

**INQUIRY INTO HOMELESSNESS AMONGST OLDER
PEOPLE AGED OVER 55 IN NEW SOUTH WALES**

Organisation: Council on the Ageing (COTA) NSW

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Submission:

Inquiry into homelessness amongst older people aged over 55 in New South Wales

Council of the Ageing (COTA) NSW

COTA NSW is the peak body representing people over 50 in NSW. We're an independent, non-partisan, consumer-based, non-government organisation. We work with politicians, policy makers, service and product providers, as well as the media to ensure the views and voices of older people are heard and acted on.

Our work is to:

- inform
- educate
- engage
- advocate

We work with:

- the community
- service & product providers
- government
- the media

COTA NSW has launched some of the State's most important initiatives for older people, including NSW Meals on Wheels, Carers NSW, and the Retirement Village Residents Association.

Currently COTA NSW delivers a range of services to older people in NSW, including an Aged Care Navigation service, the Legal Pathways program and Strength for Life.

Acknowledgement of Country

COTA NSW acknowledges the unique status of Australia's First Peoples as the original people of this land. We recognise their cultures, histories and ongoing relationship and obligations to the land, sky and waterways.

In the spirit of reconciliation, COTA NSW acknowledges all traditional custodians of the lands we today know as New South Wales.

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Introduction

Council on the Ageing (COTA) NSW welcomes the opportunity to provide a submission into the Legislative Council *Inquiry into homelessness amongst older people aged over 55 in New South Wales*.

The increasing numbers of older people experiencing housing stress, instability and homelessness is of major concern to COTA NSW and a key focus of our policy and advocacy platform.

In 2018, we published our annual 50+ Report with a focus on older people that were renting, in mortgage debt or experiencing homelessness. The report *Debt, rent and homelessness: An insecure future*, was based on findings from a survey completed by 7,600 older people and informed by focus groups which provided sobering statistics and personal stories.¹ The extent of the problem is evident in the regular phone inquiries received by COTA NSW by desperate older people (very often female) that have nowhere to sleep. This research and some of the stories that we have heard will be shared within this submission.

COTA NSW has also been a key member of the Ageing on the Edge NSW Forum; that was established in 2017 in response to the release of *The Older I Get the Scariest It Becomes – Older People at Risk of Homelessness in NSW*.² The forum is a coalition of 75 organisations and individuals that advocating on measures to address homelessness and housing stress amongst older people in NSW. The report *Home at Last: Solutions to end homelessness of older people in NSW* examined the significant housing challenges that many older people are currently facing, the inadequacy of current service responses to the issue and need for appropriate housing for this age group.³

COTA NSW supports the forums three key recommendations:

1. Fund a specialist older person's housing information and support service that comprises both an early intervention and crisis response, similar to the HAAG 'Home at Last' model in Victoria.
2. Lower the priority age for social housing eligibility from 80 years.

¹ COTA NSW (2018). *Debt, rent and homelessness: An insecure future*. Retrieved from:

<https://www.cotansw.com.au/publication/50-report-debt-rent-and-homelessness-an-insecure-future/>

² J. Fiedler and D. Faulkner, *The older I get the scariest it becomes: Older people at risk of homelessness in New South Wales*, 2017, accessible at: https://www.older tenants.org.au/sites/default/files/older-i-get-scarier-it-becomes_291117.pdf

³ Ageing on the Edge NSW Forum, *Home at last: Solutions to end homelessness of older people in NSW*, December 2021. Retrieved from: <https://www.older tenants.org.au/publications/home-at-lastresponding-to-homelessness-among-older-people-in-nsw>

3. Build 5,000 social and affordable homes per year for 10 years, at least 20% of which should be dedicated to older people.

Additional recommendations:

- That a database be developed that allows older people or support services to search for affordable ILUs by local government area in NSW. At present, the individual must contact each village complex to ascertain whether they manage ILUs and the terms of the residency.
- Establish a funding pool for innovative service delivery or housing developments that target at risk groups, including older people experiencing housing stress or at risk of homelessness.
- Amend the NSW Residential Tenancies Act to remove “no grounds evictions” and encourage the availability of long-term leases. Allow for tenant home modifications in instances where it would improve the accessibility and functionality for older people when not negatively affecting the value of the property.
- COTA NSW also believes the provision of housing support, crisis and homelessness services specific to older people should be an important part of the work of the Premier’s Homelessness Council and that representation should be sought from the appropriate ageing peak representing the needs of older people in NSW.
- NSW Government adopt and implement the minimum Silver Livable Housing design standard within the National Construction Code.

The rate of homelessness

For increasing numbers of older people, the risk or experience of homelessness has become a reality. The 2016 Census revealed that older Australians are an emerging group that is increasingly experiencing homelessness. From 2011 to 2016, for the age group 65 to 74, the data indicated that there was an increase of 8% in this cohort experiencing homelessness. Across Australia homelessness has increased by 54% for people aged 55-64 years and 59% for the 65-74 aged group (2006-2016). In NSW, there was an estimated 15,126 people aged 50 and over who were currently living in marginal, temporary, or improvised housing on census night.⁴

⁴ Muir, K., Martin, C., Liu, E., Kaleveld, L., Flatau, P., Etuk, L., and Pawson, H. 2018. *Amplify Insights: Housing Affordability & Homelessness*. Centre for Social Impact, UNSW Sydney.

The annual specialist homelessness services annual report (2020-21) from the Australian Institute of Health and Welfare indicated that 5216 people aged 55 or older had accessed homelessness services in NSW. The predominant need amongst this group was long term housing, following by assistance to sustain private tenancy or prevention of eviction.⁵

In 2018, COTA NSW sought to ascertain the prevalence of housing insecurity experienced by respondents in our annual survey. Participants were asked to tell us whether they had needed to rely on other people for their housing over the past five years. The results provided an indicator of levels of homelessness, insecurity, and economic wellbeing. Of the 7600 survey respondents, 553 people (7.2%) indicated that they had relied on others for their housing in the last five years. This was evenly split across the genders. These responses were further analysed by geographic location. The results indicated that 59.1% live in the Sydney Metropolitan area, 20.8% in a regional centre, 13.9% in a rural town and 6.1% in an area outside of town or remote.⁶

A report released by Social Ventures Australia and Housing for the Aged Action Group (2020) provided estimates of people aged 55+ that were classified to be at risk of homelessness in NSW. Utilising data from Household, Income and Labour Dynamics in Australia (HILDA) it was estimated that 33% of people aged over 55 in private rental and 26.5% of people aged over 55 in public rental were at risk of homelessness in the state.⁷

Further analysis by the Australian Institute of Health and Welfare (AIHW) indicates that different groups of older people may be at higher risk of homelessness. These include cohorts such as veterans, Indigenous people, people from Culturally and Linguistically Diverse (CALD) backgrounds.⁸ Of particular concern are older women, although not a large group within the totality of homeless people in Australia, they are a rapidly growing demographic in the homelessness population. The ABS (2018) indicated a 33% increase from 2011 to 2016.

