

Everybody's Home People's Commission into the Housing Crisis

April 2024



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Our commitment to inclusion

The Salvation Army Australia acknowledges the Traditional Owners of the land on which we meet and work and pay our respect to Elders, past, present and future.

We value and include people of all cultures, languages, abilities, sexual orientations, gender identities, gender expressions and intersex status. We are committed to providing programs that are fully inclusive. We are committed to the safety and wellbeing of people of all ages, particularly children.

Our values are:

- Integrity
- Compassion
- Respect
- Diversity
- Collaboration

Learn more about our commitment to inclusion: <salvationarmy.org.au/about-us>

The Salvation Army is an international movement and our mission is to preach the gospel of Jesus Christ and to meet human needs in his name without discrimination.

More information about The Salvation Army is at **Appendix A**.









Executive summary

The Salvation Army welcomes the opportunity to provide this submission to the Everybody's Home People's Commission into the Housing Crisis.

In this submission, The Salvation Army focuses on responding to the People's Commission terms of reference and the questions asked in the survey for an organisational response.

This submission covers:

- A description of the experiences of people struggling to access affordable and suitable housing in the context of the community services that The Salvation Army provides.
- What our services witness to be the flow-on impacts of the housing crisis.
- The impact of current policy settings on housing affordability and accessibility.
- The actions that Australian governments can take to improve housing affordability and accessibility most effectively.
- Other observations relevant to the terms of reference of the People's Commission.

The Salvation Army recommends all Australian governments seek to end homelessness by:

- Addressing the structural drivers of homelessness and poverty, including:
 - Fixing the supply of social and affordable housing.
 - Ensuring the adequacy of income support payments and supplements, including the JobSeeker Payment, Youth Allowance and Commonwealth Rent Assistance.
- Focusing on addressing the specific needs of priority cohorts, including:
 - Children and young people.
 - People experiencing family and domestic violence, and gender inequity.
 - Aboriginal and Torres Strait Islander people.

The Salvation Army has made **18** recommendations for Commissioners to consider. A summary of these recommendations follows on the next page.





Summary of Recommendations

Recommendation 1

1.8 The Salvation Army recommends that the Australian Government develop a National Housing and Homelessness Plan that responds to the structural drivers of housing affordability, poverty and homelessness. The Plan should drive efforts that address income adequacy, including increases to income support payments, Commonwealth Rent Assistance and other supplements to ensure all Australians can live with dignity.

Recommendation 2

1.9 The Salvation Army recommends that the Australian Government instruct the Productivity Commission to report on the economic cost of poverty and the likely benefits that would accrue in Australia if disadvantage and financial hardship were addressed.

Recommendation 3

1.10 The Salvation Army recommends that as part of the National Housing and Homelessness Plan, the Australian Government drives a review of Commonwealth Rent Assistance that assesses all aspects of the design of the supplement with the aim of improving its adequacy, fairness, and effectiveness.

Recommendation 4

2.6 The Salvation Army recommends that the Australian Government develop a National Housing and Homelessness Plan that provides the context to deliver deep and comprehensive investment in social housing to arrest the current housing affordability and homelessness trajectory. The delivery of social housing should be commensurate with identified need, including waiting lists, with ambitious state and territory targets identified in the National Plan or its work plans.

Recommendation 5

2.7 The Salvation Army recommends that through the National Housing and Homelessness Plan, the Australian Government work with state and territory governments to respond to the chronic shortfall in exit points that are causing bottlenecks in the homelessness service system. In the shorter term, this should include driving an increase in the stock of transitional housing and emergency accommodation centres.

Recommendation 6

2.8 The Salvation Army recommends that through the National Housing and Homelessness Plan, the Australian Government work with state and territory governments to ensure social housing provision for young people alongside a specialised and targeted support structure that breaks the cycle of homelessness.





- 2.9 The Salvation Army recommends that through the National Housing and Homelessness Plan, the Australian Government drive reform to address the following challenges in growing community housing:
 - Ensure an ongoing funding program for community housing so providers can have 'shovel-ready' projects to apply for available funds.
 - Simplify the application process and extend timelines where the capacity for responding to new funding opportunities may be limited.
 - Review how rental payments are collected through social and affordable housing to make it sustainable for providers to build and maintain housing, while also increasing their stock.
 - Support mandatory inclusionary zoning that will allow the growth of private market housing to contribute to the growth of social and affordable housing.
 - Provide discounted rates to incentivise not-for-profit organisations to invest in housing, where low rental returns, maintenance costs, rates and taxes can be prohibitive.
 - Provide better access to information about the availability of land and whether infrastructure developments are already in place or proposed for the future.
 - Provide adequate funding for community housing providers to develop housing in regional communities where they do not have a current presence and the costs incurred for travel can be prohibitive.

