness strategies and statements of assurance improved outcomes? Do the programs and policies set out under the State and Territory Government housing and homelessness strategies contribute to the objectives and outcomes of the NHHA? If not, what improvements could be made?

As stated, the Victorian State Government has produced a positive housing and homelessness strategy and has allocated funding to construction of social housing. It is not clear whether the Victorian Government would have undertaken this work in the absence of the NHHA.

Certainly, the requirement to develop such a strategy does require that State and Territory governments give consideration to the issues addressed by a housing and homelessness strategy.

In past agreements the Commonwealth had a greater role in developing homelessness programs and quality assurance mechanisms. For instance, the Federal Government previously oversaw the Supported Accommodation Assistance Program, through the Commonwealth State Housing Agreement. In this role the Commonwealth developed guiding principles and tools for good practice, which the State/Territories then implemented. There were efficiencies and equities established by this role. One such tool, developed by the Commonwealth, was the SAAP Case Management Framework⁴³ and the accompanying Case Management Resource Kit for SAAP Services⁴⁴, which still stand up today as a good practice frameworks in homelessness service provision.

⁴³ National Case Management Working Group, National practice principles in SAAP case management (Commonwealth of Australia, Canberra, 1997)

⁴⁴ Leslie Gevers Community Management Services, Case Management Resource Kit for SAAP workers (Commonwealth of Australia, Canberra, 1997)

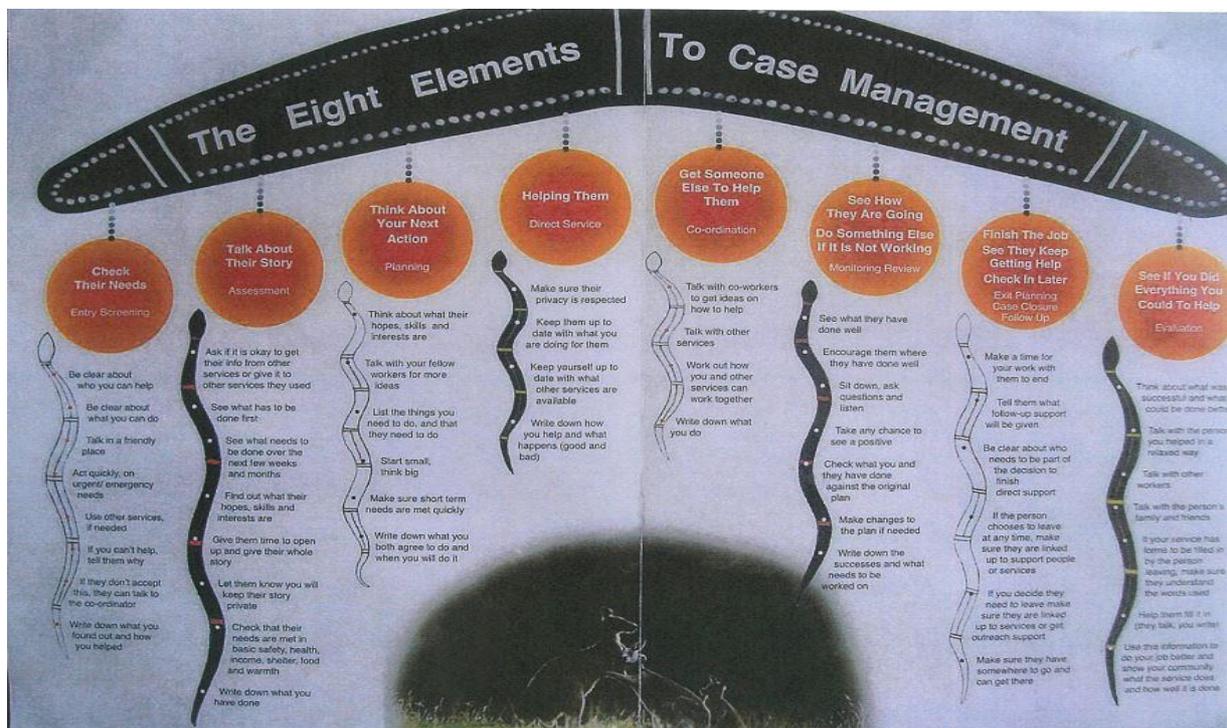


Illustration: The eight elements of SAAP case management

4.3 What progress has been made on improving data, including on the nationally consistent housing and homelessness data set?

The existence of a nationally consistent housing and homelessness data set is important in that it creates a national benchmark through which need can be determined and local performance can be measured.

The key challenge created by the National data set is in timely provision of data for State/Territory Governments and at the local level. The cost of purchasing tailored data is beyond the capacity of most homelessness networks. The Western Homelessness Network, for instance, lost access to regional data with the move from the Supported Accommodation Assistance Program National Homelessness Data to the Specialist Homelessness Services Collection. It is our understanding that, at the same time, the State/Territory Governments lost access to the confidentialised unit record files at this point, which had enabled State/Territory interrogation of the available data.

The current data system allows for states and territories to purchase additional data fields, as they require, to accommodate regional differences and priorities, but the timeliness of data reporting remains a challenge for states and territories. So much so that the Victorian Government has had to reproduce the data set, in order to conduct timely analysis, leading to double handling by over stretched homelessness services.

Adequacy of unmet need data remains an issue. The current Specialist Homelessness Services data collection is designed for homelessness case management service. Front end homelessness 'access point' services in Melbourne, which are high volume services that provide initial intake and triage for the homelessness system, report that they are so overwhelmed, that they do not have capacity to adequately report on client support periods or to complete turnaway data. This leads to a significant under reporting in unmet need.

Similarly, services report that they frequently identify provision of short term housing as a need that is met, rather than identifying that the need is for long term housing and that this need is unmet.

Another challenge of the current data system is that it is a client data set with data appropriately collected as identified by the client. For instance, the client identifies 'main reasons for presenting for assistance'. There is no scope for workers to contribute to the data, drawing on practice wisdom. Some services have also reported concern that the data set does not incorporate any measures of effort – so that it is not possible to determine level of need between one client and another. It is therefore difficult to draw on the current data set to evaluate the effectiveness of homelessness interventions.

5) The roles and responsibilities of governments under the Agreement

5.1 Are the roles and responsibilities of the Australian Government and the State and Territory Governments, as set out in the NHHA, clear and appropriate? How well are governments adhering to their roles and responsibilities, including their shared roles and responsibilities?

The Western Homelessness Network is of the view that government roles and responsibilities, as set out in the NHHA, are not clear and appropriate because the NHHA does not incorporate a coordinated strategy, incorporating requirements on all levels of government to enact all policy levers available to them to end the housing crisis and to respond appropriately to homelessness.

The Agreement acknowledges that “there is a range of factors outside of the scope of this Agreement that impact the housing market, including Commonwealth and State tax settings, financial sector regulation, immigration, income support and rental subsidies.”⁴⁵ The next necessary step is to integrate policy in all these areas in order to successfully end the housing crisis.

Ending this crisis can only be addressed by an overarching strategy that identifies the many levers, at all levels of government, that have created this crisis and which provides a comprehensive, evidenced based strategy to end the crisis.

5.2 What are the implications of the shared roles and responsibilities of governments? Are there ways that governments could more effectively work together to achieve better housing outcomes and improve transparency and accountability?

Governments could work more effectively together to achieve better housing outcomes if all levels of government shared a common understanding of a housing crisis and a belief that it is the role of Government to address this crisis for the benefit of Australians and Australia. If all levels of government shared this belief, they could enact a National Housing Strategy, which identifies levers available to each level of government, to address the housing crisis.

A National Housing Strategy would outline an evidence based approach to ending the housing crisis. Transparency would be increased if the strategy spelt out changes needed at the various levels of government and across all relevant policy areas, to end the crisis.

