



Australian Women Against Violence Alliance and Equality Rights Alliance Submission to the Productivity Commission Introducing Competition and Informed User Choice into Human Services Draft Report

14 July 2017

AWAVA and ERA welcome the opportunity to make this submission in response to the Draft Report on Reforms to Human Services. ERA has provided previous submissions to this inquiry outlining our positions on a number of issues related to social housing and homelessness within the scope of the Terms of Reference. This submission is primarily focussed on our chief areas of concern in the draft report, which are to do with the removal of income-based rent setting in public housing, the introduction of private providers tendering for public housing management and reforms to family and community services.

Access to affordable housing is a human right. The Government's role and responsibility in delivering quality, accessible and equitable housing and homelessness services must be consistent with a human rights based approach to housing. We are concerned that the objective of taking pressure off the social housing system unduly focusses on reducing service levels for people in need of social housing, rather than focussing on the overall Government resourcing of and approach to housing assistance. With domestic and family violence being the biggest drivers of homelessness, AWAVA and ERA are concerned that proposed changes will negatively affect women and create more barriers for them to start a life free from violence. As ERA has expressed in previous submissions, approaches to housing assistance reform must be cognisant of the gendered experiences of housing stress, housing insecurity and homelessness. Reform in this area must be consistent with the existing policy frameworks to advance gender equality and prevent violence against women. For example, the Third Action Plan to Reduce Violence against Women and their Children articulates an unambiguous commitment to increase social housing stock, and to work to address the immediate, medium-term and long-term accommodation needs of women who are escaping violence.¹

¹ The Third Action Plan of the National Plan to Reduce Violence against Women and their Children, action 3.3 (b) <https://www.dss.gov.au/women/programs-services/reducing-violence/third-action-plan>

Proposed reforms to social housing and specialist homelessness services must ensure that the needs of diverse groups of women, in particular women escaping domestic and family violence are met. To do so, there is an urgent need to improve housing options for women, through a substantial increase in social housing stock available for victims of domestic violence and increased funding for women’s refuges and emergency accommodation.²

Social Housing

Draft Recommendations 5.1 and 5.2

Extend Commonwealth Rent Assistance (CRA) to cover tenants in public housing and increase the maximum CRA payment by about 15 per cent and index the maximum payment to reflect changes in rental prices nationally. Abolish the current financial assistance model in social housing and charge market rents for tenants in social housing.

The recommendation contained in the draft report to dismantle income-based rent setting in public housing and extend CRA to public housing tenants is based on the principle of increasing tenant choice and equity amongst housing assistance recipients. It is concerning that *affordability* implications appears to be under-examined in this conclusion. An increase to CRA is essential, however, the question of whether an increase could ever offset the fundamental inadequacy of most income support payments remains. We note that the National Welfare Rights Network has called for a baseline increase of 30%³ and Anglicare’s Rental Snapshot has concluded that "at current levels, income support payments are trapping people in severe rental stress, leaving people in a situation where they have to trade off other things essentials to their health and wellbeing in order to pay rent."⁴ Given "market-derived rents are subject to the vagaries of supply and demand in the private rental market,"⁵ shifting from income-based to market rents would have enormous ramifications for the affordability of public housing. Earlier this year, the NSW IPART found that "basing tenant rent contribution on anything other than household income is likely to make social housing unaffordable for most tenants" and "income-based rent contribution is the best option to ensure affordability for tenants."⁶ We reiterate from previous submissions that while individualised housing assistance is a key component in supporting people's housing needs, it must form part of a broader response which encompasses direct Government service provision. Responses to housing

² Women Legal Services NSW (2015) Discussion paper on social housing in NSW. <http://www.wlsnsw.org.au/wp-content/uploads/2013/08/WLSNSW-response-to-Social-Housing-DPfa-190215.pdf>

³ National Welfare Rights Network (2014) Making Welfare Work: Submission on the Interim Report into Australia’s Social Security system

⁴ Anglicare Australia (2017) Rental Affordability Snapshot. <http://www.anglicare.asn.au/research-reports/the-rental-affordability-snapshot/docs/default-source/default-document-library/rental-affordability-snapshot-2017>

