

# NATIONAL HOUSING AND HOMELESSNESS PLAN

**ISSUES PAPER SUBMISSION** 

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# Acknowledgements

Community Industry Group acknowledges the traditional custodians of this land, and their Elders past, present and future. We acknowledge and respect their continuing culture, the world's oldest living culture, and the contribution they make to the life of this region and our country.

We recognise the strength, resilience and capacity of Aboriginal people.

Community Industry Group extends our gratitude and heartfelt thanks to our members and other service providers who openly shared their experiences of homelessness and housing instability with us through surveys, consultations, or other methods. Your perspectives are invaluable in identifying the impact of the ongoing housing and homelessness crisis on individuals, families and communities experiencing vulnerability and disadvantage.





# **About Community Industry Group**

Community Industry Group (CI Group) is the peak body working for community services and organisations in southern NSW. We support community organisations, promote expertise and innovation in community development, foster industry development and advocate for social justice.

For 30 years, CI Group has taken a leadership role in the local community services sector. We regularly engage with those organisations, services and individuals who work with individuals, families, and communities experiencing disadvantage and vulnerability. We also advocate on behalf of community organisations and vulnerable communities to raise awareness of the issues which are impacting service delivery and affecting the lives and outcomes of individuals, families and communities experiencing disadvantage.

Our members include not for profit service providers who deliver:

- Homelessness Supports
- Women's and Domestic Violence Support Services
- Child and Family Services
- Youth Services
- Aged Care
- Disability Services
- Generalist Community/Neighbourhood Centres



# **Key Recommendations**

While CI Group members welcome the \$10 billion dollar Housing Australia Future Fund and the additional \$3 billion in spending on public and community housing separate from the Fund, we call on the National Housing Plan to specifically address funding allocation, eligibility and measures to prioritise investment in regions like the Illawarra, South Coast and Southern NSW.

Our not for profit members encounter a range of challenges that are different from those experienced by metropolitan service providers, developers and community housing organisations, and therefore any Plan must outline how these regional challenges will be recognised, capital funding allocated and solutions roll-out.

Our submission outlines the challenges our services and housing providers are facing and put forward short term and medium-term recommendations for the architects of the National Plan to consider and implement.

One key imperative for regional and rural communities is that the National Plan must allow for diversity in housing supply, delivery models and support service models, as many not-for-profit organisations like those operating successfully in our region require direct support to deliver new housing stock and to grow service provision to support tenants.

We emphasise the need for tailored place-based solutions as larger-scale developments that are effective in metropolitan areas simply won't work in regional settings where the demands and scale will not attract commercial or investment operators at the numbers needed to meet the shortfall.

CI Group call on the Federal Government to consider and implement the following key recommendations:



# **Key Recommendations: Supply**

Ensure regional, rural and remote areas are explicitly differentiated and dealt with in the National Plan.

Provide capital funding for the creation of diverse housing stock in regional areas, including a mix of affordable-for-purchase for people on low-income, affordable rental, and social and community housing to meet the growing needs of these communities. All new stock should be built using universal design principles to increase housing options for people with disability and enable ageing in place.

Work with the states and territories for an urgent moratorium on the further loss of social housing in regions through sale or redevelopment of existing dwellings, and ensure any future social housing transfers or redevelopment is guaranteed to result in a net gain in social housing dwellings.

Fund the expansion of existing housing services, health services and social support services. Make the sector more attractive to current and prospective workers and fund measures to incentivise support workers moving to take up work out in these areas.

Increase the availability of affordable housing by providing capital for targeted investments in regional and rural areas, develop incentives for existing housing providers and encourage partnerships with private developers and community housing organisations to deliver mixed-model housing options as quickly as possible. This should include capital/infrastructure funds for the delivery of affordable retirement living rental properties, low entry contribution residential aged care and medium-term supported housing for young people aged 16-24 to meet growing needs in these cohorts in regions.

Increase funding for emergency and transitional housing options to provide immediate relief to individuals and families facing homelessness.

On a region-specific basis, CI Group supports the modelling and recommendations made in the 'Illawarra Shoalhaven Affordable Housing Strategy' prepared by Judith Stubbs and Associates for Business Illawarra (February 2023) and support their call for progressive funding of at least an additional 3,925 social housing dwellings by 2041 to maintain the current regional rate, including at least:

- 1,940 additional social housing dwellings in Wollongong LGA;
- 807 additional social housing dwellings in Shellharbour LGA;
- 219 additional social housing dwellings in Kiama LGA; and
- 901 additional social housing dwellings in Shoalhaven LGA;



# **Key Recommendations: Supply**

Ensure 70% of new dwellings cater to couples without children i.e., one- or two-bedroom apartments or homes. The remaining 30% should accommodate families with children.

Set measurable targets for increasing the availability of affordable and supportive units of housing over a specific time frame to address homelessness at its root.

Work with states, territories, and local government to better regulate the short-term rental market to help free up the more than 1 million properties that were sitting empty in 2021 (Australian Bureau of Statistics Census 2021)

Provide funding to retrofit and repurpose existing buildings or facilities to create temporary or transitional accommodation options.

Enforce inclusionary zoning policies, mandating a percentage of affordable housing units in new developments and offering incentives for developers to exceed the base requirement, such as tax breaks, reduced impact fees and non-financial incentives like increased floor-space ratio and reduced parking requirements.

Work with state government to fund improvements to local public transport in areas like the Shoalhaven and South Coast to improve connectivity in and between regional areas.

Include provision in the National Plan to encourage partnerships with the private sector to leverage resources and expertise, explore innovative financing models like social impact bonds or community land trusts as funding pathways for more social and community housing, and offer grants and incentives to developers who commit to rapid social housing delivery.

The National Plan must identify and outline how land and asset management should play a role in identifying government-owned or underutilised land for social housing and establishing land banks for future projects.

Where Commonwealth funding is already being allocated to major infrastructure projects, like the Shoalhaven Hospital precinct, and future education precincts, additional funding should be provided to states and territories to deliver build-to-rent accommodation in partnership with developers to deliver key-worker housing. The NSW Government's \$30 million Build to Rent Partnership with Landcom in our region is a demonstration of how such a program of funding could be distributed.

Provide Federal level funding for public education programs to overcome NIMBYism and ensure social and community housing is better integrated in our regions.



# **Key Recommendations: Services**

The National Plan should adopt a "Housing First" approach, prioritising the immediate provision of stable housing for individuals experiencing homelessness, followed by ongoing support to address underlying issues. This will provide clearer funding pathways for Federal assistance for services in our regions.

Expand and improve financial assistance programs to help individuals at risk of homelessness meet rent, utilities, and other essential expenses, thus preventing them from falling into homelessness.

Strengthen assertive outreach efforts to identify individuals at risk of homelessness and connect them to support services, including mental health counselling, addiction treatment, and employment assistance.

Stipulate that states and territories must facilitate regular meetings and collaboration among government agencies, service providers, non-profits, healthcare organisations, and other stakeholders to align efforts and share best practice in regional settings.

Adequately fund ongoing training for service providers and staff to ensure they have the skills and knowledge to collaborate effectively with individuals experiencing homelessness, addressing trauma, mental health, and addiction.

Strengthen mechanisms for ongoing evaluation of programs and services, using data more effectively to inform improvements and adjustments and to plan better for future needs.

Address the current 'bed-block' issue in the region by providing \$3.2million in funding over three years to support a range of demonstration projects aimed at getting people who are currently in hospital into residential aged care. This will have the flow-on effect of releasing residential housing stock for either rental or sale.

If the project proves successful, it can be rolled out more widely to other areas with ageing populations and bed block issues. This will free up residential stock (often much needed family homes now with only one resident) across the country which is currently often sitting empty while the older person is in hospital.

Increase the funding for current providers, and to encourage the growth of, culturally sensitive crisis response teams that can provide immediate assistance to First Nations individuals and families at risk of homelessness.



# **Key Recommendations: Services**

Better fund tenant support services within Aboriginal and Torres Strait Islander Community Controlled Health Organisations (ATSICCHOs) to assist with housing stability, rent negotiations, and preventing evictions.

Fund compulsory cultural competency training for all government agencies, sector services and providers to ensure all providers engage effectively and respectfully with Indigenous communities.

Incorporate the Priority Reforms from the National Agreement on Closing the Gap when establishing specific targets for First Nations housing outcomes and mandate the collection of precise data for evidence-based policies.

Enshrine the role of designated advisory committees that drive government investment and local housing policy, comprised of First Nations representatives with lived experience encompassing both youth and elders, community leaders, and experts, to provide timely advice and avenues for consultation for communities.

Create the designation of a dedicated hoarding and squalor case worker stream within specialist homelessness and housing provider organisations (including in aged care and youth services).



# Introduction

CI Group acknowledges the Australian government has introduced a series of significant measures to address housing and homelessness issues and congratulates government for the commitment to address this critical issue.

#### Notably, we recognise that:

- The Minister for Housing and Homelessness has gained a position in the Federal Cabinet, signalling increased attention to housing matters.
- The National Housing Infrastructure Facility has received a substantial boost of \$575 million, aimed at social and affordable housing, with a focus on fostering partnerships to attract private investment.
- Announcement of the establishment of a National Housing Supply and Affordability Council and creation of a \$10 billion Housing Australia Future Fund to construct 30,000 new properties in five years, addressing housing shortages and quality improvements.
- Additional initiatives like the Regional First Home Buyer Scheme, a new National Housing and Homelessness Plan with benchmarks, a National Housing Accord, and measures to encourage planning reforms and land availability.