5.3 Are the roles and responsibilities of the different levels of government appropriate for the next agreement or should they be changed? For example, should local governments (who are not parties to the NHHA) be parties to the next agreement?

The current Agreement acknowledges that Local Government is responsible for:

- ‘(a) building approval processes;
- (b) local urban planning and development approval processes; and
- (c) rates and charges that influence housing affordability.’⁴⁶

Yet the current Agreement places no impost on Local Government to enact any particular approaches in response to those levers. A policy requirement and linked targets against those levers available to local governments will contribute to overall achievement of a National Housing Strategy focussed on housing creation and affordability.

Local Government has a key role in managing planning and land use mechanisms. Local Government, like State and Federal Governments, has access to land that could be utilised for affordable housing.

⁴⁵ NHHA, p.2

⁴⁶ NHHA, p. 5

5.4 All jurisdictions have policies which affect the housing market. Many of these policies are outside the scope of the NHHA. Is this appropriate? If not, what policies should be included in the next agreement, and why?

The current Agreement identifies a range of levers, impacting housing availability and affordability, which sit outside the purview of the NHHA but which all impact on the availability and affordability of housing. These include tax levers (negative gearing, capital gains tax discounts, scope for a vacancy tax or bedroom tax), income security (there is currently **NO** housing in Australia that is affordable for someone on Jobseeker⁴⁷), planning levers (inclusionary zoning).

Current policy levers favour acquisition of housing by the wealthy, at the expense of housing creation for those experiencing poverty. As identified previously, “Negative gearing and capital gains tax discounts are conservatively estimated to cost the federal government \$8 billion a year (Select Committee on Housing Affordability in Australia 2008, p. 61). This is more than the federal government spends annually on other housing assistance combined, including \$2 billion for social housing and homelessness assistance (Australian Treasury 2013) and \$4 billion for Commonwealth Rent Assistance (FaHCSIA 2013, p. 61)”⁴⁸

And:

“Current political analysis misses the root cause: high house prices benefit the majority over the minority, and with many voting for parties to protect their property wealth, Australia has been uninterested in solving the inequality problem. It requires drastic action.

We must separate the idea of house from home. A house is property, an investment increasing in value, a possible source of income. A home is shelter, a safe refuge from the world, a domicile. It physically protects and promotes mental wellbeing. Sometimes it is referred to as the third skin.’

Every household, family or single, is entitled to a safe and secure home. We need shelter before property. A home before an income-generating investment. We should ensure that everyone has a home (to buy or rent) before anyone has a second house.

The aim should be to lift home ownership rates from below 65% to above 80%, and to ensure that the remaining 20% can rent equitably within the market, and that those who can’t – the poorest 10% – are protected in properly resourced social housing.”⁴⁹

Then there are social policy levers that impact on the need for housing and homelessness services such as inadequate protections for women and children experiencing family violence, child protection systems that do not address the trauma experienced by children and then cease provision of support once young people hit between 18 and 21 years of age. Ending family violence, addressing poverty, intervening early in housing issues, providing adequate safety nets for people with mental health issues, a housing and support guarantee for young people leaving State care and providing support to families and young people experiencing crises will address the vast majority of factors leading to individuals and families becoming homeless.

In Australia there are insufficient protections for workers and economic imperatives that lead to high underemployment and an overly casualised workforce, both of which contribute to tenancy instability.

A coherent policy response is needed to address the causes of homelessness and housing instability in Australia and to address the shortage in affordable housing, which block resolution to homelessness.

⁴⁷ Anglicare Australia, Rental Affordability Snapshot/National Report/April 2021 (Anglicare, 2021)

⁴⁸ Toohey, S., The Failure of the Housing System, p. 259, in: Chamberlain, C., Johnson, G., and Robinson, C., Homelessness in Australia: An Introduction (Newsouth publishing, Sydney, 2014)

⁴⁹ Wheeler, T., ‘We must separate the idea of house from home’: the case for drastic action on shelter (The Guardian, Sunday 13th March 2022)

A lack of affordable housing is the key driver of homelessness. The Western Homelessness Network has identified the following government policies and practices that contribute to or hinder responses to people experiencing homelessness:

- **Lack of focus on preventative responses:** The key drivers of homelessness are family violence, evictions, poverty and family breakdown; yet government funding is directed to programs that respond to individuals and households once crises hit them, rather than on interventions in these issues, to prevent individuals and households from becoming homeless.
- **Income security levels:** Income security levels are inadequate to cover the costs of housing. This inevitably leads to homelessness, which is costly to the individual and to the community. Punitive Centrelink policies place additional pressure on vulnerable individuals and families.
- **Lack of control on rent levels, rental standards and tenancy rights:** The Victorian Government has progressed amendments to the Residential Tenancies Act in Victoria, but vacancy rates are so low that private rental tenants are still at the mercy of the actions of private property owners and are often afraid to jeopardise a tenancy by reporting breaches to the Act.
- **Inadequate funding for tailored and flexible support provision by homelessness and allied service providers** (i.e. mental health support, Alcohol and other drugs (AOD) support, family support services): Welfare programs receive funding in siloes and generally receive funding for prescribed durations of support. Homelessness, AOD and Mental Health programs in Melbourne's north and west worked together for four years to improve cross sector responses to shared clients⁵⁰ and found that one of the key challenges to collaborative cross sector work was the limitations of the participant sectors' funding models. Funding is time limited and insufficient to enable collaborative practice in responding to the needs of shared clients.
- **NDIS:** There are significant barriers for people with disabilities who experiencing homelessness to accessing NDIS resources. The NDIS 'activity based' funding model discriminates against people with a disability, who are experiencing homelessness. People with disabilities who are experiencing homelessness generally have a transient and chaotic life, with an associated history of complex trauma. These experiences affect the ability of those experiencing homelessness to engage with NDIS services. Their transience means they have difficulty meeting pre-arranged schedules and appointments for activities. Their history of complex trauma means they have difficulty building trust with workers and especially multiple workers undertaking discreet activities. The NDIS funding model relies on the provider agencies undertaking discrete activities with consumers, before they receive funding. This makes it financially difficult for providers to work with clients who have systemic difficulties with service engagement.

Similarly, the NDIS reliance on a workforce model, in which a number of casual workers service one client, discriminates against people with complex trauma who have inherent difficulty with building trust and for whom a more tenacious and assertive approach to engagement is required. (Anecdotally, homelessness services report hearing that individual's NDIS packages are being whittled away with invoices for 'no shows' to appointments.)

- **Child Protection policies and practices:** Child Protection workers often cite the lack of a stable home as a reason for their intervention with a family. Yet, the housing crisis in Melbourne affects family's ability to find affordable housing. The lack of affordable is not in the control of many parents on low incomes. When Child Protection removes children from parents in receipt of Centreline parenting payments, their payments are significantly reduced, leaving them in a catch 22: they cannot afford housing for themselves and their children on the reduced income, but Child Protection will not return their children to them until they have found suitable housing.
- **Young People Leaving Care** – The Child Protection system exits most young people from care at the age of 18, at a time when most young people are remaining at home until 24 years of age, as a result of the current economic situation (unemployment and underemployment of young people and the housing crisis).

Young people generally exit care arrangements with a greater level of trauma and lower levels of independent living skills than young people in the general population do. In addition, they then must fend for themselves in the absence of any familial support. The lack of a housing guarantee on exit from care places these young people in an extraordinarily vulnerable situation.

