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Attention:

Housing and Homelessness Agreement
Productivity Commission
GPO Box 1428
Canberra City ACT 2601, Australia

About GCYS

Operating on the Gold Coast since 1980, Gold Coast Youth Service is a not for profit, specialist youth support & homelessness organisation. We help all young people and their families in the Gold Coast Region who may be marginalised, disadvantaged or homeless.

For a full description of our service please visit our website: www.gcys.org.au

Please find below the Gold Coast Youth Service submission to the National Housing and Homelessness Agreement Review: Issues Paper.

Yours sincerely

Maria Leebeek

CEO

Acknowledgement of Traditional Owners Acknowledgement of Aboriginal and Torres Strait Islander peoples

GCYS Inc. acknowledges Aboriginal and Torres Strait Islander peoples as the traditional and ongoing custodians of the lands on which we live and work. We pay respects to Elders past and present. We acknowledge that sovereignty has never been ceded and recognise First Nations peoples' rights to self-determination and continuing connections to land, waters, community and culture.

Response to 2: Assessing the performance and suitability of the Agreement

The purpose of the NHHA

Questions

What is the purpose of the NHHA? 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?

Response

Housing and homelessness is a national issue. The Gold Coast Youth Service (GCYS) supports the continuing role of both the Commonwealth and the States in responding to housing and homelessness issues in Australia. As noted in the issues paper the IGA establishes frameworks for “shared objectives, coordination of national policy reforms, improved transparency and accountability, clarified roles and responsibilities, and funding arrangements”.

The GCYS supports the NAHA as a funding agreement that underpins a National Housing and Homelessness Strategy. The funding for the Specialist Homelessness Service (SHS) system has provided a foundational platform from which there has been the development of services that respond to people experiencing homelessness. This consistent foundation has enabled ongoing quality improvement in the service system – creating a continuum of care framework. This service system has also enabled a national response, rather than piecemeal State and Territory responses and assisted in the national Census enumeration of homelessness count.

A National Housing and Homelessness Strategy will provide the basis for the coordination of efforts between the Federal and State governments. An agreed strategy will an improved understanding of the need for housing to end homelessness. However it will also highlight that the Federal government has a range of policies and programs that impact on young people ability to access and sustain housing. There is a need for all levels of government to be working together, rather than at cross-purposes, to maximise the investment into housing and homelessness responses.

The GCYS also support the work of the Australian Alliance to End Homeless and refer the commission to their report “Ending Homelessness in Australia: and evidence and policy deep dive”

https://aaeh.org.au/assets/docs/homelessness_deep_dive_full_report.pdf

Is the objective appropriate and has it been achieved?

Questions

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?

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?

Response

The GCYS supports the Everybody Home campaign the outlines a range of objectives and these should be reviewed and incorporated into the national agreement objectives.

Outcomes of the Agreement



Questions

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?

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

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?

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

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?

Are the outcomes of the NHHA suitable for the next agreement, and why (or why not)? To what extent should the outcomes of the next agreement be aspirational rather than achievable within the life of the agreement?

Response

The NHHA has six outcomes and whilst these may be seen as aspirational they provide a clear goal to work towards.

There are some challenges to the community being able to effectively comment on the outcomes when there is little opportunity to review the outcomes. Historically the Commonwealth government did have a Commonwealth Advisory Committee on Homelessness under the Supported Accommodation Assistance Act established under the Minister. It would be great to revisit these type of arrangements where there is a broader stakeholder group including non-profit representation for overseeing the outcomes to ensure that there is greater transparency and accountability to these Federal-State Agreements.

The broad comments that the GCYS will make is that there needs to be more:

- investment in the social housing system
- greater scope for Community Housing providers to lever off their stock to invest in other housing solutions
- continuation of funding to Specialist Homelessness Services and to assist in new ways of working such as the Gold Coast Zero Campaign

There has been a greater understanding for the funding of supportive housing models. The GCYS would support additional resourcing for the development of a Common Ground on the Gold Coast and additional Youth Foyers across Queensland.

The GCYS would continue to advocate for young people being a priority cohort. In terms of children and young people however we would also support a greater focus on people experiencing mental ill health. In the national AIHW data for people experiencing homelessness in the month of December it was found that out of the 13,331 clients in Queensland about 3234 had a current mental health issue – this equates to approximately 24%. This was about the same for the youth service. However when the GCYS asked young people if they had previously been diagnosed with a mental health condition 56.4% indicated that they had been. There were a small number (just over 3%) that were in receipt of an NDIS support package.