Furthermore, we recognise that state and territory Housing Ministers have committed to proposing reforms, and the 2023-24 Budget includes incentives to promote home buying and build-to-rent developments.

These efforts on the surface collectively aim to tackle Australia's housing and homelessness challenges comprehensively however immediate action is needed to address the current housing crisis. The housing and homelessness challenges facing the Illawarra, Shoalhaven, and South Coast regions are urgent issues that demand urgent attention.

Our members are dedicated to assisting those facing a range of challenges. Housing is frequently a concern, and lack of safe, stable, and affordable housing often creates a barrier to accessing services to address key individual issues including mental health, domestic and family violence, and chronic health conditions. Supporting social and community housing not only benefits individuals seeking shelter but also proves to be a prudent economic investment, reducing impost on the health system, generating education and employment opportunities, and invigorating the economy.

Our submission addresses issues pertaining to housing, homelessness, social/community housing, First Nations housing and the issues of housing and homelessness as they pertain to vulnerable groups including older people and youth.



# Housing Issue

#### **Housing Affordability**

Housing affordability has become a pressing issue in the Illawarra, Shoalhaven, and South Coast region, particularly for individuals with low incomes seeking rental accommodation. The main contributors to this challenge have been the surge in people selling homes in the property market and moving to the region, the rise of the short stay holiday rental market and the rapid increase in property prices, outpacing the average rate of increase in the state. This surge in prices has made homeownership a distant dream for many residents.

Likewise rent has increased rapidly and the dramatic increase of property prices rises has further jeopardised long-term tenancy. Renting a two-bedroom apartment in areas like Shellharbour and the Shoalhaven has seen steep annual increases of 10.7% and 7.2%, respectively, far exceeding typical inflation rates. This situation poses significant difficulties for low-income individuals and families in securing stable housing without straining their finances.

The latest Anglicare Rental Affordability Snapshot revealed just 0.9% of properties for rent are affordable, leaving very low-income renters especially vulnerable and unable to afford even the median rent for a modest one-bedroom unit in the region. Purchasing cheaper strata dwellings as an alternative remains primarily accessible to high-income households, exacerbating the housing affordability crisis and limiting options for low-income individuals (Anglicare Australia 2023 Rental Affordability Snapshot).

Additionally, we have experienced an increase in short-term accommodation uses of existing dwellings (with the rise of Airbnb and similar online platforms) and the loss of those rental properties from the long-term rental market exacerbating the pressures of an already tight market.

We hope that the National Plan will address these multifaceted affordability challenges and roadmap ways to work with state and local governments to rapidly increase social, community, retirement and over 55s, First **Nations** and dedicated affordable housing for lowhouseholds income and essential workers.





These factors must be addressed to ensure equitable access to safe and affordable housing for all residents in the region and promote overall well-being and social equity.

#### **Housing Stress in our regions**

As reported in the 'Illawarra Shoalhaven Affordable Housing Strategy' prepared by Judith Stubbs and Associates for Business Illawarra (February 2023) it was estimated that in 2021 a significant number of households (22,700) with low, or moderate incomes were facing housing stress. Housing stress signifies a situation where a significant portion of a household's income is being allocated to housing-related expenses, leaving limited financial resources for other essential needs such as food, healthcare, and education.

Out of this substantial figure, approximately 78% of these households were specifically grappling with rental stress. Rental stress occurs when a significant portion of a household's income goes towards paying rent, making it challenging for them to cover other necessities. These households are often caught in a cycle of financial strain, where the rising costs of rent are making it increasingly difficult for them to make ends meet.

The remaining 22% of households in housing stress were experiencing what is referred to as purchase stress. Purchase stress is a condition where households, despite having the aspiration of homeownership, find themselves financially burdened by the costs associated with buying a home. This can include the deposit, mortgage payments, property taxes, and maintenance costs. For these households, the dream of owning a home is marred by financial difficulties, making it hard for them to achieve this milestone.

### Housing need for low-income renters

According to the 'Illawarra Shoalhaven Affordable Housing Strategy' prepared by Judith Stubbs and Associates for Business Illawarra (February 2023), around 60% of low-income renters in the region are single individuals or couples without children or with grown-up children who have left home. These households often prefer smaller, more affordable accommodation such as studio apartments, one-bedroom apartments, or small rental homes. These spaces are often budget-friendly and are easier and cheaper to maintain, which is advantageous for households with limited resources.

Conversely, the remaining 40% of low-income renters require housing suitable for families with children. Providing appropriate housing for families with children is vital, as inadequate housing can significantly impact children's well-being and development, affecting aspects like education, health, and overall quality of life.

Recognising these distinct housing needs among low-income renters is essential for policymakers, urban planners, local governments, and housing providers to consider in regional areas.



#### Affordable housing shortfall

Based on the 'Illawarra Shoalhaven Affordable Housing Strategy' prepared by Judith Stubbs and Associates for Business Illawarra (February 2023) the region is projected to require approximately 11,645 additional dwellings by 2041, reflecting changing demographics and preferences. This demand is predominantly for rental housing, constituting about 86% of the total need, driven by factors like housing affordability challenges and shifting lifestyle preferences. Of these rental households, a substantial 90% are expected to fall into the low-income categories, underscoring the urgent need for affordable housing.

In terms of housing composition, 70% of the new dwellings should cater to couples without children, ideally offering one- or two-bedroom apartments or homes. The remaining 30% should accommodate families with children, necessitating larger units with multiple bedrooms and family-friendly amenities.

Furthermore, the report identifies that, to maintain the current regional average of allocating 5.8% of dwellings for social housing, around 3,925 of the additional dwellings should be designated social housing. Social housing plays a crucial role in addressing housing insecurity and promoting social equity.

Addressing these projected housing needs requires collaboration between government bodies, developers, and community organisations. Comprehensive strategies encompassing zoning and land use policies, affordable housing initiatives, and targeted social housing investments will be essential. Meeting these demands is vital to ensure an inclusive, housing-secure, and thriving region in the coming decades.





It is important to note that housing challenges in urban areas differ significantly from those in regional and remote areas, and it is essential to consider these differences when designing housing policies to ensure their effectiveness and appropriateness for each context.

Policy considerations in urban areas include focusing on increasing housing supply through densification and mixed-use development, streamlining zoning and permitting processes, implementing inclusionary zoning policies, and developing affordable housing programs targeting low- and moderate-income households.

In contrast, regional and remote areas face supply challenges due to limited demand compared to urban areas, which can discourage private developers. Infrastructure and services may be lacking, affecting the feasibility of new developments. Workforce and skilled labour shortages also impact the building sector in regional areas.

Policies need to be tailored to the unique economic and social dynamics of the region, provide incentives for developers to invest in housing projects, support economic diversification and job creation, and invest in infrastructure improvements. Collaboration with local communities and First Nations groups is also essential to ensure culturally appropriate solutions.

Maximising the utilisation of existing properties is a vital strategy for addressing housing shortages and improving affordability. Governments can facilitate this through measures like property tax reform that encourage owners to use vacant or underutilised properties for housing rather than as investments. Another measure to be considered could be a vacant property tax which imposes a minimum number of occupation nights per annum in order to be classed as occupied and levies higher rates of property taxes on unoccupied properties, promoting their productive use.

Restrictive zoning can limit the number of housing units possible on a given plot, thus restricting overall housing supply. Zoning and land use rules may also prevent the conversion of properties or the repurposing of underutilised spaces for housing, further constraining potential supply. Additionally, the complexity and length of permitting processes can cause construction delays, diminishing housing supply as projects are held up in administrative procedures.

Zoning regulations that permit only larger, single-family homes limit the availability of more affordable housing alternatives such as multi-family units or accessory dwelling units (ADUs). Add to this public input and NIMBYism (Not in My Backyard) can lead to resistance against new housing projects, especially higher-density developments.

Incentives to encourage private property owners to develop affordable or social housing include:

- Density bonuses,
- Floor space ratio concessions,
- Expedited approvals,



- Parking requirement reductions (for developments centrally located with access to services and public transport),
- Property tax reductions or exemptions, and
- Grants, loans, or guarantees to repurpose vacant homes.

#### Other initiatives include:

- Empty homes registers which require multiple-property owners to make declarations of occupation to improve monitoring and enforcement.
- Home sharing programs which match homeowners with tenants to encourage mutually beneficial arrangements.

It is important that adequate key worker housing be provided as part of major employment generating projects funded by the Commonwealth, such as new hospital developments, creation or expansion of aged care facilities and tertiary educational institutions in the region. It is a crucial opportunity that should not be missed and would provide a model for the provision of key worker accommodation as part of other large, key worker generating projects. There is a precedent; nurses' quarters used to be provided regularly as part of hospital developments in regional areas.



#### **Short-Term Recommendations**

Work with state and local governments to streamline planning to expedite the delivery of social and affordable housing projects that are well-located near public transit hubs. This may include creating online application processes to speed up delivery.

Increase the availability of affordable housing through targeted investments, incentives, and partnerships with private developers and community housing organisations, including a mix of rental and ownership options for different income levels, combined with incentives for developers to include affordable units in their projects.

Enforce inclusionary zoning policies, mandating a percentage of affordable housing units in new developments and offering incentives for developers to exceed the base requirement.

Update zoning codes to allow for mixed-use developments and higher density in suitable areas. Incentivise the development of infill/adjacent property types – support local councils to encourage Accessory Dwelling Units (ADUs) where multi-generational living or rental units are created and cut the red tape to expedite.

Encourage adaptive reuse of existing buildings for housing.

Offer financial incentives, such as tax breaks or reduced impact fees, to developers who invest in housing projects in areas of critical housing shortage.

