

Productivity Commission Housing and Homelessness Agreement Review

Victorian Government Submission – March 2022

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Overview

The Victorian Government welcomes the opportunity to make a submission to the Productivity Commission's review of the National Housing and Homelessness Agreement (NHHA).

The Victorian Government is committed to improving outcomes for Victorians in housing need and recognises the importance of the NHHA in supporting social housing and essential front line homelessness services. A strong and sustainable housing and homelessness sector is critical to ensuring Victorians have access to safe, secure and affordable housing.

The Commonwealth and state and territory governments have joint responsibility for housing and homelessness. This joint responsibility is reflected in the NHHA, which recognises the Commonwealth and the State's mutual interest in improving housing outcomes across the housing spectrum, including outcomes for Australians who are homeless or at risk of homelessness, and the need to work together to achieve those outcomes¹.

In 2021-22, the NHHA will provide \$411.8 million² of funding for the Victorian housing and homelessness system. This funding is critical to ensure that Victoria can provide services to people in greatest need.

Over the last decade, Victoria has seen unprecedented population growth and changing demographics creating significant housing affordability challenges across the State. These challenges are likely to persist despite population growth moderating. NHHA funding is not sufficient to grow social housing. It is also not keeping pace with growing housing and support needs in the community. More investment is needed to achieve improved outcomes.

While the Commonwealth Government has made no investments in growing social housing throughout the pandemic, the Victorian Government made a step change in investment in social and affordable housing through the \$5.3 billion Big Housing Build funded through the 2020-21 Victorian Budget. Our record investment in the Big Housing Build comes on top of other major investments including \$498 million for the refurbishment and maintenance of existing social housing dwellings, \$209 million to build 1,000 new public housing dwellings, \$150 million for the From Homelessness to a Home program, \$66 million Home for Families initiative and \$112 million for energy efficient upgrades to social housing. These significant reforms will set up the social housing system for future generations to come.

The next period of the NHHA offers a genuine opportunity to rethink the partnership across levels of government to improve housing outcomes. The Victorian Government stands ready to work in partnership with the Commonwealth Government.

In conducting the review, it will be important for the Productivity Commission to have regard to:

1. Roles and responsibilities: Different levels of government all play a role in addressing housing and homelessness. Opportunities should be pursued to work in partnership, with clear roles and responsibilities, to drive genuine reforms and improve outcomes for people – utilising the policy levers held by all levels of government and through complementary investment and effort.
2. Sustainable outcomes: NHHA objectives should be realistic, measurable, and commensurate to the funding received under the agreement. If the scope of the agreement requires action to address broader objectives (i.e. home ownership, affordable housing, planning and zoning reform), then commensurate funding should be provided.
3. Budget and policy autonomy: Greater utilisation of the Commonwealth's own-source revenue and better enable states to direct funds to respond to local needs and allocate funds where they are most needed. For Victoria this is funding across the social housing and homelessness portfolios.
4. Durable funding: Ensuring funding certainty is crucial, so that the NHHA, at a minimum, is maintained and directed to core and essential social housing and homelessness activities for those people in critical

¹ National Housing and Homelessness Agreement, Purpose, Paragraph 3

² Commonwealth, Final Budget Outcome, 2021-22,

housing need. It is also imperative to ensure indexation is adequate and the outdated method used to calculate homelessness funding is revised to a more contemporary methodology.

5. Accountability and transparency: This should be equally applied to both the Commonwealth and the states and territories. Both levels of government are accountable to the community for housing and homelessness outcomes, as opposed to being viewed through the lens of the states' acquittal to the Commonwealth.

Importance of social and affordable housing

Social and affordable housing is essential infrastructure that delivers significant long-term benefits

Housing is an important foundation for reducing disadvantage and improving the health, wellbeing, and social and economic outcomes of Victorians. Access to social and affordable housing gives individuals and families greater opportunities to engage with and maintain connections with services, focus on improving their health and wellbeing, and have the foundation on which to build connections with the community, education and employment.

Social and affordable housing is essential infrastructure that is critical to the functioning of Victorian communities and the Victorian economy.

The benefits of access to stable housing accrue to all levels of government

The benefits of social housing go beyond individual benefits – through social inclusion, economic participation, and flow-on benefits to economic productivity and the workforce. Provision of stable housing reduces pressure on other portfolios through avoided costs and savings, including health, justice and social services. The scale, complexity and cost of service delivery is higher when clients are experiencing, or at risk of, homelessness.

Stable housing also gives people the foundation to participate in education, training and the workforce, with downstream benefits flowing to Australia's tax and welfare system.

We also know that housing delivers immediate economic benefits through construction activity and jobs. Victoria's \$5.3 billion Big Housing Build – our biggest ever investment in social housing – is driving economic activity and jobs as our economy recovers from the coronavirus pandemic.

Infrastructure Australia's latest Infrastructure Plan³ promotes the concept of 'social infrastructure' as economic infrastructure.

“ This is the first time the Australian Infrastructure Plan has included social infrastructure such as schools, hospitals, parks, community centres and social housing. The sector's inclusion acknowledges the critical role these physical spaces and assets play in supporting the nation's wellbeing and making Australia a great place to live.

Investment in quality social housing should be a central part of a sustainable, inclusive economic recovery, including job creation. ” Infrastructure Australia, 2021

Housing is a collective responsibility across all levels of government

The NHHA sets out the shared responsibility that the Victorian and Commonwealth Governments have in improving housing outcomes across the housing spectrum, including outcomes for Victorians who are homeless or at risk of homelessness.

³ Infrastructure Australia, 2021 Australian Infrastructure Plan, <https://www.infrastructureaustralia.gov.au/publications/2021-australian-infrastructure-plan>

The Victorian Government has a crucial role to play in the provision and delivery of housing assistance. However, addressing housing and homelessness should not be viewed as the sole responsibility of states and territories. The Commonwealth Government has additional levers at its disposal and significantly greater fiscal resources – some 3 times the level of own-source revenue of the States and Territories combined, which impact on the housing market and can directly or indirectly influence home ownership and rental affordability. These include Centrelink income support, rental assistance and taxation settings. The NHHA does not compel the Commonwealth to exercise these levers or even ensure that Commonwealth policies are congruent with the goal of improving housing access and affordability.

The Victorian Government has taken a holistic approach and mobilised various levers in the support of growth of social and affordable housing and the delivery of housing assistance. However, a joint effort is required to address the barriers to accessing affordable and secure housing. Victoria is working with the private sector, institutional financiers, community housing sector, and not-for-profit sectors to continue to provide cost effective construction, financing, and innovative delivery of housing solutions. Our investment in growth is accompanied by an effective wrap-around tenancy and human support system, which enables people to thrive and succeed. We realise that each partner has different strengths and expertise, and it makes sense to combine these by working collaboratively together to deliver new housing, for the people that need it, and in the right locations, as effectively as possible.

During the 2008, Nation Building Economic Stimulus – Social Housing Initiative, both the Commonwealth and States worked in partnership to invest in social housing that delivers both social and economic outcomes. The Stimulus program exceed expectations and over 4,500 social housing dwellings were delivered in Victoria. The Victorian Government strongly encourages the Commonwealth to work together with us so we can achieve our common goal of helping to deliver more housing for people who need it.

Victorian context

The housing and homelessness landscape in Victoria

Over the last decade, Victoria has seen unprecedented population growth and changing demographics creating significant housing affordability challenges across the State. These challenges are likely to persist despite population growth moderating.

Victoria has experienced a significant appreciation in house prices over the last 15 years.

Home ownership rates are falling, especially among people under 45 and those on very low to moderate incomes. Growing numbers of Victorians are delaying purchasing a home, and as a result are renting for longer.

The private rental market is also becoming more competitive, resulting in a tighter and more expensive market. Victorians are finding it harder to secure an affordable place to rent, with only 10.7 per cent of rentals in metropolitan Melbourne and 33.3 per cent in regional Victoria, affordable for low-income households⁵ in September 2021. In Victoria, rental stress for those on Centrelink incomes and receiving Commonwealth Rent Assistance is far too high, with 46.7 per cent of these households paying more than 30 per cent of income on rent⁶. Around 18 per cent were paying more than 50 per cent of income on rent (an indicator of extreme rental stress).