It is important to note, that providing accurate statistics on the rates of homelessness for older people is challenging and likely to be under-reported. Many older people feel shame about their housing situation and are reluctant to seek official assistance. For others, they

⁵ Australian Institute of Health and Welfare (2021). *Specialist Homeless Services annual report 2020-21*. Retrieved from: <https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-annual-report/contents/older-clients>

⁶ COTA NSW (2019) 50+ report.

⁷ Housing for the Aged Action Group & Social Ventures Australia (2020). *At Risk: Understanding the population size and demographics of older women at risk of homelessness in Australia*. Retrieved from: https://www.olderrenters.org.au/sites/default/files/at_risk_final_report_web.pdf

⁸ Australian Institute of Health and Welfare (2021). *Older Australians: Housing and living arrangements*. Retrieved from: <https://www.aihw.gov.au/reports/older-people/older-australians/contents/housing-and-living-arrangements#Homelessness%20and%20insecure%20housing>

may be experiencing secondary or tertiary homelessness; relying on short-term stays with friends or family or living in inadequate accommodation such as boarding houses and would not define themselves as experiencing homelessness.

Factors affecting the incidence of homelessness

For many older Australians, housing security remains elusive. There are increasing numbers of people aged 55-64 who still have mortgage debt and for those without their own home, finding somewhere to rent that is both affordable and appropriate can be difficult and stressful.

Increasing numbers of older renters

Whilst a majority of older people in Australia (those aged 65 and over) own their own home (66.8%)⁹, NSW is witnessing a steady increase in the number of older, non-homeowners. In 2019-20, the ABS estimated that 19.1% of older people in the 55-64 age group rented, decreasing to 16% in the 65-74 cohort and 12.9% for those over 75.¹⁰

As at 30 June 2021, 2 in 3 (67%) of people aged 65 and over received the Age Pension, JobSeeker, Disability Support Payment or Carer Payment.¹¹ This has implications for non-homeowners, particularly those renting in the private market because of the lack of affordable private rentals. Research conducted in 2017 by Housing for the Aged and University of Adelaide estimated that there were 33,000 low-income older renter households in housing stress (where they pay more than 30% of household income on housing costs) in NSW. Of these low-income older households, 9314 were in severe housing stress, paying more than 50% of their income on rent.¹²

“I found it very difficult to find rent I could afford and now my rent is draining my meagre savings. I am afraid I may have to become a homeless person and I don’t think I will survive out there. I have been waiting since early 2011 for public housing to find a home or apartment for me but am not holding out much hope.” 70 – 74 Male COTA NSW survey respondent (Caringbah).

The results of the COTA NSW 2018 survey provided further evidence of the severity of housing affordability stress for older people, particularly for those receiving government

⁹ ABS (2018) 2071.0 – Census of Population and Housing: Reflecting Australia – Stories from the Census: 2016.

¹⁰ ABS (2022) Housing occupancy and costs, Australia 2019-20.

¹¹ Australian Institute of Health and Welfare (2021). *Older Australians: Income and finances*. Retrieved from: <https://www.aihw.gov.au/reports/older-people/older-australians/contents/10-income-and-finances#Income%20and%20wealth>

¹² Fiedler, Jeff; Faulkner, Debbie (2019): *“The older i get the scarier it becomes” Older people at risk of homelessness in New South Wales*. The University of Adelaide. Online resource. <https://doi.org/10.25909/5dc3732b1e809>

income support. The survey indicated that the main source of income for 39.7% of renters in the private market was either the Aged or Disability pensions. A further 7.9% of private market renters were reliant on JobSeeker. Given the primary source of their incomes, it is unsurprising that the survey found that 71.5% of older renters estimated that they spent greater than 30% of their income on rent. Alarmingly, of those individuals 11.7% estimated that they spent greater than 70% of their income on rent.¹³

Case Study: Stuart 60 – 64, Redfern. I no longer receive enough income to rent privately. My rent is subsidised by a social housing provider in Redfern. I was in a car accident some 15 years ago and unable to work. I used up my savings and the small amount of superannuation I had trying to survive. After that was gone, I was left on Social Security and had \$16 p.w. to live on. I do not have family to rely on. I was evicted as the real estate raised the rent by \$20 p.w. After about 6 months of moving between homelessness and a number of refuges, I was moved into a rent subsidised unit with this housing provider.

It is increasingly difficult, if not impossible, for older people on JobSeeker or the Aged Pension to find and secure and appropriate private rental accommodation. The annual Anglicare rental availability snapshot provides stark evidence on the availability of affordable rental properties for people on an Aged Pension or JobSeeker in NSW.¹⁴ It also dispels the myth that housing is more affordable outside of the Sydney Metropolitan area, a finding that is supported by the results of the COTA NSW survey. Older people living in regional and rural areas often have additional costs associated with living outside metropolitan areas such as limited medical services, transport and food costs.

In 2022, a single Aged-Pensioner in the Sydney Metropolitan area would be able to afford 38 properties or less than 1% of all available rentals. For JobSeeker recipients the situation is dire with 1 property affordable. In the North Coast region, only 1 property was available for a single Aged-Pensioner, and no properties for JobSeeker recipients.¹⁵ Anecdotal feedback from attendees at consultations held by COTA NSW in these areas indicated that the competition for rentals in towns with high numbers of holiday makers or students resulted in a dire situation for older people seeking affordable accommodation in these locations.

“I slept in my car in Byron Bay for 7 years; then moved back to Sydney in Sept 2016 - stay in backpacker hostels and occasionally with friends and family (usually visiting out of Sydney) - usually during peak rate season when backpacker bed rate is too

¹³ COTA NSW (2018) 50+ report.

¹⁴ Anglicare Australia (2022). *Rental affordability snapshot – regional report April 2022*. Retrieved from: <https://www.anglicare.asn.au/wp-content/uploads/2022/04/Rental-Affordability-Snapshot-National-report.pdf>

¹⁵ Anglicare Australia (2022). *Rental affordability snapshot – regional report April 2022*. Retrieved from: <https://www.anglicare.asn.au/wp-content/uploads/2022/04/Rental-Affordability-Snapshot-National-report.pdf>

expensive and sometimes not available.” 60 – 64 Female COTA NSW survey respondent (Sydney).