⁵⁰ See Making Links: *An AOD, Mental Health and Homelessness Partnership*: <http://nwhn.net.au/Making-Links.aspx>

- **Prison release programs** – current bail laws require that a person has access to an accommodate address before they will be bailed. In the absence of a safe address to exit to, people remain unnecessarily incarcerated. It is worth noting that many consumers have reported that gaol is better than homelessness – so some consumers commit further crimes post release in order to be re-incarcerated. It costs approximately \$100,000 to hold someone in prison in Victoria – we could be investing in housing rather than holding them in prison due to a lack of housing options.
- **Lack of community mental health services with ease of access** – The Andrews Government has identified, through the Royal Commission into Mental Health, that the current mental health system is unwieldy and unsatisfactory. Consequently, people experiencing mental health issues do not receive the level of support that they require and so are more likely to fall into homelessness. See Attachment B: *Breaking the cycle of mental health and homelessness: Western Homelessness Network submission to the Royal Commission into Mental Health, July 2019* for further discussion of this.
- **Resources to support people to maintain stable housing:** the length of time that homelessness services now spend assisting people to find stable housing means that there is no capacity to continue to support people into their tenancy. The capacity to support an individual or household who require assistance through the first year of their tenancy would assist in reducing recurring homelessness.
- **Lack of long-term private rental support funds** – the Victorian Government funds a range of private rental brokerage and head leasing programs (such as Family Violence Rapid Rehousing Program and the Private Rental Assistance Program). Programs are not funded adequately to provide ongoing rental subsidies for the many consumers who do not have the financial resources to sustain long-term private rental. Providers of the Family Violence Rapid Rehousing program have found that this program offers stability for families fleeing family violence, until the point that the private rental subsidy runs out. At that point, many of the families can no longer afford the private rental and so face homelessness.
- **Victorian Housing Register policy:** At present households who are on the Victorian Housing Register waiting lists jeopardise their housing status if they explore alternatives such as short-term private rental. This is a disincentive to exploring the sustainability of other options. An amendment to the Victorian Housing Register to enable people to remain on Priority Access Waiting List or Homeless with Support category on the Victorian Housing Register whilst exploring other housing options would ensure that households have a failsafe if those options prove to be unsustainable.
- **Underutilisation of public housing stock:** the limited availability of one-two bedroom stock in Melbourne’s west means that people in larger homes who may be prepared to downsize are unable to do so, due to a lack of suitable stock.
- **Resources for asylum seekers and refugees:** the lack of access to an income and/or financial support severely hinders the capacity of refugees and asylum seekers to source housing.
- **Underemployment, low wages growth and casualisation of the workforce:** Australia is experiencing a period of low wage growth and a decline in employment levels⁵¹. Women and young people are particularly impacted by the increasing casualisation of the workforce, which often leads to underemployment. Income levels are consequently unpredictable and inadequate, in relation to the housing and other costs of living.

⁵¹ Geoff Gilfillan, Statistics and Mapping Section, *The extent and causes of the wage growth slowdown in Australia*, (Parliament of Australia, 9 April 2019)

Policy case study: Intersection between family violence and housing issues

The incidence of family violence in Melbourne’s west is significant. In 2018/19, police reported 13,206 family violence incidents in Melbourne’s west. In the same year, 5,381 households presented to the homelessness service system who reported that they had become homeless because of family violence in the home.

This experience is repeated across Australia. Based on pre-pandemic incidence of domestic and family violence each year approximately:

- 7,690 women a year are returning to perpetrators due to having no-where affordable to live.
- Approximately 9,120 women a year are becoming homeless after leaving their homes due to domestic and family violence and being unable to secure long-term housing⁵².

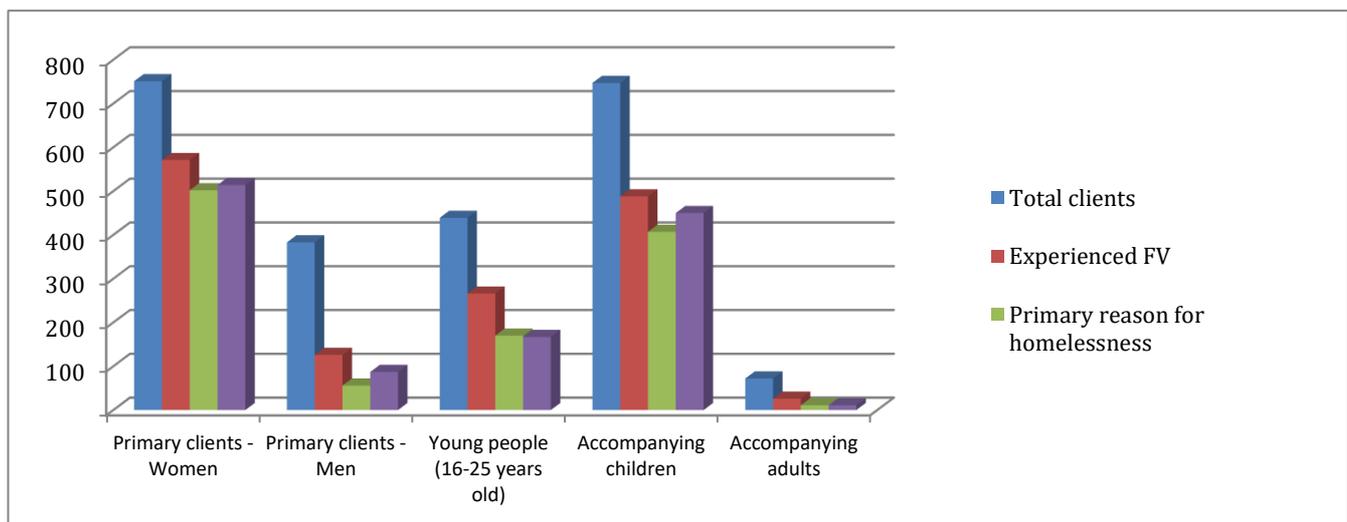
Many women and children leave their home to escape violence without access to an adequate income, which, in combination with the current crisis in affordable housing, severely limits their options for future housing and often leads to women and children becoming homeless.

Consumers cite family violence as **the most common reason** why they seek homelessness assistance⁵³. Approximately 30% of those presenting to homelessness services identify family violence as their main issue¹. However, the Western Homelessness Network (WHN) undertook a data snapshot in 2015 and found that, of the 2,300 individuals supported by the WHN during the snapshot, 62% had experienced family violence and, for 48%, family violence was the primary cause of their homelessness.

Whilst family violence is the most significant trigger for homelessness in Australia, it is the housing crisis that extends periods of homelessness for women and children. Once women feel able to leave a situation of family violence, they often find that they are unable to find affordable accommodation. Single parents are already the most economically disadvantaged group in our community.

It is an extraordinary indictment on our society that, for many women and children, escaping the family home may free them from the violence and control that they have been experiencing, but frequently leads to extended periods of homelessness and serious intergenerational impacts for children and young people.

Figure 6: Western Homelessness Network Family Violence Snapshot, 2015⁵⁴



⁵² Equity Economics, Nowhere to Go (Everybody’s Home, 2021)

⁵³ AIHW, Specialist homelessness services annual report 2020–21 (Web report) [Specialist homelessness services annual report 2020–21, Clients, services and outcomes - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/reports-and-publications/specialist-homelessness-services-annual-report-2020-21) (AIHW, Canberra, 2021)

⁵⁴ WHN Family Violence Snapshot 2015 (WHN, Melbourne, 2015)

6) Performance monitoring and reporting

6.1 How effective is the NHHA's performance monitoring and reporting framework? Do the indicators provide the right information to assess performance against the objective and outcomes? How well do the outcomes and performance indicators link to each other and the objective?

Most of the current NHHA targets only require an 'increase' or 'decrease' against each performance indicator. These measures are vague and will not end the housing crisis.

Performance indicators include such items as 'the stock of social housing dwellings relative to the target population for social housing'. The process for calculating 'target population' is not transparent and there do not appear to have been any consequences for Victoria, which has the lowest rate of social housing per capita in Australia. This a rate that is clearly below the level of need, as indicated by the 54,587 households on the Victorian Housing Register, awaiting social housing (over half of whom have been approved for priority access)⁵⁵.

The NHHA does not include targets (outside funding allocation) for Federal action and places the onus on states and territories to achieve the measures identified to 'improve the housing outcomes' for Australians.

