



**EQUALITY
RIGHTS
ALLIANCE**

**Submission by the Equality Rights Alliance to the Department
of Social Services in response to the *National Housing and
Homelessness Plan Issues Paper, 2023***

20 October 2023

ERA Secretariat contact:

Toni Hassan

era.projects@ywca.org.au

CONTENTS

Introduction, p2

Principles for a successful NHHP, p5

The NHHP from a gender perspective, p13

- **Gender and housing: a summary**
- **Women missing out**
- **The most vulnerable cohorts of women: problems and solutions**
 - **Older women**
 - **Young women**
 - **Single mothers**

INTRODUCTION

The Equality Rights Alliance (ERA) is one of the six National Women’s Alliances funded to advise the Office for Women on gender policy in Australia. ERA is Australia’s largest network of organisations advocating for gender equality, women’s economic security, women’s leadership and recognition of women’s diversity. We are advised by 67 national-level or expert NGOs with a focus on the impact of policy or service delivery on women.

ERA welcomes this opportunity to respond to the [National Housing and Homelessness Plan 2023 Issues Paper](#) produced by the Federal Department of Social Services (DSS) which is tasked with developing the NHHP.

The National Housing and Homelessness Plan (NHHP) should provide an opportunity to set a clear and long-term vision to benefit all Australians, but especially women who are often forgotten in housing policy.¹ The housing crisis has been hitting women particularly hard for a decade. The 2016 census found that older women were the fastest growing group of people facing homelessness.² In the 2021 census, the rate of homelessness for women increased by 10.1%, compared with a much slower increase of 1.6% for men.³ If this trend continues to the 2026 census, women and girls will become the majority of homeless people in Australia for the first time.

Women are particularly vulnerable to housing stress and homelessness because they face a range of economic and social structural inequities, which accumulate over the life course including the gendered wage gap, uneven distribution of unpaid care work between the genders and gendered violence. These structural gender disadvantages accumulating over a lifetime amounts to a feminisation of poverty,⁴ which in turn disadvantages women in an unaffordable housing market. Systemic and structural inequities require a concerted and deliberate response, especially where those inequities are driving the largest increases in homelessness across Australia. That's why it is essential that the development of the NHHP incorporates a Gender Impact Analysis (GIA) as a core principle.

In relation to women, the Issues Paper acknowledges that women's homelessness is often hidden⁵. The reasons or problems are two-fold: the concealed nature of women's homelessness and how the Department of Social Services reads data that is currently captured. In the absence of a gender impact analysis, the data is not read well. development of a NHHP is an important milestone in housing policy, the culmination of years of advocacy based on the evidence about the levels of need among Australians across the housing spectrum, from home-ownership to social housing and private rental.

The Plan should use real-time data and be integrated with a new National Housing and Homelessness Agreement (NHHA) that acts as an intergovernmental blueprint for reform to

¹ Australian Human Rights Commission, [Face the facts: Gender Equality 2018](#) and HREOC (2008), Gender Equality: What matters to Australian women and men: [Listening Tour Community Report.pdf \(humanrights.gov.au\)](#)

² According to the last Census, the total number of people experiencing homelessness in Australia grew by 14% to 116, 427. <http://www.abs.gov.au/ausstats/abs@.nsf/PrimaryMainFeatures/2049.0?OpenDocument>

³ AHURI Brief: *What the 2021 Census data told us about Homelessness*, 5 April 2023

<https://www.ahuri.edu.au/analysis/brief/what-2021-census-data-told-us-about-homelessness#:~:text=Whereas%20the%202016%20census%20saw,of%20every%2010%2C000%20in%202021>

⁴ AHRC, 2019. And, Méabh Savage, Gendering Women's Homelessness, *Irish Journal of Applied Social Studies*, 1393-7022 Vol. 16(2), 2016, 43-64.

