



NADA

network of alcohol and
other drugs agencies

NADA Submission: National Housing and Homelessness Plan 20 October 2023

The Network of Alcohol and other Drugs Agencies (NADA) is the peak organisation for the non government alcohol and other drugs sector in NSW. We represent 80 organisational members that provide services in over 100 locations across NSW. They provide a broad range of services including health promotion and harm reduction, early intervention, treatment and continuing care programs. Together, we improve the health and wellbeing of people who use, or have used, alcohol and other drugs across the NSW community.

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ABOUT NADA

The Network of Alcohol and other Drugs Agencies (NADA) is the peak organisation for non government alcohol and other drugs services in NSW. We advocate for, strengthen and support the sector. Our decisions and actions are informed by the experiences, knowledge and concerns of our members.

We represent 80 organisational members that provide services in over 100 locations across NSW and the ACT. They provide a broad range of alcohol and other drugs services including health promotion and harm reduction, early intervention, treatment and continuing care programs. Our members are diverse in their structure, philosophy and approach to alcohol and other drugs service delivery.

We provide a range of programs and services that focus on sector and workforce development, data management, governance and management support, research and evaluation, sector representation and advocacy, as well as actively contributing to public health policy.

Together, we improve the health and wellbeing of people who use, or have used, alcohol and other drugs across the NSW community.

NADA has award level accreditation under the Australian Services Excellence Standards (ASES), a quality framework certified by Quality Innovation and Performance (QIP).

To learn more, visit www.nada.org.au.

PREPARATION OF THIS SUBMISSION

NADA has developed the following submission for the National Housing and Homelessness Plan. The comments provided in this submission have been prepared by NADA staff, on behalf of its members.

TAKE AWAY MESSAGES FROM NADA'S SUBMISSION

- Reduce barriers to addressing housing support for people who use, or have used, alcohol and other drugs.
- Allocation of funds for transitional housing and other housing supports for alcohol and other drug services, prisons, juvenile, detention and mental health units to prevent people being exited into unstable accommodation and homelessness.
- Commitment to building community hubs and community spaces in areas of growing populations. All future social and community housing planning process must include community input and buy-in to address social housing stigma and the development of pockets of disadvantage.

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QUALITY HOUSING: A HUMAN RIGHT WITH A BIG IMPACT

"I've gotta start thinking about housing. Like, do I start putting that in place for when I do complete [drug and alcohol program], once I complete it? I've got nothing. I've got nowhere else to go. I don't wanna hang around a rehab until I can find something. I've got all the support networks in place what I need, what I wanna do and wot-not, how, you know? And that's what I really need to put in place for my daughter and myself."

Quote from an Aboriginal male participant in research on what supports positive outcomes of drug and alcohol treatment.

Those who work in the alcohol and other drug sector (AOD) hear statements like this on a regular basis and see the impact of unstable and unsafe accommodation on the people they work with. They observe the increased risk of exposure to violence, deterioration of mental and physical health, unsafe drug use and overdose, the removal of children from families, the disengagement from work, education, loss of connection to land, culture, and community because of the lack of safe, ongoing flexible housing options able to respond to changes in circumstance, societal and natural events.

NADA has a vested interest in sharing the experiences from our membership and welcomes the opportunity to provide further feedback into the implementation of this plan.

Having access to safe and stable accommodation is a basic human right. For people who attend AOD services, this is crucial. To live in a home, is the foundation which contributes to the psychological safety that people need to operate at their best. Unstable accommodation impacts people's capacity to engage with their community, work, education, training, and activities which promote connection and meaning. Unstable housing restricts people's capacity to participate in activities that support their mental and psychological health and to address issues like risky or problematic substance use.

Housing is a social determinant of health and wellbeing for all people. And specifically linked to achieving successful AOD treatment outcomes, from recent sector research - "Performance measurement in alcohol and other drug treatment services" - the role of housing was evident with service users, in particular for Aboriginal men. The research group participants felt that AOD treatment providers should assist people to access housing when they leave treatment and there has been the suggestion that there is a need to consider this as part of future funding and performance measurements.¹

¹ Stirling, R. (2023). *Performance measurement in alcohol and other drug treatment services*. doi.org/10.26190/unsworks/24682

NADA believes that an effective housing plan requires:

- Innovative development, management, and equitable provision of housing options
- Strategies for early identification of people at risk of homelessness
- Workforce development and capacity building for the specialist housing sector and complementary service sectors, including the peer workforce cross sector collaborations and partnerships
- Health promotion and disease prevention strategies such as setting homelessness targets
- Awareness raising around existing specialist services
- Strategies to address stigma, discrimination and stereotyping of people who are homeless and at risk of homelessness.