Promote mixed-use developments that combine residential, commercial, and retail spaces, creating vibrant neighbourhoods with access to services and jobs.

Ensure all future dwellings meet universal design principles to ensure they are accessible and modifiable to accommodate the needs of tenants with disabilities and support older tenants to age in place.

Collaborate with private developers to create joint ventures that leverage public land for residential development.

Continue to prioritise the Housing First approach for addressing homelessness.

Implement robust homelessness prevention strategies, including rental assistance programs, eviction prevention measures, rapid rehousing initiatives and increased access to wrap-around support services.

Focus on housing policies that promote equity, including targeted support for historically marginalised communities including First Nations people, and people with disabilities.

Work with the states and local councils to better regulate short-stay platforms like Airbnb to ensure short-term rentals are limited and more properties are put back into the long-term renting market.

Create an 'empty home' register of vacant properties and incentivise conversion of vacant to long-term housing.

Impose increased property tax arrangements for properties that remain vacant for extended periods.



#### **Medium-Term Recommendations**

Federal funding for key worker accommodation to be included in Commonwealth funded infrastructure projects such as new hospital developments, aged care facilities or tertiary educational institutions in the region.

Invest in transportation infrastructure (public transit, roads, bike lanes) to improve connectivity and accessibility to well-located areas.

Upgrade utilities, sewage, and other essential infrastructure to support increased residential development.

Incentivise state and local governments to develop comprehensive master plans that guide growth, ensuring a mix of housing types and preserving green spaces. This could include funding the early acquisition of land in well-located areas for future development, especially in regions like ours with limited available land.

Embed sustainable building practices, energy efficiency standards, and climate resilience measures in housing development to address environmental concerns.

Involve local communities in the planning process to ensure that new developments align with their needs and preferences.

Incorporate climate-resilient design principles to ensure that residential growth is sustainable and prepared for natural hazards.

Develop policies that enhance the quality and stability of the rental sector, such as standardising lease agreements, tenant education programs, and dispute resolution mechanisms.

Invest in robust data collection and monitoring systems to track housing market trends, measure policy effectiveness, and inform evidence-based decision-making.

Develop innovative home ownership assistance programs, such as shared equity models or down payment assistance, to help households achieve sustainable homeownership.

Implement incentives to encourage property owners to develop affordable or social housing including federally funded density bonuses, expedited approvals, and property tax concessions.

Provide incentives for developers to invest in projects along transit corridors.

Incorporate sustainable design standards into zoning regulations, emphasizing green building standards, energy efficiency, and sustainable materials.

Support urban renewal and revitalization programs, particularly in underutilized or blighted areas, with tax incentives and grants for developers involved in such projects.

Strengthen tenant protections, including rent controls, just-cause eviction policies, and regulations to prevent discrimination and unfair rental practices.

Accelerate the construction and rehabilitation of social housing units to address immediate housing needs, with a focus on those most vulnerable.



#### **Medium-Term Recommendations**

Foster partnerships with private sector stakeholders to leverage resources and expertise for housing development, particularly for affordable and social housing.

Develop comprehensive strategies to address housing affordability, including a mix of rental and ownership options for different income levels, combined with incentives for developers to include affordable units in their projects.

Develop policies that enhance the quality and stability of the rental sector, such as standardised lease agreements, tenant education programs, and dispute resolution mechanisms.

Review and enhance housing finance mechanisms, such as affordable housing bonds, subsidies, and grants, to support both public and private sector initiatives.

Offer tax credits for landlords who rent their property at affordable rates.

Mandate a percentage of all new rental developments which must be available and affordable to people on very low income.



# Homelessness

#### Regional and rural areas

Addressing homelessness in regional and rural areas requires tailored place-based strategies and collaborative efforts. People living with homelessness in these areas face unique challenges due to limited access to transport, resources, infrastructure, and services. There are fewer emergency shelters and supportive housing programs, making it difficult for them to find refuge, especially during extreme weather.

Access to basic services like healthcare, mental health support, addiction treatment, financial counselling and social services is often limited or difficult to access due to lack of transport and/or limited availability, exacerbating issues that destabilise and jeopardise ongoing tenancy.

Limited job opportunities, housing affordability issues, lack of public transport, and distance from social networks further complicate the situation.

CI Group members are consistent in their feedback to us that a multi-pronged approach is crucial to address homelessness in regional and rural areas.

Greater investment must be made in regional areas to prioritise prevention and early intervention strategies, which involve identifying individuals and families at risk of homelessness and providing targeted coordinated support, including financial counselling and rental assistance, to prevent housing instability.

Members are also united in their calls for better coordination between services. We highlight examples in the case studies that demonstrate dramatic improvement in outcomes when greater cooperation is fostered and a holistic approach funded to bring government agencies, housing providers, healthcare representatives, and social services to work together to develop

personalised plans and connect individuals to appropriate services.

Further, in a region with diverse communities, developing greater cultural competency within service staff is key, particularly when tailoring services to diverse populations like First Nations communities, LGBTQIA+ individuals, veterans, older people, and youth.





#### **Short-Term Recommendations**

Increase funding for emergency shelters and services to provide immediate relief for people currently experiencing homelessness. This includes safe places to sleep, meals, and access to hygiene facilities.

Implement rapid rehousing programs that offer short-term rental assistance and support to quickly move individuals and families from homelessness to stable housing.

Develop financial assistance programs to help individuals at risk of homelessness meet immediate expenses such as rent, utilities, and other essential expenses, to prevent them from falling into homelessness.

Strengthen assertive outreach efforts to identify individuals at risk of homelessness and connect them to support services, including mental health, counselling, addiction supports, and employment assistance.

Implement a portal like My Aged Care as a one-stop shop for people experiencing issues with their housing situation that can also be utilised by service providers, government agencies and healthcare professionals. To encourage utilisation, we strongly recommend this portal is not hosted by Services Australia (due to association with Centrelink) <a href="https://www.myagedcare.gov.au/">https://www.myagedcare.gov.au/</a>



#### **Medium-Term Recommendations**

Invest in the construction of units of affordable housing and increase the availability of subsidised housing programs for low-income individuals and families.

Establish and/or increase funding to build the capacity of comprehensive supportive services that address the underlying causes of homelessness, such as mental health issues, domestic & family violence, addiction, and unemployment, to facilitate long-term stability.

Introduce tenant protections to prevent evictions and ensure fair treatment for renters, including rent control measures, just-cause eviction policies, and legal support for tenants facing eviction.

Fast track the development of land use policies that encourage affordable housing development, mixed-income communities, and zoning changes that promote housing diversity.

Implement early intervention programs that target individuals and families at risk of homelessness, providing them with necessary support before they lose housing.

Focus on providing targeted support for young people and families experiencing homelessness, including access to education, family counselling, and youth-specific housing options.

Establish a dedicated funding stream to support homelessness prevention initiatives. This must allow for flexible and responsive localised approaches to address individual and community needs.

Collaborate with local businesses and organisations to create job training and employment programs that can help people who are homeless or at risk of homelessness to secure stable employment.

Recognise that it is impossible to address the underlying causes of homelessness until the person has a safe and stable place to live. Adopt a "Housing First" approach, which prioritises the immediate provision of stable housing for individuals experiencing homelessness, followed by ongoing support to address underlying issues.

Provide or expand on a comprehensive network of mental health and addiction services that provide ongoing care and support for those experiencing homelessness or at risk of homelessness.

Implement education campaigns to raise awareness about homelessness prevention resources and services, targeting vulnerable populations before they reach crisis point.

Foster collaboration between government agencies, community organisations, non-profits, and the private sector to create holistic, sustainable solutions to end homelessness.

Expand housing voucher programs and subsidies to increase access to safe and stable housing for low-income individuals and families.

Use data analysis to identify trends, track progress, and refine strategies for homelessness prevention and support.



# Service Providers

Housing and homelessness service providers throughout the Illawarra, Shoalhaven, and Far South Coast regions play a crucial role in helping individuals access and maintain housing while offering comprehensive support to address the underlying issues that affect housing stability.

These services cater to various groups of people who are at risk of homelessness, including those currently residing in public, community, private, or other forms of housing. Their programs are designed to assist individuals on the brink of homelessness by supporting them to maintain their tenancy or transition to more suitable accommodations.

The experiences of the people our local providers assist have been provided as examples of the experiences of the people who access their services, exhibiting a diverse range of characteristics and unique needs. These include:

- o Individuals facing chronic or persistent homelessness.
- Young people under the age of 24.
- o Individuals living with mental health and/or substance use issues.
- o People aged 55 and above.
- o Aboriginal and Torres Strait Islander people.
- o People from culturally and linguistically diverse backgrounds.
- o Individuals and families are or who have experienced domestic and family violence.
- People who identify as LGBTQIA+.

Service providers also extend their support to individuals already experiencing homelessness, whether they lack shelter entirely, are living in makeshift or inadequate housing, temporarily staying in short-term emergency accommodations, or resorting to couch surfing.

There are notable challenges and gaps in homelessness services in our regions:

- Homelessness services and crucial allied health/support services are often concentrated in urban areas, making them difficult to access for people without access to transport.
- o Inadequacy of prevention services aimed at addressing homelessness at its root causes in terms of number of service providers, capacity, and resources, resulting in many individuals at risk of homelessness being unable to access early intervention support.
- Coordination among service providers and government agencies is fragmented, making it difficult for individuals to access comprehensive support.
- Insufficient access to mental health and addiction treatment services which are often pivotal in addressing underlying challenges. Many mental health services and drug and alcohol services in the region have extensive waitlists.
- Vulnerable population groups like LGBTQIA+ youth, people escaping domestic and family violence, and people with disabilities find it difficult (or even impossible) to access tailored support.