⁵ McNelis, S., Burke, T.(2004) *Rental Systems in Australia and Overseas*, AHURI Positioning Paper No. 74 <https://www.ahuri.edu.au/research/position-papers/74>

⁶ Independent Pricing and Regulatory Tribunal News South Wales (2017) Draft Report - Review of rent models for social and affordable housing,

affordability must recognise the Government's responsibility in managing social and structural risks such as housing stress and homelessness.⁷

We are concerned by the representation of tenant *choice* in the draft report. Choice is defined as exposure to the broader housing market; this will realistically narrow options for disadvantaged and marginalised tenants. The lack of choice in property for current and prospective public housing tenants, evidenced in the practice of crisis property allocation,⁸ is a function of the severe public housing shortage. This shortage has accumulated over decades of under-investment in the sector. At its most fundamental, the proposed dissolution of income-based rent setting to enhance choice for public housing tenants will remain limited without significant supply-side measures. The draft report unpacks tenant choice with a distinction between tenant *preference* and *requirement*, the difference between which is unclear. As the report articulates: "a contribution to rent payment requires tenants to pay some of the costs of renting a more expensive property, and creates an incentives to reduce these costs."⁹ Given more expensive properties are generally closer to services and employment opportunities, distinguishing between preference and requirement is fraught. The New Zealand experience in introducing market-based rent into public housing demonstrates that tenant 'choices' (or strategies) to deal with market rent may be hidden, such as families doubling up in properties.¹⁰ Trade-offs, including housing-related poverty, will not necessarily be reflected or visible in the housing consumed and can be detrimental to the health and wellbeing of tenants.

The draft report makes clear that enhancing choice for tenants extends beyond public housing properties to the private rental market. As discussed in previous ERA submissions to this inquiry, the evidence regarding options for low-income and disadvantaged tenants in the private rental market is clear: "the market simply does not supply affordable rental housing for this group."¹¹ The lack of affordability in the private rental market is compounded by a lack of protections for low-income and disadvantaged tenants. The 2017 Report prepared by CHOICE, the National Association of Tenants' Organisations and National Shelter indicates that half of all renters report having experienced some form of discrimination when looking for a rental property in the last five years with 17% reporting discrimination for receiving government payments and 7% for being a single parent.¹² Genuinely increasing choice for tenants is incumbent on the maintenance, improvement and extension of the available range of housing assistance options. Key to individualising housing assistance has been recognition that one size does not fit all; the wholesale dissolution

⁷ Hamilton, M. (2004) The 'new social contract' and the individualisation of risk in policy. *Journal of Risk Research*, 17(4), 453-467.

⁸ Jacobs, J, Hulse, K, Stone, W, and Wiesel, I,. (2016) *Individualised housing assistance: findings and policy options*, AHURI Final Report No. 269 <https://www.ahuri.edu.au/research/final-reports/269>

⁹ Productivity Commission (2017) Draft Report – Introducing Competition and Informed User Choice into Human Services: Reforms to Human Services

¹⁰ Murphy, L,. (2003) Reasserting the 'Social' in Social Rented Housing: Politics, Housing Policy and Housing Reforms in New Zealand. *International Journal of Urban and Regional Research*, 27(1) 90-101.

¹¹ Jacobs et al.

¹² CHOICE, National Shelter, NATO (2017) Unsettled: Life in Australia's private rental market <http://tutas.org.au/wp-content/uploads/2017/02/The-Australian-Rental-Market-Report-2017.pdf>

of a model of assistance neglects and diminishes the diversity in the housing support continuum.

The representation of *equity* in the draft report is another key point of contention. As it currently stands, access to housing assistance is inequitable. The fact that households in similar circumstances can indeed receive different levels of assistance is a function of assistance allocated based on tenure rather than housing profile need.¹³ This problem is fundamentally underpinned, again, by chronic under-investment in affordable housing for people on low-incomes. Responding to this imbalance by dissolving one mode of tenure and expanding another leaves this question of suitably responding to identified need unresolved. This framing also neglects the inequities and inequalities that exist in the broader housing system and the allocation of assistance across entire housing continuum. For example, is it equitable that rent assistance is tied to income support payments? Do people not in receipt of income support but in housing need miss out? Is it equitable that community housing rents are generally set at a percentage of market rates? Is it equitable that Government support for investors outweighs support to rent assistance recipients?¹⁴ We reiterate from our previous submission that uniform approaches to achieve equity are a blunt instrument that risks entrenching and exacerbating housing inequalities. An equitable housing assistance system is one where the range of housing support options are adequately funded to meet the commensurate range of housing need.