- Most of these young people were between the ages of 17-25 years of age.
- Most were couchsurfing or had some form of housing with about 25% sleeping rough, in tents, cars or other forms of insecure housing
- Most were unemployed (nearly 80%) and were on some form of welfare support. With some having no income at all on presentation
- A small number were undertaking an education or training option
- Just over 20% identified as ATSI
- They presented to the service due to issues of poverty and in dire need of housing.

It has always been known that multiple factors affect mental health including biological, environmental and social. The high rate of young people presenting with a diagnosed mental health, and this does not include those who have not received any health treatment, is reflective of the environmental impact that an experience of homelessness and family breakdown can have.

Unfortunately as the data from young people leaving care shows the experience of homelessness is often not short term.

Whether mental health or homelessness comes first what we can see is that unmanaged mental health and homelessness impacts on young people's schooling, work and social interactions.

The high rate of substance use disorders can be a form of self-medication to deal with being homelessness or the fear of not having somewhere to live.

The chances of being homeless as a young person also places you at risk of homelessness as an adult. If we put a gender lens on we can look at the rate of older women being one of the highest currently out of all people. If we then look at young women who are homeless, have a mental health diagnosis, the chances are they will have a greater chance on not completed schooling, not have a high income, if she has children will have lower superannuation and likely be subject to the vagaries of the rental market. The social cost of not supporting young people who are experiencing homelessness and who have an unmanaged mental health condition is high.

The economic cost lie in the use of the public health system, increased reliance on income support, subsidized housing and welfare.

Outputs of the agreement



Questions

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?

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?

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

Response

The outputs are still relevant however as it's a joint agreement it would be good to include outputs required by the Federal government as well.

Whilst it is good to see the State and Territory Housing and Homelessness Strategies as noted before there is also the need for the National Housing and Homelessness Strategy.

The AIHW has continued to work on improvements in data collection with regard to SHS, they have improved the interface with the ABS Census. Together have been providing accurate homelessness estimates that have enabled local services as well as social planners to reflect on the service delivery to young people.

The roles and responsibilities of governments under the Agreement



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? For example, should local governments (who are not parties to the NHHA) be parties to the next agreement?

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?

Response

There is scope to review the roles and responsibilities of each party in the agreement – Commonwealth, State and Local Government. Specifically that there is a more active role for the Commonwealth and that social housing and homelessness is not just the responsibility of the State. Another key issue is that there is not a role for the non-profit sector or at least a process for consultation to ensure transparency and accountability.

GCYS refers the Commission to the National Shelter submission and recommendations.

Performance monitoring and reporting



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? What should the performance framework be for the next agreement?

Response

GCYS refers the Commission to the National Shelter submission and recommendations.

GCYS would support the recognition of the work of the ABS in Homeless Enumeration Strategy. This point in time data provides important trending data in terms of how the various strategies are impacting on the numbers of people in Australia who are experiencing homelessness.

Response to 3: Issues across the housing spectrum

Homelessness



Questions

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

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

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?

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

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

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?

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

Response

The Gold Coast Youth Service as a specialist homeless services provides range of responses to young people who are at risk of or experiencing homelessness. Whilst we can provide excellent outcomes for the young people that are supported through the service the major barrier is the access to housing. The current

social housing system has an incredibly long wait list, the private rental market is unaffordable, and the community housing sector is also limited in their supply.

The current funding arrangement simply do not meet the demand.

As noted earlier the GCYS is supportive of the AAEH plan to end homelessness and we have signed to the Gold Coast Zero campaign.

The GCYS would also support the funding of more Youth Foyers across Queensland.

GCYS refers the Commission to the National Shelter submission and recommendations.

Social housing



Questions

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?

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?

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?

What changes are required to improve the financial sustainability of the social housing system? What are the benefits and costs of transferring ownership or management of social housing to community housing providers?

Has the NHHA contributed to a well-functioning social housing system? Has it improved transparency on, and accountability for, social housing spending?

What are the barriers to private and not-for-profit investment in new social and affordable housing? How has the National Housing Finance and Investment Corporation (NHFIC) supported new social and affordable housing developments? What is the experience of community and affordable housing providers seeking finance from NHFIC and other financial institutions?

How effective are the regulatory arrangements for community housing? What challenges do community housing providers face obtaining finance and expertise?

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

Response

There is not enough social housing. Often for many young people social housing is the only affordable housing option available to them especially due to the unaffordability in the private rental market.

