



Productivity Commission Review of the National Housing and Homelessness Agreement

March 2022



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Jesuit Social Services: Who we are and what we do

has been working for 45 years delivering support services and advocating for improved policies, legislation and resources to achieve strong, cohesive and vibrant communities where every individual can play their role and flourish.

We are a social change organisation working with some of the most marginalised individuals, families and communities, often experiencing multiple and complex challenges. Jesuit Social Services works where the need is greatest and where we have the capacity, experience and skills to make the most difference. Our services span Victoria, New South Wales and the Northern Territory.

Our service delivery and advocacy focuses on the following areas:

- **Justice and crime prevention** – accompanying people involved in, or at risk of becoming involved in, the justice system.
- **Mental health and wellbeing** – engaging people with multiple and complex needs including, mental health conditions, substance misuse issues, trauma, homelessness and bereavement.
- **Settlement and community building** – supporting recently arrived immigrants and refugees, and disadvantaged communities.
- **Education, training and employment** – helping people who have had limited access to learning, training and job opportunities.
- **Gender justice** – providing leadership on the reduction of violence and other harmful behaviours prevalent among boys and men, and building new approaches to improve their wellbeing and keep families and communities safe.
- **Ecological justice** – advocating and conducting research around the systemic change needed to achieve a ‘just transition’ towards a sustainable future, and supporting community members to lead more sustainable lives.

Research, advocacy and policy are coordinated across all program and major interest areas of Jesuit Social Services. Our advocacy is grounded in the knowledge, expertise and experiences of program staff and participants, as well as academic research and evidence. We seek to influence policies, practices, legislation and budget investment to positively influence people’s lives and improve approaches to address long-term social challenges. We do this by working collaboratively with governments, businesses, the community sector, and communities themselves to build coalitions and alliances around key issues, and building strong relationships with key decision-makers and the community.

Our Learning and Practice Development Unit builds the capacity of our services through staff development, training and evaluation, as well as articulating and disseminating information on best practice approaches to working with participants and communities across our programs.

We acknowledge the Traditional Custodians of all the lands on which Jesuit Social Services operates and pay respect to their Elders past and present. We express our gratitude for First Nations people’s love and care of people, community, land and all life.

Introduction

Jesuit Social Services welcomes the opportunity to contribute to the Productivity Commission's Review of the National Housing and Homelessness Agreement (the NHHA). We believe this review is critical noting the way in which the COVID-19 pandemic has compounded the vulnerabilities and difficulties faced by people at risk of, or experiencing, housing stress and homelessness.¹

Every person living in Australia should have access to the opportunities in life that will enable them to flourish – to access safe, secure and affordable housing, to complete their education, to get a job, to raise their children in safe communities, and to see the next generation thrive. Jesuit Social Services recognises that a whole-of-government approach, where service systems work together to target locations of entrenched disadvantage, is the most effective way of achieving this.

This submission draws on our experience working with many people – especially those with mental health and substance misuse issues, newly-arrived refugees and migrants, those exiting prison, and those leaving out-of-home care placements – who are experiencing or have experienced homelessness, inappropriate or unsafe housing, housing instability and stress, and other forms of disadvantage in their lives. We address key issues raised in the consultation paper and additional areas we believe warrant further attention.

In essence, Jesuit Social Services highlights that while the NHHA has played a critical role in setting the overall policy direction in relation to housing and homelessness, the Federal Government must do more to improve the national response to housing stress and homelessness. This includes by:

- Developing a 10-year national strategy on housing and homelessness;
- Increasing funding to meet the needs of people experiencing homelessness and housing stress;
- Supporting people with mental ill-health, substance use issues, and complex needs; and
- Ensuring housing is ecologically sustainable.