The definition of social housing centres on subsidised rents¹⁵ and so the removal of income-based rent setting would amount to a fundamental retreat from Government responsibility in the provision of housing and an unprecedented expansion of the market into this mode of assistance. The Government's role in public housing provision is key to recognising and correcting market failure; as demonstrated earlier, capped rents in the public system have sheltered tenants from extreme unaffordability.¹⁶ Moreover, the role of the Government in providing public housing at income-based rent "offers something to the dominance of the private rental sector"¹⁷ shielding against increased competition and increased rents in the private rental market.¹⁸ There is also the under-examined issue of the potentially inflationary impact of expanding Commonwealth Rent Assistance, particularly without a comprehensive strategy to increase supply.¹⁹ Further, the notion that rent assistance is an acceptable replacement for income-based rent setting in public housing runs the risk of framing the housing problem for low-income and disadvantaged groups as

¹³ Jacobs et al.

¹⁴ Kelly, J. (2013) *Renovating Housing Policy*, Grattan Institute

¹⁵ Priemus in Murphy.

¹⁶ Baker, E, and Tually, S (2008) Women, Health and Housing Assistance: Implications in an Emerging Era of Housing Provision. *Australian Journal of Social Issues*, 43(1) 123-138.

¹⁷ Murphy

¹⁸ Baker et al.

¹⁹ Senate Standing Committee (2014) *Out of Reach? The Australian Housing Affordability Challenge*, Parliament of the Commonwealth of Australia http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Economics/Affordable_housing_2013/Report

one of affordability alone. The reality is that housing appropriateness, accessibility, security and stability are issues in addition to affordability.

Women are the main beneficiaries of housing support systems; women are the majority of public housing tenants,²⁰ Commonwealth Rent Assistance recipients²¹ and specialist homelessness services clients.²² As a result, the under-resourcing of housing safety nets disproportionately impacts women and undermines the Australian Government's gender equality objectives.²³ As explained in ERA's previous submissions to this inquiry, the provision of housing assistance is critical to women's economic and social wellbeing and reforms to this area must account for potentially unintended impacts on the status of women. Women are 14% more likely to report discrimination in the rental market than men²⁴ and are "especially susceptible to changes in the cost or affordability of housing – across all tenures."²⁵ As articulated by Baker and Tually, "shifting the emphasis in housing assistance away from publicly provided and rent-controlled housing to direct subsidisation of rents has important, largely negative consequences for the health, affordability and security of housing for many women."²⁶

Further, public housing plays a critical role in women's safety with public housing a key exit point for specialist homelessness services and crisis accommodation.²⁷ Domestic and family violence is the biggest driver for homelessness for Australian women and their children. Homelessness Australia estimates that 2,800 women fleeing domestic violence were turned away from refuges in the year 2014-2015.²⁸ A lack of safe affordable housing means women are not able to exit the crisis system, which is a major factor putting additional pressure on services.²⁹

Women experiencing multiple and intersecting marginalisations face particular and acute housing disadvantages. Women who are on temporary visas (this includes those on Bridging visas, those who are still in the process of seeking asylum, Temporary Protections Visa (TPV) and Safe Haven Enterprise Visa (SHEV) holders) as well as sponsored migrants and international students in Australia cannot access social housing due to residency requirements. This is a concern in the context of domestic and family violence (DFV). With DFV rates amongst culturally and linguistically diverse communities underreported,³⁰ potential discrimination in the

²⁰ Australian Institute of Health and Welfare (2016) Housing Assistance in Australia 2016 Supplementary Data Table 6: Number of tenants in social housing by age, sex and program, at 30 June 2015

²¹ Data on rent assistance income units by sex provided by Department of Social Services

²² Australian Institute of Health and Welfare (2016) Specialist homelessness services 2015-16 supplementary data National Table CLIENTS 1

²³ CEDAW/C/AUS/8 Australia's eighth periodic report to the Committee on the Elimination of Discrimination against Women, http://tbinternet.ohchr.org/Treaties/CEDAW/Shared%20Documents/AUS/CEDAW_C_AUS_8_5910_E.pdf

²⁴ CHOICE et al.