NADA also raises housing concerns for Aboriginal and Torres Strait Islander communities and advises specific consultation to ensure implementation strategies are culturally safe and applicable.

The learnings from the COVID lockdowns and disaster events over the last few years has highlighted the importance of community connection. This learning needs to be applied to the housing plan which needs to view housing in a context broader than bricks and mortar, and beds in facilities where people can lay their heads, but through a wider social ecological lens of where these homes are located, their connection to the land, access to public and community spaces, and supports when things are tough.

In regional towns, access to specialist homelessness services is challenging. Regional areas are experiencing high demand for housing as people seeking a lifestyle change and more affordable, quality housing options moved out of cities supported by hybrid work conditions. Feedback from members across the AOD sector, advise that there are not enough crisis beds or suitable crisis accommodation options particularly for women leaving domestic violence and young people. People in rural and regional areas, with few resources and often in distress are required to travel significant distances, reportedly for over two hours on public transport to attend housing service appointments or wait for appointments with outreach services, who may only visit fortnightly or monthly.

Waiting lists for social and community housing are extensive, often up to ten years, highlighting the lack of resources to meet the demand. People are expected to move away to other areas to secure accommodation, leaving their networks of support, family and community connections.

Workers in outreach alcohol and other drug services have advised that people will secure accommodation in remote parts of regional areas because it is cheaper and there is less competition but where there can be poor roads, no to intermittent internet and phone service, where the home can be a converted shed, caravan, or garage, with little heating or cooling. These isolated locations impact on the frequency of their participation in alcohol and other drug treatment and capacity to attend support appointments, community events, work and participate in education. In smaller towns there is the increased risk of discrimination and being known as a substance user which can impact on the success of tenancy applications especially in towns where there are few real estate agents.

With COVID lockdowns, hybrid working conditions, the migration to regional towns, and the need for rehousing from neighbouring disaster impacted areas, additional strain has been placed on local housing markets. As a result, some of our statewide member services have changed their aftercare/transition housing criteria, only taking those from the local area as they are more likely to be rehoused on completion of the aftercare program.

In urban areas, although this can be applicable in regional areas, there are few accommodation options that allow pets and research has shown that animals are a vital support for many people with compromised mental health and social disadvantage. NADA members have recounted stories of having people arrive at their services with their animals, whilst homeless. One service described at times having birds, cats, dogs, and the occasional pet guinea pig staying in the back yard as clients arrived with their respective animals. Most services are unable to accommodate animals and access to pet boarding while a person is in crisis or temporary accommodation is costly and prohibitive.

The NSW Special Commission of Inquiry into the Drug 'Ice' heard from people with lived experiences, families, service providers, academics, and other experts. NADA supports the findings from the final report related to homelessness, outlined here:

Chapter 17: Homelessness

132. Stable housing is a critical foundation for effectively addressing harmful drug use. Research indicates that people without accommodation or with marginal or inadequate housing face a greater risk of developing problematic patterns of drug use.

133. In addition, people using drugs in harmful ways often have complex, interrelated needs that cannot be properly addressed while housing is unstable. Without stable housing, people who use ATS are at an increased risk of experiencing social and family isolation, financial debt and poor mental and physical health, and are less likely to engage in treatment.

134. An important component of any AOD strategy is to prevent homelessness and provide supportive housing to people who are already homeless.

135. People experiencing homelessness need stable housing before they can engage effectively with other services. This approach is called 'Housing First', the guiding principle of which is 'that safe and secure housing should be quickly provided prior to, and not conditional upon, addressing other health and wellbeing issues'. Many submissions to the Inquiry advocated for a Housing First approach that prioritises safe housing and assists people to maintain their tenancies so they can then address their drug use and other health and social problems.

