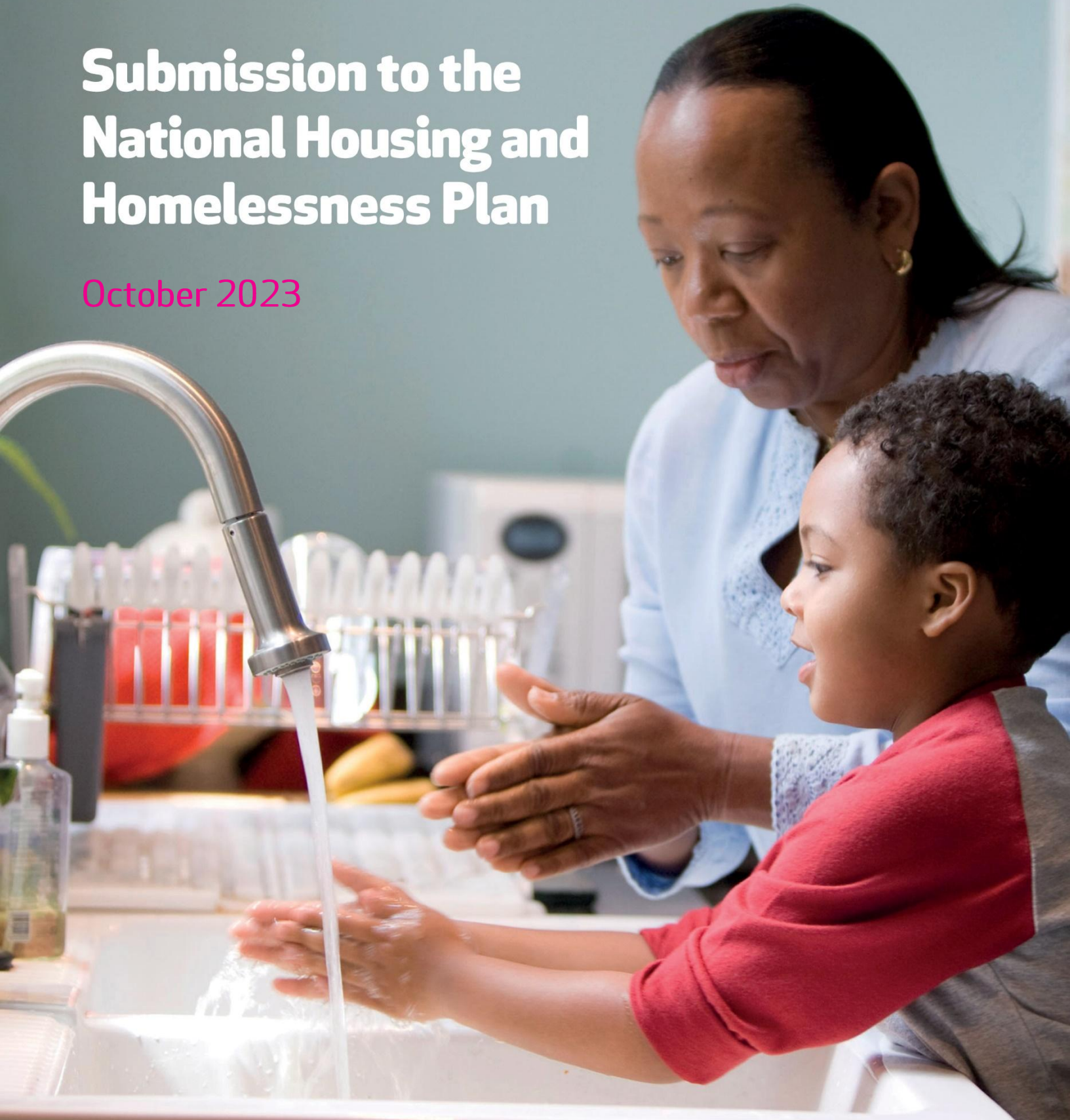


**MISSION
AUSTRALIA**

**Submission to the
National Housing and
Homelessness Plan**

October 2023



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Executive summary

A bold plan is needed

It has been 15 years since Australia last developed a comprehensive national policy on homelessness, and over 30 years since a national housing policy was released.^a In the years since, the housing and homelessness systems have largely been left on ‘set and forget’; unresponsive to a brewing housing and homelessness crisis which has now grown into a chronic and compounding emergency.

The National Housing and Homelessness Plan must meet the moment. It must provide a credible path towards ending homelessness and building a housing system that provides secure, stable, affordable housing for all. This is vital to ensuring that all peoples and communities in Australia can thrive.

“We consider that a dwelling of good standard and equipment is not only the need but the right of every citizen – whether the dwelling is to be rented or purchased, no tenant or purchaser should be exploited for excessive profit.”

- Commonwealth Housing Commission, 1944

This quotation is from the cover letter attached to the 1944 Final Report of the Commonwealth Housing Commission to the Minister of State for Post-War Reconstruction, Ben Chifley.¹ The Commission reported on the contemporary housing position of Australia and the housing requirements during the post-war period.² The findings provided the catalyst for significant government investment to fix the dire state of the nation’s housing (slums, tenements, and lack of security of tenure and choice) following the Great Depression and WWII by way of a national public housing program.³ The response was conceived and driven by a moral imperative, and it was bold. Over the next 11 years, over 96,000 public homes were built (14% of all total homes).⁴ For comparison, in the last 11 years only 29,800 social homes were built (1.5% of all total homes)⁵ while over 200,000 households have been left languishing on the housing waiting list.

Australia once again is confronted with a dire housing situation that requires a similar act of boldness. In communities across Australia, Mission Australia’s services have never seen a worse housing environment. There’s been a 26% increase in people seeking our help for homelessness, and a 50% increase in people who are actually homeless (as opposed to at risk) when they do so.⁶ Overwhelmingly, our staff at the frontline cannot help people into housing because there simply isn’t any. When crisis and transitional accommodation is full, families and individuals are living for months in cars, motels, in tents in parks, on the streets. That is why we call for a bold National Plan which moves beyond simply *addressing* to once and for all *ending* homelessness.

^a The Road Home, A National Approach to Reducing Homelessness (2008) and the National Housing Strategy (1992)

Building on commitments already made

So far, in response to the housing emergency, the Federal Government and many State, Territory and local governments have committed to a raft of reforms that, over the medium and long term, are intended to increase supply of housing, with a minor proportion targeted to people on very low to moderate incomes.

These initiatives are a welcome start, but significantly more needs to be done, as outlined in this submission. For some people, having a safe, stable home they can afford is enough. Others require more than a home, and need support from homelessness services and/or other systems (e.g. welfare, NDIS, health) to sustain housing. A teenager living away from home due to family conflict will need family mediation and counselling services to safely and stably return to housing. A person struggling with gambling addiction may secure a tenancy, but is unlikely to maintain it without tenancy support, addiction treatment and financial counselling. Without sufficiently resourced and coordinated service systems, people in the those and similar situations will struggle to avoid homelessness even if housing can be secured.

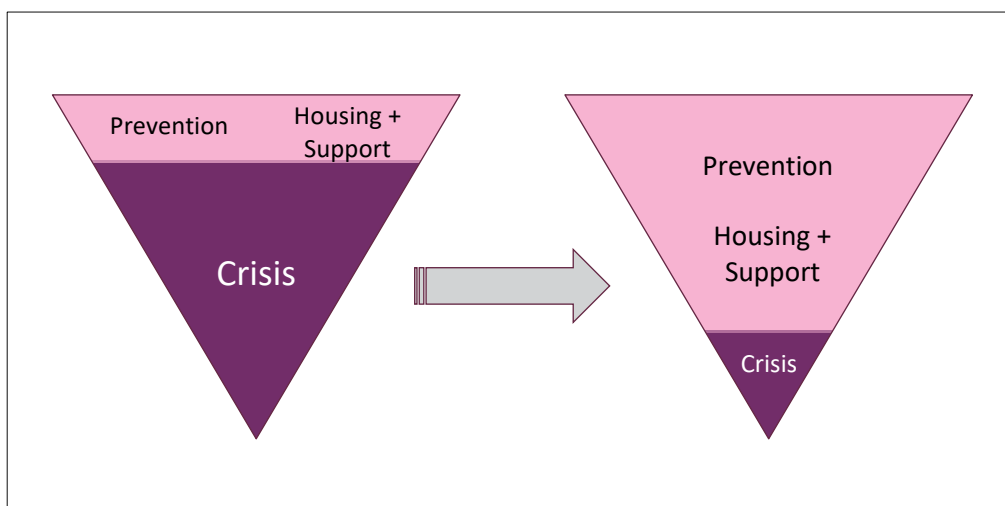
Creating a system designed to end homelessness

The homelessness service system must substantially transform if we are to end homelessness. Currently, Mission Australia and others are working within a system designed primarily to respond to people when they are homeless, or when it is *almost* unavoidable – this is too late. If we build capacity and capability to respond to people sooner with the right assistance, we will avoid unnecessary human misery and make the goal of maintaining or finding housing (with or without complementary supports) far more successful.

For too long now, the majority of effort in the homeless system has been allocated to cost-intensive crisis responses: an understandable result of decades of underfunding and shortsighted refusal to invest in upstream solutions. The system needs to gradually transition to a future state which, while maintaining a necessary level of crisis response, primarily focuses on upstream solutions – in both housing and support provision - with a larger proportion of effort allocated to policies, practices and programs that effectively prevent people falling into homelessness in the first place or intervene early to ensure that homelessness is *rare, brief and non-recurring*.

In effect, this system transformation would eventually rebalance the homelessness service system, to quickly divert people at risk of homelessness into stable housing, and ensure that effective pre-emptive measures avoid costs to multiple service systems over the longer term.

Figure 1. Shifting to a prevention approach



A new \$500 million Prevention Transformation Fund

The managed evolution of the homelessness service system from its current crisis-driven state to a future state based around upstream solutions will start with a period of front-loaded investment. Assisting the unprecedented high number of people in housing crisis is an unavoidable humanitarian requirement, but alongside this must be increased effort and investment in assisting people at risk to avoid becoming homelessness in the first place.

To shift the system to this more efficient footing, Mission Australia recommends that the centrepiece of the National Plan be a \$500 million Prevention Transformation Fund (PTF) made up of new additional investment in the next National Housing and Homelessness Agreement (NHHA). The PTF has the main objective of catalysing the transition to prevention by funding policy, program and practice changes, investing in evidence-based housing and support models, with the secondary objective of freeing up investment in housing and homelessness over the longer term as the need for cost-intensive crisis interventions diminishes.

One million new social and affordable homes over 20 years

A systemic approach to the prevention, reduction and eventual elimination of homelessness relies on having an adequate supply of affordable housing in which people can live safely and securely. This is currently denied to over 230,000 households in Australia who are registered on State and Territory social housing waiting lists. However, the need in the community is much higher; it is closer to 640,000 households and is expected to jump to almost one million in the next 20 years without commitment to a meaningful social and affordable housing building program.⁷

Five core elements for the National Plan with underlying actions

- 1.** Adopt a systems approach to housing and homelessness
- 2.** Deliver affordable permanent housing for all
- 3.** Boost homelessness prevention measures
- 4.** Maintain homelessness crisis measures
- 5.** Embed accountability, data collection and performance reporting



1.