The coronavirus pandemic has also impacted the housing market in Victoria, with regional markets experiencing rental price increases and vacancy rates decreasing (from 2 per cent in March 2020 to 1.2 per cent in June 2021)⁵. The median income in regional Victoria is nearly \$6,000 less per year than in metropolitan Melbourne and increases in housing costs have a higher proportional impact on regional household budgets.

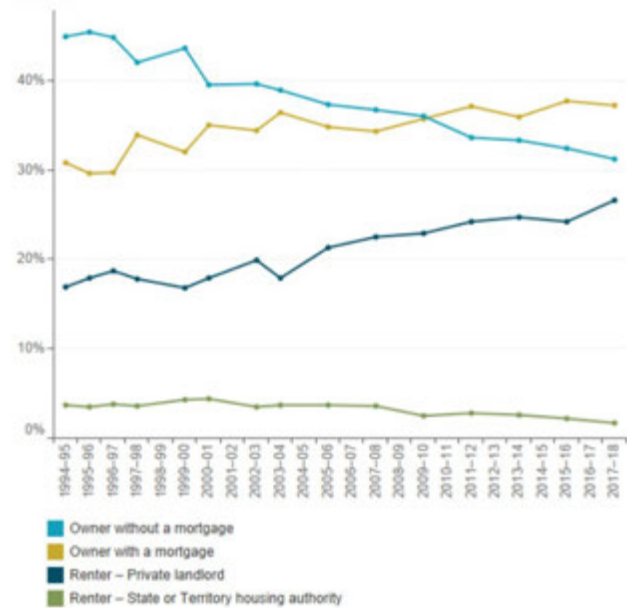
While Metropolitan apartment rents eased slightly (with median rents at \$430 per week in March 2020 to \$400 per week in September 2021), there are still affordability challenges for people on low incomes.

Housing instability has an even greater impact on low-income households, which face the most acute access and affordability challenges. These pressures are exacerbated by the lack of options in the private rental market and the scarce supply of social housing. Victoria has the lowest proportion of households living in social housing in Australia, with only three out of every 100 households living in social housing compared to the national average of 4.1 out of 100.

In Victoria there are around 85,900 social housing dwellings⁷. There is a large gap between demand and supply. Allocations into social housing have been slowing, and in 2020-21 there were 2,812 new allocations into social housing. This is relative to more than 50,000 applicants waiting for social housing, of which 28,000 households are in urgent and priority housing need.

Diagram 1: Homeownership is getting out of reach⁴

Households by tenure type (%), 1994–95 to 2017–18
Victoria



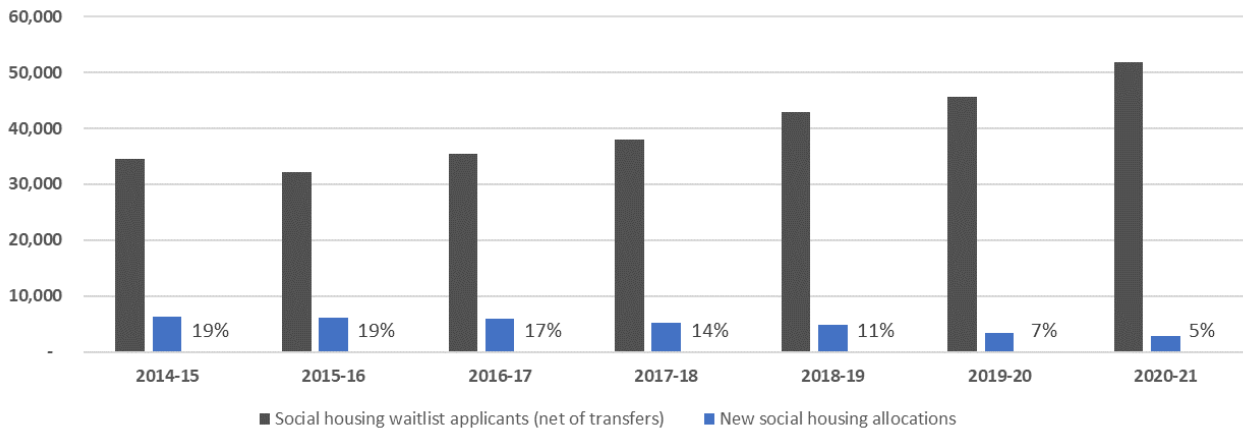
⁴ Australian Institute of Health and Welfare, Housing data dashboard, using ABS data. <https://www.housingdata.gov.au/>

⁵ Department of Families, Fairness and Housing, Rental report, September 2021

⁶ Productivity Commission, Report on Government Services 2022, Chapter G, Housing

⁷ Department of Families, Fairness and Housing, 2021 Annual Report, Additional service delivery data

Diagram 2: New social housing allocations are slowing, while the waitlist is growing.

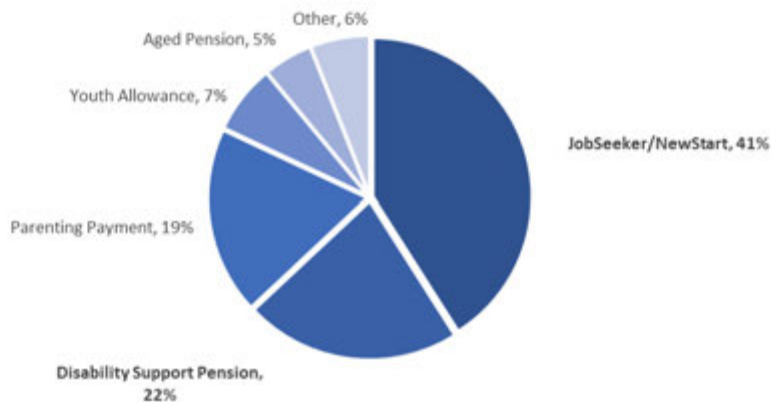


Given the significant unmet housing need, allocations into social housing are prioritised for those in most need. Over 92 per cent of public housing allocations and over 70 per cent of community housing allocations go to those in priority need⁸. Many of the people offered social housing are on the lowest incomes and face additional complexities including family violence, mental health issues, disability, and recurring or chronic homelessness.

There is growing demand for housing assistance across the housing spectrum. More than 105,000 people experiencing or at-risk of homelessness presented to homelessness services in Victoria in 2020-21⁹. Between the 2001 and 2016 Census, homelessness increased 36.7 per cent in Victoria, driven by a complex interplay of factors, such as increasing housing costs, lack of affordable housing, the inadequacy of Centrelink income support, and family violence. On any given night, more than 24,000 people in Victoria are experiencing homelessness, with many of those sleeping rough.

People receiving Commonwealth income support payments are over-represented in the homelessness system. The majority of people experiencing homelessness and in receipt of Commonwealth income support were dependant on JobSeeker/NewStart Allowance. Before recent temporary increases to Commonwealth income support due to COVID-19, Newstart Allowance was considered below standard benchmarks for income adequacy and poverty¹⁰.