136. Based on the evidence received by the Inquiry, and the promising results of Housing First approaches internationally, the adoption of a Housing First approach offers an opportunity for NSW to strengthen its response to ATS (Recommendation 66). The association between the use of ATS and homelessness, and the challenges housing services face in meeting the needs of people who use ATS, indicate that people who use ATS should be regarded as a priority group for future Housing First approaches in NSW.

137. Given the importance of stable housing to effective ATS treatment, the NSW Government should ensure that those who undertake residential drug rehabilitation or detoxification do not lose their social housing while they undergo treatment (Recommendation 67). The NSW Government should also consider implementing a Housing and Accommodation Support Initiative, similar to that currently provided to those with a severe mental illness, for people who use ATS (Recommendation 68).

138. Effective service responses to address the housing needs of people who use ATS should: recognise access to housing is a human right; recognise and respond to the fact that experiences of homelessness result from multiple complex factors; recognise that homelessness can be prevented and include appropriate prevention strategies; include a focus on integrated service provision; adopt a Housing First approach; and involve communities as part of the solution.

Recommendation 66

A. That the NSW Government pilot a Housing First approach to support people who use amphetamine-type stimulants and are experiencing housing instability, that provides no-barrier housing, primary and mental health, and psychosocial supports to help address drug-related harms in the homeless population.

B. That in developing the approach, the Government consider the Portland Hotel Society model and its applicability to the NSW context.

Recommendation 67

That the NSW Government ensure that social housing tenants who undertake residential drug rehabilitation or detoxification do not lose their housing while undergoing treatment.

Recommendation 68

That the NSW Government consider a model similar to the Housing and Accommodation Support Initiative for people who use amphetamine-type stimulants, and which includes services that provide a full range of flexible psychosocial supports including access to AOD treatment/rehabilitation.

Reference: *State of NSW. (2020). Report of the Special Commission of Inquiry into crystal methamphetamine and other amphetamine-type stimulants*

<https://www.dpc.nsw.gov.au/publications/special-commissions-of-inquiry/the-special-commission-of-inquiry-into-the-drug-ice/>

ADDRESSING HOMESLESSNESS: REDUCE THE RISKS & BREAKING THE CYCLE OF CHRONIC HOMELESSNESS

SHORT TERM ACTIONS REQUIRED

- The Link to Home system provides a valuable service, however it needed to be overhauled. NADA members reported concerns about people being offered accommodation in locations hours away by public transport, often in appropriate, unsafe facilities such as a pub room for a young underage person. The hours of assistance need to be more flexible. Currently there is an expectation that people will call at a set time in the morning which does not reflect the reality of living without any stable base, little to no money and generally reliant on public transport or with limited funds for petrol. The Link to Home Service needs a brokerage component to assist with the purchase of bus, train tickets and petrol vouchers. A significant increase crisis accommodation options need to be sourced. Extend expressions of interests to an expansive range of businesses, who have premises that may be underutilised and increase incentives for business to provide longer term stays. Avoid utilising the one accommodation services to reduce the risk of stereotyping accommodation places and the people who access accommodation in this way.
- Provide communication, accidental counselling, and service orientation training to Link to Home workers. Workers in AOD services have identified concerns about the tone and way in which people are addressed, the lack of knowledge of service areas and geographical distances and poor awareness of the experience of homeless people. Workers have described having to wait with a client on hold for up to an hour and times where calls are not answered. Peer workers would be highly valuable in this setting in supporting an inclusive and non-judgemental work culture. Investment and development of the early intervention and housing peer workforce is required.
- Develop a national pet boarding scheme to house people's pets while incarcerated, escaping domestic violence, attending a residential AOD program or staying in hospital or a mental health facility.
- Feedback from workers, particularly residential facilities is that participants identify that they have limited life skills such as cooking, preparing cost effective healthy meals, budgeting and basic household maintenance and management skills. Funding and training for living skills programs that consider the specific needs of different groups of people are needed. NADA member services have demonstrated innovative ways of providing these services to their clients, usually funded through donations, partnership programs and philanthropic one-off grants and delivered by volunteers, developing projects such as productive vegetable gardens and farm to plate skills programs.