Adopt a systems approach to housing and homelessness

A systems approach to policy design is required to end homelessness and secure affordable housing for all Australians. This brings to bear the full spectrum of policy responses: from housing supply; to universal prevention measures; through to targeted prevention measures for those at observable risk of homelessness; to crisis housing and support responses for those who do become homeless. It moves us towards more purpose-driven and sustainable housing and homelessness systems, underpinned by guiding principles and backed by sufficient funding and resourcing.

The National Plan must reflect the following actions:

- 1.1. All governments agree that the National Plan and the next National Housing and Homelessness Agreement (NHHA) will:
 - adopt a systems approach to ending homelessness;
 - be structured around a Homelessness Solutions Model Framework; and
 - base resource allocation around the principle of gradually shifting the homelessness services system, through a credible roadmap, away from its current state emphasis on crisis responses towards a more cost-effective emphasis on prevention.
- 1.2. All governments commit to incorporate specific homelessness prevention and response actions into all other relevant policy settings, strategies and initiatives, including those for tax and transfer settings, income support, domestic and family violence, mental health, disability and youth.
- 1.3. All governments commit to a set of principles to underpin the systems approach to ending homelessness following a consultation period with people with lived experience of homelessness, homelessness researchers and representatives from the community sector.
- 1.4. All governments agree to distribute the NHHA funds according to needs-based funding model for future NHHA agreements, calculated with multi-source data about the characteristics of the homeless and at-risk populations, as well as homelessness cost drivers, unmet need and risk factors to approximate equitable jurisdiction-level allocations centred on people's real need.
- 1.5. All governments investigate as a matter of urgency both direct and indirect investment options as a way to sufficiently fund the growth and maintenance of the social housing system, including capital grants, stock transfers and erasing State and Territory housing debt.

- 1.6.** All governments implement a commissioning approach and guarantee long-term investment in services with a minimum of five-year funding contracts, to maximise efficiency, realise the full benefits of programs and give service users and frontline workers greater certainty.
- 1.7.** The Federal Government invest in a national homelessness sector and workforce capability program that will support high-quality evidence-based practice and the shift to a prevention approach.
- 1.8.** All governments agree to the co-development, alongside First Nations housing and homelessness organisations, experts and communities, of a specific First Nations Housing and Homelessness Plan, which takes a systems approach to the interlinked issues of inadequate housing, homelessness and other forms of disadvantage, through the Closing the Gap framework.
- 1.9.** The Federal Government launch an awareness campaign both to educate the community and mainstream service providers about homelessness and to help build support for strong action to end homelessness and provide everyone with a safe home.



2. Deliver affordable permanent housing for all

A well-functioning housing system which caters to various household incomes and housing aspirations is a necessary universal homelessness prevention measure. The National Plan must consider the housing spectrum wholistically, from urgently needed non-market solutions (social and affordable housing, crisis and transitional accommodation) to easing affordability, security and access of market housing (private rentals and homeownership). Government support to repair the housing system needs to prioritise people most in need.

The National Plan must reflect the following actions:

- 2.1. All governments deliver enough social and affordable housing to meet the projected demand over 20 years, including targeted funding for co-designing, replicating and scaling up of housing and support models that are effective for at-risk groups.
- 2.2. The Federal Government commit to funding for different housing plus support models – specifically including Youth Foyers and permanent supportive housing models.
- 2.3. The Federal Treasurer direct the Productivity Commission to model and analyse all Federal and State/Territory tax settings impacting the housing market and provide any recommendations that will increase supply and affordability of homes to rent and buy.
- 2.4. The Federal Treasurer direct the Productivity Commission to undertake a comprehensive review of rental subsidy programs including Commonwealth Rent Assistance (CRA) and State/Territory schemes and, until its recommendations are implemented:
 - the Federal Government provide an immediate interim increase to CRA by 50%.
 - all State and Territory governments commit to delivering adequate private rental financial assistance schemes.
- 2.5. National Cabinet build on and operationalise its *A Better Deal for Renters* initiative with reference to reforms called for by the National Association of Renters' Organisations, National Shelter, Better Renting and Everybody's Home.
- 2.6. All governments, through the Council on Federal Financial Relations, agree to coordinate first homebuyer support programs, target them towards lower income households and ensure they contain non-inflationary measures.
- 2.7. National Cabinet, through the National Planning Reform Blueprint:
 - facilitate more medium-density housing in established “middle ring” suburbs;
 - fast-track social and affordable housing development applications;
 - adopt a National Mandatory Inclusionary Zoning Framework; and
 - increase flexibility for emergent housing models such as co-housing.

3. Prioritise homelessness prevention measures

Preventing homelessness from occurring in the first place is better than fixing it later. It not only helps to reduce the number of people who experience homelessness but also helps to reduce the associated personal, societal and economic costs. The National Plan must prioritise this critical reform with a credible roadmap that includes the following actions to ensure a successful transition to a prevention-oriented approach to homelessness.

The National Plan must reflect the following actions:

- 3.1.** The Federal Government lift income support payments to at least \$78 a day to keep people who are in need out of poverty and out of homelessness risk.
- 3.2.** The Federal Government commit to the establishment of a \$500 million dedicated Prevention Transformation Fund in the National Plan; and all governments should negotiate to include it in the next NHHA, to commence in July 2024.
- 3.3.** The Federal and State/Territory governments negotiate the inclusion of relevant prevention outcomes in the NHHA.
- 3.4.** All governments agree to strengthening the role of mainstream services in delivering a holistic approach to ending homelessness. This should be supported by:
 - a ‘duty to assist’ across universal welfare services to trigger public officials to screen for homelessness risk and activate supports and referrals, providing a joined up approach;
 - local initiatives to join up support and implement a no wrong doors approach;
 - training and resources for mainstream services;
 - a commitment of no exits into homelessness.
- 3.5.** All governments agree to prioritise the safety and stability of children and young people by boosting funding and availability of evidence-based child and family support services, youth services, specialised domestic and family violence services and school-based supports.
- 3.6.** All governments agree to include funding for crisis and emergency prevention programs for people at elevated risk of homelessness in the Prevention Transformation Fund.
- 3.7.** All governments agree to retain a dedicated funding stream for the Reconnect program.



4. Maintain homelessness crisis measures

Once people enter homelessness, most need help to exit as quickly as possible into stable housing with any necessary supports. This includes outreach or on-site wraparound support services, crisis and transitional accommodation, and transitional accommodation for First Nations people visiting other communities.

The National Plan must reflect the following actions:

- 4.1.** All governments commit to increase funding in the NHHA in response to the housing and homelessness emergency for current crisis homelessness measures, while noting that over time this amount should reduce as the system shifts to a prevention approach.
- 4.2.** The Federal Government set up a taskforce within Housing Australia in partnership with affected communities to assess their local, place-based accommodation needs and develop strategies to deploy timely temporary solutions while the required long-term social and affordable housing stock is delivered.

5. Embed accountability, data collection and performance reporting

A lack of accountability on where funding is directed and the impact it has creates a challenging environment to make informed decisions on what should be continued, scaled up or down, or stopped. Commitment to actions that produce transparent and accountable performance monitoring and reporting that measures the impact of funding across the housing and homelessness systems, aligned to the policy intent and targets of the National Plan, is required. Clear governance arrangements must be established to support this work and generate advice on continuous improvement of the housing and homelessness systems based on the evidence and insights being generated.

The National Plan must reflect the following actions:

- 5.1.** All governments agree to adopt ambitious housing and homelessness targets in the National Plan to drive the change that is required and to maximise accountability among relevant parties.
- 5.2.** All governments agree to establish transparent and accountable monitoring and reporting provisions that measure the impact of funding and activities across the housing and homelessness systems and interface with mainstream services in relation to established targets and outcomes. This should include:
 - the regular publication of progress against targets and outcomes as soon as data are available; and
 - an outcomes-based performance monitoring and evaluation framework incorporating a theory of change and short-, medium- and long-term indicators.
- 5.3.** The Federal Government establish an independent Advisory Council on Homelessness.
- 5.4.** Federal and State/Territory governments establish the following governance arrangements to facilitate a coordinated approach to housing and homelessness research, evaluation and data improvement:
 - a national homelessness research and evaluation program;
 - a Housing and Homelessness Data and Evaluation Working Group to report to the Housing and Homelessness Ministerial Council; and
 - a “what works” centre for housing and homelessness policy.

1. Adopt a systems approach to housing and homelessness

A systems approach to policy design is required to end homelessness and secure affordable housing for all Australians. This brings to bear the full spectrum of policy responses: from housing supply; to universal prevention measures responding to societal drivers; through to targeted prevention measures for those at observable risk of homelessness; to crisis housing and support responses for those who do become homeless.

Homelessness is the result of failures across many systems. In particular, it is the result of failures in welfare systems, insufficient affordable housing investment and market-manipulating taxation settings, alongside dysfunctions in mainstream health, justice and child welfare systems.

Accordingly, homelessness and housing measures need to be considered alongside and integrated with other parts of the human services system. And all relevant areas of policy must be brought to bear in the creation of the National Plan and supported by a new NHHA with strong funding commitments. While historically the Federal Government has mostly kept its remit to contributing funding to the housing and homelessness systems, important major policy settings available only to the Federal Government need to now be activated with purpose. This includes policies that impact structural factors – such as poverty levels, unemployment rates, taxation regimes and macro-level social policy settings, as well as lack of affordable housing – which research shows strongly influence homelessness.⁸

Countries with robust poverty-reduction measures have lower levels of homelessness, and homelessness is determined by housing market conditions⁹ including, in Australia, the availability of public housing which is a strong protective factor against homelessness.¹⁰

Table 1. Key policies areas to activate

Federal Government	State/Territory governments	Local governments
<ul style="list-style-type: none"> - Public infrastructure - Taxation and revenue generation settings - Income support - Commonwealth Rent Assistance - The national regulatory framework for community housing 	<ul style="list-style-type: none"> - Stamp duties and land taxes - Residential tenancy laws - Planning controls - Inclusive zoning - Transfer of public housing assets or management to community housing providers 	<p>Local planning system which can facilitate the delivery of social and affordable housing</p>

Given the influence of other policy and system settings on homelessness and housing outcomes, there needs to be consideration and alignment with Closing the Gap, the National Plan to End Violence against

Women and Children and all future overarching policy documents such as the Youth Engagement Strategy.

Some types of homelessness prevention, sitting outside the direct purview of homelessness and housing, may escape the attention of policymakers as homelessness prevention measures. They may end up falling outside the direct remit of the National Plan.

Nonetheless, they are essential to ending homelessness in Australia and should be pursued. Large-scale homelessness will continue as long as policy and associated funding continue to focus on addressing homelessness once it occurs, rather than preventing it.

Establishing a framework of housing and homelessness interventions

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.

Such a framework would include prevention measures as well as crisis measures for people already experiencing homelessness. But, while there is wide acceptance that prevention is required to end homelessness, there is no commonly understood definition or framework used by practitioners in the homelessness and housing sectors that covers the full range of crisis and prevention measures.¹¹

This needs to be resolved in the National Plan so everyone working to end homelessness has a shared language and clear understanding of the part that existing, expanded and new roles across mainstream and specialist service systems will play in this much-needed reform effort. Without establishing this foundation, we will continue to talk about different homelessness measures without understanding their relationship to other measures, or the relative weight that should be placed on each.

We have developed a prototype of such a Homelessness Solutions Model Framework, identifying the full range of available housing and homelessness measures and recommend that it form the structure of the National Plan. We have populated the Framework 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.