#### **Short-Term Recommendations**

Overhaul the existing case management systems to facilitate collaboration and information sharing among service providers to deliver a seamless continuum of care for individuals experiencing homelessness or at risk of homelessness.

Establish data-sharing agreements and standards across agencies to ensure that accurate and upto-date information is available for planning, resource allocation, and measuring outcomes.

Create a centralised housing navigation service that helps individuals access appropriate housing options and support services based on their unique needs.

Implement a coordinated entry system that prioritises vulnerable populations for available housing resources, ensuring those with the highest needs are assisted first.

Develop and implement Housing First policies which prioritise the provision of stable housing as a foundation for addressing other challenges such as mental health, addiction, and employment.

Facilitate regular meetings and collaboration among government agencies, service providers, non-profits, healthcare organisations, and other stakeholders to share information, align efforts and share best practice.

Provide training for service providers to build skills and capacity around trauma, mental health, and addiction etc to enable them to collaborate effectively with individuals experiencing homelessness,

Set measurable targets for increasing the availability of units of affordable and supportive housing over a specific time frame to address homelessness at its roots.

Establish mechanisms for ongoing evaluation of programs and services, using data to inform improvements and adjustments.



#### **Medium-Term Recommendations**

Implement policy changes that address systemic issues which contribute to homelessness, such as housing affordability, access to vital supports including mental health, domestic violence and addiction services, and income inequality.

Enact or strengthen legal protections against discrimination based on housing status and provide tenant rights and renter protections to prevent evictions.

Foster community engagement and public education initiatives to reduce stigma and build support for housing solutions for individuals experiencing homelessness.

Develop comprehensive healthcare models that integrate physical health, mental health, addiction treatment, and other services to address the whole person.

Embed trauma-informed principles into service delivery to create safe and supportive environments that facilitate healing and recovery.

Secure long-term funding commitments from government bodies, philanthropic organisations, and private sector partners to sustain housing programs and services.

Implement policies that incentivise the construction of affordable housing and inclusionary zoning to ensure affordable housing is integrated into new developments.

Invest in programs that target prevention and early intervention to address homelessness risks before they escalate.

Encourage research and innovation in housing and homelessness solutions, leveraging technology, data analytics, and evidence-based practices.

Implement legislative changes that prioritise the rights and well-being of individuals experiencing homelessness, including access to services, privacy protection, and legal remedies.



### **Case Study: An Effective Program Addressing Homelessness**



Homelessness Mental Health Program (HMHP) – a collaborative cross sector initiative funded by NSW Health-Illawarra Shoalhaven Local Health District (ISLHD)

https://www.islhd.health.nsw.gov.au/services-clinics/homelessness-mental-health-program

The Homelessness Mental Health Program (HMHP) tackles homelessness and mental health issues through synchronized efforts that can alleviate the strain on emergency services, healthcare systems, and social services. At the core of the program is a cross-sectoral committee comprised of Health services, mental health services, community housing providers and non-government agencies. This committee receives and assesses referrals from service providers who are working with people experiencing homelessness or at risk of homelessness who also have a mental Health diagnosis.

This is a brokerage model which provides services or goods to help people experiencing mental health issues to either maintain their tenancy or move into a new tenancy. By averting crises and providing proactive support, the committee contributes to a more efficient allocation of resources. The positive outcomes of the HMHP extend beyond immediate results. Secure housing and enhanced mental health can pave the way for improved mental health supports, employment opportunities, educational achievements, stronger social bonds, and an elevated quality of life. Collectively, these factors contribute to breaking the cycle of homelessness and enhancing the long-term prospects of individuals. Community Industry (CI) Group has played an active role within the HMHP committee for several years.

The HMHP is an excellent example of regional collaboration to assist people who are most at risk of falling through the cracks. It is a last port of call for individuals who have complex circumstances and demonstrates a model of multidisciplinary and collaborative case management that works.

The National Housing and Homelessness Plan must address strategies to tackle mental health and housing concurrently.



#### The HMHP Model

#### Who:

We are a multidisciplinary committee consisting of representative from NSW ISLHD, Department of Communities and Justice, and non-government organisations working in the local mental health, housing, and homelessness space.

This committee operates a collaborative model of case management for individuals with mental health conditions who are homeless or at risk of homelessness, and tailors' solutions that address their mental health needs alongside their housing requirements.

#### Our why:

We acknowledge and recognise the impacts of homelessness on an individual's health and how health and wellbeing status contribute to a tenancy becoming at risk and to homelessness, and that health and housing are interrelated and often impact the most vulnerable in our district.

#### What:

We focus on homelessness and mental health and work towards supporting NSW government's commitment to halve street sleeping by 2025 and End Street sleeping by 2030.

We deliver activities that support clients and their referrers through co-case management and brokerage, consultation, advocacy and education.

#### Observations by the HMHP Committee:

We agree that homelessness is both a cause and a consequence of ill health. Dealing with housing/tenancy matters is often beyond the capabilities of clients who are struggling with health conditions or mental health concerns. If we want to assist people with mental health conditions maintain their tenancies and avoid eviction/homelessness, a holistic approach that tackles mental health support/solutions alongside tenancy issues needs to be taken.

One area where this disconnect is apparent in the current housing/mental health approaches to Hoarding and Squalor. Approximately 30% of the referrals we receive involve Hoarding and Squalor - a mental health condition which is increasingly leading to a tenancy at risk. Any National Housing and Homelessness Plan would be remiss if there was no inclusion of Hoarding and Squalor and what we do to fix it.

Currently there is limited understanding of the problem within the service sector and little support or funding to assist where Hoarding and Squalor are an issue. If we want to assist people with mental health conditions maintain their tenancies and avoid eviction/homelessness, a holistic approach that tackles mental health support/solutions alongside tenancy issues needs to be taken seriously.

Eviction procedures must be re-evaluated. Social housing providers should be working on a 'no evictions' framework, where additional resources are available to support people who have difficulty maintaining their tenancy to be able to continue living in their homes. Navigating the DCJ "products" and applications processes is often beyond the capabilities of clients who are struggling with housing and mental health concerns.

More housing first programs like Together Home would be of great benefit.



#### The impacts the Housing & Homelessness crisis is having on the HMHP

The increasing number of people who are becoming homeless is having an impact across the whole range of health services. People working across the health service are having to incorporate some knowledge of homelessness into their work, as homelessness is very much a present issue in health settings across the board. Hospital emergency departments, hospital wards, outpatient services, and community health are all seeing many more patients where homelessness is an issue. We are aware that emergency department presentations can lead to unplanned admissions, and longer lengths of stay in hospital.

The stress of impending or current homelessness often causes or exacerbates physical and mental health issues. People who are homeless are less likely to attend appointments, take medication, or manage their health issues. Often by the time they are receiving some attention for the health issue, the situation has become a lot worse and their recovery much more complex.

As a result of this, our program receives increasing calls from colleagues requesting assistance with working with their patients and seeking support for a resolution to the housing issues.

Our program is receiving more referrals for people who are facing homelessness but have no opportunity to address the reason for their eviction and are not able to find any alternative accommodation that is affordable for them.

There is a vicious cycle between trauma and homelessness – we see this in the referrals we receive. Trauma drives homelessness and homelessness increases traumatic exposure. PTSD is in the top three of mental health diagnosis referred to our service.

#### HMHP Client Stories/case studies:

How the HMHP works to break the cycle of homelessness and ensure individuals/families get the help they need to maintain a tenancy.

#### **Client Story 1.**

HMHP recently worked with a 27-year-old Aboriginal woman living with her three-year-old child. She was referred to the HMHP Committee by ISLHD Binji and Boori (part of the Shoalhaven Ante-Natal Health Service). The woman received a diagnosis of Depression and Anxiety following previous contact with ISLHD mental health services and was discharged from the acute mental health team to the care of her GP and a psychologist.

The committee identified that the woman required ongoing assistance and advocacy with her housing situation and identified some simple, practical brokerage support that assisted the woman to manage her mental health pressures and maintain her tenancy. In this instance, the committee purchased a washing machine and new bedding for her son, who was suffering frequent episodes of reflux at night and ongoing ear infections (he was awaiting grommet surgery) which made the task of caring for her son easier and lessened the mental stress of managing his health conditions.

Advocacy was provided to support a request to DCJ Housing for garden maintenance so her son could play safely in their garden, and ensure the garden was manageable and easy to keep in good order so as to pass housing inspections.



#### **Client Story 2.**

The committee received a referral in regard to a 38-year-old man living in a NSW DCJ Housing property. The referral was from the NSW ISLHD Mental Health clinician.

The man had lost his home in a fire and all his valuables were destroyed. He had transitioned from emergency accommodation to a NSW DCJ permanent property. However, with a diagnosis of schizophrenia and being on a Community Treatment Order, he required additional advocacy and assistance to maintain tenancy.

The committee identified that the man had been sleeping on the floor and this was compromising his mental health. Practical brokerage provided a bed and mattress to support the establishment of his new tenancy and the stability of his mental health.





### Case Study: Shoalhaven Women's Health Centre

#### http://shoalhavenwomenshealthcentre.org.au/

The case study below highlights that in regional areas, it is not just specialist homelessness services that provide support for people who are homeless or at risk of homelessness.

The National Housing and Homelessness Plan must acknowledge the role and importance of services like these in regional areas, where support is thinner on the ground. Adequate funding is vital to keep these services in operation.