- Incentive schemes for private landowners to lease properties to community housing organisations, with varying incentives for home improvements and modifications to accommodate the needs of people with pets, physical and mobility needs and surety schemes for people with problematic rental histories.
- Maintain funding to all community-based drug and alcohol outreach services, such as Continuing Coordinated Care Program AOD teams and increase their scope to work directly with housing providers and institutions such as prisons, and mental health units to provide transitional housing support and referral pathways to longer term housing options through additional housing casework positions.

MEDIUM TERM ACTION REQUIRED

- Develop a specific Aboriginal and Torres Strait Islander National Housing and Homelessness Plan designed by Aboriginal housing organisations, leaders, and communities with objectives that align to the National Plan and utilising the Housing First framework.
- Develop specific housing and homelessness plans with people with visible and invisible disabilities, newly arrived and refugee populations and plans targeting young people being released from juvenile detention utilising the Housing First Framework.
- Allocate funding to all residential rehabilitation programs to develop and deliver aftercare and transition housing programs, enhancing the capacity of services to provide continuing care and increase capacity for clients to procure and maintain long term, stable and sustainable housing.
- Significantly increase youth crisis accommodation funding extending it to medium term stays ensuring that rural, regional, and remote communities are targeted. Ensure that youth residential AOD facilities, child and adolescent mental health inpatient units have dedicated funding for housing attached to their facilities and dedicated referral pathways and partnerships.
- Increase community housing opportunities for young people in consultation with youth advisory groups.
- Develop community consortiums to deliver services in housing hubs which incorporate community banking, community legal services, home ownership schemes and cooperative managed housing. These hubs would offer housing across a continuum of options that meet the needs of specific population groups and accommodate the life event trajectory which shape people's accommodation needs. The housing is matched to the person's needs, not the other way around.

LONG-TERM REQUIRED

- Long term housing and infrastructure planning to map housing availability and predict future housing needs. A social-ecological mapping process is dynamic, live, and able to respond to societal, economic, and climatic events and includes the cultural and social and health perspectives in understanding and predicting future needs. It would incorporate planning for community centres within public spaces, shared spaces and identified social supports and be responsive to the changing needs and structures in families and communities.
- Development application laws reviewed to include alternative housing opportunities such as tiny homes, dual dwelling sites, and set quotas of new land releases designated to social and community housing, identified public spaces and legislation that stipulates and sets minimum standards of proximity to facilities, transport, social and community services.

CONTRIBUTING FACTORS TO HOMELESSNESS FOR PEOPLE WHO USE SUBSTANCES

- A large percentage of people who use substances, experience compromised mental health and have histories of trauma. They require stable accommodation to maintain their health and wellbeing. There is a stark lack of options for people being discharged from mental health hospitals, defence force deployment, and released from adult and juvenile jails. There is a need for transition accommodation for people requiring safe living environments post detox, prior to entry into residential AOD rehabilitation programs and on completion or in the event of an unplanned exit.
- For people who are transient in their housing and using substances, it can be difficult to manage the housing applications processes, not having access to paperwork, identification, a stable postal address, or regular phone number and expected response times do not account for delays in receiving requests for further information. In regional, remote, and rural areas, people may travel great distances to access a housing service, submit paperwork or have wait until a visiting housing service is in town.
- Specialist homelessness services have reported that they are struggling to find housing for people and are regularly turning people away. Many services have had to tighten their eligibility criteria and prioritise local people, unable to assist the people who arrive from other areas hoping for more affordable options or greater availability. This is particularly impacting areas that have already felt the impact of the tree and sea change population movements combined with the housing impacts of recent natural disasters.