The GCYS believes that the social housing needs to have range and mix of tenancies to create healthy communities.

GCYS refers the Commission to the National Shelter submission and recommendations.

Affordable housing and assistance for low-income renters

Questions

What are tenants' experiences with the different types of housing assistance? Do tenants prefer to receive assistance tied to one particular house or portable assistance (like Commonwealth Rent Assistance) that they can use in the private rental market?

Are there more affordable housing options available for people on low-to-moderate incomes as a result of the NHHA? Does the Agreement (and the bilateral agreements complementing it) adequately address affordable rental schemes?

What are the effects of housing assistance measures on the broader rental market and incentives for property owners?

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?

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

Response

GCYS refers the Commission to the National Shelter submission and recommendations.

The private rental market

Questions

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?

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?

What are the barriers to corporate and institutional investment in the residential property sector? Would an increased presence in the market lead to improved conditions for tenants? What would be the best way to encourage that investment?

How has COVID-19 affected the private rental market? Are the effects expected to be long-lived?

Response

Currently the rents are simply too high for many young people especially those on income support. In addition with many young people priced out of home ownership creating additional pressure on the private rental market.

The NHHA needs to demonstrate of how other government policies are impacting on access to housing such as the low levels of income support and Commonwealth rent assistance.

GCYS refers the Commission to the National Shelter submission and recommendations.

GCYS would also refer the Commission to the Making Renting Fair Queensland campaign that outlines a range of tenancy law reforms.

Housing outcomes for Aboriginal and Torres Strait Islander people



Questions

What is important to Aboriginal and Torres Strait Islander people and communities in the context of housing? How do housing needs differ between urban, regional and remote areas?

What barriers do Aboriginal and Torres Strait Islander people face securing affordable, safe, stable and culturally appropriate housing (including barriers to home ownership and securing private rentals and social housing)?

What progress have governments made improving housing and homelessness outcomes for Aboriginal and Torres Strait Islander people and communities?

How are Aboriginal and Torres Strait Islander people, communities and community-controlled housing organisations involved in the development, design and delivery of housing programs? How could this involvement be strengthened?

Does the NHHA (and the actions required under it) clearly specify the objectives and housing outcomes for Aboriginal and Torres Strait Islander people and communities? What (if any) principles, outcomes, targets and best practices could be embedded in the next agreement?

Are Aboriginal and Torres Strait Islander housing programs and initiatives (such as the Indigenous Home Ownership Program, National Partnership for Remote Housing Northern Territory, State and Territory Aboriginal and Torres Strait Islander housing and homelessness strategies, frameworks and action plans) effective? What improvements could be made?

Are there any obstacles for Aboriginal and Torres Strait Islander people accessing mainstream housing programs and homelessness services? What improvements (if any) could be made to mainstream programs to improve outcomes for Aboriginal and Torres Strait Islander people?

Are the roles and responsibilities of the Australian, and State and Territory Governments in improving housing and homelessness outcomes for Aboriginal and Torres Strait Islander people clear and appropriate?

How does the NHHA intersect with the National Agreement on Closing the Gap? How should the next NHHA align with the National Agreement on Closing the Gap?

Response:

The GCYS recommends that the governments needs to develop key policies and services in partnership with Aboriginal and Torres Strait Islander organisations and relevant housing providers.

Response to 4: The supply side of the housing market



Questions

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

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?

Response:

The Gold Coast Youth Service believes that the evidence that the housing supply is not there is through:

- Increasing numbers of people experiencing homelessness
- The private rental market rent increases demonstrating the market is highly competitive
- The low vacancy rates in all markets across Queensland
- The ever increasing price of housing

Planning and land use regulation



Questions

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?

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?

Are the national performance indicators in the NHHA — the number of dwellings permitted by zoning and the time taken to decide development applications — the best indicators to measure the impact of planning and zoning reforms?

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

Response:

The GCYS support the need for Mandatory Inclusionary Zoning (MIZ) as outlined by The Constellation Project. This is policy where a certain percentage of social and affordable housing must be included within all new housing projects. This would significantly improve supply and on the Gold Coast where there is significant number of new developments could make a significant difference.

As they note in their report *“This can be expressed in terms of land, dwellings or payment of an equivalent levy allocated to such housing. The social or affordable homes built as a result of MIZ are owned and managed by not-for-profit community housing providers (CHPS). In this way, community development and social support services are at the heart of this policy.”*