



Submission to the National Housing and Homelessness Plan

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Good Shepherd Australia New Zealand

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Acknowledgements

Good Shepherd Australia New Zealand acknowledges the Traditional Custodians of the lands and waters throughout Australia. We pay our respect to Elders, past and present, acknowledging their continuing relationship to land and the ongoing living cultures of Aboriginal and Torres Strait Islander Peoples across Australia. We recognise that the perspectives and voices of First Nations peoples should be at the forefront of conversations about family, domestic and sexual violence in Australia.

We remember, honour, and acknowledge former residents of Good Shepherd Homes across Australia and New Zealand. A childhood in the institutions was often full of social, emotional, and physical hardship, and we recognise the ongoing effects of this experience into adulthood. We hear your voices, we believe your stories, and we see your struggles – as well as your resilience. Let us take these next steps together to ensure past mistakes are never repeated.

We thank practitioners from Good Shepherd client services and colleagues from across a range of departments who generously gave their time and shared their ideas and practice wisdom with us and which we have incorporated in this submission. Their insights enhance our understanding of housing and homelessness for the most marginalised members of society.

About Good Shepherd Australia New Zealand

The Sisters of Good Shepherd was established in France over 400 years ago to respond to the needs of women and girls. The first program was a refuge that offered new possibilities for women and girls who were trapped in situations of poverty and exploitation who wanted to change their lives. Saint Mary Euphrasia Pelletier carried forward this mission, expanding internationally. We are now the largest, longest running organisation supporting women and girls, located in 73 countries, and with consultative status on women and girls at the UN. Good Shepherd has worked in Australia and Aotearoa New Zealand since 1863. We provide programs and services that support women, girls, and their families to be strong, safe, well, and connected. Our clients are at the centre of what we do. We are focused on responding to their emerging needs and on providing innovative, locally tailored responses. Our services are complemented by research, advocacy, and policy development that address the underlying structural causes of injustice and inequality to pave a way for a better tomorrow. We know one sector cannot disrupt the growing hardship in the community; we are building cross-sector coalitions to pursue our aims.



Executive Summary

Good Shepherd Australia New Zealand (Good Shepherd) welcomes the opportunity to provide a submission to the National Housing and Homelessness Plan (National Plan) consultation process conducted by the Australian Government Department of Social Services (Department).

Good Shepherd has a 160-year long history of working with women, children, and young people at risk of homelessness due to entrenched structural inequality, including poverty and family violence. Our practitioners from a range of client services report that they are witnessing increasing rates of clients experiencing or at risk of homelessness, including young, single mothers; victim-survivors of family violence, including children; young people on low incomes; and older women who face deep and accumulated financial disadvantage.

In this submission, Good Shepherd seeks to inform priorities for the National Plan based on the critical issues evident in our client services. Drawing on Good Shepherd data and practitioner insights from our national services, this submission responds to several sets of questions raised in the Issues Paper ([DSS, 2023a](#)). Recognising housing as the bedrock of women's safety and financial security, our recommendations focus on:

- Placing women, children and young people at the centre of a homelessness plan, including through recognising family violence as a significant driver of their homelessness
- Supporting family violence victim-survivors to stay in their existing homes, including more funding for Safe at Home initiatives
- Delivering large-scale supply of social and affordable housing, including through harnessing the assets and expertise of non-Community Housing Providers in the not-for-profit sector
- Supporting women to stay housed through a genuine Housing First model, including family violence-related protections
- Providing national leadership on rental protections, to make renting affordable, secure and safe for women and children

We also refer the Department to our earlier submission to the Inquiry into Australia's Human Rights Framework ([Parliamentary Joint Committee on Human Rights, 2023](#)), particularly our recommendation for a legislated human right to housing.

We welcome the opportunity to provide further evidence to the Department in relation to any of the matters raised in this submission.



Recommendations

Housing is the bedrock of women's safety and financial security

Recommendation 1: Integrate the National Housing and Homelessness Plan with the National Plan to End Violence Against Women and Children 2022–2032, the National Strategy to Achieve Gender Equality, and the report of the Inquiry into Australia's Human Rights Framework.

Place women, children and young people at the centre of a homelessness plan

Recommendation 2: Recognise and address family violence as a significant driver of homelessness among women, children and young people.

Recommendation 3: Set targets to reduce homelessness by 50 per cent over five years, and end homelessness over 10 years.

Recommendation 4: Increase brokerage funding and general funding to youth homelessness services to better meet the immediate and longer-term needs of young people experiencing or at risk of homelessness.

Recommendation 5: Take a prevention and recovery-focused approach to older women's homelessness, by identifying critical protective and sustainability factors for housing security over women's lifetimes and across housing systems.

Support family violence victim-survivors to stay in their existing homes

Recommendation 6: Commit to funding Safe at Home initiatives for family violence victim-survivors as part of the National Housing and Homelessness Plan.

Deliver large-scale supply of social and affordable housing

Recommendation 7: Set targets to build 25,000 social housing dwellings each year over the next 10 years.

Recommendation 8: Earmark long-term housing options for family violence victim-survivors when setting targets for new social housing supply.

Recommendation 9: Investigate and set targets for the supply of affordable housing over the next 10 years.

Recommendation 10: Integrate the National Housing and Homelessness Plan with the forthcoming National Energy Performance Strategy to ensure new social



housing meets 7.5-plus star ratings, and existing social housing is brought to at least 5-star equivalent before 2030.