- People attending a residential treatment program may end up surrendering their rental, social or community property, or having to rely on the support of friends and family to maintain the financial commitments or place themselves under significant financial pressure increasing the risks of homelessness.
- The practice of “blacklisting” needs to be regulated and guidelines put in place. This practice is done by individual real estate agents and can be included in a National Tenancy database. People are not adequately advised where this information is stored and there are no consistent review practices or opportunities to be removed from these lists, legitimate or not.
- AOD services have identified the practice of blacklisting as a major barrier in securing safe, stable accommodation after leaving a residential program. Community awareness and information needs to be widely available to support people to respond to this practice, including access to legal advice and representation.
- Disaster events impact people who are using substances and NADA members have spoken about the impact of recent disaster events. Clients have lost homes, needed to relocate and workers report that the number of properties available across the continuum of housing from crisis to private rental has significantly decreased and competition has heightened as disaster recovery schemes are also working to relocate dislocated communities. A significant number of member services report that their services become isolated during times of flooding, storms, or bushfires. This needs to be acknowledged in funding grants allocations. Services report allocating specific resources such as additional beds for staff unable to go home, large generators to ensure that refrigeration and lighting are maintained, and radios for communication.
- As part of a large research study, (Stirling, 2023) investigating the measures to deliver the best outcomes of AOD treatment, a number of focus groups were held with people with lived experience of AOD treatment. When service users were asked about what information they required to decide on where they would like to access treatment, there were a range of factors that participants reported would influence their decision, if they had choice. Responses included: the structure of the program (duration, treatment type, philosophy, cultural aspects, peer-based, post-treatment and social services support); peer feedback; success rate; if you can access residential rehabilitation while on opioid treatment; if you can smoke at the service; if you can continue to work; if you can keep your housing; and if there is a fee.

I'd like to know if there was an aftercare program after the thing ... To know that there's a structure base around supporting me with getting housing.

Young person from one of the research focus groups.

- There is a constant lack of safe crisis accommodation for young people with workers describing situations in which young people are being housed in rooms at a pub, with shared bathrooms and living spaces with adults.

SOLUTIONS AND RECOMMENDATIONS

- A response to the national housing crisis would incorporate a range of options, not just focus on one solution, and meet people's housing requirements at different ages and stages in their life.
- Collective strategies are required to increase housing stock and build the capacity of social and community housing assets to meet the actual need. Models and approaches to housing that have demonstrated their efficacy such as the Foyer approach for young people and the Housing First Framework which has been successful in parts of Australia and contributed to the significant reduction in the numbers of homeless people in Finland should be utilised and customised to meet the specific of different populations.
- Institutions that provide live in programs would be able to access extension funding for collaborative brokerage, phased transition accommodation to support and enhance their aftercare programs, provide post-prison short-term housing options, revamp the crisis accommodation; Link to Home service moving to a transitional to short stay focus.
- A targeted rural and regional housing strategy developed and imbedded in the National Plan, as solutions that may be effective in urban and metropolitan areas are often not transferable due to the unique identifiers of rural and regional townships.
- A targeted Aboriginal and Torres Strait Islander Housing Strategy developed and imbedded in the National Plan that expands the focus of the priority identified in the Closing the Gap Plan.
- Expand mobile multi-disciplinary teams who provide outreach services to communities to include housing caseworkers and peer workers able to support the sustainability of housing across all sectors, increasing opportunities for the early identification of housing distress.
- The National Housing and Homelessness Agreement is revised to accurately reflect and highlight the scope of need and areas for policy reforms and to be clearly linked to the national plan. It can determine benchmarking; setting homelessness targets and baselines for social and community housing stock, with minimums per capita of the population, itemise the known barriers to achieving these targets and provide a template of accountability with identified areas of responsibility for the implementation of the National Plan.

- Schemes could be delivered through local councils to identify empty building, shop fronts, and warehouses which are often left empty and commonly fall into disrepair when empty for extended periods. These often detract from the vibrancy of townships. Owners could be approached, subsidies made available and zoning regulations adjusted to create opportunities for social, community and longer-term tenancies.
- The impact of population movements during and following the COVID lockdowns need to be acknowledged as contributing to the escalation in house prices in areas that were formally affordable formally unattractive to home buyers looking to be closer to urban centres and employment options. There needs to be a recognition that this migration from cities to regional areas occurred with no infrastructure and facility planning and so all future planning needs to include buffer strategies to allow for societal events such as a pandemic and climatic event such as fire and flood.
- Supporting communities to develop localised Community Emergency Response Plans that are co-designed with community, local councils, and key stakeholders and that inform state operations and disaster response planning. These need to include identified evacuation/cyclone shelters and centres, crisis accommodation options and incorporate any community services that could provide temporary accommodation if required. During the floods, staff from some of our member services were mobilised to work in the relief centres, they have advised that the time taken to mobilise emergency housing increased people's distress and adversely delayed people's capacity to restore any normality to their lives. Arrangements with accommodation providers such as motels and caravan parks able to provide short-term and longer-term housing would be included in the plan.

