

Southern Homelessness Services Network

Submission to the

Productivity
Commission's
Housing and
Homelessness
Agreement Review

2022



The Southern Homelessness Services Network (the SHSN) welcomes this opportunity to make a submission to the Productivity Commission's (PC) Housing and Homelessness Agreement Review. The SHSN commends the Commonwealth Government for requesting this timely review of the National Housing and Homelessness Agreement (NHHA).

About the Southern Homelessness Services Network (SHSN)

The **Vision** of the Southern Homelessness Services Network (SHSN) is an end to homelessness in Southern Region of Melbourne.

The **Mission** of the "Victorian Homelessness Networks is to facilitate, inform and support regional homelessness services and stakeholders to work together to co-ordinate services to people who are experiencing or who are at risk of homelessness."

The Southern Homelessness Services Network (SHSN) comprises all funded Specialist Homelessness Services in the Southern Region of Melbourne including services providing crisis, transitional, long term, family violence and youth support and accommodation. Our members include Launch Housing, the Salvation Army, NEAMI, Wayss and Sacred Heart Mission. The SHSN also supports allied service sectors working in homelessness. The SHSN is a resource for the homelessness sector in the South.

The key strategic SHSN objectives are:

1. To promote and support innovation, knowledge sharing and expertise in the best interests of consumers
2. To foster relationships and collaboration between service providers to ensure timely, coordinated and effective responses
3. To act as a conduit between the Department of Health and Human Services (State Government) and the regional service sector homelessness related data, issues and trends to inform policy
4. Working together to end homelessness

The Southern Region comprises ten local government areas in Southern Melbourne - Bayside, Cardinia, Casey, Frankston, Glen Eira, Greater Dandenong, Kingston, Mornington Peninsula, Port Phillip and Stonnington (see Figure 1). This is a geographically and socio-economically diverse region.

The majority of local Councils in the Southern Region are interested in ending homelessness and four Councils have established (or are in the process of establishing) Functional Zero programs – using a place-based collective impact approach and By-Name Lists to end rough sleeping. This puts the Southern region at the forefront of this movement to end homelessness in Melbourne and the learnings from this approach inform this submission.

Figure 1 Map of Melbourne’s Southern Region Local Government Areas



Five Key Recommendations

The SHSN submission raises five critical issues to be addressed in the Productivity Commission's Review of the NHHA and the development of a new agreement. These are issues of national importance, as well as important in the Southern Region of Melbourne. We have attached our submission to the Federal Parliamentary Inquiry into homelessness from 2020 which provides an overview of the issues and data on homelessness for the Southern region of Melbourne.

The SHSN recommends the following critical issues be addressed in the PC NHHA Review and in the development of a future NHHA -

1. That the Commonwealth Government develop a ten year National Homelessness and Low Income Housing Strategy and Action Plan in conjunction with State, Territory and local governments.

Such as strategy must set strong achievable targets to reduce and end homelessness; provide affordable housing for the lowest income cohorts; and include sufficient funding to support the required actions to end the current housing and homelessness emergency. Traditionally, housing and homelessness policy and programs have been joint Commonwealth/State programs – for example, the Commonwealth-State Housing Agreement and the Supported Accommodation Assistance Program. This strategic national partnership approach to housing and homelessness has guided joint work between the Commonwealth and State/Territory Governments well in the past. However, the current Commonwealth Government has pulled back from this responsibility, pushing this onto State and Territory Governments despite this traditionally being a joint responsibility and despite the need for a national strategy to address the current housing and homelessness emergency.

Despite calls from peak bodies and all major stakeholders for a national strategy and this being a key recommendation of the Parliamentary Inquiry, the Commonwealth Government has recently rejected the opportunity to show leadership and set a national policy agenda on ending homelessness referring to the NHHA as the avenue for this work. The NHHA is a funding mechanism not a strategy outlining policy directions. It is a mechanism for enacting policy but it is currently operating in a national policy vacuum due to the Commonwealth Government ignoring its responsibility for national homelessness and housing policy. A strategic housing and homelessness policy is lacking at the national level. This is a narrow attitude that negates the huge impact that other Commonwealth policies have on either exacerbating homelessness risk or preventing homelessness risk, for example, income support and taxation policies.

