



**Joint Submission of
Equality Rights Alliance
and
Women's Property Initiatives**

**to the Productivity Commission's
Review of the National Housing and
Homelessness Agreement**

16 March 2022

Equality Rights Alliance

Equality Rights Alliance (ERA) is Australia's largest network of organisations advocating for women's equality, women's leadership and recognition of women's diversity. We bring together 66 non-government organisations and social enterprises with a focus on the impact of policy or service delivery on women. We are one of the six National Women's Alliances, funded by the Commonwealth Office for Women.

This submission is endorsed in whole or in part by the following members of Equality Rights Alliance

- 2020 Women
- Aboriginal Legal Rights Movement
- Alevi Federation of Australia
- Australasian Council of Women and Policing
- Australian Baha'i Community – Office of Equality
- Australian Centre for Leadership for Women
- Australian Graduate Women
- Australian Federation of Medical Women
- Australian Motherhood Initiative for Research and Community Involvement
- Australian National Committee for UN Women
- Australian Women's Health Network
- CARE Australia
- Children by Choice
- COTA Australia
- FECCA Women's Committee
- Feminist Legal Clinic
- Fitted for Work
- Gender Equity Community of Practice
- Girl Guides Australia
- Good Shepherd Australia New Zealand
- Homebirth Australia
- Human Rights Law Centre
- Immigrant Women's Speakout Association NSW
- International Women's Development Agency
- JERA International
- Jessie Street National Women's Library
- Justice Connect
- Maternity Choices Australia
- Marie Stopes Australia
- Migrant Women's Lobby Group of South Australia
- Multicultural Women's Advocacy ACT
- National Association of Services Against Sexual Violence
- National Council of Churches of Australia Gender Commission
- National Council of Jewish Women of Australia
- National Council of Single Mothers and Their Children
- National Council of Women of Australia
- National Foundation for Australian Women
- NSW Council of Social Services
- National Older Women's Network
- National Union of Students (Women's Department)
- Project Respect
- Public Health Association of Australia (Women's Special Interest Group)
- Reproductive Choice Australia
- Of One Mind
- Safe Motherhood For All Inc
- Sexual Health and Family Planning Australia
- Soroptimist International of Australia
- Sisters Inside
- Union of Australian Women
- United Nations Association of Australia Status of Women Network
- Victorian Immigrant and Refugee Women's Coalition
- VIEW Clubs of Australia
- Women in Adult and Vocational Education
- Women in Engineering Australia
- Women on Boards
- Women's Climate Congress
- Women's Equity Think Tank
- Women's Electoral Lobby
- Women's Environment Network Australia
- Women's Housing Ltd
- Women's Information Referral Exchange
- Women's International League for Peace and Freedom
- Women's Legal Services Australia
- Women's Property Initiatives

- Women Sport Australia
- Working Against Sexual Harassment
- YWCA Australia
- Zonta International Districts 22, 23 and 24

Women’s Property Initiatives

Women’s Property Initiatives (WPI) is a not for profit registered community housing organisation providing secure and affordable homes for women and women led families on low incomes with varied backgrounds and life experiences. WPI has a Housing First approach, focussing on getting women and women led families into stable, long term homes first and then working with them to ensure they access to specialists and support networks to address other challenges in their lives.

This submission is also endorsed in whole or on part by the following organisations:



Women
With
Disabilities
Australia
(WWDA)



natsiwa

NATIONAL ABORIGINAL AND
TORRES STRAIT ISLANDER WOMEN'S ALLIANCE



National Women's
Safety Alliance



HARMONY
ALLIANCE

MIGRANT & REFUGEE
WOMEN FOR CHANGE

ERA and WPI recommend that:

1. **The federal government develop a new national strategy on housing and homelessness** incorporating a **gender perspective** and specific targets for women and older women.

We recommend a holistic strategy that aims to solve structural problems with a substantial injection of funds and an approach to housing policy which ensures that federal decisions in related areas are not actively working against the preferred housing outcomes.

A **gender lens** would address the financial insecurity of older women and the underlying causes of gender inequality. It would incorporate specific analysis of the housing needs of women with gendered targets, reflecting the different experiences and causes of homelessness among women and gender diverse people.

The gender lens would help generate specific strategies and services to address gaps in housing services for women experiencing domestic and family violence and increase in medium-to-long-term

supported accommodation services for women with complex needs. An intersectional and gender responsive needs analysis involves amplifying the voices of young women and older women as people and including them in program and building codesign processes. Without a gender lens any future National Housing and Homelessness Agreement (NHAA) will produce outcomes that are less than optimal.

2. The strategy should be predicated on the concept that **housing is a human right**. It would aim to elevate that right in domestic law, and to recast housing primarily as a social determinant of health (rather than primarily as a driver of personal and investor wealth creation).ⁱ
3. The strategy sets out **an increased role for the Commonwealth** together with the State and Territory governments in the legal framework to scaffold a future NHAA and should also explore how **Local governments** can be more involved for genuine inter-jurisdictional partnerships (in state and territory strategies that emerge from a national plan).ⁱⁱ
4. The strategy recognises the shared responsibility of all governments to address housing affordability and homelessness with a **whole-of-policy approach**, including a reference to the Commonwealth having responsibilities for the macro-policy settings which drive housing demand such as taxation and population, and to the responsibilities of State and Territory governments for land use, land supply and urban planning and development policy, infrastructure policy and tenancy legislation.

The Commonwealth is best placed to deliver leadership and capital injection into addressing housing affordability and homelessness. While housing is technically a state issue, the Commonwealth should take on a more active role in addressing the critical shortage of affordable housing stock across the country, while also assessing the impact of its broader policy framework on the housing market in Australia (including assessing whether interventions such as the Family Home Guarantee scheme are effective).