Recommendation 8

- 4.4 The Salvation Army recommends that the Australian Government commit to a dedicated housing and homelessness strategy for children and youth. This acknowledges the unique and multidimensional needs of children and young people that cannot be addressed through an adult-focussed homelessness service system. A strategy would consider:
 - Subsidised housing tenancies and flexible and responsive support for young people to support longer-term tenancies and address evolving needs and circumstances.
 - Appropriate education and training for at-risk young people combined with tailored, coordinated, wrap-around support across housing, youth justice, out-of-home care and mental health support systems.
 - Housing responses that keep families together.
 - A review of income support regulations that presume that a person is dependent on their family until age 25.
 - Service responsiveness to the special vulnerability of children.
 - Better data collection to capture the prevalence and experience of children and young people who are at risk of or experiencing homelessness.

Recommendation 9

4.5 The Salvation Army recommends that in developing the National Housing and Homelessness Plan, the Australian Government provide for accessible social and affordable housing that allows for older women to 'age in place' if they choose.





4.6 The Salvation Army recommends that in developing the National Housing and Homelessness Plan, the Australian Government consider affordable housing solutions specifically aimed at older women.

Recommendation 11

4.7 The Salvation Army recommends that as part of the National Housing and Homelessness Plan, the Australian Government acknowledge and address the shortfall in frontline family violence services. This includes a substantial increase in the number of refuges that can accommodate the safety needs of victim-survivors at serious risk of family violence, especially in rural and remote areas. Funding should also include crisis case management and housing support responses to enable safe transition back to the community.

Recommendation 12

4.8 The Salvation Army recommends that the Australian Government develop the National Housing and Homelessness Plan to work alongside other policy and funding efforts to address the severe disadvantage experienced by Aboriginal and Torres Strait Islander people. This should be developed with the direct engagement, input and advice of Aboriginal and Torres Strait Islander people.

- 4.9 The Salvation Army recommends that in developing the National Housing and Homelessness Plan and other measures affecting Aboriginal and Torres Strait Islander people, the Australian Government consider:
 - The significant overrepresentation of Aboriginal and Torres Strait Islander people experiencing homelessness, overcrowding and housing stress.
 - Acknowledging the differing challenges and needs across metropolitan, regional, remote and very remote communities.
 - Generational trauma and displacement arising from spiritual homelessness, discrimination and ongoing effects as a result of policies that led to the Stolen Generations.
 - Cultural, social, and economic factors, such as kinship responsibilities, extended families, health and wellbeing challenges, and economic disadvantage.
 - The need for both broad and localised cultural awareness that considers language, traditional law and connection to land.
 - Progress towards cultural inclusion and cultural safety at all levels of engagement.
 - The formation, rebuilding and maintenance of relationships that may turn into partnerships.
 - Building the capacity of Aboriginal and Torres Strait Islander people and organisations





- 4.10 The Salvation Army recommends that in developing the National Housing and Homelessness Plan, the Australian Government revisit the following areas outlined in the Issues Paper and Summary Issues Paper:
 - The vision of the National Plan should be to end homelessness in Australia over the life of the National Plan with clear targets to do so.
 - Housing and homelessness responses should be developed with sound understanding of the housing and support needs of different cohorts.
 - The National Plan should lead and drive a new national housing and homelessness agenda, while harnessing jurisdictional efforts.
 - The need for ongoing engagement of people with lived experience of homelessness in the development, implementation, and review of the National Plan.
 - The importance of including aged care, disability housing, out-of-home care, and detention settings when considering the composition of the housing system, due to the significant number of community members who are at risk or become homeless when moving between these systems.
 - The need for housing and population modelling, research on housing trajectories and transparent housing responses to population growth, together with the development of a population strategy.

Recommendation 15

4.11 The Salvation Army recommends that in developing the National Housing and Homelessness Plan, the Australian Government strengthen and direct efforts around person-centred prevention, early and crisis intervention, which have the potential to end homelessness.

Recommendation 16

5.6 The Salvation Army recommends that in developing the National Housing and Homelessness Plan, the Australian Government address the intersection between homelessness, and family and domestic violence.

- 5.7 The Salvation Army recommends that in developing the National Housing and Homelessness Plan, the Australian Government address:
 - The need for adult and child victim-survivors of family violence to remain safely in the home and for available alternative housing options to remove the person using violence from the family home.
 - The accessibility of housing and services, including for victim-survivors in regional and remote areas. These facilities must be well-resourced to ensure the safety of victim survivors, particularly in high-risk cases of family and domestic violence.
 - The bottlenecks in crisis and transitional accommodation for victim-survivors due to the lack of exit points, including into social housing.
 - The insufficient stock of transitional and crisis accommodation, particularly in regions where there are no or limited crisis options.





- 5.19 The Salvation Army recommends that in developing the National Housing and Homelessness Plan, the Australian Government work with state and territory governments to:
 - Focus on prevention, early intervention and community education, including education around financial literacy and financial abuse to empower victim-survivors, particularly those in vulnerable cohorts, to seek help.
 - Develop comprehensive awareness campaigns to ensure key institutions, and the community more broadly, obtain an understanding of coercive control and its impacts on women.
 - Develop education campaigns in relation to active bystander interventions as a community preventative measure.





