

Response to the Productivity Commission's 'Housing and Homelessness Agreement Review'

Neami National (Neami) was established in 1986 and is a specialist community mental health provider supporting people to improve their wellbeing, live independently and pursue a life based on their strengths, values and goals. We support over 27,000 individuals nationally across services spanning community and residential mental health, suicide prevention, and housing and homelessness. We provide street outreach and work in collaboration with the community, social and public housing providers and transitional services to deliver a range of wraparound housing programs that build the capacity, resilience and connection between communities and community members to improve mental health outcomes, secure and maintain sustainable housing, and support individuals to live as full members of their communities.

Neami welcomes the Productivity Commission's review of the National Housing and Homelessness Agreement (NHHA) and we offer the following recommendations which we believe are integral to exceeding the NHHA's goal of *improving Australians' access to secure and affordable housing across the housing spectrum,* paving the way to ending homelessness and housing insecurity. Neami recommends:

- Development of a national housing and homelessness strategy. Operating alongside and integrated with the NHHA, a comprehensive, federal government-led strategy will provide a roadmap for all stakeholders, out of homelessness and housing insecurity.
- Investment in national housing and homelessness monitoring and data analysis to drive informed
 housing policies and assist service providers to deliver services that target the drivers of
 homelessness and develop a comprehensive understanding of the programs and services being
 delivered in their communities and beyond.
- Investment in a range of accommodation types to ensure adequate support and housing for all Australians at each point of the homelessness continuum.
- Recognition that mental health is relevant to each of the priority groups identified in the NHHA and should be acknowledged through investment in wraparound housing support programs to assist people to secure, retain and/or sustain their accommodation.

In preparing this submission, Neami has drawn on our experience delivering a range of housing and homelessness services in partnership with the housing and community sector and our work in collaboration with industry experts such as the Centre for Social Impact, to evaluate services and understand what works in addressing homelessness and housing insecurity.

A National Housing and Homelessness Strategy

Neami strongly supports the recommendation of the Standing Committee on Social Policy and Legal Affairs¹ for a national strategy on homelessness. Their recommendation includes housing policy reform that will see the federal government take on a greater coordination role, supporting states and territories to work towards a national strategy to address homelessness and housing insecurity. This echoes the Centre for Social Impact's (CSI) call for a national homelessness strategy with clear

¹ Parliament of Australia. (2021). Parliamentary strategy calls for a new national strategy on homelessness. 4th August 2021. https://www.aph.gov.au/About_Parliament/House_of_Representatives/About_the_House_News/Media_Releases/Parliamentary_committe e_calls_for_a_new_national_strategy_on_homelessness#:~:text=A%20national%20strategy%20would%20lead,in%20social%20and%20affor dable%20housing.



targets, investment in comprehensive (including real-time) data monitoring, underpinned by a robust NHHA that delivers a nation-wide roadmap to end homelessness with the flexibility to enable states and territories to address local needs in innovative ways.

We recommend that a national strategy on housing and homelessness endorse a Housing First approach that will see all people in safe and secure housing. The strategy must consider homelessness prevention and early intervention to support people at-risk of homelessness to sustain their tenancies and commit to rapid housing and support for people who are homeless or at risk of becoming homeless. Neami welcomes a strategy that articulates clear targets for increasing the number and range of housing types which is backed by adequate, ongoing funding. The strategy must ensure it listens to the voice of service users with a lived experience of homelessness, acknowledging their preference for choice and control over where they live and putting privacy, safety and security central to housing development.²

Neami recommends that in the development of the proposed strategy, the federal government take notice of the innovations in housing and homelessness responses that have been developed as a result of conditions created by the pandemic. As a result of the pandemic, increased commitment from states and territories to address the significant numbers of people who are homeless, including those who have a history of complex needs and chronic homelessness, has led to significant numbers of people transitioning to safe and secure housing. This positive trend is likely to reverse if the funding provided during the pandemic, reverts to pre-covid levels. These examples, explored in the following section, demonstrate that it is possible to house the current homeless population but it requires national coordination, multi-level commitment and funding from the federal, state and territory governments to ensure innovative and successful housing solutions do not fall by the wayside. A national housing and homelessness strategy will draw together the above stakeholders towards a unified vision to end homelessness backed by a robust NHHA and adequate funding that is targeted where it is most needed.