Recommendation 11: Make provision in all funding programs for not-for-profit/for-purpose organisations which are not Community Housing Providers to be eligible to receive funding for the delivery of new social and affordable housing.

Recommendation 12: Adopt a mandatory approach to inclusionary zoning in partnership with the States and Territories.

Recommendation 13: Introduce a broad, multi-dimensional rental affordability scheme which can facilitate the development of new social and affordable housing across the affordability and household income spectrum.

Support women to stay housed through a genuine Housing First model

Recommendation 14: Commit significant capital and operational investment to a national Housing First program to deliver new social housing for this purpose, and associated support services, as part of a broader target to reduce, and ultimately eradicate, homelessness.

Make renting affordable, secure and safe for women and children

Recommendation 15: Prioritise private rental reform in the National Housing and Homelessness Plan and lead a national program of consistent regulations on eviction and rent increase protections, specialist family violence protections, the freedom to have pets, and structural and energy efficiency standards.



Our focus: housing is the bedrock of women's safety and financial security

Good Shepherd practitioners respond to the impacts of unmet housing needs and attend to the intersecting structural factors placing women, children and young people at risk of homelessness every day. From accommodating women and children escaping family violence in refuges; to locating appropriate accommodation for young parents with children; to supporting young people on low incomes, and families from multicultural communities; to advocating against the eviction of victim-survivors and their children, denied rights to adequate housing remains a core and pervasive issue for Good Shepherd clients.

Housing is the cornerstone of women's safety and financial security because it is a fundamental human need, children's and human right, and key social determinant of health ([World Health Organisation, 2013](#)). Our homes provide the living environment from which we pursue our lives and engage with the world around us. A safe, stable and well-located home with access to clean water, sanitation and energy provides the foundation for study, workforce participation, responsive parenting and the care of children, positive health and wellbeing, and violence-free lives. In this sense, a home is "not just a roof overhead but [a place] that encompasses all the services and amenities that [we] need for good quality of life" ([Mazzucato and Farha, 2023](#)).

Reflecting the interdependence of housing with other human rights and social determinants of health, the National Plan must therefore integrate with Australian Government work across portfolios and between States. The National Plan must work with and link strongly to other relevant strategies, including: the National Plan to End Violence against Women and Children 2022–2032; the National Strategy to Achieve Gender Equality (forthcoming); and the Inquiry into Australia's Human Rights Framework (forthcoming).

The National Plan will need targets and evaluation indicators that are tracked over time, enabling the Government and its partners to determine the collective impact, and course correct as needed ([Hanleybrown et al, 2012](#)). It is only through integration, mutually reinforcing activities, and shared measurement that we will be able to see systems change: shifts across sectors, in policy, organisations, community attitudes, and families.

Recommendation 1: Integrate the National Housing and Homelessness Plan with the National Plan to End Violence Against Women and Children 2022–2032, the



National Strategy to Achieve Gender Equality, and the report of the Inquiry into Australia's Human Rights Framework.

Place women, children and young people at the centre of a homelessness plan

Women are increasingly the face of homelessness: in the 2021 Census, women accounted for 81.7 per cent of the newly homeless ([Australian Bureau of Statistics, 2023](#)). However, women, children and young people are often neglected or overlooked in public perceptions and policy discourse of homelessness, which tend to be shaped by its most visible forms ([Batterham, 2020](#)): men squatting in improvised dwellings, sleeping in parks, or on the streets. Despite their visibility, however, 'rough sleepers' (who are predominantly men) make up only 9 per cent of the homeless population ([Australian Bureau of Statistics, 2023](#)).

What unites our clients, the majority of whom are women, children and young people, across different states, sites and service departments, is their experience of poverty and family violence, which is the biggest driver of women's homelessness ([Council to Homeless Persons, 2022](#)). Good Shepherd practitioners witness daily the continued policy neglect of the majority of those turning to homelessness services, including pregnant women (17 young women out of the 154 young people (11 per cent) we supported in the financial year 2022–2023), and young parents with children, who are victim-survivors of family violence.

Women and children have a right to live in safety and free from violence. Safe and affordable housing is a key element to fulfil this right and is central across the four domains of addressing family violence – prevention, early intervention, response, and recovery. Particularly in the response and recovery domains, victim-survivors need choices available to them to access safe and affordable housing. Having physical safety and security is a crucial first step to longer term, emotional and economic recovery. The needs of family violence victim-survivors must therefore be prioritised in a national homelessness plan.

In addressing homelessness, the National Plan should adopt a policy approach that shifts from a homelessness management approach, to one that aims to eliminate it. Good Shepherd supports the position of Homelessness Australia that the National Plan should commit to targets to reduce homelessness by 50 per cent over five years, and end homelessness over 10 years.

Recommendation 2: Recognise and address family violence as a significant driver of homelessness among women, children and young people.



Recommendation 3: Set targets to reduce homelessness by 50 per cent over five years, and end homelessness over 10 years.

