

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

Organisation: NSW Council of Social Service (NCOSS)

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Submission to the NSW Parliamentary Inquiry into homelessness amongst older people aged over 55 in New South Wales

NCOSS Submission

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 **ncoss**
NSW Council of Social Service

About NCOSS

The NSW Council of Social Service (NCOSS) is the peak body for the social services sector in NSW. With over 400 members and a wider network of approximately 4,000 non-government organisations, government and other entities and individuals who share our values, we advocate to alleviate poverty and disadvantage in NSW.

When rates of poverty and inequality are low, everyone in NSW benefits. With 80 years of knowledge and experience informing our vision, NCOSS is uniquely placed to bring together civil society to work with government and business to ensure communities in NSW are strong for everyone.

As the peak body for health and community services in NSW we support the sector to deliver innovative services that grow and develop as needs and circumstances evolve.

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Introduction

NCOSS welcomes the opportunity to respond to the NSW Parliamentary Inquiry into Homelessness amongst older people aged over 55 in New South Wales.

NCOSS and our partners have done much work and research over the last couple of years around housing and homelessness. We would like to point the Inquiry towards key reports including:

- [NSW Independent Flood Inquiry NCOSS Submission 20 May 2022](#)
- [After the pandemic: building a more resilient and inclusive NSW](#) (2021)
- [Rebuilding Women's Economic Security – Investing in Social Housing in New South Wales](#) (2021)
- [A Wave of Disadvantage Across NSW](#) (2020)
- [Supporting Economic Recovery in NSW: Investment in Social and Affordable Housing is Critical to Supporting Jobs Today and Families into the Future](#) (2020)
- [A Housing Strategy for NSW: Submission to Discussion Paper](#) (2020)

These reports outline what is urgently required to address the current housing crisis and improve housing outcomes for people in NSW experiencing poverty and disadvantage. Building on this work and drawing on feedback and consultations with our members we outline our recommendations to the inquiry and respond to the terms of reference in this submission.

We urge the inquiry to consider reforms that will elevate, not diminish, the role of social and affordable housing as a critical step in addressing homelessness for people over 55. Without adequate housing supply for people on low-to-moderate incomes, no amount of homelessness services will be able to fully address homelessness and meet demand, no matter how specialised and targeted.

Specialist Homelessness Services (SHS) need to be valued and supported to respond to rising demand, especially in locations that have experienced multiple adverse events. In addition an intersectional lens needs to be applied throughout the sector to ensure services are inclusive and targeted to diverse needs, including the specialised needs of those people over 55 who are experiencing or at risk of homelessness.

With the impacts of climate change increasing, further investment in localised emergency management and planning system redesign is needed to facilitate easy and timely access to housing and support, more joined up service delivery and stronger referral pathways.

First Nations ways of knowing, being, and doing have driven innovations in service delivery by First Nations community-controlled organisations (ACCOs) in response to the ongoing crises of dispossession, the pandemic, floods and bushfires. More should be done to support and grow First Nations-controlled housing providers and SHS services in the development of culturally-sensitive and diverse housing options for First Nations people.

In addition it is timely that all levels of government respond to the fact that nearly four out of 10 Australians are renters and implement measures to improve the quality, affordability, suitability and security of the private rental market.

With state-wide labour shortages impacting the social services sector and the building and construction industry, particularly in regional areas, a holistic joined-up approach needs to be developed in order to effectively address homelessness and improve housing supply and services for older people.

Summary of recommendations

1. Advocate through the National Cabinet for the Federal Government to develop, in partnership with states and territories, a National Housing and Homelessness Strategy that enables:
 - Building 5,000 additional units of social housing in NSW every year for the next 10 years.
 - Upgrading existing social housing stock to protect against heat, cold, mould, and pollution; and reduce energy bills by improving energy efficiency.
 - An increase in Commonwealth Rent Assistance of 50% to improve affordability for low-income renters.
2. Make immediate improvements to social housing and homelessness services for older people through:
 - Lowering the age for priority housing from 80 years of age.
 - Introducing older persons housing services similar to Home at Last.
 - Expanding Housing First programs to eliminate rough sleeping by 2030.
 - Integrating Specialist Homelessness Services with the broader housing system.
 - Increasing funding for Specialist Homelessness Services by 20% and providing contract certainty of at least 5 years.
 - Taking action to reduce red tape, streamline reporting requirements and ease the administrative burden for NGO's providing essential frontlines services.
3. Embed place-based NGOs in emergency management systems to improve local emergency planning, responses, and recovery, including the provision of adequate housing.
4. Tackle the housing crisis across the Northern Rivers, by undertaking a rapid 'Social Housing Repair, Rebuild and Construct' program in collaboration with Community Housing Providers (CHPs), and guided by an overarching Masterplan to ensure resilience to future disasters, that:
 - Fast-tracks the repair and rebuild of existing social housing in the right locations.
 - Makes recovery grants immediately available to local community housing, Aboriginal and homelessness services to support people, including older people made homeless as a result of the floods.
 - Involves comprehensive, immediate planning of sufficient temporary housing villages in consultation with CHPs and other relevant NGOs that incorporates access to appropriate support services and relevant initiatives to build cohesion and mitigate the potential to exacerbate trauma and poor outcomes for impacted families and households.
 - Invests in sufficient, additional social and affordable housing to address the already critical shortage in the region, made worse by the recent disaster.
5. In keeping with the Closing the Gap Agreement, partner with the NSW Aboriginal Land Council, the network of Local Aboriginal Land Councils, ACHIA, Aboriginal community-controlled housing

providers and Specialist Homelessness Services to improve housing outcomes for Aboriginal people in NSW by:

- Supporting the growth of the Aboriginal community-controlled housing and homelessness sectors.
- Increasing funding for existing Aboriginal community-controlled services by at least 20%.
- Significantly increasing Aboriginal community-controlled and culturally-appropriate housing to address overcrowding and homelessness from natural disasters.
- Creating opportunities for Aboriginal people to participate in the service delivery, design, management and governance of social and affordable housing in our state.