Investment in national housing monitoring and data analysis to drive informed housing and homelessness policies and to assist service providers to work collaboratively

The recently released *Ending Homelessness in Australia: An Evidence and Policy Deep Dive* report³ published by the Centre for Social Impact (CSI) recommends that to end homelessness we need an 'enabling environment' characterised by adequate funding, a joined-up support sector underpinned by a rigorous evidence base around what works to end homelessness, and guided by a compelling government and state and territory endorsed roadmap.

To end homelessness, the sector requires a genuine understanding of homelessness, not simply how it occurs, but how people move within the system, their experience at each point on the continuum, and the unique drivers of homelessness within diverse contexts. Armed with a practical and contextual understanding of the problem, we can adequately map the current policy and practice environment and consider how this aligns with people's housing goals and experiences at each point of the system.⁴

Through Neami's practice, alongside community partners, to deliver key programs such as the Adelaide Street to Home Service, the Adelaide Zero Project and the South Australian COVID-19

⁴ Flatau, P., Lester, L., Seivwright, A., Teal, R., Dobrovic, J., Vallesi, S., Hartley, C. & Callis, Z. (2021). Ending homelessness in Australia: An evidence and policy deep dive. Bulletin No 1 Ending homelessness in Australia: Understanding homelessness; taking action. Perth: Centre for Social Impact, The University of Western Australia and the University of New South Wales. https://doi.org/10.25916/ntba-f006.



 $^{^2}$ Fossey, E., Harvey, C. & McDermott, F. (2020). Housing and Support Narratives of People Experiencing Mental Health Issues: Making My Place, My Home. Front. Psychiatry 10:939. doi: 10.3389/fpsyt.2019.00939

³ Flatau, P., Lester, L., Seivwright, A., Teal, R., Dobrovic, J., Vallesi, S., Hartley, C. & 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

Emergency Accommodation for Rough Sleepers (CEARS) program, we understand that some cohorts who are homeless experience a greater degree of housing instability and disconnect, but due to the interplay between risk factors together with a lack of appropriate housing options;

- fall between the gaps as they transition between settings
- are turned away from services due to a range of factors including stigma and complex presentation or needs
- are unable to access the housing and wraparound support that meets their unique living requirements (e.g. single males, women with accompanying minors, people with justice conditions, people with disabilities).
- fall out of housing and into homelessness because brief prevention services, including emergency brokerage, are not available

Investment in early intervention initiatives for those at risk of homelessness and/or circuit-breaker options to support at-risk persons to remain housed (e.g. brokerage, options for light touch housing, mental health and other relevant support) can reduce the likelihood of return to homelessness for many as well as being a cost-effective method of addressing homelessness.

The CEARS response delivered by Neami, Hutt Street Centre and Baptist Care during the COVID-19 pandemic addressed an urgent need for at-risk rough sleepers in South Australia, providing temporary motel accommodation which operated as an entrance point from rough sleeping to longer-term housing. Through a coalition between homelessness organisations and the government, CEARS delivered significant housing outcomes with almost half of rough sleepers transitioning to long-term accommodation. Echoing the recommendations of the Centre for Social Impact, we believe that to end homelessness we must gain an understanding of why and how people are falling into homelessness and work in collaboration with stakeholders in the system to close the gap.

The *Ending homelessness* report highlights how a shared goal to end homelessness underpinned by pooled resources and real-time data can lead to the reorientation of collaboration between providers and funders increasing the number of people in sustainable housing. The Report consolidates the homelessness data of more than 20,000 people over a ten-year-period through the application of the Advance to Zero database and use of the By-Name List data, providing a deeper understanding of how people move between housing and homelessness, as well as illuminating the health and social needs of people who are accessing homelessness services. The Vulnerability Index (VI) or the VI-Service Prioritisation Decision Assistance Tool (VI-SPDAT) provides a method of prioritising consumers to best determine how often-scarce housing resources can be distributed. The Centre for Social Impact acknowledge there is more work to be done to improve the cultural appropriateness of the tool but in the meantime, it provides a layer of understanding of homelessness that was not previously available.