#### Financial Counsellor:

A woman was referred to us by SAHSSI (Specialist Homelessness Service based in Nowra, NSW) as she had recently relocated from Lismore after leaving a domestic and family violence (DFV) relationship. The client stated she had entered this relationship hesitantly, but it provided a roof over her head for her and her son when there was no other option. Prior to this relationship, the client had been homeless and couch surfing since the floods in Lismore in 2020. Whilst her property wasn't flooded her landlord's was, and they wanted to move back into the client's rental property.

When the client first engaged with me, she was living in the Shoalhaven with her mum, her teenage niece (who is in her mum's care), and her 19-year-old son who has high care needs due to autism spectrum disorder (ASD) in a two-bedroom cottage. This housing situation was unsustainable, and she subsequently took on a private rental as it was her only option (the client is currently on the public housing waiting list) as the crowded conditions were damaging family relationships and contributing further to both her and her mum's mental ill-health.

The client has several mental health diagnoses and hasn't worked since October 2021 with her only income being Carer's Payment and Allowance for her son. Her son receives Youth Allowance.

They are paying 47.6% of their combined income in rent. She is also paying \$52/week for a storage unit in Lismore which she took on when she became homeless after the floods. She needs to get to Lismore to clear this out but can't afford the petrol and accommodation to do this and the thought of this process is overwhelming due to her mental ill-health.

With our assistance both the client and her son are in the process of applying for Disability Support Pension (DSP). This will help financially, and assist maintain a stable tenancy but would not have been possible without the assistance of our financial counselling.





# <u>Case Study: Our Community Project Port Kembla – a Not-for-profit</u> Community Centre

https://www.ourcommunityproject.org.au/

'Margaret' (not her real name) is a single mother of 3 children ages 5, 7 and 17 who fled the North Coast due to FDV. Margaret has a possible undiagnosed disability which she advised affects her learning and communication. Margaret was also open about her mental ill-health and is suffering from trauma-related mental health issues. She has no current support systems in place, no family within the Illawarra area or connections to local support services.

Margaret is currently going through court for custody of her 3 children and attended our organisation for a No Interest Loan Scheme (NILS) loan as she previously had loans through her local area provider. During the conversations, Margaret was linked with a local NGO to support her and her family. She has recently been housed in temporary accommodation through DCJ Housing but does not feel this was an appropriate setting for her and her children.

Margaret found out the day prior to the NILs appointment that she had gained alternate temporary accommodation at a local woman's refuge, however due to the age and gender of her children she will have to consider splitting her family up and send her children back to the North Coast. Clearly this is something she did not want to do.

Margaret was given information about relevant support services in the area. Margaret was supported with a referral to local NGO Family Services Australia to provide tailored support through a family support caseworker to help her work through these many issues, so she is not tackling these issues on her own.



### **Youth Homelessness**

Homelessness among young people is a complex issue characterized by unique challenges that demand tailored solutions. Many homeless young people do not conform to traditional stereotypes, often engaging in "hidden homelessness" by couch-surfing or relying on temporary arrangements with friends. Identifying and assisting these individuals requires a more nuanced approach.

Understanding the root causes of youth homelessness is critical. Factors such as family conflict, aging out of foster care, LGBTQIA+ discrimination, economic hardship, or mental health issues can contribute to their housing instability. Addressing these underlying issues is essential to providing effective support.

Education is a key concern for young people experiencing homelessness, as they often experience disruptions in their schooling. Providing and funding additional support while they undertake school, vocational training, or pre-employment training is crucial to helping them break free from the cycle of homelessness and unemployment.

Young people experiencing homelessness frequently grapple with mental health challenges and past trauma. Therefore, offering access to mental health services, counselling, and trauma-informed care is vital to their well-being. Ensuring access to healthcare services, including sexual and reproductive health, is essential for young people experiencing homelessness as they may be at greater risk for health issues.

Legal support is often required, with issues like emancipation, guardianship, or clearing criminal records impacting a young person's ability to secure housing and employment. Providing job training, life skills education, and mentorship empowers young people who are homeless to become self-sufficient and lead fulfilling lives.

A lack of safe, suitable, and appropriate accommodation for medium supported/transitional housing needs to be addressed in the Illawarra, Shoalhaven, and South Coast.

Building supportive relationships with mentors or caseworkers is vital, as many young people who are homeless have strained family connections and need alternative support networks. Preventive efforts are also critical, focusing on family mediation, LGBTQIA+ support, financial literacy education, and mental health services to help young people avoid homelessness in the first place.



#### **Short-Term Recommendations**

Implementation of a Housing First approach, which prioritises immediate access to stable housing without preconditions.

Ensure the National Plan addresses the specific and different needs or unaccompanied children and young people to design a housing and homelessness system that can more effectively respond to those at risk, or those already experiencing homelessness.

Build more medium to long-term supported/transitional housing that graduates young people up to 24 years of age to independence.

Incorporate the voices and perspectives of young people in the development of policies and programs which impact them to ensure that services are relevant and effective.

More government funding to be allocated to create and develop more "wrap-around" specialist services, including early intervention, to ensure homelessness does not become a cycle for young people.

Prioritise the development and delivery of more diverse housing solutions that better cater individual circumstances, like allowing families to stay/live, and that cater to young people with disabilities, or specific cultural requirements.

In regional and rural areas with smaller populations, services may not be culturally sensitive or accessible, posing barriers for diverse populations. Increase access to cultural training and resources such as translation services for generalist providers in these areas.

Invest in regional building programs that deliver affordable housing, as this is hindering young people transitioning from shelters to stable housing.

Ensure all services are required and funded to deliver trauma-informed care, which is crucial for supporting individuals who have experienced trauma in their journey into stable accommodation and healing.

Fund better access to legal support for tenants facing eviction or discrimination – this may be through greater online/digital access to these services. A lack of legal support often affects young peoples' ability to understand or exercise their rights, which has a big impact in regions like ours where the housing market is tight and vacancy rates are at an all-time low.

Gaps in data collection and analysis hinder trend identification, potentially leading to inadequate resource allocation and targeted interventions.



### **Disability and homelessness**

There is, overall, a shortage of crisis and transitional housing which is accessible and appropriate for people with disability. Increasing the availability of accessible crisis and transitional accommodation requires implementation of strategies which address both physical infrastructure and services provided. Retrofitting and accessibility modifications are essential to adapt existing shelters and accommodations, and these should be done in partnerships with accessibility-focused organisations and experts to ensure compliance with disability inclusion best practice and standards. Collaborative efforts with disability organisations and architectural firms experienced in universal design are crucial for creating solutions catering to diverse needs.

Funding allocation and grant applications targeted at retrofitting and modifications can provide resources for enhancing accessibility. Utilising modular housing units with built-in accessibility features and adaptive technology, like smart devices, can be swiftly deployed in high-demand areas. To ensure long-term impact, inclusive design guidelines must be integrated from the outset of new accommodations.

As has been noted previously, implementing a Housing First approach prioritises accessible permanent supportive housing, reducing reliance on crisis and transitional options. Collaborations with disability services, streamlined assessment and placement processes, and staff training are required to ensure individuals with disabilities receive tailored support. Advocacy through partnerships with disability advocacy groups can improve accessibility standards and regulations.

Temporary solutions can include repurposing vacant spaces for accessible accommodations while permanent options are developed. Engaging local communities for support and addressing concerns is vital, and data-driven approaches enable strategic deployment of accessible accommodations where demand is high.



## Homelessness and older people



### **Case Study: Age Matters**

Care finder service operating across the Illawarra and Shoalhaven regions of New South Wales.

https://www.irt.org.au/about/age-matters/

**Introduction**: Age Matters has been active in the older person's homelessness space as a Commonwealth Home Support Program (CHSP) provider and an Assistance with Care and Housing Program provider for over 20 years, supporting older people who are homeless or at risk of homelessness.

**Challenges:** The impact of the housing crisis is evident in the number of referrals from older people residing in private rental accommodation who are living on an aged pension and finding themselves in housing stress. The Anglicare Affordability Snapshot confirms that less than half a percent (0.5%) of private rental properties in the Illawarra are affordable for someone living on an Aged Pension. In addition, many older people are telling us they simply cannot compete with the process to access private rental with the increasing reliance on digital means to search for and apply for properties.

Factors contributing to housing and homelessness issues for older people, as seen by our service include but are not limited to:

- Private rental market affordability is outside of what people living on a fixed income can afford.
- Private rental market properties are not 'forever' homes and moving house for an older person takes a significant toll on their financial, health and mental wellbeing IF they can secure a property.
- Older people are presenting with multiple complexities in addition to their housing needs. These include frailty associated with ageing, history of trauma, mental ill-health, physical ill-health, isolation, vulnerability, elder/domestic/family/non-family abuse, cognition, etc.
- Many older people who are homeless do not see themselves as homeless. They are often transient, staying with friends (couch surfing) or housed in circumstances where they may be exchanging services for accommodation.
- Changes in relationships, including family breakdown.
- Many properties and accommodation options are unsuitable for an older person to age-in-place. This
  includes homes with many stairs, steep driveways, or isolated locations away from essential services
  or public transport.



- Hoarding and Squalor is a growing issue contributing to homelessness, including in social housing where older people may decline with age in their ability to look after their home environment. There are inadequate services to deal with Hording and Squalor.
- Specialist Homelessness Services funded through the NSW State Government are not equipped to straddle the ageing space. Temporary Accommodation is rarely suitable for an older person with mobility needs or a history of trauma.
- Specialist Homelessness Services have limited time or expertise in assisting older people to access the Aged Care system to support sustaining a tenancy if one can be obtained.
- The waitlists to access Residential Aged Care Facilities in our area are long. Residential Aged Care is rarely suitable as an answer to homelessness, however individuals who are homeless who may only have low clinical care needs contribute to the 'bed block' within our Health System as they cannot be discharged into homelessness yet there are no residential aged care facilities who are able to accommodate them.