The Framework has been developed by Professor Paul Flatau of the Centre for Social Impact at the University of Western Australia and Mission Australia, with input from an Expert Advisory Group

comprising Associate Professor Selina Tually, Associate Professor Catherine Robinson, Professor Hal Pawson and Professor Cameron Parsell, and advice from peak bodies, Mission Australia practitioners and other experts. The views presented in this paper are those of the Mission Australia..

The Framework is detailed in the attached discussion paper, *A prototype Homelessness Solutions Model Framework: Evidence-based cost-effective solutions to ending homelessness in Australia – A Discussion Paper*, and summarised briefly here.

The rationale for developing the Framework is to address the key question: **How should Australian governments allocate resources to end homelessness?** To that end, the Framework incorporates evidence about the effectiveness, costs and cost-effectiveness of housing and homelessness responses across the full spectrum of responses required to end homelessness in Australia.

Our prototype Framework categorises all possible housing and homelessness measures into the following policy and program domains and intervention types:

1. **Permanent housing with support as required** — increasing the supply of social and affordable housing and funding for support programs, including:
 - Housing for people with no support needs
 - Housing for people with support needs
 - Permanent supportive housing for people with experiences of chronic homelessness and multiple disadvantage
2. **Prevention measures** for people at risk of homelessness, including:
 - Universal homelessness prevention measures, to address societal drivers of homelessness
 - Targeted support for cohorts with elevated risk of homelessness
 - Responses that prevent entry to housing crisis/homelessness including tenancy support measures
3. **Crisis responses for people experiencing homelessness**, including:
 - Outreach support
 - Transitional housing and support

These domains are discussed in this submission in Sections 2 (Deliver affordable permanent housing for all), 3 (Boost homelessness prevention measures) and 4 (Maintain homelessness crisis measures).

As noted in the attached discussion paper, the Homelessness Solutions Model Framework is still in prototype phase. The development of the prototype Framework has made clear that the evidence base is patchy about outcomes achieved by homelessness programs, on social housing and affordable housing initiatives,^b and on the cost of interventions. Consequently, the discussion paper is a start to the process and certainly not the end.

^b When we refer to “social and affordable housing” in this submission, we mean homes that are provided through both the private market, social housing and affordable housing delivered by community housing providers at 75-80% of market rates, and homes that are: safe; affordable to people on very low to moderate incomes at a rate

Nevertheless, the evidence base is strong enough for us to be confident in concluding:

- Effective and cost-effective measures are available to prevent homelessness, both housing responses and support responses. Currently in Australia, these measures do not operate at scale.
- Other effective and cost-effective measures are available to shorten people's time in homelessness crisis and to prevent recurrence. Most resources in the homelessness service system are currently allocated to crisis responses.
- Deeper investment in homelessness prevention would constitute an effective and cost-effective systemic approach to resolving the current homelessness situation.

The evidence base is also robust enough to support recommendations to: deliver a dedicated Prevention Transformation Fund; and, increase permanent supportive housing for people with complex needs.

We also recommend that government policy makers, researchers and practitioners now work together to refine the Framework and populate it more fully, so that collectively we can be in a better position to fully understand outcomes achieved for net investment provided across the full housing and homelessness spectrum.

Further, over the longer-term, we recommend that this Framework be the starting point for a co-designed, evidence-based Resource Allocation Model that will assist policy makers direct absolute and relative expenditure on different types of interventions with the end goal of ending homelessness.

At the present moment, policy attention and funding is concentrated towards crisis responses for people already experiencing homelessness, delivered primarily through specialist homelessness services (SHS), assertive outreach, and transitional accommodation (shelters and refuges). Universal and targeted prevention for cohorts at elevated risk, being further outside the traditional housing and homelessness domains, are underdeveloped and where the National Plan needs to establish a strong presence.

In addition to reduced costs in the long term, investment in homelessness prevention would also prevent the suffering to individuals and families who would otherwise experience homelessness. Over time, a systems approach to housing and homelessness needs to be built on a shift away from crisis responses and towards prevention responses.

ACTIONS

- 1.1. All governments agree that the National Plan and the next National Housing and Homelessness Agreement (NHHA) will:
 - adopt a systems approach to ending homelessness;

that does not place them in housing stress; accessible (including for people with disability and to enable ageing in place); appropriate (including well-located and culturally-appropriate); and secure (providing stability through long-term tenancy agreements).

- be structured around a Homelessness Solutions Model Framework; and
 - base resource allocation around the principle of gradually shifting the homelessness services system, through a credible roadmap, away from its current state emphasis on crisis responses towards a more cost-effective emphasis on prevention.
- 1.2.** All governments commit to incorporate specific homelessness prevention and response actions into all other relevant policy settings, strategies and initiatives, including those for tax and transfer settings, income support, domestic and family violence, mental health, disability and youth.

Principles underpinning the system

A set of guiding principles should inform the National Plan, underpinning the development of a systems approach that would see everyone have access to housing and to any support that they need to maintain that housing. These principles should be designed with people with lived experience of homelessness, homelessness researchers and representatives from the community sector. As a starting point the Principles may include:

- Everyone has the right to a safe and secure home.
- Anyone who needs support to stay housed should be able to access that support, for as long as they need it, by their own choice and without the threat of having their housing removed based on any decisions they make about support access.
- The provision of a home should not be contingent on people’s progress towards an arbitrary goal of ‘readiness’, that is, people should not have to demonstrate that their mental health, substance use or other circumstances are congruent with maintaining housing.
- People should not have to cycle through short-term accommodation options as a stepping stone to permanent housing.
- Social and community inclusion is a vital part of housing support.
- People with lived experience of homelessness and housing precarity should be involved in co-designing all aspects of a systems approach to housing and homelessness.

These principles are aligned with what are elsewhere described as ‘Housing First’ principles.^c

^c We note that the term ‘Housing First’ can be used in a number of ways and that in practice in Australia it is generally applied to a set of principles that are broadly aligned with those listed here. However, the original use of the term refers to a certain therapeutic model of permanent supportive housing, with a highly prescriptive model design, based on the Pathways to Housing model developed in New York in the 1990s. We reserve the use of the term ‘Housing First’ to refer to that specific model of permanent supportive housing – see the section on Models of housing plus support.

ACTIONS

- 1.3. All governments commit to a set of principles to underpin the systems approach to ending homelessness following a consultation period with people with lived experience of homelessness, homelessness researchers and representatives from the community sector.

Greater investment in housing and homelessness

The approximately \$1.6 billion Federal contribution each year to housing and homelessness funding is severely inadequate to achieve real progress. Several State and Territory governments in their submission to the 2020 Federal Parliamentary Inquiry into Homelessness in Australia raised the critical need for more investment. They noted that the NHHA funding does not: increase in real terms to meet demand or improve outcomes; support effective action to reduce homelessness; increase social housing supply; provide comprehensive social housing tenancy support; or affect housing affordability more broadly.¹²

While the Homelessness Solutions Model Framework and associated Resource Allocation Model are still under development, there are other considerations that should direct funding for homelessness service provision in the meantime. These include covering Equal Remuneration Order (ERO) fundings in base grant funding, ensuring that indexation keeps up with inflation, and developing a needs-based homelessness funding model that takes account of varying need across jurisdictions.

Equal Remuneration Order (ERO) Federal supplement in base funding

Part of funding the delivery of housing and homelessness services is sufficiently covering the remuneration of a highly skilled frontline workforce. The ERO Federal supplement in the NHHA is critical to help progressively meet the 45% increase in wages that was decided by the Fair Work Commission in the Social, Community and Disability Services Industry Equal Remuneration Order 2012. As recommended by the Productivity Commission, this needs to be an ongoing payment, as it reflects the true staffing cost involved with service delivery and must be incorporated in future base grant funding.

Indexation

As for all community services, indexation for homelessness support services must be adequate. A consistent indexation policy that matches actual costs is needed. Contracts that do not reflect actual CPI increases throughout their periods have the effect of reducing the real value of the grant during its term, diluting actual service delivery outcomes or making it impossible to deliver activities such as evaluations.

Needs-based homelessness funding

Mission Australia strongly supports the recommendations made in the *Final report Inquiry into homelessness in Australia* by the House of Representatives Standing Committee on Social Policy and Legal Affairs¹³ and by the Productivity Commission¹⁴ that a needs-based funding methodology be applied to the next NHHA. The adoption of a needs-based funding model should be uncapped.

The current funding formula used for the NHHA is based on each jurisdiction's share of the national population, as recorded in the 2006 Census, for allocating the general funding amount and the share of total homelessness funding amount. This methodology fails to consider the relative needs of the states and territories, such as entrenched levels of homelessness, poverty rates, and the demand and costs for services across different geographies.¹⁵ The Northern Territory is grossly disadvantaged by this arrangement as articulated further in NT Shelter's submission to the National Plan, which Mission Australia supports.

A more thorough needs-based funding formula should be adopted, which should draw on multi-source data about the characteristics of the homeless and at-risk population, as well as homelessness cost drivers, unmet need and risk factors to approximate equitable jurisdiction level allocations centred on people's real need.

Data to be included in the formula to determine funding allocations under a new NHHA would include:

- the Australian Bureau of Statistics (ABS) homeless count;
- the Australian Institute for Health and Welfare Specialist Homelessness Services Collection (SHSC) – which gives a good indication of current trends including changing demographics within the services and emerging need;
- data about factors driving homelessness including but not limited to:
 - prevalence of financial insecurity / poverty;
 - domestic and family violence rates;
 - rental affordability indexes; and
- the rich evidence base on various cohorts which should be used to inform the weightings for service intensity.¹⁶

Some State and Territory governments are experienced with the development and application of funding formulae for a range of their funded services, including homelessness services, and will be well-placed to inform the creation of a robust formula at the national level.

ACTIONS

- 1.4. All governments agree to distribute the NHHA funds according to needs-based funding model for future NHHA agreements, calculated with multi-source data about the characteristics of the homeless and at-risk populations, as well as homelessness cost

drivers, unmet need and risk factors to approximate equitable jurisdiction-level allocations centred on people's real need.

Creating a sustainable social and affordable housing system

The full cost of providing social housing is nowhere close to being covered by the funding from the NHHA, Commonwealth Rent Assistance (CRA) for some classes of social housing, the additional funding from State and Territory governments and the rental income from tenants. This leaves both Public Housing Authorities and Community Housing Providers (CHPs) with a funding 'gap' that threatens the sustainability of the system. Failure to address this gap and arrest its effects will further diminish the standard of existing social housing and the growth of new social housing. It will also erode the benefit of prior investment, and mean that existing and increasing demand through population growth and broader housing unaffordability is never met.¹⁷ It is therefore critical that the Federal Government along with State and Territory governments investigate as a matter of urgency both direct and indirect investment options as a way to sufficiently fund the social housing system. This has the added advantage of facilitating the delivery of the Housing Accord that aims to deliver 1.2 million homes over five years.

Filling the funding gap for the community housing sector

Mission Australia acknowledges the important role of the National Housing Finance and Investment Corporation (NHFIC), now rebadged as Housing Australia, in assisting CHPs to deliver social housing. But we note in the 2021 statutory review of NHFIC that, *"operations must be supported by other forms of government subsidy, whether at the Commonwealth, State or Territory or local government level, as well as renewed interest and innovation from the private sector."*¹⁸

Since the review, positive steps have been taken, with the National Housing Infrastructure Facility being permitted to provide concessional loans and grants for social and affordable housing, and Government efforts to attract large institutional investment with the right incentives. However, this is not enough to release the handbrake on CHPs' capacity to contribute more substantially and quickly to increasing the supply of social and affordable housing.