The Network is of the view that current funding levels, under the NHHA are inadequate to achieve significant improvement in the areas stipulated by the Agreement.

6.2 What are the data development priorities? What needs to be done to progress data development?

Availability of timely localised data reports, as defined by the States/Territories remains a challenge. For instance, community services in Victoria are divided into nine regions. A Homelessness Network operates in each region to ensure effective coordination of homelessness services in that region, for the benefit of clients. Homelessness Networks in Victoria had to purchase data relating to their regions at a cost that is beyond the Networks on a regular basis. Yet this data is so critical to localised planning and sector development.

6.3 Are there better ways to measure progress towards achieving the objective and outcomes of the NHHA? What should the performance framework be for the next agreement?

The performance framework for the next Agreement should be based on targets resulting from agreed strategies to end the housing crisis, such as reporting on the number of affordable dwellings compared with the population, on policies aimed at assisting people on low incomes to purchase their own homes, stability and affordability of private rental, construction of social housing relative to need.

The development of an outcome framework for homelessness services has been discussed for many years. The Commonwealth/State Homelessness Performance Indicator Working Group identified in the 1980s that outcomes indicators are not appropriate in relation to homelessness because so many outcomes for people experiencing homelessness are beyond the control of the homelessness sector. For instance, availability of sufficient affordable housing, income security, health responses, availability of sufficient family violence, mental health, AOD responses, educational opportunities.

Homelessness services are 'process' services. The focus of homelessness services is on appropriate case management practice, which enables individuals to move towards their goals. – homelessness services do not control the key factors that will impact outcomes for consumers, such as access to affordable housing or an adequate income.

More appropriate targets would focus on the broad levers available to Federal and State Governments:

- Construction of a defined number of social and affordable housing properties (as identified by need).
- Construction of social housing sufficient to meet demand. Why is 4% of housing in Australia social housing, whilst 80% of housing in Singapore is social housing?
- Period of time that individuals are homelessness (a greater focus on housing first opportunities should significantly reduce the period of time that people experience homelessness).

⁵⁵ Homes Victoria, Total number of social housing applicants on the Victorian Housing Register - December 2021 (Homes Victoria, Melbourne, 2022)

7) Financial and governance arrangements

7.1 How well do the funding arrangements support governments' shared objective, outputs and outcomes under the Agreement? Has the NHHA improved transparency and accountability of homelessness and housing spending? Are there aspects of the funding arrangements that could be improved? For example, would more (or less) flexibility around how the funding can be allocated by the States and Territories make it easier to achieve the agreed outcomes?

Joint Commonwealth/State funding agreements are critical when the levers for affordable housing and an end to homelessness are held jointly across the States/Territories and Commonwealth.

Current funding arrangements do not tie levels of government to achievement of outcomes, only to 'improvement' across outcome measures.

7.2 Are the conditions for Australian Government funding under the NHHA sufficient to achieve the outcomes of the Agreement?

The level of funding available under the Agreement is not sufficient to achieve the outcomes of the Agreement, as evidenced by the growing number of households experiencing homelessness, the number of households awaiting priority access to social housing and the growing number of households experiencing rental and mortgage stress.

7.3 Are the governance structures under the Agreement adequate and effective?

It is not clear what the consequences are if either party does not adhere to the Agreement or how consequences could be managed in such a way that the recipients of NHHA funding are not disadvantaged.

8) How does the NHHA align with other policy areas?

8.1 In what ways does the NHHA intersect with other policies, agreements and strategies? Are there changes that could be made to ensure the NHHA is better aligned with them?

See response to question 5.4.

8.2 What barriers do people with disability face securing affordable, safe and long-term housing (including barriers to home ownership and securing private rentals and social housing)?

See response to question 5.4.

9) Homelessness

9.1 How effective is the homelessness service system at improving housing and non-housing outcomes for people who are homeless or at risk of homelessness?

The NHHA does ensure that a level of State/Territory and Federal Government funding is directed to provision of homelessness services. The core of this funding is directed to homelessness case management services, providing support to those experiencing homelessness and/or family violence to find long term housing and to address any issues contributing to their experiencing of homelessness or that will impact on the stability of future housing. These services are critical whilst there are people experiencing homelessness in Australia. So, enshrining allocation of these funds through a Commonwealth/State Agreement is critical.

In 2020/21 the Western Homelessness Network assisted 15,075 households⁵⁶. Of these 10,364 households received case management support.

However, recent data shows that the Western Homelessness Network was only able to assist 17% of households move out of primary homelessness at the end of their support periods. This is a reflection on the impact of the housing crisis on consumer outcomes⁵⁷.

Further evidence of this is provided by the 2022 Productivity Commission Report on Government Services, which identifies that, in Victoria, 29.8% of consumers had an unmet accommodation need at the end of their homelessness support period, whilst only 2.5% had an unmet non accommodation need⁵⁸.

9.2 Has the NHHA contributed to improved outcomes for people who are homeless or at risk of homelessness?

The NHHA has contributed to improved outcomes for people who are experiencing or at risk of homelessness, by ensuring that both State/Territory and Federal Governments make some level of investment in responding to those experiencing homelessness.

However, when the Supported Accommodation Assistance Program (SAAP) was created as the national program to respond to homelessness and family violence in Australia, the program was designed to be 'program of last resort', picking up those people who fall through the gaps of all other system.

16,487 people presented to the homelessness service system in Melbourne's west in 2019/20 – these numbers are clearly greater than the numbers of people who are likely to have 'slipped through the gaps' of other systems.

As the housing crisis has grown, support to consumers to try to access the extraordinary lack of appropriate and affordable long term housing options has become the key focus for homelessness support providers, leaving very little capacity for innovative responses to the broad range of issues facing households who have experienced homelessness.

If sufficient affordable housing was to be constructed, the homelessness sector could return to supporting those who 'fall through the gaps' to access housing. Current levels of homelessness support resourcing may be sufficient when sufficient affordable, long term housing is available or could be directed to more productive preventative activity, including responsive support to assist people to maintain tenancies.

At present, only 11% of those people presenting to the homelessness access point services will be able to access case managed support, as support resources are so stretched. For instance, approximately 400 people are waiting for case managed support in Brimbank and Melton. Consumers wait for an average wait time of 5 months for access to

⁵⁶ Homes Victoria, LASN data 2020-21, Quarter 4
Homes Victoria, Melbourne, 2021)

⁵⁷ Homes Victoria, LASN data 2020-21, Quarter 4
Homes Victoria, Melbourne, 2021)

⁵⁸ Productivity Commission, Report on Government Services 2022
(Productivity Commission, Canberra, 2022)

support; Sunshine can be up to 12 months...even longer for long term case management and for mainly for singles.

Case study: Bart's story – Medium term impact of homelessness sector intervention

While Bart was living in private rental accommodation, he jointly invested in a business venture with another person, who he trusted. However, this person misappropriated the business funds, ultimately leaving Bart with no money and no income. He was unable to afford to pay his rent, could not maintain his tenancy, and so started living in his car.

Bart lived in his car for four years, despite regularly seeking help from his local homelessness access point. The only assistance that the access point service could provide was to fund one or two nights respite in a motel. After that, Bart would have no other option but to return to his car. Bart got to the point he no longer felt able to cope and was considering suicide. He felt enormous shame about his situation, about the indignity of having no home, of having nowhere to toilet or shower, the extreme difficulty of managing his health without cooking facilities or adequate space to rest, and the inability to source employment whilst in such a setting.

Eventually a transitional housing property became available, which included the provision of case management support. Bart has now lived in his transitional housing apartment for three years, and, because of this period of stable housing and support, is recovering from the trauma of homelessness, and has been able to face his surrounding issues. He has been able to resolve some legal matters and is nearing resolution of others. Bart has stabilised his finances, is addressing a number of physical health needs with a local GP, and regularly attends local drop in centres, where he is able to share time and experiences with others. Perhaps most importantly, Bart has been able to overcome the shame he was feeling so has been able to re-establish relationships with his family and is accessing psychological treatment to address issues stemming from his childhood.

