

Supplementary
Submission
No 28a

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

Organisation: NSW Ageing on the Edge Coalition

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Supplementary submission to inquiry into homelessness among older people aged over 55 in NSW

This submission is approved by Ageing on the Edge NSW Coordination Group member organisations:



Additional information on Home at Last service

Home at Last service started as a pilot project in Victoria in 2012 and was funded via the Department of Human Services Homelessness Innovation Action Projects (IAPs). IAPs were initiatives established to trial new methods of service delivery in the homelessness sector. The IAPs were evaluated by KPMG in 2015.¹ The Home at Last pilot demonstrated positive housing outcomes for older people and the benefits of a preventative response to homelessness for this cohort.

The KPMG IAP evaluation prompted the provision of recurrent funding by the Victorian Department of Human Services (now Department of Families, Fairness and Housing (DFFH)) for the Home at Last service, which has been operating as a state-wide information and housing support service since. The service is co-funded by the DFFH, Consumer Affairs Victoria, and the Assistance with Care and Housing sub-program of the Commonwealth Home Support Program (CHSP).

Below table has a breakdown of the number of people supported by the Home at Last service and the main reasons for seeking support.

The definitions of the categories/causes are identified by Australian Institute of Health and Welfare (AIHW).¹

Year	Number of older people provided with information and referrals	Number of older people housed in long-term housing	Top three causes/reasons for seeking support
2014-2015	1,142	146 ²	<ul style="list-style-type: none"> • Inadequate or inappropriate dwelling conditions. • Financial difficulties. • Housing affordability stress.
2015-2016	1,010	159 ³	<ul style="list-style-type: none"> • Inadequate or inappropriate dwelling conditions. • Financial difficulties. • Housing crisis.
2016-2017	1,179	109 ⁴	<ul style="list-style-type: none"> • Inadequate or inappropriate dwelling conditions. • Financial difficulties. • Housing affordability stress.

¹ Australian Institute of Health and Welfare, SHS data definitions, accessible at: <https://www.aihw.gov.au/about-our-data/our-data-collections/specialist-homelessness-services/shs-data-definitions>

² Housing for the Aged Action Group, Annual Report 2014-15, pp 14, accessible at: https://www.olderrenters.org.au/sites/default/files/pictures/2015_annual_report_for_web.pdf

³ Housing for the Aged Action Group, Annual Report 2015-16, pp 16 and 20, accessible at: https://www.olderrenters.org.au/sites/default/files/annual_report_2015-2016.pdf

⁴ Housing for the Aged Action Group, Annual Report 2016-17, pp 21, accessible at: https://www.olderrenters.org.au/sites/default/files/annual_report_2016-2017_final_for_web.pdf

2017-2018	1,081	130 ⁵	<ul style="list-style-type: none"> • Financial difficulties. • Housing affordability stress. • Housing crisis.
2018-2019	1,091	163 ⁶	<ul style="list-style-type: none"> • Housing affordability stress. • Financial difficulties. • Inadequate or inappropriate dwelling conditions.
2019-2020	973	160 ⁷	<ul style="list-style-type: none"> • Financial difficulties. • Housing affordability stress. • Inadequate or inappropriate dwelling conditions.
2020-2021	955	156 ⁸	<ul style="list-style-type: none"> • Financial difficulties. • Housing affordability stress. • Inadequate or inappropriate dwelling conditions.

This demonstrates that from HAAG’s service experience, the key reasons for seeking support consistently relate to systemic issues such as inadequate income and housing suitability across a number of years.

Critical need to lower priority age

As demonstrated in the Ageing on the Edge NSW main submission to this inquiry, the priority age requirement results in older people in critical need of social housing not being eligible for housing despite experiencing homelessness.

One of the key arguments against lowering the priority age is that applications are assessed on an individual basis as social housing is a significantly limited resource. However, this should not be a justification for marginalising a cohort that are already experiencing mounting challenges to accessing housing supports and services that are too complex and largely online. The costs, mental and physical impact of having to move regularly is much more severe for older people, particularly older women.