Neami would like to see government investment in improving and expanding the collection and monitoring of homeless sector data to prioritise vulnerable people with improved acuity and enable system-wide continuous improvement beyond individual organisations or programs. Neami support CSI's call for widespread government adoption of the Advance to Zero campaign and urge federal and states/territories to consider options for how the NHHA nationally consistent housing and

⁵ Flatau, P., Lester, L., Seivwright, A., Teal, R., Dobrovic, J., Vallesi, S., Hartley, C. & Callis, Z. (2021). Ending homelessness in Australia: An evidence and policy deep dive. Bulletin No 1 Ending homelessness in Australia: Understanding homelessness; taking action. Perth: Centre for Social Impact, The University of Western Australia and the University of New South Wales, p. 179. https://doi.org/10.25916/ntba-f006.
⁶ Flatau, P., Lester, L., Seivwright, A., Teal, R., Dobrovic, J., Vallesi, S., Hartley, C. & Callis, Z. (2021). Ending homelessness in Australia: An evidence and policy deep dive. Bulletin No 1 Ending homelessness in Australia: Understanding homelessness; taking action. Perth: Centre for Social Impact, The University of Western Australia and the University of New South Wales. https://doi.org/10.25916/ntba-f006.



homelessness data set can work alongside the proposed person-centred, data-driven approach outlined in the Ending Homelessness in Australia report.⁷

Investment in a range of accommodation and support types to ensure adequate support and housing at each point of the homelessness continuum

In addition to the housing programs articulated above, Neami delivers a wide range of housing and homelessness services that deliver flexible support to people along the homelessness continuum. Our services include:

- outreach and case management delivered by staff with mental health expertise
- accommodation with wraparound support for people with rental debts and poor housing histories
- support to maintain a tenancy for people with chronic physical and mental health concerns to prevent homelessness
- accommodation support for people exiting custody or hospital environments
- specialist housing for First Nations persons/families delivered by Aboriginal-identified housing workers within a social and emotional wellbeing framework.

Whilst a lack of appropriate housing stock has been a perennial problem for people using our services, the advent of COVID-19 as well as the impact of flooding and bushfires across large regions of Australia, has exacerbated many concerning elements of the housing sector including contributing to growing rates of poverty as a result of loss of employment and rent increases, increasing rates of mental illness, and growing numbers of vulnerable people falling into homelessness. As is widely reported, and certainly witnessed by our housing teams, the waitlist for public housing is excessive and there isn't enough affordable housing to meet the needs of people who are homeless or at risk of homelessness. Neami is deeply concerned that despite a population increase of 35% since 1994, there has been an ongoing decline in the amount of social housing (from 6% to almost 4%) with levels 'chronically' low at the start of the pandemic. Place Neami would like to see a national strategy that commits to clear social housing targets.

Neami, Bridge Housing and the NSW Department of Communities and Justice have been working together since 2018 to fund 90 long-term housing placements through a head lease housing model. This has enabled the program to offer subsidized rental housing in the absence of appropriate social or public housing options. The STEP to Home program provides wraparound support to people sleeping rough or who experience secondary homelessness and has delivered strong outcomes with 88 participants (of 103) still housed as of March 2021. The STEP to Home program operates a Housing First model and provides post-crisis support for up to three years. The program has seen positive results including increased housing retention and stability, improved mental health, increased community and social connection, and increased participation in employment. Whilst the program grew partly out of a need for new sources of accommodation, providing housing to tenants through

¹¹ Centre for Social Impact. (2022). Step to Home Program Evaluation. January 2022. This report is due for release in 2022; please contact Neami for further clarification.



⁷ The Advance to Zero database working group and Micah Projects are currently working on implementing Statistical Linkage Keys which would enable tracking of respondents across agencies and States. Investment in linking data between sectors such as homelessness, health, and justice would provide a great number of benefits including improving policy and program effectiveness and enabling accurate cost-benefit analysis.