²⁵ Baker et al.

²⁶ Baker et al.

²⁷ Baker et al.

²⁸ Homelessness Australia (2015) New analysis shows additional \$33.8m needed to address domestic violence service gap

<http://www.homelessnessaustralia.org.au/index.php/42-news/125-new-analysis-shows-additional-33-8m-needed-to-address-domestic-violence-service-gap>

²⁹ Australian Women Against Violence Alliance (2016) Policy Brief The role of specialist women's services in Australia's response to violence against women and their children <https://awava.org.au/wp-content/uploads/2016/01/AWAVASpecialistWomensServicesPolicyBrief2016-1.pdf>

³⁰ AMES Australia (2016) Violence against women in CALD communities: Understandings and actions to prevent violence against women in CALD communities <https://www.ames.net.au/files/file/Research/20832%20AMES%20Actions%20Report%20Web.pdf>

private rental market and fears of visa cancellation,³¹ women face additional restrictions in seeking safety. Culturally and linguistically diverse (CALD) women also face cultural and language barriers to accessing domestic violence support services, women's refuges and shelters, and homelessness support services.³² Cultural beliefs and stigma can also inhibit women's ability to access appropriate services, particularly when these interact with social exclusion and language/cultural barriers, and these dynamics can contribute to homelessness being 'hidden.' Lack of appropriate homelessness services, including a lack of translators can preclude women from CALD backgrounds from accessing or even being aware of such services.³³ Social housing reform should aim to meet the needs of women who are not Australian citizens or permanent residents but are in the situations of hardships.

Recommendation: That a diversity of housing support and assistance options be retained, including the provision of income-based rent setting, to meet the diversity of women's housing needs.

Draft Recommendation 5.4

State and Territory Governments to make the management of social housing properties more contestable through open tenders.

In response to this recommendation, we hold particular concerns with consideration of private, for-profit providers in the management of social housing properties. We echo concerns from our previous submissions about the introduction of a profit motive into the management of public housing as a potential source of risk to the both the quality and affordability of the service. The level of Government control and oversight to ensure the appropriateness of public housing stock, such as accessibility and property condition, is critical. The process of accreditation that community housing providers undergo is rigorous. Demonstrated expertise and experience in housing provision to people on low-incomes and experiencing disadvantage and marginalisation is also fundamental in selecting providers. Other concerns with introducing private providers into the public housing space include the potential altering of target tenant profile³⁴ and the significantly increased need for rigorous oversight and monitoring.³⁵ Finally, outsourcing management of public housing from Government to the private sector represents a diminution of public housing as a vehicle to deliver other Government policy objectives relating to employment, health and social cohesion among others.

Recommendation: That the needs and rights of tenants are paramount in any decision-making rubric on public housing management.

³¹ Judicial Council on Cultural Diversity (2016) The Path to Justice: Migrant and Refugee Women's Experience of the Courts http://jccd.org.au/wp-content/uploads/2016/04/JCCD_Consultation_Report_-_Migrant_and_Refugee_Women.pdf

³² Saugeres, L.,(2009) "We Do Get Stereotyped": Gender, Housing, Work and Social Disadvantage, *Housing, Theory and Society*, 26(3), 193-209

³³ FECCA (2012) Women's Policy Statement –Supporting Australian Women from Culturally and Linguistically Diverse (CALD) Backgrounds <http://www.fecca.org.au/images/stories/pdfs/fecca%20womens%20policy%202012.pdf>

³⁴ Murphy.

³⁵ Jacobs et al.

Homelessness Services/Family and Community Services

Family and community services

We understand that the current inquiry is looking into a variety of family and community services. Operating within the scope of our work, recommendations below will focus on the services for victims / survivors of domestic, family and sexual violence only.