Local governments already regulate residential planning and construction with the States and Territories and are at the frontline in the experience of homelessness and should play a greater role (with resources and accountability mechanisms at state level) not just in supporting the delivery of local services but approving local development that enhances housing affordability.ⁱⁱⁱ

A whole of policy approach would also look at climate change adaptations with housing that pre-empt the cascading impacts of climate change and related weather events. Australians are five times more likely to be displaced by a natural disaster than someone living in Europe.^{iv} Recent floods across southeast Queensland and northern New South Wales have again reminded policymakers of the housing risks climate events pose.

5. The strategy should also:
 - a. reflect and incorporate the linkages between the strategy and the second **National Plan to End Violence Against Women and Children**;
 - b. reflect and incorporate the linkages between the strategy and **Australia's Disability Strategy 2021-2031**, recognising the need to ensure existing housing stock can be modified for people with disabilities and new housing is built to minimum accessibility standard; and

- c. cater for the needs of other specific and marginalised groups of concern including **young people leaving out-of-home care, Aboriginal and Torres Strait Islander people, people with disabilities** and culturally and linguistically diverse communities, including **migrants and asylum seekers**.
6. The federal government establish a **dedicated federal housing agency with a federal housing minister in Cabinet and an advisory structure** that engages with all jurisdictions and other key stakeholders including a peak body coalition of civil society housing organisations.

The agency would inform the development, resourcing and implementation of a future National Housing and Homelessness Agreement with scheduled and regular meetings between leaders of jurisdictions.

7. The national strategy would seek to reform the **Commonwealth Rental Assistance scheme** so it's better targeted and effective, learning from the Retirement Income Review (RIR) (and Harmer and Henry Tax reviews before it) that made clear that CRA is too low (Although CRA is not in the current NHHA, it directly bears on it given CRA is worth three times the Agreement per year at nearly \$6B, delivering micro-payments to renters).^v

Other recommendations more specific to a future NHHA and its funding:

8. The cornerstone of a new agreement should be a **Commonwealth Social Housing Future Growth Fund** (as suggested by the Grattan Institute and recommended in [ERA's pre-budget submission 2022-23](#), and supported by National Shelter and the peak industry body for the Australian community housing industry, CHIA). The Fund would set targets to increase and maintain quality housing stock and provide subsidies for community housing developers.

A \$20 billion Fund could support the construction of thousands of dwellings a year. The number of homes built will depend on the national strategy (with measured need), however with state government involvement, there could be over 100,000 extra social houses by 2040.^{vi} The federal government could make regular capital grants that generate dividends - allocated by the National Housing Finance and Investment Corporation (NHFIC) - to state governments and community housing providers every year. The future fund, led by a board of trustees, can drive new housing for particularly cohorts that are especially vulnerable such as older single women.

Significant investment in social housing is not just in the public interest, but is also good for the national economy.^{vii} Equity Economics estimates that an additional 30,000 social housing units would reduce the number of Australians experiencing homelessness by around 4,500 per year and save \$135 million in direct support costs.^{viii}

We want new builds funded by a social housing growth fund to be low-energy and water efficient homes under a strong low-carbon building code with renewable energy mandates (faster implementation of the National Construction Code so Australia moves beyond minimum standards). Improving housing energy efficiency is central to any effort to bring down power bills, address the health and wellbeing of households and contribute to emission reductions.^{ix}

New dwellings should also adhere to the *Liveable Housing Design Guidelines (LHDG)* Silver Level, being introduced into the NCC this year, so as to ensure homes, including flats and apartments, are

accessible for people with disabilities and older Australians. The NHHA should also ensure that all new builds under the Agreement are designed to anticipate and address the effects climate change, including design for extreme heat and cold and bushfire and flood ready design.

9. The agreement should also:

- a. target funding by focusing on ensuring housing affordability for renters and home-buyers in the bottom two or three quintiles of household incomes.
- b. offer **additional resources** (such as financial advisers and case managers for streamlined communication), **referral pathways** and **transitioned exit points** for people experiencing homelessness or using homelessness services and those in public housing. As the Productivity Commission notes in its briefing paper, one of the reasons for long wait times in social housing households often have long term or lifetime tenure and are less likely to move on than other households (p19).
- c. **increase housing choices** such as the Common Ground model of permanent, supportive housing in a purpose-built facility, for adults who have experienced chronic homelessness or are low income earners.
- d. develop more pathways for public and social housing tenants to own a property or have shared equity in property (an asset that gives tenants more control).:
 - This could contribute to freeing up public housing stock.
 - Provide for a continuum of housing options and opportunities for people on low-incomes, from renting to home purchase and the right to buy into social housing.
 - Support other forms of ownership such as cooperative housing or co-ownership models, shared equity models such as the WA Keystart scheme and rent-controlled apartments that are off limits to speculators.^x

Given the significant shortfall in social housing stock, this strategy should be implemented in a manner which does not reduce existing social housing stock. Tenants should be assisted to acquire equity in purpose built or open market properties, not in existing social housing stock.

10. Secure better measures and data sets to understand the scale of the problem (with quantitative and qualitative questions) that can feed analysis and stronger policy responses. Governments that want to develop their understanding could assign and fund a wider and more analytical role to official data-gathering or research bodies. ERA notes that the National Affordable Housing Alliance also wants a database developed to track social and affordable housing nationally and regionally so investment can be determined by need.^{xi}

11. Consider whether, when the States and Territories make contributions above the level set by the NHHA, that the Commonwealth match additional funding provided by the states.

HOUSING, WOMEN AND THE NHHA

Introduction

ERA and WPI welcome this opportunity to comment on the Productivity Commission's review into the National Housing and Homelessness Agreement ('NHHA'), a Commonwealth-State housing agreement which commenced in July 2018 and is due to expire in June 2023. This is no small task given the historic crisis of housing unaffordability in Australia.