1 Living in a housing crisis

- 1.1 The Salvation Army provides relief to Australians in need every 17 seconds, with a particular focus on people experiencing the most significant disadvantage. We witness the experiences of people struggling to access affordable and sustainable housing through many of our services.
- 1.2 The rising cost of living is now the leading reason people come to our emergency relief services. Approximately a third of people accessing The Salvation Army's emergency relief services identified it as the reason they need help.
- 1.3 The impacts of inflation are felt by everyone, but they are more acutely felt by those who are already struggling due to low incomes, insecure employment, or the inadequacy of income support payments. The rate of non-discretionary inflation has been masked by more muted discretionary consumption price rises, and hides the reality that it is becoming more and more expensive to be poor in Australia.
- 1.4 These cost of living pressures have short and long-term implications on individuals, who are forced to go without and make up for their income shortfall through debt. This has a particularly long-term effect on children and young people, impacting their health, education and career attainment throughout their lives.
- 1.5 As a major provider of housing and homelessness services, we observe the significant impact that the current cost of living and housing crisis environment has on the people we serve. The impacts are also evident among the community members who access our Doorways emergency relief and case management service, Moneycare financial counselling service and our no interest loans, which we offer both with Good Shepherd through the national No Interest Loans Scheme (NILS) and independently through our Salvos Loans programme.

Housing accessibility

- 1.6 Salvation Army Housing provides homes for individuals or families experiencing or at risk of homelessness, on low incomes or with specific needs. We manage 1,800 properties across the country, supporting over 3,000 people.
- 1.7 In 2023, The Salvation Army spent \$119 million providing housing support and homelessness services. 175,000 people were on The Salvation Army's waiting list for housing in the same year.





What we are seeing

The Salvation Army's 2023 Red Shield Appeal report 'At Breaking Point' illustrates the harsh reality faced by numerous individuals and families, who are forced to make impossible decisions. The findings reveal that many respondents struggle to meet their basic needs due to limited income, resulting in difficulties affording rent, household bills and an adequate supply of food for themselves and their families.

For three in ten respondents, one of their main concerns in the past 12 months was facing or almost facing homelessness. This highlights the tenuous and unstable housing situations encountered by many respondents and the increasing vulnerability they face in maintaining stable housing.

Findings from the report include:

- Respondents spent approximately 41 per cent of their total income on housing. This is significantly higher than the general Australian population, who typically only spend 14 per cent of their income on housing.
- The prevalence of housing stress among respondents was high. Three in four respondents experienced housing stress, spending 30 per cent or more of their household income on housing, and four in ten experienced extreme housing stress, spending 50 per cent or more of their income on housing.
- Respondents on low or limited incomes were particularly vulnerable to housing stress. Those receiving JobSeeker or Parenting payments spent a higher proportion of their household income (44 per cent) on housing and were more likely to experience housing stress and extreme housing stress than those on other Centrelink payments.
- Nearly two in five (39 per cent) respondents with a mortgage were behind on their payments, a higher rate than other respondents in arrears in other housing situations (26 per cent).
- Nearly three in ten (29 per cent) respondents reported that finding or maintaining a safe and affordable place to live was one of their greatest challenges in the past 12 months. The rising cost of housing and intense competition in the rental market has pushed many into financial distress. Some respondents expressed their concerns about being evicted or even becoming homeless due to their inability to afford their housing costs.
- More than one in three (35 per cent) private renters reported finding and maintaining a safe and affordable place to live, as well as almost becoming homeless, were some of their greatest challenges of the past 12 months.





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Emergency relief

- 1.11 The Salvation Army's Doorways service provides emergency relief and holistic case management with referral to internal and external support services. We recognise that people who experience disadvantage and have complex needs require an investment of time, resources and commitment to support them. This has driven a change in the way that The Salvation Army delivers emergency relief support.
- 1.12 Recognising that many people who access emergency relief have experienced intergenerational poverty, The Salvation Army provides extra support through Doorways caseworkers, who provide holistic case management, practical support, and make referrals to other services.





Financial wellbeing

- 1.13 Moneycare is The Salvation Army's financial wellbeing and capability service. It has been operating for over 45 years and has helped thousands of people experiencing, or at risk of experiencing, financial and social exclusion. Moneycare has a national footprint of approximately 85 sites across Australia.
- 1.14 Through Moneycare, we deliver a range of free and confidential services, including financial counselling, financial capability support, and financial literacy and capability workshops.
 Moneycare services support people by addressing their immediate financial crisis situation and helping them build long-term capabilities and resilience in managing financial hardship.
- 1.15 Over the past three years, we have witnessed an increase in employed community members accessing financial counselling (20.7 per cent from November 2021 to October 2022 to 25.6 per cent from November 2022 to October 2023).
- 1.16 Our experience is that some lenders have flourished through the COVID-19 pandemic, with many community members using Buy Now Pay Later (BNPL) loans to purchase necessities, including for groceries and to pay utility bills. This is not sustainable. It also illustrates that people are unaware or unable to access more suitable relief, such as hardship provisions available through their utility provider.

