

A Gender Responsive National Housing and Homelessness Agreement

To:

State and Territory Premiers / Chief Ministers, Treasurers, Housing/Homelessness Ministers, Ministers for Violence Prevention/Safety and Ministers for Women

The National Housing and Homelessness Agreements (NHHA) heralds a long-awaited recognition of the Federal Government's role in responding to housing unaffordability and homelessness. As negotiations about these frameworks develop, we are writing to ask you to support the development of a gender-responsive NHHA and National Policy on Homelessness.

A gender-responsive approach to housing and homelessness policy in Australia is needed to engage effectively with the structural disadvantages experienced by women generally as well as the particular situations of different groups of women facing housing insecurity and unaffordability. Such an approach would also be focused on preventing homelessness arising from domestic and family violence as well as supporting victims/survivors of violence by ensuring and enabling the focus of specialist services to address and respond to the gendered drivers of women's experience of violence and homelessness. Recognition that the feminisation of poverty and violence shapes women's housing outcomes is vital if the NHHA and National Policy on Homelessness are to reshape housing systems in a way that does not unduly disadvantage women.

Together with other peak bodies, we are concerned that under the new agreement the social housing and homelessness sector may be expected to increase its capacity without additional investment.ⁱ The steps and approaches proposed here need to be implemented in a way that does not exacerbate the pressure on service providers and social infrastructure, recognising that these are already over-stretched and under-funded. As both ERA and AWAVA have previously stated, substantial additional investment is needed to meet housing needs and provide homelessness services.ⁱⁱ It is vital that the Commonwealth's commitment to the new NHHA includes funding increases and that the new Agreement embeds principles of gender-responsiveness.

Women are the primary beneficiaries of housing support systems, making up the majority of public housing tenants, Commonwealth Rent Assistance (CRA) recipients and people approaching specialist homelessness services.ⁱⁱⁱ Domestic and family violence is the single largest reason for people to seek homelessness services, and six out of ten homelessness service clients in 2014-15 were female.^{iv} Therefore issues of gender and violence are not marginal to the 'main problem' of homelessness and housing; they are central. An effective national homelessness policy has to put them at the centre.

An effective national homelessness policy also needs to address and respond to the longer-term legacy of funding and service arrangements, and to be realistic about the different sectors and purposes within which services work. Specialist women's services funded with 'homelessness money' are part of broader service sectors addressing women's needs arising from their experiences of violence and poverty. These linkages need to be recognised and strengthened in any new policy framework.

Far from being supported to extend services to meet identified needs, in 2013, 46 per cent of domestic violence service providers reported being unable to meet demand for services, and 59 per cent of domestic violence services reported having to limit service levels to try and meet demand.^v

In order to respond effectively to the profound problems that exist in homelessness and housing affordability in Australia, we ask you to advance the following principles in your negotiations:

- The steps and approaches proposed here need to be implemented in a way that does not exacerbate the pressure on service providers and social infrastructure, recognising that these are already over-stretched and under-funded.
- **The new NHHA and national policy on homelessness must reverse the critical under-funding of homelessness services, establish longer-term funding security, and eliminate turn-aways from homelessness services**, including those focused on supporting victims/survivors of violence, while ensuring these providers do not have to limit service levels in order to meet demand. They must also build on the positive and innovative work being done in States and Territories, and set standards that will support and not undermine this work. Realistically, this will require a greater investment of funding.
- **Revitalise housing support systems** with a significant and renewed commitment to direct Government investment in public housing. The swelling numbers of (particularly) older, single women approaching homelessness services have become a 'symbol of housing insecurity in Australia'^{vi} and underline the chronic, long-term underinvestment in housing support systems.^{vii} Long-term housing is the biggest gap in specialist homelessness provision with only 11% of older people in need of it able to be assisted.^{viii}
- **Recognise the diversity of responses needed across the housing continuum and the need for structural, as well as, individualised responses:** The Productivity Commission's draft report into Introducing Competition and Informed Consumer Choice into Human Services^{ix} makes recommendations to replace income-based rent setting in public housing with a standardised CRA regime. Standardised approaches such as this need to be resisted, as a diversity of housing supports is needed to respond to the multiplicity of housing stress and homelessness experiences.
- **Recognise and support a diversity of tenures:** The majority 2015 Senate Inquiry report on housing affordability, *Out of Reach*, recommended renting be recognised as a mainstream form of tenure with corresponding policy and legislative reform to ensure 'longer, safer and secure tenancies.'^x Likewise, alternative forms of ownership such as shared equity schemes and community land trusts offer a possible pathway into housing security for some mid-life women experiencing housing insecurity, and should be supported with appropriate safeguards.^{xi} Positive initiatives in tenancy reform should be rolled out to enable victims/survivors of domestic violence in all states and territories to maintain leases where appropriate, end leases early without liability in circumstances of domestic violence, hold perpetrators of violence liable for damage to property, avoid taking on perpetrators' debts, and be protected from inappropriate 'blacklisting'. Safe at Home programs focused on women's safety are vital, together with programs to address perpetrators' housing needs once they are removed from the family home.
- **Recognise and support a diversity of housing types:** All new builds should be accessible for people with disability and our ageing population. All Commonwealth funding for States and