Children and homelessness

Good Shepherd practitioners support a significant number of children and their mothers who are family violence victim-survivors. The Good Shepherd after-hours domestic violence outreach crisis response team serve women and children in the Bayside Peninsula area of Victoria. These services are also provided to women and children living in refuges and temporary accommodation. In the financial year 2022-2023, a third of clients assisted were children (391 adults – 67 per cent and 191 children – 33 per cent).¹

The intergenerational impacts of homelessness due to family violence on children cannot be overstated. Some are worth highlighting to convey how deeply unjust they are. Children living in refuge, temporary accommodation, insecure or inadequate housing are less likely to be able to do their homework, leading them to falling behind at school. They can also miss a large amount of their schooling due to being displaced, which further disrupts their education. In the long term, this is more likely to lead to low-income and unstable work, perpetuating intergenerational education, health and economic inequalities ([Stone and Reynolds, 2016](#)). Our practitioners also witness the ways in which housing insecurity particularly disadvantages disabled children.

Practitioner insights: Housing insecurity disadvantages children with disabilities the most

“Children with disabilities are less likely to be able to access early supports/intervention in their early years (aged 0-5 years), which then undermines their transition into mainstream schools, as specialist schools are regularly at capacity. Constantly moving between multiple refuges and houses when accompanying their mothers who are escaping family violence often also means a loss of access to NDIS services and support workers, which can lead to a cut in their funding when plans are reviewed later on.” *Youth Homelessness Team member*

Young people, young parents, and homelessness

Good Shepherd practitioners report that young people, especially young parents, are facing increasing barriers to securing safe, stable and affordable housing. This situation is reflected in the 2021 Census, which shows young women have a

¹ Data provided by Good Shepherd General Manager of Safety and Resilience Programs, extracted from SHIP client management system for financial year 2022-2023.



homelessness rate of 70 people per 10,000, compared with 19 people per 10,000 among older women ([Australian Bureau of Statistics, 2023](#)). These young women will become the homeless older women of the future unless decisive action is taken over the next 10 years to address young women's housing insecurity.

There is a severe shortage of age-appropriate housing for young people who are made homeless by family violence and other factors. Run-down motels are used by support agencies funded by government in the absence of proper crisis housing, exacerbating the risks to safety. Our practitioners report that there is limited oversight, compliance or governance regarding this type of temporary accommodation and how it is managed, for example, whether workers have police checks. Public housing, when it becomes available, is often unsafe and not suitable for young parents with children. Private rental housing is very limited and typically in poor condition. Young people and young parents are also increasingly excluded from private rental assistance programs due to being unable to afford rising rent payments, as well as stigma and judgement.

In response, Good Shepherd provides a short-term Youth Homelessness Service to young people in the western and northern suburbs of Melbourne, Victoria. The service provides support, information, advocacy and case management for young people aged 16 to 25 years who are experiencing or are at risk of homelessness. For each client, Good Shepherd practitioners record their support needs in case notes throughout the support period (three months). Across all the support periods in the financial year 2022–2023, practitioners recorded 14,761 needs² for 146 young people.

Good Shepherd also receives brokerage (Housing Establishment Fund (HEF)) for the Youth Homelessness Service; for example, to pay for crisis accommodation. In the financial year 2022–2023, Good Shepherd distributed \$17,651 to 42 young people. The HEF funding target is to provide 11 assists. Given the number of young people in need, Good Shepherd distributed fewer funds to more young people in order to assist them in setting up their homes. Table 1 details the percentage of needs identified across all support periods for our cohort of young people.

² The number of needs identified refers to the total number of times each service was identified in contact notes.



Table 1: Good Shepherd Youth Homelessness Service – support needs identified, and percent of support needs met

Support need	# needs identified	% of all needs	# supports provided	% needs met
Short-term housing	1,947	13.2%	3	0.2%
Medium-term housing	2,501	16.9%	0	0.0%
Long-term housing	2,364	16.0%	0	0.0%
Housing subtotals	6,812	46.1%	3	<0.01%
Assistance to sustain tenancy or prevent tenancy failure or eviction	332	2.2%	0	0.0%
Assistance for family/domestic violence - victim support services	182	1.2%	0	0.0%
Assistance to maintain or gain government allowance	34	0.2%	33	97.1%
Financial information	22	0.1%	10	45.5%
Material aid/brokerage	174	1.2%	59	33.9%
Court support	19	0.1%	13	68.4%
Advice/information	2,852	19.3%	2,847	99.8%
Advocacy/liaison on behalf of client	1,109	7.5%	1,024	92.3%
Other basic assistance	3,225	21.8%	3,210	99.5%
Total	14,761	100%	7,199	

Table note: Data extracted from SHIP for period 1 July 2022 to 30 June 2023. Clients can have more than one support need, and each need can be identified multiple times over the course of their engagement with Good Shepherd. Not a comprehensive list of potential needs – needs were listed if they were noted on at least 10 occasions.

What is clear from this data (Table 1) is that our clients have persistent and ongoing needs for short-, medium- and long-term housing (46 per cent of all needs identified). Despite our practitioners' best efforts, housing needs are largely impossible to meet under current limited housing conditions. While Good Shepherd is able to provide young people with advice and information, advocacy and liaison, and other basic assistance during the 3-month support period, it is also evident that the funding is insufficient to meet the identified material aid and brokerage needs of young people experiencing homelessness as only 33.9 per cent of these needs were able to be met.

Recommendation 4: Increase brokerage funding and general funding to youth homelessness services to better meet the immediate and longer-term needs of young people experiencing or at risk of homelessness.

Older women and homelessness

It is well-known that a lifetime of gendered financial insecurity has left just over 7,000 older women without a home ([Australian Bureau of Statistics, 2023](#); [New South Wales Parliament, 2022](#)). An alarming number of women are also at risk of



homelessness: about 240,000 women aged 55 or older, and another 165,000 women aged 45–54 ([Faulkner and Lester, 2020](#)).