⁵ Page 24, [National Housing and Homelessness Plan Issues Paper \(dss.gov.au\)](#)

improve access to affordable, safe and sustainable housing.⁶ There should be clear definitions, consistent with those used by the Australian Bureau of Statistics, of the terms ‘affordable’, ‘safe’ and ‘sustainable’ as well as what is meant by various terms to express different forms of homelessness: transitionally homeless, episodically homeless and chronically homeless. Research shows how current representations of chronic homelessness obscure rather than reflect women’s experiences of long-term homelessness, marginalising their claims to housing and other assistance.⁷

ERA would also stress the value of a new NHHP starting a process of rolling ten-year plans, plural, so governments, regardless of their political stripe, remain future focussed with housing as a cross-party/bi-partisan priority, and with cycles for adjustment to make long term impacts.

The vantage point of ERA’s response is larger than the Issues Paper questions

Rather than respond to the 51 questions posed in the Issues Paper, ERA takes this opportunity to stress the principles that should underpin a Homelessness and Housing Plan to ensure the needs of women and children are met.

⁶ [The Productivity Commission’s 2022 review into the NHHA](#), which ERA contributed to, is highly critical of the last Agreement, calling it a mere funding contract rather than a reform document, “ineffective”, unable to foster collaboration between governments “or hold governments to account.”

⁷ Jane Bullen, [“Chronic Homelessness - What women’s experiences can tell us”](#), *Housing Studies*, June 2021. The article makes the point that Australian policy documents use terms that describe different forms of homelessness interchangeably. Bullen shows how women’s experiences of chronic and long-term homelessness can and should inform an expanded understanding of chronic homelessness and increase access by women to the benefits of permanent housing.

Principles that the NHHP should articulate to drive actions and processes:

1. Housing should be approached as a human right.
2. Intersectionality: A NHHP developed and analysed with an intersectional gender impact assessment.
3. Social justice: A NHHP that ambitiously connects to all policy across government that aims to reduce poverty, inequality and social isolation. That must include tax reform.
4. Cooperation: Housing as a responsibility of every jurisdiction and cross-sector players.
5. Evidence-based: Housing policy with clear definitions, based on robust data, and evidence of what works.
6. Accountability: A plan with clear and transparent goals and targets and regular reporting.
7. Innovation: A NHHP that anticipates and creatively adapts to climate change.
8. Care: Homelessness services and housing that sees housing, shelter and services related to it as part of an 'infrastructure of care' that aims to empower people

1. The principle of housing as a human right

Housing is enshrined as a universal human right in article 11 of the [International Covenant on Economic, Social and Cultural Rights \(ICESCR\)](#). While Australia has ratified the ICESCR, we have not formally recognised the right to housing in federal law and housing policy does not generally take a rights-based approach.

The NHHP should be predicated on the concept that housing is a human right. In doing so, it would support efforts to elevate that right in domestic law and recast housing primarily as a social determinant of health and economic wellbeing. The document should support all players under the NHHP to frame language and actions around housing as a fundamental right and help establish a public discourse around housing as a human right rather than housing as an asset for personal and private wealth creation.⁸

The NHHP should embed the structural role of the states and territories to affirm the rights of residential tenants so tenancy rights are consistent across Australia. ERA notes that in the recent release of the Employment White Paper ([Working Future](#)) the Commonwealth reiterates

⁸ Boosting public and social housing should also bring an implicit goal to shift perceptions of public housing.

its commitment to harmonise and strengthen renters' rights.⁹ ERA supports this commitments and notes that the Commonwealth can and should play a federal leadership role to provide for consistent protection for renters.

Renters should have at least four protections:

1. Protection against no-cause evictions;
2. A right to have pets;
3. Climate-responsive energy and construction standards;
4. Protection from unreasonable rent hikes;¹⁰ and
5. Adherence to the Livable Housing Design Guidelines.¹¹

Consistent with a NHHP that embeds human rights, ERA urges the Commonwealth to investigate the value of appointing an independent Federal Housing Advocate (such as that appointed in Canada, housed in and supported by the Canadian Human Rights Commission)¹² who reports to the federal parliament on housing strategy in the context of human rights. The Canadian Federal Housing Advocate is responsible for making recommendations to improve Canada's housing laws, policies and programs to drive change on key systemic housing issues and advance the right to housing for all in Canada. A Housing Advocate in Australia *could* play a critical role in the monitoring and evaluation of the NHHP as well as providing ongoing advisory support to both the Commonwealth and state and territory governments during the implementation of the NHHP.

