

**MISSION
AUSTRALIA**

Submission

Response to the Homes
NSW Discussion paper
to inform the Homes
for NSW Plan

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Overview

Mission Australia welcomes Homes NSW providing stakeholders the opportunity to influence its direction setting for the next ten years. Overall, we find the *Homes NSW Discussion paper to inform the Homes for NSW Plan* (Discussion Paper) has accurately identified the key areas for change in the non-market housing system and points to a substantive agenda to address it. However, as with most government reforms, strategies and plans, its success is dependent on having secured the necessary resources, funding and embedded accountability to achieve the intended outcomes.

Our response is structured according to the questions contained in the Discussion Paper and informed by a combination of research and insights from our housing and service provision and policy advocacy.

Mission Australia is an organisation dedicated to ending homelessness and ensuring that people and communities in need can thrive. We deliver over 460 programs and services across Australia, in many areas including homelessness, housing, strengthening communities, children and families, youth, employment and disability. Mission Australia Housing is a Registered Tier 1 Community Housing Provider and owns or manages more than 4,500 social and affordable homes. In NSW we have 58 housing and homelessness programs and services and almost 3,000 social and affordable homes in our portfolio.

Response to questions

1. Does the vision that 'Everyone has access to a decent home and support if they need it' provide an appropriate system-wide purpose and direction for all providers to work towards over the next 10 years?

The vision for Homes NSW which is adopted needs specificity, clarity, and accountability to be useful to those who are expected to contribute to it. Currently, it might be seen as just about 'access' without considering what is accessed or its quality. The term 'decent homes' suggests a standard but lacks clarity on who determines this—the intended beneficiary, Homes NSW, the provider, or another entity.

Instead, you could consider an alternative vision that reflects the aims of the three priority areas for action in the Discussion Paper. Mission Australia agrees these priority areas are the right ones to focus on. An example of this could be:

“Everyone in NSW has a home and support to avoid homelessness, for as long as they want and need it, through access to a service system that is appropriately resourced, easy to use and responsive to people’s needs”

This version is intended to communicate that:

- what is delivered is customer-driven not agency/provider-driven;
- individuals/households have the offer of a home and support to avoid becoming homeless because the service system is purposefully built to deliver this;
- these offers are for as long as needed and wanted, because some people need one and/or the other for a short period while they resolve a crisis, while for others the need is ongoing;
- requesting and receiving help is easy for the individual/household;
- the homes and support are closely aligned to what the individual/household needs.






2. Are these the right priorities to achieve the vision?

The priorities are the right ones to focus on as they broadly cover:

- empowerment of the intended beneficiary (i.e. individual/household);
- appropriateness of the product(s) being offered (i.e. homes and/or support);
- the way the beneficiary accesses and receives that product (i.e. the service system).

3. What does great engagement with tenants and communities look like?

Choosing the right engagement method depends on the situation, resources, and target group. The IAP2 Public Participation Spectrum is useful for this purpose, helping to decide the public’s role in participation processes. We use this at Mission Australia to identify suitable levels of engagement and the diagram below provides examples of how we do this. For significant issues affecting tenants and communities, Homes NSW should aim for approaches closer to the right side of the spectrum.

	 INFORM	 CONSULT	 INVOLVE	 COLLABORATE	 EMPOWER
Goal	To provide balanced and objective information in a timely manner.	To obtain feedback on analysis, issues, alternatives and decisions.	To work with the public to make sure that concerns and aspirations are considered and understood.	To partner with the public in each aspect of the decision-making.	To place final decision-making in the hands of the public.
Promise	"We will keep you informed."	"We will listen to and acknowledge your concerns."	"We will work with you to ensure your concerns and aspirations are directly reflected in the decisions made."	"We will look to you for advice and innovation and incorporate this in decisions as much as possible."	"We will implement what you decide."
Mission Australia's Commitment to Clients	We will keep you informed in a timely manner and in a way that reflects your situation, including considering cultural, language or mobility issues.	We will keep you informed, listen to and acknowledge your concerns and insights, and provide feedback on how client input influenced our decision.	We will work with you to ensure that your concerns issues and ideas are directly reflected in solutions developed and we will provide feedback on how client input influenced our decision.	We will look to you for direct advice and ideas in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will hand over decisions for you to make and implement your decisions for the direct benefit of the individual, client group or community that we are working with.
Example activities to consider	<ul style="list-style-type: none"> • Fact Sheets • Service brochures • MA Website • Research and Advocacy Reports • Face-to-face meetings • Information sessions 	<ul style="list-style-type: none"> • Surveys (available in a range of different methods) • Feedback and exit interviews (in person, online or by phone) • Focus Groups 	<ul style="list-style-type: none"> • Workshops • Involvement in sector wide projects • Paid Participation projects • Clients involved in recruitment processes or panels 	<ul style="list-style-type: none"> • Client Advisory Councils or Action Groups • Participatory decision making • Co-design • Special Projects 	<ul style="list-style-type: none"> • Delegated or joint decision-making committees • Client-led programs or advisory boards • Partnership committees

Acknowledging power and vulnerability

There is often a power imbalance between professionals and individuals with lived experience, especially from marginalised groups (e.g., Aboriginal and Torres Strait Islanders, culturally diverse, LGBTIQ+). It is crucial to acknowledge these imbalances. Those in positions of power must actively create safety by using sensitive language and behaviours and take responsibility for equalising power when it is not willingly shared.