Microfinance

- 1.17 The Salvation Army provides safe and affordable loans to community members on low incomes as part of the national No Interest Loans Scheme (NILS). By assessing an individual's income and helping to set a budget, a NILS loan prevents people on low incomes entering into unsafe and inappropriate loans from other lenders.
- 1.18 The Salvos Domestic Violence Loan Program is a national program that allows victim-survivors of family and domestic violence to borrow up to \$5,000 for essential products and services to support them to find a safe and suitable environment for themselves and their children. The loans are interest and fee-free and can be repaid up to three years to ensure affordability. The program also incorporates financial education and our Positive Lifestyle Program to provide additional support and skills development to community members for ongoing financial confidence and security. As of 1 March 2024, Salvos Loans has assisted 204 people this year, extending 116 loans in total.
- 1.19 Salvos Loans, along with other no interest loans, divert individuals away from other forms of credit which are higher risk, such as BNPL and short-term credit contracts (commonly known as payday loans).





2 The flow-on effect of the housing crisis

- 2.1 Staff and clients consistently tell us that the depth, breadth, and ongoing escalation of unaffordable housing is impacting negatively on the lives and welfare of an increasing number of Australians and resulting in homelessness.
- 2.2 The links between income inadequacy, poverty, housing affordability and homelessness are well-established. These issues are so entwined that the experience of one form of disadvantage can lead a person to also experience the others.

Social housing

- 2.3 Access to public and community housing remains a critical issue in Australia. Each year, waiting lists for public and social housing continue to increase, with demand surpassing the capacity to provide low-cost accommodation. This is particularly the case for young people, where only a very small proportion of those on waiting lists achieve a social housing outcome.
- 2.4 In Australia as of June 2022, there were 174,600 households on a waiting list for public housing and 13,700 households on the waiting list for state-owned and managed Indigenous housing. A 2018 study estimated a national shortfall of social and affordable housing of over 430,000 dwellings. It also estimated that by 2036 there will be a shortfall of nearly 730,000 dwellings.
- 2.5 Homelessness services can only function as designed when they are able to transition people out of crisis and supported accommodation into safe exit accommodation, whether that be social or affordable housing, or the private housing market. Without adequate exit points and transition supports, systems experience a backlog as they are unable to find adequate accommodation for community members out of immediate crisis. This has knock-on effects for all other homelessness services and precludes these resources from assisting others experiencing homelessness.

² Lawson, J., Pawson, H., Troy, L., van den Nouwelant, R. and Hamilton, C. (2018) Social housing as infrastructure: an investment pathway, AHURI Final Report 306, Australian Housing and Urban Research Institute Limited, Melbourne.

³ Ibid.



¹ Australian Institute of Health and Welfare. (2023). *Housing assistance in Australia*. Retrieved from https://www.aihw.gov.au/reports/housing-assistance/housing-assistance-in-australia



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 - Provide discounted rates to incentivise not-for-profit organisations to invest in housing, where low rental returns, maintenance costs, rates and taxes can be prohibitive.
 - Provide better access to information about the availability of land and whether infrastructure developments are already in place or proposed for the future.
 - Provide adequate funding for community housing providers to develop housing in regional communities where they do not have a current presence and the costs incurred for travel can be prohibitive.





3 The impact of current policy settings

3.1 The system as a whole fails to act as a safety net for people experiencing economic hardship, relying on the charity sector to fill the gap. The rental, investment, owner occupier, and social housing markets are not isolated – they exist on a continuum and are interrelated. Changes in the affordability and availability at any point along this continuum impact the system as a whole.

Income support payments and supplements

- 3.2 Our experience is that inadequate levels of income support payments and supplements contribute to housing affordability issues and homelessness. In the 2022-23 financial year, 88 per cent of people seeking The Salvation Army Doorways emergency relief services were reliant on government payments
- 3.3 In response The Salvation Army has long called for a permanent increase to the JobSeeker Payment and Youth Allowance. Our experience is that despite recent increases, current income support levels do not resolve the depths of disadvantage in our country and fail to support a person to meet housing expenses and avoid poverty in general.
- 3.4 This is particularly true of Youth Allowance, which is not able to meet young people's needs. The number of young people in housing stress has significantly risen over the last few years. Research showed that in 2019-20 419,000 young people aged between 15 and 24 years were living in poverty.⁴ The rate of youth poverty is higher than average, with young people representing 12.6 per cent of the overall population experiencing poverty.⁵
- 3.5 Our experience delivering support services has shown that people on income support prioritise accommodation costs, and that following the cost of housing, many live on approximately \$30 per day. Current inflationary pressures on other essentials have further stretched household budgets and continue to place pressure on those already experiencing disadvantage due to the inadequacy of their income. After paying for additional essential household expenses, including groceries, medical expenses, utilities and various other bills, this figure dropped to a mere \$8 per week or slightly over \$1 per day to save or spend on non-essentials.