ERA's mandate includes strengthening women's economic security and wellbeing. Safe and affordable housing is the foundation of economic security for women.^{xii} Many of ERA's members are experts in housing, including Women's Property Initiatives (WPI). They provide case study after case study that confirms that women experience compounding disadvantages that make them vulnerable to homelessness.

"I made 18 moves... informal 'rentals', living with friends, staying with my son, and a spell in a caravan park... and the toll on both my physical and mental health was huge." - Marie from Brisbane, aged 63 (Credit: Housing for the Aged Action Group and Social Ventures Australia)^{xiii}

"I feel that housing is a big issue for many Australians. As someone that has owned a house and had to leave because the mortgage was too high I feel that even 'middle class' Australians struggle with buying a house. I feel that younger generations will struggle more with having what our parents had." - YWCA Australia Young Women's Council Member.^{xiv}

"I have accepted that I may never own my own home. I think it's become a fact of life for young people. More terrifyingly, if I'm renting long-term and was to lose my job or not be able to work for a period of time, I would struggle to pay rent." – YWCA Australia Young Women's Council member.^{xv}

Decades of research demonstrate the benefits of safe, secure, accessible and affordable housing as essential to employment, educational outcomes, secure retirement, maintaining good health, keeping a family together and providing structure and routine to support public participation and leadership.^{xvi}

Scope of this submission

The Productivity Commission poses many questions in its Issues Paper. In this response, we aim to provide a birds-eye view of the NHHA and how it can be better in future iterations.^{xvii}

We do not wish to provide a history lesson on the 14 Agreements to date (of varying breadth and name) since 1945. However it is worth pointing out that the Commonwealth, States and Territories have had an enduring commitment over 75 years to cooperate to provide funds and services to deliver safe and affordable housing. The Commonwealth has facilitated and delivered good programs in the past but has not done nearly enough in recent decades.

A near collapse in investment for existing and new stock over the past ten years made the period a lost and costly decade. The cumulative effects of inattention to housing unaffordability have had a devastating impact on generations of people, especially those on low income, people living with disabilities and women at risk of homelessness.^{xviii}

The NHHA brings to the surface the issues of federalism and sovereignty; issues that the pandemic has exposed. We do not accept the recent Commonwealth assertion that responsibility for action on public and social housing and homelessness predominantly lies with States and Territory governments.^{xix}

representatives contradict themselves when they downplay the Commonwealth's role in housing policy but then intervene with economic emergency measures such as 'HomeBuilder', provide give-aways to first home buyers (that have arguably worsened housing affordability by further inflating demand for housing) and highlight the huge on-going cost of Commonwealth Rent Assistance (CRA) established to support private renters.^{xx} Further, senate committees have periodically held inquiries into housing and housing affordability concerns precisely because federal representatives believe the Commonwealth has a strategic role to play.

In 2022, the Commonwealth contributes 10% of the cost of building and maintaining social and public housing. The States and Territories are doing the heavy lifting but this wasn't always the case.

Australia has had a dedicated federal Housing Minister on and off (in the mid 1990s and mid 2000s) and a Housing Ministers' Council with a resourced secretariat. Today, the National Cabinet does have a Housing Committee but the focus of Cabinet has been almost exclusively on the pandemic response. The federal housing minister is in the outer ministry.

What is the problem the NHHA is trying to solve?

The prime objective of the NHHA (p. 3) is:

.. to contribute to improving access to affordable, safe and sustainable housing across the housing spectrum, including to prevent and address homelessness, and to support social and economic participation.

The underlying problem the jurisdictions are working to solve is unaffordable housing and to reduce and prevent homelessness. The outcome is better accessible and safe housing for all Australians.

But the problems are getting worse, especially for some cohorts.

The housing affordability problem in Australia has gone from bad to worse over the life of the most recent Agreement. Australian house prices rose by more than 20% last year after years of steady increases.^{xxi} Tenants are experiencing their biggest annual rent increases since the global financial crisis, with regional renters worst hit.^{xxii} Rental affordability remains challenging across Australia for the bottom 40% of income earners. People on low incomes can typically afford to rent up to just 10% of properties on the market.^{xxiii} Even after receiving Commonwealth Rental Assistance, a third of all recipients are still experiencing rental stress.^{xxiv} As of 2020, there were more than 148,000 households on a waiting list for public housing.^{xxv}

This has not happened overnight. Housing affordability and access to housing stock in Australia has declined for people on low incomes since the early 1980s. The Australian Institute of Health and Welfare (AIHW) says Australia's social and community housing stock increased by 7% between 2006 and 2019 but that increase is offset by a decrease of 11% in the number of public housing dwellings.^{xxvi} This is due, in part, to a large transfer of ownership and/or management of public housing stock to community housing organisations. In recent reports the Productivity Commission has recognised this problem and noted that more people are being turned away from homelessness services.^{xxvii} Estimates vary, but the Australian Housing and Urban Research Institute (AHURI) has calculated that the current shortfall in social and affordable housing means that we will need approximately 600,000 new dwellings over the next two decades.^{xxviii}

Homelessness - Women in the frame

Homelessness is getting critically worse for women, particularly for Aboriginal and Torres Strait Islander women (who are overrepresented in the social housing population), older single women, women with a disability and women with experiences of domestic or intimate partner violence.^{xxxix} Domestic and family violence is one of the main drivers of homelessness, made worse by the pandemic.^{xxx}

Taking a gender approach to housing and homelessness raises a range of economic and social structural inequities, which accumulate over the life course to exacerbate levels of housing crisis for older women. Older single women aged 55 and over are the fastest growing group to experience homelessness in Australia. The 2016 Census reported that the number of women over 55 experiencing homelessness increased by 31% to 6,866 compared to 2011. This figure is almost double the growth rate for people experiencing homelessness in Australia.^{xxxi}

These women are typically living on a low, fixed income, who have not had the opportunity to buy a home, or who have lost their home in a property settlement. Most of these women have had significant breaks from paid employment or have worked below capacity in part time or casual roles to accommodate unpaid care work to children or parents (or both), or as a result of disability limiting their engagement in the workforce. Ageing and single status are compounding factors which place non-home owning women at higher risk of homelessness or inappropriate housing.^{xxxii} This group of older women also includes women who have experienced domestic violence.