Although the current tenancy is highly suitable for Bart's needs, it is unfortunate that he remains on the waiting list for long-term community or public housing via the Department of Health and Human Services. As he is yet to obtain housing permanency, the transitional property cannot be utilised to afford another individual experiencing homelessness the opportunity Bart has received.

Bart very frequently expresses how much transitional housing and support has changed his life, identifying that he does not think he could have coped, or worked on the fundamental areas of his life without it. Bart's support workers are impressed with how hard Bart has worked, and that he has had the courage to confront and address the challenges he has faced.

Case study: Tom's story - Impact of homelessness sector intervention and social housing

Tom was bailed on 19/03/2019 and referred to a homelessness access point in Melbourne's West. The Initial Assessment and Planning (IA&P) worker explored local shared accommodation options [private low cost rooming houses] and found that Tom was banned from using the largest shared accommodation provider and no other vacancies were available with any other provider. The IA&P worker secured a room in a motel room for the interim in the hopes that a vacancy would become available in the few days following.

Upon meeting with Tom, the IA&P worker established that shared accommodation would not be suitable for Tom as an assessment identified extreme vulnerabilities. Tom advised that he had been in shared accommodation previously and had a bad experience of being targeted and assaulted in that accommodation. Tom said he feels unable to compete with "able bodied" people.

Tom requested accommodation near to the area where is his awaiting eye adjustment surgery. Tom reported that he was attacked when he was sleeping rough in 2017. His face caved in after he was kicked in the head and face. Tom was hospitalised and placed into a coma where he remained for some time to recover. Tom sustained an ABI, loss of sight and underwent facial reconstruction. As a result, he is now legally blind with only 30% vision in one eye and no vision in the other. Tom uses a blind stick as a guide. He has no family that can support him with accommodation as his parents and two (2) brothers have since passed away.

After he left hospital, Tom started sleeping rough again, prior to a short stay in a crisis facility. It was then that he reports that he began using drugs to cope with feeling so lonely and depressed. Tom was embarrassed to report being in a drug-induced psychosis on a Friday afternoon to which he said he had begun to smash cars outside of the crisis accommodation and exhibiting anti-social behaviour. Tom was incarcerated on or around 19/01/2019.

Tom said he has been diagnosed with PTSD, Chronic Fatigue and Depression. He said that he suffers from short-term memory loss and often loses track of time. Tom reports difficulty in using public transport, crossing busy roads and identifying people.

The homelessness access point worker was finally able to find accommodation for Tom in a community managed facility. Tom was extremely grateful for all the hard work undertaken by his support workers and says that he is very happy and comfortable at the community managed facility where he said that he finally feels safe and secure with the around the clock staff at the facility.

9.3 How has COVID-19 affected people who are homeless or at risk of homelessness? Are there lessons from the responses to COVID-19 for addressing homelessness over the longer-term?

Definitely – COVID-19 highlighted the high numbers of Australians who do not have a home, so do not have a safe place in which to isolate when needed. The pandemic also highlighted the high numbers of Australians living in inappropriate, sub standard accommodation, which is detrimental to their health and wellbeing – exposure to COVID-19 being only one of the daily challenges to health and wellbeing impacted these individuals.

COVID-19 highlighted the lack of appropriate and effective emergency accommodation options for those with no safe place to live. As a result, State/Territory governments spent \$Ms providing temporary shelter in hotel/motel accommodation. These funds should have been spent on provision of appropriate, safe, affordable long term housing

9.4 What changes should be made to homelessness services to improve outcomes?

The key changes that are required to homelessness services to improve outcomes are:

- Provision of housing first models with housing and linked support provided at the earliest possible point in an individual or household's experience of homelessness.
- Flexibility of funding arrangements enabling provision of support that is responsive to the individual need of consumers.

9.5 What changes should be made to homelessness-related governance and funding arrangements to improve outcomes?

The key barrier to effective homelessness responses is the lack of affordable and appropriate housing options. This leads to significant 'churn' through the homelessness system, which is costly to the individual and the community.

Construction of adequate affordable housing stock will have the most significant impact on outcomes for individuals and households experiencing homelessness.

Direct changes to homelessness related governance and funding arrangements to improve outcomes can be achieved by the strategies identified above:

- Tying provision of support to housing to facilitate housing first models, provided at the earliest possible point in an individual or household's experience of homelessness.
- Flexibility of funding arrangements enabling provision of support that is responsive to the individual need of consumers.

A central homelessness service in Victoria, Launch Housing, has undertaken a comprehensive analysis of interventions to support people experiencing homelessness who are experiencing a complex range of issues. Recent research into evidence based interventions undertaken by Launch Housing suggests that support for people with the most complex needs has the following characteristics:

- flexibility of response
- coordination amongst allied providers
- support linked to accommodation; and
- care at critical stages of transition.
- intervention.

They conclude that:

"A large number of service interventions were assessed in the literature search and the project looked at all, but places a premium on, the most robust research designs... Despite being targeted at slightly different groups, with slightly different interventions, all carried a similar thematic consistency to their solution. The key elements that the most successful interventions shared was an holistic approach that included a rapid transition into stable, affordable and safe accommodation, as well as intensive, targeted, multidisciplinary support, delivered over key transition periods along the course of a journey to self-sufficiency. The support is designed to meet the needs of the client as required and build the capacity of the individual to develop their autonomy in maintaining their housing situation."⁵⁹

The Western Homelessness Network has previously identified a range of strategies that would assist in improving outcomes for people experiencing, or at risk of, homelessness:

- More funding should be allocated to prevention and early intervention responses that can provide assistance prior to an individual or household becoming homeless, in the hope that homelessness can be prevented.
- The Specialist Homelessness Service system assists individuals and households who are particularly vulnerable. Homelessness is often caused by, and always leads, to an experience of trauma. Homelessness triggers mental health issues for some people and can lead to substance use to manage the associated trauma. These issues, in turn, create additional complexities. Adequate housing first models with 'wraparound' support services, are needed to support people whose lives have become chaotic.
- To assist people in maintaining affordable housing tenancies, there must be a recognition that services, government and other stakeholders need to be flexible. People who have experienced homelessness are more likely to have experienced trauma as a cause or consequence of homelessness, either had mental health illnesses, or developed them while experiencing homelessness, have low-income security and face a myriad of challenges⁶⁰. Core to assisting consumers to maintain their tenancies into the future is sufficient support

⁵⁹ Launch Housing, Frequent Service User Research Project, Annotated Bibliography and Literature Analysis (Launch Housing, Melbourne, 2016)

⁶⁰ WHN 2019a, p. 3.

capacity to assist consumers to resolve the challenges they have faced and recover from the trauma associated with an experience of homelessness and sufficient flexibility to allow for the fact that this is not a linear process.