2. The principle of intersectionality: The NHHP must be developed, monitored and assessed using an intersectional gender impact analysis (GIA)

Intersectionality recognises that the causes of disadvantage or discrimination do not exist independently, but intersect and overlap with gender inequality, magnifying the severity and frequency of the impacts while also raising barriers to support.¹³ The federal government's new national strategy on housing and homelessness should incorporate a gender perspective and

⁹ The Australian Government, Treasury (September 2023), *Working Future: The Australian Government's White Paper on Jobs and Opportunities*. Page 226.

¹⁰ In the ACT, the government has legislated that rental price rises cannot exceed increases in Canberra's consumer price increase with no obvious adverse impacts. In an effort to address structural inequality in the housing market and to provide greater security for tenants, rental increases should be restricted to CPI increases, rather than income lagging behind rental increases.

¹¹ See <https://livablehousingaustralia.org.au/design-guidelines/>

¹² Canadian Human Rights Commission: [About the National Housing Strategy Act \(housingchrc.ca\)](https://www.chrc.ca/en/about-the-national-housing-strategy-act)

¹³ Commission for Gender Equality in the Public Sector, Victorian Government. <https://www.genderequalitycommission.vic.gov.au/applying-intersectionality>

specific targets for a diverse range of women. GIA with an intersectional lens is important because different women experience housing stress and homelessness differently.

The approach becomes cost effective and impactful because government initiatives that bring an intersectional lens – seeing biases, dominant identities and power dynamics – work to prevent homelessness and housing stress in the first place by identifying discriminatory norms, practices, systems and structures that cause housing stress and homelessness in the first place.

We recommend a holistic strategy that aims to solve structural problems with an injection of funds and an approach to housing policy which ensures that federal decisions in related areas are not actively working against preferred housing outcomes.

An intersectional gender lens would ensure the NHP accounts for gendered poverty and the underlying causes of gender inequality. It would incorporate specific analysis of the different housing needs of women and include gendered targets, reflecting the different experiences and causes of homelessness among women and gender diverse people in order to be genuinely preventative and effective.

This approach would help generate specific strategies and services to address gaps in housing services for women experiencing domestic and family violence and increase both crisis accommodation and pathways out of it with wrap-around services for women with complex needs. An intersectional and gender responsive needs analysis involves incorporating the experiences of women across the lifespan and including them in program and building co-design processes. Without a gender lens the NHP and any future National Housing and Homelessness Agreement (NHAA) will produce outcomes that are ineffective for women.

3. The principle of social justice: Housing policy must be connected across government to policy aimed at reducing poverty, inequality and social isolation. That must include tax reform.

The current Government's reforms have utilised elements of the tax system (such as accelerating tax deductions for build-to-rent developments and reducing the rate for foreign investors investing in build-to-rent) but have not considered deeper reform for better housing outcomes. It is time for the Commonwealth government to address the impacts of negative gearing and capital gains tax concessions on the property market as concessions that contribute to Australians investing in real estate for capital gain (fuelling speculative investment) rather than for income. Negative gearing and capital gains tax concessions also reinforce a policy

environment which emphasises on housing as an investment vehicle, rather than housing as a human right.

The proportion of households that are renting has increased (in a very tight rental market), while incomes have not kept pace with rental prices.¹⁴ In June 2022, about 63% of Commonwealth Rent Assistance recipients were still in rental stress despite the income supplement. The payment (75 cents for every dollar of rent above a threshold until a maximum, about \$73 a week for a single and \$69 for each member of a couple) has not kept up with rising private rents, while the number of people in social housing has fallen because of decades of underinvestment in public housing infrastructure.