The customer-facing Homes NSW workforce needs to be trauma-informed, respectful and ensure customers understand their rights and responsibilities when accessing Homes NSW services. Staff should be trained and empowered to provide appropriate out of guidelines responses to vulnerable people, when required.

Mechanisms for Homes NSW to consider

Mission Australia encourages Homes NSW to build measures for client/tenant participation into the *Homes for NSW Plan*. These could include the following.

- **Advisory Councils and Reference Groups**
 - Mission Australia Housing's Tenant Action Groups have a strategic focus, setting medium to long-term goals. This is beneficial for both our services and tenants because they can improve tenant/staff relationships, improve tenants' skills and self-confidence and increase willing involvement into the design and delivery of services and broader advocacy issues.
- **Building a Lived Expertise workforce**
 - Lived Expertise Practitioners can contribute enormously to the development of person-led and recovery focused support because they inspire hope and are able to bring the unique skills and knowledge gained through lived experience and engagement to bear.
- **Quality assurance and service improvement initiatives**
 - Mission Australia builds tenant participation opportunities into our quality assurance processes that evaluate the effectiveness of programs. This perspective adds to the evidence base for how clients/tenants feel about a service, telling us what is working well and building our understanding of where quality and safety could be improved.
- **Create opportunities to contribute to service design and co-design**
 - Client/tenant input into the design of Mission Australia's services includes feedback from existing services; desk-based research into the needs of our clients/tenants and their communities; and consultation and co-design of service models with current and existing clients/tenants through contextual interviews and ideation workshops.
- **Strengthen community connections and collaboration**
 - This could be done through actively seeking partnerships with local organisations to build awareness, trust and the foundation for community-driven solutions.

4. Have we missed any challenges or possible reforms around customer-driven service?

Alignment of standards across public and community housing

The *Homes for NSW Plan* should commit to the delivery of consistent high-quality standards across social housing, irrespective of the provider. Homes NSW should commit to complying with the relevant NRSCH operational standards and should report on these as Community Housing Providers are required to.

Another area of its focus should be assessing and appropriately addressing any disparities in policies that apply to Community Housing Providers and Homes NSW, as well as the consequences for breaching these policies. For example, we have observed that the requirement to turnaround a property for a new tenancy in 14 to 28 days is strictly enforced for Community Housing Providers but not Homes NSW managed properties.

A further area is distribution of housing maintenance funding based on ownership or management of the home, such as with the \$1 billion Repair and Restore Maintenance program announced in the 2024 NSW Budget. Homes NSW could consider expanding access to this Program and further initiatives to ensure equity of maintenance spend on stock that is Government-owned and managed as well as Government-owned but community housing managed. The stock that has been transferred from the Government to the community housing sector are significantly aged and in disrepair and tenants would benefit greatly from access to this funding.

In some cases, the inherent difference in organisational structures and scale, available resources and budget flexibility needs to be acknowledged when assessing what is practicable and reasonable, and whether additional government support is required to meet higher customer excellence or guarantees. The value of a multi-provider system is the space and flexibility to innovate, and must not be inadvertently stifled by overly prescriptive Homes NSW policies while aiming for a threshold of quality consistency and service equity.

There is opportunity to better share practice across providers to aid in this effort, such as establishing resource portals or communities of practice. Many of the innovative ways of working listed in the Discussion Paper are initiatives that housing providers are already doing, such as Lived Experience programs, community engagement, using appeals and complaints mechanism to improve services.

Exploring pathways to private market and supporting at-risk private tenancies

A comprehensive housing response should address homelessness, housing and planning, and should reinforce the linkages between all three and private market housing. This includes strengthening private rental assistance products which have historically seen low uptake due to factors like restricted

eligibility, slow processing times and insufficient awareness-raising. The role of these rental assistance products should be articulated in the *Homes for NSW Plan*, especially given the undersupply of non-market housing.

Additionally, tenancy sustainment programs should be funded for at-risk private tenancies. There are many good examples of small-scale programs operated and funded by community services and Community Housing Providers which can provide best-practice insights. Homes NSW needs to take a more active coordination and funding role in this area to ensure equitable coverage for all people in need across housing tenures, including in the private rental market.

While private market tenancies are appropriate for some people, we advise against transitioning tenants from social housing to an unaffordable private market without ensuring sufficient support and accountability for their long-term housing outcomes.