6. Make renting a viable, long-term option by:

- Ensuring renters have legislative protection against unfair evictions by amending the *Residential Tenancies Act 2010* to include a list of reasonable grounds and protections against the false use of eviction grounds.
- Setting minimum standards in rental housing for health, safety and energy efficiency to protect against heat, cold, mould, and pollution; and reduce energy bills by improving energy efficiency.
- Mandating minimum accessibility standards (Silver Level Livable Design) in NSW building regulation.

Broad Overview – The Rate of Homelessness

Australia, New Zealand and the UK have the highest rates of homelessness for countries in the OECD with similar definitions of homelessness.¹ Finland, Poland and Norway have the lowest rates. If NSW were to set its sights on achieving similar rates of homelessness to these countries it would translate into giving 30,000 people experiencing homelessness a safe, appropriate, and long-term roof over their head.

The census data for 2016 shows that in NSW, 37,715 people were experiencing homelessness on census night. This is an increase of 37% from 2011. It included 2,278 First Nations people (approximately 6% of the homeless population) and 6,411 older people over the age of 55 (approximately 17% of the homeless population). The total homelessness figure included:

- 2,588 people sleeping rough
- 5,861 people in supported accommodation
- 5,350 people staying temporarily with other households
- 6,869 people living in boarding houses
- 222 people in other temporary lodgings
- 16,821 people in severely crowded dwellings.²

More recent figures for the Specialist Homelessness Services (SHS) sector show that in NSW in 2020–21, higher rates of homelessness were reported for some cohorts compared to the previous year. This included First Nations clients, older people 55 and over, clients who had experienced family and domestic violence, clients with disability, and clients with a mental health issue.³ In addition, it is likely that rates of homelessness for older people have been underestimated.

“In some instances older women are moving from one insecure situation to the next, staying with friends or family, without recognising that they are homeless. There is a degree of hidden homelessness.....living at friends or relatives’ homes, couch surfing, pet sitting, travelling etc. that is not counted in statistics and the clients do not recognise they are in fact homeless” Community service provider, regional NSW, 2020

There are a number of groups who are more vulnerable to homelessness including women, children and young people, refugees and asylum seekers, First Nations people, and people with mental illness.⁴ While First Nations people in NSW have lower rates of homelessness than in some other states and territories (QLD, WA, SA, NT)⁵, their rate of homelessness is still 75% higher than for the rest of the population.⁶

Recent events have demonstrated the impact that collaboration between government and the community sector can have on addressing enduring problems. The response to protect and house people experiencing homelessness during the emergence of COVID-19 is an example of what can be done under extraordinary circumstances. In contrast, inadequate collaboration with NGOs by emergency response

management systems in the Northern Rivers region during the recent floods has shown what can happen when governments get it wrong.

Impacts of homelessness

A home provides the foundation on which people can build their wellbeing and manage life's opportunities and challenges. A decent, secure home keeps people safe from extreme weather, supports good health, protects women and children fleeing violence, allows ageing in place and provides the basis for people to engage productively in their community.

"I am a woman, I have had career breaks to raise my child, I have balanced work with caring responsibilities, balanced work with the cost of childcare (which sometimes didn't breakeven), my super is low, and I have needed to dip into it at times. But I am one of the lucky ones to have had stable, affordable accommodation, and the support of the Community Housing sector. There are too many that have not had this opportunity, too many that are needing to rely on handouts, on charities, too many that are disempowered every day with the significant effort to keep food on the table, a roof over their head and those of their children, to keep the power on, a phone connected, and to also hide the stress from their children and loved ones." Community Housing Tenant 2021⁷

Homelessness can expose people to violence and victimisation, including rape and sexual assault, result in long-term unemployment and lead to the development of chronic ill health. Many health problems are a consequence of homelessness, including depression, anxiety, poor nutrition, feelings of shame and stigma, poor dental health, substance abuse and other mental health problems.⁸

The threat of more severe forms of homelessness can lead people to live in unsafe, unhealthy housing. *"We see people living in non-compliant housing or living with black mould since the floods of 2017, whose only other option is homelessness."* Neighbourhood Centre, regional NSW, 2020

Severe overcrowding has particular implications for First Nations communities with over a quarter of First Nations people living in overcrowded homes with a range of health and wellbeing impacts including more rapid transmission of infectious disease and psychological stress; and undue wear on important home infrastructure including food preparation areas, bathrooms, laundry facilities and sewerage systems.⁹

"Spiritual homelessness" - being disconnected from kinship networks, heritage, family and community can significantly affect First Nations people when they are not able to access housing on Country.¹⁰

Homelessness exacerbates and complicates the treatment of many health problems with less access to health services due to financial hardship; lack of transportation; lack of adequate identification or Medicare Card; and difficulty maintaining appointments or treatment regimes.