The extent to which the NHHA is meeting its objective

Jesuit Social Services emphasises that adequate housing is a fundamental human right.² Relatedly, it is widely acknowledged that secure long-term housing helps set a firm foundation for personal wellbeing and agency:

Access to safe, adequate and affordable housing is a crucial foundation for enabling a person's physical and mental health and wellbeing. Without access to appropriate housing, people are unable to focus on other aspects of their lives (such as health, education and employment) and are unable to contribute productively to society.³

On this basis, we commend the NHHA's positive objective to contribute to improving access to affordable, safe and sustainable housing across the housing spectrum, including to prevent and address

¹ Parliament of Australia Inquiry into Homelessness in Australia Final Report. (2021). ([Weblink](#))

² Office of the High Commissioner, United Nations. (no date). *International Covenant on Economic, Social and Cultural Rights* (article 11). Retrieved February 25, 2022, from ([Weblink](#))

³ Infrastructure Australia (2019). An assessment of Australia's Future Infrastructure Needs: The Australian Infrastructure Audit 2019. ([Weblink](#))

homelessness, and to support social and economic participation. However, evidence shows that more work is needed to ensure the NHHa meets this objective. This is clear when considering:

- Persistent housing stress, and
- Ongoing experiences of homelessness among national priority cohorts.

Persistent housing stress

Access to affordable housing continues to be a key issue for all Australians, particularly for those on low-incomes and in disadvantaged areas. Last year, Jesuit Social Services' latest [Dropping Off the Edge report](#) was released – the fifth edition of research spanning over 20 years, which maps disadvantage by location. The report identifies where entrenched and persistent disadvantage is located and demonstrates the complex web of challenges faced by those communities. Housing stress has been included as an indicator of disadvantage in the last three iterations of the Dropping off the Edge Report. The reports uses the 30/40 housing stress rule; defining a household as in housing stress if housing costs are over 30 per cent of its gross income, and the total household income is in the bottom 40 per cent of households of the equivalent size.⁴ Based on indicators including housing stress, Dropping off the Edge 2021 shows that disadvantage is concentrated in a small and disproportionate number of communities in each state and territory.⁵

COVID-19 has only exacerbated Australia's existing housing affordability crisis. In 2020-21, housing stress (also defined using the 30/40 rule) affected over one in four people (29 per cent) who attended specialist homelessness services.⁶ It is estimated that approximately one million low-income households currently experience housing stress.⁷ Measures to contain the spread of COVID-19, while necessary, have caused many households to experience income losses, resulting in increased housing stress. Further, the ongoing housing price boom has driven up the price of rent to beyond affordable for many people.⁸

Recent Australian research has emphasised the impact of housing stress on a person's wellbeing, showing that unaffordable housing was associated with feeling unsafe, community dissatisfaction, and poorer self-rated health.⁹ We highlight the urgent need to ensure sustainable housing solutions for all those who need them.

Ongoing experiences of homelessness among national priority cohorts

Jesuit Social Services acknowledges the six national priority cohorts identified in the NHHa, which are women and children affected by family and domestic violence; children and young people; Indigenous Australians; people experiencing repeat homelessness; people exiting institutions and care; and older people. We note that under the NHHa, state and territory homelessness strategies are required to address these cohorts.

⁴ Tanton, R., Dare, L., Miranti, R., Vidyattama, Y., Yule, A. and McCabe, M. (2021), Dropping Off the Edge 2021: Persistent and multilayered disadvantage in Australia, Jesuit Social Services: Melbourne.

⁵ Ibid.

⁶ Australian Institute of Health and Welfare (AIHW). (2021). Specialist homelessness services annual report 2020–21. [\(Weblink\)](#)

⁷ Ibid.

⁸ Pawson, H. (2021). COVID-19 effects on housing and homelessness: the story to mid-2021, *Australia's welfare 2021 data insights: Australia's welfare series no. 15*, Chapter 5. Cat. no. AUS 236. AIHW: Canberra. [\(Weblink\)](#)

⁹ Badland, H., Foster, S., Bentley, R., Higgs, C., Roberts, R., Pettit, C., & Giles-Corti, B. (2017). Examining associations between area-level spatial measures of housing with selected health and wellbeing behaviours and outcomes in an urban context. *Health & place*, 43, 17-24. [\(Weblink\)](#)

As highlighted by the *Inquiry into Homelessness in Australia Final Report*, for the cohorts prioritised under the NHHA, homelessness is a persistent and, in some instances, worsening issue.¹⁰ Jesuit Social Services notes in particular that while ‘people exiting institutions and care into homelessness’ are a priority cohort, more than half (54 per cent) of people exiting prison continue to expect to experience homelessness upon their release.¹¹

For many years, Jesuit Social Services has provided supported housing for justice system-involved young people through our **Perry House** and **Dillon House/Next Steps** programs. Perry House provides a residential-based living skills program for justice system-involved young people with an intellectual disability at risk of, or are experiencing, homelessness and require support. Dillon House/Next Steps, which was recognised by the 2017 Victorian Homelessness Achievement Awards, is a supported housing program for 16 to 24 year-olds involved with the justice system who are experiencing, or are at risk of, homelessness. With the increased provision of safe and stable housing as a foundation, we can tackle the issues contributing to a person’s offending behaviour, develop independent living skills that put people on a more positive pathway, and monitor their progress – daily where necessary – to deliver sustainable and lasting change.