5. What changes do you think we should make to improve social housing access and tenancy management?

An ongoing strong and collaborative approach with providers on reform

The Discussion paper indicates the potential for significant changes to social housing access and tenancy arrangements. Mission Australia welcomes Homes NSW's appetite for making improvements but would like to see a commitment and the infrastructure put in place in the *Homes for NSW Plan* to do so in partnership and shared decision-making with housing providers and SHS. The social housing system is complex and operates without optimum funding and resourcing, and so increasing customer agency, choice and ease – even marginally – could have serious implications for staff workloads, skills and training requirements, and turnaround times for dwellings, if for example there were:

- reductions in application information and documentation;
- increase in the number of offers to applicants (which providers currently have the ability to dismiss an offer from counting if unsuitable);
- change to allocation zones.

Housing assistance application processes

Positive steps have been taken to simplify housing assistance applications, like the no wrong door approach through Housing Pathways and online and phone applications via Housing Connect. However, barriers still exist, especially for homeless individuals:

- Excessive documentation is required, including third-party verification of homelessness, for social housing priority assistance, making it difficult for vulnerable people to even register. This process must be simplified.

- Maintaining a position on the NSW Housing Register is challenging for those at risk of homelessness, as they must keep their information current despite unstable living conditions.

Changes to improve this process could include:

- SHS case/support workers to have a profile in the Homes NSW application system, this would mean that workers with consent of the customer, would be able to upload documents and complete online forms with the person. The phase out of paper forms, and the move to online forms has made it more difficult when working with more complex and itinerant people. Often requiring customers to have to remember information and passwords to use on multiple borrowed devices. Centralizing this within a workers account on behalf of the customer would make this process more collaborative.
- Maintaining a position on the housing register – as above if this is co-managed with the SHS worker an alert or notification could be sent to the worker that a review/ check that the customers circumstances still require them to have an active housing application.
- Embedding the housing status into the By Name List will assist workers also to collaborate with housing staff.

Equipping housing providers with the support, policies and tools to respond to customers with high and/or complex needs

The Discussion Paper identifies the increasing levels of complexity of applicants on the waiting list and the fact that many applicants need long-term support to sustain their tenancy. This is a product of the social housing system devolving overtime into a safety net for those most critically in need and the limited vacancies often going to tenants facing a range of challenges.

In this context there are intersecting issues which will need to be resolved:

- meeting the costs of providing short-term through to permanent support to tenants so they can live independently and thrive in social housing;
- ensuring the capacity of local service systems (across remote, rural, regional and metro) to deliver the scale and types of support that is needed (e.g. alcohol and other drugs, mental health, financial counselling, domestic and family violence, homecare, etc.);
- willingness of local services to provide the required support when not mandated to (e.g. we know of instances where services withdraw from the most complex tenants);
- the extent to which Housing First principles are adhered to when a tenant's refusal to engage with support adversely impacts other tenants and neighbours (e.g. anti-social behaviour), or the housing provider (e.g. property damage, rent arrears, safety concerns);
- a minority of applicants are not suitable for general social housing and need supportive or permanent supportive housing models which are not available.

Exits from social housing frequently result in homelessness; therefore, it is essential to maximise the success of tenancies. Achieving this requires significant investment. To help build the case for the larger investment requirements – for example, boosting funding across the board for community, health and mental health support services and supportive housing models (permanent or otherwise) – we recommend Homes NSW commission modelling to understand the costs and benefits involved by ascertaining as a starting point:

- the cost of failed social housing tenancies (for housing providers, SHS, other government agencies) and churning through the homelessness and broader service systems;
- the costs of providing tiered levels of support into social homes based on estimated need;
- the costs of providing purpose built supportive and permanent supportive housing options that are suited to complex needs applicants on the waitlist or currently in social housing;
- the avoided costs and accrued savings to the government from boosting support in social homes and additional appropriate supportive housing models (permanent or otherwise) for tenants with high and/or complex needs.

Redefine the role of tenancy managers and staff to deliver customer-driven outcomes

Consideration must be given to the competencies and duties necessary for social housing tenancy managers and their staff to successfully deliver customer-focused outcomes. These include:

- **Investment in and support for a highly skilled workforce**
 - Staff need comprehensive assessment skills and the capability to respond to a wide range of needs.
 - Staff need high level communication and relational skills including the ability to sustain a genuine connection with clients who have complex needs or may display challenging behaviour.
 - Staff need a high level of support, including line management supervision and structured internal and/or external practice supervision.
 - Staff bring a knowledge of the service system and resources available to clients and are skilled in advocacy.
 - Staff need training in a variety of approaches to meet the diverse needs of an individual, such as recovery-oriented practice, trauma informed care, Mental Health First Aid, cultural competency, Motivational Interviewing and Domestic and Family Violence.