MAKE HOUSING AFFORDABLE, AND LONG LEASES AND HOME OWNERSHIP POSSIBLE

- Establishment of a National Aboriginal and Torres Strait Islander Housing cooperative with the capacity to provide community banking and lending services. This could be a partnership with one of the large four banks or smaller community credit unions.
- Expansion of the First home buyers scheme criteria to assist people who return to the property market after hardship.
- Expansion and promotion of shared equity schemes with a joint commitment from both Commonwealth and State housing funds.
- Large land development applications have set quotas for the inclusion of social housing in all future housing developments.
- Local Council legislation needs to be reviewed to make it easier to gain approval for tiny homes, prefabricated sheds for housing and the conversion of attached garages

for additional accommodation. This will reduce the amount of poor quality and substandard buildings being rented out to people who are desperate for somewhere to live. A realistic and flexible approach would increase the standard and quality and provide some protection for people accessing these forms of accommodation.

- Develop the transferable lease scheme which would enable housing organisations to lease a property and then transfer the lease across to an individual. This could be expanded to transfers between family members.
- Property management incentives that encourage private property owners to lease their properties to community managed housing organisations, through tax exemptions and reductions in capital gains tax if a property has been used for social or community housing and is then sold.
- Opportunities to build inexpensive motel/boarding style accommodation in metropolitan and regional centres to increase options for people travel to work, while being able to sustain more affordable rental options and options to purchase property.
- Creating development application guidelines that support land developers to consider building a community rather than a collection of houses. This would provide a template for future development in ensuring specific components are always included in the development application such as the requirement for the acknowledgment of the Aboriginal land the development is built on, a community space or centre, public spaces, and quotas for social and community houses. NADA advocates for the investment in Australian made and sourced building materials and designated funding for alternative energy sources to be utilised in all future builds.
- Expansion of trade qualification opportunities, especially for rural and regional areas, opportunities to mobilise teams from lower employment areas to travel to where the work is.

THE PRIVATE RENTAL MARKET

- The development of rent ceilings to address the exploitation occurring in the current private rental market. These need to be realistically set to reflect economic climate, real estate markers, the cost of living and maintenance of properties while providing protection to tenants.
- Improved regulation of the physical standard of social and community housing properties. Members have fed back examples of people living in apartments with dangerous mould issues, appliances not working, broken stairs rails and feeling uncomfortable about consistently contacting real estate agents for fear of this jeopardising their tenancy.

REPLACE THE CRISIS APPROACH WITH TRANSITIONAL AND LONGER-TERM HOUSING

- Link To Home needs a register of physically accessible emergency accommodation options and work with accommodation providers to providing longer term stays particularly for people with specific needs.
- Expressions of interest with incentives offered can be extended to private accommodation providers such as motels, Airbnb, people with granny flats willing to provide accessible longer-term accommodation. Longer term stays evoke stability and are beneficial for both guests and accommodation providers. The current system of 24 hours in unsettling and counterproductive in addressing homelessness.

INVEST IN EARLY INTERVENTION

- Research needs to be undertaken to develop a brief intervention screening tool applicable across sectors to identify housing distress; people struggling to meet their obligations such as the payment of rent, property maintenance, organisation of timely repairs or difficulty sustaining mortgage payments.
- Development of cross sector pathways to ensure timely intervention once people in housing distress are identified.
- Increase public awareness of the appeals process with Revenue NSW and State Debt Recovery and avenues for review such as the Hardship Review Board. Increase the Board's scope to accommodate and respond to systemic barriers that contribute to chronic homelessness.
- Work with real estate peak governing bodies to introduce a referral process and pathways for the voluntary referral of people in the private rental market who are identified as experiencing an impacted tenancy.
- Financial and legal support programs need to be funded to support people to navigate the tenancy market, address tenancy issues and barriers to continued and future tenancies. This would include standard reviews and legal consultations with tenants who have been "blacklisted" by real estate agents in the private rental market. Increased opportunities to address rental arrears and to pay off rental through no-interest loan systems to repair debts in social and community housing properties through the Work Development Order Schemes.