Informed choice & Competition

As noted by the Productivity Commission “People who use family and community services are not always in a position to exercise informed choice. However, the system can and should put their interests at the centre of service provision”. While on the one hand, diverse groups of women need to have a choice between a specialised or a mainstream service, on the other, these services need to be skilled, trained and sufficiently resourced to accommodate and respond to their needs.

To ensure accessibility and responsiveness to individual circumstances and life experiences, services must take into account and appropriately respond to survivors / victims who face multiple and intersecting forms of discrimination, including discrimination based on gender, age, culture, disability, ethnicity, sexual orientation, marital status, occupation, race, religion, or social status.

A properly accessible service system would include ‘mainstream’ women’s services that are fully competent to support people with a wide range of circumstances and backgrounds, together with numerous and well-resourced specialist services that are specifically devoted to supporting people with shared experiences and characteristics, such as women with disability, or Aboriginal and Torres Strait Islander women. While this system does not yet exist, services and their representative organisations recognise an obligation to work towards it both internally, through competence training, accountability and capacity-building, and externally, through sector development and by advocating for more resources to be allocated to services specifically devoted to people who are particularly marginalised. For instance, ANROWS³⁶ reports that it is important to cultivate stronger ties between specialist women’s services and local Aboriginal organisations and leaders in order to fully meet the needs of Aboriginal and Torres Strait Islander women.

Thus, there is a need for **a sustainable funding ensuring the capacity building and training of services on working with diverse populations and cultural competency.**

AWAVA and ERA also support the ACOSS Response to Productivity Commission Preliminary Findings Report that **there must be universal access to essential services regardless income of services users or their locality.**³⁷

³⁶ ANROWS (2017) Women’s specialist domestic and family violence services: Their responses and practices with and for Aboriginal women: Key findings and future directions. <https://anrows.org.au/publications/horizons-0/women%E2%80%99s-specialist-domestic-and-family-violence-services-their-responses-and>

³⁷ Australian Council of Social Service (2016) Response to Productivity Commission Preliminary Findings Report [referred to hereon in as ACOSS (1)] <http://www.acoss.org.au/wp-content/uploads/2016/11/ACOSS-Submission-to-Productivity-Commission-Competition-in-Human-Services-Preliminary-Findings-Report-Final.pdf>

It is important that **services users are in control of what services they are receiving, that these services are sufficient to address their needs.** Competition between services is not a prerequisite to ensure the quality of the service.³⁸

Specialist women's services

The current inquiry defines family and community services as ranging from “crisis support, transitional support, building capability and early intervention and prevention. Examples includes services for family support, homelessness, family and domestic violence, alcohol and other drugs and settlement services”.

Draft recommendation 7.1. i.e. to develop and publish maps of existing services; analysis of the characteristic and needs of the service user populations; and service plans to address the needs **should take into account and recognise the proven efficacy of specialist women's services in ending violence against women.**

(a) Mapping existing services

ANROWS states that despite domestic and family violence (DFV) having had a high profile in the past 2 years, “surprisingly little is known in the public domain about the help women's specialist services provide women and children affected by DFV.”³⁹

The impact and effectiveness of these specialist women's services is underpinned by a set of good practice principles that are supported by international research and evidence-based practice.⁴⁰

Over the last 40 years,⁴¹ specialist women's services have been established in response to the need for comprehensive and trauma-informed support. Guided by women-centred models of practice, these services include organisations working to address domestic and family violence (including refuges and shelters), sexual assault services and rape crisis centres (which provide support to all people regardless of gender), and organisations working with diverse groups of women including Aboriginal and Torres Strait Islander women, women from culturally and linguistically diverse backgrounds and others on issues of violence against women.

Specialist women's services work with other organisations, including women's legal services, women's health centres, women's information services, working women's centres and generalist services for diverse groups of women, to provide holistic support to women and their children so they can live free of violence. While some services responding to violence also provide support to men and other people who are non-gender binary, they do so in a way that also recognises the gendered dynamics of violence.

³⁸ Australian Council of Social Service (1).