- **Increased emphasis on prevention and early intervention for tenants at risk of homelessness**
 - The reasons listed below often occur when people face vulnerabilities, and when early signs of this occur the proper skills and resources can facilitate intervention to avoid escalation of tenancy risk and homelessness:
 - Rent arrears;
 - Neighbour complaints;
 - Anti-social behaviour;
 - Noise complaints;
 - Property care issues or damage to property;
 - Not meeting legal requirements of tenancy;
 - Illegal and/or criminal activity;
 - This can't be done without the skilled workforce outlined above and a system that is designed to consider the KPIs for staff and whether there are disincentivise creating a barrier to this work.
- **Fostering collaboration and connections within the local community with relevant services, particularly for homelessness prevention.**
 - Develop wide ranging partnerships and referral pathways to help tenants access holistic supports, sustain tenancies, participate in their community and provide any ongoing support required after clients exit formal case management.
 - Engage with the local sector and other stakeholders to create place-based approaches to support clients in the context of a shortage of affordable housing options.
 - Investigate multi-disciplinary, multi-agency approaches with one clear lead agency and the client is included to ensure they are an active participant in determining their support goals and plans.
 - Connections and transitions to other services are actively facilitated through warm referrals to provide continuity, ensure the client feels supported and other services understand and can meet their needs.

6. How do we make sure the homes we build in the next few years are the right ones to meet the current urgent need, and the needs of our customers in the long term?

Location, design and adaptability of homes

The urgent need to increase social and affordable housing stock must not overlook the needs of customers and lessons learnt from previous large-scale build initiatives, such as to ensure:

- well-located homes (close to jobs, public transport, educational, health and other services);
- appropriate homes for family size, disability, ageing, cultural and other needs;
- meet universal design standards which include space and liveability criteria;
- tenure blind with market housing in the neighbourhood;
- allows ageing in place (as noted in the Discussion Paper that 44% of social housing tenants are over 55 years);
- flexibility to change designation from social to affordable housing as tenant circumstances change;
- supportive housing models (permanent or otherwise) that a significant minority of tenants will require to live independently and thrive.

Modular home construction method

This type of housing construction has been used overseas in countries like the USA, UK and Canada to rapidly deploy temporary housing to address homelessness as well as for permanent social homes in Australia (like under the WA Government's Modular Build Program).

The overseas builds for new homelessness facilities often utilised prefabrication methods to speed up deployment and construction time. For example, it took 90 days to construct 39 units (each 23m²) as part of a temporary modular housing project in Vancouver, Canada.

In circumstances of severe overcrowding and lack of alternative, culturally appropriate housing in Aboriginal communities, modular construction techniques should be more widely used, especially for the rapid construction of emergency housing.

Partnering with Community Housing Providers to deliver housing

Mission Australia welcomes Homes NSW's existing actions to increase the stock of homes in partnership with Community Housing Providers, such as through Housing Australia Future Fund applications and stock/management transfers. The community housing sector is well positioned to increase supply through proactive government policy, support and incentives, which would aid in meeting the *Building Homes for NSW* supply target of 8,400 homes.

Mission Australia supports CHIA NSW's recommendation in its submission, replicated below, as one of the ways to achieve this:

“Establishing a new governance framework with the community housing industry, incorporating a new Ministerial Council for Social and Affordable Housing, Community Housing Statewide Governance Forum, and a Homes NSW and Community Housing Providers Charter.”

Financing a sustainable social and affordable housing system

The funding provided by the National Social Housing and Homelessness Agreement, Commonwealth Rent Assistance (CRA) for some classes of social housing, additional funding from the NSW Government, and rental income from tenants is insufficient to cover the full cost of providing social housing. This shortfall creates a financial gap that threatens the sustainability of both Public Housing Authorities and Community Housing Providers.

If this funding gap is not addressed, it will lead to a further decline in the quality of existing social housing and hinder the development of new social housing units. Moreover, it will undermine the benefits of prior investments and fail to meet the growing demand driven by population growth and broader housing unaffordability.

One significant consequence of the marginal sustainability of social housing for Community Housing Providers is the creation of disincentives for offering more costly forms of supported housing to those in greatest need. This issue is particularly acute when it comes to providing housing for young people at risk of homelessness, as they receive lower levels of income support and CRA, resulting in lower rent payments. Rational decision-making by Community Housing Providers to limit cross-subsidised supported housing unfortunately means that many capable providers are unable to serve the individuals most in need of housing and support.

Articulate the vision and role for affordable housing in NSW

Alongside general financing issues for the social and affordable housing system, Homes NSW needs to address the challenges in providing this type of housing and determine its most appropriate beneficiaries. Topmost for Community Housing providers is the need to balance financial sustainability in terms of:

- financing its construction (further down we suggest mandatory inclusionary zoning can play a valuable role);
- covering operating cost when required to provide to people on low-incomes and those most in need.

Homes NSW should consider the ability for Community Housing Providers to be able to seek out a range of income levels for tenants to make affordable housing a more viable proposition. This could be trialled in metro areas where costs are relatively higher for providers.