The \$10 billion Housing Australia Future Fund is a very welcome foundation, but insufficient to deliver the targeted 30,000 social and affordable dwellings let alone be a sustainable funding source for the almost 1 million needed in the next 20 years to meet current and future demand. The National Plan must look to grants, subsidy streams and mechanisms to leverage private investment, especially from institutional finance, to fund the housing stock required.

One of the consequences of social housing only being marginally sustainable for CHPs is that it creates disincentives to CHPs to provide more costly forms of supported housing to people most in need. The disincentive is even greater to provide housing for young people at risk of homelessness, given young people receive a very low level of income support (and therefore pay less rent) and also receive less

CRA. Rational decision-making by CHPs to limit the amount of cross-subsidised supported housing they provide unfortunately results in capable providers not being able to service many who are most in need of housing and support. Providing adequate levels of income support and increasing CRA as recommended in this submission are critical to enabling CHPs to house more people in supported accommodation, including more young people.

Transfer stock from public housing to community housing

Mission Australia supports continuing the NHA policy position of stock transfers and advocates a move to a wholesale transfer over time to the community housing sector. While this has erroneously been labelled privatisation by some, devolution of social housing management to not-for-profit CHPs and Aboriginal CHPs in practice enables greater flexibility to respond to tenant needs and local community contexts, and increases resident wellbeing and community development activities. For example, while public housing tenancy management staff typically try to look after 500 properties, CHP staff typically tend a portfolio of 250 properties and households.

In implementing stock transfer policy, governments must negotiate reasonable terms of transfers with CHPs and Aboriginal CHPs, specifically covering the high maintenance and redevelopment costs of transferred aged and unfit-for-purpose properties.

Since the mid-1990s, there has been a steady transfer of stock to the not-for-profit community housing sector, with transfers of management over title strongly favoured by State and Territory governments.¹⁹ While the community housing sector in general advocates for title transfer due to its perceived financing advantages, Mission Australia views management transfers, if negotiated fairly, to be similarly beneficial.

The wholesale transfers of public housing to CHPs will have a flow-on impact on the size of the CRA allocation. This is one factor to be included in the Productivity Commission's review of CRA, as recommended in this submission.

Erase the remaining State and Territory housing debt

Historical housing debt to the Federal Government remains an impediment to investment in social housing. Prior to the Tasmanian Government's debt being waived in 2019 upon the condition to redirect scheduled repayments to housing and homelessness programs, for every dollar it received through the NHA, half was to be paid back in debt.²⁰ This debt waiver arrangement should be offered to all States and Territories to free up additional housing and homelessness investment.

ACTIONS

- 1.5. All governments investigate as a matter of urgency both direct and indirect investment options as a way to sufficiently fund the growth and maintenance of the social housing system, including capital grants, stock transfers and erasing State and Territory housing debt.

Adoption of strategic commissioning approaches with a five-year funding horizon for service contracts

Strategic commissioning approaches can advance service users' agency in service design and delivery, in particular through co-design and/or co-production to enable user voice to be reflected in need identification, outcome articulation and service design. It can also enable service providers to tailor service delivery to individual users' specific circumstances, needs and aspirations. In Mission Australia's experience, inflexible contracting is often a barrier to effective responses to users, while greater contractual ability to individualise responses produces better outcomes.

Effective strategic commissioning includes the consideration and application of various procurement methods and contract terms that are fit for purpose. Mission Australia strongly recommends a shift to long-term funding contracts to more effectively support organisations to develop and deliver services for individuals, families and communities experiencing disadvantage. Often programs and initiatives are funded on a short-term basis and, while many still produce positive outcomes, it may not result in lasting changes due to discontinued funding, or ad hoc extensions for as short as six to 12 months. This funding environment is detrimental to service delivery with implications for retaining/hiring qualified staff and continuity of care for clients. It is also highly inefficient, with avoidable waste of taxpayer funds in high frequency contract "churn" incurred by both government agencies and providers.

ACTIONS

- 1.6. All governments implement a commissioning approach and guarantee long-term investment in services with a minimum of five-year funding contracts, to maximise efficiency, realise the full benefits of programs and give service users and frontline workers greater certainty.

Care sector growth and implications for services and workforce

Homelessness services are under increasing pressure, with a combination of rising demand, staff shortages and inadequate funding creating an unsustainable system. This is reflected in trends across the entire care sector, which is growing rapidly and requires a pipeline of skilled workers. To enable the development of this pipeline, the value of the social sector must be recognised as an essential and attractive place for people to work and build a career.

The homelessness sector workforce must also be assisted to be strong, skilled, supported, and equipped to manage the shift from a crisis to a prevention approach. A national homelessness workforce strategy would require:

- funding to develop a workforce that is capable, effective, evidence-based, client-centred, trauma-informed, safe, and reflective of the diversity of the communities in which we work; and
- a plan for attracting, recruiting, and retaining skilled workers, and developing robust planning, mentoring, and leadership opportunities.

A national homelessness workforce strategy would be complemented by relevant directions and initiatives set out in the Working Future: The Australian Government’s White Paper on Jobs and Opportunities. These include the creation of TAFE Centres of Excellence and Higher and Degree Level Apprenticeships; lessening the financial burden on tertiary level student practice placements; making the migration system more responsive to core skills shortages; and lifting pay and conditions to reflect the value of care and support work. Mission Australia also recognises work is being undertaken by the Care and Support Economy Taskforce which, while focusing on care sectors outside of the specialist homelessness system, may point the way for future action.

ACTIONS

- 1.7. The Federal Government invest in a national homelessness sector and workforce capability program that will support high-quality evidence-based practice and the shift to a prevention approach.

A dedicated First Nations Housing and Homelessness Plan

Aboriginal and Torres Strait Islander peoples are vastly and unacceptably overrepresented among those who are homeless or at risk of homelessness. Two underlying drivers of this are structural racism in housing markets and the lack of self-determination for Aboriginal and Torres Strait Islander people to design, control and choose their own housing.

Mission Australia believes that policy and program settings affecting the housing and homelessness outcomes of Aboriginal and Torres Strait Islander people should be developed by First Nations peoples and their organisations, and would benefit from a dedicated plan. This would necessarily be complementary with the National Plan, and link into and support work on the Closing the Gap target (9) that ‘People can secure appropriate, affordable housing that is aligned with their priorities and need’. Accordingly, we urge the Department of Social Services to take direction from the submissions of First Nations peoples and organisations.

We note the Canadian experience in which the benefits of Federal government leadership were a large factor in the success of the country’s First Nations housing schemes, with sustained leadership and funding contributing to stability and development of the Aboriginal-controlled sector and leading to positive outcomes in health and wellbeing, social and economic domains for tenants.²¹

A standalone Plan to address Housing and Homelessness for Aboriginal and Torres Strait Islander communities must necessarily engage with the National Aboriginal and Torres Strait Islander Housing Association (NATSIHA), the relevant jurisdictional community-controlled housing peak organisations and the Coalition of Peaks for advice on broader social determinants of homelessness.

ACTIONS

- 1.8. All governments agree to the co-development, alongside First Nations housing and homelessness organisations, experts and communities, of a specific First Nations Housing and Homelessness Plan, which takes a systems approach to the interlinked issues of inadequate housing, homelessness and other forms of disadvantage, through the Closing the Gap framework.

Addressing community attitudes towards housing and homelessness

Homelessness and a lack of affordable housing are not solely political problems: they are societal problems. What we accept as a society will help to set the parameters for government action.

To that end, the National Plan should include an awareness campaign both to educate the community and mainstream service providers about homelessness and to build support for the bold actions that need to be implemented.

Breaking misconceptions and destigmatising

For many people in the community, homelessness is thought of in the abstract and is still wrongly imagined as people living rough on the streets. Broadening and deepening the public understanding to the multiple pathways and reasons people end up homeless, and what that lived reality looks like – including couch surfing, sleeping in a car, frequently moving between multiple temporary lodgings, living in severely overcrowded places – will help foster awareness and support for proportionate solutions.

Breaking misconceptions will also help fight the stigma people face when dealing with homelessness and trying to recover. Multiple studies have found a correlation between stigma related to homelessness and poor physical and mental health, as well as experience of significant stigma from providers when accessing services such as health care.²²

Building community acceptance for 'yes, in my backyard'

Social and affordable housing developments often face strong local community opposition based on stigma and fear, alongside general anti-development sentiment. Mission Australia and other public and NGO providers have experienced this difficulty, with local opposition to planning proposals for new

homelessness services and social housing developments. If the actions proposed in this submission to significantly boost housing supply, especially social and affordable housing, are to reach the scale and speed of delivery that is required, community attitudes need to turn from opposition to welcoming of diverse housing types and residents within neighbourhoods.

Change management approach

A change management approach can be adopted, targeting formal community leaders (such as council staff and elected councillors), informal community influencers, as well as the general public. An aspect of the campaign would focus on urban change – a growing city, need for more affordable housing and the benefits this gives to individuals and whole of community – and would follow an initial phase of awareness raising, then followed by knowledge/ownership building of the implementation of solutions.

ACTIONS

- 1.9. The Federal Government launch an awareness campaign both to educate the community and mainstream service providers about homelessness and to help build support for strong action to end homelessness and provide everyone with a safe home.

2. Deliver affordable permanent housing for all

The wellbeing of society is dependent on safe, secure and affordable housing for everyone. Having a home is critical for people's mental and physical health, their education and employment prospects, and their ability to meaningfully participate in the community. The availability of affordable housing is a major structural driver of homelessness²³ and having a sufficient supply is a key universal homelessness prevention measure.

The housing system is complex: high property prices put pressure on rental markets, which in turn puts pressure on the limited non-market housing stock (social and affordable housing) and the homelessness system. The National Plan must consider these interactions in the system in its policy directions. Bold action must be taken to influence the supply of affordable homes for households across all incomes, but especially those struggling on very low to moderate incomes.

Significantly increase social and affordable housing stock

For people facing disadvantage and at risk of homelessness, or already experiencing homelessness, the need for social and affordable housing is critical. Social and affordable housing is a necessary piece of social infrastructure in Australia that serves both a social and economic purpose and contributes to the effective functioning of society.²⁴

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.²⁵

Mission Australia recommends that further investment in social and affordable housing be made to meet current and future needs, noting that while the current commitment under the Housing Australia Future Fund stands at 30,000 homes over five years, the shortfall has been projected as 940,000 homes over 20 years.²⁶

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,^d which is discussed further in the **Preventing entry to crisis situations** section of this submission. 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.

However, some young people, often those aged between 16 and 24, want and are able to live in a semi-independent housing setting, rather than with a foster family or in a residential OOHC setting. The cohort of OOHC leavers are at particularly high risk of homelessness and special attention must be paid to exiting-care policies and practices as a homelessness prevention measure.

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.²⁷ 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

^d See further: <https://www.dss.gov.au/families-and-children-programs-services/reconnect>

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 models with on-site therapeutic support should be co-designed to meet their needs.²⁸ The NSW Premier's Youth Initiative²⁹³⁰ 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.³¹

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 models^e 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.³²

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 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

^e Permanent 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. That is, Housing First models are a subset of this group.

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 are detailed in the attached Homelessness Solutions Model Framework discussion paper and include the following:

Michael's Intensive Supported Housing Accord (MISHA) ³³

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.

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.

