



Submission to the Department of Social Services on the National Housing and Homelessness Plan

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P 1300 663 298 | **F** 1300 663 528 | **ABN** 75 467 729 203 | GPO Box B74, Perth WA 6838 | unitingwa.org.au

Uniting WA respectfully acknowledges the Noongar people as the Traditional Custodians of the land on which we provide our services. We recognise their unique and spiritual connection to Country and waters. We value the oldest continuing culture in the world and pay our respects to Elders past and present.

About Uniting WA

Uniting WA is pleased to make the following submission in response to the Australian Government's Issues Paper on Housing and Homelessness to help guide the development of the National Housing and Homelessness Plan.

Uniting WA (Uniting) is part of the UnitingCare Australia network, the country's largest community service provider network, which employs over 50,000 staff, supported by more than 30,000 volunteers.

Uniting's programs span the areas of homelessness and crisis accommodation services, family and children's services, mental health and disability support, as well as financial wellbeing and reintegration services.

We're also a registered Tier 2 Community Housing Provider.

In WA, Uniting has extensive experience and a strong track record of persisting to create tangible positive impacts for vulnerable Western Australians. We deliver essential community services with respect and compassion, and we work with the government to build a strong foundation for positive change, supporting policy implementation that address social issues.

We deliver a range of programs and services within the housing and homelessness space, which include –

- Outreach services including Street to Home and HEART (Homelessness Engagement Assessment Response Team) delivered by a partnership consisting of Uniting WA, St Patrick's Community Support Centre, Wungening Aboriginal Corporation and Indigo Junction.
- Our crisis support centre, Tranby Engagement Hub, which provides essential food, meals, showers, laundry, internet and access to a range of medical, legal, government, counselling and advocacy services to many vulnerable Western Australians, particularly those sleeping rough.
- Low-barrier crisis accommodation service Koort Boodja
- Our Homeless Accommodation Support Service (HASS), which provides case management and transitional accommodation support.
- Specialist Re-entry Services to support men exiting prison
- The Independent Living Program (ILP), which supports people who identify as experiencing a long-term, persistent mental illness

Our Housing services team manages 350-390 tenancies across 315 properties.

We also provide a range of financial wellbeing services and facilitate the Escaping Violence Payment (EVP) funded by the Department of Social Services in conjunction with seven other UnitingCare Australia agencies.

Introduction

The National Housing and Homelessness Plan represents an enormously important opportunity to address homelessness in communities across Australia, take a strategic approach to housing across the continuum and improve collaboration and communication between all levels of government and the community services sector.

This is critically important in Western Australia, which has the highest proportion of rough sleepers of all states and territories and significant issues of bottlenecking within the housing continuum, making it difficult for service providers to transition people out of homelessness.

Western Australia also faces a significant shortage of private rentals, with a current vacancy rate of 0.7%, resulting in a fiercely competitive market. The confluence of high inflation, rising interest rates, and a lack of housing supply has made securing and maintaining a home increasingly difficult, adding new challenges along the continuum and increasing pressure on others.

With much of Uniting's work in Western Australia concentrated on helping those in crisis, we have noted a worrying flow-on affect from challenges in the private rental market into our crisis support services.

We have noted a significant shift in the demographics of people seeking support with an increased number of families with children and older women joining the ranks of people experiencing homelessness. Uniting's financial counselling data indicates that 55 families who accessed emergency relief identified as homeless in the first six months of 2023 and ABS data shows a rise of 30% in just 5 years in the number of older women experiencing or being at risk of homelessness.¹

This year, at our crisis support centre, Tranby Engagement Hub, there have been 68,894 presentations of people asking for assistance, compared to 45,480 presentations in the same period last year.² In September 2023, there were 555 presentations of new service users who had not accessed Tranby previously and in we also experienced our largest single day of presentations since the launch of the service in 2009, with 400 individual presentations on Monday 25 September 2023 between the hours of 7:30am and 12:30pm.