We also deliver our **ReConnect** program across Melbourne’s north and western regions, as part of the Corrections Victoria Reintegration Pathway. ReConnect mainly supports people who have committed sexual or seriously violent offences to transition from prison to the community by providing tailored, flexible support across critical domains. Through case management, we link people with housing and material supports, and ensure people have pathways to economic and social participation.

More recently, we have partnered with the Victorian Government to launch the **Maribyrnong Community Residential Facility** for men exiting prison. Several residents at Maribyrnong have demonstrated that with the right supports in place they are able to settle into community life, look for work and plan a better future. Feedback from participants during the first 12 months of the program’s operation has been positive. One participant has provided feedback that the support of staff at the facility has been crucial in helping him to turn his life around:

They have not only provided me the environment to recover, but also enabled me to accelerate my ability and hope to return to a normal life and a career.

Having stable and affordable housing makes a significant difference in the life of a person leaving prison and can determine whether they reoffend. People exiting prison without housing often cycle from prison into homelessness and back into prison, with people exiting prison into homelessness nearly twice as likely to reoffend within nine months of release.¹² Post-release support, including transitional facilities and supportive public housing, is critical to ensuring that individuals do not exit prison into homelessness or unsuitable housing.

¹⁰ Parliament of Australia. (2021). *Inquiry into Homelessness in Australia Final Report*. ([Weblink](#))

¹¹ AIHW. (2019). *The health of Australia’s prisoners 2018*. Cat. no. PHE 246. Canberra: AIHW. ([Weblink](#))

¹² AIHW. (2019). *Specialist Homelessness Services annual report 2018-19*. ([Weblink](#))

A 10-year national strategy on housing and homelessness

Jesuit Social Services recognises that a whole-of-government approach, where policies, programs and support services are designed and implemented holistically, is the most effective way of ensuring every person living in Australia has access safe and affordable housing. The NHHA has played a critical role in setting the overall policy direction in relation to housing and homelessness. However, the Federal Government must do more to improve the coordination of the national response to housing stress and homelessness.

Jesuit Social Services was pleased to see the *Inquiry into Homelessness in Australia Final Report* include a recommendation for a national strategy to improve the coordination of the national response to housing and homelessness.¹³ A 10-year national strategy would establish a common focus for all Australian governments towards preventing and ending homelessness. We believe this must encompass the NHHA and other relevant policies that influence housing stress and homelessness, such as income support and rental subsidies. Further, the Federal Government should develop the strategy in consultation with people with lived experience, the community and private sectors, and all levels of government.

We also emphasise the need for the Federal Government to develop a national Aboriginal and Torres Strait Islander housing strategy in consultation with Aboriginal Community Controlled Housing Organisations. The impacts of colonisation, racism and dispossession continue to be felt by Aboriginal and Torres Strait Islander people and communities in Australia today.¹⁴ As a consequence, Aboriginal and Torres Strait Islander people are more likely to experience insecure housing, live in overcrowded houses and experience homelessness, including intergenerational homelessness, than non-Indigenous Australians.¹⁵ For example, in 2020–21, Aboriginal and Torres Strait Islander people made up over a quarter (28 per cent) of people assisted by specialist homelessness services.¹⁶ This is despite Aboriginal and Torres Strait Islander people making up around 3.1 per cent of the Australian population.¹⁷

A national Aboriginal and Torres Strait Islander housing strategy is urgently needed to address these acute housing challenges. We highlight the [Victorian Aboriginal Housing and Homelessness Framework](#) as a positive example that could be drawn on.