ACTIONS

- 2.1. All governments deliver enough social and affordable housing to meet the projected demand over 20 years, including targeted funding for co-designing, replicating and scaling up of housing and support models that are effective for at-risk groups.
- 2.2. The Federal Government should commit to funding for different housing plus support models – specifically including Youth Foyers and permanent supportive housing models.

Tax reform

The National Plan cannot avoid investigating the adjustment of tax settings to eliminate adverse impacts on housing and homelessness outcomes. Negative gearing, the capital gains tax discount and other tax concessions put in place by the Federal Government prioritise and incentivise housing as a speculative investment vehicle, and work counter to a housing system that should have the primary objective of providing everyone with a safe and affordable home.

Tax breaks provided to property investors come at an annual cost of \$11.7 billion to government revenue.³⁴ On that basis alone, it is prudent to examine the effectiveness of this intervention into the housing system in terms of its effect on housing supply and affordability, and the conditions it creates for market participants, particularly young and first-time homeowners. All Federal and State/Territory tax settings impacting the housing system need to be modelled and analysed as part of any tax reform process and revenue gains should be directed to social and affordable housing.

Homestay tax concessions

There may be scope to use tax concessions to encourage take up of homestay arrangements^f more broadly for anyone looking for medium to long-term accommodation in desirable locations.

Around 7.4 million households have more bedrooms than they need for typical sleeping arrangements, resulting in 13 million bedrooms being unused.³⁵ Not all these households would be suitable for homestay, but encouraging people in ideal situations, for example a single pensioner in a large house, could be assisted by excluding rental income from overall taxable income below a certain threshold.

ACTIONS

- 2.3. The Federal Treasurer direct the Productivity Commission to model and analyse all Federal and State/Territory tax settings impacting the housing market and provide any recommendations that will increase supply and affordability of homes to rent and buy.

Review the adequacy of private rental market subsidies

As a consequence of the falling rate of home ownership, the private rental market must attempt to accommodate aspirational homeowners for longer periods, alongside renters who have given up on owning a home, and others who never planned to buy. Most of these renters are in housing stress. The latest 2023 data reveals median income households are paying on average almost one-third of their income to service a new lease, which then jumps to over half for lower-income households.³⁶

This hostile rental market is keenly felt by renters on Youth Allowance who typically, after paying rent on an average two bedroom flat, are left with an average of \$13 a day to cover all other costs.³⁷ Another at-risk group is older, single women who are asset poor and entirely reliant on income support and supplements, and who contend with discrimination and lack of suitable rental dwellings.³⁸

In the medium term, the National Plan must commit the Federal Treasurer to direct the Productivity Commission to undertake a comprehensive review of private rental subsidy programs including CRA and State/Territory schemes. In the meantime, the assistance available to renters in housing stress must be boosted and National Cabinet's *A Better Deal for Renters* initiative must be operationalised, to deal with the current housing emergency which is placing so many renters at risk of homelessness.

Commonwealth Rent Assistance

Over 40% of low-income households were in housing stress and at risk of being pushed into homelessness in 2021-22, despite receiving CRA. The Productivity Commission has called for a CRA

^f Homestay programs are traditionally designed for international students to find low-cost accommodation (sometimes with meals provided). It is a well-established practice across many countries and emerged in Australia as a response to the growing number of international students and meeting their accommodation needs.

review that would cover all aspects of the payment design (including minimum and maximum rates, the co-payment rate, indexation, income tapering and eligibility) with the aim of improving the sufficiency, fairness and effectiveness of the payment.

The Commission found CRA's capacity to shield renters against rent shocks has deteriorated — 79% of recipients paid enough rent to receive the maximum CRA payment in June 2022, so their payment does not increase if their rent rises. There is also evidence that some payments are not targeted to people in greatest need, and some people in similar circumstances might be treated differently because of their eligibility for income support.³⁹

The recently announced 15% increase to CRA in the 2023 Federal Budget was welcome but is insufficient in the face of significant and frequent rent increases. The 15% CRA increase adds only \$15.50 per week to the maximum CRA rate – around one tenth of the median rental cost increase over the past two years.⁴⁰ The CRA rate should be topped up to make a total 50% increase to provide substantive relief while awaiting the CRA review.

See further:

- The Productivity Commission review of the NHHHA that includes commentary and recommendations for CRA, www.pc.gov.au/inquiries/completed/housing-homelessness/report/housing-homelessness.pdf, p.295.

Targeted private rental assistance for those most vulnerable

Given the lack of social and affordable housing, many people who would otherwise be eligible for non-market housing are left highly vulnerable. To better assist these people to sustain tenancies and avoid homelessness, we recommend that State and Territory governments strengthen their approach to subsidising private rental marketplaces for people on low incomes, such as by adopting a model similar to NSW's Rent Choice.

This would be a medium-term measure while the Productivity Commission is undertaking its recommended comprehensive review of all Federal- and State/Territory-funded private rental subsidy programs.

Tailored support should be available to young private renters who need it, in recognition of the challenges involved in their transition to independence with often limited financial means due to pre-employment or limited work experience or capacity. Products like Rent Choice Youth in NSW provide a model that could be adapted in other jurisdictions.

Greater protection for renters

Mission Australia endorsed the recent submission prepared by the National Association of Renters' Organisations, National Shelter, Better Renting and Everybody's Home to the Australian Senate Inquiry

into the Worsening Rental Crisis in Australia. The reform directions called for in the submission should be taken up in the National Plan. These include:

- greater stability and security for people who rent their homes (e.g., protections against no-cause evictions, requiring landlords to provide renters with a valid reason for terminating a tenancy);
- stronger protections and fair limits on rent increases;
- safe and healthy homes for renters (e.g., basic energy efficiency standards, access to an affordable energy supply, the right to modify to meet accessibility needs);
- better enforcement, oversight, and accountability so that compliance is the norm; and
- access to free advice, assistance and advocacy.

This would help operationalise the positive steps flagged in the *A Better Deal for Renters* initiative which has no timeline for change, and allow for strengthening of measures, such as making sure rent increases that will be limited to once a year are safeguarded from unfair increases.

See further:

- National 9 Principles for Strengthening Renters' Rights by the National Association of Renters' Organisations, www.tenants.org.au/reports/national-nine.
- Joint sector letter to the Inquiry into the Worsening Rental Crisis in Australia, www.apf.gov.au/DocumentStore.ashx?id=371e7bc1-3f21-43ed-8d94-cea6acee563f&subId=746261.

ACTIONS

- 2.4.** The Federal Treasurer direct the Productivity Commission to undertake a comprehensive review of rental subsidy programs including CRA and State/Territory schemes and, until its recommendations are implemented:
 - the Federal Government provide an immediate interim increase to CRA by 50%
 - all State and Territory governments commit to delivering adequate private rental financial assistance schemes.
- 2.5.** National Cabinet build on and operationalise its *A Better Deal for Renters* initiative with reference to reforms called for by the National Association of Renters' Organisations, National Shelter, Better Renting and Everybody's Home.

Target homeownership support to lower income households

Driven by factors such as the price of housing, changing household demographics and population increases, the rate of homeownership is declining.⁴¹ It is appropriate that governments address this

issue but, as recommended by the Productivity Commission, support into home ownership should be tightly targeted to lower income households and use criteria such as income testing.

Current homebuyer policies are wasteful of scarce taxpayer funds. Over ten years to 2021, more than \$20.5 billion was given to first homebuyers by Australian governments in the form of stamp-duty concessions and cash grants. They mostly go to middle-income households to buy more quickly than they otherwise would, as opposed to widening ownership to lower-income households (such as key workers).⁴² This type of government intervention raises serious equity concerns, as well as value for money concerns in achieving national housing outcomes. If the \$20.5 billion had been redirected into non-inflationary housing measures, it could have funded 137,000 shared-equity homes, or 60,000 social homes.⁴³

Existing initiatives directed to people locked out of private financing can provide directions for how to reach more people who would benefit. The Indigenous Home Ownership Program (IHOP) delivered through Indigenous Business Australia, contributed 11.6% to the increase in the national home ownership participation rate for Aboriginal and Torres Strait Islander people from 2006 to 2011.⁴⁴ The loans offered through IBA are different from mainstream finance due to a lower deposit requirement, a longer standard loan term and a lower interest rate offering. IHOP demonstrates the value of such programs geared towards people who aspire to own a home but are locked out of conventional homeownership pathways.

ACTIONS

- 2.6. All governments, through the Council on Federal Financial Relations, agree to coordinate first homebuyer support programs, target them towards lower income households and ensure they contain non-inflationary measures.

National Planning Reform Blueprint

The National Plan is the logical vehicle to incorporate and oversee the National Planning Reform Blueprint agreed to by National Cabinet. The Reform Blueprint's high-level undertakings agreed to by National Cabinet should ideally be fleshed out in line with the policy direction and intentions of the National Plan.

Prioritise social and affordable housing as essential infrastructure

The challenge of gaining approval for social and affordable housing development applications needs to be recognised and addressed. Given the urgency of delivering the Federal Government's and many State/Territory governments' housing supply agendas, these development applications should be designated as critically important social infrastructure and, where possible, improvements be made to their assessment processes and timeframes, coordination between stakeholders, and transparency and certainty.

Planning powers that were introduced by State and Territory governments to support the delivery of the former National Rental Affordability Scheme (NRAS), and which some jurisdictions may still have in place, provide a guide for ensuring these development applications are treated with priority.

A National Framework for Mandatory Inclusionary Zoning

The Constellation Project has developed a National Framework for the implementation of Mandatory Inclusionary Zoning (MIZ)[§] which would allow for the introduction of a consistent and clear policy, ensuring greater certainty of supply and transparency for key stakeholders across the Australian housing system.

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 NHHA and National Housing 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 collaboration with over 60 individuals including those 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 draft is being refined with major developers. Further detail is provided in The Constellation Project submission to the National Plan.

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.

Facilitate more medium-density housing

Among the undertakings in the National Planning Reform Blueprint is, *“promoting medium and high-density housing in well located areas close to existing public transport connections, amenities and employment”*.

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

[§] MIZ occurs when a specified affordable housing contribution is required as a condition for development consent on a market housing (or other) project.

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.

Support emerging housing models

Planning systems need to support emerging housing typologies to meet the diverse needs of individuals and communities. This includes co-housing models, medium-sized new generation boarding houses with support, and co-designed models for particular at-risk of homelessness groups such as Aboriginal people and young people.

ACTIONS

2.7. National Cabinet, through the National Planning Reform Blueprint:

- facilitate more medium-density housing in established “middle ring” suburbs;
- fast-track social and affordable housing development applications;
- adopt a National Mandatory Inclusionary Zoning Framework; and
- increase flexibility for emergent housing models such as co-housing.

3. Boost homelessness prevention measures

The spectrum of homelessness prevention measures spans: universal measures which address societal drivers of homelessness; targeted prevention measures for groups with elevated homelessness risk; and responses that prevent entry to housing crisis/homelessness.

Universal prevention measures

There is increasing recognition of the importance of universal prevention measures that address societal drivers of homelessness and several recent attempts to quantify their impacts. The two primary societal drivers of homelessness have been identified as poverty - or strength of welfare systems - and the availability of sufficient affordable housing stock, while others include levels of violence, access to healthcare and childcare, and conditions at the lower end of the labour market.⁴⁵

Countries with robust poverty-reduction measures have lower levels of homelessness, and homelessness is determined by housing market conditions⁴⁶ including, in Australia, the availability of public housing which is a strong protective factor against homelessness.⁴⁷

Affordable permanent housing has been addressed in the preceding section of our submission and will be a central feature of the National Plan. Poverty reduction measures, sitting outside the direct housing and homelessness system, have not historically been integrated into counter-homelessness measures. The National Plan represents a new opportunity to explicitly recruit poverty reduction measures to the task of ending homelessness.