Insecure tenancy

The COTA NSW survey included questions to better understand the experience of renting as an older person, the results reflected the housing precariousness of all renters. Tenancies in NSW are covered by the Residential Tenancies Act 2010 (NSW), with leases typically six or 12 months in duration. Legal protections under this Act are limited, with many tenants facing rent increases, evictions without grounds and limitations on home modifications or the right to have pets.

A third of the survey respondents felt either somewhat or very insecure in their current tenancy. The predominant length of time that renters had lived in their current home was 1-5 years, 44.5% of respondents. For 28% of renters who had moved in the last 5 years, the sale of the property or the owners wishing to move in were the primary reasons that necessitated their move. The extent of rent increases also impacted 11.3% of renters and forced them to search for more affordable properties. The difficulty in finding another place to rent that they could afford in their area was of concern to 68.6% of respondents.¹⁶

“I was renting in a house with my son, where he contributed to the expenses. The owner sold the house, and my son decided he wanted to live by himself. So, I had to find somewhere much smaller to live that I could afford by myself.” 60 – 64 Female COTA NSW Survey Respondent (Hornsby).

Financial instability

The 2018 COTA NSW Survey sought to capture some of the reasons that older people had experienced housing insecurity. A total of 1925 or 21% of all respondents selected one or more circumstances or events that had occurred over the past five years that had affected the stability of their housing situation or their ability to stay in their own home. The primary triggers that contributed to people's housing instability were health issues, loss of job and divorce or separation.¹⁷

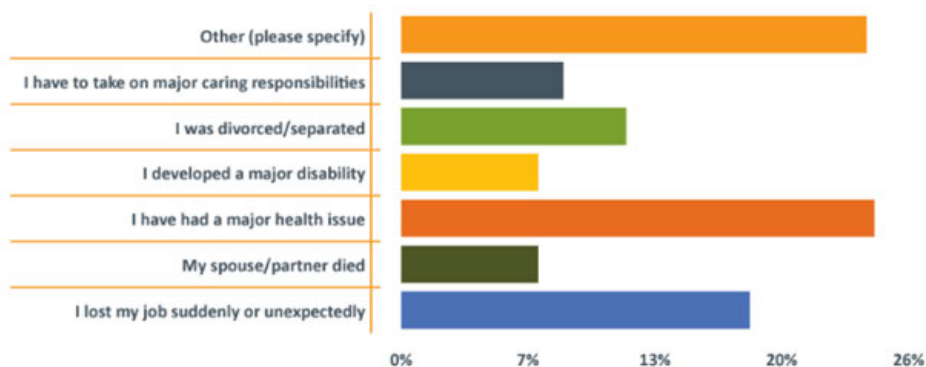
Leaving the workforce suddenly was also a major factor influencing financial stability and their ability to remain in their own home, whether rented or mortgaged. Of all survey respondents, 2349 people (or 30%) stated that they had left the workforce suddenly. Of

¹⁶ COTA NSW (2018). *Debt, rent and homelessness: An insecure future*. Retrieved from: https://www.cotansw.com.au/wp-content/uploads/sites/5/2018/09/COTA-NSW_Debt-rent-homelessness-3.pdf

¹⁷ COTA NSW (2018).

these, 15.1% were forced to leave their homes due to change in their financial circumstances.¹⁸

Circumstances or events over the past five years that have affected the stability of your housing situation or your ability to stay in your own home



n=1925

Financial hardship precipitated by the breakdown of a relationship and the ability to afford a mortgage or rental is also a common factor. A COTA 50+ report, *The twin currencies: time and money* examined how older people spent their time and money as they aged. The research provided supporting evidence for the financially protective nature of marriage in retirement, particularly in the areas of adequate superannuation and housing costs.¹⁹

According to the Association of Superannuation Funds of Australia’s (ASFA) report based on the Australian Bureau of Statistics (ABS) survey of household income and wealth, which was specifically compiled for ASFA, the average superannuation balance at retirement (assumed to be between 60-64 years of age) in 2013- 2014 was \$292,500 for men and \$138,154 for women.²⁰ This results in a gender retirement superannuation gap of 52.8% at the age of 60-64.

Consequently, women are at greater risk of housing insecurity due to significantly lower superannuation balances. Reliance on these lesser balances to meet mortgage obligations or rent in the private market increases the likelihood that these women will face poverty and housing precariousness in later life.

¹⁸ Ibid.

¹⁹ COTA NSW (2017). *The twin currencies: time and money*. Retrieved from:

<https://www.cotansw.com.au/publication/50-report-the-twin-currencies-time-and-money/>

²⁰ Clare, R. (2015), Superannuation account balances by age and gender, Sydney: Association of Superannuation Funds of Australia viewed January 31 2018, available:

<http://www.superannuation.asn.au/policy/reports>

For those older people that are unemployed and not of an age that they can receive the aged pension, JobSeeker is inadequate and a key predictor of the need to rely on others for their housing. The COTA 2018 report found that 30% of older people receiving this allowance responded had relied on others for housing and two-thirds were concerned about where they would be living in the next 5 years due to their financial circumstances. The majority of people requiring assistance from others lived in the Greater Sydney Metropolitan area, however a significant proportion of respondents resided in regional or rural locations – dispelling the common perception that these areas are affordable.²¹

The current rates of JobSeeker and the Aged Pension are insufficient to enable an older person to rent in the private market. As at 26 June 2020, 38% of JobSeeker recipients and 18% of people on the Aged Pension receive the Commonwealth Rent Assistance (CRA).²² Furthermore, the AIHW found that the number of older households (aged over 75 years) still in rental stress in NSW after receiving CRA, has increased from 13,936 to 15,333 in one year. An increase of 9%.

This inability to find affordable and appropriate housing in the private rental market is resulting in an increased need for social and affordable housing, housing insecurity and risk of homelessness.