Good Shepherd’s Financial Independence Hub program, which supports women to recover financially from family violence, is assisting a number of homeless older women, including women who are living in cars or staying with family and friends. Practitioners in the program have observed an uptick in these circumstances over the past 12 months due to very significant increases in rent and other essential living costs.

Practitioner insights: older women have a right to safe and secure housing after years of disadvantage

‘Jenny’, a participant in the Financial Independence Hub (FIH) program, is 63 years old. She escaped an abusive marriage after many years of family violence, and was then forced to quit her full-time job due to breast cancer. Faced with a lack of income and ongoing physical and mental health problems, Jenny became homeless. Jenny was connected with a housing and homelessness service, who were able to find transitional housing. Jenny was meant to be in transitional housing for 12 weeks but has been there for over a year, awaiting long-term housing that is affordable on her social security income. Jenny participates in the FIH Financial Coaching program. Her goals are planning for a forced retirement, understanding superannuation and pension entitlements, and planning for independent living, including budgeting and saving. Jenny is a strong and capable older woman. With a long-term home she will be able to recover from violence, and live a full and dignified life.

Reflecting practitioner experiences, the 2021 Census showed that older women are more likely than older men to experience less visible forms of homelessness, by staying temporarily with other households (26.7 per cent of older women compared with 19.6 per cent of older men), and living in severely crowded homes (30.5 per cent of older women compared with 17.7 per cent of older men) ([Australian Bureau of Statistics, 2023](#)).

The causes of this homelessness are multi-faceted and extend across multiple government portfolios. Older women have been made vulnerable to homelessness by pay and job discrimination, unpaid care work, and the resulting superannuation gap; very low social security rates; an over-reliance on property ownership in Australia’s retirement income system; and the long-term effects of family violence and relationship separation on women’s financial security ([New South Wales Parliament, 2022](#)). This underscores the importance of integrating



the National Plan with other key government strategies for gender equity, as proposed in Recommendation 1.

Social and affordable housing supply measures in the National Plan should prioritise housing for acutely vulnerable older women, whose health and safety are severely compromised by ageing without a home. These supply measures are discussed below.

More broadly, the National Plan should take a preventative approach to older women's homelessness, and identify key points to build protections against homelessness over women's lifetimes and across different housing systems. For example, reforms to the private rental system (as discussed below) would help to prevent women being pushed into homelessness, given rent increases and evictions are critical factors driving older women's homelessness and housing insecurity ([Power, 2020](#)).

Recommendation 5: Take a prevention and recovery-focused approach to older women's homelessness, by identifying critical protective and sustainability factors for housing security over women's lifetimes and across housing systems.

Support family violence victim-survivors to stay in their existing homes

A key choice that should be available to family violence victim-survivors is to stay safely in their existing homes, alleviating the need to find new social or private rental housing. This should be an option only if it is safe to stay, and when it is not, there needs to be other appropriate housing options for victim-survivors. The National Housing and Homelessness Plan should maximise the option of staying in existing homes by integrating with the National Plan to End Violence Against Women and Children, and by pursuing national rental reforms that provide specific protections for family violence-victim survivors and support them to stay in existing homes (discussed below).

Safe at Home models, such as the Department of Social Services' Keeping Women Safe in their Homes initiatives, support victim-survivors' choice to stay in their home if it is safe to do so ([DSS, 2023b](#)). This can be less disruptive, as it keeps victim-survivors connected to support systems and keeps child victim-survivors connected to their education and routines. Safe at Home models are holistic and involve an integrated services response, including case management, risk assessments and support for home security upgrades, which are essential to meet the many needs victim-survivors have ([Breckenridge et al, 2016](#); [DSS,](#)



[2023b](#)). Upholding perpetrator accountability is also central to these models ([Breckenridge et al, 2016](#)).

More funding to Safe at Home programs is essential to increase workforce capacity and create a more efficient system. This would also alleviate stress on the emergency family violence crisis accommodation services, and family violence case workers.

The principles of Safe at Home models can also be applied to the wider housing system, by undertaking rental reforms and increasing access to social and affordable housing (discussed below). Currently, the wider housing system is not trauma-informed or healing-informed, meaning it does not have an awareness of the ongoing impacts of trauma, and does not aim to alleviate any compounding effects that the systems can have. Good Shepherd practitioners are using a large amount of their case management time on housing advocacy, for example, to prevent evictions into homelessness. Time consuming advocacy for housing takes away from other case management goals that victim-survivors can have.

Recommendation 6: Commit to funding Safe at Home initiatives for family violence victim-survivors as part of the National Housing and Homelessness Plan.

Deliver large-scale supply of social and affordable housing

The primary aim of the National Plan must be a large-scale supply of social and affordable housing, to support the urgent needs of women, children and young people experiencing homelessness, and meet the needs of victim-survivors who cannot remain safely in their existing homes.

Similar to the young people in Good Shepherd's Youth Homelessness Service, it is near impossible for our practitioners to meet the long-term housing needs of women experiencing family violence. In 2022-2023, Good Shepherd assisted almost 12,000 women (including their 1,100 children) through our comprehensive family violence programs in Melbourne's south and west.³ Good Shepherd also operates a Core and Cluster refuge and independent properties for women and

³ Good Shepherd provides the following domestic and family violence services: case management; family violence program (The Orange Door); family violence flexible funding; family violence after-hours outreach crisis response program; refuge; early intervention funding; family violence counselling; and women's prison case management program.



children escaping family violence. In 2022–2023 we were able to assist 32 women and 45 children in our refuge.