⁶ Verrelli, S., Russell, C., Taylor, E., & Xu, H. (2023). Doorways Emergency Relief Survey for the 2023 Red Shield Appeal. The Salvation Army, Australia.



⁷ Ibid.

⁴ Davidson, P., Bradbury, B., & Wong, M. (2023). *Poverty in Australia 2023: Who is affected.* Poverty and Inequality Partnership Report no. 20. Australian Council of Social Service and UNSW Sydney



- 3.6 Work has been done in other nations to quantify the cost (and opportunity cost) of poverty in terms of impact on available labour, crime and health costs and the results are arresting. In the United Kingdom the cost of poverty has been estimated to be around GBP£78 billion per year.⁸ In the United States, it has been estimated that child poverty costs as much as USD\$1 trillion each year.⁹ It is estimated that the return on investment for policies that address poverty is around USD\$7 for each USD\$1 spent.¹⁰ The New Zealand Productivity Commission (NZPC) has assessed the benefits of reducing persistent disadvantage. A study they cite suggests that the cost of child poverty in 2011 might have represented as much as 9.1 per cent of New Zealand's GDP.¹¹
- 3.7 The issue of income and income support adequacy, which ensures a minimum acceptable standard of living, is intrinsically linked to housing affordability and homelessness, and falls within the responsibility of the Australian Government in setting payments and their interaction with supplements such as Commonwealth Rent Assistance.

Commonwealth Rent Assistance

- 3.8 The Commonwealth Rent Assistance (CRA) supplement is available to renters in the private rental market and community housing who are receiving an income support payment. It aims to prevent more widespread housing stress and housing affordability issues.
- 3.9 The Productivity Commission found that 44 per cent of low-income households receiving CRA at the end of June 2022 still experienced rental stress.¹² It is estimated that almost two thirds of people under the age of 24 receiving CRA still experience rental stress.¹³ Although CRA increased by 15 per cent in September 2023, the current rate is still insufficient to remediate ongoing rental increases and rising household costs.

Housing and homelessness policies and programs

3.10 Our experience is that the social and affordable housing deficit has led to a chronic shortage of exit points from both transitional housing options and crisis beds across the country. As a result of the low vacancy rates in the social housing system, the number of clients able to transition from these temporary accommodation options into long-term accommodation (public and community housing) has stagnated. This housing bottleneck has been highlighted by our services as one of the most urgent issues that needs to be addressed.

¹¹ Timmins, J. (2022). *The benefits of reducing persistent disadvantage*. The New Zealand Productivity Commission. 3. https://www.productivity.govt.nz/assets/Documents/Reducing-persistent-disadvantage-research-note-Sep-2022-FINAL-1.pdf.

12 Australian Institute of Health and Welfare. (2023). *Housing assistance in Australia*. https://www.aihw.gov.au/getmedia/74505dd1-4494-47f8-ab85-631de25473cd/housing-assistance-in-australia.pdf?v=20220615095640&inline=true



⁸ Bramley, G. Hirsch, D. Littlewood, M. Watkins, D. (2016). Counting the cost of UK Poverty. Joseph Rowntree Foundation. 62. https://jrf-irbt-

brand.frontify.com/api/asset/eyJjbGllbnRJZCl6ImNsaWVudC1tenFieWtsc2Z0ZHpoN3V3liwiaWQiOjYyMDcsInRpbWVzdGFtcCl6MTcwMDgxOTA4MSwidmVyc2lvbil6MTcwMDlzNTg1Mn0:joseph-rowntree-foundation:zbLnf5GXYY4Fxd6tKdwRMrPKbs4Xdtql8SO_D8qs3-8/download

⁹ McLaughlin, M. Rank, M. (2018). Estimating the Economic Cost of Childhood Poverty in the United States. *Social Work Research*, 42(2), 73-83. https://academic.oup.com/swr/article-abstract/42/2/73/4956930?redirectedFrom=fulltext&login=true.