Research found that the number of applicants for social housing over 55 years of age is similar in Queensland (17%) and Tasmania (19%), but substantially higher in NSW (31%).⁹ This could be a reflection of poorly targeted eligibility criteria for people over 55 in NSW. In addition, the total number of waitees in NSW declined by 7% between 2011-12 and 2019-20, despite increases in rental

⁵ Housing for the Aged Action Group, Annual Report 2017-18, pp 7, accessible at: <https://www.olderrenters.org.au/sites/default/files/2017-2018-annual-report-web.pdf>

⁶ Housing for the Aged Action Group, Annual Report 2018-19, pp 7-8, accessible at: https://www.olderrenters.org.au/sites/default/files/annual_report_2018-19-web.pdf

⁷ Housing for the Aged Action Group, Annual Report 2019-20, accessible at: https://www.olderrenters.org.au/sites/default/files/annual_report_2019-20_web.pdf

⁸ Housing for the Aged Action Group, Annual Report 2020-21, pp 5-7, accessible at: <https://www.olderrenters.org.au/publications/annual-report-2020-21>

⁹ H. Pawson and D. Lilley, Managing Access to Social Housing in Australia: Unpacking policy frameworks and service provision outcomes; 2022, accessible at: https://cityfutures.adu.unsw.edu.au/documents/689/Waitthood_final.pdf

stress and homelessness and the failure of social housing stock numbers to keep pace with population growth. This may be attributable to applicants giving up on waiting, or being discouraged from applying, due to the prospect of long waits and/or the stigma associated with an inadequately maintained social housing portfolio. It could also reflect more rigorous waiting list management – e.g. more pro-active procedures to delete registrations.¹⁰

In discussing the priority age category, the Department of Communities and Justice website states ‘the social housing sector acknowledges the special needs of elderly clients and their households, and the need to deliver services that are culturally appropriate’.¹¹ However, the NSW Government submission to this inquiry also highlight that ‘applicants eligible under this group (Housing Elderly Persons priority group) are prioritised for housing *after* [emphasis added] people approved for emergency and temporary accommodation, people approved for priority housing and, current tenants requiring transfers.’¹² As demonstrated in the NSW Ageing on the Edge Forum’s main submission to this inquiry, older people are much less likely to access emergency and temporary accommodation, meet other priority criteria or already be in social housing properties to request transfers.

Furthermore, documentation requirements associated with evidencing a claim for priority status can pose a major challenge for applicant households. This will tend to place a premium on an applicant’s ability to secure assistance from an advocate or support worker who has experience navigating the system and its requirements.¹³ Many older people who have not had any previous interactions with the service systems may not know how to find assistance from advocates or support workers or in some instances may not approach them due to stigma and shame.

Government policies should be agile and adaptable to meet the changing conditions. It is unclear when the 80 year priority criteria was introduced in NSW. Given the relatively recent research revealing older women are the fastest growing cohort and the housing crisis in NSW disproportionately impacting older people, it is imperative that the NSW government policies reflect the insurmountable housing challenges older people experience.

The majority of older people, especially older women who are at risk of or experiencing homelessness are likely to have reached their earning and saving capacity as they reach 50 years and over, due to age and gender discrimination in employment, policy failures to protect their financial interests and working in low paid, and highly insecure and casualised sectors. Although unemployment rates are declining, older people are unlikely to reengage in full-time or part-time employment if they have been made redundant or lost work as a result of the pandemic. Research

¹⁰ H. Pawson and D. Lilley, *Managing Access to Social Housing in Australia: Unpacking policy frameworks and service provision outcomes*; 2022, accessible at:

https://cityfutures.adu.unsw.edu.au/documents/689/Waithood_final.pdf

¹¹ Department of Communities and Justice, *Social Housing Eligibility and Allocations Policy Supplement*, accessible at: <https://www.facs.nsw.gov.au/housing/policies/social-housing-eligibility-allocations-policy-supplement/chapters/entitlements#:~:text=Clients%20who%20have%20met%20the,aged%2055%20years%20and%20over.>

¹² NSW Government, *Submission 87, Inquiry into Homelessness Amongst Older People Aged Over 55 in New South Wales*, pp 18, accessible at:

<https://www.parliament.nsw.gov.au/lcdocs/submissions/79062/0087%20NSW%20Government.pdf>

¹³ H. Pawson and D. Lilley, *Managing Access to Social Housing in Australia: Unpacking policy frameworks and service provision outcomes*; 2022, accessible at:

https://cityfutures.adu.unsw.edu.au/documents/689/Waithood_final.pdf

found that older retrenched women were more likely to both experience unemployment and dropping out of the labour force.¹⁴

As highlighted in a number of submissions, income support payments are significantly inadequate to meet expenses. Of 228,523 people in receipt of JobSeeker in NSW, the largest proportion of 79,286 recipients were over 55 years, representing 34.7% of all NSW jobseeker recipients.¹⁵ This, coupled with challenges to find employment mean that older people are worst affected by housing crisis with no affordable and safe housing alternatives.

As people age, their health gradually deteriorates and experiencing homelessness adds further strain on their health. Ageing in place is a key priority highlighted in NSW Ageing Strategy and in order to receive government funded supports such as Aged Care services or National Disability Insurance Scheme (NDIS) services, older people need a stable home.