³⁹ ANROWS (2017) Women's specialist domestic and family violence services: Their responses and practices with and for Aboriginal women: Final report <https://anrows.org.au/publications/horizons-0/women%E2%80%99s-specialist-domestic-and-family-violence-services-their-responses-and>

⁴⁰ Australian Women Against Violence Alliance.

⁴¹ Andrew, M. (2013). The institutional harvest: women's services and women's policy agencies. Maddison, S., and Sawer, M. (eds.) (2013). *The Women's Movement in Protest, Institutions and the Internet* (pp. 87-104). New York, NY: Routledge.

AWAVA has been advocating for new and existing organisations to incorporate good practice principles developed by the specialist women’s services in their service provision to achieve the best possible outcomes for women and children. Given the proven efficacy of the specialist women’s services, we do not support the claim made in this inquiry that “[all] family and community services are much less sophisticated than other systems of human service delivery”. We are calling for more support and recognition to be given to their key role in responding to violence against women.⁴²

Analysis of the needs of service user populations as well as the plans to address the needs should be a process of genuine transparent consultations building on existing expertise and the strength of the sector. The consultations should involve the variety of services (for example homelessness and specialist women’s services) and ensure that they work together to deliver best outcomes for the safety and wellbeing of women.

AWAVA and ERA support the need for the Australian, States and Territory governments to allocate sufficient funding for services to undertake comprehensive qualitative and quantitative evaluations⁴³ to reduce the existing lack of evidence. Yet it is important to ensure the flexibility of evaluating methodology, and recognition of local contexts. ANROWS notes in its report⁴⁴ that “the core concepts and outcomes [of evaluation] are not static. Nor are women’s experiences. For services, continuing to seek women’s views on what they value and whether the service contact helped them, requires a determined and strategic investment of time and people”.

(b) Evaluating and addressing the need

As community awareness about violence against women increases and condemnation of domestic and family violence and sexual abuse becomes more widespread, demand for support services has also continued to increase. The Australian Council of Social Services (ACOSS) Community Sector Survey 2012 reveals that over half of all domestic violence and sexual violence services surveyed reported that there is an increased demand for services. As a result, ACOSS found, clients face increased waiting times to access services they need, and support services continue to have no choice but to turn away clients at high rates.⁴⁵ Refuges and other accommodation services are under stress, with the ACOSS research finding 51% unable to meet demand. Nearly half (47%) of counselling and individual

⁴² ANROWS.

⁴³ As Astbury has pointed out in relation to services against sexual violence, “the pressing need to deliver services has understandably taken priority over evaluation of those services.” Astbury, J. (2006) *Services for victim/survivors of sexual assault: Identifying needs, interventions and provision of services in Australia* (ACSSA Issues No. 6). Melbourne: Australian Centre for the Study of Sexual Assault, Australian Institute of Family Studies.

⁴⁴ ANROWS

⁴⁵ Australian Council of Social Service (2012) Australian Community Sector Survey 2012, http://www.sectorconnect.org.au/assets/pdf/resources/resourcepg/advocacy/ACOSS_Community_Sector_Report_2012.pdf

support services surveyed by ACOSS were unable to meet demand – including sexual assault services and domestic and family violence services.⁴⁶

It is imperative that the Australian, State and Territory Governments provide sufficient funding to family and community services to enable them meet the increasing demand.

Improving outcomes for service users / outcomes measurement (draft recommendations 7.2, 7.3, and 7.4)

Transition to the outcome-based model of funding needs to take into account a number of considerations:

- a) Development of outcomes should be undertaken through a transparent collaboration with the family and community services sector.⁴⁷ For this collaboration to occur and to be successful, there is a need, firstly, to adequately fund the evaluation of services to develop an evidence base, and secondly, ensure overall adequate funding to services as it is central to enabling ethical accountability frameworks.
- b) AWAVA and ERA support ACOSS in its recommendation that “any shift towards outcome-based funding and reporting will also require adequate funding to meaningful evaluation, including resourcing and supporting user-led evaluation of services and programs to ensure that they are delivering outcomes that are responsive to client and community needs.”⁴⁸
- c) Services not only need to be accountable to the government, but there should be a culture of accountability developed to the women whom they serve. Moreover, within a feminist approach services also need to be accountable to themselves as women and survivors contributing to community led education, response and care. Service providers working in the field of preventing violence against women deserve mutual accountability frameworks.
- d) There should be an understanding and recognition of the evaluation process and achievement of different outcomes for different types of services and approaches to service provision. For example, while it is comparatively easy to measure secondary prevention services, primary prevention is far harder to measure. There is a need to invest in longitudinal studies of violence against women in order to inform the design and evaluation of services.
- e) In developing outcomes, it is important to ensure that this process does not force services into a short-term project-based model, but acknowledges barriers to achieving some outcomes in a given framework as well as the fact that the achievement of particular outcomes change across several systems. For example, it is impossible to eliminate violence against women, without advancing gender equality. AWAVA and ERA endorse the ACOSS position that “one significant obstacle that needs to be overcome in the shift towards outcome-based funding and reporting is short-term funding contracts which

⁴⁶ Australian Council of Social Service (2014) Australian Community Sector Survey 2014, [hereon in referred to as ACOSS (2)] http://www.acoss.org.au/images/uploads/ACSS2014_final.pdf

⁴⁷ NSW Women’s Refuge Movement Inc (Now known as Domestic Violence NSW) Response to the “Future Directions of Specialist Homelessness Services: Consultation Paper” http://dvnsw.org.au/downloads/Ghshsubmission_WRM_Final.pdf

⁴⁸ ACOSS (1)

create barriers to moving towards early intervention and prevention models that are demonstrated to deliver better outcome over the long –term.”⁴⁹

Changes to default contract length (draft recommendations 7.5 & 7.6)

AWAVA welcomes the recommendation of this inquiry to increase the default contract length to 7 years. It is important that contracts provide sufficient resources to meet the service demands, as well allocate funding for the evaluation of service outcomes. Along with increasing the funding, there is a need to acknowledge the impact of chronic underfunding by government on the effectiveness and sustainability of human service delivery.

In order to provide family and community services that meet users’ needs and make a change, services provider need to be adequately funded, funding arrangements need to be long-term and sustainable, the levels of pay need to be competitive. The community sector contributes 5% to Australia’s GDP and 8% to employment annually, employing 919,000 staff and facilitating the participation of 2 million volunteers.⁵⁰ Yet, the 2015-2016 Budget introduced a limit on salary sacrificing, essentially reducing the pay of the sector.⁵¹

⁴⁹ ACOSS (1)

⁵⁰ ACOSS (2)

⁵¹ Nielson, L., (2017) Tightening fringe benefit tax on not-for-profit organisations, APH Parliamentary Library
http://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/rp/BudgetReview201516/FBT

Australian Women Against Violence Alliance (AWAVA)

AWAVA is one of the six National Women's Alliances funded by the Australian Government to bring together women's organisations and individuals across Australia. AWAVA works to share information, identify issues and their solutions, to respond to and prevent violence against women and their children. AWAVA's role is to ensure that women's voices and particularly marginalised women's voices are heard by Government, amplifying the work of its member organisations and Friends and Supporters.

AWAVA works towards this by harnessing the expertise of its members, consisting of specialist women's services from the responding to violence against women sector, and working closely with government. Its members include organisations from every state and territory in Australia and represent organisations working on diverse issues including domestic and family violence, sexual assault, feminist pedagogy and women with disabilities.

Thank-you once again for the opportunity to respond to Productivity Commission Introducing Competition and Informed User Choice into Human Services Draft Report. We welcome the opportunity to discuss the issues further. For further information or to discuss the content of this submission, please contact Merrindah Andrew using the details below.

Equality Rights Alliance (ERA)

Equality Rights Alliance (ERA) is Australia's largest network advocating for women's equality, women's leadership and recognition of women's diversity. We bring together 61 non-government organisations and social enterprises with a focus on the impact of policy or service delivery on women.

ERA believes the advancement of women and the achievement of equality are matters of fundamental human rights. We advocate for gender equality, women's leadership and government policy responses that support women's diversity. Using a range of methods to consult and engage with women in Australia, ERA works to bring the voices of women from diverse life situations to policy makers.