Whilst the NHHA is one of the major mechanisms for Governments to implement such a strategy, it does not override the need for such a strategy to guide national policy and collaborative work with all three levels of government and the Specialist Homelessness Sector. It is critical that the next NHHA is guided by a national strategy bringing together all levels of government, business and the community sector work together to end homelessness.

2. Increased affordable, appropriate and safe housing is required for homelessness agencies to achieve sustainable client outcomes

The lack of housing options is the most common and severe block to funded homelessness agencies achieving NHHA outcomes/outputs. There is a lack of affordability; lack of availability; and lack of access to housing for people at risk of and/or experiencing homelessness. Short, medium and long term housing options (preferably social housing) are required to support the sector to efficiently

achieve NHHA outcomes with a focus on increasing sustainable long term housing options as the most effective solution to homelessness. Housing continues to be the most difficult blockage to meeting client needs. It is unreasonable to continue to expect the homelessness sector to end homelessness without an increase in housing options at the lowest income levels. The sector cannot be responsible for ending homelessness unless the supply of safe, appropriate and affordable housing options is increased as homelessness cannot be ended without housing.

Housing First approaches to ending homelessness have demonstrated their effectiveness and cost saving to governments¹. The move towards a greater adoption of the Housing First approach in Australia requires long term housing first, and then the appropriate supports to be available when a client needs them. The Housing First approach has an evidence base to demonstrate its effectiveness, particularly for people with complex needs, but appropriate housing needs to be available for this model to be successful. The SHSN would like to see an expansion of the Housing First approach with the new NHHA designed to provide the key elements of long term safe affordable housing and wraparound supports.

Increasing the supply of housing options affordable to the lowest income cohorts should form a key part of a ten year National Homelessness and Low Income Housing Strategy and Action Plan, establishing a clear national policy framework for ending homelessness in Australia.

3. NHHA funding for homelessness services should reflect the actual demand for assistance including for complex clients with longer term support needs and expand funding to meet demand in outer metro/growth areas

Funding allocations do not reflect the demand for assistance particularly in outer metro growth areas where homelessness and risk of homelessness has substantially increased in recent years and there are more complex support needs of people experiencing chronic homelessness. The changing demographics and geography of homeless populations should be reflected in future program funding.

Funding for support should provide a flexible spectrum of support, rather than a time limited support period that does not equate to the actual needs of people experiencing homelessness. Flexible supports would be better suited to achieving sustainable client outcomes than the current fixed term output focussed support models.

The NHHA should promote Housing First approaches which provide housing and support (at different intensities) for effective program and client outcomes as a strong evidence-based approach to ending homelessness. Currently, agencies trying to implement a Housing First approach struggle to obtain funding for either the housing or the support component of these successful programs as usually Government funding provides either housing or support, not both. As discussed above, the new NHHA should be designed to promote the wider adoption of Housing First approach in Australia.

¹ <https://www.ahuri.edu.au/research/brief/what-housing-first-model-and-how-does-it-help-those-experiencing-homelessness>

“Cost-Effectiveness of Housing First With Assertive Community Treatment: Results From the Canadian At Home/Chez Soi Trial” <https://ps.psychiatryonline.org/doi/10.1176/appi.ps.202000029>

4. Increase effective prevention and early intervention programs under the NHHA

Prevention of homelessness occurring in the first place and early intervention when people are at risk of, or first become homeless, are two key areas that could boost the efficiency of the NHHA. Prevention and early intervention programs reduce the inflow of people into homelessness by diverting them quickly and effectively into sustainable options. The continuing prioritisation of support and housing to those people with the highest needs neglects to address the inflow of new clients into homelessness. New programs focussing on prevention and early intervention include better education about housing (eg tenant skills) and financial literacy; building family and community resilience so that homelessness can be avoided; early linking to support services to prevent homelessness occurring; and improved responsiveness of other sectors to prevent homelessness, including health, mental health, corrections, child protection, etc. These programs need to be available at a broad population level, rather than targeted to people experiencing homelessness and available at scale to reduce the number of people becoming homeless.