This Government's new approach to housing policy is occurring in the context of a broader agenda of reform relating to economic inequality and Australia's immediate and future workforce needs, including the Jobs and Skills Summit in 2022 and the recent Employment White Paper. The Issues Paper correctly identifies the crossover between the proposed NHHP and other work across government:

[S]pecific housing needs of some of these groups have been the focus of national strategies such as Australia's Disability Strategy 2021–2031, the National Plan to End Violence against Women and Children 2022–2032 and Safe and Supported: the National Framework for Protecting Australia's Children 2021–31. In addition, the National Agreement on Closing the Gap and the recently endorsed Closing the Gap Housing Sector Strengthening Plan identify housing-specific actions for attention. The development of the Plan will consider the housing priorities highlighted in these existing strategies and will also be informed by the development of new national strategies, including the National Strategy to achieve Gender Equality and National Energy Performance Strategy. The Plan will also consider the needs of groups who have not been addressed in other strategies.

There has historically been a weak link between outcomes sought by National Housing and Homeless Agreements and Commonwealth policy and the systems that create homelessness in the first place, including welfare and taxation policy. There has also been only limited focus on ensuring that housing policy supports other social and economic policy across portfolios.

The NHHP should be focused on prevention with an objective to reduce Australia's health and wealth divide, and therefore:

¹⁴ Australian Institute of Health and Welfare (2021), Housing affordability SGS Economics and Planning (2022), Rental-Affordability-Index (sgsep.com.au)

- reflect and incorporate the linkages between the NHP and the second National Plan to End Violence Against Women and Children and the two Actions Plans under that strategy¹⁵ reflect and incorporate the linkages between the strategy and Australia’s Disability Strategy 2021-2031 and the Livable Housing Design Guidelines, recognising the need to promote universal design in new builds and to modify ensure existing housing stock for people with disability and people aging in their homes;
- cater for the needs of other specific and marginalised groups of concern including young people leaving out-of-home care, Aboriginal and Torres Strait Islander people, people with disabilities and culturally and linguistically diverse communities, including migrants and asylum seekers;
- be informed by and aligned to national strategies, including the National Strategy to achieve Gender Equality and National Energy Performance Strategy, and the new National Housing and Homelessness Agreement;
- reflect research that shows social connections lower levels of anxiety and depression, drive wellbeing and longevity,¹⁶ and play a role in the protection and promotion of Aboriginal and Torres Strait Islander culture and language as per the *Wiyi Yani U Thangani Report*;¹⁷
- engage diverse policies including tax and women’s economic security to address the drivers of homelessness and housing precarity. A broader strategy would look at the adequacy and function of social security payments (including boosting and better targeting Commonwealth Rent Assistance), retirement incomes (including superannuation), how the housing market operates and the tax treatment of housing, and consider their interaction with and impact on the funding of and approaches to affordable and social housing and housing affordability in Australia;
- Address the role housing plays in the broader context of aged care, particularly the need to promote aging in place through the provision of appropriate housing stock and the

¹⁵ The 10-year National Plan to End Violence against Women and Children 2022–2032 explicitly aims to increase the proportion of victim-survivors receiving suitable housing. Unaffordable or insecure housing is a major barrier for victim-survivors to re-establish their lives after leaving a violent situation and a key consideration in their decision to leave.

¹⁶ Wickramaratne PJ, Yangchen T, Lepow L, Patra BG, Glicksburg B, Talati A, et al. (2022) Social connectedness as a determinant of mental health: A scoping review. PLoS ONE 17(10): e0275004. <https://doi.org/10.1371/journal.pone.0275004>

¹⁷ AHRC *Wiyi Yani U Thangani (Women’s Voices): Securing Our Rights, Securing Our Future Report 2020* <https://humanrights.gov.au/our-work/aboriginal-and-torres-strait-islander-social-justice/publications/wiyi-yani-u-thangani>

detrimental effects of housing stress and homelessness on health outcomes for older people.

4. The principle of cooperation: Housing as a responsibility of every jurisdiction

The NHHP should recognise and name the roles of all governments to address housing affordability and homelessness, including a reference to the Commonwealth having responsibilities for macro-policy settings which drive housing demand such as taxation and population, and to the responsibilities of state and territory governments for land use, land supply and urban planning and development policy, infrastructure policy and tenancy legislation that supports the consistent rights of tenants and the sustainability of tenancies.

Local governments already regulate residential planning and construction with the States and Territories and are at the frontline in the experience of homelessness and should play a greater role (with resources and accountability mechanisms at state level) not just in supporting the delivery of local services but approving local development that enhances housing affordability.