In 2021 we secured additional CHSP funding to deliver the Assistance with Care and Housing program and tripled our output hours to support vulnerable older people access appropriate and secure housing and accommodation. In 2023 we became a care finder organisation and doubled our work force to a team of eight, supporting older people to access aged care and other appropriate services and supports. The 'other' appropriate services and supports forms a primary focus of our work, with 70-80% of our incoming referrals presenting with issues of homelessness and housing.

Despite significantly increasing our workforce to respond to the increasing demands for support, we are still operating at capacity. Our fellow care finder organisations operating in this area are also experiencing significant demand to support older people who are facing homelessness. In FY23 we supported almost 300 people to access services and supports. In FY24 we expect that number to increase, however with the complexity of circumstances and the wait times to access appropriate housing, we are also not meeting the demand as we fill the gap. Our care finders are increasingly assisting people to navigate through different temporary and transitional accommodation before a 'forever home' is available and services can be accessed to help them age-in-place. This journey is often interspersed with hospital visits and the need for creative solutions to address immediate needs that would be resolvable if the appropriate accommodation could be sourced earlier.

Age Matters as a member of the NSW Ageing on the Edge Coalition supports the establishment of a state-wide information service for older people who are homeless or at risk of homelessness. The funding and establishment of a service that sits across state-funded Housing and Health Agencies, modelled after the successful Housing for the Aged Action Group 'Home at Last' could deliver timely and appropriate immediate and preventative advice to older people.



#### Recommendations

Build more public and community housing that is age-appropriate and allows residents to age-inplace safely with appropriate support.

Provide specialised support within housing provider agencies to older people who may face barriers to complete the application process needed to access this type of housing.

Better protection for private renters in Residential Tenancy Law. With the proportion of older people living in private rental accommodation and the push for ageing in place as the only sustainable model for aged care, we need to see security of tenure for older people.

Government incentives and support for mixed model housing options, including assistance to providers to offer affordable retirement village rentals that offer security of tenure, or low incoming entry contribution for older people who have a modest amount of money to 'buy' into a Retirement Village. E.g., the Jasmine Grove village at IRT Kanahooka is specifically for older women and offers collaborative housing at an affordable price range. This development was only made possible through capital investment through a government grant.

Some Retirement Village providers are moving towards rental models within villages, however accessing information about how to enter these options and the benefits they provide seems to be on a case-by-case basis. If these options were provided some subsidisation or support (such as through a simplified NRAS scheme) we may see providers being able to offer more clarity and certainty to respond to the market demand.

Sustain and increase funding in supports such as care finders to ensure there is intensive, face to face assistance for vulnerable older people who would otherwise fall through the cracks. Investment in services such as care finders offers value for money in preventing strain on crisis, health, and aged care systems.

The Housing for the Aged Action Group 'Ageing in a Housing Crisis' report is an evidence-based report with key recommendations like the above. This report should be read and heard by all stakeholders with a vested interest in the impact our ageing population will have on our country.



#### **Seniors Housing**

Australia finds itself at the height of a profound demographic transformation, marked by an imminent surge in its senior population.

The current cohort of individuals aged over 65, numbering 4.5 million, is set to double by 2040, a revelation underscored by the government's intergenerational report. Within this rapidly expanding senior demographic, a prevailing trend emerges: a significant portion of these individuals are empty nesters longing for housing transitions, primarily directed towards downsizing their current residences. Regrettably, their housing needs often remain unmet, driven by the unsuitability of their existing accommodations.

To address this pressing challenge, a proposed solution involves the development of smaller, age-appropriate dwellings within secure communities accurately designed to prioritise accessibility, safety, and the cultivation of a vibrant community spirit. The core idea is to create an environment that aligns with the evolving lifestyles of seniors, fostering a sense of belonging and independence. By satisfying the housing needs of seniors in this manner, it is reasonable to envisage a noteworthy byproduct: a substantial number of larger, well-located houses becoming vacant. These vacated properties, designed to potentially accommodate 4 or 5 occupants, as opposed to the current 1 or 2 retirees per household, could be introduced into the housing market. This strategic approach may produce an efficiency surplus, promising considerable housing advantages for the wider population, whether through incentivising private developers or through direct government intervention to expand the spectrum of housing options for seniors. The consequent availability of housing resources across the community could deliver far-reaching benefits, alleviating housing shortages and potentially leading to a double positive outcome.

However, when benchmarked against nations such as the United States and New Zealand, Australia's current rate of seniors' housing stock per thousand people over 65, standing at approximately 6%, showcases a noticeable gap. In contrast, the US boasts a rate of 10%, and New Zealand impressively reaches 14%. Both these nations have taken proactive steps to encourage the development of suitable seniors' housing and to make government-owned housing more attractive to older citizens. This strategy, in turn, frees up more substantial government residences for larger families, addressing housing shortages at multiple levels.

Incentivising senior housing development, whether led by government entities, commercial enterprises, or nonprofit organisations, can encompass a range of measures. Planning allowances, facilitating the construction of smaller dwellings, and reducing parking and yard space requirements are potential incentives. Relaxing building height limits and offering tax offsets to buyers, developers, and investors can further sweeten the deal and stimulate senior housing projects.

The intergenerational report in Australia not only projects the growth of the senior population but also spotlights the anticipated tripling of the older seniors' cohort, individuals aged over 85 years, by 2040. Many of these individuals will require supported housing and aged care



services. Unfortunately, the development of aged care beds, especially in regional areas, has stagnated due to insufficient investment and incentives from the federal government.

Reinvigorating this sector, such as through the funding of an expansion of aged care services tailored to the needs of those over 80, could yield multiple advantages. It would not only provide housing solutions for older individuals in need of continuous care but also unlock housing resources as they vacate their family homes, no longer suited to their needs. This, in turn, could benefit younger generations grappling with housing shortages, all while proving a cost-effective alternative to constructing entirely new housing units.

The challenges associated with senior housing and aged care needs in Australia are undeniably linked to broader housing shortages. Tackling these issues through targeted policies, incentives, and strategic investments stands to enhance the quality of life for seniors while simultaneously addressing housing shortfalls in an efficient and sustainable manner. This integrated approach underscores the potential for synergy, as it addresses the unique needs of one demographic group while mitigating overarching societal challenges.





# Aboriginal and Torres Strait Islander Housing

Enhancing housing outcomes for Aboriginal and Torres Strait Islander people necessitates a comprehensive grasp of the cultural, social, and economic factors influencing housing access and stability. It is paramount to acknowledge the cultural significance of land, community, and extended family structures. Housing solutions for First Nations people must honour traditional practices and ensure cultural safety, with services that are both respectful and responsive to the unique needs of communities.

Recognising the historical trauma stemming from colonisation, dispossession, and forced removal policies is pivotal in addressing persistent challenges. Inclusion and representation play a pivotal role in addressing housing and homelessness challenges within First Nations communities.

Collaborative efforts with First Nations communities empower them to take the lead in crafting housing solutions with community ownership, participation, and decision-making. Tackling barriers to education and employment is essential, given that stable income and opportunities are integral to housing stability. The integration of social services to address underlying challenges also holds great importance. Cross-sector collaboration, encompassing health, mental health, education, and social services tackles holistic needs. Local employment and training opportunities contribute to skill development and economic growth.

Economic factors have a significant influence, and initiatives should aim to mitigate income inequality, provide affordable housing options, and facilitate access to financial support for First Nations individuals and families. Engaging First Nations communities in the planning and implementation phases guarantees culturally appropriate solutions. Supporting capacity building within First Nations community-controlled organisations fortifies their ability to effectively manage housing initiatives.

Greater inclusion and representation empower First Nations communities to steer housing solutions and policies at a local level, ensures local cultural protocols are respected during the process and enable First Nations entrepreneurs and tradespeople to help deliver work and education opportunities for community.

Trust, transparency, and mutual respect should be the cornerstones of collaboration, recognising expertise from all sides, and mandating inclusive and representative policy frameworks can help establish this trust.

Honouring self-determination involves acknowledging the right of First Nations communities to lead and manage housing initiatives in accordance with their cultural values. Genuine



consultation, marked by active listening to leaders and elders while respecting local customs, is a non-negotiable aspect.

Create policy which puts shared decision-making, involving government representatives and First Nations leaders, steers housing policies. Co-designing housing solutions with First Nations communities guarantees cultural appropriateness. Learning from successful First Nations-led initiatives and implementing land rights empower communities. Culturally sensitive monitoring and evaluation capture impacts accurately. Celebrating cultural identity and recognising strengths contribute to well-being. Continuously adapting to changing community needs promotes effective collaboration. By adhering to these principles, governments can work collaboratively toward self-determination, improved housing outcomes, and community well-being.



#### **Short-Term Recommendations**

Increase funding for emergency and transitional housing options to provide immediate relief to individuals and families facing homelessness.

Provide funding to retrofit and repurpose existing buildings or facilities to create temporary or transitional accommodations for First Nations communities.

Develop culturally sensitive crisis response teams that can provide immediate assistance to Indigenous individuals and families at risk of homelessness.

Fund tenant support services within Aboriginal and Torres Strait Islander Community Controlled Health Organisations (ATSICCHOs) to assist with housing stability, rent negotiations, and preventing evictions.

Fund compulsory cultural competency training for all government agencies, community sector services and providers to ensure everyone can engage effectively and respectfully with First Nations communities.