Data analysis of the financial hardship of people on working-age income support payments and parenting payments, measured using welfare system data, found it to be a strong indicator of future homelessness support need; people on those payments are 10 times more likely to need support compared to the broader population.⁴⁸

The findings of a September 2023 survey of 270 people living on JobSeeker payments, Youth Allowance, Parenting Payment, Austudy, Abstudy or Special Benefit found that 94% of private renters experienced rental stress.⁴⁹

It is vital that over the long term the Federal Government pursues an end-poverty strategy that includes raising income support payments to a level that will keep people out of poverty.^h The benefits of ending poverty will be manifold and, research tells us, will include reducing homelessness.

^h Mission Australia is a strong supporter of the Raise the Rate campaign that calls for lifting income support payments to a level that keeps people out of poverty.

The effectiveness of social support strategies, particularly those aimed at strengthening support for families and children; preventing gendered and family violence; reducing discrimination; justice reinvestment and crime prevention will also significantly impact on homelessness.

ACTIONS

- 3.1. The Federal Government lift income support payments to at least \$78 a day to keep people who are in need out of poverty and out of homelessness risk.

A Prevention Transformation Fund

Over the short term, the first step in shifting to an end homelessness strategy should be to establish a \$500 million Prevention Transformation Fund. This would establish a ringfenced funding stream, over and above current homelessness expenditure, through the next NHHHA.

The evidence base on homelessness prevention in Australia is still being built. Nevertheless, our first round of analysis for the Homelessness Solutions Model Framework, coupled with emerging international evidence on the success of universal and early-stage prevention measures and evidence from experienced practitioners in the field, indicates that we can be confident in concluding that:

- effective and cost-effective measures are available to prevent homelessness; and
- deeper investment in homelessness prevention would constitute an effective and cost-effective systemic approach to resolving the current homelessness situation.

Homelessness prevention measures in Australia at present (excepting universal policy settings such as income support) are disparate and uncoordinated. Direct homelessness prevention measures, such as programs for people leaving institutional care and tenancy sustainment programs, are patchily funded and delivered across Australia, leaving a significant gap in demand. The lack of a clear, coordinated and effective homelessness prevention effort is evident in the continuing high rates of homelessness and risk of homelessness across the country.

While rates of homelessness remain persistently high and the housing emergency continues, investment must continue in homelessness crisis measures (discussed in section 4 of this submission). There is no other choice for a system already struggling to meet demand for its services.

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 specialist homelessness services system becomes increasingly residual as the only experiences of homelessness are rare, brief and non-recurring.

The Prevention Transformation Fund would direct resources to measures including:

- targeted prevention programs for groups with elevated homelessness risk, including:
 - women and children experiencing family and domestic violence;

- unaccompanied children who experience homelessness largely as a result of family and domestic violence in the family home; and
- young people experiencing family violence or conflict that may lead them to leave home (as currently addressed by the Reconnect program).
- policy reforms that prevent homelessness for groups with elevated homelessness risk, including exit planning and housing assistance for people leaving institutions such as correctional facilities, out-of-home care and health facilities; and
- other supporting measures needed to shift to a prevention approach such as workforce training.

The scope of the Prevention Transformation Fund will cover the domains and measures further described in the rest of this section of our submission.

ACTIONS

- 3.2. The Federal Government commit to the establishment of a \$500 million dedicated Prevention Transformation Fund in the National Plan; and all governments should negotiate the inclusion of this Fund in the next NHHA, to commence in July 2024.
- 3.3. The Federal and State/Territory governments should negotiate the inclusion of relevant prevention outcomes in the NHHA.

Responses targeting cohorts with elevated risk of homelessness

Targeted or upstream measures focus on groups known to be at elevated risk of homelessness, including people leaving various forms of institutional care, and young people at risk of education and other forms of disengagement. They involve action from outside the specialist homelessness system and as such require much more coordinated arrangements between various elements of the human services system.

There is emerging evidence for the effectiveness of these interventions, but in Australia they remain small-scale and patchy. The most strongly-evidenced model for reducing post-institutional homelessness is Critical Time Interventions, which typically provide case management support to an individual for nine months, offering continuity of care from within the institution to community-based support and with an emphasis on rebuilding supportive social networks.⁵⁰ For example, the Ruah Critical Time Intervention-Intensive Housing Support Program (2010-2013) program enrolled 121 people with severe mental illness and at risk for homelessness when they were discharged from mental health inpatient units in Perth. Seventy-three percent remained in stable housing for at least 12 months after discharge, among a cohort that had struggled with unstable housing for many years.⁵¹

Evaluations of other targeted Australian programs indicate that support for young people leaving juvenile justice⁵² and out-of-home care⁵³ provide a range of benefits, although housing outcomes are limited by the availability of affordable and appropriate accommodation.

Responsive mainstream services

Targeted interventions for cohorts at elevated risk of homelessness rely on elements of the human services system that sit outside housing and homelessness service provision. Specialist homelessness services cannot deliver the entire homelessness response. Accordingly, the National Plan must seize the opportunity to recast the interface between homelessness and mainstream or other community-based services.

Duty to assist

Wales and Scotland have introduced a legal duty to assist for public officials, which creates an active responsibility to identify people who are homeless or at risk of homelessness and assist them to access available support.

A similar duty should be implemented as part of the National Plan and supported by legislation. This would create a requirement for public services to make enquiries about people's housing situation, make appropriate referrals, and provide timely support to prevent homelessness.

Systematic screening for homelessness

Systematic screening for homelessness risk by non-housing and non-homelessness services would enable the early identification of people who could be assisted to keep their housing or quickly find new housing. This could range from advice and/or referral to more comprehensive interventions such as exit planning. This is particularly effective for groups at elevated risk of homelessness in contact with mainstream services, such as: students who are disengaging with education within schools, which is often an indicator of family conflict; people staying in hospitals, corrections facilities and other residential settings; and young people preparing to leave out-of-home care.

At a minimum, mainstream services should:

- screen all clients to assess for risk of homelessness;
- seek to prevent homelessness by use of assistance and brokerage funding; and
- refer to an SHS when necessary for assistance into permanent housing or, if necessary, crisis accommodation.⁵⁴

This type of work can be informed by using and linking government administrative data as demonstrated by Their Futures Matters, a program of work in NSW aimed at improving the outcomes for children in care. One of the projects was the creation of a computer model of linked data on 2.3 million children in NSW over a 27 year period, and used machine learning to identify the combination of risk indicators leading to a pathway into care.⁵⁵ It is an example of the potential for data and machine learning to guide policy, programs and frontline practice in addressing risk factors.

A good example of screening in mainstream services is the Community of Schools and Services (COSS) model as set out below.

Community of Schools and Services model (COSS)

The Community of Schools and Services (COSS) model is an effective early identification model for young people at risk of or experiencing homelessness. The Geelong Project, the original exemplar of the COSS model, aims to reduce youth homelessness and educational disengagement by building capacity and resilience, ensuring safe and supportive environments, maintaining positive engagement with education, and connecting young people and families to their community. This is achieved through the universal screening of young people and the provision of support to schools, young people, and their families through a collaborative network of the partners.

Between 2013 and 2016, the number of adolescents entering the SHS system in Geelong declined by 40%. Universal risk screening has also been successfully piloted in secondary schools in Albury, Penrith and Mount Druitt since 2019.⁵⁶

Joined-up service responses

At Mission Australia, we know there are many examples of the health, education and justice systems linking up with community services such as the youth homelessness program Reconnect and SHS. An effective example of this is the co-location of mental health and AOD services at the Common Ground Camperdown residence. However, these linkages are typically confined to a local area or service and driven by personal relationships and goodwill. This is not an equitable way to do prevention work and is no substitute for a coordinated service system response backed by a strong policy imprimatur, resourcing and funding. Often, even when a person at risk is identified early, there are long waitlists for specialist services or no services to refer on to, which underscores the importance of adequately funding service systems.

Joined-up service responses can be facilitated by adopting commissioning approaches to services as already discussed under ***Adoption of strategic commissioning approaches with a five-year funding horizon for service contracts.***

Training and resources for mainstream services

Many mainstream service staff who come in direct contact with people at risk and experiencing homelessness do not have an understanding about local services that can help. People at risk or experiencing homelessness may also present themselves at generalist services that do not specialise in housing supports. Therefore, it is important that mainstream services are provided with training to work with and assist identified people by providing appropriate referrals, assistance with accessing crisis or emergency relief, and other supports.

Commitment to no exits into homelessness from institutional care

In 2021-22, around 6,000 people leaving institutional care settings received assistance from a specialist homelessness services agency.⁵⁷ These included health settings, prisons and detention centres as well as young people leaving care. The number of those who exited these settings into homelessness or insecure housing without seeking assistance from an SHS agency is unknown. Effective planning in advance can significantly contribute to preventing homelessness and other associated challenges.

A commitment should be made in the National Plan to prevent all exits from institutional care into homelessness. Existing policy documents such as the NSW Government's overarching framework setting out its approach to preventing homelessness among people leaving institutional care arrangements, the *No Exits from Government Services into Homelessness: A framework for multi-agency action*, could help to inform activities under this commitment. It is vital that this commitment be backed by the development of action plans and funding arrangements to support its implementation.

Focus on children and young people

We need to reduce risks for children and young people to prevent and break cycles of disadvantage. It is critical to invest early and substantially, to make sure children and young people remain engaged with education, and have the support and stability they need, whether that's at school or within the family environment. A large proportion of people who do become chronically homeless had their first experience of homelessness before the age of 18 years.⁵⁸ Studies have shown children who are homeless also have a high rate of disengaging from education.⁵⁹ This affects their ability to pursue higher education and limits future employment prospects.

It is important to point out that failure to invest will not save governments money. It simply shifts costs to vastly more expensive systems and interventions (e.g., child protection services, out-of-home care, legal and justice systems, hospitals, long-term welfare support), both in the immediate and long term.

ACTIONS

3.4. All governments agree to strengthening the role of mainstream services in delivering a holistic approach to ending homelessness. This should be supported by:

- a 'duty to assist' across universal welfare services to trigger public officials to screen for homelessness risk and activate supports and referrals, providing a joined up approach;
- local initiatives to join up support and implement a no wrong doors approach;
- training and resources for mainstream services;
- a commitment of no exits into homelessness.

3.5. All governments agree to prioritise the safety and stability of children and young people by boosting funding and availability of evidence-based child and family support services, youth services, specialised domestic and family violence services and school-based supports.

Responses that prevent entry to housing crisis/homelessness

Another type of prevention measure is responses targeted to people at foreseeable risk of homelessness that prevent them entering into housing crisis/homelessness, comprising:

- preventing entry to crisis situations - targeting those who are likely to experience homelessness in the foreseeable future, for example, people who are in significant rental arrears or who have received a warning from their housing provider (real estate agent or social landlord); and
- preventing entry to emergency situations - targeting those who are at imminent risk of homelessness, for example, those who have been served an eviction notice.

In practice there is often an overlap in these two approaches, particularly in tenancy sustainment programs where the difference between crisis and emergency prevention is mainly a temporal one: how close people are to homelessness when they are referred into the program.