Some health problems can cause a person to become homeless as people with chronic physical or mental health issues are less able to find or maintain employment and keep a roof over their head. Studies show that people experiencing homelessness have higher rates of death, disability and chronic illness than the general population.¹¹

NCOSS endorses the submission from the Ageing on the Edge Forum and draws attention to the many case studies and comments from older people regarding their lived experience of homelessness presented in that submission. They effectively illustrate the many impacts of homelessness on older people, and in particular on older women.

Lack of Affordable Housing

The overwhelming issue for most people experiencing homelessness is a lack of affordable housing. As home ownership becomes increasingly unaffordable, nearly 4 out of 10 Australians now rent (up from 3 in 10 in the 1970s). Across Australia nearly half of low-income households in capital cities in the private rental market were in rental stress; and over a third in regional and rural areas. In NSW in 2020 one in eight low-income households in the Greater Sydney area were in housing stress across all types of housing tenure.¹²

The recent Anglicare Rental Affordability Snapshot¹³ identified that across Australia there were no rental properties affordable for single people on Job Seeker. Only .7% of rental properties were affordable for single people on the Age Pension; and 1.4% for couples on Job Seeker. For single people earning the minimum wage, only 1.6% of rental properties were affordable.

“The crisis in rental affordability has not crept up on Australians out of the blue... It has happened because governments have allowed it.” (Anglicare Australia 2022 p16)¹⁴

As private rental costs skyrocket investment in social housing declines. Investment by both federal and state governments has been declining over the last 3 decades with social housing now making up around 4% of all housing stock in NSW (compared with 6% in the early 1990s).¹⁵ In 2020 NSW had the fourth lowest proportion of social housing behind Western Australia, Tasmania, ACT and the Northern Territory.¹⁶

Multiple lockdowns during COVID-19 have highlighted overcrowding¹⁷ as a serious public health issue and key driver of homelessness in NSW.^{18,19} From 2011-2016, severe overcrowding increased by 74 per cent in NSW²⁰ and has driven dramatic increases in homelessness in Western and South Western Sydney²¹ – areas most heavily impacted by the June 2021 Delta outbreak.

Affordability and associated supply issues have been exacerbated by recent natural disasters across NSW including bushfires, pandemic and floods.

Family and Domestic Violence

The NSW Government's recent, significant commitment to expand the domestic and family violence 'Core and Cluster' model is welcome, bringing women's refuges into the 21st century. However, women still need a safe, secure home once they leave crisis accommodation. An estimated 2,402 women return to live with a violent partner because of lack of an affordable alternative, and a further 2,410 become homeless because they could not find secure and permanent housing after leaving violence.²²

Nearly a quarter of older people presenting to SHS are escaping domestic or family violence.

"I work with a number of older women who are faced with homelessness if they leave a situation with abusive family members. (Intersectionality of elder abuse usually perpetrated by adult children, history of DV, trauma history, isolation). The hopelessness of ever finding safe, affordable housing for older women means they feel forced to stay. This is unacceptable. They are also forced to enter aged care due to a lack of housing - again this is unacceptable." Community legal service, metropolitan NSW, 2020

Home Equity Schemes

Over the last three decades the proportion of 55 to 64 year home owners still paying off their mortgage increased from under 20% to over 45%, placing many older mortgagors in a precarious position as they are more exposed to ill health, unemployment, and marriage breakdown as they age. These challenges are exacerbated for older women.²³

With the recent change in federal government and a commitment to introduce a home equity scheme for home buyers, the opportunity presents itself to consider extending this scheme to older home owners, either at the state or federal level.

The existing federal Home Equity Access Scheme is only available for older home owners on the Age Pension. To complement this, low-income home owners close to retirement and facing changing circumstances could be supported to continue to live in their own homes, instead of having to sell up and face homelessness or a precarious existence in the private rental market. Likewise older people who have lost their homes through a relationship break down may have a small amount to put towards partial equity in purchasing a new home.

Investment in an integrated Housing System

The best early intervention to prevent homelessness is to establish a pipeline of affordable, safe, and secure homes to house people in. *"Rigorous research has shown that there is no single intervention more effective in ending homelessness"* (HomelessnessNSW 2022 p8)²⁴

NSW and Australia have waited too long – the need for strong political leadership from all levels of government and a considered evidence-based approaches to address our housing crisis is imperative.

We know what works in terms of partnerships, design, place-making and social inclusion, localised solutions, and scaling up.²⁵ The National Housing Finance and Investment Corporation (NHFIC), the National Affordable Housing Alliance (NAHA) and other housing bodies and not-for-profits have identified a number of innovative financial models and alternative funding streams to enable investment by governments and institutional investors.

Some examples include:

- Housing Capital Aggregator²⁶
- Re-prioritising existing development contributions for social and affordable housing²⁷
- Re-targeting subsidies for speculative housing investment to social and affordable housing
- Compulsory inclusionary zoning
- Tax incentives for build to rent institutional investors.

A National Housing and Homelessness Strategy is urgently needed to utilise all the levers, innovations, and policy settings available, along with significant funding to enable people experiencing poverty and disadvantage to access safe, secure, long-term housing through a rapid increase in social and affordable housing. With housing cost increases in some regional areas of up to 44% last year, and homelessness increasing in NSW by 37% from 2011 to 2016,²⁸ there are no longer any viable excuses for avoiding this.