Temporary solutions to the housing and homelessness emergency

In considering the immediate need for housing for people experiencing or at risk of homelessness, and the lack of social and affordable housing to meet current and future demand, temporary solutions may be needed in certain situations.

Temporary solutions may be appropriate for regional and remote locations where standard temporary accommodation options (e.g., refuges, shelters, motels and caravan parks) are inadequate or not available, as well as during and after natural disasters that involve the mass displacement of people who have no other means to remain safely housed.

However, we stress that temporary solutions such as those discussed below should not be viewed as a permanent solution to the housing and homelessness emergency, nor as an alternative to sufficient social and affordable housing.

Meanwhile use housing

Mission Australia recognises 'meanwhile use' can be an effective temporary accommodation solution if narrow criteria are met. This includes identifying sites early before essential infrastructure is removed; favourable zoning and 'existing use rights' that facilitate unrestricted stay (e.g., residential aged care facilities, serviced apartments); and receptive landlords (in cases of private land) and local councils. To be a cost and time effective approach for Community Housing Providers, most of these conditions need to be met, and weighed up against the alternative of dedicating effort and investment to growing permanent social and affordable housing.

While the aftermath of the COVID-19 pandemic and cyclical economic downturns present greater opportunities for 'meanwhile use', this should not divert from efforts to ensure long-term affordable housing solutions in social housing and the private market. To this end, where publicly owned land is available for housing, it should be prioritised for social and affordable housing rather than 'meanwhile use.'

Tiny homes

Tiny Homes are not a sustainable, long-term option for most people, as:

- They are only large enough for one person and are generally too small to have visitors. They may therefore perpetuate social isolation over long periods of time. This is particularly concerning if common areas are not provided.
- People may be at risk of overcrowding; a tiny home does not provide the appropriate space for more than one person.

Mission Australia's position is that Tiny Homes or housing of a lesser standard should not be accepted as a permanent place of residence, as they compromise the essential principles of dignity and independence that everyone deserves.

Nevertheless, in circumstances of an extreme lack of alternative temporary accommodation, Tiny Homes may provide an appropriate transitional option for some people, as they wait for long-term sustainable house.

Key worker housing

Mission Australia would welcome Homes NSW providing clarity on this term and eligibility to access this form of housing. Research by AHURI has found that:

- there is no universal definition of a key worker, but they are largely considered to be in employment that is key to the functioning of cities and on low to moderate incomes;
- 20% of key workers in Sydney could be classified as being in housing stress;
- 30,000 key workers in Sydney are in overcrowded dwellings;
- focus on affordable housing to rent does not address the strong home ownership aspirations of this group of workers;
- subgroups of key workers are more likely to need assistance, such as young workers not in the housing market, single income households, workers and their families requiring larger dwellings;
- overseas experience highlights that planning regulations and programs targeted to key workers tended to overtime be expanded to generalised working households on low to moderate incomes;
- policy should focus on increasing housing supply across the continuum, particularly on strategies to support home ownership in line with the aspirations of this group.

7. What changes should we make to ensure strong and sustainable estate communities?

The provision of housing and services for individuals alone is not enough to address the challenges faced by people living in areas of deep, persistent, and concentrated disadvantage. These areas require a community development approach that aims to strengthen the community, build residents' capacity, and engage people in collaborating on local solutions to local issues. Integrating tenancy management with community development is an essential component, as it ensures a long-term commitment to working with the community.

A place-based model is necessary to coordinate services, address intergenerational disadvantage through education and employment, and align housing renewal with locally tailored services and capacity building. Mission Australia is a founding member of the Strengthening Communities Alliance (SCA), a network of organisations dedicated to place-based, community-led work, and co-convenes the SCA Community of Practice for practitioners involved in such approaches.

Government funding for strengthening communities' initiatives would enhance the integration of homelessness and other community development efforts. The priority should be deploying community development workers in high-risk concentrated social housing communities ("estates") across NSW.

8. What actions would make the biggest impact in creating a housing and homelessness system that works?

Significantly increase investment in social and affordable housing

For people facing disadvantage and at risk of homelessness, or already experiencing homelessness, the need for social and affordable housing is critical. A recent AHURI research paper confirms what we hear from Mission Australia staff on the frontline across Australia: there are severely limited exit options from crisis and transitional accommodation. This situation is producing a range of issues that would be avoidable with more social and affordable housing, including:

- unnecessarily protracting homelessness and exacerbating trauma;
- backlogs and extended waiting times in the system; and
- exits to unsuitable accommodation or back into homelessness.¹

Mandatory Inclusionary Zoning to boost affordable housing supply

Mission Australia supports inclusionary zoning strategies that foster communities where all forms of housing are embraced. We recommend that the Government consider the work of The Constellation Project² on a National Framework for Mandatory Inclusionary Zoning (MIZ).