Nonetheless, we maintain the distinction between crisis and emergency responses as they do involve separate activities and skill sets. Crisis prevention is focused on maintaining current tenancies with a longer timeframe to resolve issues, whereas emergency prevention is generally at the point where homelessness is almost inevitable and the focus shifts to rapid rehousing and quickly establishing new tenancies, ideally avoiding temporary accommodation settings such as shelters or refuges.

Preventing entry to crisis situations

Two of the key Australian programs in this domain are tenancy sustainment programs and the Reconnect program for children and young people aged 12 to 18.

Tenancy sustainment programs

Tenancy sustainment programs are an effective way to prevent people from entering homelessness crisis. For example, as part of the Toward Home Alliance in South Australia, the Toward Home: Prevent program provides tailored support coordination services to people living in the Adelaide CBD, Southern Adelaide and Adelaide Hills regions who are at risk of homelessness. Ninety-six percent of individuals who have received a service from Toward Home: Prevent have either remained in their current housing or been supported to access alternative housing.

Evaluations of other tenancy sustainment programs also show positive outcomes. An evaluation of the Sustaining Young People's Tenancies Initiative, providing mobile support to young people (16-25) after entering a social housing tenancy in Brisbane, found that 97% were living in secure and sustainable housing on program exit.⁶⁰ An evaluation of a floating support service for households at risk of eviction and homelessness due to anti-social behaviour in the UK found that 84% were no longer at risk of homelessness at program conclusion.⁶¹

Our indicative analysis of publicly available information (Table 2) shows that there are significant gaps across Australia in the availability of this type of support for most at-risk groups. These gaps should be verified and fixed in the National Plan through broadscale programs with full statewide coverage and,

where appropriate, place-based locally-driven programs for some locations such as discrete Aboriginal communities. There are many good examples of small-scale programs operated and funded by community services and community housing organisations which can provide best-practice insights. Nevertheless, these must be complemented by government coordination and funding to ensure equitable coverage for all people in need across housing tenures.

Table 2: Indicative provision of sustaining tenancy programs in Australia

STATEWIDE PROGRAMS		PUBLIC HOUSING	COMMUNITY HOUSING	ROOMING / BOARDING	PRIVATE RENTAL	HOME-OWNER
ACT	Generalist ◆ Supportive Tenancy Service	◆	◆	◆	◆	◆
Qld	Generalist ◆ Queensland Statewide Tenant Advice and Referral Service ◆ Skillsets for Successful Tenancies—Dollars and Sense	◆	◆	◆	◆ ◆	
NT	Intensive ◆ Public and remote housing tenancy support programs (◇ including for applicants on the waitlist)	◆			◇	
NSW	Generalist ◆ Tenants Advice & Advocacy Services	◆	◆	◆	◆	
	Intensive ◆ Sustaining Tenancies in Social Housing Program	◆	◆			
	Specialist ◆ Staying Home Leaving Violence	◆	◆		◆	◆
SA	Generalist ◆ RentRight SA	◆	◆	◆	◆	
Tas	Generalist ◆ Tenants’ Union of Tasmania	◆	◆	◆	◆	
	Intensive <i>The draft Tasmanian Housing Strategy signals intent to support at-risk groups with sustaining tenancies.</i>					
Vic	Generalist ◆ Tenancy Assistance and Advocacy Program			◆	◆	
	Intensive ◆ Tenancy Plus	◆	◆			

STATEWIDE PROGRAMS		PUBLIC HOUSING	COMMUNITY HOUSING	ROOMING / BOARDING	PRIVATE RENTAL	HOME-OWNER
WA	Generalist ◆ Tenancy Advice and Education Service	◆	◆	◆	◆	
	Intensive ◆ THRIVE ◇ <i>WA Housing strategy: By 2023, expand tenant support programs to social housing and private renters eligible for social housing</i>	◆	◇		◇	

Features of robust tenancy support for people at risk are: integrated service delivery; facilitation of access to appropriate housing and to support programs that address the underlying and often complex issues that can cause tenancy loss and/or homelessness risk; and provision of a collaborative, integrated, holistic service delivery approach that is tenant-driven, strengths-based and goal-focused.

Mission Australia’s Tailored Support Coordination Service (TSCS)

Mission Australia’s TSCS staff provide assistance to tenants and their household members, integrated with housing through Mission Australia Housing’s social and affordable housing properties, to enable them to sustain stable housing and to thrive.

While our residents represent a very broad group with diverse needs, increasingly many are facing significant vulnerabilities and life challenges. The level of support required to maintain stable housing and thrive will vary greatly between residents, and for the same residents over time.

By working in a person-centred and holistic way, we seek to deliver long-term outcomes for residents and the communities where they and we belong. This is achieved through meeting three objectives:

- **We provide a safe and stable home** – stability is a critical foundation for people to make positive changes in their lives and work towards goals in other domains (e.g., health, education and employment).
- **We equip people to thrive** – we assist residents to gain any needed skills, knowledge and support to sustain their tenancy and connect with their community.
- **We work to the strengthen the community** – we work collaboratively to build thriving, resilient, healthy, inclusive and connected communities, including by shaping an integrated and seamless local service system.

Reconnect

Reconnect is a vital response for young people at risk of homelessness, as it is the only large-scale youth homelessness program in Australia focussed on preventing homelessness. It has been funded by the Federal Government for over 25 years and is the only homelessness service they contract.

Mission Australia is the provider of seven Reconnect services in NSW, Queensland, South Australia and Western Australia, and assisted over 440 clients in the 2022-23 financial year. Our goal is to improve family relationships so each young person (12-18 years old) can return to the family home, if safe and appropriate. If this is not possible, the young person is supported to obtain alternative housing.

Data from our Impact Measurement program, collected to October 2023, demonstrated that young people surveyed when exiting Mission Australia's Reconnect services have, on average, higher wellbeing than those entering the program. Seventy-eight percent of young people who completed both entry and exit surveys had improved overall wellbeing when leaving the service. A review by Accenture has estimated that Foyer results in an overall per person benefit to government of \$90,042 in avoided costs over 40 years, and that the investment in Foyers is paid back within four years.⁶²

The Department of Social Services is planning to review the program in late 2023, and Mission Australia is ready to contribute to this as needed. Pending the findings of the review, we urge the Federal Government to ensure the continuity and growth of this type of service provision. We would strongly object to transferring the program to States and Territories as part of the National Plan or future NHHA without the funding being ringfenced for Reconnect or a similarly evidence-based prevention model for young people.

Preventing entry to emergency situations

Emergency prevention measures target those who are at imminent risk of homelessness, for example, those who have been served an eviction notice. They are aimed at diverting people away from temporary accommodation such as refuges, by rapidly housing/rehousing them in long-term accommodation. Preventing entry to homelessness emergency situations is complex and requires highly skilled staff.

An example of this type is the Entrypoint Outreach service in Western Australia, a free and voluntary assessment and referral service assisting people experiencing or at risk of homeless to access accommodation and support. A recent unpublished evaluation currently being finalised by the Centre for Social Impact at the University of Western Australia shows that it is effective in: transitioning newly homeless families into permanent private rental housing; providing skills, knowledge and confidence in relation to the housing market; and sustaining private rental tenancies at immediate risk of homelessness.

Missed prevention opportunities further upstream (in universal, targeted or crisis prevention) places great pressure on such services. While recommended increases in investment in those other prevention

measures are taking effect, these services need to be adequately resourced, as they play – and will continue to play – a vital role in ensuring that homelessness is rare, brief and non-recurring.

ACTIONS

- 3.6. All governments agree to include funding for crisis and emergency prevention programs for people at elevated risk of homelessness in the Prevention Transformation Fund.
- 3.7. All governments agree to retain a dedicated funding stream for the Reconnect program.

4. Maintain homelessness crisis measures

Once people enter homelessness, they need support to exit as quickly as possible and remain out of homelessness. Such support includes: outreach or on-site wraparound support services; transitional accommodation (shelters, refuges, etc); and transitional accommodation for First Nations people visiting other communities.

Many people who become homeless require effective responses to help them quickly exit homelessness by finding a new home. Some of those will subsequently need support to maintain housing and access ongoing assistance with health, wellbeing, education, employment and other issues. Supports will be more intensive for people experiencing chronic homelessness.

Over time, shifting the system to prevention responses will markedly reduce the investment needed in crisis responses for people already homeless. However, there will have to be a phased approach to this, as the current housing emergency means there are so many people currently in crisis situations that investment in outreach and transitional accommodation cannot yet be scaled back.

Modern, fit-for-purpose transitional accommodation

In the overwhelming number of cases, it is best for people experiencing homelessness to move quickly and directly into permanent independent housing – their own home for as long as they want to stay there - with any necessary supports provided to the individual from that base. The current housing emergency has made that impossible. Instead, individuals and families are finding themselves stuck in transitional accommodation such as refuges and shelters for lengthy periods, while they wait for a private rental property they can afford or for social housing place to become vacant.

This short-term accommodation is often in transitional accommodation facilities managed by SHS. These facilities were originally designed for short stays, but have ended up being used for long-term stays (“bed block”) as there are no exit options available. Although expected terms vary across States and Territories, generally “crisis accommodation” was designed for three month stays and “transitional accommodation” was designed for stays of 12-18 months. In Mission Australia’s recent experience, people have been staying in our crisis accommodation facilities for up to two years in some areas, due to the lack of long-term housing as the emergency worsens.

The bed block in transitional accommodation means that too many people requiring immediate accommodation are turned away. Almost two in three people who access SHS are not able to be assisted into such accommodation.⁶³

Only the provision of adequate supply of affordable private and social housing, plus adequately funded support for those who need it, can resolve this bed block situation. Until that is realised, transitional accommodation facilities will remain a necessary part of the homelessness service system. Once measures to increase supply are in place, the numbers of such facilities can and should reduce.

Despite this, there will always be a role for a relatively small number of modern fit-for-purpose transitional accommodation facilities, to cater for the small subset of people experiencing homelessness who need some short-term support before they are ready to move into their own independent housing with or without support delivered into their own home. This subset can include people:

- escaping domestic and family violence who are at immediate danger and urgently need a safe place while a permanent home is being organised;
- needing assistance to apply for private or social housing, for example to obtain identification or other documents, and have nowhere else to live in the meantime; and
- requiring support to learn to live independently, for example to learn about rental payment arrangements and property care.

Table 3: Elements that work and don't work in crisis accommodation⁶⁴

What works	What doesn't work
<ul style="list-style-type: none"> - Flexible length of stay. - Well trained and supportive staff. - Staff with lived experience and Aboriginal workers to support cultural safety. - Trauma-informed care. - Support for a broad range of needs. - A built form that is trauma-informed. - Accommodation should be self-contained with kitchen facilities and private bathrooms, and there should be options that allow people to keep pets with them. - Ongoing support should be provided to people after exiting crisis accommodation to long-term housing to ensure tenancy sustainment. 	<ul style="list-style-type: none"> - Poor quality accommodation. - Lack of respect or negative judgement from staff. - Services or environments that are unsafe. - Excessive house rules or a complete lack of rules. - Unreasonable conditions to search for housing options which are not available. - Unaffordable co-contributions to crisis accommodation. - Short stays without support (especially in purchased accommodation). - Short stays with no pathways to long-term housing or ongoing support

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 post natural disasters that involve the mass displacement of people who have no other means to remained safely housed.

However, we stress that this 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 COVID-19 pandemic and cyclical economic downturns presented 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.'