Jesuit Social Services recommends that the Federal Government:

- Establish a 10-year national strategy on housing and homelessness to complement the NHHA and improve the coordination of the national response to homelessness.
- Develop a 10-year national Aboriginal and Torres Strait Islander housing strategy in partnership with Aboriginal Community Controlled Housing Organisations to address the acute housing challenges experienced by Aboriginal and Torres Strait Islander people.

¹³ Parliament of Australia. (2021). *Inquiry into Homelessness in Australia Final Report*. ([Weblink](#))

¹⁴ Note: Hereafter we use the term 'Aboriginal' to describe the many Aboriginal and Torres Strait Islander people, clans and Traditional Owner groups of this land.

¹⁵ AIHW. (2019). *Specialist Homelessness Services annual report 2018-19*. ([Weblink](#))

¹⁶ AIHW. (2021). *Specialist Homelessness Services annual report 2020-21*. ([Weblink](#))

¹⁷ ABS. (2019). *Australian demographic statistics, Jun 2019*. ABS Cat. No. 3101.0. Canberra: ABS

Funding that reflects need

Jesuit Social Services wishes to express our concern in relation to the NHHA's current method of allocating funding, which is based on estimates of homelessness in the 2006 census. Given this data is now 16 years out of date, this does not reflect current need and demand for services, and is only enough to maintain the baseline of social housing and homelessness services. We therefore strongly support the *Inquiry into Homelessness in Australia Final Report* recommendation that the Federal Government develop a needs-based funding methodology to inform future funding arrangements.

Relatedly, we emphasise the need for the Government to commit more funding under the NHHA. As noted in the NHHA, the Federal Government, and state and territory governments have a shared interest in strengthening outcomes across the housing spectrum and need to collaborate to support people experiencing, or at risk of experiencing, homelessness. On this basis, the NHHA must increase long-term funding for specialist homelessness services to meet the growing number of people experiencing homelessness. This must include supplemental funding to assist organisations to meet the costs of complying with the Equal Remuneration Order (ERO) because of the 2012 Fair Work Commission decision to increase community sector wages to provide a skilled, experienced and qualified workforce.

Make a reasonable funding commitment to social housing

It is also critical that the Federal Government make a reasonable funding commitment to social housing. Following from this, we support Everybody's Home – the campaign for a better, fairer housing system – in their call for the Federal Government to invest in building 25,000 social housing properties each year.¹⁸ In addition to reducing homelessness and direct support costs, this measure would generate an economic output of \$12.7 billion and create 15,700 jobs.¹⁹

Jesuit Social Services highlights that while the total number of social housing dwellings has grown over the last decade, there has been a significant shift from public housing to community housing, and the overall number of dwellings has not kept pace with population growth and demand.²⁰ We emphasise that public housing is a vital component of Australia's social housing system, and it is unrealistic and unviable to rely too heavily on the private and community housing markets to rapidly expand and adequately provide for the diverse range of needs of those who require affordable housing. It is therefore critical that the NHHA ensures that good quality public housing is the central pillar of Australia's social housing supply mix.

Increase targeted, specialised and holistic packages of housing and support

We advocate for significantly increased investment in specific initiatives targeted to people with complex, multiple and intensive *long-term* support needs – such as through expansion of the specialist housing and intensive support packages accessed by the young participants in our Dillon House/Next Steps and Perry House programs.

Jesuit Social Services would like to see increased funding and availability of specialised housing and support packages targeted to people whose multiple and complex needs are generally not met through the private rental market and community housing organisations. This includes people with experiences of trauma, people exiting prison and people with mental ill-health and/or substance misuse issues.

¹⁸ See: <http://everybodyshome.com.au/>

¹⁹ SGS Economics. (2020). Economic Impacts of Social Housing Construction, Melbourne. ([Weblink](#))

²⁰ AHURI. (2020). Submission to the Inquiry into Homelessness in Australia. ([Weblink](#))

Everyone needs a safe and appropriate place to live, and adequately supported transitional housing is especially important for people exiting the justice system because it can facilitate their access to employment, as well as to suitable longer-term accommodation. It is not appropriate for people exiting prison to be accommodated in rooming houses, which are generally neither safe nor supportive.