It is imperative that the NSW Government uses its power to advocate for this; and is involved in its development in partnership with the Commonwealth. Previous economic analysis commissioned by NCOSS and NSW housing and homelessness peak bodies has demonstrated the economic benefits from investing in social and affordable housing. This includes stimulus to the residential construction sector, with an additional 5,000 social housing units per annum estimated to support 18,000 construction jobs across NSW, and provide flow-on benefits for 97,000 small to medium enterprises, providing a boost to the economy of \$4.5 billion.²⁹

The analysis also highlights the broader, long-term benefits due to improved housing security, health and economic participation. Further, the investment can be spread out across NSW, generating employment in regional economies and addressing the impacts of the recent devastating floods and continued housing issues for bushfire affected communities.

Developing a National Housing and Homelessness Strategy would also provide an opportunity to develop an integrated service system that brings together Specialist Homelessness Services with housing services and other agencies including Centrelink. Providing a number of benefits, this would also help to address the service accessibility gap for older people, noting that while 17% of all homeless people are over 55, only 9% of people accessing the SHS sector are over 55.³⁰

Recommendation 1

Advocate through the National Cabinet for the Federal Government to develop, in partnership with states and territories, a National Housing and Homelessness Strategy that enables:

- Building 5,000 additional units of social housing in NSW every year for the next 10 years.
- Upgrading existing social housing stock to protect against heat, cold, mould, and pollution; and reduce energy bills by improving energy efficiency.
- An increase of 50% in Commonwealth Rent Assistance to improve affordability for renters on low incomes.

Best Practice: Social and Affordable Housing for Older People at Brisbane Housing Company

Community Housing Providers (CHP) have a significant role to play in the provision of social and affordable housing for older people. Many are providing well thought out communities for older people using a variety of funding vehicles, tenure mix, and design approaches. Countless examples can be found across CHP websites and at conferences. The challenge of course is for governments to work with the sector to scale up the provision of this type of housing.

The Brisbane Housing Company is a registered Tier 1 Community Housing Provider with a range of affordable housing projects across the Brisbane metro area designed to provide suitable dwellings and communities for older people on low incomes. All of the complexes share certain features designed to provide a high level of amenity for older people including proximity to public transport and shops; larger units to allow for grandchildren and other family members to visit overnight; cross flow ventilation; and mixed communities with different types of tenure to allow for intergenerational connections. Rents for affordable units are set at 75% of market rates or 30% of income whichever is lowest. They also ensure a high level of safety and security, onsite property management to ensure grounds and building quality are maintained and are committed to practical, livable, and beautiful design that residents can be proud of.

They have also innovated a new financial model for retirement villages with their Arbor Sherwood village where older people are able to buy in with a small amount of equity and pay rent; buy in with a larger amount of equity and pay less rent; or pay upfront with no rent to pay.³¹

Challenges and support for older people experiencing homelessness

Challenges facing older people experiencing homelessness can look different to the general homeless population. Older people are less likely to have vulnerabilities in addition to their homelessness or risk of homelessness – more than half have no additional vulnerabilities. People with high or complex needs related to Alcohol and Other Drugs or mental health issues represent just a third of older people experiencing homelessness compared to nearly two thirds of the overall homeless population.³²

For older people 55 and over presenting to a SHS in 2020 – 2021:

- 51% had no additional vulnerabilities
- 24% were also experiencing Family or Domestic Violence (FDV)
- 31% were experiencing issues with Mental Health
- 6.5% issues with Alcohol and Other Drugs.³³

Risk Factors

When a lack of housing collides with changes in personal circumstances such as retirement, eviction, job loss, divorce or separation, domestic or family violence, ill health, trauma or injury, many are at risk of, or become homeless. For older people this is often in the context of “traditional housing histories” – they do not necessarily recognise their experience as homelessness and are unlikely to access homelessness services or consider that they need to. *“Instead, older people on low incomes live in precarious, untenable housing situations, with associated costs to their mental and physical health”.*³⁴

Poor Access to Social Housing for Older People

The NSW Government’s 2021-22 Intergenerational Report estimates that, under ‘business as usual’ settings, by 2060-61 an extra 68,000 households in the 65+ age group alone will require social housing or otherwise experience acute housing stress.³⁵ Yet, declining capital expenditure has resulted in social housing stock diminishing by almost 9,000 dwellings since 2014, while over 50,000 people sit on the wait list.³⁶

Older people in NSW who are eligible for social housing, but not for priority housing can face wait times of up to 10 years and more depending on the area³⁷. In NSW eligibility for older people for priority housing, who are not eligible for another priority category, is set at 80 years of age or 55 for First Nations people. An increase in social and affordable housing would provide the opportunity to lower the age for access to priority housing, and reduce priority wait times (often over 12 months)³⁸. Other states have different approaches to eligibility for priority housing with Victoria, for example, providing a special category for older people over 55.³⁹

Home at Last

Successful Specialist Homelessness Services for older people have been developed in Victoria - “the Home at Last” model - that provide housing information and support including both early intervention and crisis responses. This model includes peer educators to work with communities to raise awareness of housing options for older people, tailored housing information, assistance with housing applications, support for moving and establishing a new home, and referrals to aged care and other supports. *“Effective provision of information requires consideration of the stigma, shame and hidden nature of older people’s risk and experiences of homelessness.” (Ageing on the Edge 2021 p11)⁴⁰*

Housing First

There is a large evidence base on the efficacy of the housing first model for older people with high needs and additional vulnerabilities.⁴¹ Housing First programs provide a suitable long-term home and wraparound support to people experiencing homelessness - to ensure they are able to deal with the ongoing impacts of trauma, mental and physical health issues, and/or addiction, and attain the stability they need to maintain a tenancy and improve their quality of life.