- The State Government has taken positive steps to increase tenancy security, however the SHS is still insufficiently funded to provide support for people to maintain tenancies.
- Appropriate and wraparound support should be available for those who have experienced homelessness, once they are housed, that has the flexibility to ramp up and down as needed and for as long as needed will significantly increase the likelihood of sustained tenancies.
- Sufficient funding for cross sector support is required to enable people experiencing homelessness to access a range of support services when they are ready, to assist them to stabilise crises.
- Homelessness support services should be sufficiently funded to support consumers for longer periods of time, in order to assist them to stabilise in any new tenancy.
- Place based support can assist tenants to engage with their local community and can respond to changing levels of need for support.
- The system funds homelessness services at the front end and Tenancy Plus when tenancies are at risk – but no-one is funded for proactive support to help people stabilise and maintain their tenancies.
- There are no services in the community sector (outside the NDIS) are funded to provide ongoing support to those people who will always need either a level of support or episodic support. Funding is required for services that can provide ongoing support to those who need it.
- Proactive and reactive support – when establishing a tenancy support needs to be proactive. Once a tenancy is stabilised, reactive/episodic support that is easily accessible will assist tenants to address issues before they escalate.
- Sometimes clients don't want to continue to engage with support services once they access their housing, but they are likely to return to the services that they know if issues arise. Homelessness services are not adequately funded to provide this responsive support.
- The establishment of a stepping stones approach would be constructive for many young people. We need more supported housing options for young people, that are flexible enough to allow for increasing independence for young people over time. More social housing could be developed using the foyer model: independent living units with onsite support for young people. Many young people need a period of support (around 2 years) to create stability in their lives and to build their living skills, with built in capacity for young people to move to greater independence over time. Such a model is particularly required targeting those young people with entrenched behaviours who will require ongoing support until they are 21 -25 years of age. Ideally this would be a 'foyer' model for young people with known problematic/challenging behaviours who have limited ability to access private rental and who are not engaged in education/training, as a result of their experience of trauma
- Stepping stones approaches could also be applied to use of bedsits and community managed rooming houses with onsite support – offering an initial tenancy for single people whilst their situation stabilises, with an automatic transfer approval into independent housing.
- We need more targeted and appropriate responses for people experiencing complex issues that have led to the development of difficult behavioural issues. At present, social housing tenants in this situation either contribute to a poor tenancy experience for other tenants or they are evicted – which doesn't help them or the community. We need housing constructed in a way and in locations that reduce the impact of tenancies on other community members, with linked on site support services to assist tenants to stabilise.

9.6 What should be done to improve the identification and measurement of homelessness in Australia, and to improve data on homelessness service system users and their outcomes?

Improvements to the unmet demand component of the SHS Data Collection and to the collection of data from high volume agencies would improve our understanding of the number of people experiencing homelessness who are seeking support.

9.7 How could the next national agreement be designed to better address homelessness in Australia?

The main way in which the next national agreement could be designed to better address homelessness in Australia would be to ensure that the Agreement commits all levels of government to ensure adequate affordable, stable housing exists to prevent people becoming homeless and to ensure timely access, with linked support, to appropriate housing for those who do become homeless.

A secondary strategy would be to ensure government attention is focussed on addressing the drivers of homelessness: inadequate income security, family violence, trauma, poverty, family breakdown, unstable and under employment.

Responses from those with lived experience

Each year the Northern and Western Homelessness Networks survey consumers about their experiences of homelessness and the homelessness service system. The 2018 survey focused on consumers' experiences of homelessness and on the impact of a lack of housing. As State and Federal elections were occurring in 2018/19, we asked consumers what they would like us to tell the Premier and Prime Minister on their behalf.

Here are some responses:

Question 8: How could your experience of homelessness have been avoided?⁶¹

Theme	Women #	Men #
Affordable housing	36	14
More homelessness support workers	12	3
More information on services available to help	5	
More transitional housing		4
Raise community awareness	4	
Stop discrimination (private rental)	4	
Stop family violence	4	
Assistance with private rental		3
Stop putting people in rooming houses	3	3
Accommodation certainty	3	
Better early family life	3	
Better education	2	5
More information about services to help		3
More family support		2
More support whilst in prison		2

⁶¹ Northern and Western Homelessness Networks, Annual Consumer Survey 2018, Consumer experiences of homelessness and the homelessness service system (NWHNs, Melbourne, 2019)

Imagine you are now sitting with the Prime Minister of Australia or the Premier of Victoria – what would you tell them about the experience of homelessness or risk of homelessness?

Theme	Women #	Men #
Build/create more housing (affordable/social)	48	14
Build your understanding of the reality of homelessness	24	23
Help people who are homeless/your citizens	10	5
Fund more support services	5	5
Provide a liveable income	3	
Fix the housing market	3	
More crisis accommodation near services		3
Other: More services for young people, Create more jobs, Clean and safe services open 24 hours, More stock like transitional housing		

What would you tell the Prime Minister/Premier?

- *Housing prices are out of control, has been for over a decade. Even basics in life (e.g. food, groceries, public transport, electricity/gas prices) are way more expensive than other 1st world countries. When found with a reduced income this makes like almost impossible to live as a normal person.*
- *I can write a book but need housing*
- *The worst situation you would experience except illness is not to have a shelter for you and your family. We need more organisations that can help these people in need.*
- *It is ridiculous how the rental market is and we should have affordable housing.*
- *They need to get off their backsides and do something about it. Provide more housing. So many ministry houses seem vacant - system's not run well.*
- *To have a real look at how bad the situation has become with homelessness.*
- *Australia is a big country with not enough housing. Please provide more stable and affordable housing for people. This can include OoH, community housing or private rental.*
- *Need to look after the people - low income people. Living costs are expensive. We need houses. Look after the children/education/wellbeing. Need to be in touch with homelessness and give more support.*
- *How would you like to be homeless for 5 years without your kids?*
- *Homelessness is not only not having a roof over your head but it has a big impact on your mental status because you felt like you are not equal to other people. You are at the bottom of society.*
- *That it is horrible and we need more houses.*
- *It can be avoided - please help!*
- *Homelessness is something that nobody should experience and when it happens, it can be unexpected and there is not enough support for people in need. Housing is an entitlement, not a dream.*
- *Every human being, no matter race, colour, have a heart and soul. Every single person has a story. We don't become homeless because we want to. I had a house, car, worked until my partner's suicide. Now nothing.*
- *It's frustrating, it's depressing, it's demoralising and just makes my health issues worse.*
- *I would like him to stay a night where they are asking my kids and myself to stay. And then ask would he want himself or his family to stay in these conditions. I don't think he would stay a night*
- *It was the hardest time I have been through in my life and should be more support and help for people that find themselves in this situation, it could happen to anyone.*
- *We need more housing. More, larger, affordable housing in our area.*
- *It is not fair my son and I are homeless. We need a house. My son deserves to be safe.*
- *When you are homeless you never feel safe, who will hit you or where you are. When you have a government house, you feel safe even if you have no food.*

- *There needs to be more public housing or other affordable options. We need more choice about where we want to live*
- *Families experiencing homelessness need more help so their children are not homeless too.*
- *Build more houses and create new jobs so people are kept busy and engage in beneficial things for themselves and also the community*
- *We needed more crises accommodation and places that homeless people can go. There also needs to be more public housing or affordable housing. As private rental is the only option for low income earners and sometimes it's just not possible to survive on little income from centrelink and then have to pay most of my income on rent.*
- *I have had a bad experience while being homeless and i would like to urge you that, people need home to call their own and they are facing difficulties because there is not enough houses in Melbourne. We are facing difficulties in homelessness because there is no enough houses to be provided to us that's why it takes ages to find something.*
- *There needs to be more housing for young people*
- *Being homeless is very stressful and it is no good for children and families to be without a safe place I want them imagine how they would deal with this situation and what they would say to their children*
- *Absolutely horrific and there are no words that can describe it. I can understand now why so many people just give up, it's so sad. It could so easily be resolved - just buy some more houses, there are so many vacant properties and buildings, why can't these be donated or bought. These places could house so many people. It is so cold at night time and there are so many people doing it, it's unbelievable.*
- *Fix the cause of homelessness, not just band aid solutions. Affordable accommodation, affordable services, not a one size fits all approach*
- *That the despair and loneliness that you encounter is second to none. I would need much more space and time to explain to them exactly how they need to distribute funds to the right facilities.*
- *There are numerous empty dwellings and an over abundance of new units being built. Mainly investors sitting on the properties. Create some discussion in Parliament in relation to this - also squatter's rights.*
- *It's a very lonely place to be. The feeling of helplessness can be very depressing. Crime was my only financial option.*
- *It sucks! We need help. We are human and we deserve it just like everyone else.*
- *It's not fair for kids too ever feel this pressure. They shouldn't have to ever feel a doubt about a roof over their head or a meal in their stomach. They should be worried about kid things*
- *You need to give more help. I lost my job because of my health and now I am losing my home because I don't have enough money. Rent is too high and my Centrelink doesn't cover all my costs*
- *The Government needs to be smarter with their money to help people on the streets.*
- *Everyone deserves a place to call home.*
- *I wouldn't wish the feeling on my worst enemy.*
- *How can I get a job if I cannot go to school and cannot have a safe home.*

10) Social housing

10.1 What are tenants' experiences moving into, within and out of social housing (including time on waiting lists)? Does the social housing system provide tenants with opportunities for economic and social participation?