Jesuit Social Services recommends that the Federal Government:

- Develop a needs-based funding methodology to inform future funding arrangements under the NHHA.
- Increase funding under the NHHA for homelessness services, including by funding Equal Remuneration Order (ERO) supplementation to meet increased wages costs arising from the 2012 Fair Work Commission ERO.
- Partner with state and territory governments as part of the NHHA to invest in 25,000 new social housing properties each year, with a particular focus on increasing the stock of public housing.
- Increase targeted, specialised and holistic packages of housing and support for people whose multiple and complex needs are not met through the private rental market or community housing systems.

Supporting people with mental ill-health and substance misuse issues

People with mental ill-health or substance misuse issues are currently not included as a national priority cohort under the NHHA. This is despite the number of people with a mental health condition requiring support from homelessness services increasing to 32 per cent in 2020-21 compared with 27 per cent in 2016–17.²¹ Over half (55 per cent) of these people were experiencing additional vulnerabilities, including issues with alcohol and other drug use.

Across Jesuit Social Services' justice and crime prevention, and housing and complex needs programs, of the participants categorised as experiencing homelessness as at 30 June 2021:

- 92 per cent had known histories of substance use (drugs or alcohol) and
- 84 per cent were experiencing mental health symptoms – 74 per cent had a mental health diagnosis and 10 per cent were exhibiting mental health symptoms.

A coalescence of structural factors has meant that housing is often inaccessible for people experiencing mental ill-health, substance misuse issues and other complex needs. Despite the clear link between mental health and housing, the systems are often siloed, with service gaps leading to poor outcomes for individuals navigating them.²² This is clear when considering the way in which people with multiple and complex needs cycle in and out of homelessness and the social housing system.²³

²¹ Australian Institute of Health and Welfare (AIHW). (2021). Specialist homelessness services annual report 2020–21. [\(Weblink\)](#)

²² Jesuit Social Services. (2019). Submission to the Royal Commission into Victoria's Mental Health System. [\(Weblink\)](#)

²³ Seelig, T., O'Flaherty, M., Haynes, M. & Han, J. (2008). Housing Consumption Patterns and Earnings Behaviour of Income Support Recipients Over Time. Melbourne: Australian Housing & Urban Research Institute, Final Report no. 118 as cited in Taylor, S. & Johnson, G. (2021) Sustaining social housing: Profiles and patterns. Melbourne: Unison Housing [\(Weblink\)](#).

Examples of Jesuit Social Services' programs for people with complex and multiple needs include Perry House, described above, and Connexions. The **Connexions** program, established in 1996, was Victoria's first dual diagnosis service working exclusively with young people (aged 16–28 years) dealing with concurrent mental health and substance misuse issues. It seeks to engage participants in relationships of trust and understanding. It integrates counselling, casework and advocacy, and enables engagement tailored to the individual needs of the young people accessing the service.

Prioritise people with mental health and substance use issues under the NHHA

Many people who participate in Jesuit Social Services' programs are eligible for, or participate in, the National Disability Insurance Scheme (NDIS), but fall into the cohort of people with 'psychosocial disabilities' who are poorly served by the NDIS.²⁴ This cohort is particularly vulnerable, commonly experiencing challenges with communication, social exclusion, finding suitable housing and employment, and maintaining physical health.²⁵ Regardless, participation in the NDIS does not facilitate access to social housing for people with psychosocial disabilities – the NDIS does not provide them with any capital funding to increase the supply of suitable supported housing, and so they must compete for access to the limited existing social housing stock in their state or territory. Jesuit Social Services would therefore like to see people with mental ill-health, substance misuse issues and complex needs added as a national priority cohort under the NHHA.

We also wish to highlight our support for the Government to consider strengthening requirements on state and territory governments in relation to national priority cohorts, as recommended in the *Inquiry into Homelessness in Australia Final Report*. To achieve a just housing system, a range of initiatives should be tailored to each priority cohort, with relevant targets, implementation plans and timelines, which are monitored, regularly reviewed and publicly reported on by each state and territory government.