Diagram 3: Income sources for people on Centrelink who are accessing homelessness services in 2020-21



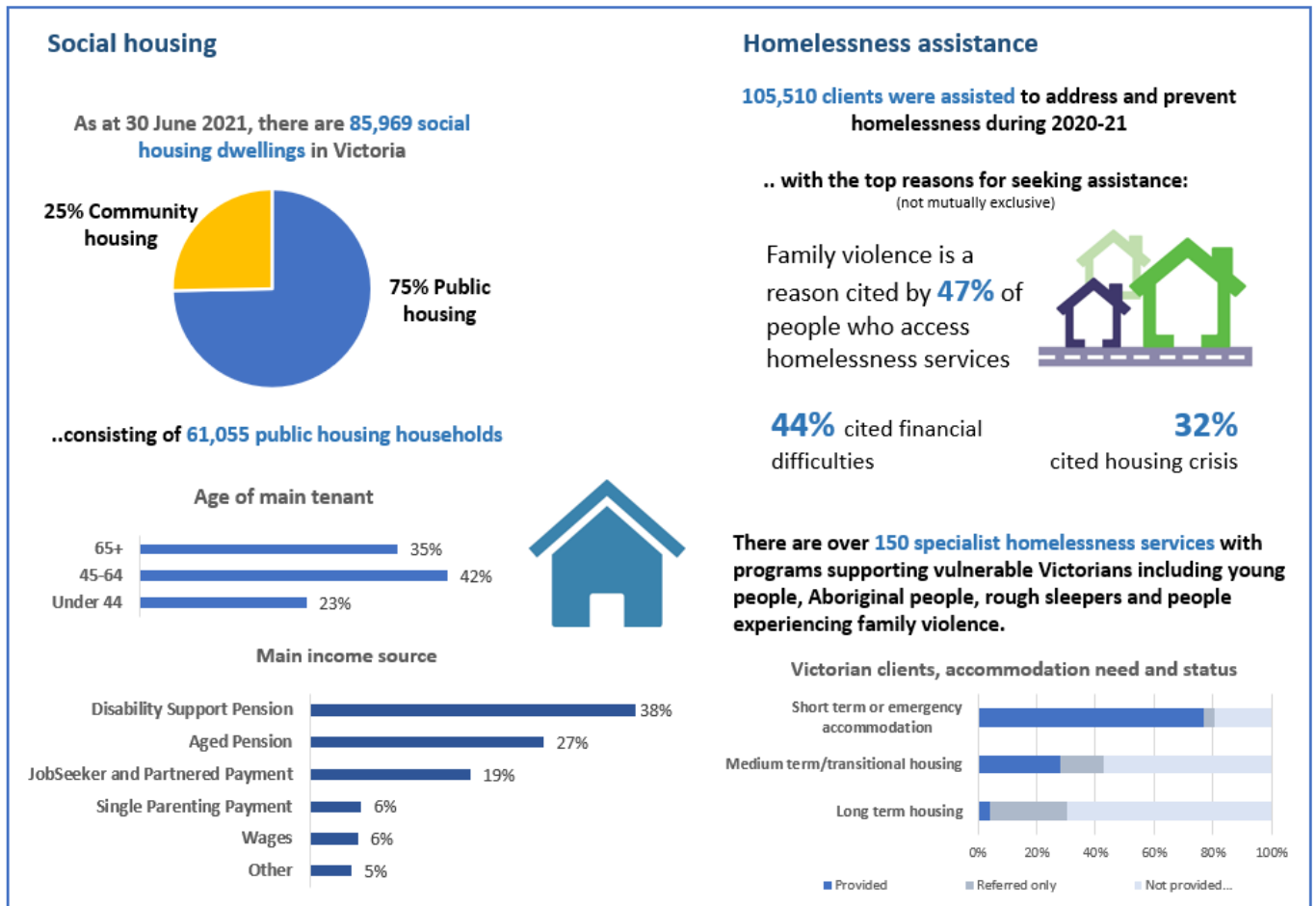
People experiencing housing stress and homelessness may be the victim survivors of family violence or family breakdown; they may be people experiencing mental illness, drug and alcohol abuse, or financial or social isolation. Many households, including those experiencing disadvantage for other reasons, face severe financial hardship or homelessness due to the lack of safe, secure, and affordable rental accommodation.

⁸ Victorian Government, Social housing allocations, <https://www.vic.gov.au/social-housing-allocation>

⁹ Productivity Commission, Report on Government Services, 2022, Chapter G, Homelessness

¹⁰ ACOSS and UNSW, Poverty in Australia 2020

Diagram 4: Demographics - social housing and homelessness assistance

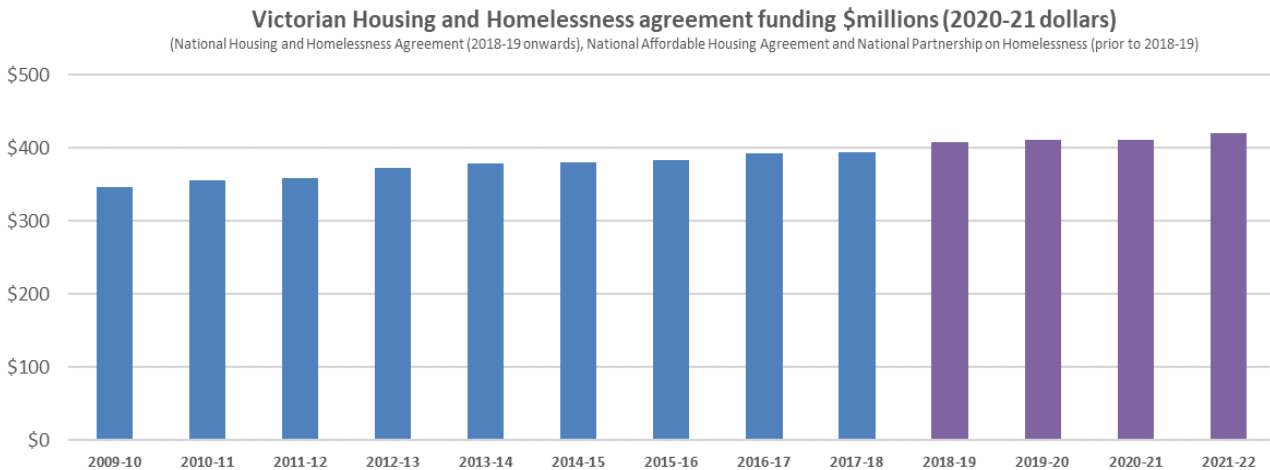


Contribution of the National Housing and Homelessness Agreement

In 2018-19, a new National Housing and Homelessness Agreement (NHHA) was introduced. It consolidated the previous National Affordable Housing Agreement and National Partnership Agreement on Homelessness and made homelessness funding ongoing.

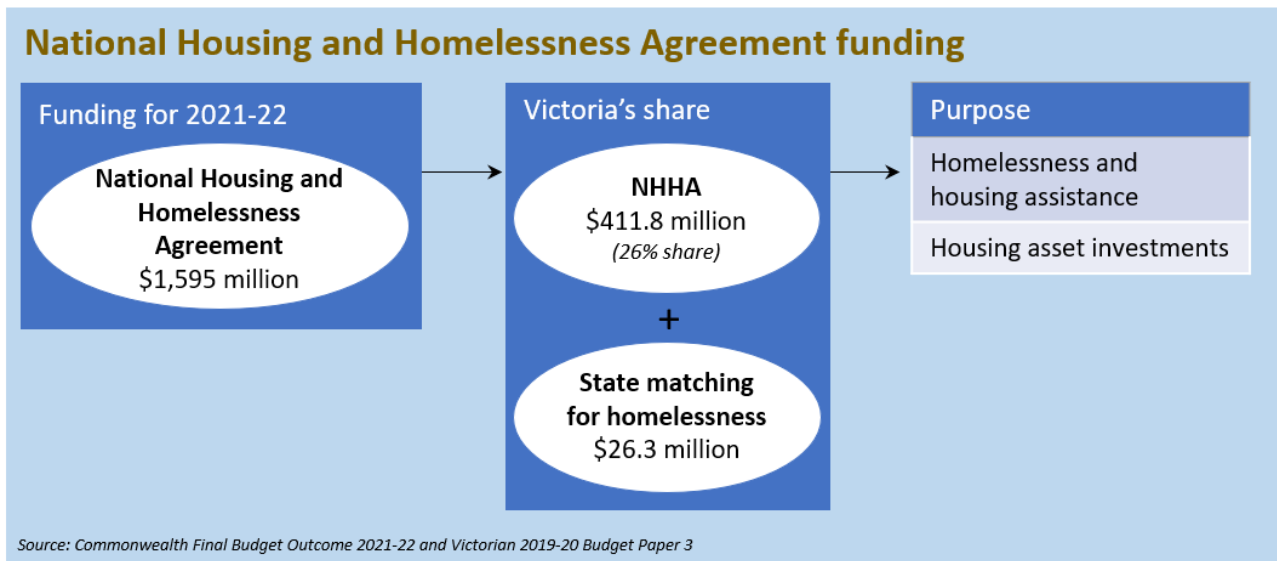
The NHHA consists of an on-going multilateral agreement, which outlines the objectives that the Commonwealth, States and Territories agree are important at a national level. Bilateral schedules are reviewed every five years and recognise the different housing and homelessness priorities in each jurisdiction. They set out how each state and territory proposes to implement reforms and initiatives to contribute to the objectives under the NHHA multilateral agreement.