Opportunities for early intervention to prevent homelessness

Peterson et al (2014), contend that measures to prevent homelessness exist on a continuum. That is - prevention must occur at both structural, population and individual levels.²³

There is a fundamental need at a structural level to increase the social housing stock in NSW. Investment in new housing stock has not kept pace with population growth and community demographics. In 2020, NSW's social housing stock as a proportion of overall housing was 4.71% - a decrease from 5% in 2011. The state has the third lowest social expenditure capital per capita of all states and territories and decreased in the period 2017-

²¹ COTA NSW (2018). *Debt, rent and homelessness: An insecure future*. Retrieved from: https://www.cotansw.com.au/wp-content/uploads/sites/5/2018/09/COTA-NSW_Debt-rent-homelessness-3.pdf

²² Australian Institute of Health and Welfare (2021). *Housing assistance in Australia*. Retrieved from: <https://www.aihw.gov.au/reports/hou/325/housing-assistance-in-australia/contents/financial-assistance>

²³ Petersen M., Parsell, C., Phillips, R. and White, G. (2014) *Preventing first time homelessness amongst older Australians*, AHURI Final Report No.222. Melbourne: Australian Housing and Urban Research Institute. Available from: <https://www.ahuri.edu.au/research/final-reports/222>

18 to 2019-20. This decrease in investment corresponds with a waiting list for social housing of approximately 52,000.²⁴

The need to invest in social housing was acknowledged in the NSW Government's 2016 Future Directions policy. This policy included a plan to build 23,000 social housing properties over 10 years. At this stage 10% of this target has been delivered. Whilst, acknowledging the current difficulties in resource limitations in the construction sector, there must be greater impetus to hasten the full implementation of this plan.²⁵

It is important to recognise that older people that are at risk of experiencing homelessness do not engage with traditional pathways to obtain assistance and support. As indicated previously, many older people may not recognise that they are experiencing homelessness because they are living temporarily with friends or family. There may also be shame and a reluctance to seek help. For others they are hindered by low digital literacy or financially unable to access the internet – hampering their ability to search for services or information. The importance of appropriate housing that meet the physical and safety needs of older people is also an important point of difference compared to younger cohorts and is not always considered in mainstream channels of housing assistance.

COTA NSW endorses the call of the Ageing on the Edge (NSW) Forum to establish a specialist older person's housing information and support service that comprises both an early intervention and crisis response, similar to the HAAG 'Home at Last' model in Victoria. This service would provide specialised case management and advocacy to help financially disadvantaged older people navigate the housing and aged care systems to achieve better housing outcomes when they are in housing crisis, and plan for their housing futures before reaching crisis point.

Services to support to support older people who are homeless or at risk of homelessness

There is currently no specialised homelessness service for older people over 55 in New South Wales.

²⁴ Barnes, E., Writer, T., Hartley, C. Social Housing in New South Wales: Report 1 Contemporary analysis, (2021), Sydney: Centre for Social Impact. Retrieved from:

https://www.csi.edu.au/media/uploads/social_housing_in_nsw_contemporary_analysis.pdf

²⁵ Pawson, H. and Lilley, D. (2022) Managing Access to Social Housing in Australia: Unpacking policy frameworks and service provision outcomes; CFRC Working Paper; Sydney: UNSW City Futures Research Centre. Retrieved from: https://cityfutures.adu.unsw.edu.au/documents/685/Waithood_paper.pdf

The Department of Communities and Justice (DCJ) operates the Link2home service. It is a telephone service to assist people at risk of homelessness or experiencing homelessness. Those at risk can also visit a DCJ Housing Office or Community Housing provider for assistance.²⁶

Specialist homelessness services are available for a number of groups, such as: Aboriginal People, women escaping domestic violence and young people.

The Commonwealth Government currently funds the Assistance with Care and Housing (ACH) program under the Commonwealth Home Support Package stream that can assist in those at risk of homelessness. This program is poorly funded and with low coverage across the state. It is also difficult to ascertain which agencies have received funding for this service. The program was reviewed in 2021 and it is proposed that it will be incorporated into the new Care Finder Program that is due to be implemented on 1 January 2023.²⁷

Challenges that older people experience navigating homelessness services

When an older person experiences housing insecurity or homelessness in later life. It is often for the first time. For this group, they have led conventional lives and may only find themselves in this precarious situation due to a change in life circumstances, such as divorce or redundancy.²⁸ The unexpectedness of their situation often invokes feelings of shame and no knowledge or experience in where to go to seek assistance.

Research undertaken by Australian Housing and Urban Research Institute (AHURI) into the design of homelessness services to meet the needs of older people found that older people typically experienced a range of challenges. These included:

- Overcoming shame in seeking assistance,
- requiring greater case management support and assistance filling out forms,
- unaware of what services are available,
- language barriers for older migrants, and

²⁶ Department of Communities and Justice. (n.d.) Retrieved from:

<https://www.facs.nsw.gov.au/housing/help/ways/are-you-homeless>

²⁷ Department of Health (Jan 2022) *Commonwealth Home Support Programme Assistance with Care and Housing (ACH) Provider Fact sheet*. Retrieved from:

https://www.health.gov.au/sites/default/files/documents/2022/01/assistance-with-care-and-housing_1.pdf

²⁸ Petersen M., Parsell, C., Phillips, R. and White, G. (2014) Preventing first time homelessness amongst older Australians, AHURI Final Report No.222. Melbourne: Australian Housing and Urban Research Institute. Retrieved from: <http://www.ahuri.edu.au/publications/projects/p21005>

- no age specific services.²⁹

As outlined within the Ageing on the Edge (NSW) Forum submission, the primary state government homelessness service Link2home is a telephone only service and point of referral. It is not focused on early intervention or prevention and does not have the specialist knowledge of the needs of older people. Data outlined with the submission demonstrates the lower usage of the service amongst aged 55 and over compared to younger age cohorts.

An additional concern is the requirement for a 'seeker diary' that is required to be filled out for older people in Temporary Accommodation (TA) when they have exceeded 28 days in TA. The older person must provide DCJ Housing with a rental diary that can demonstrate you have been actively searching for accommodation every 3-4 days. This is an onerous and stressful experience for older people experiencing homelessness. They may not have access to a smartphone or the internet, or not feel comfortable in the use thereof – severely limiting their ability to adhere to this policy.

The current eligibility guidelines for priority into public and community housing in NSW imparts additional barriers. At present, an older person is eligible for priority housing at aged 80 years and over, or at age 55 years and over if an Aboriginal or Torres Strait Islander person. There is a proviso that they may be able to apply for priority on other criteria such as their health, domestic violence or housing conditions. COTA NSW supports the call of the Ageing on the Edge (NSW) Forum to reduce the age of priority eligibility from 80 years. Given the average life expectancy in Australia is 82 years, an age priority set at this age is concerning.