Given Australia's ageing population, our continued problem with gendered wage gaps, a lack of workplace accommodations for women with disabilities, the undervaluing of work done in women-dominated sectors and our failure to shift the dial on the unequal gender distribution of unpaid care work, the level of homelessness among single older women is projected to increase.^{xxxiii}

Older women who are homeless are often invisible to the public. Many of these women live with physical or psychosocial disabilities, with homelessness exacerbating disability and chronic health conditions. They may not recognise their experiences as homelessness and are unlikely to have their needs met by existing homelessness services.^{xxxiv} They typically move between temporary arrangements, staying with children, relatives or friends to keep a roof over their head. Some are adept at house-sitting whilst others sleep in their car when there is nowhere else to go. They are often unable to receive home care services available to other older people who are housed.

Most concerning, many women do not report violence to police and remain in relationships to avoid homelessness, even when they are experiencing violence from their partner.^{xxxv} Older women require specialist supports before they reach crisis point. Research shows that most of these women have never been homeless before but have had multiple inequalities that shape their experiences. Systematic or compounding factors include:

- Immigrant status from a non-English speaking country
- In private rental
- Difficulty raising emergency funds
- Lives with a disability
- Identifies as Aboriginal and/or Torres Strait Islander
- Has a lack of superannuation
- Worked part time or casually throughout their lives
- Took time out of the paid workforce to care for family
- Experienced age discrimination

- Difficult childhoods
- History of family violence and/or breakdown
- Experienced a dramatic life event such as the death of a spouse, serious illness, divorce or no-grounds eviction.^{xxxvi}

These structural gender disadvantages accumulating over a lifetime amounts to a feminisation of poverty.^{xxxvii}

ERA member organisations report a lack of specialist services for both women fleeing violence and older people facing homelessness due to services being under resourced, inaccessible or lacking training in cultural sensitive practices, as well chronic lack of safe, accessible and appropriate housing that clients can access or afford. As many as 155 women are being turned away by homelessness services, including women's shelters every day (compared to 80 men) and women who are Aboriginal and Torres Strait Islander, LGBTIQ+, culturally and linguistically diverse, from in rural or regional locations and / or have disabilities are more likely to be turned away for the above mentioned reasons.^{xxxviii}

Organisations delivering domestic violence and homelessness services for women report ever-increasing wait times for emergency and specialist housing and homelessness services - up to 18 months - for those women who have come forward.

WPI reports that funding for homelessness services is so inadequate, providers are consequently focussed only on crisis work, not prevention.

“The system is in crisis. When you go to the States for funding for preventative programs they aren't interested because the funding is going to response services”. - Jeanette Large, Chief Executive Officer, WPI.

Members also report that shelters are inappropriately designed and resourced - unable to adequately meet the security concerns of women and their dependents escaping violence, inaccessible for women with disability, lacking culturally appropriate design and service delivery and not tailored to the needs of older women. They report too few options for women and children to transition from emergency accommodation. The available data on housing stress and homelessness are often gender blind. Homeless mothers unaccompanied by their children are frequently invisible in models used to research and understand homelessness. Explanations for their homelessness are often subsumed into discourses of male homelessness. The consequence of this gender-blind approach is exclusion from consideration in policy responses to homelessness, which only prolongs some women's hidden homeless journeys.^{xxxix}

In an environment in which women are more likely to be caring for children and other family members, including dependants with disabilities, and violence against women is endemic, women appear to be making housing decisions based on an 'anything but homelessness' basis. The problem of housing stress for women may be significantly underreported because assessments of housing stress tend to focus on direct housing costs only, while women are more likely to accept inadequate or inappropriate housing that is affordable, but which lacks key features such as adequate heating/cooling, and physical accessibility, even if it is far away from employment options and services such as childcare, health care and disability service providers. The cumulative effect of this process can be a divesting of housing costs into other areas of life, resulting in women spending less on direct housing costs, but more on energy, transport etc and spending more time on compensating for inadequate housing through travel etc.^{xl} There can also be custody implications.

The health consequences for women with disabilities and chronic health conditions living in inadequate and inaccessible housing cannot go understated, with this situation often exacerbating pre-existing disabilities

and contributing to the development of new disabilities and chronic health conditions e.g. a low-income woman living with Postural tachycardia syndrome (PoTS, a condition where the heart rate increases on changing the posture, such as lying to sitting up or standing, causing dizziness or fainting) and without access to adequate cooling will be at severe risk of increased tachycardia and illness.

People under 30 made up the largest group accessing superannuation during the peak of the pandemic and, while that measure may have provided short term benefits during the worst of the COVID-19 outbreak, reduction in the levels of superannuation will cause future disadvantages, perpetuating the retirement income gap and reducing the ability of a generation of women to provide for their housing needs in later life.^{xii} The pandemic – highlighting the value and challenges of being in a home to safely self-isolate, recover and work from - has had a devastating impact on young people, with many now resigned to the prospect of always renting.