Diagram 5: National Housing and Homelessness funding to Victoria



The ongoing National Housing and Homelessness Agreement provides the framework and basis for the Commonwealth’s contribution to state housing services. Previous national agreements had mandated broader aims to assist renters and purchasers, having evolved from being a post-war reconstruction program, to promoting home ownership, to the present day where it is largely targeted towards people on low incomes or at disadvantage. While it is important to acknowledge the legacy of these past agreements, it is also important to recognise that the current agreement now only funds social housing (predominantly investments on existing assets) and homelessness assistance in Victoria.

Diagram 6: Victoria’s NHHA funding and purpose for 2021-22



As outlined in Victoria's Statement of Assurance, the National Housing and Homelessness Agreement has been spent on:

\$million	2018-19	2019-20	2020-21
Housing	197.65	203.22	206.57
Homelessness and housing assistance	197.65	203.22	206.57

This has contributed towards the performance of:

	2018-19 (actual)	2019-20 (actual)	2020-21 (expected)
Total number of social housing dwellings ^B	85,626	85,111	85,969
Number of households assisted with long term social housing (aggregate total for public, Aboriginal and community long term tenancies at end of year)	77,464	77,900	77,900
Number of public housing dwellings upgraded during year	2,145	1,661	2,665
Total social housing dwellings acquired during the year	874	1,097	2,169
Percentage of social housing tenants satisfied with completed urgent maintenance works	86.9	89.7	87.5
Average waiting time for public rental housing for those clients who have received priority access housing allocation or a priority transfer (months)	11.6	12.0	12.5
Number of clients assisted to address and prevent homelessness	112,054	115,168	111,850
Number of clients provided with accommodation ^A	27,845	29,293	31,750
Proportion of clients where support to sustain housing tenure was provided or referred	84.6	86.6	89.8

Notes:

^A The 2019-20 outcome is higher than the 2019-20 target primarily due to unprecedented demand for emergency accommodation during the coronavirus (COVID-19) pandemic.

^B The 2020-21 target has been reduced to reflect the demolition and replacement of housing stock, where a temporary reduction occurs in 2020-21 ahead of additional housing being added in future years.

Victoria's record investments and reforms

The NHHA provides critical funding to Victoria for core service delivery in the social housing and homelessness system, amounting to \$2 billion over five years. The Victorian Government also matches the Commonwealth homelessness funding component of \$122.8 million over five years. In recognition of the scale of housing need, the Victorian Government has invested a record amount, above its requirements under the NHHA, to improve outcomes for individuals and families across the State.

The Victorian Government is investing in social and affordable housing for current and future generations.

Big Housing Build

The record \$5.3 billion investment in social and affordable housing will deliver 12,000 new homes across metropolitan and regional Victoria. Overall, the Big Housing Build will increase Victoria's social housing portfolio by 10 per cent.

Social Housing Building Works

\$498 million for the maintenance and upgrade of 23,000 social housing properties across Victoria and building 168 new social housing dwellings. This will fast-track economic recovery and create local jobs. The package aims to provide modern, comfortable and accessible accommodation.

Ground lease

In a first of its kind for Victoria, housing at Brighton, Flemington, Prahran, South Yarra, Hampton East and Port Melbourne will be delivered through an innovative Ground Lease Model, where the land and all dwellings will remain under the ownership of Homes Victoria. A mix of social, affordable, specialist disability and market rental homes will be delivered.

Social housing energy efficiency upgrades

\$112 million for energy efficient upgrades to 35,000 social housing to provide energy cost savings, improve comfort for tenants and deliver environmental benefits. Key upgrades include the installation of air conditioners in the states hottest area, replacing inefficient heating or hot water systems and installing insulation and draught proofing.

... and we are also protecting the health and safety of vulnerable Victorians during the COVID-19 pandemic and those experiencing homelessness.

From Homelessness to a Home

\$150 million package is providing housing and support packages for 1,845 people experiencing homelessness requiring emergency hotel accommodation due to COVID-19. Support packages were made available to assist families and individuals in hotels to move into safe and secure longer-term housing.

Homes for Families

\$66 million to support up to 250 families with children currently living in emergency accommodation to secure stable housing and have the support they need to keep it. This will continue to support families with children while longer term housing is sourced.

Since March 2020 the Victorian Government has implemented initiatives to help people experiencing homelessness keep safe while reducing the potential for community transmission of coronavirus, including:

- temporary rental eviction moratorium and moratorium on rent increases for six months, including for those in social housing.
- rent relief grants which consists of a one-off payment of up to \$3,000 for tenants who had lost income and were experiencing rental hardship
- support to place people sleeping rough into hotel accommodation during the COVID lockdowns.

Victorian housing and homelessness reforms

a. 10 Year Strategy for Social and Affordable Housing

Issues paper questions:

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?

The Victorian Government is developing a 10-Year Strategy for Social and Affordable Housing to complement the Big Housing Build and position our housing system for the long term.

The 10-Year Strategy builds on this record investment, bringing together reform and action to deliver a social and affordable housing system that is efficient, collaborative and sustainable for generations to come.

Feedback from the sector, community and Victorians with lived experience has helped shape this strategy, which places people at the centre. The 10-Year Strategy for Social and Affordable Housing is being finalised and will be released in early 2022.

A requirement of the National Housing and Homelessness Agreement is for states and territories to have a publicly available housing and homelessness strategy. The 10-Year Strategy for Social and Affordable Housing is intended to be the key document to acquit this requirement. The Strategy aligns with objectives of the NHHA and includes specific actions and reforms that will improve housing outcomes.

b. Residential Tenancies Act 1997 (Vic) reforms

Issues paper questions:

Are residential tenancy laws in each jurisdiction appropriate? How might residential tenancy laws better support renters, while not increasing the cost of renting? What has been the impact of tenancy reforms over the past five years in various States and Territories?

The *Residential Tenancies Act 1997* (RTA) is the main source of consumer protection for Victorians living in rental housing, setting out the rights and obligations for renters and rental providers (landlords). Since it was introduced, there have been many changes in the rental market with growing numbers of Australians in rental housing, and around one-third of private renters nationally considered to be 'long-term', having rented continuously for over ten years.

On 24 June 2015, the Victorian Government launched the Fairer, Safer Housing review, a comprehensive review of the RTA. The Review represented a once-in-a-generation opportunity to revisit the regulatory settings that have been in place since 1997, and to ensure they meet the needs of participants in today's rental housing market.

Following the review, the *Residential Tenancies Amendment Act 2018* (Vic) provided a package of over 130 reforms to the rental sector in Victoria which came into effect on 29 March 2021. These changes extend to all types of tenancies: private rentals, caravan parks, residential parks, and rooming houses.

The new rental laws have increased protections for renters, while ensuring those who provide rental housing can still effectively manage their properties. These changes include:

- Information disclosure: Before entering into a rental agreement, the rental provider must disclose to the renter whether the property is on the market for sale, or if they are not the owner of the property that they have the right to let the rented premises, and information about any embedded energy network.
- Minimum standards: Rental providers have a duty to ensure their rental property meets the rental minimum standards covering things like door locks, rubbish bins, mould, electrical safety, hot and cold water, heating, windows coverings and lighting.

- Modifications: Renters can make certain modifications without the rental provider's consent. There are other modifications which a rental provider cannot unreasonably refuse consent to renters making.
- Electrical and gas safety: Rental providers must complete gas and electrical safety checks.
- Terminations: Rental providers cannot issue a 120-day 'no specified reason' notice to vacate, they must provide a valid reason specified in the RTA.
- Evictions: Victorian Civil and Administrative Tribunal must not issue an eviction possession order without first considering whether it is reasonable and proportionate to do so.
- Bonds: Renters can now apply directly to the Residential Tenancies Bond Authority (RTBA) to get their bond back.
- Family violence: Family violence is taken into account in for modifications, staying in a property, leaving a property and distributing the bond.

c. Victorian Planning system

Victoria's land use planning system is guided by sound strategic principles to help ensure the planning system facilitates a sufficient supply of housing in the right locations.