Territories for new build housing must meet the Silver Standard Design in the Livable Housing Australia guidelines. Where possible, invest in programs which support people to modify and continue to live in their housing.

- **Recognise and support culturally appropriate housing options:** There is a need to address the lack of housing in remote communities for Aboriginal and Torres Strait Islander women in particular. People should not have to leave their communities in search of affordable housing. There is a need to make the connection between affordable housing and other social policy issues and areas, such as child protection. Too often housing affordability compounds these other issues. See, for example, recommendation 7.31 from the Grandparents who Take Primary Responsibility for Raising Their Grandchildren Senate Inquiry Report.
- **Recognise and support local women’s specialist services** through increased and longer funding terms and embedded standards reflecting the good practice principles developed by specialist women’s services over decades. These entail: (1) a rights-based approach that enables understanding of the gendered nature of the violence, its causes and consequences and (2) empowers survivors / victims by enabling self-determination, control over processes and choice. Good-practice service provision, taking (3) a client-centred approach, remains accountable to victims / survivors and (4) places their safety, needs and interests at the centre of all decisions. It also works to ensure that (5) perpetrators are held accountable for their use of violence. Good-practice service provision delivers (6) culturally-sensitive, holistic and accessible services to diverse groups of women.^{xii}
- **Treat specialist services for women facing violence as a priority program**, with dedicated funding in each State/Territory allocation for these services, strengthening services that work with Aboriginal and Torres Strait Islander women, women with disabilities, women from culturally and linguistically diverse backgrounds, LGBTIQI services and services for women who live in regional, rural or remote areas and services for women exiting prison.
- **Include specialist gendered and ageing services and advice:** as highlighted in a number of reports, programs like Assistance with Care and Housing for the Aged will need to be expanded to accommodate projected demand,^{xiii} and should include ‘light-touch’ support for older single women presenting with ‘low needs.’
- **Direct funding to providers and services with demonstrated expertise and experience** in service and housing provision to people on low-incomes and experiencing disadvantage and marginalisation.^{xiv} Opt against systems that outsource housing and homelessness services to for-profit private sector providers and/or favour large generalist services over more stand-alone specialist services. Recognise the expertise and experience of non-government services and the need to promote service sectors that are diverse in organisational form and focus.
- **Be accountable and transparent about funding for gendered services**, including services responding to violence against women. The difficulty in tracking funding for these services has been articulated by the COAG Council, ‘with funding provided under a mix of different funding streams that have a range of stated objectives, it is difficult to ensure domestic violence services have appropriate levels of funding, or to monitor where government funds are being directed in the context of changing levels of demand.’^{xv} More generally, we need a dedicated framework for the funding of prevention and response programs relating to

violence against women at the Commonwealth level, which transparently tracks and measures funding both in aggregate and through separate programs and portfolios, including housing and homelessness.

- **Link with an increase in income support payments:** the combination of an unaffordable housing market and a wholly inadequate income support system works to ‘trap people in severe rental stress.’^{xvi} Adequate income support payments, including rent assistance, are critical to ensuring women are able to access affordable and appropriate housing, particularly single mothers.^{xvii}
- **Urgently remedy the restrictions keeping women without permanent residence in unsafe situations, by reforming visa conditions, Centrelink and Medicare entitlements, the family law system, and access to social housing, in consultation with organisations working with and representing women from refugee and migrant backgrounds.**
- Recognise that many experiences of homelessness are hidden and not visible in both Census and AIHW data collections and that stigma about accessing services remains a block for many people to seek assistance. Allocate resources and create processes to effectively address less visible issues including the link between sexual violence and housing/homelessness;^{xviii} and the distinct needs of people who are trans, non-binary, lesbian, gay and bisexual (particularly young people in these groups).^{xix}

We would welcome the opportunity to contribute further to policy development in this area. If you wish to discuss the issues raised in this letter, please contact Equality Rights Alliance and Australian Women Against Violence Alliance using the details below.