Examples of best-practice approaches in Australia and internationally to prevent and address homelessness amongst older people

COTA NSW supports the call of the Ageing on the Edge (NSW) Forum for the replication of the successful the Housing for the Aged Action Group (HAAG) Home at Last housing information and support service, based in Victoria. This service provides assistance to older people at-risk of homelessness in navigating the housing system and facilitating access to affordable, safe and appropriate housing.³⁰

²⁹ Thredgold, C., Beer, A., Zufferey, C., Peters, A. and Spinney, A. (2019) An effective homelessness services system for older Australians, AHURI Final Report 322, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/final-reports/322>

³⁰ Ernst & Young (2021). *Home at last economic appraisal*. Retrieved from: https://www.olderrenters.org.au/sites/default/files/home_at_last_economic_appraisal_-_final_report_-_november_2021.pdf

Services can range from the provision of personalised housing information to assistance with applications for housing, support for moving and establishing a new home and if needed referral to aged care and other supports. In 2021, a cost benefit analysis was undertaken by Ernst & Young. The subsequent findings indicated that there was a benefit cost ration of 2.3 – that is the Home at Last Housing information and support service generates at least \$2.30 in societal value.

The analysis by Ernst & Young also found that the service provides additional non-financial benefits, such as: the development of community connections, reduction in the need for multiple services (inc. government agencies), and involvement of community members in volunteering opportunities within the program.³¹

Whilst not a panacea to the pressing need to invest in social housing, there are a number of innovative housing models that if implemented more widely, can contribute to further housing choice for older people.

Co-housing is emerging as a form of community living that may suit some people without the financial resources to purchase a home outright or who want social connection and their own space. This type of housing may be beneficial in particular to older women that seek both shared areas but also the security of private spaces.³² Examples of co-housing are beginning to emerge in Australia, such as Nightingale Housing in Melbourne and Common Equity in NSW, but in many instances these developments face challenges with local planning regulations and community perceptions. A willingness to provide flexibility in planning assessments when social outcomes can be demonstrated by applicants will allow for increased choice and availability of affordable housing to be delivered in our communities.

In 2017, COTA NSW undertook a review in the prevalence of low-cost Independent Living Units (ILUs) still available for rent in NSW. Between 1954 and 1986, the Commonwealth provided subsidies to not-for-profit organisations such as churches, service organisations, local organisations and local governments for the construction of dwellings for older people under the *Aged Persons Homes Act* (APHA) 1954. These ILUs were also funded from a mix of donations from fund-raising activities, donations of land from local government, donations and loans from incoming residents, as well as from the Commonwealth Government program under the Act.

³¹ Ibid.

³² University of Technology (2017). *Advancing Co-Housing for Seniors*. Retrieved from: https://opus.lib.uts.edu.au/bitstream/10453/107578/1/Cohousing%20for%20Seniors_Final%20Report.pdf

These basic units were an important avenue for many older people with limited income that provided them with an option of living in a broader retirement village community. The research conducted in 2017 and compared to a similar study conducted in 2010 found a significant reduction in the availability of these units. This was primarily due to the outdatedness and non-compliance of the dwellings required significant investment from the retirement village providers. Providers were unable to access existing government funding to upgrade these units and in a majority of cases the buildings were demolished and the sites re-developed. There are a number of providers who continue to develop and allocate ILUs specifically for older people on low incomes to rent. However, these new builds have not replaced the older stock and it is very difficult as a potential tenant or provider to source these units as no state-wide real-time database exists indicating availability.

The opportunity to provide affordable housing options in Retirement Living communities was recently examined in a report by The Retirement Living Council (2022). The report raised many of the issues that were examined by COTA NSW in 2017 and put forward a number of recommendations, including the development of a housing portal, rebates to incentivise providers to quarantine rentals in their developments and shared equity models.³³

Residential Land Lease communities are another critical provider of low-cost housing for older people with limited assets and incomes. Many older women in particular end up in this accommodation due to the shortage of public housing and social housing for emergency accommodation and ongoing accommodation. This type of housing can provide versatility of location, cost and community connection. In Western Australia, a development by My Home has constructed 18 self-contained one-bedroom units for women aged 55 years and over and that were experiencing homelessness. It is based on a Public Private Partnership (PPP) model, bring together Government, Church, Private Sector and Community Housing Providers (CHP).³⁴

However, it is important to note that in many instances this housing tenure continues to be precarious. There are examples where residents in these communities encounter unscrupulous operators, issues with utility charges and restrictions on maintenance of their sites. An additional concern is the location of these Land Lease communities. As has been demonstrated recently in Lismore, some are located near rivers or beach fronts and are at risk of natural disasters such as flooding and storms. Other communities due to their location have had permanent residents removed to enable re-development of the sites for tourism. Continued revision and improvement of the *Residential (Land Lease) Communities*

³³ Retirement Living Council (Property Council of Australia) (2022). *Retirement living – A solution for older women at risk of homelessness*. Retrieved from: <https://file-au.clickdimensions.com/propertycouncilcomau-as9gu/files/retirementliving-womenover55atriskofhomelessness.pdf>

³⁴ My Home Housing (n.d.). Retrieved from: <https://myhomehousing.org.au/>

Act 2013 is required to ensure adequate protections are in place for vulnerable residents of these communities.

In NSW, Holdsworth Homeshare has been established to match older people living alone with a younger person who can provide companionship and a rental income and receives funding from the NSW Government for its operation.³⁵ Homeshare schemes are a niche product and will only form a small component within the housing market. A report by AHURI (2022) concluded that the model is not widespread in Australia, will only appeal to limited numbers of older Australians and has low awareness in the community.³⁶

The recent policy platform of the Australian Labor Party included a shared equity model. Their subsequent election has raised the profile of this mechanism. The proposed policy is directed to lower income households and will enable potential homeowners to contribute as little as 2% of the deposit of the home price and the Federal Government holding a maximum equity contribution of 40%.³⁷ Similar schemes have been in place in Western Australia and Victoria for a number of years. It has been reported that a shared equity model was being investigated by the New South Wales Government but with a focus on first-home buyers.³⁸ This policy will have limited impact on older Australians at risk of homelessness. However, for those in the younger age cohorts (e.g. 50 – 60) who are still working and able to meet the mortgage repayments it may offer another option for secure housing and is worth exploring further.

The recent introduction of the new build-to rent planning controls within the Housing SEPP (2021) was welcomed by COTA NSW. This type of house has long been a component of an affordable housing rental mix in countries such as the United States and the United Kingdom. The availability of medium to long lease terms is particularly important to older people to ensure certainty of tenure and the opportunity to develop connections to their local community. The new Housing SEPP may encourage greater investment in this model by the private sector, however an increase in rental stock may not occur until additional financial incentives are enacted through a review of state and commonwealth tax settings.