- 3.11 For example, the town of Karratha in WA has a waiting list for housing of approximately five years. The Salvation Army's local family and domestic violence service, which is intended as a short-term crisis service for stays of six to eight weeks has women staying for six to twelve months in hotel-sized rooms, often with children. Most critically, due to the lack of affordable exit options, many women are left to return to live with the perpetrator as their only option.
- 3.12 Our outreach services are also reporting significant bottlenecks in their services. In one of our family accommodation programs families are meant to remain in the program for up to two years, however the current lack of exit pathways means that families are now staying for three to four years.
- 3.13 For young people in crisis accommodation, a lack of exit options is resulting in stays of eight to ten months in services that are designed for much shorter periods. A lack of specialist crisis options also sees young people entering adult homelessness systems that are not designed to meet their support needs. This can present other risks due to their age.
- 3.14 These scenarios in homelessness outreach, transitional and crisis services are playing out right across the country.
- 3.15 Extended stays prevent existing clients from moving into stable long-term accommodation. They also mean restrict new clients from accessing crisis services. This places increased pressure on service providers.
- 3.16 Both The Salvation Army's homelessness and family and domestic violence streams have also reported significantly high turn-away rates due to our services being at capacity. Our family and domestic violence service in Karratha has reported having to turn away individuals on 600 occasions over a 12-month period, while the family accommodation program turns away five to ten families a week and has closed the waiting list as they do not want to give families a false hope.
- 3.17 It will take many years and rolling budget commitments before there is adequate flow within the social housing system. In the shorter term, an increase in the stock of transitional housing and emergency accommodation centres is also necessary, particularly in regions where there are no or limited crisis options. This will ensure more people can be supported until they can exit into long-term and stable housing.





4 Improving affordability and access

- 4.1 The Salvation Army believes that the current policy system is not sufficient to respond to the structural drivers of housing affordability, poverty and homelessness. There is a need to address the wider structural and systemic issues highlighted above.
- 4.2 We have identified three priority areas for reform through which the National Housing and Homelessness Plan can meet immediate needs, address the structural drivers of homelessness and poverty, and lay the foundations for better outcomes:
 - Addressing the inadequate supply of social and affordable housing.
 - Ensuring the adequacy of income support payments and supplements, including the JobSeeker Payment, Youth Allowance and Commonwealth Rent Assistance.
 - Focusing on addressing the specific needs of priority cohorts, including:
 - Children and young people
 - People experiencing family and domestic violence, and gender inequity
 - Aboriginal and Torres Strait Islander people.
- 4.3 The following recommendations address these areas in greater detail. They are also contained in The Salvation Army's submission to the Department of Social Services on the National Housing and Homelessness Action Plan.

- 4.4 The Salvation Army recommends that the Australian Government commit to a dedicated housing and homelessness strategy for children and youth. This acknowledges the unique and multidimensional needs of children and young people that cannot be addressed through an adult-focussed homelessness service system. A strategy would consider:
 - Subsidised housing tenancies and flexible and responsive support for young people to support longer-term tenancies and address evolving needs and circumstances.
 - Appropriate education and training for at-risk young people combined with tailored, coordinated, wrap-around support across housing, youth justice, out-of-home care and mental health support systems.
 - Housing responses that keep families together.
 - A review of income support regulations that presume that a person is dependent on their family until age 25.
 - Service responsiveness to the special vulnerability of children.
 - Better data collection to capture the prevalence and experience of children and young people who are at risk of or experiencing homelessness.





4.5 The Salvation Army recommends that in developing the National Housing and Homelessness Plan, the Australian Government provide for accessible social and affordable housing that allows for older women to 'age in place' if they choose.

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Recommendation 12

4.8 The Salvation Army recommends that the Australian Government develop the National Housing and Homelessness Plan to work alongside other policy and funding efforts to address the severe disadvantage experienced by Aboriginal and Torres Strait Islander people. This should be developed with the direct engagement, input and advice of Aboriginal and Torres Strait Islander people.





- 4.9 The Salvation Army recommends that in developing the National Housing and Homelessness Plan and other measures affecting Aboriginal and Torres Strait Islander people, the Australian Government consider:
 - The significant overrepresentation of Aboriginal and Torres Strait Islander people experiencing homelessness, overcrowding and housing stress.
 - Acknowledging the differing challenges and needs across metropolitan, regional, remote and very remote communities.
 - Generational trauma and displacement arising from spiritual homelessness, discrimination and ongoing effects as a result of policies that led to the Stolen Generations.
 - Cultural, social, and economic factors, such as kinship responsibilities, extended families, health and wellbeing challenges, and economic disadvantage.
 - The need for both broad and localised cultural awareness that considers language, traditional lore and connection to land.
 - Progress towards cultural inclusion and cultural safety at all levels of engagement.
 - The formation, rebuilding and maintenance of relationships that may turn into partnerships.
 - Building the capacity of Aboriginal and Torres Strait Islander people and organisations





- 4.10 The Salvation Army recommends that in developing the National Housing and Homelessness Plan, the Australian Government revisit the following areas outlined in the Issues Paper and Summary Issues Paper:
 - The vision of the National Plan should be to end homelessness in Australia over the life of the National Plan with clear targets to do so.
 - Housing and homelessness responses should be developed with sound understanding of the housing and support needs of different cohorts.
 - The National Plan should lead and drive a new national housing and homelessness agenda, while harnessing jurisdictional efforts.
 - The need for ongoing engagement of people with lived experience of homelessness in the development, implementation, and review of the National Plan.
 - The importance of including aged care, disability housing, out-of-home care, and detention settings when considering the composition of the housing system, due to the significant number of community members who are at risk or become homeless when moving between these systems.
 - The need for housing and population modelling, research on housing trajectories and transparent housing responses to population growth, together with the development of a population strategy.