Yours faithfully,



Helen Dalley-Fisher

Program Manager

Equality Rights Alliance

era.projects@ywca.org.au



Merrindahl Andrew

Program Manager

Australian Women Against Violence Alliance

pm@awava.org.au

ⁱ NSW Housing and Homelessness peaks- Statement on the confirmation of Commonwealth funding, July 2017 <https://files.tenants.org.au/resources/2017-NSW-Housing-and-Homelessness-peaks-Statement-on-the-confirmation-of-Commonwealth-funding>

ⁱⁱ Equality Rights Alliance, 2017, Pre-Budget Submission, 19 January, <http://www.equalityrightsalliance.org.au/wp-content/uploads/2017/02/ERA-Pre-Budget-Submission-17-18-Final.pdf>; Australian Women Against Violence Alliance, 2017, Pre-Budget Submission, 19 January,

https://static.treasury.gov.au/uploads/sites/1/2017/06/C2016-052_Australian-Women-Against-Violence-Alliance.pdf

ⁱⁱⁱ Australian Women Against Violence Alliance (AWAVA) and Equality Rights Alliance (ERA) 2017, Submission to the Productivity Commission Introducing Competition and Informed User Choice into Human Services Draft Report, P.5 <http://www.equalityrightsalliance.org.au/wp-content/uploads/2017/07/AWAVA-and-ERA-Submission-to-PC-Draft-Report-on-Human-Services-20170714.pdf>

^{iv} Australian Institute of Health and Welfare 2015, Specialist Homelessness Services 2014-15: Clients, Services and Outcomes, Australian Government, Canberra
<http://www.aihw.gov.au/homelessness/specialist-homelessness-services-2014-15/clients-services-outcomes/>

^v COAG Advisory Panel on Reducing Violence Against Women and their Children, 2016, *Final Report*, p. 114, <http://www.coag.gov.au/sites/default/files/communique/COAGAdvisoryPanelonReducingViolenceagainstWomenandtheirChildren-FinalReport.pdf>

^{vi} Petersen, M and Parsell, C 2014, Older Women's Pathways out of Homelessness in Australia, Institute for Social Science Research, Brisbane, P.12; Petersen, M and Parsell, C (2014) *Older Women's Pathways out of Homelessness in Australia*

<https://www.mercyfoundation.com.au/uploads/cknw/files/FINAL%20Feb%202014%20Petersen%20%20Par sell%20Older%20women's%20pathways%20out%20of%20homelessness.pdf>

^{vii} *ibid*

^{viii} *Ibid.*

^{ix} Productivity Commission 2017, Introducing Competition and Informed User Choice into Human Services: Reforms to Human Services Draft Report, Australian Government, Canberra

^x Senate Economics References Committee 2015, Out of Reach? The Australian Housing Affordability Challenge, P. 228

^{xi} Sharam, A 2015, The voices of mid-life women facing housing insecurity, Swinburne Institute for Social Research, Hawthorn

^{xii} AWAVA 2016, The role of specialist women's services in Australia's response to violence against women and their children, Canberra <http://awava.org.au/2016/04/07/research/role-specialist-womens-services-australias-response-violence-women-children>; AWAVA 2017, The Unique Role of Specialist Women's Services in Ending Violence Against Women, Canberra <http://awava.org.au/2017/08/10/research/brochure-unique-role-specialist-womens-services>

^{xiii} See, for example, Brackertz, N 2016, Effectiveness of the homelessness service system –Discussion Paper, AHURI, P. 54

^{xiv} AWAVA and ERA, 2017, Submission to the Productivity Commission
<http://www.equalityrightsalliance.org.au/wp-content/uploads/2017/07/AWAVA-and-ERA-Submission-to-PC-Draft-Report-on-Human-Services-20170714.pdf>

^{xv} COAG Advisory Panel on Reducing Violence Against Women and their Children, 2016, *Final Report*, p. 114, <http://www.coag.gov.au/sites/default/files/communique/COAGAdvisoryPanelonReducingViolenceagainstWomenandtheirChildren-FinalReport.pdf>

^{xvi} Anglicare Australia, 2017, Anglicare Australia Rental Affordability Snapshot, Canberra, P. 5

^{xvii} National Council of Single Mothers and their Children, 2016, A Small Investment for a Significant Gain – NCSMC Budget Submission

^{xviii} Zoë Morrison 2009, Homelessness and Sexual Assault, Australian Institute of Family Studies, Melbourne and National Sexual Violence Resource Centre 2014, Link Between Housing and Sexual Violence Infographic, Harrisburg

^{xix} McNair, R, Andrews, C, Parkinson, S, Dempsey, D 2017, GALFA LGBTI Homelessness Research Project Stage 1 Report LGBTI Homelessness: Preliminary findings on risks, service needs and use.