³⁵ Holdsworth Homeshare (n.d.) Retrieved from: <https://holdsworth.org.au/homeshare/>

³⁶ Tually, S., Coram, V., Faulkner, D., Barrie, H., Sharam, A., James, A., Lowies, B., Bevin, K., Webb, E., Hodgson, H. and Cebulla, A. (2022) *Alternative housing models for precariously housed older Australians*, AHURI Final Report No. 378, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/sites/default/files/documents/2022-05/AHURI-Final-Report-378-Alternative-housing-models-for-precariously-housed-older-Australians.pdf>

³⁷ Australian Labor Party (n.d.) *Help to Buy*. Retrieved from: <https://www.alp.org.au/policies/helping-more-australians-into-home-ownership>

³⁸ Wade, M. (21/02/2022). 'We've got a financing problem': Can a shared equity scheme help Sydney's first home buyers? Sydney Morning Herald. Retrieved from: <https://www.smh.com.au/national/nsw/we-ve-got-a-financing-problem-can-a-shared-equity-scheme-help-sydney-s-first-home-buyers-20220218-p59xpg.html>

Options to better support older people to obtain and maintain secure accommodation and avoid homelessness

As outlined previously, COTA NSW supports the introduction of a specialist homelessness service in NSW based on the HAAG Home at Last service model.

To assist older people that currently residing in social housing there are key measures that service providers can implement to ensure that appropriate supports are provided to maintain tenure. Key actions include:

- Address culture of frontline service providers – many clients feel a sense of shame and disrespect when dealing with staff. This may mean a greater understanding of the diverse experiences of older people and homelessness, a willingness to demonstrate empathy and education on the different needs of older tenants.
- Communication – for those with low literacy (digital and read/writing), English as a second language and older people from Aboriginal backgrounds it is often difficult to navigate the bureaucratic process of both applying for and maintaining their housing tenure. Simplification of forms and the provision of assistance when needed would improve an often stressful and frustrating process.
- Empowerment – promotion of the rights of the applicant or tenant when dealing with agencies, such as access to easy-to-read information, privacy provisions and complaint procedures.³⁹

However, the critical measure to improve rates of homelessness amongst older people and the general population is greater investment in social housing.

The provision of adequate social housing is an essential component in the housing affordability policy mix. For these older Australians and others on fixed incomes and currently in the private rental market; the need for subsidised social housing is acute. Currently the NSW government has no strategy related to affordable housing for people over the age of 65 and no priority access for older people to public housing. In NSW, the limited supply of public housing combined with the policy of prioritising applicants with complex needs, make it more difficult for older people to access public housing.

As discussed previously, COTA NSW supports the call of the Ageing on the Edge NSW forum to lower the age for priority social housing from 80 years. The Victorian Government has changed their policies to ensure that people 55 and over are eligible for priority social

³⁹ Thredgold, C., Beer, A., Zufferey, C., Peters, A. and Spinney, A. (2019) An effective homelessness services system for older Australians, AHURI Final Report 322, Australian Housing and Urban Research Institute Limited, Melbourne. Retrieved from: <https://www.ahuri.edu.au/sites/default/files/migration/documents/AHURI-Final-Report-322-An-effective-homelessness-services-system-for-older-Australians.pdf>

housing, which recognises the severe impact that homelessness has on older people. They also calculated that their seniors housing has a higher turnover of tenancies (and therefore vacancies) compared to other stock due to older people passing away or moving into residential aged care. The policy has assisted many older people to be housed quickly with less 'red-tape' required to complete applications. The policy approach has not 'opened the flood gates' because older people seeking housing in higher demand areas may still need to be approved for other priority categories (under a points system).

Case study: Betty 82, Tweed Heads – is currently living with relatives who are renting, she has no superannuation or savings – and also owns a dog. She has attempted to secure private rental but has been advised that owners or real-estate agents won't approve her due to the dog. She is currently in the NSW Housing Pathways Program, but no progress has been made. The current situation is precarious as her relative's rental situation is also tenuous. The option of renting a van in a Residential Park has become harder as they live in a tourist focused region and many sites are being redeveloped. Betty has also been on the NSW social housing waiting list for 5 years.

The waiting list for public housing in NSW now surpasses 55,000 people. Given that there continues to be an increasing demand for social housing - which will only worsen as the population increases and rental affordability deteriorates - it is evident that the current investment in social housing is inadequate. Whilst COTA NSW acknowledges the commitment to build an additional 3400 social and affordable dwellings through the Social and Affordable Housing Fund (SAHF) by 2023, this will do little to address current and future demand for this type of housing.

NCOSS engaged Equity Economics to examine the benefits to the NSW economy if there was an increase in investment in housing. These included: additional investment in more social and affordable stock, fast-tracking the repair and maintenance of existing stock and acquiring existing empty housing stock. Equity Economics estimated that the construction of an additional 5000 social and affordable units would support 18,000 construction jobs across NSW. Furthermore, an injection of \$500 million to respond to the backlog of repairs and maintenance in existing stock would support approximately 4200 jobs. The purchase by Government of housing stock that may remain unsold in the current economic environment will support housing prices, the stability of the housing market and address the economic and social impacts of homelessness in NSW.⁴⁰

⁴⁰ Equity Economics (2020). *Supporting economic recovery in NSW: investment in social and affordable housing is critical to supporting jobs today and families into the future*. NCOSS. Retrieved from: <https://www.ncoss.org.au/policy-advocacy/policy-research-publications/supporting-economic-recovery-in-nsw-investment-in-social-and-affordable-housing-is-critical-to-supporting-jobs-today-and-families-into-the-future/>

Consideration must also be given to the importance of ageing in place. Ensuring that older people are housed in their local area (where possible) enables them to remain connected and included in their communities. Continuing to live in familiar surroundings supports independence, ensures continued access to medical and other services and contributes to their overall health and wellbeing as they age.

The adequacy of the collection of data on older people experiencing or at risk of homelessness and opportunities to improve such collection

As highlighted throughout the report, older people (particularly women) do not categorise themselves as homeless, especially if living with family or friends. Therefore, the statistics that quantify the extent of the problem are likely to be an underestimation. More nuanced research that aims to capture the numbers of older people experiencing both secondary and tertiary homelessness is needed.

COTA NSW reiterates the need for further data to be collected and made easily accessible to the public by the Department of Communities and Justice as outlined in the submission from the Ageing on the Edge (NSW) Forum (p23.). This includes more granular demographic information, information on waiting lists and housing stock and composition – especially information on housing that is built to Livable Housing Silver Level standard or higher.

The impact of homelessness on the health and wellbeing of older people and the related costs to the health system

The link between better health outcomes for older people who live in secure housing is strongly supported by research in both Australia and Overseas.⁴¹ However, for those experiencing insecure housing or homelessness the converse is true. A systematic review and analysis cited in Davies and Wood (2018) found that in developed countries, people experiencing homelessness and social exclusion had mortality rates around 10 ten times that of the general population.⁴² The impacts of housing precariousness on both mind and body, coupled with the increased likelihood of developing a chronic disease associated with ageing means that older people are particularly vulnerable to the detrimental social and health effects of insecure housing.