Recommendation 15

4.11 The Salvation Army recommends that in developing the National Housing and Homelessness Plan, the Australian Government strengthen and direct efforts around person-centred prevention, early and crisis intervention, which have the potential to end homelessness.





5 Other relevant observations

The intersection between homelessness and family and domestic violence

- 5.1 The Salvation Army is concerned that the Summary Report of the consultation for the National Housing and Homelessness Plan, released in January 2024, does not specifically identify family and domestic violence as a lever to be addressed with targeted solutions.
- 5.2 Evidence shows women continue to be overwhelmingly more likely to experience family, domestic and sexual violence than men in Australia.¹⁴
- 5.3 Some groups experience greater risks of family and domestic violence due to social barriers and intersecting forms of oppression, discrimination and marginalisation. These groups include Aboriginal and Torres Strait Islander women, women from culturally and linguistically diverse (CALD) backgrounds, young women, pregnant women, women separating from their partners, women with disability and mental ill health, older women, people from the LGBTQIA+ community, women on temporary visas and who may be victims of modern slavery, human trafficking or labour exploitation, and women experiencing financial hardship.¹⁵
- 5.4 Our experience across Australia is that insufficient safe accommodation for women and children, and social housing waiting lists in metropolitan, regional and rural areas are at an all-time high. Most concerningly, the absence of affordable housing exits means that many victim-survivors of family and domestic violence feel they have no option but to return to the residence of the perpetrator.
- 5.5 High-risk cases of family and domestic violence require substantial infrastructure and support in the form of extensive security, duress alarms, case work and ongoing outreach. We cannot be in a position where high-risk cases of family and domestic violence are denied support because the service does not have the facilities to keep them safe. Increased infrastructure to support victim-survivors is needed to achieve acceptable outcomes as demand will inevitably increase with increased awareness.

Australian Institute of Health and Welfare. (2019). Family, domestic and sexual violence in Australia: continuing the national story. https://www.aihw.gov.au/getmedia/b0037b2d-a651-4abf-9f7b-00a85e3de528/aihw-fdv-3.pdf?v=20230605172452&inline=true McKenna, Kate (2019, April 16). Brisbane Couple Jailed for Keeping Fijian Woman as Servant. *ABC News*. https://www.abc.net.au/news/2019-04-16/couple-sentenced-over-forcing-fijian-woman-to-be-servant/11019432. Australian Institute of Health and Welfare. (2018). *Family, domestic and sexual violence in Australia*. https://www.aihw.gov.au/getmedia/d1a8d479-a39a-48c1-bbe2-4b27c7a321e0/aihw-fdv-02.pdf.aspx?inline=true.



¹⁴ Australian Institute of Health and Welfare. (n.d.). FDSV summary – Family, domestic and sexual violence. *Australian Institute of Health and Welfare*. https://www.aihw.gov.au/family-domestic-and-sexual-violence/resources/fdsv-summary

¹⁵ Safe and Equal. (n.d.). Who experiences family violence. Safe and Equal. https://safeandequal.org.au/understanding-family-violence/who-experiences-family-violence/



5.6 The Salvation Army recommends that in developing the National Housing and Homelessness Plan, the Australian Government address the intersection between homelessness, and family and domestic violence.

Recommendation 17

- 5.7 The Salvation Army recommends that in developing the National Housing and Homelessness Plan, the Australian Government address:
 - The need for adult and child victim-survivors of family violence to remain safely in the home and for available alternative housing options to remove the person using violence from the family home.
 - The accessibility of housing and services, including for victim-survivors in regional and remote areas. These facilities must be well-resourced to ensure the safety of victim survivors, particularly in high-risk cases of family and domestic violence.
 - The bottlenecks in crisis and transitional accommodation for victim-survivors due to the lack of exit points, including into social housing.
 - The insufficient stock of transitional and crisis accommodation, particularly in regions where there are no or limited crisis options.

Financial security as a protective factor

- 5.8 For women experiencing family and domestic violence, financial stress and economic insecurity reverberate through their lives both while in the relationship and after separation. The costs of separation from a violent relationship are higher than those incurred in the separation from a non-violent one. 17
- 5.9 Over 50 per cent of people entering The Salvation Army family and domestic violence services are unemployed or looking for work. Insecure and inadequate work raises the risks for themselves and their children. Limited work opportunities mean that women tend to stay in a violent relationship longer or, having left and struggled to make ends meet, return to the perpetrator.