One of the most effective policy levers to prevent and end homelessness available to the Commonwealth Government is Centrelink payments. The Coronavirus Supplement during 2020 enabled many income support recipients to lift out of poverty and to avoid homelessness. Unfortunately this was not sustained after the withdrawal of the Supplement. As Davidson found

The legacy of the two pandemic experiences [response in 2020 compared to response in 2021] is likely to be higher inequality and poverty than beforehand, despite remarkable progress in reducing both in 2020².

The current rate for Jobseeker allowance is not sufficient to cover housing costs (even with Commonwealth Rent Assistance), utilities and food, particularly in the private rental market. Jobseeker recipients are constantly forced to make choices that no Australian should have to make for themselves or their children – whether to pay rent or eat? The Coronavirus Supplement allowed them to do both for a while. Boosting the lowest incomes and reducing poverty is a critical tool for preventing homelessness for a large cohort relatively quickly and would provide cost savings to other areas of government including health, mental health and corrections.

5. The Productivity Commission should allow for a more thorough consultation process both with the homelessness sector and people with a lived experience of homelessness to contribute to this critical Review.

The relatively short consultation timelines over summer holidays with an exhausted and sick workforce due to COVID have left many agencies unable to contribute to this Review. The SHSN appreciates the extension from February to March for submissions, however a more thorough consultation process is required for the Productivity Commission to learn from the practice experience of staff and the lived experience of clients/consumers. The SHSN urges the Commission to consult authentically with people with lived experience through running lived experience focus group consultations or interviews. People who have experienced homelessness are not often in a position to make a written submission or even make online comment. The Disability Royal Commission provides a range of examples on how to effectively include marginalised people with lived experience in consultation <https://disability.royalcommission.gov.au/share-your-story> .

² Davidson, P., (2022) A tale of two pandemics: COVID, inequality and poverty in 2020 and 2021 ACOSS/UNSW Sydney Poverty and Inequality Partnership, Build Back Fairer Series, Report No. 3, Sydney <https://povertyandinequality.acoss.org.au/covid-inequality-and-poverty-in-2020-and-2021/>

Conclusion

The critical issues raised by SHSN members in this submission are consistent with the key points made in the recently released in-depth research report by the Australian Alliance to End Homelessness (AAEH), demonstrating that these issues are of national significance not just of relevance in the Southern Region of Melbourne. The AAEH report produced by the Centre for Social Impact provides the following direction which can inform the development of an effective NHA for the future:

Building on the history of homelessness policy and practice over the last 15 years and the evidence base built up from our analysis of the Australian Advance to Zero data, we identify five key actions to end homelessness in Australia:

- 1. Leadership and proactivity at the Australian Government level and a national end homelessness strategy applying across all states and territories.*
- 2. An increase in the supply of social and affordable housing directed to an end homelessness goal.*
- 3. Comprehensive application of Housing First programs linked to wrap-around support for those entering permanent housing with long histories of homelessness and high health and other needs.*
- 4. Targeted prevention and early intervention programs to turn off the tap of entry into homelessness which address the underlying drivers of homelessness including housing access barriers, family and domestic violence, mental health and drug and alcohol needs, poverty and unemployment.*
- 5. Supportive systems and programs which build the enablers of an end homelessness program include: advocacy, commitment, and resource flow to ending homelessness; effective service integration; culturally safe and appropriate service delivery including expansion of Aboriginal and Torres Strait Islander-led and controlled services to help address high rates of homelessness in their communities; and improving data quality, evaluation and research around ending homelessness in Australia (Flatau et al, 2022:4)³.*

We urge the Productivity Commission to make recommendations to the Commonwealth Government based on the critical points made in this submission so that the next NHA can be an effective part of a wider strategy to end homelessness in Australia.

³ Flatau, P., Lester, L., Seivwright, A., Teal, R., Dobrovic, J., Vallesi, S., Hartley, C. and Callis, Z. (2021). *Ending homelessness in Australia: An evidence and policy deep dive*. Perth: Centre for Social Impact, The University of Western Australia and the University of New South Wales. DOI: 10.25916/ntba-f006 Bulletin No 1 “Ending homelessness in Australia: Understanding homelessness; taking action” at <https://aaeh.org.au/publications>