Priority Reforms from the National Agreement on Closing the Gap must be incorporated when establishing specific targets for First Nations housing outcomes, and collecting precise data for evidence-based policies must be mandated.

Establish a designated advisory committee to drive government investment and local housing policy, comprised of First Nations representatives with lived experience encompassing both youth and elders, community leaders, and experts, to provide timely advice and avenues for consultation for communities.

Ensure engagement methods are flexible, utilising workshops, storytelling sessions, and digital platforms to promote inclusion and participation from community and implement regular feedback mechanisms to foster trust and maintain sustained engagement with First Nations communities.

Establish transparent communication processes around policy and program development to ensure communities are consistently informed, engaged, and have the opportunity to genuinely influence outcomes. Communication should also highlight where community feedback has resulted in better outcomes and positive change.



#### **Medium-Term Recommendations**

Invest in the construction of new affordable housing units specifically designed for First Nations communities, incorporating cultural considerations and appropriate facilities.

Offer more flexible funding models that allow for more customised housing solutions that align with cultural values, extended family structures, and kinship systems and respect Indigenous connections to land and community.

Support First Nations community-controlled housing organisations to lead the development of housing projects tailored to local needs and preferences.

Facilitate secure land access and tenure arrangements for Indigenous communities to enable long-term housing projects and land management.

Provide funding and resources for skills development, training, and employment opportunities within Indigenous communities to enhance economic self-sufficiency.

Develop housing models that allow for intergenerational living and the continuation of cultural practices within Indigenous communities.

Collaborate closely with ATSICCHOs to create integrated housing and health programs that address holistic needs and promote well-being.

Implement policies that empower Aboriginal & Torres Strait Islander communities to take full control over their housing initiatives, from planning to management.

Support initiatives that secure land rights and title for Aboriginal & Torres Strait Islander communities, enabling them to manage and develop their lands and housing resources.

Develop infrastructure in remote and regional areas, including utilities, roads, and community services, to support sustainable housing development.

Prioritise education and training opportunities within First Nations communities to build capacity for housing management, maintenance, and development.

Invest in comprehensive data collection and analysis to monitor progress, identify trends, and inform evidence-based policies.

Ensure consistent, long-term funding commitments to support the construction, maintenance, and improvement of Aboriginal & Torres Strait Islander housing.

Implement ongoing cultural competency training for government staff and service providers working in Aboriginal & Torres Strait Islander housing initiatives.

Develop initiatives that integrate housing, healthcare, education, and social services to create thriving and healthy Indigenous communities.





# <u>Case Study: Waminda – South Coast Women's Health and Wellbeing</u> <u>Aboriginal Corporation</u>

Waminda - South Coast Women's Health and Wellbeing Aboriginal Corporation

#### https://waminda.org.au/

Case Study 1 and 2 demonstrates the importance of funding additional transitional housing stock in regional areas and of funding adequate wraparound human services which enable First Nations people to access housing, healthcare, education, and social supports in an integrated way to stabilise tenancy. It also shows what a First Nations-led service like Waminda is able to achieve in collaboration with human services in the region when First Nations inclusion and representation are prioritised in the development of scaffolding services. It also highlights the empowering impact this has on First Nations people accessing these programs and services.

#### Case Study 1.

Client entered in the Yanaga Gunyah program/transitional housing shared property accommodation to escape a very toxic environment where she was surrounded by drug and alcohol abuse with family members. The Client had her child removed due to previous substance abuse and is now working towards restoration.

Whilst in the transitional housing property, the client has been addressing her substance abuse whilst attending Waminda's SMART Recovery group and attending Drug and Alcohol counselling at Waminda. A condition of staying in the transitional housing property is that you remain abstinent from all drug and alcohol use and engage very regularly with your assigned caseworker to address issues and find safe and stable accommodation.

The client identified that she would like to work on her parenting skills and learn healthier cooking options to provide for her daughter when client can have her child restored back into her care. The program coordinator suggested to the client that she could provide house cooking lessons with the client along with budgeting and meal planning/prepping for the week. The client was excited for this as she stated that these are some of the things that DCJ wanted the client to address.

The client is now in the process of arranging with her caseworker from DCJ to have contact with her daughter after several weeks of not seeing her daughter. Waminda's caseworkers have noticed the remarkable improvement in the client's social and emotional wellbeing since being in the transitional housing property. The client had formed a very positive relationship with the other resident in the property.

The client's engagement is more meaningful, and she seems more confident, happy, and proactive with her family matters since entering the Yanaga Gunyah program. Client is now living in co-living accommodation and has successfully maintained that tenancy for the last 6 months and is on track for restoration.



#### Case Study 2.

The young client had moved into our Yanaga Gunyah shared transitional housing along with her 2-year-old son. The client and her child were previously living in overcrowded situation in her family home with her mum, stepfather, and teenage brothers.

The client is a young mum finding it difficult to get private rental due to her age and lack of rental history. The client was very proactive in trying to find private rental both in Sydney and the local area.

Whilst in the transitional housing property, the client engaged will with her Child and Parenting caseworker regularly. Through this consistent engagement with the CAPS caseworker, referrals were made to the Red Cross Parenting Program in Sydney plus services for when the client relocated for family support.

The Transitional Housing Officer completed regular programs in the home and the client was open to all programs that the Transitional Housing Officer offered. During the client's stay in the property, the client participated in living skills, cooking, budgeting, arts, and crafts. Client was also engaged in Playgroup along with her son with Waminda and attended regularly. They both enjoyed getting to meet new mums and bubs.

The client's application for social housing became active to relocate to the Sydney area to be closer to her extended family with whom the client has close ties. The client was offered a new 2-bedroom unit in the Western Suburbs area.

Being in the Transitional Housing accommodation along with case management support the client has shown that she is able to live independently and manage her finances. Client was very excited to start her new journey for her little family.

Case study 3 demonstrates how important adequate transitional housing that is culturally respectful and responsive is for young First Nations people, and how vital access to rental support services are in regional areas with incredibly tight rental markets. It also shows that First-Nations-led wraparound programs and services are vital to maintaining tenancy and establishing a good housing record for the future.

#### Case Study 3.

The client was referred to the Yanaga Gunyah transitional housing program due to the client facing unreported family violence in the home. The client, along with her 1-year-old daughter, left the family home to couch surf at different extended family's homes. The client recognised that this situation was not safe for herself and young child and contacted Waminda for support.

Being young, the client had no rental references, and this, along with limited income and debts, made it very difficult to gain private rental. Whilst at the property, the client engaged with her caseworker to apply for social housing and affordable private rental accommodation.

The client actively engaged with in-house programs along with other tenants to receive assistance in living skills, budgeting, and meal preparation. She was able to use the shared transitional housing accommodation to gain a rental reference.



Notably, the client's ability to parent in the shared accommodation made a positive impact on the other young client and her child that shared with in the transitional housing property. With the assistance of client's Family Support caseworker and transitional housing officer the client was able to be backdated for her social housing application.

The client was very proactive in applying for affordable private rentals with a glowing reference. Client was finally accepted for a private rental and was assisted by the Transitional Housing officer at the sign up for the lease with the real estate.

Client was very emotional for the assistance that was provided by Waminda to provide support and safe accommodation for herself and child.



### Social Housing

In NSW, there are 56,000 households on the social waitlist, and almost 4000 of them are in the Illawarra Shoalhaven.

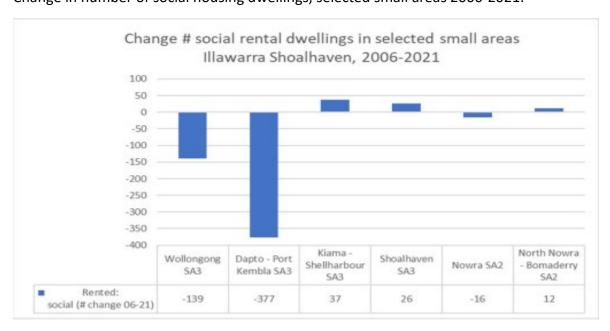
The affordable housing shortfall across the Illawarra Shoalhaven is expected to reach 11,645 by 2041, according to the Illawarra Shoalhaven Affordable Housing Strategic Options report that was launched in Nowra and Wollongong on Wednesday, July 26.

The report demonstrates our region is grappling with a critical issue: the substantial decrease in social housing, both in relative and absolute terms.

This decline includes a drop from 6% to 4% of dwellings between 2006 and 2021, with Kiama and Shoalhaven having even less social housing than the state average (1% and 3% versus 4% for NSW). Wollongong LGA saw a loss of approximately 525 social housing units from 2016 to 2021, causing extensive waiting times of over 10 years for most types of social housing in the area.

Recent Budget Estimates also highlight a significant reduction in social housing over eight years across the entire Region. This loss is mainly due to the failure to replace housing stock lost through sales and redevelopment by the NSW Land and Housing Corporation (LAHC), along with vacant properties resulting from poor maintenance. The most severe impacts have been in Shoalhaven, which faces a growing crisis of severe housing stress among very low-income renters and lost 8% of its social housing stock, in contrast to the statewide decline of 3.8% during this period.

Change in number of social housing dwellings, selected small areas 2006-2021.



Source: JSA 2022 derived from ABS 2021 and ABS 2016



#### Recommendations

The National Plan must foster intervention in local real estate markets – in the short-term the Housing Australia Future Fund is a welcome addition, but it must be targeted to consider regional areas like the Illawarra/Shoalhaven/Southern NSW even though construction costs are higher, and it is difficult to find labour to complete the builds.