Australian Institute of Health and Welfare. (2024). Economic and financial impacts – Family, domestic and sexual violence. *Australian Institute of Health and Welfare*. https://www.aihw.gov.au/family-domestic-and-sexual-violence/responses-and-outcomes/economic-financial-impacts#findings



Summers, A. (2022). The Choice: Violence or Poverty. University of Technology Sydney. https://doi.org/10.26195/3s1r-4977
 Women's Safety NSW. (2021, March 5). RE: Social Services Legislation Amendment (Strengthening Income Support)
 Bill 2021 Senate Inquiry [Submission].



5.10 Adequate income and secure employment give women choice. They enable victim-survivors to leave violent relationships in the first place. They empower them to retain custody of their children and to independently house, feed, clothe and educate themselves and their children. They enable them to keep their children safe. Without secure work, housing becomes unstable, which increases the trauma women and their children are already trying to manage.

Prevention, early intervention and community education

- 5.13 Prevention, early intervention and community education remain the most effective ways to address the underlying problems that influences patterns of gender inequity and family and domestic violence that impact on women's safety.
- 5.14 Our frontline experience is that many victim-survivors may not realise they are experiencing family and domestic violence and may only come to this realisation for the first time after speaking to our specialist family violence practitioners, Moneycare financial counsellors and Doorways case workers, or when presenting at one of our Doorways emergency relief centres.
- 5.15 As a community, we need to continue to empower all victim-survivors to identify all forms of abuse and to address discrimination, disadvantage and entrenched gender bias and exploitation in the home, in relationships and in the workplace. Our faith communities are also places where people can identify family and domestic violence occurring.
- 5.16 We wholeheartedly support the Our Watch 'Change the Story' policy approach to prevention and education. 18 We also advocate for better awareness raising to ensure that every individual in Australia considers themselves active bystanders, and for greater support for community-based violence prevention.
- 5.17 We must continue to educate the community to recognise and call out disrespectful, coercive and controlling behaviours as unacceptable. Importantly, the National Community Attitudes towards Violence against Women Survey (NCAS) highlights that 'violence-supportive attitudes' such as excusing perpetrators, minimising violence against women and mistrusting women's reports of violence can influence social norms and expectations.¹⁹
- 5.18 We must have better resourced and more effective systems and services for preventing and responding to family and domestic violence. This includes resources and systems that support holistic recovery responses, including independent housing options.

¹⁹ Australia's National Research Organisation for Women's Safety. (2018). Are We There Yet? Australians' attitudes towards violence against women & gender equity (Summary findings from the 2017 National Community Attitudes towards Violence against Women Survey). https://20ian81kynqg38bl3l3eh8bf-wpengine.netdna-ssl.com/wp-content/uploads/2019/12/300419_NCAS_Summary_Report.pdf



¹⁸ Our Watch. (2015). Change the Story: A shared prevention for the primary prevention of violence against women and their children in Australia. https://d2bb010tdzqaq7.cloudfront.net/wp-content/uploads/sites/2/2019/05/21025429/Change-the-storyframeworkpreventviolence-women-children-AA-new.pdf.



- Increased funding must be coupled with strategies and initiatives that address harmful attitudes supporting rigid gendered stereotyping and dismantle systems that enable these attitudes to exist.
- Effective systems protect women and their children from further violence and hold perpetrators accountable.
- Effective systems send the message that victim-survivors and Australia by extension –
 do not have to tolerate violence; they can and will be supported to leave.

- 5.19 The Salvation Army recommends that in developing the National Housing and Homelessness Plan, the Australian Government work with state and territory governments to:
 - Focus on prevention, early intervention and community education, including education around financial literacy and financial abuse to empower victim-survivors, particularly those in vulnerable cohorts, to seek help.
 - Develop comprehensive awareness campaigns to ensure key institutions, and the community more broadly, obtain an understanding of coercive control and its impacts on women.
 - Develop education campaigns in relation to active bystander interventions as a community preventative measure.





6 Conclusion

- 6.1 The Salvation Army thanks the Everybody's Home People's Commission into the Housing Crisis for the opportunity to provide a written submission.
- 6.2 The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance. Further information can be sought from government.relations@salvationarmy.org.au.

The Salvation Army Australia Territory
26 April 2024





Appendix A About The Salvation Army

The Salvation Army is an international Christian movement with a presence in more than 130 countries. Operating in Australia since 1880, The Salvation Army is one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion.

The Salvation Army Australia provides more than 1,000 social programs and activities through networks of social support services, community centres and churches across the country. Programs include:

- Financial counselling, financial literacy and microfinance
- Emergency relief and related services
- Homelessness services
- Youth services
- Family and domestic violence services
- Alcohol, drugs and other addictions
- Chaplaincy
- Emergency and disaster response
- Aged care
- Employment services

As a mission-driven organisation, The Salvation Army seeks to reduce social disadvantage and create a fair and harmonious society through holistic and person-centred approaches that reflect our mission to share the love of Jesus by:

- Caring for people
- Creating faith pathways
- Building healthy communities
- Working for justice

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

Further information about The Salvation Army can be accessed at: https://www.salvationarmy.org.au/