High rates of population growth were a key challenge for land use planning in Victoria before the COVID pandemic. Plan Melbourne 2017-2050 (March 2017) and other policies were developed in part to meet the high demand for housing and to direct housing growth to the best locations.

While Victoria's population has fallen in the last year due to the interruption in overseas migration it is expected that population growth will return to previous levels in the next few years. Accordingly, the strategic principles that underpin Plan Melbourne remain sound. They will help ensure the availability of appropriately zoned land supply, opportunities for residential development in established areas and the timely provision of infrastructure to support population growth.

Regional Victoria has also seen a spike in the demand for housing. Victoria's Department of Environment, Land, Water and Planning (DELWP) has undertaken work to assess the supply and consumption of residential greenfield land in key locations.

A focus of Plan Melbourne is to direct housing growth in established areas to key precincts and activity centres. Fisherman's Bend and the Arden precinct are key examples. The focus of established areas has been bolstered by research by Infrastructure Victoria in 2019 which showed that it is generally more efficient to provide infrastructure supporting residential development in established areas. The focus of encouraging residential development in established areas is also central to the Plan Melbourne principle of 20-minute neighbourhoods. This aims to develop liveable places where people can access most of their daily needs locally without needing a car. These principles will be implemented at a regional level through the Land Use Framework Plans to encourage new housing in identified locations.

The Victorian planning system also seeks to facilitate the supply of affordable housing. Victoria introduced a voluntary framework for the provision of affordable housing in June 2018. The voluntary framework has been reviewed to understand how greater consistency and certainty may help to deliver more affordable housing supply through land use planning. Victoria has trialled the delivery of a mix of social, affordable and market housing on surplus government land through the Inclusionary Housing Pilot. Recent reforms have also been introduced to facilitate the planning consideration of dwellings being delivered through the Big Housing Build.

In terms of land use planning reform more broadly Victoria has embarked on a significant program of reform. This was in response to the Red Tape Commissioner's review of State and local government processes surrounding building and planning approvals. The reform initiatives include measures to improve planning rules and processes, strengthen capabilities, and provide for better reporting of the planning system outcomes. In relation to the reform of reporting of planning system outcomes Victoria looks forward to the next report from the Australian Bureau of

Statistics to the Housing and Homelessness Data Working Group on indicators of land use regulation and housing supply scheduled for June 2022.

d. The Social Housing Regulation Review

In November 2020, as part of the Big Housing Build, the Victorian Government commissioned the independent Social Housing Regulation Review. The purpose of the Review is to identify future regulatory arrangements that will best support the long-term interests of social housing residents and their communities. It also aims to best position social and affordable housing for growth and transformation over the coming decades. The Victorian Government remains a key stakeholder of the Review that is currently ongoing with a final report expected in May 2022.

Opportunities to improve the current NHHA

The effects of housing stress, instability, and homelessness are felt most acutely by low-income households, who remain the focus of services funded under the NHHA in Victoria. It is with this lens that we seek to respond to the issues paper. The recommendations for improvements to the current NHHA reflect the principles in the Federation Funding Agreements Framework¹¹, which govern Commonwealth-State funding agreements.



Roles and responsibilities Different levels of government all play a role in addressing housing and homelessness. Opportunities should be pursued to work in partnership, with clear roles and responsibilities, to drive genuine reforms and improve outcomes for people – utilising the policy levers held by all levels of government and through complementary investment and effort.

1. National housing strategy

Issues paper questions:

Is its purpose clear and appropriate? 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)?

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 NHHA currently operates like a funding contract and is not integrated with other Commonwealth policy settings that impact on housing outcomes. The Commonwealth plays an instrumental role in the shaping the housing market. This includes wider programs and policies that impact on housing, including taxation settings, infrastructure provision (city deals), Commonwealth Rent Assistance, National Rental Affordability Scheme, National Housing and Finance Investment Corporation bond aggregator, as well as portfolio linkages in mental health and disability. The development of a strategy that considers these elements would be of substantial benefit to creating a more cohesive system.

Victoria considers that state housing and homelessness strategies would have primacy and outline the specific actions states would take to achieve housing outcomes. However, a national housing policy is vital in articulating the joint goals across levels of government and to set out how Commonwealth levers are contributing to better outcomes across the housing system. The strategy should also reflect the objectives and funded responsibilities under the NHHA.

¹¹ Federal Financial Relations, The Federation Funding Agreements Framework, <https://federalfinancialrelations.gov.au/federation-funding-agreements-framework>

2. NHHA is a joint agreement

Issues paper questions:

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?

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?

Are the roles and responsibilities of the different levels of government appropriate for the next agreement or should they be changed?

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?

Addressing housing and homelessness is a shared responsibility of both levels of government that is also influenced by policies, programs and initiatives funded outside of the NHHA. This includes those the Commonwealth has responsibility for, including income support, taxation, migration and direct investment which all have an impact on housing supply, housing utilisation levels and the level of homelessness and social housing demand.

Collaboration and co-operation between all levels of government is needed to improve housing and homelessness outcomes for people. The relationship that is being forged with local government recognises the roles councils have in planning, community engagement, understanding local housing need, and the delivery of local services. The Victorian Government has committed to working with local government to develop a Social and Affordable Housing Compact, which would include an important role for local government in identifying priorities for social housing growth in their municipality.

The NHHA should be a genuine partnership between the Commonwealth and the states, and a shared recognition of the forces that are shaping demand for housing and homelessness services. Where possible, opportunities should be pursued to work in partnership with the Commonwealth to drive reforms and improve outcomes for people. Consideration should be given to tangible actions from the Commonwealth in the following areas:

- unlocking suitable Commonwealth land for social and affordable housing.
- provision of subsidies/incentives to improve housing outcomes for low- to moderate-income households, particularly as Commonwealth co-funding for the National Rental Affordability Scheme, under which there are 5,000 properties in Victoria, is due to expire by 2025. There is a gap in the market for incentives to grow supply and help to bring the National Housing Finance and Investment Corporation (NHFIC) bond aggregator to scale.
- commitment to review Commonwealth Rental Assistance (CRA) payments in high-cost rental markets, as:
 - CRA maximum payments in Metropolitan Melbourne are the same as the maximum rates in regional areas, leading to poorer affordability outcomes in certain high-cost markets.
 - CRA payments are indexed in line with CPI, but in practice, rents in the private rental market have tended to grow faster than CPI. The Productivity Commission research paper¹² found maximum rates of CRA have fallen well behind increases in rents over the past 15 years and increasing them would improve the wellbeing of many private renters who struggle to make ends meet.
 - recipients of certain income support payments (ie Youth Allowance) still face significant difficulty in meeting the basic cost of housing, even when they receive CRA.

¹² Productivity Commission Research Paper, 2019, Vulnerable Private Renters: Evidence and Options

The paradigm that States have responsibility for housing supply, while the Commonwealth is only involved in demand-side responses, is near-sighted and has not been helpful in addressing the fundamental need for more social and affordable housing in our communities.

Social housing needs a subsidy, and while the states have a crucial role in growing supply, it can't deliver meaningful change without investment from the Commonwealth. Structural change is needed to deliver an enduring funding mechanism to substantially grow social housing, which will work alongside the NHFIC bond aggregator. This will help drive a new generation of social and affordable homes. Collaboration is critical to deliver new housing, for the people that need it, and in the right locations, as effectively as possible.

The COVID pandemic has emphasised the value of a home - to isolate, to recover, to house our essential workers, and provide safety and security to the most vulnerable in the community. The Commonwealth is uniquely placed to set a national vision to reposition housing as essential social infrastructure and set an expectation of social housing as part of the urban fabric of our communities.