Women and children’s support needs are recorded throughout their engagement with Good Shepherd. In 2022–2023, across both regions (west and south of Melbourne⁴), over 80,000 support needs were recorded (Table 2).

Table 2: Good Shepherd family violence services in Melbourne (south & west) – housing needs identified and percent of housing needs met

Housing need	# needs identified	% of all identified needs	# supports provided	% needs met
Short-term or emergency accommodation	485	0.6%	328	67.6%
Medium-term or transitional housing	1,605	1.9%	1,453	90.5%
Long-term housing	565	0.7%	5	0.9%
Housing subtotal	2,655	3.2%	1,786	67.2%
Victim support services	47,892	57.5%	44,961	93.9%
Advocacy or liaison on behalf of client	6,157	7.4%	5,499	89.3%
Material aid brokerage	5,170	6.2%	3,813	73.8%
Legal information	1,018	1.2%	793	77.9%
Child protection services	827	1.0%	790	95.5%
Advice or information	11,171	13.4%	10,697	95.8%
Court support	694	0.8%	581	83.7%
Parenting skills education	656	0.8%	563	85.8%
Education or training assistance	198	0.2%	173	87.4%
Other basic assistance	6,838	8.2%	6,760	98.9%
Total	83,276	100%	76,416	91.8%

Table note: Data extracted from SHIP for period 1 July 2022 to 30 June 2023. Clients can have more than one support need, and each need can be identified multiple times over the course of their engagement with Good Shepherd.

At our family violence programs, there were 2,655 housing needs recorded, and overall 67 per cent of those needs were met. Good Shepherd was most successful in meeting medium-term support needs (largely because Good Shepherd has a refuge in the south), whereby 91 per cent of the 1,605 needs were met (Table 2). However, women’s housing options become extremely limited beyond this point. Where long-term housing needs were identified, less than 1 per cent of those needs were able to be met. This highlights the need for much greater supply of long-term social housing options for women and children who have experienced family violence.

⁴ The Good Shepherd family violence program in the south (53,370 hours of service in FY2023) has greater capacity than the program in the west (5,262 hours of services in FY2023).



Set targets for a significant increase in social and affordable housing

Given the unmet housing need apparent among Good Shepherd's clients and in the broader community, the National Plan should set targets for the supply of new social housing that match the scale of this need.

Nationally, around 175,000 households are on social housing waitlists ([Morris, 2023](#)). In 2021–22, 25 per cent of public housing applicants had to wait more than 27 months for a home ([Productivity Commission, 2023](#)). In the inner west of Sydney, where Good Shepherd provides services to young parents at risk of homelessness, social housing wait times for general (non-priority) applicants are a decade or more ([NSW Government, 2022](#)).

Australia currently has almost 350,000 social housing dwellings, but many more are needed. The Australian Housing and Urban Research Institute (AHURI) estimates there is a current shortfall of just under 217,000 dwellings, and that an additional 547,000 dwellings are needed by 2037 ([AHURI, 2023](#)). However, only 20,000 social housing dwellings will be financed through the Housing Australia Future Fund over five years, and only 4,000 of these homes are earmarked for women and children affected by family violence, and older women at risk of homelessness. Social housing targets under the National Plan need to result in the building of around 20–25,000 social housing homes per year over the next 10 years, co-funded by Federal and State governments.

The National Plan should also set targets for the supply of 'affordable' housing in private markets, which is generally set below market rates or based on a household's income. The Housing Australia Future Fund will support 10,000 new affordable homes, and under the National Housing Accord another 10,000 affordable homes will be supported by the States and Territories. However, this total of 20,000 new affordable homes likely falls well short of the number of affordable homes required nationally. As at 2016 it was estimated that 80 per cent of very low-income private renters were paying unaffordable rents ([Hulse et al., 2019](#)); a figure likely to have increased given significant rent rises in recent years. The National Plan should therefore set targets for the supply of affordable homes in private rental and ownership markets over the next 10 years, which would provide a stable and reliable investment signal for private entities.

Recommendation 7: Set targets to build 25,000 social housing dwellings each year over the next 10 years.



Recommendation 8: Earmark long-term housing options for family violence victim-survivors when setting targets for new social housing supply.

Recommendation 9: Investigate and set targets for the supply of affordable housing over the next 10 years.

Set quality targets for social housing

Housing supply targets should be accompanied by housing quality targets, to ensure social housing has amenities that meet the needs of women and children over the lifespan. Good Shepherd clients living in social housing are grappling with substandard conditions. There are signs that people in public and community housing are resorting to No Interest Loan (NILs) debt to fund house repairs and install essential facilities such as hot water systems because they are not being provided by housing providers.

Good Shepherd also supports former residents of Good Shepherd Homes through a Comprehensive Aged Support Services program. Good Shepherd practitioners report that many of the clients within this program rely on public housing options that are not adequately maintained by government housing providers. For example, housing can lack basic features such as insulation and adequate heating and cooling. This drives up energy costs for older women on low incomes, and leaves them vulnerable to the health effects of predicted increases in severe heatwaves in the context of climate change. Practitioners spend significant time advocating to the public housing providers for basic improvements to their clients' homes, but report long delays in assistance and inadequate responses to housing deficiencies.