MIZ has not been consistently and coherently applied at a large scale in Australia. It has been taken up in pockets: for example, a form of MIZ has existed in designated zones in the City of Sydney for more than 20 years. However, because of their very limited application and small requirements, these schemes have yielded only 750 affordable rental homes over more than two decades.

What is really needed is a National Framework to coordinate the efforts of governments, developers and community housing providers to use MIZ to generate affordable housing at scale. However, it is important to note that a National Framework does not mean identical implementation in all locations. The Australian planning system is intricate and nuanced across multiple jurisdictions. A National Framework needs to be flexible for regulatory, project and market context.

The National MIZ Framework, underpinned by a set of seven guiding principles, articulates the benefits of MIZ and how it can be applied in the Australian context. The Framework addresses the requirements of and aligns to the National Agreement on Social Housing and Homelessness and the National Housing

¹ Batterham, D., Tually, S., Coram, V., Mckinley, K., Kolar, V., Housing, L., Mcnelis, S., & Goodwin-smith, I. (2023). Crisis accommodation in Australia : now and for the future (Issue 407). <https://doi.org/10.18408/ahuri5126801>.

² <https://theconstellationproject.com.au/>

Accord. It is comprehensive and addresses: transition arrangements; roles and responsibilities; notice periods; jurisdictional specific legislation; transfer process; land/dwelling/cash contributions; and capabilities required. It also considers an approach to grandfathering.

The Framework has been developed through the collaboration of over 60 stakeholders drawn from: Federal, State/Territory and local government; developers; the community housing sector; peak bodies for housing, planning and homelessness; academia; and professional services. The current is now being further refined with major developers.

Incorporation of the MIZ National Framework into the National Planning Reform Blueprint would significantly advance the objective of increasing the supply of social and affordable housing, as modelling shows that implementation of a MIZ policy could result in creation of up to 160,000 new homes for people on lower incomes in Brisbane, Sydney and Melbourne by 2036.

Medium-density housing

Mission Australia supports increased densification in established suburbs in major cities – the middle ring – as part of efforts to boost housing supply. This can include measures such as mixed tenure developments in brown- and grey-field sites, subdivisions and secondary dwellings (“granny flats”).

However, lessons from rapid and unplanned densification must be heeded to minimise community opposition and to avoid solving one problem only to create several more. Key considerations need to be the updating of overstretched and neglected essential infrastructure in middle ring suburbs, and ensuring the community dividend is sufficient and not outweighed by wealth accumulation and transfer to land holders and developers through unlocking additional value to already lucrative land assets.

Under properly managed plans, which include a community change management component, densification of the middle ring can play a significant role in increasing supply of social and affordable housing.

Models of housing plus support

Most people at risk of or experiencing homelessness can live successfully and independently in their own affordable private rental or social housing home; some will require support services to differing levels of intensity at different times. However, specialised housing plus support models are required for the minority of people who need intensive support.

Support provided to complement permanent housing

A strong housing “bricks and mortar” program to increase supply of homes for people on very low to moderate incomes is a necessary but not sufficient response to homelessness. It needs to be complemented by a strong support system for people who require assistance: firstly, to access housing and manage their other support needs; and thereafter to sustain their housing with both tenancy and other supports. It is fundamental to recognise the critical role of homelessness programs in the permanent housing domain.

Once housed, support to sustain tenancies and meet other needs can be provided to people from the stable base of their permanent home, whether that is in private rental or social housing. Despite the solid evidence of the effectiveness of this type of intervention, current coverage across the country is inconsistent and inadequate to meet demand.

Housing and support for young people

Ideally, all children and young people can live safely with their families or kin; this sometimes requires prevention assistance in the form of parenting support, family counselling, family reunification programs and services like Reconnect. Where it's not possible for families or kin groups to live safely together, children and some young people enter the out-of-home care (OOHC) system.

Leaving OOHC is a time of especially high risk of homelessness, necessitating close attention to exit-care policies and practices as a measure to prevent homelessness. A small cohort of young people, particularly those aged between 16 and 24, prefer and can reside in a semi-independent housing arrangement, rather than with a foster family or in a residential out-of-home care (OOHC) setting.

Sometimes, such young people can live successfully independently in private rental or social homes, either without support or with low-moderate levels of support delivered in their own homes. However, others need more intensive support:

- Some young people who cannot live at home and face homelessness have low to medium support needs and are able and motivated to engage actively in education or employment. For this group, Youth Foyers are a very effective model. The model assists young people to engage in education and employment, and gradually to reduce their dependence on social services. Youth Foyers generally have self-contained accommodation, on-site support workers, education programs, variable levels of support where a young person can progress to more independent living, onsite facilities and employment supports.
- Based on 2020 data from 9 Foyers across Australia, young people are 1.6 times more likely to achieve a higher level of education compared to SHSC. Further, 65% of young people in Foyer gain employment compared to 51% in the SHS, and 80% exit into stable housing.³ Using conditional probability modelling to estimate SHSC outcomes relative to Foyer outcomes, it is estimated that Foyer results in an overall per person benefit to government of \$90,042.48 (in June 2023 dollars) in avoided costs over 40 years. The investment in Foyers is paid back within 4 years.
- Others, particularly those with traumatic experiences from family violence or their time in the OOHC or juvenile justice systems, have higher support needs. For this group, special housing