Currently, there are few options available to these people who are seeking support. There are very limited beds and a lack of funding for integral wrap-around support, which limits community service organisations' ability to make a real difference.

When the system works, it works well.

This is reflected in the story of Uniting WA service user – Damien.

¹ Australian Bureau of Statistics (2023) Estimating Homelessness: Census.

<https://www.abs.gov.au/statistics/people/housing/estimating-homelessness-census/latest-release>

² As of 24 October 2023, Uniting WA Tranby Engagement Hub Data

When the system works – Damien's Story

In 2021, Uniting's Homeless Accommodation Support Service (HASS) supported Damien to achieve transformative change in his life.

Damien initially sought help from Uniting's Tranby Engagement Hub and crisis accommodation services, before he was referred to our supported transitional housing program, HASS, where he spent more than 12 months.

After his time in HASS, Damien was ready to take the next step in his journey towards a long-term, secure home, which he now lives in independently. When speaking about his journey, Damien says that transitional step was key in preparing him for having his own house.

"The HASS program helped me re-civilise myself. I could shower every day, shave, keep my room clean. It also meant I could start healing in my life and from my childhood trauma," Damien said.

It is stories like Damien's that have shaped our recommendations within this submission.

Uniting WA's recommendations towards the National Housing and Homelessness Plan begin with an urgent call for adequate future funding to support those facing the most vulnerability in our community now while new housing supply comes online over the next decade.

Our submission also details several key, recurring challenges for community service organisations that should be considered in the development of the Plan. These challenges concern funding, contracting, data collection and compliance.

Summary of Recommendations

Recommendation 1: Establish an Interim Homelessness Services Funding Package to ensure the first five years of the National Housing and Homelessness Plan are adequately resourced to support those facing vulnerability while more housing supply comes online.

Recommendation 2: Improve accountability and transparency around National Housing and Homelessness Agreement (NHHA) funding.

Recommendation 3: Increase Commonwealth grant opportunities to support innovative projects that target priority cohorts and/or gaps in the housing continuum.

Recommendation 4: Embed lived experience voice in policy making and fund community service organisations (CSOs) to deliver programs or projects that increase lived experience engagement and advocacy.

Recommendation 5: Fund community service organisations to improve data collection to lead to more valuable reporting and better outcomes.

Recommendation 6: Include specific, best-practice guidelines for contracting and commissioning within the National Housing and Homelessness Plan to guide all levels of government.

Recommendation 7: Address the underutilisation of housing assets and increase flexibility within contracting to allow Community Housing Providers (CHPs) to more efficiently and strategically manage assets.

Recommendation 8: Streamline and simplify CHP registration and ongoing compliance, including harmonising regulatory frameworks nationally.

Recommendations

- 1. Establish an Interim Homelessness Services Funding Package to ensure the first five years of the National Housing and Homelessness Plan are adequately resourced.**

Uniting recognises the significant work being done by multiple levels of Government to increase housing supply nationwide, including the Social Housing Accelerator payment, the establishment of the National Housing Supply and Affordability Council, the passage of the Housing Australia Future Fund and the work towards a National Housing and Homelessness Plan.

However, for the Plan to be successful it must be adequately resourced.

As we work to build those homes and address the bottleneck in housing supply, we must ensure the adequate funding of services that assist those most in need.

The community services sector has been chronically underfunded for many years and urgent investment in the sector is required to address the compounding issues of rising operational costs, increasing service demand and the growing complexity of client needs.

Uniting welcomes the one-year extension of the National Housing and Homelessness Agreement which will provide approximately \$1.7 billion in 2023–24 to the states and territories for housing and homelessness services. We also note that this funding extension includes an additional \$67.5 million of dedicated funding to assist the sector to address homelessness.

Uniting is urging the Commonwealth Government to guarantee an annual commitment of at least \$67.5 million (plus indexation) until 2029 that is dedicated to homelessness services to ensure the National Housing and Homelessness Plan can effectively achieve its objectives.