The National Plan should set targets for energy performance and thermal health in social housing, linked with the forthcoming National Energy Performance Strategy. While 2023–24 Federal budget measures will result in energy retrofits of around 60,000 social housing homes, this represents only around 17 per cent of all social housing. Along with ACOSS and other advocates, Good Shepherd calls for the building of all new social housing to 7.5-plus star ratings with renewable energy, and for all existing, viable social housing to be brought to at least 5-star equivalent before 2030 (see [ACOSS, 2023](#)). New social housing homes should be located with regard to climate stresses such as disaster risk and urban heat.

Recommendation 10: Integrate the National Housing and Homelessness Plan with the forthcoming National Energy Performance Strategy to ensure new social housing meets 7.5-plus star ratings, and existing social housing is brought to at least 5-star equivalent before 2030.



Harness the assets and expertise of non-Community Housing Providers in the not-for-profit sector

The scale of the current housing crisis in Australia means that each sector capable of contributing to significantly increased supply of new social and affordable housing needs to be activated to do so. The not-for-profit sector has potential to contribute to the supply of social and affordable housing in Australia.

Federal and State Governments' capital funding, operational subsidies and discounted debt finance have historically been focused on the community housing sector, which is mature (and highly regulated) in terms of the delivery and management of new social and affordable housing across Australia. A number of the larger registered Community Housing Providers (CHPs) are highly competent developers and managers of this housing, and some operate across several States and Territories.

However, the community housing sector in Australia has not yet achieved the scale of operations and capacity on a per capita basis as is seen in the United Kingdom, Europe, and even the 'sub-market' rental housing sector in the United States ([AHURI, 2023](#)). A large proportion of the sector does not possess development expertise, with its role being limited to small scale tenancy and property management.

Innovation insights: Affordable housing project in Marrickville, Sydney

Good Shepherd is currently investing \$20m of its own resources in an affordable housing project in Marrickville, Sydney. The project has utilised philanthropic donations, existing property, equity, debt finance, and is currently seeking government co-investment so the project can be scaled and replicated.

An integral part of the project is a co-design process managed on Good Shepherd's behalf by RMIT University, which is proactively consulting with the target cohort of women aged over 55 years who have experienced or are at risk of homelessness, particularly those from multicultural communities. Professional stakeholders including community service organisations, such as the Inner West City Council and others are also being consulted, given their knowledge of the target demographic and the barriers to accessing safe, secure, and appropriate housing in inner Sydney.

Extensive consultations inform both the built form design of the project, and the service model that will support residents to sustain the occupation of their homes and have the assistance required to live full and dignified lives.

Good Shepherd's Marrickville housing initiative is only one example of the substantial number of opportunities to deliver new housing if capital and



operational subsidy funding from Federal and State governments was made available to not-for-profit organisations.

Recommendation 11: Make provision in all funding programs for not-for-profit/for-purpose organisations which are not Community Housing Providers to be eligible to receive funding for the delivery of new social and affordable housing.

Mandate inclusionary zoning

The National Plan can further maximise supply of social and affordable housing by using planning systems. The National Plan is a timely mechanism for coordinating a cohesive approach to inclusionary zoning at Federal, State and local government levels. Inclusionary zoning is a viable way to significantly increase affordable housing supply (see [Gurran et al, 2018](#)). It could be mandated for new developments across Australia as a condition of planning approval, accompanied by incentives to make the approach viable for developers, such as modified planning controls in relation to density, height, parking etc, and reductions in or exemptions from costs associated with land purchases and planning processes.

The National Plan can draw upon existing inclusionary zoning approaches at State and local government levels, such as South Australia's mandate of 15 per cent affordable housing for all significant development projects. Over the decade to 2015, this requirement delivered 5,485 affordable homes, which accounted for 17 per cent of new supply in major residential developments ([AHURI, 2023](#)). England and Scotland require 20–40 per cent of new housing developments to be affordable, which has generated discounted ownership, shared equity, and affordable rental housing. For example, 43 per cent of total affordable housing supply was delivered through inclusionary zoning in England between 2015 and 2016 ([Gurran et al, 2018](#)).

The National Plan should be careful to determine who would benefit the most from inclusionary zoning, and ensure other forms of housing are supplied to those who cannot afford 'affordable' housing price points. For example, inclusionary zoning can generate affordable housing for moderately paid key workers, who may be otherwise unable to afford private rentals in areas close enough to work ([Gilbert et al, 2021](#)). Many of these key workers are women in female-dominated sectors such as childcare, education, aged care and nursing ([Azize, 2023](#)).

Recommendation 12: Adopt a mandatory approach to inclusionary zoning in partnership with the States and Territories.



Reintroduce a rental affordability scheme

A revised rental affordability scheme would further facilitate the development of new social and affordable housing. The National Rental Affordability Scheme (NRAS) commenced in 2008 and was discontinued in 2014, though properties continue to be available until 2026. As at April 2022, 5,793 sole parents were using the scheme, compared with 4,463 couples ([DSS, 2022](#)). Based on the profile of the general sole parent population, it is likely that the majority of sole parents in NRAS housing are women. Anecdotally, older women who are priced out of market-rate private rental housing also benefit significantly from the NRAS.