The NSW Together Home program is due to have successfully housed 1050 rough sleepers by mid 2022. However it is likely that many of its clients will churn back into homelessness once the 24-month time frame for housing and support is up. NSW needs investment in programs that meet all the criteria for successful Housing First models including support and housing for as long as is needed.⁴²

While Housing First models and Home at Last services are important, neither will succeed unless housing supply issues are first addressed.

Best Practice: Housing First for First Nations people

Wongee Mia is a special initiative of Housing First project 50 Lives 50 Homes. The project was designed to house and support First Nations chronic rough sleepers in Perth. It was developed from small seed funding in consultation with First Nations staff at Ruah Community Services and with specialist First Nations organisations as there was an identified gap within the 50 Lives program for supporting First Nations people.

The program works with the client and their entire family. First Nations Elders provide information on relationships to consider when housing someone, preferred living arrangements, and guide and educate service providers towards culturally appropriate responses. In contrast to traditional one-to-one case management models, the Wongee Mia project takes a “family-centred approach”, whereby the total caseload is the whole family.⁴³

Increasing Demand

NSW's SHS sector serviced 70,400 people in 2019-2020. This represents 27% more people than it was funded to support. Unmet demand is high and many older people are unable to access services, or get the support they need.⁴⁴ In 2020-2021, 40% of older SHS clients needed long-term accommodation. Less than 7% of these clients were provided with it.⁴⁵

From previous NCOSS consultations with service providers a common refrain has been that the need for emergency and transitional accommodation is far greater than availability as people are not able to move to permanent housing. This results in them cycling back through homelessness, refuges and other unsatisfactory arrangements. We heard in one region that caseloads for Specialist Homelessness Services are triple that for which they are funded; but that funding levels have been the same for four years, putting more pressure on staff and ramping up caseloads.

Administrative Burdens for Services

NCOSS has just released new research [*The High Cost of Doing Business – administrative and management overload for smaller NGOs*](#) undertaken in conjunction with Ask Insight. It highlights the increasingly complex operating environment for small to medium-sized NGOs and the growing administrative burden they bear, exacerbated by COVID and other disasters. It explores the impact of multiple funding agreements, inadequate recognition of back-office costs in funding specifications, growing compliance requirements, the multitude of different definitions, templates and portals that organisations grapple with, and the 'discontinuity' costs associated with short term grants.

Increased Support for SHS

The contribution of the SHS sector needs to be recognised and backed by an evidence-based, data-informed funding model that is linked to population growth, demand indicators, economic and workforce conditions and the real cost of service provision.

In the meantime, a boost of 20 per cent to recurrent baseline funding would enable the sector to manage increased costs and risks incurred due to:

- rising demand and cost of service provision
- increased data collection and reporting requirements by funding agencies
- increased responsibility in the level, type, complexity and location of service deliverables
- more onerous contract terms with no guarantee of annual indexation or growth funding.

Adequate baseline funding is imperative to support ongoing sustainability and the real, efficient costs involved in the delivery of specialised services to vulnerable groups.

Permanently increasing recurrent baseline funding will also strengthen ACCO's in their provision of culturally-safe, community-led support for First Nations Australians, who continue to experience disproportionate levels of disadvantage and homelessness.

The critical role that NGOs play in times of emergencies needs to be recognised and formally built into our emergency management system, including in the planning and preparation phases. This responsibility should also be reflected in service contracts, and a mechanism to enable compensation for funds spent during an emergency situation included.

Recommendation 2

Make immediate improvements to social housing and homelessness services for older people through:

- Lowering the age for priority housing from 80 years of age.
- Introducing older persons housing services similar to Home at Last.
- Expanding Housing First programs to eliminate rough sleeping by 2030.
- Integrating Specialist Homelessness Services with the broader housing system.
- Increasing funding for Specialist Homelessness Services by 20% and providing contract certainty of at least 5 years.
- Taking action to reduce red tape, streamline reporting requirements and ease the administrative burden for NGO's providing essential frontlines services.

Addressing the Impacts of Climate Change

Bushfires, floods and COVID-19 have thrown into stark relief the need for more social and affordable housing in regional areas to address homelessness from natural disasters and their economic impacts. Across Australia planning systems need to adapt and change to ensure that housing adequately addresses the likelihood of increased temperatures, bushfires, and extreme weather events such as floods and cyclones. Emergency management systems need urgent revision to include place based local NGO's, who were left out of the mix in the recent floods response in NSW.

Embedding NGOs in Emergency Management Systems

Previous experience from the 2017 Lismore floods and Black Summer bushfires raised concerns that NSW Government recovery agencies failed to engage early enough with community housing providers (CHPs) and SHS's around immediate housing needs, and this remains an ongoing issue with subsequent disasters, including the 2022 floods.

As has been demonstrated in these disasters, local NGOs play a critical role in disaster response and recovery. They are key local assets that are trusted by their communities and, in particular, the vulnerable population groups that they support.