Incentivise state and territory governments to cut red tape for social housing planning and building and incentivise the review and reform of local planning controls as a matter of urgency.

Incentivise state and territory governments to identify government-owned land that can be rapidly designated for social housing use.

Incentivise the use of existing rapid build/infill development of social housing by states and territories.

We welcome the \$300 million set aside in the 2023-2024 budget to upgrade around 60,000 social housing properties to save tenants money on energy bills and urge the National Housing Plan to set targets around and incentivise the roll out of the minimum standards for all future social housing through the Trajectory for Low Energy Buildings – residential to fast track the existing mandate to low-energy homes, to ensure all new social housing builds are as energy efficient (and low-cost to heat and cool) as possible, adaptive to climate change, and minimise the residential dwelling carbon footprint. These factors lower tenant energy bills, improve health and education outcomes and are especially important for already vulnerable populations.

Provide a mix of housing types to accommodate different family sizes, income levels, and mobility needs that is in good proximity to essential amenities, such as schools, healthcare facilities, public transportation, and community services to support residents' access to essential services. This model of mixed-income housing is necessary in our regions along the coast, as limited available land, high land values and cost of construction in outside metropolitan areas often hinders social and community housing developments. Ensure the location is sustainable and minimises ecological harm. Hazard risk assessments assess natural and human-made hazards like flooding or industrial risks, ensuring the safety and resilience of the development. Socio-economic factors, including job opportunities and social infrastructure, support the economic well-being of tenants.

Prioritise individuals and families with the greatest need, such as those experiencing homelessness, survivors of domestic and family violence, people with disabilities, and other vulnerable populations in the delivery of social housing.

Use all available data to best plan for the size of the household and the number of occupants when planning, building, and developing housing units to ensure that the housing is suitable for a households' needs.

Enshrine the consideration of housing costs in the National Plan as a percentage of income to ensure affordability and prevent housing stress.



#### Recommendations

Create policy that enables housing to be allocated with the availability of necessary support services, such as mental health services, addiction treatment, and counselling, particularly for populations with specialised needs.

Allocate housing to priority groups as defined by government policies, which might include veterans, Indigenous communities, seniors, or families with young children.

Consider the length of time an individual or family has been on the waiting list for social housing when making allocation decisions.

Strive for diverse and inclusive communities by considering factors such as cultural background, ethnicity, and gender identity.

Promote social cohesion by balancing the mix of tenants in a housing development to encourage community integration and reduce stigma.

Consider the unique needs of specific groups, such as survivors of domestic violence, people with disabilities, or those transitioning from correctional facilities.

Allocate housing to individuals and families who require transitional support, such as those exiting homelessness or leaving institutional settings.

Implement points-based systems that assign priority based on a combination of factors, including need, household size, and length of time on the waiting list.

Seek input from community stakeholders, including housing advocates, service providers, and tenant associations, when developing allocation policies.

Cultural sensitivity is crucial, involving engagement with First Nations communities to align the housing project with cultural values and traditions.

Regularly review and update allocation policies to ensure they are effective, equitable, and aligned with changing community needs.

Anticipate future growth and development in the area to ensure the project remains relevant. Long-term planning and funding should provide for adequate maintenance, renovations, and potential expansion based on expected population growth and evolving needs.

Data-driven decision-making, collaboration with experts in various fields, and designing for flexibility and adaptability will ensure a well-rounded assessment and suitability for both social housing tenants and the broader community.



#### Changes to be made to the current social housing system.

CI Group's members are united in their calls for improvements to the current system and believe a genuinely tenant-centred approach is essential for creating effective and inclusive social housing programs.

#### Recommendations

Integration of support services from community organisations to address tenant needs comprehensively. Social housing providers should be funded to train and retain staff to more effectively identify and connect clients who require with support services to maintain tenancy.

Implement a preventative approach and equip Housing NSW staff to identify and refer at risk tenants to the relevant support services. Systems should be established that allow for referral as early intervention programs help individuals and families at risk of homelessness. Include performance measurement using outcome metrics drives continuous improvement and accountability.

Long-term funding commitments ensure the stability and growth of social housing programs, sustaining their positive impact on communities and individuals.

The staff turnover within social housing sector is very high, and staff retention must be a priority. The Federal government could fund an addition week of annual leave to attract staff and provide adequate rest to avoid burnout. The Federal government should also fund increases to service providers, particularly at management levels.

All staff working for community housing providers should have training in community service. We note many working in CHP come from a real estate background, and all staff must be trained in trauma-informed practice before they are able to work with vulnerable client groups.

Fund innovative finance mechanisms like social impact bonds which can attract private investment.

Use analytics more effectively to make data-driven decisions and allocate resources efficiently.

Streamline the existing digital application processes to simplify social housing application.

Community outreach programs to be funded with all new builds to foster acceptance and integration, and to reduce stigma.



#### Wrap-around supports.

Wrap-around supports play a crucial role in assisting Australians in social housing by addressing their diverse needs and challenges. These comprehensive services go beyond housing to provide holistic assistance to tenants, contributing to tenancy stability and improved well-being helping to address some of the underlying contributors to housing instability.

Effective wrap-around support models often involve collaboration between housing providers, government agencies, non-profit organisations, and community partners. We refer back to our successful Homelessness Mental health Program to see how existing successful models of Housing First can serve as an example to scale up and implement for comprehensive tenant assistance.

#### Recommendations

Increase funding in regional areas to expand existing wraparound services. Recognise that regional areas often have less service providers available, and a greater geographic area to cover. Providers face challenges attracting and retaining qualified staff, and funding should be provided to to attract, house, and retain staff for these expanded services.



## **Community Housing**

Similar to the challenges and recommendations outlined in the above Social Housing section, the community housing sector will play a vital role in addressing housing availability, homelessness, and providing stable housing options for vulnerable groups in our regions.

While housing outcomes are primarily a state/territory responsibility under the Australian constitution, only with the active participation of both the Commonwealth state/territory governments can any effort to significantly expand social and affordable community housing succeed.

#### Capacity and capability constraints impacting on future growth.

The community housing sector faces a multitude of challenges that can impact its ability to provide adequate housing and support services. These include:

- Limited funding and intense competition for resources current constrains the sector's capacity to acquire and develop new housing properties, as well as maintain existing ones while offering essential tenant services.
- o A shortage of skilled professionals, including property managers, social workers, and maintenance staff, further hampers the sector.
- Smaller community housing organisations grapple with complex regulations and compliance obligations, resulting in administrative burdens. Moreover, accessing affordable capital for property-related activities proves difficult, impeding expansion efforts.
- O Upfront compliance and application costs are prohibitive for smaller and regional providers. Dedicated funding and/or exemptions should be enshrined for not-for-profit housing providers. This funding will encourage a diversity of housing as it will allow smaller providers to build housing to meet specific local needs. It will also ensure these costs are not a barrier to the delivery of new housing stock in non-metropolitan areas.
- The current funding system favours "shovel ready" projects and this is often very difficult for smaller, regional and rural providers to deliver given their size and financial constraints.

Collaboration gaps between community housing entities, government agencies, and stakeholders hinder collective impact and growth potential. Scaling operations remains a challenge for smaller organisations due to limited resources and capacity. Establishing community trust and involvement in affordable housing initiatives faces obstacles, particularly when facing resistance.

Further, a Federal government funded program to counter negative perceptions and stigma linked to affordable housing and specific tenant groups needs to be undertaken to build community support for expansion and allow the sector's growth.



#### **Short-Term Recommendations**

It is crucial to establish clear and consistent national standards for the quality, upkeep, and tenant support services in community housing to ensure a basic level of service for all residents.

The National Plan must include ways housing providers in regional and rural areas can access capital funding and cover design and application costs upfront to ensure new housing stock is built and that individuals and families needing housing in non-metropolitan areas are not left behind.

To measure progress, the development of performance metrics and benchmarks is essential, allowing stakeholders to gauge the performance of community housing organisations.

A national standard of tenant involvement and protections should be outlined in the National Plan to ensure decision-making processes about housing management and community development give tenants genuine input.

As with social housing, approval processes for new community housing developments, renovations, and funding applications should be streamlined and fast tracked to stimulate delivery of community housing.

Incentivise private investor involvement in community housing, through measures such as tax credits or exemptions, to assist in attracting funding, particularly in regional areas where builds may be more complicated and returns may be lower.

Allocating a portion of all new housing developments as affordable or community housing through regulations can help address housing shortages.

New housing units should be developed on universal design principles to ensure accessibility for tenants with disabilities and enable older tenants to age in place.

CHPs should be encouraged to form partnerships with various service providers, including specialist homelessness services, health services, disability support services, and cultural community organisations in regional areas to encourage proactive outreach.

Fund community housing providers for dedicated specialist tenancy workers who are trained to recognise issues and respond appropriately, embedded within their organisation. These specialist positions have the skills to identify issues that could potentially disrupt tenancy (i.e., addiction, hoarding, depression) and connect tenants to professional help to ensure those with complex needs can access coordinated services. This is particularly necessary when dealing with vulnerable people like those who have experienced/are experiencing domestic and family violence, young people, older residents, and those with mental health conditions.



Facilitate improved data sharing and integration systems among CHPs and support services to streamline assessments and referrals and improve accountability to support a tenancy-first approach.

Provide training in anti-discrimination laws based on factors like race, gender, sexual orientation, or disability to ensure fairness for all existing and prospective tenants. This will ensure all CHP staff are trained and equipped to be culturally sensitive and competent when collaborating with tenants from diverse backgrounds, including the provision of interpretation services and culturally appropriate resources.