18

5. The principle of being evidence-based: Housing policy with clear definitions, based on robust data and evidence of what works.

ERA expects the Plan to articulate national definitions of key words in housing and homelessness sector policy, consistent with the ABS. It should make clear what we mean by, as examples, 'affordable housing', 'social housing', 'crisis accommodation' and 'transitional housing.'

Unless the Plan defines the challenges, it will have trouble meeting the challenges.

The NHHP must consider, in the context of recent funding announcements, what the most current data reveals is the most accurate social and affordable shortfall (prior to the last federal election, approximately 640,000 new dwellings).¹⁹

¹⁸ Alan Morris et al. "Australian Local Governments and Affordable Housing: Challenges and Possibilities." *The Economic and Labour Relations Review*, vol. 31, no. 1, Mar. 2020, pp. 14–33.

¹⁹ [The perfect versus the good, Inside Story](#), drawing on work by the UNSW City Futures Research Centre, Community Housing Industry Association, Australian Housing and Urban Research Institute and National Housing Finance and Investment Corporation. Also worth noting is the changing nature of Australian households (increasing one and two-person households, and fewer big families needing large homes).

For anyone but especially women in Australia, precarious housing and homelessness, is about much more than shelter. Their homelessness is rarely the result of poor choices but poor political choices; systems that combine to make their needs less visible and their income less secure.

For too many women, especially single women, single mothers with dependent children and older women, not much has to go wrong before secure housing becomes a challenge.

6. The principle of accountability: A plan with clear and transparent goals and targets and regular reporting to federal parliament.

The NHHP's design and implementation should support accountability at every level with a new performance monitoring framework and annual reporting on housing and homelessness outcomes with gendered performance indicators. There should be a structure for effective governance, including oversight by a ministerial council and channels for key stakeholders to be involved in the design and delivery of major programs under the NHHP and NHHAs.

The NHHP should help scaffold robust monitoring and evaluation of future NHHAs. In the past, action plans attached to funding levels for states and territories have been too general in nature, insufficiently gendered in focus and with no useful assessment tools to measure delivery and impact.²⁰

ERA supports the Government's inclusion of a Housing Ministry in the inner Ministry across the timeline of a strategy and to support its delivery, public mechanisms to monitor the plan in real time.

The NHHP is an opportunity to create a governance structure which makes all levels of government more accountable. How Federal Departments (Treasury, Housing and DSS which has a Housing and Homelessness Branch, for example) interact with each other and their state counterparts, and how each is responsible for housing, is not currently clear.

²⁰ A view shared by the [Productivity Commission's 2022 review into the NHHAs](#), which stated the last Agreement was "ineffective" and unable to hold governments to account.

7. The principle of innovation: A NHHP that anticipates and creatively adapts to climate change

Australians are five times more likely to be displaced by a natural disaster than people living in Europe.²¹ The continent's variable climate, geography and environment place Australian communities, infrastructure, ecosystems and cultural and heritage values in the path of frequent and high-energy natural hazard events.²²

The NHHP should ensure that all new builds under the Plan are designed to anticipate and address the effects of climate change, including design for extreme heat and cold and bushfire and flood ready design.

In a changing climate, some currently inhabited areas will eventually become uninhabitable. There will be pressure on remaining communities to house people leaving affected areas and to fund large public works to manage flood waters or storm surge or manage fire risk. The resourcing required for these projects will affect the total funding available for day-to-day community and housing support in low socio-economic areas.

Local councils around the country have developed flood and fire maps, identifying areas that will be regularly affected by climate weather events; areas from which people should be assisted to move. Ensuring that the NHHP covers all levels of government will help to integrate this work into the broader housing context.

8. The principle of care: Homelessness services and housing developed as part of an 'infrastructure of care' that aims to empower people

While the NHHP should cover all forms of housing stress, it needs to respond effectively to the needs of those most at risk of homelessness, including those who have experienced gendered and family violence, young people, children on care and protection orders, First Nations people, people leaving health or social care arrangements, and older Australians.²³ People accessing homelessness services under the NHHP must receive continuity of care and be able to progress in trauma recovery or access ongoing support for addiction or mental health issues. There NHHP should represent a shift away from clients simply receiving care (being cared for) towards people empowered to live safely and sustain their housing.