This commitment will ensure state and territory governments can effectively plan future service delivery and make some real progress towards ensuring that every person in our community has a safe place to call home.

As things currently stand, the demand for support at the acute end of the housing continuum far exceeds the capacity of services to respond, and the growing housing crisis is increasing that demand. The consequence is that services are often unable to meet individual's need for support and access to housing and accommodation.

This is illustrated by data from the Australian Institute of Health and Welfare (AIHW) on unassisted requests by Specialist Homelessness Services.³

³ AIHW, SHS annual report, Table CLIENTS.24: Clients, by need for services and assistance and service provision status, and by state and territory, 2021–22

Service sought by the client	How many people needed the service	Service provided	Service not provided or referred
Short-term or emergency accommodation	108,822	59%	32%
Medium-term accommodation	80,406	26%	56%
Long-term housing	107,728	4%	72%

Uniting WA captures data related to unmet need at our crisis drop-in centre Tranby Engagement Hub, which serves people 18 years and over who are experiencing homelessness in and around the City of Perth. Tranby provides food, showers, access to Centrelink and legal services, as well as referral to external agencies, most of which are either crisis accommodation or transitional accommodation services.

The table below compares referral data to the unmet need for services in Q3 2023 (July-September). These unmet needs are not specific to accommodation, although a large proportion of them are.

	Referrals to Other Agencies *Tranby and Key Worker Support	Unmet Need - Services
July	863	7,472
August	818	7,525
September	609	5,338

In the Perth metro area, we enumerate there are approximately 1,229 crisis and transitional beds, with very little free capacity.⁴ By-Name List (BNL) data for the month of September 2023 indicated that there were 1,156 people experiencing homelessness in the Perth metro area, with 613 of those people sleeping rough.

This service capacity shortfall results in more people being turned away, longer wait lists, increased wait times for support workers, greater reliance on demand management strategies (such as limits on support periods or accommodation stays), and cost shifting to other service systems like health, mental health, child protection, and justice.

A dedicated homelessness services funding package with a commitment over the first five years of the National Housing and Homelessness Plan will enable state and territory

⁴ Shelter WA and Parliament of Western Australia Hansard (Legislative Assembly, 13 June 2023) data - <https://www.shelterwa.org.au/homelessness-expected-to-rise-in-western-australia>

governments to confidently invest in service delivery and increase the number of beds available to those needing rapid intervention.

2. Improve accountability and transparency around National Housing and Homelessness Agreement (NHHA) funding.

The formulation of the National Housing and Homelessness Plan is the key opportunity to improve the efficacy of the National Housing and Homelessness Agreement (NHHA).

As noted in the DSS Issues Paper, the 2022 Productivity Commission review of the National Housing and Homelessness Agreement, *In need of repair*, recommended the Australian Government use the Plan to create a blueprint for reform for homelessness and housing services. One aspect of this reform must be increasing accountability and transparency around National Housing and Homelessness Agreement (NHHA) funding.

Currently, the National Housing and Homelessness Agreement's performance framework is not sufficient to hold governments to account on their contribution to improving access to affordable, safe and sustainable housing across the housing spectrum. The performance indicators are not comprehensive, and some are ambiguous. Reporting is incomplete and data development has been slow.⁵

There is a lack of transparency about where funding is allocated within states and territories and the impact it has across the housing and homelessness systems.

The next NHHA should include clear and accountable monitoring and reporting measures that evaluate the funding's impact on housing and homelessness systems. These measures should be aligned with the policy objectives and goals of the Plan. Evaluation is vital to establishing an understanding of successful approaches, continuous improvement and upscaling innovative initiatives that have proven impact.

Indexation arrangements within the NHHA should also be more transparent. It is not clear why indexation rates are considered advice to government and not publicly released. To improve transparency and accuracy, specific indexes should be created for the community services sector by an independent body.

While the Commonwealth may include indexation in funding to the state and territory government, it is left to the discretion of state or territory governments to decide how that funding is distributed, which compounds uncertainty for service providers.