Young people make up around a quarter of people experiencing homelessness, and the largest number of women experiencing homeless in Australia are women aged between 25-34 years. The 2019 Productivity Commission report into Government Services revealed that young people who are receiving Commonwealth Rental Assistance are more likely to be in housing affordability stress than any other age or special needs group.^{xiii}

Member organisation, YWCA Australia reports that with declines in home ownership, rising private rental costs, and scarce availability of affordable housing, young people are experiencing high levels of housing stress but can be invisible - often couch-surfing, squatting in tents in regional areas or sleeping in their cars, which leads to compromised safety.^{xiii}

Women are the majority of people accessing services

Specialist Homelessness Services (SHS) agencies report that of the 278,300 clients they assisted in 2020–21: 6 in 10 were female (60%), 1 in 4 were children under the age of 17 (28%) and 1 in 3 (33% or 84,900) clients were living in single-parent families with one or more children when they sought support.^{xiv}

ERA is convinced that available data only tells some of the story. Homeless women and women at risk of homelessness remain more invisible than homeless men because safety issues are more acute for women and they are more likely to be caring for children. A challenge for future state and Commonwealth governments is capturing the scale of homelessness among women and how best to assist them.

In conclusion

Housing is arguably the most fundamental cross-cutting issue confronting Australian governments and yet the NHHA is failing to make headway in reducing levels of housing stress and homelessness.

The NHHA is largely transactional in nature, with the funds provided by the Commonwealth inadequate to address the scale of the problem. The NHHA, in the absence of a national strategy, is not strategic and preventative. It does not measure the problem adequately nor tackle the challenges for women. Innovative solutions are needed to prevent women becoming homeless.

A future NHHA's funding allocation should align with need as better measured, and engage diverse policies including tax and women's economic security (all policies relevant to the housing portfolio) to address the drivers of homelessness and housing precarity.

For a future NHHA to work, there must be proactive leadership at both levels of government in a genuine partnership, underpinned by a shared vision.

Rationale behind our recommendations:

Specific concerns about the NHHA and how to overcome them

- *The current NHHA lacks the anchor and focus that would be provided by a robust national housing and homelessness strategy with targets, indicators and benchmarks.*

The importance of a housing strategy is underlined by the Commonwealth's insistence that the States and Territories provide their own housing strategies as a condition of funding. Housing strategies are a critical accountability measure, but the Australian government has no binding Commonwealth plan, resulting in ad hoc policy implementation, particularly across critical but adjacent policy areas such as taxation that impacts on housing.

If the NHHA is to fulfil its objectives it needs to be framed within a housing strategy supported by both levels of government, and as a matter of urgency. ^{xiv}

- *There is a weak link between outcomes sought by the NHHA and policy at Commonwealth level.*

Housing and homelessness policy continues to be siloed or disconnected from other key areas of federal government policy, with Commonwealth decisions about areas such as taxation and fiscal policy potentially undermining the aims of the NHHA.

A broader strategy, one encouraged by the housing and homelessness sectors for years, would look at how the market operates and the tax treatment of housing, and consider their interaction with and impact on the funding of and approaches to affordable and social housing and housing affordability in Australia. A broader strategy would have stronger links between outcomes sought in an NHHA and the policy/funding model.

A broader strategy would recognise the significant overlap between the use of social and public housing by low income Australians and the affordability of the housing market more generally, and the related policy areas. ERA urges greater alignment between Commonwealth housing policy and other areas, including:

- women's safety policy and the National Plan on Ending Violence Against Women and Children
- women's workforce engagement and economic security policies
- aged care and health policies, including the Women's Health Strategy
- retirement income policies (which at the moment assume home ownership in mature age)
- national climate and energy policy
- Indigenous policies, including Close the Gap and Wiyi Yani U Thangani
- disability policy, including Australia's Disability Strategy 2021-2031
- employment policy
- child protection policies
- corrections policy
- infrastructure policy
- social security transfer and tax policies, and
- immigration/population policy

Because of a disconnect between Commonwealth policy and the NHHA, the NHHA objectives and outcomes are subject to disruption by federal government decisions, often ad hoc. In recent years the Commonwealth government has made decisions that have adversely impacted access to affordable housing with no consultation with the States and Territories.

For example, in responding to COVID-19, the Morrison Government announced in the 2020-21 budget, a snap 'HomeBuilder' scheme offering grants to eligible homeowners to renovate their properties.

The scheme, aimed at supporting building sector jobs in the short term, only reinforced existing inequities in the system as a gift to wealthy homeowners. HomeBuilder worsened construction supply chain issues (with the onset of the COVID-19 pandemic) and substantially raised the costs of timber, steel and concrete. With climate events (severe floods and storms in the summer of 2020-21) adding to pressures, the costs of urgent repairs to social housing became more prohibitive.^{xlvi} To put the HomeBuilder scheme in context, it is estimated to cost \$688m (\$2.655b over 3 years), while the Commonwealth contributes \$1.6 billion to the NHHA each year.

- *There is no departmental home for housing policy and strategy. Responsibility is spread across departments. The NHHA does not have an integrative force within federal relations infrastructure that helps deliver the NHHA, to hold the parties truly accountable to the aims, and ensure the document is meaningfully delivered. There are no mutual accountability mechanisms to facilitate regular communication between the parties.*

The NHHA holds the States somewhat accountable (as discussed, with the Commonwealth releasing money with the expectation of State plans and accounting), but the States do not hold the Commonwealth accountable for its decisions in order for it to be a genuine two-way partnership.

ERA understands that while the NHHA has strengthened information sharing arrangements tied to Commonwealth funding, the States and Territories remain reluctant to share data and only do so when they wish to.