Yes, social housing provides tenants with greater opportunity for economic and social participation by providing stability. The lack of safety and stability are core components of the devastating impact of not having a home. People with lived experience who accessed assistance through the Northern and Western Homelessness Networks in 2018, identified the following impacts of a lack of a safe home on their lives:

What impact has homelessness, or the risk of homelessness, had on your life (and on your children's life, if you have children)?⁶²

Theme	Women #	Men #
Stress	28	
Financial stress	16	5
Not being able to protect children; poor diet, disrupted schooling, no schooling, no toys, scary unpredictable accommodation	24	
Mental Health deterioration	10	11
Fear	9	
Anxiety	8	
Stress		8
Increased AOD use		8
Physical Health deterioration	7	
Depression increased	7	5
Traumatic	6	
Isolation	6	4
Couldn't plan or organise		5
Family breakdown; children taken into state care; partner leaving them		4
Education disrupted		4
Loss of self worth, confidence		3

10.2 What are the economic and social benefits and costs of social housing? Are there changes that could be made to improve the effectiveness of the social housing system so it has a more positive impact on people's lives? What changes could be made to make the social housing system more equitable for tenants and better targeted to people in greatest housing need?

Julie Lawson et al, have identified the potential cost associated with government construction of sufficient social housing to meet need:

"Investment in other forms of social infrastructure, such as schools and hospitals, is typically based on the spatial distribution of need over time. Historically, this has not been the case for social housing. We analysed the extent and spatial distribution of need for social housing and the cost of its procurement in 88 different land and construction markets across Australia. The results show that over the next 20 years, 727,300 additional social housing dwellings will be required, with current-price procurement costs varying from \$146,000 to \$614,000 per dwelling, depending on local land values, building types and construction costs in different regions."⁶³

⁶² Northern and Western Homelessness Networks, Annual Consumer Survey 2018: Consumer experiences of homelessness and a lack of housing (Northern and Western Homelessness Networks, Melbourne, 2019)

⁶³ Lawson, J., Denham, T., Dodson, D., Flanagan, K., Jacobs, K., Martin, C., Van den Nouweland, R., Pawson, H. and Troy, L. (2019) Social housing as infrastructure: rationale, prioritisation and investment pathway, AHURI Final Report No. 315, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/final-reports/315>,

Arguments for the economic benefits of social housing are complex. Again, Lawson et al identify that:

“While there is a strong historical precedent to regard the social housing system as making a broad social and economic contribution by promoting decent living conditions for all Australians regardless of income, social housing is still largely judged as a service to disadvantaged households reliant on government benefits. This categorisation of social housing means arguments to cast social housing as a necessary component of urban planning have yet to gain traction. At a time when governments prioritise reducing tax rates and discretionary spending, there is little enthusiasm for increasing investment in affordable housing for disadvantaged communities.”

SGS Economics have argued that construction of social housing is an important stimulus activity, creating employment and boosting the economy. They also identify that greater supply of social housing can be expected to have flow on economic impacts, as:

- Modest income workers can live closer to their jobs
- Families can have security of tenure
- Children a more stable education
- Overall improvements to health and wellbeing from quality, affordable housing will increase the productivity of workers.⁶⁴

The benefits to the individuals who are accommodated through social housing are clear but there are also benefits to the community, arising from:

- Reduced demand on community services
- Reduced crime
- Reduced trauma resulting in reductions in mental ill health and substance use.

10.3 How well is the social housing stock used and managed? Are social housing tenants satisfied with the condition, amenity and location of their properties? Do tenants feel safe in their social housing properties? Do the non-housing services provided to social housing tenants meet their needs?

Target stock to need

- Lack of growth in social housing has meant that social housing developments have not kept up with changing need. Construction of sufficient social housing is required so that available stock corresponds with the needs of specific cohorts i.e., stock sufficient to house families of different sizes with facilities relevant to families; singles stock sufficient to need.
- There is a lack of social housing stock in the West for single people, for large families, for people with complex behavioural issues and a lack of stock appropriate to young people, particularly those experiencing complex issues.
- The current community housing funding model precludes access for young people and for those on Jobseeker. Yet there are no private rental properties in Victoria that someone on Youth Allowance or Jobseeker can afford. Creating new housing projects which are suited to young people who have or are at risk of experiencing of homelessness is a way to both create a positive community where young people with similar lived experience can create beneficial relationships and reduce homelessness cycles beginning at a young age. These housing developments could be situated near, or contain with employment assistance, and learning options for these young people to engage with and begin to actively contribute to the community.
- 500 young people leave State care in Victoria each year. Research shows that the majority of those people most recurrently homelessness and recurrently incarcerated became homeless before they turned 18 and came from the child protection system. Let’s break that cycle! Appropriate, guaranteed social housing should be available for

⁶⁴ ⁶⁴ SGS Economics and Planning, Economic Impacts of Social Housing Investment
(Community Housing Industry Association, 2020)

young people leaving care to provide them with the maximum opportunity for housing stability once they leave care.

- A history of trauma can, for some people, lead to anti-social behaviour. Social housing providers receive high numbers of neighbourhood complaints but don't have sufficient capacity to address the underlying issues causes behavioural issues.
- We need more targeted and appropriate responses for people experiencing complex issues that have led to the development of difficult behavioural issues. At present, social housing tenants in this situation either contribute to a poor tenancy experience for other tenants or they are evicted – which doesn't help them or the community. We need housing constructed in a way and in locations that reduce the impact of tenancies on other community members, with linked on site support services to assist tenants to stabilise.
- Many more 'Commonground' models of social housing (stable housing with onsite support, security and allied services) are needed to provide a safe and supportive environment for people experiencing complex issues, who may always need a level of support to assist them to live independently.
- The current dearth of social housing properties means that tenants have very little choice about the location of their housing. The ability to house people near to their communities and the community facilities and services that they access will dramatically improve their wellbeing.

10.8 Are there issues relating to COVID-19 that social housing providers will need to build into future development and maintenance plans?

Yes, COVID has further highlighted the negative impact for tenants in congregate facilities and dwellings with shared facilities.

11) Affordable housing and assistance for low-income renters

11.4 What is the most cost-effective way for governments to assist low- and moderate-income private renters? Are the schemes targeted to the right people?

Research suggests that provision of adequate levels of affordable housing can be most cost effectively achieved by government construction of public housing⁶⁵.

11.5 What role should private rental brokerage services play? What evidence is needed to understand the role of these services?

The increasing reliance on the private rental market to create affordable housing options has led to establishment of 'workarounds' as a focus of new funding allocations. For instance, Victoria had a Private Rental Brokerage Program, then added on a Private Rental Access Program, followed by a PRAP plus program – all designed to provide people with financial support to access private rental. If sufficient affordable housing existed, such financial support would be unnecessary. Funding allocated to these programs would be better directed to establishment of affordable housing options.

12) The private rental market

12.1 How well is the private rental market working? How does the private rental market differ between urban, regional and rural areas? Does the NHHA (and the bilateral agreements complementing it) adequately address issues in the private rental market?