⁴¹ Social determinants of health: the solid facts (2003) (2nd ed.) World Health Organization.

⁴² Davis, A. and Wood, L. (2018). Homeless health care: meeting the challenges of providing primary care. Medical Journal of Australia, 209 (5).

The cumulative effect of homelessness, poverty and disadvantage over long periods may result in people experiencing age-related health conditions from as early as 45 years of age. Older people who are homeless are also particularly vulnerable to social isolation, violence, and crime. This highlights the importance of timely support to prevent homelessness, or to enable rapid rehousing, to prevent social and health problems escalating.

The specific impact of homelessness, including the matters raised above, on older women

Older single women have emerged as a group increasingly vulnerable to housing insecurity and homelessness. There are a range of factors that are contributing to a significant rise in the numbers of older women experiencing homelessness, with numerous reports and research studies being released in recent years examining these causes and proposing practical solutions. This has included reports from the Australian Human Rights Commission, the Australian Alliance to End Homelessness, and Social Ventures Australia to name but a few.

All these reports emphasise the complexity of causal factors contributing to homelessness in older women, including both the structural and the personal. Wage inequality and interrupted working lives due to caring responsibilities are contributing factors and have meant that women, especially single women, have a decreased capacity to acquire housing equity or retirement savings. For those reliant on private rental, the availability of affordable housing for a single woman on low incomes is dire - as documented in the annual Anglicare rental affordability snapshot.

For other women, personal factors will contribute to their housing insecurity and homelessness. This may include experiencing family and domestic violence, relationship breakdowns or mental health issues. Common experiences that have often been divulged to COTA NSW include the older woman may have experienced a serious illness or disability, left work for caring responsibilities, or been made redundant all of which has resulted in housing precariousness or in the worst-case situation – homeless.

“I was divorced and had clinical depression, suicidal – I had to move in with my parents as I was homeless.” 55 – 59 Female Survey Respondent (Broken Hill).

“I am living in my son’s house while caring for him. This will change if he passes away. I will be homeless & will have to look for alternative accommodation.” 70-74 Female Survey Respondent (Grafton).

Case study: Joyce 70-74, Shellharbour: My husband's business collapsed, and we were forced to sell our home of over twenty years. My husband very quickly developed cancer (I believe brought on by stress) and died. It was somewhat humiliating having to search for rental accommodation after a lifetime of self-sufficiency. I have my name down on the public housing list, but it could be up to 10 years before I am granted housing in a senior's complex. After he died, I found somewhere I could rent, but I have hardly any money left after paying rent, so I feel scared and alone.

Most older women have not experienced homelessness before and as has previously articulated have feelings of shame and fear. Research also indicates that many older women may be experiencing secondary homelessness, that is, living with friends and family in inadequate accommodation and do not identify as being homeless. Consequently, they may not present themselves to mainstream homelessness services for assistance.⁴³

Older women are more likely to need access to priority housing due to low incomes and not due to complex needs. This means that older women will not be assessed as high priority for social housing and are consequently placed on the general waiting list.⁴⁴

Case Study: Anne 64, Redfern. I no longer receive enough income to rent privately. My rent is subsidised by a social housing provider in Redfern. I was in a car accident some 15 years ago and unable to work. I used up my savings and the small amount of superannuation I had trying to survive. After that was gone, I was left on Social Security and had \$16 p.w. to live on. I do not have family to rely on. I was evicted as the real estate raised the rent by \$20 p.w. After about 6 months of moving between homelessness and a number of refuges, I was moved into a rent subsidised unit with this housing provider

There has been an acknowledgement by the NSW Government on the vulnerability of older single women and homelessness, with the Social and Affordable Housing Fund (SAHF) funding the development of purpose-built social housing for this group. Whilst this is welcomed, further investment is needed. COTA NSW supports the Ageing on the Edge (NSW) Forum's call for a target of 5,000 social and affordable homes per year for 10 years, with at least 20% of these quarantined for the use of older people.

⁴³ National Older Women's Housing and Homelessness Working Group (2018). *Retiring into poverty. A national plan for change: increasing housing security for older women*. Retrieved from: <https://www.mercyfoundation.com.au/wp-content/uploads/2018/08/Retiring-into-Poverty-National-Plan-for-Change-Increasing-Housing-Security-for-Older-Women-23-August-2018.pdf>

⁴⁴ National Older Women's Housing and Homelessness Working Group (2018).

The impact of homelessness, including the increased risk of homelessness in the community, on older people in vulnerable groups

Indigenous Australians

An examination of the case file data of the Assistance with Care and Housing (ACH) program found that simply being an older Aboriginal or Torres Strait Islander person increased your risk of homelessness later in life. Indigenous older people experience barriers with access to:

- specialised Aboriginal housing or community services,
- Indigenous staff providing culturally appropriate supports,
- basic services to provide support with financial assistance, telephones or transport.⁴⁵

This same research found that family violence disproportionately contributed to higher rates of homelessness amongst older Indigenous women, who also have limited access to Indigenous-specific victim support services.

Additional consideration must be given to the importance of remaining 'on country', family and kinship responsibilities and the structural barriers that Aboriginal and Torres Strait Islander people continue to face in this country. Indigenous communities continue to experience significant social, health and economic disparities compared to non-Indigenous Australians. These include significant housing shortages, overcrowding, social injustice and racism and poor-quality housing and local infrastructure.

Life expectancy and other health indicators for Aboriginal people continue to be significantly worse than non-Indigenous older people. Government at both state and federal levels must continue to partner with Indigenous communities and their representatives and organisations to commit to implementing culturally appropriate services and infrastructure to address the considerable disparities that they face.⁴⁶

⁴⁵ Thredgold, C., Beer, A., Zufferey, C., Peters, A. and Spinney, A. (2019) An effective homelessness services system for older Australians, AHURI Final Report 322, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/final-reports/322>

⁴⁶ Mission Australia (2017) *Ageing and Homelessness: solutions to a growing problem*. Retrieved from: <https://www.missionaustralia.com.au/publications/position-statements/ageing-and-homelessness-solutions-to-a-growing-problem>

Culturally and Linguistically Diverse (CALD) older people

As discussed previously, older people often are unaware of the availability of services to assist them or do may not have digital access to search for help. Acknowledging the precariousness of their situation and seeking assistance can also be difficult. This can be especially true for older migrants and those from culturally diverse communities. Navigating government services and other supports when English is your second language can be overwhelming. Additional barriers may exist within some older generations of migrants due to lower rates of literacy that inhibits their ability to complete forms and understand bureaucratic requirements.