It goes some way to explain, perhaps, why federal leadership on housing has been so wayward with a lack of momentum to find constructive solutions over time. Further, the Australian Public Service has been hollowed out so there are fewer housing experts employed internally to support the Commonwealth's policy capacity.^{xlvii}

The administrations of Rudd and Gillard had an ambitious housing policy agenda, launching a Council of Australian Governments (COAG) Reform Council and the National Housing Supply Council, established in 2008, to monitor housing demand, supply and affordability in Australia, and to highlight current and potential gaps between housing supply and demand. It was about building expertise and stronger policy. But the two councils were abolished by Tony Abbott along with a number of agencies and ministerial councils. The States were not consulted.

When the National Competition Council also lost its funding to oversee competition in housing, among other functions, in 2017, the parties in the Commonwealth-State housing agreement became less accountable to the legislation that underpins any federal-state housing agreement.

Currently housing at the Commonwealth level sits in Treasury, the Department of Social Services, the departments of Defence (and within it Veterans Affairs) and Social Security, and the National Indigenous Australians Agency.

Housing issues are raised at the level of the Council on Federal Financial Relations under the National Cabinet.^{xlviii} A relatively new federal relations architecture in the wake of COAG being disbanded sees elected officials meet on housing too infrequently to create momentum to meet the aims of the existing NHHA.

While outside the NHHA, the National Housing Finance and Investment Corporation (NHFIC) has incidentally become the key vehicle for Commonwealth housing policy, such as it is. How federal departments (Treasury and DSS which has a Housing and Homelessness Branch for example) interact with each other and their state counterparts, and how each is responsible for housing, is not really clear.

Where should housing sit? We urge the establishment of a **dedicated federal housing agency led by a cabinet-level federal minister for housing and with an advisory structure that engages the all relevant departments, States and Territories and other key stakeholders**. A better targeted and outcomes driven CRA program could sit in the agency, while administered by Centrelink/Services Australia.^{xlix}

For there to be a genuine partnership, the Commonwealth should report on its program, connected to an overarching **shared** strategy and with a formal structure that sees the responsible minister and heads of state departments (lead agencies by general agreement) regularly meet and respectfully cooperate.

- *The current NHHA lacks an adequate gender lens providing an intersectional approach to the needs of women and children at risk of homelessness and/or accessing housing and homelessness services.*

The NHHA's analysis of the experiences and needs of women and children is superficial at best. While it does include attached schedules that identify specific needs of cohorts such as Aboriginal and Torres Strait Islander people and women fleeing domestic violence, details are sparse, indicators and outcomes are not sufficiently clear and implementation relies on the States and Territories developing gender-responsive strategies.

The NHHA fails to match the needs we know are out there with the diverse housing types required to meet that need. A future strategy and subsequent NHHA must articulate and embrace a gender lens, while recognising the need for multiple, accessible and flexible housing models that also allow people, including women with disabilities, to live safely and age with dignity in place (a bigger concern for women who generally live longer than men).

We want to see the Commonwealth explicitly expect the States to improve housing for women - with better data and a shared understanding of homelessness among women and the housing needs of women - and with mechanisms to hold jurisdictions accountable.

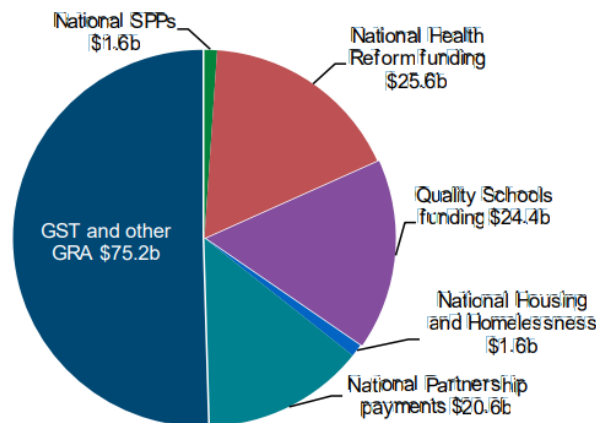
- *The NHHA does not recognise the chronic lack of investment in social and affordable housing. That problem only piles on costs associated with homelessness. If States and Territories contribute more to funds to homelessness and affordable housing, the Commonwealth is under no obligation to match the amount.*

As the recent independent statutory [review](#) of the National Housing Finance and Investment Corporation (NHFIC) Act 2018 revealed there is an enormous shortfall in social and affordable housing and the scale of investment - estimated at \$290B over 20 years - to address this. Even the government's Infrastructure Australia [2021 plan](#) recognises the scale of the gap and the need for private finance (NHFIC being given an explicit mandate to 'crowd in' other financiers) supported by forms of government subsidy.¹

The current NHHA includes around \$1.6B to \$1.7B a year with most of that capital used for maintenance of existing stock. To adequately address the lack of affordable housing stock, future Agreements would need to see the Commonwealth deliver nine times its annual and current commitment (about \$14B a year).

The graph below from National Shelter (on total Australian Government payments to the States, 2021-22 Positive Budget Measures) illustrates just how low a priority housing payments are in relation to overall payments to the States.

Total Australian Government payments to the states, 2021-22



The most recent federal budget together with the NHHA suggests that the Commonwealth has relinquished responsibility for improving social housing and homelessness service provision. As stated in the introduction, addressing housing and homelessness has largely been left up to State and Territory governments.

States and Territories are contributing varying sums, notably Victoria, which allocated \$5.3 billion in its 2020/21 budget for the construction of new social and affordable housing after many years of public housing neglect.ⁱⁱ The Big Housing Build program - to deliver 12,000 properties - has been broadly welcomed but would be even more transformative if connected to positive Commonwealth policy decisions.

ⁱ Ideally, in the context of budgets framed as wellbeing documents.