⁸ Everybody's Home. (2022) Everybody's home budget position paper: A plan to fix Australia's Housing Crisis. https://everybodyshome.com.au/federal-election-2020-what-we-are-calling-for/

⁹ AHURI. (2020). Examining housing policy responses to COVID-19 Policy Evidence Summary. November 2020. https://www.ahuri.edu.au/sites/default/files/migration/documents/PES-FR343-Policy-coordination-and-housing-outcomes-during-COVID-19.pdf

¹⁰ Everybody's Home. (2022) Everybody's home budget position paper: A plan to fix Australia's Housing Crisis. https://everybodyshome.com.au/federal-election-2020-what-we-are-calling-for/

the traditional rental market delivers many benefits including building the person's rental history, providing a genuine sense of home and fostering choice and control over the person's own affairs.

Evidence from the sector is that during the pandemic there has been genuine headway to get people off the streets and into safe accommodation. ¹² Yet the innovative STEP to Home model and other head lease programs in the sector are at risk due to the nation-wide increase in the cost of rent particularly in regional areas where the annual growth rate in rental costs has far outpaced that of capital cities during 2021. ¹³ The situation is further exacerbated by the displacement of families, and the loss of thousands of habitable properties across Australia as a result of flooding and bushfires. ¹⁴ A proactive, multi-pronged approach to increasing the number and type of accommodation available is integral to ending homeless. Without this commitment, we are likely to see a continued 'homelessness crisis' with people cycling between homelessness and crisis services. ¹⁵

We also recommend greater investment in the development of accessible housing. In a recent report by the University of Melbourne, 73.6% of respondents with mobility limitations reported that they resided in housing that either partly met their accessibility needs or did not meet their accessibility needs at all. The research found that respondents with lower incomes or in private rental were more likely to live in housing that was not considered 'accessible'. ¹⁶ In the evaluation of the STEP to Home program, a lack of accessible housing presented a barrier to some people seeking support through the program. These barriers are further compounded by a highly competitive rental market; people who require accessible properties or who require modifications to their property may be considered less desirable as a tenant in a market saturated by demand. The University of Melbourne study found that more than 70% of people with high support needs and 50% with low support needs reported that living in an inaccessible house negatively impacted their mental health and wellbeing. ¹⁷

There is also a need for housing that is culturally appropriate; Australia's dominant housing model is based on historical assumptions of the standard Australian tenant profile and this has not been reviewed in line with the changing Australian demographic. Whilst it is important to ensure we do not adopt a one-size-fits-all approach to any group, there is much research that suggests there is a need to increase the number of properties that suit the needs of larger families or to accommodate the social and living needs of diverse cultural groups. Neami recommends that in the development of a national housing and homelessness strategy the government must invest in developing housing that meets the needs of a diverse range of communities and cultural groups.

AHURI states that 'what works' for successful First Nations supported tenancies is the recruitment of local Indigenous workers providing dedicated and culturally-appropriate wraparound support to the family and kinship unit.¹⁹ Neami delivers the Sustaining Tenancies program in NSW in an equal partnership model with Tharawal Aboriginal Corporation. The program ensures that Aboriginal staff provide wraparound support to First Nations tenants and link tenants into relevant and culturally safe and appropriate services. The program acknowledges the cultural housing needs of First Nations consumers and support is provided to the entire household whereas in other housing programs there

¹⁹ Moskos, M., Isherwood, L., Dockery, M., Baker, E. and Pham, A. (2022). What works' to sustain Indigenous tenancies in Australia. AHURI Final Report No. 374, Australian Housing and Urban Research Institute Limited, Melbourne, https://www.ahuri.edu.au/research/final-reports/374, doi: 10.18408/ahuri3122901.



¹² AHURI. (2020). Examining housing policy responses to COVID-19; policy evidence summary. November 2020.

 $^{^{13}}$ CoreLogic. (2021). Growth in regional rents is almost three times that of capital cities. https://www.corelogic.com.au/news/growth-regional-rents-almost-3-times-capital-cities

¹⁴ Approximately 3500 homes were lost to bushfire between 2019-2020 accordingly the Centre for Disaster Recovery; NSW State Emergency Service report that more than 3000 homes are uninhabitable due to recent flooding (The Sydney Morning Herald, 13 March 2022).