The emergency management system in NSW is governed by the State Emergency and Rescue Management Act (1989) and set out in the NSW State Emergency Management Plan (EMPLAN). But neither the EMPLAN, nor the Welfare Services Functional Area (WSFA) Supporting Plan, recognise or include the non-government sector as Participating Organisations or Supporting Organisations in the emergency response (other than a limited number of large NGOs contracted to provide specific disaster-related services for an identified period). As such NGOs are not represented on the various committees that play key roles in the emergency management system at a state, regional and local level.

The WSFA Supporting Plan, in acknowledging that the delivery of welfare services occurs with the assistance of the non-government sector, categorises NGOs as 'Other Stakeholders', and ascribes to Local Government a coordinating role that is 'crucial to establishing and maintaining community service organisations' networks that can be accessed following the impact of a disaster'.⁴⁶

Organisations have reported significant variation in the involvement of relevant authorities. In some areas, local government's involvement has been strong, while in other areas the Council appears to lack the capacity to deal with disasters, despite having a key role in each LGA's local emergency management plan and (erroneously) being identified in the relevant supporting plan as playing a coordinating role with community service organisations.

In order to fill this gap, NCOSS has recently convened the Northern Rivers Floods Working Party. This group is comprised of up to 20 local community service and health NGOs who support vulnerable and disadvantaged groups across the breadth of the Northern Rivers region. It's members include neighbourhood centres, Aboriginal community-controlled organisations (ACCO's), homelessness services, community housing providers and services providing domestic violence, disability, aged care, youth and family support. These organisations have been at the frontline responding to the recent crisis to ensure the safety and wellbeing of those most at risk.

Harnessing the respective strengths of local NGOs, community groups and grass-roots initiatives, coordinating efforts from the outset, and embedding them in the emergency management system would ensure a more consistent and effective response when disaster hits.

Further details can be found in our recent submission [*NSW Independent Flood Inquiry NCOSS Submission 20 May 2022.*](#)

Impacts on Housing

Before the devastating floods earlier this year, families in northern coastal areas of NSW were already being forced to live in tents, cars and other makeshift arrangements because there was simply nowhere affordable or available for them to live. Many households are still affected by previous floods and bushfires in the region, living in overcrowded or substandard conditions with significant health, safety and well-being impacts. This includes Aboriginal families and communities who were already disproportionately impacted by disadvantage.

Over 7,000 properties in the Northern Rivers were affected by the recent floods and over half of those have been classed as uninhabitable. This means that thousands of people continue to be in acute housing stress. We know that it may take many months for people to return to their homes. In the meantime many people are homeless, living in temporary accommodation provided by government, or with family and friends, or rooms such as repurposed garages, provided by community members.

“Many of my colleagues are living in their cars with COVID right now”

Family services provider, Northern Rivers area 2022

Community housing and homelessness services in the Northern Rivers area continue to be very concerned about the future for their tenants and clients, and their ability to provide adequate shelter and support. They have told NCOSS that there is a dire shortage of accommodation in the region to re-house people. The establishment of temporary housing in “villages” is happening slowly and by early June only 11 families had been housed.

Services were straining at the seams before the floods, and will not be able to meet the increased level of demand that will exist in the community for years to come. For example, NCOSS has been told that while the Northern Rivers is home to 30% of the state’s rough sleepers, it receives only 6% of funding for Specialist Homelessness Services. This problem will only exacerbate as levels of homelessness continue to rise in the face of the ongoing housing crisis, made worse by the floods.

Case Study: Older women in Regional NSW

“For older women on a fixed income in the Lismore area there is just no affordable housing available. It’s either social housing or homelessness and the wait for housing in the Tweed is 15 years. Older women are being forced into unsuitable housing such as converted pubs with shared bathrooms and kitchens. It’s not safe, it’s not ok, and it’s not affordable.

All the housing up here is skewed to women with children – there is no appropriate housing for older women (smaller one or two bedroom units) – just houses. There is no housing up here for older people

unless you have been flood impacted in which case you might get a pod, and that's happening really, really, slowly. People are living in unsafe environments because there's nowhere else to go. There's massive overcrowding and First Nations communities are really struggling. Many of the homelessness workers are homeless. People are living in the mouldy rotting husks of their houses. The community has been great (offering up spare rooms and garages) but you can only live with strangers for so long.

Homeless women who were at the end of the queue and who couldn't list an address in a flood impacted area are not even in the queue any more. We are helping older women leave the area - to go to Newcastle, Armidale, Brisbane – anywhere they might have friends or family where they can couch surf. It's really hard for older women with mobility issues.

We can't get tradies in to rebuild services and housing; there's a labour shortage and there's nowhere for them to stay anyway. LAHC hasn't done any maintenance up here for years so even people with social housing on higher ground are living in mouldy rotting houses as they haven't been maintained. And it's getting worse as its getting colder and still raining. It's heartbreaking. I know older women that are just walking around in a cloud. They are really not mentally well.”

Homelessness Service, regional NSW 2022

Recommendation 3

Embed place-based NGOs in emergency management systems to improve local emergency planning, responses, and recovery, including the provision of adequate housing.