²¹ Insurance Catastrophe Resilience Report (Australia), 2020-21, p5.

²² Royal Commission into National Disaster Arrangements, Chapter 2.
<https://naturaldisaster.royalcommission.gov.au/publications/html-report/chapter-02>

²³ Australian Institute of Health and Welfare *Homelessness and homelessness services* Web article, 07 Sep 2023
<https://www.aihw.gov.au/reports/australias-welfare/homelessness-and-homelessness-services>

ERA member organisation, Project Respect works with women in the sex industry. Executive Director, Carolyn Gowers points to the problem of limited social and public housing options that offer residents shelter and peace of mind:

We are working with a lot of women at the moment (including some with children) who are now stuck in social housing that is not safe for them. It is perpetuating trauma and triggering hypervigilance. They aren't able to progress to other goals because they don't have opportunities to move to a safer home (applications are in, the wait list is long and not prioritised when the housing is already 'provided'). This includes women who have extensive histories of experiencing violence who are housed in social housing with men recently released from prison for violence. - Carolyn Gowers, Project Respect (email correspondence, October 2023)

Preventing homelessness must involve wrap-around services. Without it, the housing and homelessness policy becomes intentionally careless, not full of care. ERA's partners and member organisations are clear that too many clients fall between the cracks because of a lack of continuous care and wrap-around services; people who fall in and out of homelessness when prevention was possible. Re-entering homelessness is more expensive to governments (and taxpayers) than delivering wrap-around services. That's the evidence shown by Brisbane Common Ground: governments saved at least \$13,000 per person each year by providing the chronically homeless with access to secure, long-term housing and relevant support services.²⁴

The NHHP from a gender perspective

Gender and housing insecurity: Women are especially vulnerable

We welcome the fact that the Issues Paper for a ten-year National Housing and Homelessness Plan identifies and names multiple and intersecting structural and systemic factors, including gender, sexuality and age, that influence why people become homeless and certain 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.

²⁴ University of Queensland - Institute for Social Science Research (2015), Brisbane Common Ground: [Evaluation Final Report](#).

*Women's homelessness is often described as 'hidden' or 'invisible' because women are more likely to stay with family or friends on a couch, in a garage, or in their car. A lack of housing options could prevent women from leaving violent situations or lead to them returning to living with perpetrators.*²⁵

The Issues Paper mentions the challenges for women multiple times but fails to see women as central, rather than a narrow subset. This was a key failing of the previous NHHA – the housing needs of women were treated as a special category, siloed from the main question of housing for 'people'. Any attempt to provide a gender-neutral approach to housing in Australia is doomed to incorporate unconscious bias towards the male experience. The housing needs and experiences of women need to be central to the design and content of the NHHP.

We know that for everyone (but especially women) in Australia, precarious housing and homelessness, is about much more than shelter. Their homelessness is rarely the result of poor choices but poor system design choices; systems that combine to make their needs less visible and their income less secure.

In an economy which entrenches feminised poverty, not much has to go wrong before women, especially single women, women facing gendered violence, Indigenous women, single mothers with dependent children and older women, find that secure housing becomes a challenge.

Women experience homelessness differently to and are less visible than men. Older women who are homeless are often invisible to the public. Many live with physical or psychosocial disabilities, with homelessness exacerbating disability and chronic health conditions. They may not recognise their experiences as homelessness and are unlikely to have their needs met by existing homelessness services.²⁶

Women typically move between temporary arrangements, staying with children, relatives or friends to keep a roof over their head. Some are adept at house-sitting whilst others sleep in their car when there is nowhere else to go. They are often unable to receive home care services available to other older people who are housed. Most concerning, many women do not report violence to police and remain in relationships to avoid homelessness.

²⁵ NHHP [Issues Paper](#), page 24.

²⁶ Research based on testimonials from Home at Last clients, Housing for the Aged Action Group (HAAG).

Woeful housing stock and women missing out

The most fundamental problem is there are not enough houses and too few suitable houses for different stages of women's lives. In ERA's March 2022 [submission on housing](#) to the Productivity Commission we argued for more stock to meet the needs of diverse women and for the Commonwealth to play more of a leadership role in driving strategic thinking. The current process to develop the NHHP is therefore welcomed.