³ Accenture (2022). Under oneRoof: The Social and Economic Impact of Youth Foyers, https://foyer.org.au/wp-content/uploads/2023/04/FoyerFoundation_UnderOneRoof_FULLLReport2023.pdf

models with on-site therapeutic support should be co-designed to meet their needs.⁴ The NSW Premier's Youth Initiative⁵⁶ provides a starting point for building a co-designed model that can then be scaled up. This accommodation can also be designed and designated for particular groups, such as LGBTQI+ young people; an example is the partnership of MyFoundations Youth Housing and Twenty10 to provide transitional housing.⁷

With effective support, most young people can spend time in these models and emerge ready and able to live independently. Accordingly, these supportive housing models are not permanent, as are the others discussed here, but usually will be lived in for two or three years.

Permanent supportive housing

Multiple sources of evidence have pointed to permanent supportive housing models⁸ as an effective approach to ending homelessness for people living with a multitude of co-occurring complex medical, mental health and/or substance use issues.⁹

People in these circumstances will frequently have had histories of chronic rough sleeping. They usually have significant physical and/or psychosocial disability. Their support needs are so intensive that living independently is likely not feasible in the foreseeable future and therapeutic support is required to be on-site or immediately accessible. These are people's homes for life, or as long as they choose to live there. Support is available if they need it, of a type and intensity of their choosing.

There is a serious shortage of permanent supportive housing models currently in Australia, for example with only one option (Common Ground in Camperdown) so far available in greater Sydney. Although they are only required by a small cohort of people, they have very high needs; these purpose-built

⁴The Constellation Project (2022). Lived experience voices: insights into young people's transition from the child protection and youth justice system in South Australia and the intersections with homelessness, https://theconstellationproject.com.au/wp-content/uploads/2022/11/Lived-Experience-Voices-Report_1122-1.pdf.

⁵See further: <https://www.facs.nsw.gov.au/reforms/youth-initiatives-in-housing-and-homelessness/housing-and-homelessness-programs-for-young-people/premiers-youth-initiative>.

⁶Yfoundations (2021). Evaluating the Premier's Youth Initiative: A Yfoundations Research Bite, <https://assets.nationbuilder.com/yfoundations/pages/154/attachments/original/1654123703/Yfoundations-Evidence-Bite-FINAL-2021.pdf?1654123703>.

⁷See further: <https://mfyh.org.au/youth-housing-product-overview/>.

⁸Permanent supportive housing models are sometimes called 'Housing First' models in Australia. However, we take Housing First models to be those with fidelity to the original Pathways to Housing model developed in New York in the 1990s with specific characteristics including *rapid housing access, consumer choice, the separation of housing from support, holistic recovery and harm minimisation, and community integration*. (See further: Roggenbuck, C. (2022) Housing First: An evidence review of implementation, effectiveness and outcomes, <https://www.ahuri.edu.au/research/research-papers/housing-first-an-evidence-review-of-implementation-effectiveness-and-outcomes>.) We use the more general term 'permanent supportive housing' here to describe initiatives that combine permanent housing with intensive support, either on-site or immediately available, generally targeted to people with chronic histories of homelessness and high and complex needs, which may or may not meet the strict criteria of the original Housing First models.

⁹Constantine, S. (2023). Ending homelessness in Australia What is the problem?, <https://lifecoursecentre.org.au/wp-content/uploads/2023/06/2023-13-LCC-Working-Paper-Constantine.pdf>.

models are therefore high cost but provide dignified and restorative homes and ultimately reduce whole-of-society costs.

Those avoided costs are typically in areas such as health, AOD treatment and justice, so funding for permanent supportive housing models should therefore be supplemented outside housing and homelessness funding streams. This could include funding contributions from, or in-kind partnerships with, government or non-government funded health, mental health and AOD agencies. For example, at Common Ground Camperdown, co-located mental health and AOD services are provided to residents on-site in a joined-up model of service delivery.

Effective models of permanent supportive housing include the following:

Michael's Intensive Supported Housing Accord (MISHA) ¹⁰

MISHA was one of the first examples of a permanent supportive housing program in Sydney (2010-2013) supporting chronically homeless men access permanent housing rapidly and then sustain that housing over time. Operated by Mission Australia and funded through philanthropic investment, the MISHA program provided wraparound support prior to and following access to permanent housing. Caseworker-based services provided included housing access and tenancy support, alcohol and other drug use support, mental health support, family relationship support and a range of other services. The sustained tenancy rate was 89% after two years and the wellbeing of program participants rose over that time. There were also sustained reductions in health, justice and income support costs to government, with avoided costs of \$10,656 per person over the two years.