Encourage integration of capital funding with targeted initiatives

Additionally, we advocate for the NHHA to play a greater role in encouraging integration of capital funding with specific initiatives targeted to people with complex, multiple and intensive long-term support needs who too often fall through the service gaps. An example of integrated service delivery is our innovative pilot program launched in 2018, [Link Youth Justice Housing Program](#), which provides after hours support to young people (aged 16–22 years) exiting the justice system who are homeless or at risk of homelessness, when mainstream services traditionally don't operate. Link secures and sustains participants' access to stable living arrangements by head leasing through partner agency VincentCare. Such partnerships provide effective models that could readily be scaled up through targeted, adequately funded, housing initiatives. Jesuit Social Services would welcome the opportunity to provide this support model in public housing settings.

²⁴ See Tune, D. (2019). Review of the National Disability Insurance Scheme Act 2013: Removing red tape and implementing the NDIS Participant Service Guarantee. Canberra, ACT: Australian Government.

²⁵ National Mental Health Consumer & Carer Forum. (2021). Position statement on psychosocial disability associated with mental health conditions. ([Weblink](#))

Jesuit Social Services recommends that the Federal Government:

- Include people with multiple and complex needs as a national priority cohort under the NHHA.
- Play a greater role in encouraging integration of housing with specific initiatives targeted to people with complex, multiple and intensive long-term support needs in the NHHA.
- Strengthen requirements on state and territory governments in relation to meeting the specific housing needs of each national priority cohort.

Ecologically sustainable housing

Jesuit Social Services is concerned to ensure that pre-existing inequities in housing across Australia's states and territories are not exacerbated by the impacts of climate change. Research shows that the changes observed in Australia's climate will continue well into the future, with more frequent and hotter days, extreme rainfall events and severe fire-prone weather expected to occur.²⁶ As we collectively face increasingly harsh climatic conditions, the lack of adequate housing for sections of our community is an inequality that is already exacerbating existing health inequities and undermine social cohesion.

According to research undertaken by Mallee Family Care and the University of Sydney in the Victorian town of Mildura, public housing is commonly "substandard and unsafe and poorly adapted to high temperatures."²⁷ These added stressors increase incidents of family violence, substance misuse and significantly impact on the mental health of tenants. We strongly emphasise the need for effective implementation of climate safe and energy efficient design in the planning and construction of all new public and community housing, and for this to become an integral part of the NHHA. Further, we advocate for the Government to partner with state and territory governments under the NHHA to retrofit all existing social housing with energy efficient upgrades.

The NHHA must also ensure that Australian governments strengthen support for vulnerable households and communities by enabling equitable access to energy-efficient housing, including through strengthening rental minimum standards. Currently, no state in Australia mandates that a landlord must ensure a sufficiently cool environment for tenants to live in.²⁸ This is despite extreme heat being the cause of death for more Australians than any other form of natural disaster.²⁹

Research shows that the changes observed in Australia's climate will continue well into the future, with more frequent and hotter days, extreme rainfall events and severe fire-prone weather expected to occur.³⁰ This reality will only compound the existing challenges facing at risk and marginalised populations, such as those experiencing homelessness.³¹ Without adequate housing and support, preventable illnesses and deaths amongst this cohort will increase.

²⁶ CSIRO. (2021). *Climate change in Australia*. CSIRO: Canberra. ([Weblink](#)).

²⁷ Lander, J., Breth-Petersen, M., Moait, R., Forbes, C. and Stephens, L., Dickson, M. (2019). Extreme heat driven by the climate emergency: Impacts on the health and wellbeing of public housing tenants in Mildura, Victoria ([Weblink](#))

²⁸ Kolovos, B. (2022, January 31). 'My apartment is literally baking': Calls for minimum standards to keep Australia's rental homes cool. *The Guardian*. ([Weblink](#))

²⁹ Victorian Council of Social Services. (2021). *Feeling the Heat*. Feeling the Heat | VCOSS. ([Weblink](#))

³⁰ CSIRO. (2021). *Climate change in Australia*. ([Weblink](#))

³¹ Jesuit Social Services. (2021). Health, housing and ecological justice: Climate change and preventing homelessness deaths. *Parity* 34.7 (2021): 41-43. ([Weblink](#))

Jesuit Social Services recommends that the Federal Government:

- Ensure effective implementation of climate safe and energy efficient design in the planning and construction of all new public and community housing.
- Partner with State and Territory governments to retrofit all existing social housing with energy efficiency upgrades.
- Require all Australian governments to strengthen support for vulnerable households and communities by ensuring equitable access to energy-efficient housing, including through strengthening rental minimum standards.