ⁱⁱ Local Government Areas governed by local councils have great potential to be a player in housing in terms of planning and understanding the different needs of regions. Local governments are the first to identify people who are sleeping rough and are an important ally working with homelessness services. Nonetheless, the Constitution does not recognise local councils as having a responsibility, and any shift would also require increasing the capacity of councils to play a role.

ⁱⁱⁱ Alan Morris et al. "Australian Local Governments and Affordable Housing: Challenges and Possibilities." *The Economic and Labour Relations Review*, vol. 31, no. 1, Mar. 2020, pp. 14–33, doi:[10.1177/1035304619880135](https://doi.org/10.1177/1035304619880135). Department of Prime Minister and Cabinet, [Reform of the Federation White Paper, Issues Paper 2](#), 2014.

^{iv} Insurance Catastrophe Resilience Report (Australia), 2020-21, p5.

^v There are mixed views about whether the CRA is inflationary and capitalised into higher rents. See Rachel Ong ViforJ, Hal Pawson, Ranjodh Singh and Chris Martin, [Demand-side assistance in Australia's rental housing market: exploring reform options](#), Final Report No. 342, 29 Oct 2020. This research suggests a CRA increase would not have a statistically significant effect on rents overall, but in disadvantaged and severely disadvantaged areas some portion of a CRA increase would be lost to increased rents. Analysis by the Grattan Institute suggests a CRA increase is unlikely to substantially increase market rents because not all of the increase will be spent on housing. ERA has called for a 50% increase in CRA in its 2022-23 Federal Budget submission as has individual ERA members including Good Shepherd in their [budget submission](#) (see pages 13-14). See also Ben Ashley, [Rent assistance in drastic need of reform](#), *West Australian*, 7 December 2020.

^{vi} A figure based on pre-pandemic research by the UNSW City Futures Research Centre and Community Housing Industry Association (CHIA). CHIA said in 2019 that if the existing deficit is not met, the gap will grow to more than 1 million homes in just 15 years time. Laurence Troy, Ryan van den Nouwelant & Bill Randolph Estimating Need and Costs of Social and Affordable Housing Delivery City Futures Research Centre, UNSW Built Environment March 2019 <https://cityfutures.be.unsw.edu.au/research/projects/filling-the-gap>

^{vii} Michael Bleby, "Australia will need 1 million more social, affordable homes by 2036", *Australian Financial Review* March 13, 2019.

^{viii} Equity Economics, "[Double Return: How investing in social housing can address the growing homelessness crisis and boost Australia's economic recovery](#)", 12 January 2021.

^{ix} See Australian Council of Social Service (ACOSS) and Brotherhood of St Laurence [Affordable, clean energy for people on low incomes](#), 2019. Australian Sustainable Built Environment Council and ClimateWorks Australia, [Built to Perform: An industry led pathway to a zero-carbon ready building code](#).