Agreements between the Commonwealth and states and territories should clearly include a requirement that states and territories should appropriately index funding provided to CSOs.

⁵ Finding 4.3, Productivity Commission (PC), [*In need of repair: The National Housing and Homelessness Agreement – Study report*](#), 2022.

3. Increase Commonwealth grant opportunities to support innovative projects that target priority cohorts and/or gaps in the housing continuum.

The DSS Issues Paper highlights several groups that are disproportionately more likely to experience homelessness. While men were more likely to experience homelessness in Australia (56% of the homeless population), women accounted for 82% of the increase of people experiencing homelessness between 2016 and 2021.⁶ Older women (55 and over) were the fastest growing homelessness cohort between 2011 and 2016 and people under the age of 12 were the fastest growing homelessness cohort in 2021.

The National Housing and Homelessness Plan should advance further funding mechanisms that specifically target these priority cohorts. There are currently limited Commonwealth funding opportunities outside the NHHA. While bonds and loans are available through National Housing Finance and Investment Corporation (NHFIC), now Housing Australia, these are often not fit-for-purpose for smaller organisations and tend to be targeted at larger developers. While this is understandable in terms of achieving the scale of development required to meet national housing targets, it overlooks that Specialist Homelessness Services (SHS) and smaller Community Housing Providers (CHPs) are often better placed to deliver and support housing and homelessness services to very targeted cohorts of people who are at risk of or experiencing homelessness. CSOs are best placed to deliver programs for targeted cohorts, as they have the knowledge, capacity and frontline workers to ensure service quality.

Targeted funding opportunities help align the objectives of government and CSOs and a greater number of opportunities ensure there is an ongoing pipeline of innovative projects coming online.

Requirement for CapX and OpX

That being noted, there is scarcity of funding opportunities that provide both capital and operational funding support. This is most pronounced between levels of government, where the overarching aim may be to boost crisis accommodation or social housing, but the composition of grant programs or funding is not currently designed with holistic program delivery in mind.

Funding for programs that address gaps in the housing continuum is also important.

People exiting homelessness and transitional supported accommodation programs have limited opportunities to secure safe, affordable and sustainable housing options that facilitate their long-term independence.

As a result, these individuals are at high risk of returning to homelessness and are more likely to become trapped in an ongoing cycle of disadvantage – at a significant cost to the individual, the Government and the broader community.

⁶ ABS, [*Census of Population and Housing: Estimating Homelessness*](#), 2023.

A gap identified by Uniting is that of medium to long-term supportive housing models. Uniting has developed the concept of Aspirations Housing to address this gap.

Case Study – Aspirations Housing

Uniting’s Aspirations Housing model is designed to support people who have demonstrated their potential to live independently but may face challenges maintaining traditional tenancies.

Aspirations Housing sits between transitional supported accommodation placements and social housing (Figure 1).

The program combines a supportive landlord approach (the landlord being Uniting WA) with light touch supports, which are flexible and tailored to the unique needs of each individual accessing the service.

Supportive housing models are important because they offer a holistic approach to addressing homelessness and housing instability. They provide stable housing, support services, and a pathway to improved physical and mental well-being, social inclusion, and economic self-sufficiency.