Recommendation 4

Tackle the housing crisis across the Northern Rivers, by undertaking a rapid ‘Social Housing Repair, Rebuild and Construct’ program in collaboration with Community Housing Providers (CHPs), and guided by an overarching Masterplan to ensure resilience to future disasters, that:

- Fast-tracks the repair and rebuild of existing social housing in the right locations.
- Makes recovery grants immediately available to local community housing, Aboriginal and homelessness services to support people, including older people made homeless as a result of the floods.
- Involves comprehensive, immediate planning of sufficient temporary housing villages in consultation with CHPs and other relevant NGOs that incorporates access to appropriate support services and relevant initiatives to build cohesion and mitigate the potential to exacerbate trauma and poor outcomes for impacted families and households.
- Invests in sufficient, additional social and affordable housing to address the already critical shortage in the region, made worse by the recent disaster.

Ongoing impacts of dispossession and disadvantage

First Nations people have much lower home ownership rates than the general population – 31% in comparison to over 60%. 34% of First Nations people in Australia rely on social housing.⁴⁷ 25% live in overcrowded homes.⁴⁸ 6 per cent of homeless people in NSW are First Nations people - nearly twice the rate of the general homeless population.⁴⁹

The Closing the Gap Agreement prioritises shared decision making and growing the First Nations community-controlled sector. It commits the NSW government to reach a target of reducing the rate of overcrowded housing to 12% by 2031.

A lack of quality housing for First Nations communities in regional NSW is a longstanding issue that needs to be addressed. Recent investment in new and upgraded social and affordable homes in partnership with Aboriginal Community Housing Providers is a positive step. But more is urgently required to address chronic undersupply, protect vulnerable communities from the ravages of climate change, and meet the Closing the Gap target.

Studies show that much of the housing in remote First Nations communities in NSW will become uninhabitable by 2050 due to current substandard housing quality and rising temperatures. *“Current regional and remote Indigenous housing stock is unable to provide consistently healthy and comfortable indoor environments. There seems to be an unstated assumption that what is practically sustainable for governments and housing providers is the undersupply of substandard housing serviced by inconsistent repairs and maintenance.”* (Lea et al 2021 p 2)⁵⁰

Substandard housing has a number of health and wellbeing impacts on older First Nations people and their families including psychological duress, skin infections, poor educational outcomes, faster transmission of infectious diseases, and poor nutrition due to inadequate food preparation and kitchen facilities. Access to safe and healthy housing is related to the staggering rates of First Nations children in out of home care⁵¹ (SNAICC 2021 p.5) As at 30 June 2020 one in every 16 First Nations children were in out of home care. Without good quality housing for all First Nations peoples, children will continue to be removed from their families, older First Nations people will struggle to step in as kinship carers, and a new stolen generation of First Nations people will be traumatised; and more at risk of poverty and homelessness.

We know crises impact already vulnerable communities even harder. First Nations peaks and organisations have been working overtime to address the impacts of various climate crises and natural disasters on their communities including bushfires, floods, and the pandemic. Yet there are very few First Nations community controlled SHS providers. In 2017 in NSW, there were just four.⁵²

"I do my grant applications at one in the morning"

Manager, Flood impacted First Nations community controlled organisation, regional NSW 2022

Case Study: First Nations Home Owner

"I bought my house 5.5 years ago in late 2016 before the housing boom – I knew it was on a flood plain but it was all I could afford (I still have a mortgage on it). I really wanted some security for my daughter and I after a separation. Our friends and family were here, her school, my work, it's our community.

In early 2017 there was a major flood and we had roughly half a foot through the house. it took me nearly 2 years to make it habitable again and all that time I was renting locally – I was able to get it fixed because I was insured. I also received a partial grant to have it raised above the 1 in 100 year flood level, the floor was lifted to 4m off the ground. My house was then the Council's model of flood safety.

After that time I was unable to afford insurance, the cheapest quote back then was \$8,500 and as a low income earner there was no way I could afford that. In February this year we were hit by the biggest flood our town had ever seen. My home was again inundated and I had 1.25m of water through it and it was once again unliveable.

I've been staying in a converted garage paying \$350 pw rent and my home is a stripped out shell. But when the rent assistance money is spent at the end of June I'll have to move back into my house as I am still paying my mortgage and can't afford both. The only other alternative is a pod in the middle of an oval in another town – a little village of people I don't know who are all probably traumatised, as am I. I really don't want to be put in that situation, for myself or my daughter.

So home it is. I've got a whole lot of corflutes and old hospital blankets that I'm stapling to the bedroom and hall walls. I have a working fireplace and had a new kitchen installed so I'm hoping to be ok through winter – a lot of people are worse off than me.

But this is not what I envisaged for my life at 52, living in my home like it's a squat, no internal working power points, no real walls or bathroom vanity.

I feel really traumatised, like it's not safe in that house anymore. We thought water was never going to go in there after we raised it, it was a false sense of security and I know that now. Every time it rains it's anxiety provoking. I don't want to put furniture in the house, I don't want to own anything or make it into a proper home – it doesn't feel like one anymore. So I'm just doing a make safe, make shift job for now until I hear what comes from the Reconstruction Corporation and the Council.

Life is always uncertain isn't it. We don't think about it though, taking things for granted because we feel safe or can't imagine certain things or outcomes. Now though, everything feels uncertain ... that feeling is there all the time. I don't know what the future holds anymore."