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- ^x See also proposal by Grattan Institute that would see the federal government – through the National Housing Finance and Investment Corporation (NHFIC) become a co-owner for lower-income people. Michael Read, [Shared equity scheme will solve affordability 'crisis': Grattan](#), Australian Financial Review, February 20, 2022.
- ^{xi} The alliance includes the ACTU, Australian Council of Social Service, Industry Super, Master Builders, the Property Council and Homelessness Australia among other core members.
- ^{xii} Peter Phibbs and Peter Young, [Housing Assistance and Non-Shelter Outcomes](#), AHURI, 2005
- Mike Berry, "Housing affordability and the economy: a review of macroeconomic impacts and policy issues," AHURI, 2006. ERA notes that housing as a human right is enshrined as a universal right embedded in the [International Covenant on Economic, Social and Cultural Rights](#) (Article 11). Australia has signed that international commitment but does not recognise the right to housing in domestic law.
- ^{xiii} Housing for the Aged Action Group (HAAG) and Social Ventures Australia, [At Risk](#), August 2020.
- ^{xiv} Quote from YWCA Australia [Submission](#): Standing Committee on Social Policy and Legal Affairs Inquiry into Homelessness in Australia, 2020.
- ^{xv} *Ibid.*
- ^{xvi} Centre for Social Impact and Neami National, "Ending Homelessness in Australia: An evidence and policy deep dive", February 2022.
- ^{xvii} Although this submission does go to the heart of several questions and issues posed in the Issues Paper, such as how the Australian Government and other jurisdictions interact, the effectiveness of and reporting framework and what should be the purpose of the next NHHA.
- ^{xviii} Luke Henriques-Gomes, ["Australia lost 20,000 public housing units in a decade, study finds."](#) The Guardian, 18 July 2019.
- ^{xix} The COVID-19 pandemic has necessitated a deeper look at housing stability, including issues to do with people being able to abide by social distancing orders and adapt to changing work expectations.
- ^{xx} Which now also assists social housing tenants. The NHHA does not include Commonwealth Rent Assistance, a scheme worth three times the NHHA per year (at nearly \$6B) delivering micro-payments to support, ultimately, landlords. Arguably, all it does is increase rents. On the impact of first home buyers assistance see Grattan Institute analysis - John Daley and Brendan Coates: ["Housing affordability: re-imagining the Australian dream", March 2018.](#)
- ^{xxi} Domain House Price Report, December 2021 quarter.
- ^{xxii} David Chau, [Australian renters facing biggest rent hikes in 12 years, amid surging house prices](#) ABC News, 19 July 2021.
- ^{xxiii} National Housing Finance and Investment Corporation, Housing affordability analysis, December 2021 <https://www.nhfc.gov.au/media-resources/media-releases/nhfc-releases-housing-affordability-analysis/>
- ^{xxiv} [Housing assistance in Australia, Australian Institute of Health and Welfare \(aihw.gov.au\)](#), 2020. The latest Rental Affordability Snapshot (2021) by Anglicare Australia shows that only 0.5% or 386 of the 74,000 properties available for rent across Australia were affordable for a single person on the Age Pension.
- ^{xxv} AIHW, [Housing assistance data in Australia](#), 2020
- ^{xxvi} *Ibid.* ERA acknowledges the variability of data and research in this area but trusts the summary on housing stock provided by the AIHW.
- ^{xxvii} PC, Report on Government Services: [19 Homelessness Services](#) and as reported - Stephanie Convery, [Almost half of people seeking help for homelessness in NSW in past year did not get it, report finds](#), The Guardian, January 25, 2022.
- ^{xxviii} The independent research published in 2021 was commissioned by the National Housing Finance and Investment Corporation
- ^{xxix} Australian Institute of Health and Welfare, [Homelessness and homelessness services](#), 14 August 2020. (AIHW 2021a).
- ^{xxx} Amalesh Sharma and Sourav Bikash Borah, Covid-19 and Domestic Violence: an Indirect Path to Social and Economic Crisis, Sharma, Amalesh, and Sourav Bikash Borah. "Covid-19 and Domestic Violence: an Indirect Path to Social and Economic Crisis." *Journal of family violence*, 1-7. 28 Jul. 2020, doi:10.1007/s10896-020-00188-8.
- ^{xxxi} According to the last Census, the total number of people experiencing homelessness in Australia grew by 14% to 116, 427. <http://www.abs.gov.au/ausstats/abs@.nsf/PrimaryMainFeatures/2049.0?OpenDocument>
- ^{xxxii} Sandy Darab & Yvonne Hartman, Understanding Single Older Women's Invisibility in Housing Issues in Australia, *Housing, Theory and Society*, 30:4, 348-367, 2013.
- ^{xxxiii} Australian Human Rights Commission (AHRC), [Older Women's Risk of Homelessness: Background Paper Exploring a growing problem](#), April 2019.
- ^{xxxiv} Research based in testimonials from Home at Last clients, Housing for the Aged Action Group (HAAG).
- ^{xxxv} Brandon A. Dare, Rosanna E. Guadagno, Ph.D., & Nicole Muscanell, [Commitment: The Key to women staying in abusive relationships](#), Journal of Interpersonal Relations, Intergroup Relations and Identity Volume 6, Hiver/Winter 2013.
- ^{xxxvi} Housing for the Aged Action Group (HAAG) and Social Ventures Australia, [At Risk](#), August 2020.
- ^{xxxvii} AHRC, 2019. And, Méabh Savage, Gendering Women's Homelessness, *Irish Journal of Applied Social Studies*, 1393-7022 Vol. 16(2), 2016, 43-64.
- ^{xxxviii} [Homelessness and homelessness services - Australian Institute of Health and Welfare \(aihw.gov.au\)](#), Paul Flatau et al., [Ending Homelessness in Australia](#) report, Centre for Social Impact, February 7, 2022.
- The average length of time people experience homelessness is 3.8 years and around 70% of those sleeping rough had been in out-of-home-care at some stage as a child. More than a third of respondents to a national survey say they had been in prison at

some point in their lifetime. The costs per person of healthcare associated with sleeping rough outway the costs of providing stable housing and case management to keep people off the streets.

^{xxxix} Méabh Savage, Gendering women's homelessness. *Irish Journal of Applied social studies*. Vol. 16(2), 2016, 44-65.

^{xl} This issue was noted in the Federation White Paper Task Force, *Housing and Homelessness Issues Paper*, Department of Prime Minister and Cabinet Australian Government, Canberra, 2014: "There is an important spatial dimension to affordability. As affordable housing is pushed further from easy access to jobs and transport, workforce participation and productivity can be reduced."

^{xli} Hodgson, H. 'Superannuation and COVID-19: What does early access mean for women?', Women's Policy Action Tank, 20 April 2020, available: <http://www.powertopersuade.org.au/blog/superannuation-and-COVID-19-what-does-early-access-mean-for-women/17/4/2020>, 27 May 2020.

^{xlii} [Report on Government Services Productivity Commission \(pc.gov.au\)](#), 2019.

^{xliii} YWCA Australia [Submission](#): Standing Committee on Social Policy and Legal Affairs Inquiry into Homelessness in Australia, 2020.

^{xliv} Australian Institute of Health and Welfare, [Homelessness and homelessness services Snapshot](#), Dec 2021.

^{xlv} Given there are state and territory housing agreements as a condition of Commonwealth funding, it would not be too demanding to provide input from the Commonwealth to generate a shared vision.

^{xlvi} Mark Ludlow, "[Renovation costs 'are not going back down again, that's for sure'.](#)" *Australian Financial Review*, January 28, 2022.

^{xlvii} Vivienne Milligan and Anne Tiernan, "No Home for Housing: The Situation of the Commonwealth's Housing Policy Advisory Function," *Australian Journal of Public Administration*, 2012.

^{xlviii} COAG was dismantled under Scott Morrison. Admittedly, COAG was only as effective when the Commonwealth chose to drive issues of national concern.

^{xlix} See Rachel Ong ViforJ, Hal Pawson, Ranjodh Singh and Chris Martin, [Demand-side assistance in Australia's rental housing market: exploring reform options](#), AHURI, Final Report No. 342, 29 Oct 2020.

ⁱ It says 'Australia's governments must address the growing shortfall of social housing. Government agencies should work with the sector to harness new investment options and provide high-quality social and affordable rental housing'.. 'In order for NHFIC to be able to successfully crowd in private finance, NHFIC's operations must be supported by other forms of government subsidy, whether at the Commonwealth, State or Territory or local government level.'

ⁱⁱ [Victoria's Big Housing Build | Premier of Victoria](#), November 2020.