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. (We note that it can also have applications for permanent housing, including social homes 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 which were 23m squared as part of a temporary modular housing project in Vancouver, Canada.⁶⁵

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.

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 since having more than one person living in 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 housing.

ACTIONS

- 4.1. All governments commit to increase funding in the NHHA in response to the housing and homelessness emergency for current crisis homelessness measures, while noting that over time this amount should reduce as the system shifts to a prevention approach.
- 4.2. The Federal Government set up a taskforce within Housing Australia in partnership with affected communities to assess their local, place-based accommodation needs and develop strategies to deploy timely temporary solutions while the required long-term social and affordable housing stock is delivered.

5. Embed accountability, data collection and performance reporting

Adopt ambitious targets to drive change

Targets are a critical element for the National Plan, as they drive priority setting, resource allocation and determining the solutions to meet them. Targets should be ambitious and have firm and clear language so there is common understanding among accountable parties.

Mission Australia proposes the following targets as examples of what the National Plan needs to aim for:

- national targets for zero functional homelessness within the next 15 years,ⁱ including a commitment to:
 - guiding principles for a systems approach to housing and homelessness adopted by the Federal and all State and Territory governments;
 - zero street sleeping by the end of the NHHA term;
 - no exits into homelessness from institutions by the end of the NHHA term;
- a national target to reduce the number of low-income people living in rental stress;
- a net year-on-year increase in social and affordable housing in each State and Territory; and
- transfer of all public housing to the community housing sector on a per State and Territory basis by 2050.

These targets should be linked to a performance monitoring and reporting framework, as outlined below.

ACTIONS

- 5.1. All governments agree to adopt ambitious housing and homelessness targets in the National Plan to drive the change that is required and to maximise accountability among relevant parties.

ⁱ Functional zero homelessness means that the number of people experiencing homelessness at any time in a given month does not exceed the number of people that the community has, in the past, been able to house each month.

Implement a performance monitoring and evaluation framework to track progress

There should be transparent and accountable performance monitoring and reporting that measures the impact of funding across the housing and homelessness systems, aligned to the policy intent and targets of the National Plan.

Historically, the NHHA is the main mechanism for monitoring the impact of funding and activities, yet it lacks rigour and transparency. This means it is impossible to assess progress against the NHHA's outcomes due to their aspirational nature and the lack of a measurement framework. This oversight must not be repeated in the National Plan or the next NHHA.

Mission Australia called for this architecture in the new NHHA in our submission to the Productivity Commission review of the Agreement, and we note that this was recommended in its report. There was also the suggestion to develop an outcomes framework so, *“governments can better understand the impacts of different forms of housing assistance on tenants' wellbeing. The framework could cover work and education opportunities, health and wellbeing outcomes, and reducing interactions with the justice system.”*⁶⁶

We believe that, as standard good practice in accountability, an outcomes-based performance monitoring and reporting framework should be a key element of the National Plan and be linked to the next NHHA.

Development of a performance framework

The basis of a robust and effective performance monitoring and reporting framework is the development of a Theory of Change with clear short, medium and long-term outcomes.

There is an opportunity to utilise the data captured in the Specialist Homelessness Services Collection (SHSC), in other data sets held by Federal and State/Territory agencies (such as social housing data systems) and in community service providers' data holdings, to assess shorter-term outcomes and indicators assessing factors that drive homelessness (such as domestic and family violence, or poverty) as well as housing outcomes. Notably, Mission Australia has collected relevant data through the Personal Wellbeing Index for many years, and this is now also collected by other providers as required by the NSW Government's SHS program.

Further, valuable additional By-Name List data^j is being collected about people who are street sleeping through the various Advance to Zero collaborations around Australia.⁶⁷ The benefits of utilising this data include: providing more timely information on individuals' homelessness experiences so they can be assisted more seamlessly without needing to retell their stories; enabling better evaluations and

^j The By-Name List is a database that holds important information on people street sleeping, to help organisations match people with the most appropriate support.

assessments of the effectiveness of different programs, policies and interventions; and creating additional insights into experiences of homelessness and systems-level issues. The Productivity Commission encouraged governments to adopt this data collection more widely⁶⁸ and Mission Australia takes this opportunity to reiterate this call.

Data development priorities

While the SHSC includes a significant amount of detail as to clients' situations when presenting for homelessness support, its usefulness could be further improved through:

- Collecting greater detail on the reasons why the client is experiencing a housing crisis. While frontline workers are required to enter the 'Main Reason' for seeking assistance, they generally populate this with a general response such as 'housing crisis.' While it is possible to enter other, secondary reasons, a compulsory variable recording the reason for 'housing crisis' would paint a fuller picture as to the circumstances of different clients. Frontline workers would generally be aware of this information and able to include it in their SHSC responses if an appropriate variable were included. Mission Australia intends to improve this within our own Client Information System over the coming year.
- Client voice: A number of other national minimum data sets include client measures of success. All variables in the SHSC data set are based on data provided by frontline workers (from information gained from the client) but do not include information provided directly by clients about their experiences or wellbeing.

Data overload and data quality are significant issues. Streamlining the data collected in the first month of service would help with this as current requirements are much larger than necessary. For example, frontline workers must currently record, in the first month in which they work with an individual, responses for eight separate variables for three separate timeframes (that is, 24 entries). Most of these are not appropriate at that stage of the client's journey with the service, result in many "don't know" entries and can detract from the relational trust-building needed for a positive engagement.

Improvements to the way the information is presented back to services in a digestible way would also help staff understand the value of the data collection.

Non-government service providers do the bulk of collecting, reporting and analysing data, and of course have the closest connection to clients and the most in-depth understanding of their presenting needs and eventual outcomes. Accordingly, non-government SHS providers should be intimately involved in the refinement and development of the SHSC, and indeed in the creation of a broader housing and homelessness evaluation and research agenda.

Resource this work adequately

An outcomes-based performance monitoring and reporting framework should be the basis of robust evaluation and tracking progress against performance indicators. Investment in research and evaluation throughout the life of the National Plan is critical to assess the implementation and achievement of

targets and outcomes in an objective and systematic way. Evaluation is also critical to build an evidence base of what works, continuously improve strategies and programs to improve outcomes and bring effective and innovative initiatives to scale.

Access is needed to data at all levels of the system to support continuous quality improvement of strategies, levers and programs. The ability for agencies to access comparative/benchmarking data collected via the SHSC will also support quality assurance and performance improvements at a service level. Further, State and Territory governments need to agree consistent data definitions and indicators as part of the overall framework. Without this, it is very difficult to measure or report on outcomes nationally, as each jurisdiction measures a range of key indicators quite differently and this can skew the interpretation and commentary on results.

ACTIONS

- 5.2. All governments agree to establish transparent and accountable monitoring and reporting provisions that measure the impact of funding and activities across the housing and homelessness systems and interface with mainstream services in relation to established targets and outcomes. This should include:
- the regular publication of progress against targets and outcomes as soon as data are available; and
 - an outcomes-based performance monitoring and evaluation framework incorporating a theory of change and short-, medium- and long-term indicators.

Governance arrangements to support implementation and monitoring

New institutional arrangements are required to support the proper implementation and monitoring of the National Plan.

Independent Advisory Council on Homelessness

The Federal Government has established a strong advisory mechanism on housing in the form of the National Housing Supply and Affordability Council (NHSAC). However, the Council does not have homelessness within its remit, leaving open the question of how to communicate expert advice on homelessness to government.

Mission Australia concurs with a recommendation put by Homelessness Australia that the stewardship of the Housing and Homeless Ministerial Council (HHMC) should be supplemented by advice from an independent Advisory Council on Homelessness, which should include academic, sector and lived experience representatives.

This Council should mirror the research, analysis and reporting functions, performance monitoring and reporting of the NHSAC in relation to housing.

A less-preferred alternative could include broadening the remit and membership of the NHSAC, to include an explicit mandate related to homelessness, and to add members with homelessness expertise. However, as homelessness policy involves consideration of a far broader set of issues than housing supply and affordability – as illustrated by the range of prevention initiatives required to end homelessness that sit outside the housing and homelessness systems - this limited approach would inevitably miss the critical interactions across human services needed to reduce and better respond to homelessness.

National homelessness research and evaluation program

The gaps in homelessness research and evaluation studies are preventing a full, robust analysis of what works and how governments should invest to end homelessness. The Federal and State/Territory governments, including the Australian Centre for Evaluation within the Australian Treasury, should jointly establish and fund a national homelessness research and evaluation program, which adopts a systems approach to ending homelessness.

Housing and Homelessness Data and Evaluation Working Group

There are significant data, evaluation and research gaps in the evidence base that should underpin homelessness policy. The existence of these gaps has been highlighted by our work on the Homelessness Solutions Model Framework (see discussion paper attached). A coordinated approach to detailing and addressing these gaps is needed.

The Housing and Homelessness Ministerial Council (HHMC) should establish a new Housing and Homelessness Data and Evaluation Working Group, comprised of government officials alongside researchers, NGO sector representatives and people with lived experience, with a remit including advising HHMC on:

- development of the national homelessness research and evaluation program;
- general research, evaluation and data issues pertaining to housing and homelessness;
- the data sharing protocol and data quality improvements to which the HHMC committed earlier this year;⁶⁹
- recommended improvements to the SHSC (as noted above);
- the finalisation of the Homelessness Solutions Model Framework.

“What works” centre for housing and homelessness policy

At present, there is no central repository of research and evaluation material on housing and homelessness. The Federal Government should establish a “what works” centre for housing and

homelessness policy. This follows a Productivity Commission recommendation for the establishment of such a centre for housing policy but expands it to explicitly include a homelessness focus.

This centre would gather together research and evaluation on housing and homelessness policy and programs, derive insights based on this work, and make it accessible in the public domain. The “what works” centre should be a collaborative partnership with academics, NGO practitioners and evaluators, and people with lived experience including First Nations people with lived homelessness expertise. This membership reflects the significant data holdings and leading analytical capabilities of the NGO sector with regard to service delivery and outcomes, as well as the deep practical experience of practitioners and the essential insights from lived experience.

ACTIONS

5.3. The Federal Government establish an independent Advisory Council on Homelessness.

5.4. Federal and State/Territory governments establish the following governance arrangements to facilitate a coordinated approach to housing and homelessness research, evaluation and data improvement:

- a national homelessness research and evaluation program;
- a Housing and Homelessness Data and Evaluation Working Group to report to the Housing and Homelessness Ministerial Council; and
- a “what works” centre for housing and homelessness policy.

Attachments

Attachment 1. Prototype Homelessness Solutions Model Framework

Attachment 2. Flatau, P., Bennett, M., Di Nicola, K., Callis, Z. (2023). *A prototype Homelessness Solutions Model Framework: Evidence-based cost-effective solutions to ending homelessness in Australia – A Discussion Paper*.

About Mission Australia

Mission Australia is a national Christian charity that has been standing alongside Australians in need since 1859. We combat homelessness, provide housing, assist struggling families and children, address mental health issues, fight substance dependencies, support people with disability and much more. Together, we stand with Australians in need for as long as they need us.

We are both a homelessness support service provider and a Tier 1 Community Housing Provider, and have an award-winning evaluation/research centre, a well-developed policy capability and productive collaborative relationships across the housing, homelessness, broader community services, government, academic and business sectors. This positions us well for contributing to the development of the National Housing and Homelessness Plan. We are pleased to assist further with the development of this important initiative.

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