3. Potential avoided costs and benefits attributable to the Commonwealth

Investments into social and affordable housing and homelessness services create benefits and avoided costs for the Commonwealth. Avoided costs can provide benefits or ongoing savings to the Commonwealth due to reduced service usage. Economic benefits also arise through employment and productivity gains and education outcomes for recipients, leading to social and community benefits with increased community participation and enhanced security and safety.

Case studies that demonstrate economic benefits and cost savings attributable to the Commonwealth include:

- NHFIC found residential construction has a large economic multiplier with every \$1 million of residential construction supporting nine jobs across the economy¹³. Residential construction is a vital industry in the Australian economy in terms of its contribution to jobs and economic growth.
- KPMG found that \$1 in construction activity produced \$1.30 for the economy during the Nation Building Social Housing Initiative¹⁴.
- A UNSW report notes¹⁵ that:
 - access from housing to locations where households work, study, shop and relax has major significance for household costs and opportunities. Stability provided by housing enables participation in employment and education.
 - housing location and affordability have a direct effect on labour mobility and connection to the labour market.'
- The 'Home at Last' program¹⁶ evaluation found a benefit of \$21,203 per person with housing support services can assist to reduce premature entry into residential aged care for a portion of its eligible clients. These clients are otherwise entering residential aged care, not due to critical health or assistance needs, but due to a lack of available housing options. The same can be said of public housing residents looking to age in place, therefore delaying entry into high-cost residential care.

In line with Infrastructure Australia's recognition of social infrastructure in its latest Infrastructure Plan, further work could be progressed at a national level to build a standardised framework for assessing the costs and benefits of housing provision, including attribution of avoided costs and benefits to different levels of government, community and individuals. This framework is needed to properly embed social housing as infrastructure and build confidence for social and affordable housing as an asset class.

¹³ National Housing Finance and Investment Corporation, 2020, Building Jobs: How Residential Construction Drives the Economy

¹⁴ KPMG Social Housing Initiative Review, 2012, http://www.nwhn.net.au/admin/file/content101/c6/social_housing_initiative_review.pdf

¹⁵ UNSW, 2018, Making better economic cases for housing policies

¹⁶ Housing for the Aged Action Group Inc, 2021, Home At Last economic appraisal

4. Governance structure between Commonwealth and States on housing

Issues paper questions:

Are the governance structures under the Agreement adequate and effective?

Following the Conran Review, the Council on Federal Financial Relations was allocated responsibility for housing. In line with the outcomes of the Conran Review, Housing Ministers can meet for one off meetings, or a series of meetings to discuss a particular issue as it arises. To date, no meetings have been held.

A Housing Ministers forum to address specific issues would be valuable. The establishment of a time limited (12 month) Ministerial forum, similar to that for Community Services Ministers, is recommended by Victoria.


Social and affordable housing and homelessness are matters of national significance requiring long term commitment and leadership to drive structural reform and improve housing affordability. A national governance forum will enable linkages to be made across national priorities, such as the *Closing the Gap* strategy, which is playing a key role in addressing the housing outcomes for Aboriginal Australians. A ministerial forum will be instrumental to promote intergovernmental coordination and cooperation and deliver a national plan and measures to increase social and affordable housing supply and reduce homelessness.

The Victorian Government has invested over \$6 billion into social and affordable housing in Victoria, and on-going Commonwealth contribution is required to maintain the growth pipeline beyond 2024. A national forum will help to build partnerships and crystalise future growth opportunities.

Priority issues for discussion may include:

- the significant challenge of housing affordability facing all Australian governments, including consideration of the full scope of jurisdictions' responsibilities, with a focus on actions for the Commonwealth using federal policy levers as well as policy responses for states and territories,
- optimising assistance for renters in housing stress, including implications from the expiry of the National Rental Affordability Scheme,
- overseeing the development of a national housing policy (should the Commonwealth and states and territories wish to develop one)

Victoria considers that the agenda and terms of reference for a Ministerial forum should be agreed by all jurisdictions.



Sustainable outcomes. NHHA objectives should be realistic, measurable, and commensurate to the funding received under the agreement. If the scope of the agreement requires action to address broader objectives (i.e. home ownership, affordable housing, planning and zoning reform), then commensurate funding should be provided.

5. NHHA scope giving rise to unfunded commitments

Issues paper questions:

Is the objective of the NHHA appropriate? Is the scope of the NHHA —'across the housing spectrum' — appropriate?

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

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

a. Funding is insufficient to meet ‘aspirational’ objectives of the NHHA

Funding under the NHHA has reduced in real terms over the last 10 years.

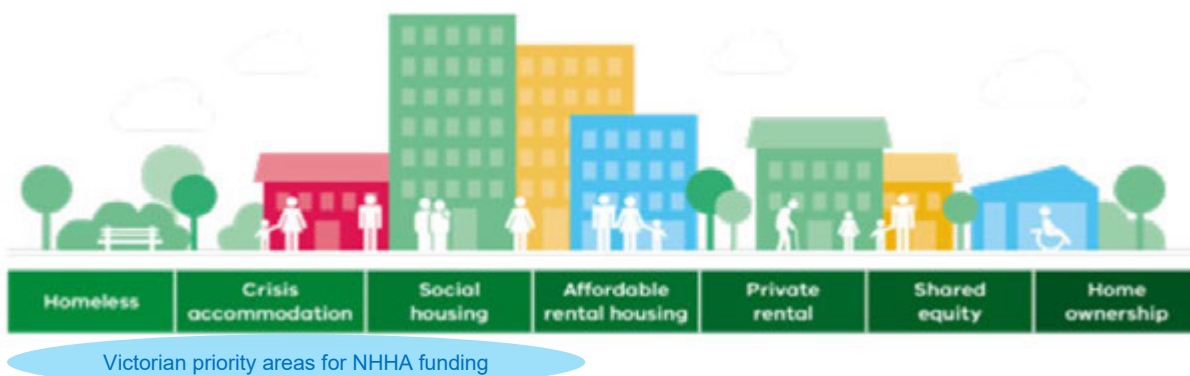
As a result, NHHA funding in Victoria is predominantly used for maintaining the current housing assets and providing homelessness assistance. Delivering core services is an essential function to the sustainability of the Victorian housing system.

If the scope of the agreement is expanded to cover the whole housing spectrum and funding tied to broader objectives (home ownership, affordable housing, planning and zoning reform), this should be supported by additional investment. These reforms are important in the broader housing context and Victoria is willing to do more should additional funding arise. However, funding for these reforms are not substitutes for, nor should they be replacing, the assistance we provide to disadvantaged Victorians.

For example, the Victorian Government provides First Home Buyers Grants, stamp duty concessions, and a shared equity program (Victorian Homebuyer Fund), which are not funded using the NHHA. We understand that other jurisdictions may be using a portion of their NHHA funding for activities that support home ownership, but at present this is not in scope for Victoria’s bilateral agreement. Additional responsibilities required of states in this area will require commensurate funding.

We also recognise the risk that without additional funding, spreading the same funding envelope across additional responsibilities will dilute service provision for disadvantaged Victorians. In addition, greater conditionality on funding is not going to see these broader objectives achieved. At a minimum, the priority should be to ensure funding is maintained for core social housing and homelessness services.

Diagram 7: Housing continuum



b. NHHA funding is insufficient to grow social housing supply, and additional growth needs further investment

NHHA funding is used to sustain Victoria’s public housing system of 65,000 dwellings and ensures that our public housing portfolio remains fit for purpose, is in well-serviced areas and continues to meet the needs of our clients. With NHHA funding currently dedicated to maintaining our housing portfolio, growth can only be achieved through additional investment.

The National Housing Finance and Investment Corporation bond aggregator has provided a vital contribution to long-term lower cost financing. When finance is used in combination with land or other capital subsidies, it has the potential to accelerate the potential growth outcomes for social housing. While there is broad support for the bond aggregator, it is insufficient on its own to improve the supply of social and affordable housing and it needs to be

coupled with capital co-investment¹⁷. The NHHA can be a platform for Commonwealth capital investment to accelerate the growth of social housing.



Budget and policy autonomy. Greater utilisation of the Commonwealth’s own-source revenue to better enable states to direct funds to local needs where they are most needed. For Victoria this is funding across the social housing and homelessness portfolios.