 $^{^{15}}$ Everybody's Home. (2022). Everybody's home budget position paper: A plan to fix Australia's Housing Crisis.

https://everybodyshome.com.au/federal-election-2020-what-we-are-calling-for/

¹⁶ Wiesel, I. (2020). Living with disability in inaccessible housing: social, health and economic impacts. Melbourne University; School of Geography. 22 October 2020.

¹⁷ Wiesel, I. (2020). Living with disability in inaccessible housing: social, health and economic impacts. Melbourne University; School of Geography. 22 October 2020.

¹⁸ Findlay, M. (2011). Social housing for cultural diversity. Australian Planner. 48:1, 2-11, DOI: 10.1080/07293682.2011.530584

is a tendency to attach the support element to a main resident or couple and excluded extended family.

Neami's Wadamba Wilam housing and support program in Melbourne supports Aboriginal people with long histories of homelessness, trauma and incarceration to sustain their housing, re-establish their social and cultural networks, and rebuild their lives. Wadamba Wilam draws together Neami, the Victorian Aboriginal Health Service, ReGen and Northern Area Mental Health Service, to deliver holistic support to meet the mental health and wellbeing and alcohol and other drug support needs of First Nations persons whilst providing support to enable the person to maintain secure housing. The program is highly successful with 81% of consumers in sustainable tenancies and 69% maintaining their housing over 12 months. Wadamba Wilam's holistic wraparound approach has resulted in a 61% decrease in inpatient psychiatric admissions and 72% of consumers have reduced their alcohol and ice use. Rey elements of the program that have led to successful outcomes include strong engagement and collaboration with Aboriginal partners, use of Aboriginal social and emotional wellbeing principles and culturally safe practises delivered by a multidisciplinary team.

Neami would like to reinforce the recommendation of the National Aboriginal and Torres Strait Islander Housing Authority for a dedicated National Aboriginal Housing Strategy and recommend that all levels of government and the community support sector ensure that Aboriginal and Torres Strait Islander people are the dominant voice in any decisions that are made about them.²¹

Mental illness should be recognised under the NHHA as a vulnerability factor across all of the NHHA priority homelessness groups.

There is a high prevalence of mental ill-health amongst people experiencing homelessness; the Australian Institute of Health and Welfare consider people with current mental health issues a 'client group of interest' together with people affected by family and domestic violence and Aboriginal and Torres Strait Islander communities. The percentage of Supported Homelessness Services (SHS) clients experiencing a current mental health issue increased from 31.9% to 34.3% per 10,000 nationally between 2016 and 2021. Of these people, 41% experienced family and domestic violence and 23% were impacted by alcohol and other drug use. Truther, in addition to factors (i.e. unemployment, low educational attainment, AOD misuse, disability, trauma, and family and domestic violence) mental health issues represent a key risk factor in the likelihood of a person becoming homeless.

Evidence from the Advance to Zero²⁵ study found that of the 20,000+ responses:

- Almost half of long-term rough sleepers self-reported they had a diagnosed mental health condition and problematic alcohol and drug use.
- Almost 40% of respondents had been taken to hospital against their will due to concerns for their mental health (rough sleepers were more likely to have three or more inpatient episodes than non-rough sleepers).

https://www.aihw.gov.au/getmedia/82f724a3-c82a-412f-bb7b-5424fcfe1a4e/Australias-welfare-snapshots-2019.pdf.aspx ²⁵ Flatau, P., Lester, L., Seivwright, A., Teal, R., Dobrovic, J., Vallesi, S., Hartley, C. & Callis, Z. (2021). Ending homelessness in Australia: An evidence and policy deep dive. Bulletin No 1 Ending homelessness in Australia: Understanding homelessness; taking action. Perth: Centre for Social Impact, The University of Western Australia and the University of New South Wales, pp. xxii. https://doi.org/10.25916/ntba-f006.



²⁰ Chiera, J., Burns, A., Lovatt, M., Kennedy, A., Raudys, J. & Waring, J. (2021) Wadamba Wilam: Practice approach. Neami National: Melbourne.

²¹ National Aboriginal and Torres Strait Islander Housing Authority. (2018). Submission on the Closing the Gap refresh: Targeting housing and homelessness. August 2018.