Jo - First Nations woman and home owner, Lismore

Recommendation 5

In keeping with the Closing the Gap Agreement, partner with the NSW Aboriginal Land Council, the network of Local Aboriginal Land Councils, ACHIA, Aboriginal community-controlled housing providers and Specialist Homelessness Services to improve housing outcomes for first Nations people in NSW by:

- Supporting the growth of the Aboriginal controlled community housing and homelessness sectors.
- Increasing funding for existing Aboriginal community-controlled services by at least 20%.
- Significantly increasing Aboriginal community-controlled and culturally-appropriate housing to address overcrowding and homelessness from natural disasters.
- Creating opportunities for Aboriginal people to participate in the service delivery, design, management and governance of social and affordable housing in our state.

Best Practice: Aboriginal Elders Independent Living Village

With First Nations people being overrepresented in the homelessness statistics in NSW, and a rate of homelessness for Aboriginal women of one in 28 people, solutions for culturally-appropriate housing by and for First Nations people are essential.

In South Australia the Aboriginal Community Housing Limited (ACHL) has partnered with the Kurna Yerta Aboriginal Corporation (KYAC), the South Australian Housing Authority, and the Indigenous Land and Sea Corporation to invest in a \$10m dollar Aboriginal Elders Independent Living Village to house 40 elders from the Kurna Yerta community.

The village has been designed with community stakeholders as a walking village with units connected to each other by walking paths and landscaping - highlighting the natural flora and fauna of village surrounds. It is designed with opportunities for connections with 2-4 units around a central courtyard and communal spaces for large and small gatherings, including a fire pit.

Plantings in the village will engage local volunteers from the Kurna community who will be involved in keeping connection to country. Aboriginal businesses and organisations will be engaged to provide

services to the village including ongoing tenancy support. ACHL is committed to assisting Elders to maintain connections to community, family, and key essential services.

“The cultural safety of our Elders and their wellbeing is our highest priority and is well supported by the tailor-made design on land of cultural significance to the Kurna people. It is with tears of joy that KYAC will see Elders well cared for into the future.” Geoffrey Newchurch, Chair of KYAC (Aboriginal Community Housing Ltd 2021 p3) ⁵³

Precarious Housing in the Private Rental Market

Home ownership rates for older people nearing retirement have been gradually declining over the last 20 years with a nearly 7 per cent drop in the 50 to 54 age group.⁵⁴ Renting in the private rental market is simply not affordable for older people on income support or low wages.⁵⁵ This especially impacts older women who have less superannuation and less savings due to caring responsibilities, low wages in female dominated industries, and the gender pay gap.

As well as being unaffordable the private rental market continues to punish renters who face insecure, unstable tenancies – over 80% of renters in NSW have lived in their current rental for less than 5 years, with a third for less than one year. 20-30% of renters move due to an eviction, around a quarter of which are due to ‘no fault’ termination for ‘no grounds’ evictions. Older people are more likely to face eviction, along with cohorts such as people on income support, single parents, and people with disability or chronic ill-health.⁵⁶

With an estimated average cost of moving for renters of \$3,500, eviction can be a significant driver of poverty and homelessness. *“Many low-income renting households are not able to raise the relatively large sum of money required to secure alternative housing and move at short notice.”* (Tenants Union 2021 p 45)⁵⁷

Make Renting Fair

Urgent reform is needed in NSW to address the inadequacies in the Residential Tenancies Act and make renting a viable, long term housing option. There are a number of possible options for reform presented in the Tenants Union 2022 report [Eviction, Hardship, and The Housing Crisis](#) providing long term change to improve housing outcomes for the nearly 4 in 10 people in NSW who are renters.

Immediate improvements should be made by ensuring renters have legislative protection against unfair evictions by amending the Residential Tenancies Act 2010 to include a list of reasonable grounds and protections against the false use of eviction grounds, noting as previously mentioned, that older people are one of the cohorts more vulnerable to eviction.

In addition mental and physical health impacts of unsuitable housing need to be urgently addressed with improved minimum standards set in rental housing for health, safety and energy efficiency to protect against heat, cold, pollution and mould; as well as reducing energy bills.

Diverse Housing Choices

In *Housing 2041* the NSW government outlines a vision for “Homes in NSW (that) are accessible and suitable for different stages in life”.⁵⁸ The 2022 Action Plan includes the action to “Prepare new universal design guidance to ensure NSW Government takes the lead, delivering best practice universal design in new and upgraded housing stock.”⁵⁹ It is surprising then that the NSW government has not implemented the minimum accessibility standards adopted in the revised National Construction Code.

These standards provide for simple changes for new builds and significant reconstructions that would make it easier and cheaper for older people to remain in their own homes as their mobility declines; or have more housing choice in the private market as they seek to downsize. In addition the standards would give more choice to people with a disability in the housing market including private renters and home buyers.

It is estimated that over time, as the building industry becomes familiar with the revised standards, costs of implementation will significantly reduce, with upfront costs for new builds built to the standards significantly cheaper than for retrofitting existing homes.

Recommendation 6

Make renting a viable, long-term option by:

- Ensuring renters have legislative protection against unfair evictions by amending the Residential Tenancies Act 2010 to include a list of reasonable grounds and protections against the false use of eviction grounds.
- Setting minimum standards in rental housing for health, safety and energy efficiency to protect against heat, cold, mould, and pollution; and reduce energy bills by improving energy efficiency.
- Mandating minimum accessibility standards (Silver Level Livable Design) in NSW building regulation.

We would very much welcome the opportunity to discuss the recommendations and submission with you in greater depth. Should you have any questions in relation to this matter, please do not hesitate to contact A/Director Policy and Research

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