In the context of women's lived experiences, the scale of problem looks like this:

- Australia's stock of social housing, currently about 430,000 dwellings, has barely grown in 20 years, despite the population growing 33%. As of 2021, social housing was now only approximately 4 per cent of total dwellings due to the decline in funding levels for social housing since the 1990s.²⁷ The Housing Australia Future Fund (HAFF) and the recent Federal Government \$2 billion national Social Housing Fund Accelerator program where states are required to match expenditure are a good start, but experts warn don't go far enough²⁸ (Analysis for the Australian Housing and Urban Research Institute concluded that "no amount of 'innovative' procurement or financing will yield a government 'free lunch.'" Researchers say that the cheapest and most efficient way to fund new social housing is direct public investment).²⁹
- In its latest [State of the Nation's Housing Report](#), the National Housing Finance and Investment Corporation estimates that 331,000 low-income households are in rental stress, spending more than 30 per cent of their income in rent and unable to afford other essentials such as food, heating and transport.³⁰ More than 163,000 households (or over 300,000 people) are waiting for social housing. Women make up the majority of all occupants, and older occupants, in public and community housing.³¹ Women of all ages face barriers securing and keeping a home.

²⁷ AHURI, 2022, What is the right level of social housing for Australia?

²⁸ Brendan Coates (Grattan Institute), 2023, The Conversation. <https://theconversation.com/the-greens-were-right-to-pass-australias-housing-future-fund-bill-the-case-for-further-delay-was-weak-213255>

Peter Mares, 2023, Inside Story, "The Perfect Versus the Good": <https://insidestory.org.au/the-perfect-versus-the-good/>

²⁹ AHURI, 2022. <https://www.ahuri.edu.au/research/resources/submissions/inquiry-housing-australia-future-fund-2023-package-bills>

³⁰ Housing Australia, 2022. <https://www.housingaustralia.gov.au/research-data-analytics/state-nations-housing-report-2022-23>

³¹ *Older Australians: Housing and living arrangements*, Australian Institute of Health and Welfare, updated 2023.

- The national average wait time for social housing is 6 months.³² In Victoria that wait time was 17 months for 50% of the greatest need households in that state, including single mothers trying to escape family and gender-based violence.³³
- Anglicare’s 2023 Rental Affordability Snapshot shows that for a single person on the JobSeeker payment and Disability Support Pension, none of the available rentals were affordable. For a single parent working full time on the minimum wage, 0.7% of rentals were affordable. Rent is considered affordable if it is no more than 30% of a household budget.³⁴
- Single women who do not own their own home are at greatest risk of poverty in retirement.³⁵
- In cases of family and gender-based violence, women can find themselves blacklisted from rentals and have negative rental histories as a result of violence and abuse, creating additional barriers in an already competitive market. In this case, temporary visa status creates another barrier to accessing private rentals.³⁶

The most vulnerable cohorts of women

ERA seeks to take up what the Issues Paper touches on -- the problems facing certain cohorts of women (namely the top three here):

- Older women
- Young women
- Single women with dependent children
- Women escaping domestic violence (raised by ERA’s sister alliance, [The National Women’s Safety Alliance](#))

³² Productivity Commission, 2022. <https://www.pc.gov.au/ongoing/report-on-government-services/2022/housing-and-homelessness/housing>

³³ According to the Victorian Department of Families, Fairness and Housing’s [2021-22 annual report](#).

³⁴ Anglicare Australia, 2023. <https://www.anglicare.asn.au/wp-content/uploads/2023/04/Rental-Affordability-Snapshot-National-Report.pdf>

³⁵ Australian Human Rights Commission, 2019, Older Women’s Risk of Homelessness: Background Paper - Retiring into Poverty.

³⁶ AHURI, 2021 <https://www.ahuri.edu.au/sites/default/files/documents/2021-09/AHURI-Final-Report-363-Understanding-discrimination-effects-in-private-rental-housing.pdf>

- Women with a disability (supported by the advocacy of ERA’s sister alliance, [Women with Disabilities Australia](#))
- Aboriginal and Torres Strait Islander women (see the work of ERA sister alliance, [NATSIWA](#))

The NHHP should explicitly identify these cohorts and provide targets for them.