6. Autonomy over funding

Issues paper questions:

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?

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

States and territories are best placed to determine local responses to local needs via their housing and homelessness strategies

Policy and financial autonomy of states and territories to spend NHHA funds flexibly needs to be maintained.

State and territory governments work directly with service providers to identify those in need of housing and homelessness supports, understand their individual needs, provide appropriate, evidence-based services to assist them and provide ongoing support to prevent a future loss of housing. States and territories understand the complexity of client needs and the unique challenges encountered by different cohorts in their local communities and are therefore best placed to plan for future housing and homelessness service delivery that will meet the needs of their communities. These plans are encapsulated in state and territory housing and homelessness strategies.

Even within Victoria, needs and challenges differ from a geographic perspective (metropolitan to regional housing markets and pressures can vary), requiring different responses (from light touch to capital intensive), catering to different cohorts (as there are a range of needs). These challenges are best addressed when considering the local context. The ability of states and territories to identify local needs, prioritise, and provide appropriate responses is a strength of the NHHA.

The bilateral agreement provides the states and territories with an opportunity to tailor outcomes to emerging priorities and circumstances. A key priority is ensuring any changes to the NHHA do not impinge on Victoria’s ability to determine our own priorities or adapt funding flexibly to meet local needs. Discretion over the use of funding is critical so we can adapt services to new priorities and emerging issues.

Any future NHHA should continue to provide funding for both housing and homelessness in a single agreement. These issues are intertwined and splitting funding between separate agreements has the potential to create perverse incentives or re-direct funding away from where it could have the most impact.

¹⁷ Council on Federal Financial Relations Affordable Housing Working Group, September 2017, Supporting the implementation of an affordable housing bond aggregator.



Durable funding: Ensuring funding certainty is crucial, so that the NHHA, at a minimum, is maintained and directed to core and essential social housing and homelessness activities for those people in critical housing need. It is also imperative to ensure indexation is adequate and the outdated method used to calculate homelessness funding is revised to a more contemporary methodology.

7. Revise outdated methodology used to calculate homelessness funding

Funding for homelessness services under the NHHA is distributed among states and territories according to share of homelessness population as estimated by the Australian Bureau of Statistics in the 2006 Census of Population and Housing. This data is now 16 years out of date, and there is currently no mechanism in the agreement to review the methodology for distributing homelessness funds, or for the methodology to be updated with the most up to date data once it becomes available.

A more contemporary methodology is required to ensure homelessness funding is distributed according to current demand, and better reflects levels of service delivery. A change to ensure that the most up to date population data is used to distribute homelessness funding would be consistent with many other national payments.

The Commonwealth should use the most recent data and a method of indexation that better reflects the costs of delivering housing and homelessness services. Victoria supports a change to using latest Census data. There may also be value in exploring alternative methodologies for distributing homelessness funding, particularly those that consider the drivers of homelessness.

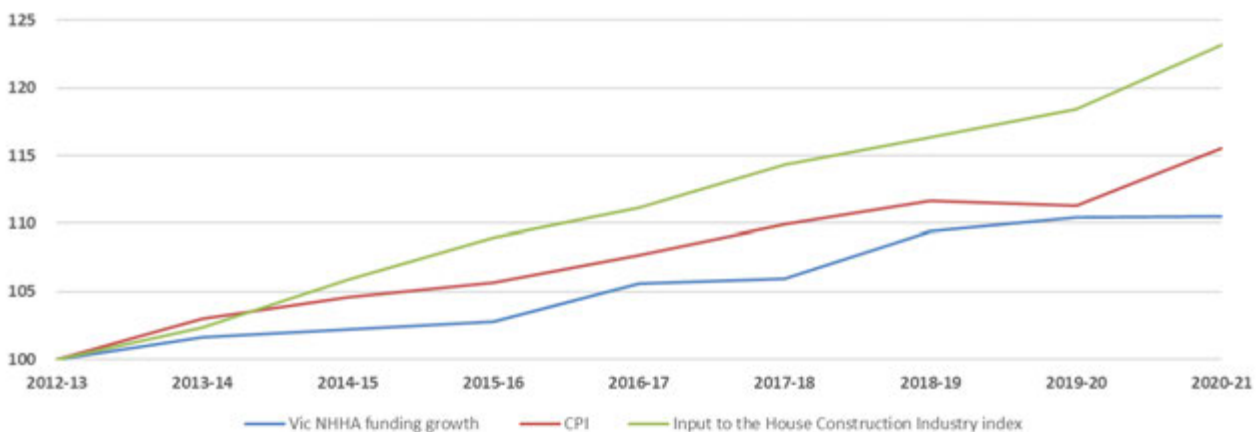
Once the methodology is revised, it should also be reviewed periodically on an ongoing basis. Fluctuations in funding resulting in changes to population-share is common across many national payments, and this is intentional to account for the relative service delivery demands across jurisdictions.

8. Adequacy of NHHA indexation

Indexation of the NHHA (and before it, the National Affordable Housing Agreement) has not kept pace with the increasing cost of delivery, including capital works, tenancy and property management for an increasingly complex client portfolio.

NHHA funding is distributed according to population share and indexed according to Wage Cost Index 1 (WCI), which has been trailing at less than 2 per cent per annum, and generally a lower rate than the Consumer Price Index. This does not reflect the real rising cost of providing services or delivering housing. Housing costs that have escalated above the wage cost index include expenditure on council rates, maintenance and upgrades on an ageing public housing portfolio, and additional compliance obligations associated such as gas heaters and fire-safety.

Diagram 8: Growth rate of Victorian NHHA funding compared with various indices



If the National housing agreement had been indexed to CPI since 2012-13, Victoria would receive an estimated \$430 million, compared to the \$411.8 million in 2021-22 under the current indexation approach. Alternatively, if it was indexed to the House Construction Industry Index, this would be \$450 million. This additional investment could have been used to address even more housing need of between 39 to 81 dwellings¹⁸ or increase the provision of homelessness services.

9. Ongoing commitment to the Social and Community Services Equal Remuneration Order

The Social and Community Services Equal Remuneration Order (SACS ERO) funding, of which the Commonwealth contribution is built into the NHHA, supports Victorian organisations providing critical family violence, housing and homelessness services. This has enabled workers in the sector to be paid on a par with those in other, similar industries. Supporting organisations to meet the SACS ERO award rate is a joint responsibility of both state and territory and Commonwealth governments. This was acknowledged in the previous National Partnership Agreement on Pay Equity for the SACS sector, which ended with recognition that the Commonwealth's ongoing obligations would be fulfilled within specific intergovernmental agreements.

The Victorian Government delivers on its responsibility by providing SACS ERO supplementation funding to organisations that are within scope of the Fair Work Australia decision, including to organisations funded via the NHHA. This is included in the funding base for these organisations and will continue to be provided into the future.

The Commonwealth Government has made a commitment to provide states and territories with SACS ERO funding for two years up to 30 June 2023, worth \$44.4 million to Victoria, as allocated in the 2021-22 Commonwealth Budget.

Victoria considers it essential that the Commonwealth makes an ongoing commitment to funding its share of the SACS ERO under the NHHA, to provide greater funding certainty to the sector and ensure that the Commonwealth upholds its commitment to shared responsibility for the SACS ERO. This should occur by rolling this contribution into the base funding for the future agreement.



Accountability and transparency. This should be equally applied to both the Commonwealth and the states and territories. Both levels of government are accountable to the community for housing and homelessness outcomes, as opposed to being viewed through the lens of the states' acquittal to the Commonwealth.

10. Data and performance framework

Issues paper questions:

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?

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

Are there better ways to measure progress towards achieving the objective and outcomes of the NHHA?

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

¹⁸ Dwelling yield is based on the average construction cost from the Big Housing Build indexed to CPI.

Victoria meets the requirements for funding under the NHHA, which is conditional on:

- having a Bilateral agreement with the Commonwealth, reviewed every 5 years
- having an up-to-date housing strategy and homelessness strategy
- matching Commonwealth funding for homelessness services each year. In 2020-21, Victoria committed \$25.5 million to match the Commonwealth's contribution for homelessness services under the NHHA.
- meeting reporting requirements, ie Annual Statement of Assurance.