The properties which remain available under the scheme will cease to receive subsidies in 2026. The scheme cost \$3.1 billion to the Federal Government from inception to 2019. As of September 2022, there were 25,706 active NRAS properties in Australia. By comparison, the Social Housing Initiative delivered 19,500 more quickly, more cost-effectively, and helped those most in need of secure and affordable housing (very low and low income earners, unlike the moderate-income households mostly targeted by NRAS). Some CHPs did, however, combine the NRAS subsidy with other government funding and were consequently able to house lower income residents.

Criticisms of the scheme included the subsidy being too generous, many of the dwellings delivered were designed to maximise return to investors rather than match with demand, the scheme did not significantly increase housing supply (many of the dwellings may have been built anyway), and it did not help those who needed support most ([Coates and Horder-Geraghty, 2019](#)).

However, the scheme did increase overall supply, and a revised scheme which addresses the shortcomings of the original program would be a very valuable component in addressing this element of the housing affordability spectrum.

There is also the potential for a broader, multi-dimensional scheme which seeks to address affordability for all income groups, from those residents on very low social security incomes and Commonwealth Rent Assistance (CRA), all the way through to moderate income households, with the value of the operational subsidies varied to facilitate the housing of a wide spectrum of household incomes.

The reintroduction of such a scheme on a permanent basis would resurrect investor confidence, as the original scheme was discontinued just as NRAS had become well established and understood by private investors, developers, CHPs, and others. Such schemes (and any other funding programs for that matter)



need longevity to have the potential to substantially improve housing affordability in the medium and longer term.

It will, however, remain most likely that addressing homelessness, rough sleeping, and housing women on very low incomes will necessitate capital grant funding at a significant scale, given the very low rental income associated with these resident cohorts. The Social Housing Initiative which commenced in 2008 is a good example of this, and consideration needs to be given by both Federal and State governments to reintroducing investment at this scale.

Public policy on housing matters needs to have a much stronger role than has been seen in Australia in the last several decades. The interventions of the last 30-40 years, which have primarily comprised fiscal incentives that actually work against improving affordability, have not worked, and have in part resulted in the housing crisis that women, in particular, find themselves facing.

Recommendation 13: Introduce a broad, multi-dimensional rental affordability scheme which can facilitate the development of new social and affordable housing across the affordability and household income spectrum.

Support women to stay housed through a genuine Housing First model

In conjunction with increased supply of social and affordable housing, Good Shepherd strongly supports the use of Housing First principles. The Housing First model is a strategic response which prioritises permanent and safe housing for people experiencing homelessness. It has its origins in the United States in the 1990s, and has since been adopted by Canada, numerous European countries and more recently, New Zealand. Once housing is secured for the individual, a multi-faceted team of support workers assist residents with any issues they might be experiencing, including mental health, drug and alcohol treatment, financial hardship, and those escaping family violence.

In most cases, a resident's housing is not contingent upon them engaging with these support services, though approaches do vary from location to location. Rather, the emphasis is generally on the resident's recovery, wellbeing, and an ability to re-engage with their community. Several research projects have concluded that the savings to government of the Housing First approach outweigh the costs of providing the housing and associated support services (AHURI, 2018).



The availability of the Housing First model in Australia has been limited by the lack of supply of social housing dedicated to these purposes, as well as the availability of funding for the associated social support services. Given the relative success of projects around the world, investment at scale in these models is likely to benefit women experiencing homelessness and their children, and maximise the benefits of major government spending on housing projects.

Innovation insights: Comprehensive Aged Support Services program

Good Shepherd has longstanding experience with Housing First principles in its Comprehensive Aged Support Services (CASS) program. The CASS program provides holistic, comprehensive wellbeing and ageing support to Sisters and former residents of Good Shepherd Homes, utilising an evidence-based healthy ageing model. Services are provided to women who live in a mix of housing types including social housing, Good Shepherd owned properties, retirement living and residential care. The service is located in four States (Queensland, WA, Victoria and NSW).

The CASS team are engaged in a broad spectrum of work activity that spans wellbeing education through to dementia and palliative management and care. It includes on the ground practical, emotional, social, and pastoral support, advocacy, and care coordination. It links women with a range of external services which meet specialist needs, enhance in-house services, and maximise efficiency and resources. The CASS program demonstrates the benefits of a responsive and coordinated service system, the use of Housing First principles, and the power of early intervention.

Building on our experience in the CASS program, Good Shepherd will be evolving a Housing First approach in our affordable housing project in Marrickville, Sydney. Older women residents will be able to access allied health and support services, some of which will be co-located with the housing. The co-design process referred to above will inform the number and type of support services that might operate from the site, and those that would more appropriately be provided from elsewhere or accessed remotely by residents.

Recommendation 14: Commit significant capital and operational investment to a national Housing First program to deliver new social housing for this purpose, and associated support services, as part of a broader target to reduce, and ultimately eradicate, homelessness.



Make renting affordable, secure and safe for women and children

The National Plan provides an opportunity for the Federal government to take a leadership role in support of renters, and work with the States and Territories to provide consistent minimum rental standards and protections across Australia, building on commitments made by National Cabinet in 2023.

Many of Good Shepherd's clients live in private rental housing; for example, 30 per cent of No Interest Loan clients are private renters.⁵ Good Shepherd clients have a strong need for affordable, secure and safe rental housing right across the lifespan and due to circumstances such as family violence, including:

- family violence services clients who could be better supported to remain in their current housing if they had stronger rental protections
- family violence services clients who are forced to live in substandard rental housing after leaving the family home or crisis accommodation, due to very low levels of rental supply, weak rental protections, and discrimination against single parents and victim-survivors
- mid-aged and older women who use Good Shepherd's financial services (e.g. financial counselling and the Financial Independence Hub), and have a long-term reliance on private rental housing and are at risk of homelessness without appropriate protections
- young people in Good Shepherd's Youth Homelessness Service, which operates in the west of Melbourne, who cannot find secure, affordable and habitable rental housing, including in situations where they are trying to escape violence in the family home.