1. Older women: Problems and solutions

“I felt like Humpty Dumpty who would never be put together again. Homelessness is a form of trauma that is too often not recognised.” - Linda Hann (speaking at the launch of Ageing in a Housing Crisis, HAAG, Canberra 2023)

We know that Australia’s population is ageing and yet there are fewer older people living in homes they own outright. More older people are living in private rental, Australia’s least secure housing tenure. Older women paying off a mortgage experience higher levels of stress than their male peers, which impacts their health and wellbeing, and places further demands on our health systems. Older women are the fastest growing group of homeless people.

In addition to new public and community housing older women the NHHP needs to recognise the need for

- Funding of a range of housing options appropriate for older people, including affordable housing, low-cost retirement housing, or co-operative housing and housing build to Universal Design principles.
- Additional tailored specialist services for older people who may struggle to access help otherwise (as recommended by colleagues in the sector with [research commissioned by Housing for the Aged Action Group](#)).

2. Younger women: Problems and identifying solutions

“I have accepted that I may never own my own home. I think it’s become a fact of life for young people. More terrifyingly, if I’m renting long-term and was to lose my job or not be able to work for a period of time, I would struggle to pay rent.” – YWCA Australia Young Women’s Council member (speaking to ERA, 2021)

Young adults aged 19 to 24 years have the highest rate of homelessness of any age group. Young adults under 35, even those in early professional careers, are staying in the family home longer because housing has become so unaffordable.³⁷

Young people are at a severe disadvantage in the housing market as they tend to work in jobs that are lower paid, often part time or casual and may be combined with study commitments.³⁸

For young women there are additional barriers: a highly segregated workforce with sectors dominated by women earning less and greater risk of sexual and other violence in the workplace and at home.

In addition to increasing supply of housing that is affordable and well-located, younger women need the Plan to recognise the value of:-

- Providing housing solutions for young people who are homeless or at risk of homelessness (especially youth aged 12–24) - tailored to provide for their safety, and not merged within more general accommodation for the adult homeless population.
- Strengthening rental protections for tenants by providing for longer leases, setting minimum accessibility and energy efficiency standards, and removing no-fault evictions. This is a measure that is important, regardless of age and gender.

3. Single mothers: Solutions to consider

While expensive house rents and purchase prices are a concern for all, women, particularly single women with children, face extra barriers accessing safe and affordable housing.

Women are much more likely to be raising a child on their own ([80% of Australia's one million one parent families are single mothers](#))³⁹ at a time when there are also more single parent

³⁷ AHURI (using data provided by the ABS) 2023. "What are the real costs of the housing crisis for young people". <https://www.ahuri.edu.au/analysis/brief/what-are-real-costs-housing-crisis-australias-young-people>

³⁸ The Australian Government, Treasury (September 2023), Working Future: The Australian Government's White Paper on Jobs and Opportunities. Page X Executive Summary. Young people aged 15 to 24 years face an unemployment rate twice the unemployment rate for all Australians.

³⁹ ABS, 2022 Labor Force Status of Families. <https://www.abs.gov.au/statistics/labour/employment-and-unemployment/labour-force-status-families/latest-release>

families than ever before.⁴⁰ Further, a lack of affordable housing is keeping women and children in unsafe homes.

- Single women with children need improved access to affordable housing with safe, secure tenure.
- New public and social housing should be designed to cater for their specific needs so their homes are safe environments for them and any dependent children, with houses of different sizes appropriate for their family and with location to services and transport and physical security included as key features.

Another recommendation in this area is for more shared-equity schemes to assist women with moderate incomes, especially those who have experienced separation.

What about disability, race discrimination and LGBTI+ discrimination? If we don't have time, don't worry, but we would normally want to say something about this. We would also want a very clear statement about intersectionality somewhere.

⁴⁰ Wendy Tuohy, *Sydney Morning Herald*, 2022, "Single-parent families crack the 1 million mark for the first time."