Supportive Housing Along the Housing Continuum

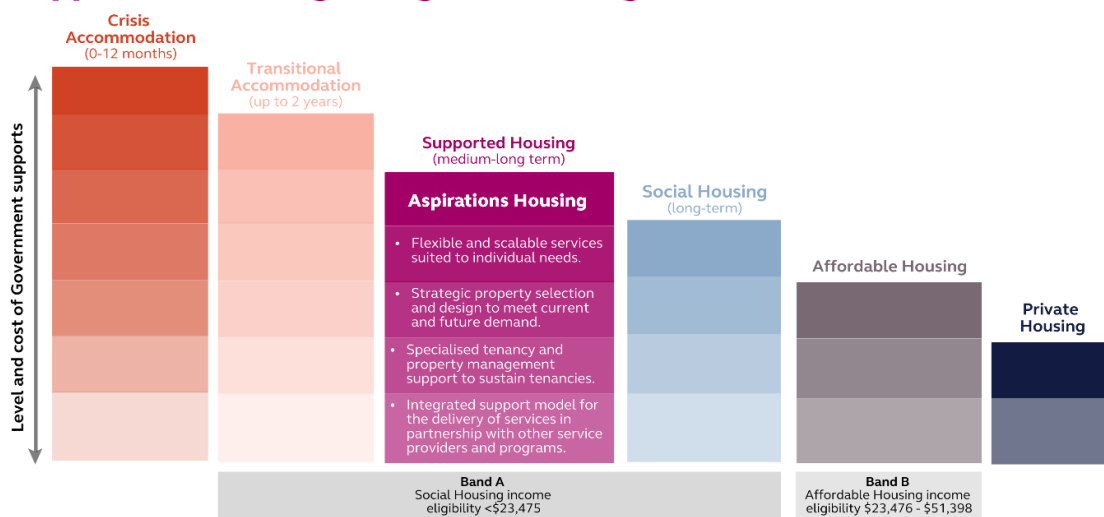


Figure 1 - Supportive housing along the housing continuum with Western Australia’s income limits

There is demonstrated success of supportive housing models to address homelessness and such programs should be identified and provided requisite investment.

4. Embed lived experience voice in policy making and fund community service organisations (CSOs) to deliver programs or projects that increase lived experience engagement and advocacy.

The inclusion of lived experience voices in policymaking ensures that policies are better informed, more responsive, and ultimately more effective in addressing the real needs of the community.

Individuals with lived experience can provide firsthand insights into the challenges and nuances of the issues being addressed. This authenticity enhances policymakers' understanding and fosters empathy, leading to more compassionate and effective policies.

While the DSS Issues Paper states that the Plan will draw on insights from those with lived experience of housing stress or homelessness, this voice needs to be significantly embedded in the Plan going further than ad-hoc consultation.

Individuals with lived experience should collaborate on the Plan's formulation and be empowered to provide ongoing feedback as the Plan is implemented through formal mechanisms such as a Lived Experience Advisory Committee.

Capacity building of CSOs to foster lived experience voice and assist individuals to engage and advocate should also be a focus within the National Housing and Homelessness Plan.

DSS could consider similar grant programs like the Information Linkages and Capacity Building (ILC) program in the disability services space for the housing and homelessness sector.

5. Include specific, best-practice guidelines for contracts and grant agreements within the National Housing and Homelessness Plan to guide all levels of government.

The National Housing and Homelessness Plan should provide leadership around contracts and grant agreements.

The challenges faced by the community services sector when it comes to contracting are well known. Contracts and grant agreements are generally too short, inflexible, out-of-step with cost realities and rarely fund data collection or program evaluation.

Longer grant agreements are fundamental for the sector, as CSOs regularly lose valued staff when there is continued uncertainty and it is difficult for organisations to plan for the future. Current grant agreements are often prescriptive and do not allow CSOs enough flexibility to change service delivery to meet the changing needs of communities.

There is often a strong message from Government and the Department that funding allocated to administration needs to reduce and be redirected to funding the frontline delivery of services. However, Government is consistently increasing the administrative burden for CSOs through requirements for data collection, acquittals and frequent meetings. Discrete funding packages or grant programs focused on capacity building specifically related to data could assist in addressing these challenges. Working with

better data allows both government and organisations to gain new insights into how to meet the needs of vulnerable people in our communities.

By the National Housing and Homelessness Plan including specific, best-practice guidelines around data collection, contracting and grant agreements, all levels of government can then be tasked with aligning their current practices to those guidelines.

6. Address the underutilisation of housing assets and increase flexibility within contracting to allow Community Housing Providers (CHPs) to more efficiently and strategically manage assets.