J2SI (Journey to Social Inclusion)

J2SI is a trauma-informed, intensive case management program that supports people to exit homelessness by providing those most in need with housing and long-term support to improve their health, well-being, independence, and social connections required to experience and maintain a better quality of life (Seivwright et al., 2020). The program is targeted to those experiencing long-term, chronic homelessness and was evaluated with a randomised control trial. Positive housing outcomes were achieved and health and justice service usage costs decreased over a three-year study period, with an estimated saving of \$39,756.67 per person over the three years.

¹⁰ See further: Mission Australia, From Homelessness to Sustained Housing, 2010 – 2013, MISHA research report, accessible at: <https://www.missionaustralia.com.au/documents/279-from-homelessness-to-sustained-housing-2010-2013-misha-research-report-2014/file>.

Brisbane Common Ground

Brisbane Common Ground is a supportive housing initiative that aims to provide sustainable housing and improve the quality of life for people who have experienced chronic homelessness (Parsell et al., 2015). Tenants had positive wellbeing and inclusion outcomes and there was a significant reduction in service utilisation costs of \$34,402 per person per year, offsetting the costs of delivering the program which were \$17,971 per person per year.

Shift the system towards a prevention footing

We strongly support efforts to move from a crisis-driven system to a prevention-driven system but recognise that it will take time and careful planning. We would like to see a clearer statement of intent in the *Homes for NSW Plan*.

Over the short term, the first step should be to establish a Prevention Transformation Fund. The need for this is derived from conclusions drawn from the Homelessness Solutions Model Framework discussed in the next section. A Prevention Transformation Fund would establish a ringfenced funding stream for interventions specifically designed to support people with at-risk tenancies to maintain their housing.

While rates of homelessness remain persistently high and the housing emergency continues, investment must continue in homelessness crisis measures. However, at the same time, a robust additional investment strategy focused on prevention measures must be implemented over and above current spending; if not, homelessness will only increase. Taking a systems approach to ending homelessness necessitates proportionate effort and resource allocation devoted to the prevention domain until, over time, the SHS system becomes increasingly residual as the only experiences of homelessness are rare, brief and non-recurring.

Establish a framework of housing and homelessness interventions to drive investment decisions

The current state of the homelessness service system, where investment is heavily skewed to crisis responses as opposed to prevention responses, has emerged disjointedly over time, untethered from any structured conceptualisation of the system and with no view of any future direction.

Without a clear framework to conceptualise all types of housing and homelessness measures, responses and solutions, we cannot assess each type's relative effectiveness and cost-effectiveness, nor can we make evidence-based determinations about the best resource allocation.

We have developed a prototype of a Homelessness Solutions Model Framework with Professor Paul Flatau of the Centre for Social Impact at the University of Western Australia and with input from an

Expert Advisory Group, which identifies the full range of available housing and homelessness measures. The Framework is populated with a suite of specific Australian interventions and their evaluations, showing variables including: the evidence about their effectiveness; the unit cost to deliver; avoided costs; the quality of the evidence; etc. While the population of the Framework has not yet been completed, it is sufficiently advanced to draw important conclusions and to demonstrate the usefulness of the work.

9. What actions would make the biggest impact to increase self-determination for Aboriginal people and families across the NSW housing and homelessness system?

Achieving genuine choice and self-determination requires an understanding of the dynamic preferences of communities in service delivery and social housing, and for alternatives to be available which reflect those preferences, and how these shift over time.

Action should prioritise engaging with community to understand their service delivery needs and preferences, and should explicitly require homelessness and housing organisations - whether or not they are Aboriginal community-controlled organisations (ACCOs) - to undertake service design and delivery in a way that is demonstrably culturally appropriate, effective and determined by the local communities' choices.

We note that non- ACCOs deliver housing and homelessness services to more Aboriginal and Torres Strait Islander people than are delivered by ACCOs. Such "mainstream" housing and homelessness providers must have the capability to deliver culturally safe, culturally appropriate services, and work within cultural safety frameworks, and should be included in the service mix where communities want them to be. Non-ACCO organisations, if genuine, are already employing First Nations peoples from their own communities to serve those communities, and the contribution of such staff should be acknowledged.

10. What are the risks and opportunities in developing an agreed set of system-wide measures to track progress against the priorities and objectives?

The *Homes for NSW Plan* needs accountability mechanisms such as targets with relevant corresponding outcome measures and performance reporting at the system level, service level, individual and community level (like Closing the Gap). Targets are needed as they drive priority setting for Homes NSW and funded services, resource allocation and determining the solutions to achieve them. Targets should be measurable, ambitious yet achievable and have firm and unambiguous language so there is common understanding among accountable parties. The final targets and outcome measures should be developed in with relevant stakeholders and align with the *NSW Homelessness Strategy*.