For older people from some culturally diverse groups, there is a real fear of ostracism from their community if knowledge of their situation is discovered. This is often linked with a distrust of official interpreters (if they are provided), particularly amongst communities with smaller populations, as there is concern that the interpreter may share their circumstances with others.

Information and promotion of housing services, the rights of tenants and other service provision in a range of community languages must be prioritised. There are often issues with mis-translation that imparts incorrect information that results in confusion and frustration amongst culturally diverse older people.⁴⁷

Lesbian, Gay, Bisexual, Transgender, Intersex, Queer, Asexual and gender diverse (LGBTIQA+) older people

LGBT+ people are disproportionately more likely to experience homelessness in Australia. Consequently, this would also be true of older people identifying as LGBT+. A report by Housing for the Aged Action Group identified that this group experienced unique challenges that contributed to their housing vulnerability.

Research explored in the report found that the LGBT+ community:

- had a high proportion of people on low incomes,
- discrimination from real estate agents, landlords and the general community,
- life-long experiences of discrimination in housing and employment, impacting their current financial circumstances,
- higher rates of depression and anxiety, and

⁴⁷ EECV & HAAG Victoria (2015). *At Risk of Homelessness: Preventing Homelessness in Older Culturally and Linguistically Diverse Communities*. Retrieved from: https://www.olderrenters.org.au/sites/default/files/docs/eccv-haag_preventing_homelessness_report.pdf

- often experienced rejection from family and friends resulting in reduced social supports when needed.⁴⁸

The report recommended specialised training for housing support services and providers to better understand the issues impacting older LGBT+ people and referral pathways that can best support individuals. Furthermore, an examination on the current data collection of housing services and providers with the possibility of including the capture of clients' sex, orientation and gender to enable improved identification of the depth of the issue in the LGBT+ community.

Older people in regional, rural and remote areas

As highlighted earlier, housing and rental affordability and the incidence of homelessness is deteriorating across the state.

COTA NSW has heard many stories of short-term rentals in regional locations that attract tourists, with renters evicted prior to the holiday periods to enable the owner to place the dwelling on sites such as Stayz or Airbnb. There is little recourse in the Residential Tenancy Act for older people seeking housing stability. A recent ABC news article highlighted this issue in locations from Bega to Shoalhaven to the Tweed.⁴⁹

Recent natural disasters, such as the bushfires on the South Coast and the recent devastating floods in the Northern Rivers area has had a dramatic impact on the availability of affordable and adequate housing in these areas. Again, COTA NSW has heard distressing stories of older people living in their cars or sleeping on lounges of family and friends in the Lismore area. As mentioned earlier, many low-income older people move to regional areas in an attempt to access cheaper rents. Sometimes this means living in Residential Land Lease communities. One of these communities in Lismore has been flooded and destroyed multiple times as it is situated on the river or on cheaper land. Urgent consideration must be given to the provision of temporary and long-term housing options for residents in these areas, including the specialised needs of older tenants.⁵⁰

⁴⁸ Housing for the Aged Action Group (2020). *Out of the Closet, Out of Options: Older LGBTI people at risk of homelessness*. Retrieved from:

https://www.older tenants.org.au/sites/default/files/out_of_the_closet_out_of_options_-_final_report_october_2020.pdf

⁴⁹ Woodburn, J. (19/05/22) *Rental crisis caused by short-stay businesses leaving NSW tenants evicted and homeless*. ABC NEWS. Retrieved from: <https://www.abc.net.au/news/2022-05-19/rental-crisis-nsw-tenants-paying-price-evictions-homelessness/101068752>

⁵⁰ [Natassia Chrysanthos](#) Chrysanthos, N. (13/03/22). *Housing crisis worsens as locals turn to cars and floors to sleep*. Retrieved from: <https://www.smh.com.au/national/nsw/housing-crisis-worsens-as-locals-turn-to-cars-floors-to-sleep-20220311-p5a3um.html>

Social housing waiting lists continue to grow in regional areas as many existing older residents are priced out of rental markets with the influx of new tenants from larger metropolitan centres searching for seeking affordable rents. There are also limitations on the availability of a range of services, including housing, health and aged which impacts the geographic locations where they can live that will support their health and wellbeing.

Older people with disability or mobility limitations

Older people with disability or other mobility limitations that rent in the private market face significant challenges in sourcing housing that meets their accessibility needs.

There is a recognition that for many older people their current housing design will not be suitable in advancing years. That excessive steps, shower access or narrow doorways will inhibit their ability to remain in their home and in many cases their neighbourhoods as their mobility needs change. COTA NSW conducted an extensive survey in 2015 that explored older peoples' needs and wants in relation to housing.⁵¹ Respondents were asked to rate features for a future house purchase. The largest requirement was for a single storey house (62%), with an easy access bathroom and shower rated the 3rd most important. An easy access kitchen & storage and minimal steps into the home were the 5th and 6th most important features.

COTA NSW has long advocated for the introduction of increased minimum design standards of accessibility that will allow older people and the broader community to be able to live in a home that meets their needs as their circumstances change over a life course. COTA NSW supports universal design principles as espoused by Livable Housing Australia that takes a 'whole of life' approach - that is inclusive - regardless of age, ability or background. Taken in this context, universal design should not solely be considered in the realm of 'adaptable' or 'accessible' housing but as a design standard to ensure liveable communities for all. The lack of appropriate housing available for rent, especially those with a disability severely limits their options.

COTA NSW continues to advocate for the adoption of the new minimum accessibility standards within the National Construction Code by the NSW Government. The minimal changes that are required to meet the Silver Livable Housing Design standards include a step-entry, wider corridors and doorways and a shower and toilet that are easy to use. The adoption of these standards will create diverse housing stock that will provide both present and future generations with housing options for all life stages and physical ability.

⁵¹ COTA NSW (2015). *50+ Report – How and where we live*. Retrieved from: <https://www.cotansw.com.au/publication/50-report-how-and-where-we-live/>

Conclusion

Thank you for the opportunity to contribute to this inquiry.

There is a plethora of research and evidence on the factors that are contributing to homelessness in older adults. Older people should not have to endure the indignity and insecurity of experiencing housing insecurity and homelessness.

We have the solutions to address homelessness in this country. What we require is the political will and financial investment to affect change.

COTA NSW looks forward to working with the committee and welcomes the opportunity to appear at a scheduled hearing.