While new social housing eases pressure on demand, many existing social dwellings are underutilised. As captured in the Issues Paper, Australia uses the Canadian National Occupancy Standard (CNOS) to determine the suitability of dwelling size. Based on the CNOS standard, housing utilisation is described as underutilised when it has 2 or more bedrooms surplus to the CNOS bedroom requirement for the household.

Between 2017 and 2021, the proportion of underutilised dwellings was 17% for public housing, 11% for community housing and 26–27% for state owned and managed Indigenous housing (SOMIH).

The CNOS is helpful as a nationally agreed tool to evaluate best housing fit.

The National Housing and Homelessness Plan should approach the suitability of dwellings in a holistic manner, concentrating on both underutilisation and overcrowding. The Plan should identify ways for governments and their partners to improve suitability of dwelling size.

One way to address underutilisation is through contract reform. Underutilisation is exacerbated when governments mandate that properties are permanently tied to specialised programs or contracts limit flexibility to swap properties between programs. Contracts need to be more contemporary, fit for purpose, agile and commercially sound. Embedding more flexibility into housing contracts will enable the community housing sector to more efficiently and strategically manage their assets.

7. Streamline and simplify CHP registration and ongoing compliance, including harmonising regulatory frameworks nationally.

The National Regulatory System for Community Housing (NRSCH) regulates community housing providers across all states, except Victoria and Western Australia. As a result, there are challenges faced by community housing providers in Western Australia that are unique to the state.

Under the current regulatory regime in Western Australia, CHPs often must provide the same information twice in different formats to two teams within the same Department – contracting teams and the Community Housing Registration Office (CHRO).

This places a regulatory burden onto CHPs that proves difficult to deal with even for larger organisations, taking away time and resources from core business functions and

effective service delivery. This burden is then amplified for smaller organisations and Aboriginal Community Controlled Organisations (ACCOs). A solution to this issue is to encourage Departments to consolidate regulatory processes and have teams communicate internally to ensure necessary compliance.

Another challenge is that Western Australia's exclusion from the NRSCH data collection process means that community housing providers in WA lack national and interstate comparability. This can lead to inconsistent practices across the state and the country, potentially hindering capacity building and quality improvements for better tenant outcomes.

Finally, in the Western Australian context, there is a need for better recognition of the distinct types of tenancies that some CHPs manage and an understanding that certain contracting requirements (for specific programs or service delivery) may not align with CHRO requirements.

This is illustrated by the case study below regarding Uniting WA's Independent Living Program (ILP).

Case Study – National Standards for Mental Health and Uniting's Independent Living Program

Uniting WA supports up to 221 people who identify as experiencing long-term, persistent mental illness to live independently in their own home, in the community. It's designed specifically for people whose mental health compromises the stability of their housing. ILP uses a supported housing model – which means that we support people to maintain their tenancy, work towards their recovery, engage with their community and remain in safe, secure housing.

Uniting runs this program with funding support from the Western Australian Mental Health Commission and is obliged through that contract to operate our services guided by the National Standards for Mental Health.

These standards require person centred services that are flexible to meet the needs of our tenants. However, community registration requirements mandate multiple yearly inspections (to a degree that would be considered unreasonable to a tenant in a private rental), and these inspections impact the relationship with ILP residents, undermining the objectives of the program.

The National Housing and Homelessness Plan has an opportunity to shine a spotlight on key pain points for CHPs and place some urgency around addressing such challenges.

Conclusion

The National Housing and Homelessness Plan is a significant step forward in the collective effort to ensure that every Australian has a safe and stable place to call home.

While we wait for policy efforts to increase housing supply to make their impact, we must not forget the most vulnerable in our community, those that need support now.

The insights shared with DSS within this submission and by other sector stakeholders will help provide the foundation of a strong, fair housing system. Adequate resourcing and bold thought leadership will see the National Housing and Homelessness Plan be a central guiding document for all those working to address our current challenge over the next 10 years.

Contact information

Name	Position
Michael Chester	Co-Chief Executive Officer
Jen Park	Co-Chief Executive Officer
Alisha Aitken-Radburn	Senior Manager, Advocacy