Private renting is no longer a transitional tenure to home ownership but a long-term source of housing for almost one third of Australians ([AIHW, 2023](#)). Private rental housing is increasingly 'family housing' – 34 per cent of people aged 35–54 were renters in 2021, compared with 26 per cent of this age group in 1996 ([AIHW, 2023](#)). Over the decade to 2017–18, the percentage of couples with children who rented privately increased from 20 to 24 percent ([AIHW, 2023](#)).

Reflecting women's reliance on private renting, single women (including older women) make up almost 50 per cent of Commonwealth Rent Assistance

⁵ In the financial year 2022–2023, there were 38,384 No Interest Loans issued and of these, 11,397 loans were issued to people living in private rental (29.7%).



recipients, while single men comprise 30 per cent of recipients ([Commonwealth of Australia, 2023](#)).

The needs of women and families should therefore be paramount in developing nationally consistent rental protections.

Rental protections should address interrelated needs, and be developed as a package because they are mutually reinforcing. For example, protections against eviction are needed so renters feel comfortable expecting their rights to minimum housing standards to be upheld. Family violence victim-survivors require not only specific safety-related protections but constraints on rent increases so that it is affordable to stay living in existing homes, allowing women to maintain connections to services, friends and children's schools in their local community. These protections follow the principles of the Safe at Home model discussed earlier, to create a whole of system response to family violence.

Extensive reforms are required to rental regulation to reflect housing's nature as an essential service. Priority reforms from Good Shepherd's perspective are as follows.

A ban on no-cause evictions

Arbitrary evictions without legitimate reason should be unlawful in all States and Territories, following the lead of jurisdictions such as Victoria. No-cause evictions are a major difficulty for women affected by family violence ([Webb et al, 2021](#)) and facilitate discrimination ([Maalsen et al, 2021](#))

Family violence-related protections

A national approach to family violence-related rental protections should build on existing protections (e.g. in Victoria) and include:

- an accessible process for removing a perpetrator from a lease
- relief from obligations for unpaid rent or property damage where the victim-survivor is not responsible, e.g. due to financial abuse
- accessible payment plans/financial hardship measures
- flexibility to terminate leases early if needed for safety reasons, and relief from any lease-break fees
- easy bond return processes (i.e. bond claims without landlord agreement)
- discretion to make safety-related modifications to a rental home and change locks for safety reasons.



Freedom to have pets in rental homes

National reforms should be modelled on Victoria's reforms, where landlords must have good reason to refuse a pet. Good Shepherd practitioners report that it is harder for women to leave abusive relationships if they cannot take pets with them to new rental homes. Pets can be incredibly important to older Good Shepherd clients, and pet-friendly rental housing would open up more housing options for this group.

Restrictions on excessive rent increases

Rents have been rising beyond inflation, with record national growth of 10.2 per cent over 2022 ([CoreLogic, 2023](#)), compared with general inflation of 7.8 per cent. Financial services practitioners at Good Shepherd have noted that this has caused enormous financial stress for their clients, including single parents with young children and older women. The National Plan should investigate appropriate ways of regulating rental pricing, including by limiting rent increases to CPI (similar to the ACT, where landlords can increase rents by no more than 110 per cent of the increase in CPI for rents).

Mandatory structural and energy efficiency standards

Good Shepherd practitioners frequently report that clients are living in private rental housing without basic structural features (e.g. intact flooring and windows), adequate heating and cooling, and insulation. This can lead to unaffordable energy bills and health impacts such as cardiovascular disease, respiratory disease, and poor mental health ([Daniel et al, 2023](#)). Inadequate cooling leaves renters vulnerable to the health impacts of severe heat due to climate change.

There are signs that Good Shepherd clients are starting to take out loans to cover the cost of home repairs and essential services to private rental housing. For example, in 2022-2023, 85 No Interest Loans were issued for 'house repairs' (0.7 per cent of loans to people in private rental housing).

Mandatory standards are the only viable route to large-scale improvement of the energy efficiency/performance of private rental housing, especially in markets with tight supply where landlords have little incentive to improve housing quality. The National Plan should link with the forthcoming National Energy Performance Strategy and set a timeline for compliance with minimum energy efficiency standards in private rental housing across all jurisdictions (see the [detailed framework](#) set out by the Healthy Homes for Renters alliance).

There is no evidence that stronger rental regulation causes landlords to sell properties and exit the private rental market. Instead, property churn is generated



by owners wanting to realise capital gains, needing the money for other purposes, or finding the investment was not as profitable as they hoped ([Martin et al, 2022](#)). Ideally, rental regulations should be designed to attract professional housing providers (including institutional housing providers in the build-to-rent sector) who are well-positioned to offer quality, long-term housing, particularly to women and children who need secure and dignified rental housing right across their lives.

Recommendation 15: Prioritise private rental reform in the National Housing and Homelessness Plan and lead a national program of consistent regulations on eviction and rent increase protections, specialist family violence protections, the freedom to have pets, and structural and energy efficiency standards.

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