Victoria acknowledged these challenges for older people in 2017 by lowering the age to 55 years.¹⁶ This did not negate the other challenges people were experiencing in terms of their housing as domestic and family violence, homelessness, mental health and other priority factors are considered as part of all the housing applications.

Lowering the priority age in NSW would be an acknowledgement of these challenges to ensure older people have equitable access to priority housing.

Together Home Program

Together Home program provides vital support to people experiencing homelessness through the proven housing first model. For the period of 2020-21, 449 together home packages were allocated to males and 182 were allocated to females. Of these 182 females, 41 were women between 50-68 years.¹⁷ This demonstrates that this program is less likely to meet the needs of older women.

Together Home program is a critical service response and should be expanded to meet the growing need for housing first responses for people experiencing homelessness. As the fastest growing cohort experiencing homelessness, it is critical that these programs are better targeted to include older women experiencing homelessness but are unlikely to be accessing mainstream housing services.

Meanwhile housing or meanwhile use

Ageing on the Edge Forum made a submission to the NSW Parliamentary inquiry into *Options to improve access to existing and alternate accommodation to address the NSW social housing*

¹⁴ Australian Research Council - Centre for Excellence in Population Ageing Research, Tapping into Australia's ageing workforce: Insights from recent research, 2021, p 14, accessible at:

<https://cepar.edu.au/sites/default/files/cepar-research-brief-ageing-workforce-australia.pdf>

¹⁵ Department of Social Services Payment Demographic Data, March 2022, accessible at:

<https://data.gov.au/dataset/ds-dga-cff2ae8a-55e4-47db-a66d-e177fe0ac6a0/distribution/dist-dga-b67aa3d6-063a-4e55-8941-6ca291754523/details?q=>

¹⁶ Victorian Government, Special housing needs aged 55 years and over, accessible at:

<https://fac.dffh.vic.gov.au/special-housing-needs-aged-55-years-and-over>

¹⁷ NSW Budget Estimates, Responses to Questions on Notice, 29 October 2021, accessible at:

<https://www.parliament.nsw.gov.au/committees/Pages/Budget-Estimates-2022.aspx>

shortage in 2021.¹⁸ This submission highlighted that while meanwhile housing options form part of a suite of housing solutions given the absolute critical housing crisis in NSW, it is not an appropriate housing option for many older people who are in need of long-term, safe and affordable housing. We echo the comments made by Shelter NSW in their supplementary submission and highlight that what is in critical need is investment in social and affordable housing from the government.

Next iteration of the NSW Homelessness Strategy

The current NSW Homelessness Strategy 2018-2023 (the Strategy) recognises older people as one of nine key categories of cohorts and identifies older women as those aged over 55 years. It also defines older women as those over 55 years. There are a number of action areas that focus on the housing needs of older women in particular. However, the commitments of units that will be delivered are not publicly available as part of the Homelessness Strategy.

The Audit Office of NSW report on Responses to Homelessness in 2021 contains some data in relation to the undertakings under the Strategy. According to the Audit Office report, Phase 2 of the Social and Affordable Housing Fund to target 1,200 new social and affordable dwellings with a focus on older women. It is unclear how many of these units are ringfenced for different cohorts. In addition, Appendix two of the report – Actions within the NSW Homelessness Strategy 2018–23, action area ‘Specialist housing for older people’, the government was expected to trial 97 smaller units for older women. This investment is close to 1% of the current number of single women over 55 years in the NSW waiting list, well below the required level of investment to meaningfully address the issue of older women experiencing homelessness.

The NSW Homelessness Strategy provides an opportunity to meaningfully address the housing issues of older people with tangible actions and deliverables. Therefore, it is imperative that the NSW government adopts the outcomes of this inquiry when developing the next iteration of the Strategy.

Collaboration and coordination between and across different departments

A critical part of addressing homelessness is increased social and affordable housing stock. In NSW, the Department of Planning and Environment has the carriage of increasing social housing stock and the assignment of properties lie with Department of Communities and Justice. NSW Land and Housing Corporation (LaHC) that sits under Department of Planning and Environment has the responsibility to actively grow and manage the supply of the right types of housing.¹⁹ There needs to be better coordination between the two departments, especially in relation to assignment of stock, increasing transparency and accountability.

¹⁸ NSW Ageing on the Edge Forum, Options to improve access to existing and alternate accommodation to address the NSW social housing shortage, 2021, accessible at:

<https://www.olderrenters.org.au/publications/options-improve-access-existing-and-alternate-accommodation-address-the-nsw-social>

¹⁹ NSW Land and Housing Corporation (LaHC), accessible at: <https://www.dpie.nsw.gov.au/land-and-housing-corporation/social-housing>