- Private rental is not a secure option for those on low incomes. As home ownership becomes more expensive, those seeking to save to purchase a home are competing with those on lower incomes for the most affordable private rental.
- Security of tenure does not exist for those in private rental. This leads to a precariousness of housing, and unnecessary additional stress, for people in insecure employment and for those experiencing episodic health issues, which impact their capacity to work.
- Women stay in situations of family violence because of a lack of affordable alternative housing and because they do not have sufficient financial resources to manage private rental, previously covered by two people.

13) Housing outcomes for Aboriginal and Torres Strait Islander people

The Western Homelessness Network strongly supports any strategies to improving housing access and security for Aboriginal and Torres Strait Islander people. At present Aboriginal and Torres Strait Islander people are over-represented in the Victorian community at a rate 12 times higher than their representation in the broader community.

Aboriginal Housing Victoria has identified that:

- In 2018 17 per cent of Aboriginal people in Victoria sought assistance from a homeless service
- 44 percent were already homeless and the remainder were at risk of homelessness
- Those in need of a homeless service has grown by 34 percent in 4 years
- 10 percent of Victorians who are homeless are Aboriginal
- If the mainstream sought homeless assistance at the same rate this would be equivalent to more than 1 million people⁶⁶.

The Network supports the strategies outlined in the Victorian Aboriginal Housing and Homelessness Strategy.

⁶⁵ Julie Lawson et al., Social housing as infrastructure: rationale, prioritisation and investment pathway, ob. cit.

⁶⁶ Aboriginal Housing Victoria, Victorian Aboriginal Housing and Homelessness Strategy (Aboriginal Housing Victoria, Melbourne, 2020)

14) The supply side of the housing market

14.1 What evidence is there that housing supply is (or is not) keeping pace with demand in the housing market overall or in particular submarkets?

Plan Melbourne has identified that construction of 1.6M new properties will be necessary in Melbourne by 2051 in order to keep up with current demand⁶⁷.

Transforming Housing, in their report Project 30,000 identifies that Victoria faces a shortage of at least 164,000 housing units that are affordable and available to very low and low-income households.⁶⁸

Everybody's Home, a national housing campaign has identified that:

- "There's currently not enough supply of affordable rental housing. AHURI estimate the current shortfall of social housing at 433,400 properties, growing to 727,200 by 2026.
- Research by Equity Economics estimates that 7,690 women a year are returning to domestic violence perpetrators because they have nowhere affordable to live, and 9,120 women a year become homeless after leaving their homes due to domestic and family violence and being unable to secure long-term housing (No Where to Go).
- Federal Government investment in social and Indigenous housing is not keeping pace with population growth with investment in 2022-23 budgeted to be the same as in 2012-13. Since this time Australia's population has grown 13.2% and our social housing stock has grown only 4.5%. (Productivity Commission ROGS 2022) ⁶⁹

14.2 Is the NHHA national performance indicator on 'total number of dwellings relative to the population' the right measure of how well housing need is being met?

This measure is not an adequate determinant of need. More responsive targets would be based on housing need, as determined by both the Socio-Economic Indexes for Areas (SEIFA) index and data on the cost and availability of housing.

15) Planning and land use regulation

15.1 Are there changes that could be made to planning and land use regulations to improve housing supply responsiveness? To what extent has the NHHA driven or encouraged planning and zoning reforms, including inclusionary zoning and land release strategies? Are there other strategies or vehicles that could be used to achieve progress on land use planning reforms?

The NHHA has not encouraged planning or zoning reforms because of its limited focus on provision of funding to homelessness and social housing provision. A NHHA based on a National Housing Strategy would encompass the full range of levers driving and impacting the housing crisis, including those related to planning and zoning.

Local Councils that have trialled inclusionary zoning policies in Victoria have found these trials to be challenging in the absence of a statewide mandate and consistent expectation amongst housing developers. This mandate could be embedded in a new national agreement.

⁶⁷ *Victoria in Future 2016* and Department of Environment, Land, Water and Planning, internal analysis, estimated employed persons derived from *Victoria in Future 2016*, quoted in Victorian State Government, *Plan Melbourne 2017 – 2050*, (Victorian Government, 2017).

⁶⁸ Palm, M., Raynor, K., Whitzman, C., Project 3000: Producing Social and Affordable Housing on Government Land (Transforming Housing, University of Melbourne, Melbourne, 2018)

⁶⁹ Everybody's Home, Federal Election Platform 2022 (Everybody's Home, 2022)

15.2 How effective have inclusionary zoning requirements been at increasing the stock of social and affordable housing? Have State and local governments faced any issues implementing these requirements?

There are only limited examples of inclusionary zoning in Australia and, in most cases, these are based on voluntary systems. Victoria does not have mandatory inclusionary zoning policies, although numbers of Local Councils have requested this.

A study of inclusionary zoning for Ms Katie Hall MP, Member for Footscray identifies:

“England offers a suitable case study in terms of inclusionary zoning policies as the country has one of the longest standing forms of inclusionary planning laws; the 'Section 106' agreements. Section 106 refers to the relevant section of the 1990 town planning legislation in England. The policy 24 allows authorised local agencies to negotiate with developers, to produce planning obligations that deliver affordable housing (Gurran et al 2018, p.13). This program has been very effective in producing new affordable homes. Since the law's implementations in 1990, it has contributed many tens of thousands of units. In 2005-06, the agreements were responsible for 17 per cent of total affordable housing output in England (Gurran et al 2018, p.13). The program is also successful at meeting local demands. The policy falls under a national framework which facilitates moulding of IZ to local needs by the negotiations occurring with local authorities who analyse where affordable housing needs are present and set targets and agreements with builders (Gurran et al 2018, p.13)“

“Inclusionary zoning (IZ) has proven to be very effective in producing affordable housing (Been, Schuetz & Meltzer 2009). California has the most extensive IZ laws in America with both state and local governments policies (Poweel & Stingham 2005, p.475-477). These policies combine to include mandatory targets with density bonuses offered throughout the state. It is estimated that 34,000 affordable houses were built by 2010 (Mukhia et al 2010 p.251). “⁷⁰

The Australian Housing and Urban Research institute concurs, but warns that, whilst inclusionary zoning has potential as “a means of integrating affordable homes within wider planning and development processes...inclusionary planning approaches should never be seen as an alternative source of funding for social and affordable rental housing provision. “

“Inclusionary planning tools leverage significant quantities of affordable housing supply in many parts of the UK and US. Around 43 per cent of total affordable housing output (12,866 units) was delivered through inclusionary planning requirements in England AHURI Final Report No. 300 3 between 2015–2016, and inclusionary housing schemes apply to more than 500 cities across the United States. • Inclusionary planning for affordable housing remains limited in Australia. However, South Australia (SA) delivered 5,485 affordable rental and low cost home ownership dwellings between 2005–2015 through an inclusionary planning target applying to new residential areas, amounting to around 17 per cent of SA’s total housing supply.”⁷¹

15.4 How can planning and land use regulation facilitate or constrain the development of diverse and low-cost housing models?

Transforming Housing has identified that “using public land to provide social and affordable housing is one mechanism to address this critical deficit that can reduce social housing development costs by up to 30%. This report contends that government land can assist the state in achieving a target of 30,000 new social and affordable housing units over the next 10 years (2019-2029), with an emphasis on meeting the needs of those most at risk of homelessness.”⁷² The Report identifies 250 sites in Victoria, owned by Local, State and Federal Government and maps 195 hectares of publicly owned land and air rights that can host 30,000 social and affordable housing units.

A national agreement which includes all levels of government as signatories, could facilitate land usage and planning requirements freeing up government land for social housing development.

⁷⁰ Shearer, G., Homelessness in Footscray: Short-term Responses and Inclusionary Zoning as a Long-term Solution (prepared for Victorian Parliamentary Library on Behalf of Ms Katie Hall MP for Footscray, Melbourne, October 2019)

⁷¹ Gurran, N., et. al (2018) Inquiry into increasing affordable housing supply: Evidence-based principles and strategies for Australian policy and practice, ob. cit.

⁷² Palm, M., et al, ob. cit.