²² AIHW. (2021). Australia's welfare snapshots 2021: Homelessness and homelessness services. Canberra. 7 December 2021.

https://www.aihw.gov.au/reports/australias-welfare/homelessness-and-homelessness-services.

²³ AIHW. (2021). Specialist homelessness services annual report 2020–21, 7 December 2021.

https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-annual-report/contents/summary ²⁴ AIHW. (2019). Australia's welfare snapshots 2019. Canberra.

• Almost half (48%) had spoken with a psychiatrist, psychologist, or mental health professional in the last six months

Additionally, commonly self-reported mental health diagnoses included depression (70%), anxiety (67%), and post-traumatic stress disorder (42%).²⁶

The acknowledged relationship between mental health and homelessness has been described as a 'never-ending loop', ²⁷ that requires a specialist response and that cannot be solved by increasing housing stock or the number of housing workers in the system. Mental health can be exacerbated by the experience of homelessness together with any of the risk factors articulated above, and conversely, people experiencing mental illness can engage in behaviour, or be affected by circumstances (e.g. hospitalisation, loss of employment) that can jeopardise their accommodation. The responsibility for best practice in housing and homelessness service delivery is shared between federal and states/territories and thus the NHHA must recognise the prevalence of mental unwellness in the six priority groups and the wider community and commit to funding mental health-focused support to assist people at risk of becoming homeless to maintain their housing. Neami believes that a national housing strategy that funds wraparound support will reduce the likelihood of people becoming homeless by providing support to secure and maintain housing during times of crisis. Further, given the evidence that people with mental illness and complex behaviours are often denied entry to sustainable housing, there must be an investment in resourcing a complex capable workforce able to support people with a range of needs and complexities.

Conclusion

Neami believes that the solution to homelessness and housing security is already in reach but to realise an end to homelessness will require high-level commitment, coordination and investment from the federal government working in collaboration with the states and territories to support the housing and community sector to implement evidence-based housing and homelessness initiatives. We believe this is best delivered through the development of national housing and homelessness strategy that delivers a roadmap out of homelessness and housing insecurity, and which provides a clear framework to guide the application of a future National Housing and Homelessness Agreement.

Neami would like to draw the Productivity Commission's attention to the *Ending Homelessness in Australia: An Evidence and Policy Deep Dive* report²⁸ prepared by the Centre for Social Impact which highlights significant innovations across the housing and homelessness sector as well as providing evidence of the benefits of investment in expanded data collection and monitoring for improving our understanding and capacity to respond to trends and issues in the housing and homelessness system.

Finally, whilst it is widely acknowledged that there is a shortfall of affordable housing, particularly evidenced through the shortage of social housing and rapidly increasing rents across the nation, Neami hopes that a national strategy will illuminate and address the need for innovative housing models that meet the diverse needs of all Australian communities and that mental health and wellbeing supports are acknowledged as integral to ensuring highly vulnerable people with complex needs and risk factors remain housed.

²⁸ Flatau, P., Lester, L., Seivwright, A., Teal, R., Dobrovic, J., Vallesi, S., Hartley, C. & 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



²⁶ Flatau, P., Lester, L., Seivwright, A., Teal, R., Dobrovic, J., Vallesi, S., Hartley, C. & Callis, Z. (2021). Ending homelessness in Australia: An evidence and policy deep dive. Bulletin No 1 Ending homelessness in Australia: Understanding homelessness; taking action. Perth: Centre for Social Impact, The University of Western Australia and the University of New South Wales, pp. xxii. https://doi.org/10.25916/ntba-f006.

²⁷ Balasuriya, L., Buelt, E & Tsai, J. (2020). The never-ending loop: Homelessness, psychiatric disorder and mortality, vol. 37, Iss. 5. https://www.psychiatrictimes.com/view/never-ending-loop-homelessness-psychiatric-disorder-and-mortality.

Neami thanks the Productivity Commission for the opportunity to submit our recommendations regarding the review of the National Housing and Homelessness Agreement. We welcome the opportunity to provide the Commission with any further information they require and can be contacted via policy@neaminational.org.au.

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