An annual Statement of Assurance¹⁹ is produced by Victoria as part of reporting required under the NHHA. Any proposed changes or additional reporting requirements need to occur in consultation with states and territories, and not be imposed unilaterally by the Commonwealth.

Reporting under the NHHA should increase the transparency and understanding to the broader community of how funding is being used to improve housing outcomes. The Commonwealth should also produce an annual Statement of Assurance, in recognition that the NHHA is a joint agreement with shared responsibility for housing and homelessness.

The Victorian Government is supportive of improved transparency of housing and homelessness data to the public. It has contributed to the development of the Data Improvement Plan, which is a requirement of the NHHA. The plan outlines activities that progress the development of the national performance indicators. Victoria continues to prioritise data improvement activities that relate to social housing and homelessness assistance, which are Victoria's funded activities under the NHHA.

The Victorian Government also contributes towards the National Housing Research Program led by the Australian Housing and Urban Research Institute (AHURI), which is building the research and evidence base across housing, homelessness, and urban policy.

We also acknowledge that in late 2019, the National Housing Finance and Investment Corporation has established a Housing Research function to analyse housing demand, supply and affordability in Australia. This is a positive step since the National Housing Supply Council was abolished.

Victoria also advocates for opportunities to strengthen and develop a nationally consistent housing data collection. This could include linkage of housing and homelessness data with other service systems, to build our research and evidence base and guide future reform. Victoria has contributed to the National Disability Data Asset²⁰ project, and a similar project could be undertaken for housing and homelessness.

¹⁹ Annual Statement of Assurance, <https://federalfinancialrelations.gov.au/agreements/national-housing-and-homelessness-agreement-0>

²⁰ National Disability Data Asset project, <https://ndda.gov.au/>

Broader opportunities for improvement

Aboriginal housing

The Victorian Government is committed to Aboriginal self-determination and supported the development of a Victorian Aboriginal housing and homelessness strategy. In February 2020, *Mana-na woorn-tyeen maar-takoort: Every Aboriginal Person Has a Home*, the Victorian Aboriginal Housing and Homelessness Framework (VAHMF) was released²¹. The framework represents the first housing policy at a state-wide level prepared by the Aboriginal community for the benefit of Aboriginal peoples in Victoria. The VAHMF will help to ensure continued progression towards achieving Objective 3.2 of the Victorian Aboriginal Affairs Framework 2018-2023 by increasing income and housing security for Aboriginal households.

This work also complements Victoria's work under the National Agreement on Closing the Gap. Housing is one of four priority areas for sector strengthening under the National Agreement, and work is progressing to achieve Outcome 9: Aboriginal and Torres Strait Islander people secure appropriate, affordable housing that is aligned with their priorities and need.

The VAHMF seeks to create the building blocks for a strong, sustainable, and well-resourced Aboriginal housing sector in Victoria. The framework is underpinned by Aboriginal self-determination that is fundamental to strengthen the Aboriginal housing sector by delivering a culturally safe and responsive housing system that addresses the challenges that Aboriginal Victorians face during this housing crisis. It provides avenues to advance Aboriginal community led housing delivery, management and ownership, and allow for greater participation from Aboriginal led organisations in future sector growth opportunities.

The framework is designed to address systemic barriers which prevent a large proportion of Victoria's Aboriginal community from accessing safe, affordable and quality housing in Victoria. The framework has five goals focussing on self-determination; social housing; homelessness; the broader housing continuum including private rental and home ownership; and developing a capable housing sector.

Aboriginal Victorians experience housing stress and homelessness at levels that are significantly disproportionate to the wider community. The VAHMF found that 17 per cent of Aboriginal people in Victoria sought assistance from a homeless service and almost half (44 per cent) of these people were already homeless. Of those Aboriginal people seeking support over three quarters are re-entering the system, demonstrating the need for early intervention services to establish and maintain tenancies.

Evidence shows, better outcomes are achieved when Aboriginal people can self-determine how they set priorities within their community and sectors in developing policy, delivering services, and implementing, monitoring, and evaluating programs.

A stronger Victorian Aboriginal Housing sector is aligned with the Victorian Government's nation leading approach in Aboriginal affairs including the VAHMF, the Victorian Aboriginal Affairs Framework, Victorian Treaty and the Victorian Yoo-rook Justice Commission. These combined actions demonstrate the changing nature of the relationship between the Victorian Government, Traditional Owners and the Aboriginal community, towards partnership and self-determination. Strengthening the Aboriginal Housing sector through this investment ensures that the community is able to drive Aboriginal-led outcomes-focused solutions to accelerate the achievement of socio-economic targets in the National Agreement and in these frameworks.

The VAHMF has recommended the adoption of "Aboriginal targets (funding and outcomes) in the Victorian Agreement with the Commonwealth under the National Affordable Housing Agreement (NAHA)". This is in light of the National Partnership Agreement on Remote Indigenous Housing concluding on 30 June 2018 and ensuring that housing need and interests of Aboriginal Victorians are reflected in a national housing and homelessness agreement, that are underpinned by self-determination and builds upon the Closing the Gap sector strengthening process.

²¹ Victorian Aboriginal Housing and Homelessness Framework, <https://www.vahmf.org.au>

Victoria's approach to the design and delivery of the Big Housing Build Aboriginal dwelling target (10 per cent net of all new social housing for Aboriginal Victorians) is an exemplar of delivering more housing for Aboriginal people in an approach that delivers several outcomes including:

- Aboriginal housing sector strengthening and capacity building.
- Increase ownership of social housing within Aboriginal communities.
- Bespoke delivery models, offering agency to the Aboriginal housing sector and Aboriginal community.
- Increasing the number of Aboriginal registered housing providers.
- Offering a culturally safe service system for renters.

Homelessness

The Victorian Government's Homelessness and Rough Sleeping Action Plan (Action Plan) was released in 2018. The Action Plan focuses on four main themes: intervening early to prevent homelessness; providing stable accommodation as quickly as possible; supporting people to maintain their accommodation; and an effective and responsive homelessness system. The directions in the 10-Year Strategy for Social and Affordable Housing will build on these themes and inform actions to improve housing outcomes.

Future reform will also build on the many strengths and achievements of the homelessness service system, including the \$150 million From Homelessness to a Home (H2H) and \$66 million Home for Families initiative. The H2H initiative is providing up to 1,845 households experiencing homelessness who have been placed in emergency accommodation due to the coronavirus pandemic, with access to stable housing exits and multi-disciplinary support packages. It is expected that the H2H initiative will make a significant and lasting difference for people with histories of chronic homelessness and rough sleeping. Following internationally recognised Housing First principles, the aim is to house people as quickly as possible to prevent further harm from homelessness or rough sleeping. Securing a safe place to live means recovery can start, and individual health and wellbeing needs can be met more effectively through tailored support packages, as well as support to sustain people's housing.

In the context of the broader reform of the specialist homelessness service system, the Victorian Government will ensure a coordinated, sustainable and informed sector is enabled to work flexibly with each individual to resolve and prevent future homelessness. We will look at ways to achieve this by:

- sharing data with service providers to better understand trends and work towards outcomes
- streamlining the entry and assessment process to better enable people to receive tailored responses that meet their needs
- ensuring the homelessness sector continues to build on integration and collaboration opportunities with the wider social services sector, voluntary groups and the community
- supporting the development of a workforce transition strategy to ensure staff and agencies are empowered with knowledge and support
- building upon our evidence base of best practice and welcoming consumers to add to our knowledge.

While the Victorian Government has made record investments to support people experiencing or at risk of homelessness, a recent report from the Victorian Parliamentary Inquiry into Homelessness²² recognised the need for action from the Commonwealth Government. The Inquiry recommends permanent increases to the rate of Commonwealth JobSeeker payments and consideration of the indexation of this payment to CPI, as well as addressing the many barriers to accessing income support.

²² Legal and Social Issues Committee, Inquiry into homelessness in Victoria, <https://www.parliament.vic.gov.au/lisic-lc/inquiries/inquiry/976>