TAKE A FRESH LOOK AT SOCIAL HOUSING

- Barriers are created when the various housing options are seen as separate and competing sectors. A hierarchy in housing is created with home ownership at the top. This reinforces disadvantage and informs stigma, discrimination, and stereotyping.
- The term social housing is no longer applicable. All housing should be known as community housing, with different options, lengths of stays and objectives. NADA believes that we have a community and social responsibility to ensure that everybody has the option of a safe place to live, not just a bed for the night.
- Social housing needs to be provided in the context of people's wider bio-psycho-social needs. Everybody needs to have the choice of being housed or not and to access the supports that ensure they thrive. The provision of safe, affordable, and sustainable housing requires the additional component of community and social capital. Just as property developers have now recognised that new housing estates need a pop in supermarket, childcare centres, and a gym, planning for social housing needs to follow similar planning principles. Social housing requires a responsive forward thinking business model.
- Social housing stock needs to diversify to accommodate the range of living arrangements from single people to extended families and chosen families and provide opportunities for organisations to sub-let social housing stock as needed.
- When supporting people with a range of issues, services need to be responsive. There are opportunities for cross-sector collaboration between Department of Communities and Justice and non-government mental health and alcohol and drug sectors in providing supported housing options as part of a step-up or step-down care planning. This would include specific supported accommodation services for families working with the department which incorporate psycho-social, parenting, and therapeutic skills programs.
- In-reach programs that provide intensive culturally safe mentoring and support are valuable in addressing the need for individualised approach to sustainable housing and a recognition that pro-longed contact with systems enhances feelings of shame and entrench people in welfare systems.
- Acknowledge the role of housing in contributing to physical and psychological safety and maintaining social connections to friends, family, and community, in protecting citizens from impacted physical and mental health and social isolation. This is done by ensuring accessibility to services, public transport, infrastructure, and community spaces.

- History and physicality of social housing on land that has been impacted by historically traumatic events needs to be considered in ensuring the psychological safety of where housing stock is located. The impact of climate changes and natural disaster events on areas that were traditionally safe places, has caused the dislocation of communities and loss of social and cultural heritage.
- To reduce stigma and discrimination, social housing properties need to be dispersed amongst privately rented or owned properties, to reduce collective discrimination to people living in social housing properties and improve the commitment of social housing providers to the timely repair and upkeep of properties, NADA members have told of clients living in social housing with broken appliances, doors, safety screens and plumbing which have been left in disrepair for extend periods despite reporting by residents and advocacy by service providers.
- Social housing needs to be a commitment for future land release housing estates with land developers required to allocate a certain percentage for social and community housing and include compulsory community consultation mechanisms and the adoption of a social ecological approach to future proofing housing levels to meet population growth and demand.
- Expansion of the social housing model to incorporate a social enterprise business model to increase opportunities for transitions into private long-term rental and home ownership, opportunities to coordinate low-interest loan opportunities and subsidy schemes, which could be extended to organisations such as mental health and drug and alcohol services to purchase and manage social housing stock. The concept of transferable leases could be introduced to address intergenerational and chronic homelessness and housing instability.
- Social housing has long waitlists and exhaustive processes to procure a place on the waitlist. Feedback from workers in the AOD sector indicate that applications and documentation are often lost and, if a person has had to move, is in prison, hospital or in a mental health unit may miss a housing offer or communication, which then will jeopardise their place on the waitlist. Workers advise this is a common experience, with their role being to advocate, but more often support the person to reapply. Application processes need to be overhauled to improve the service users experience and the efficiency of the process.

COMMUNITY HOUSING: A KEY ROLE IN REBUILDING LIVES AND COMMUNITIES

- The Common Ground model expanded and customised to respond to the needs of specific populations. The Foyer approach with a two-year intervention support for young people has merit in being expanded to adults, with a focus on individuals who are socially isolated and require additional support to reestablish their links to the community.
- The development of housing consortiums of service providers and multidisciplinary teams that can support tenants of social housing are the most effective in being able to provide timely and targeted specialist service provision. This model could be extended to support tenants in community housing, with opportunities for cross over between the areas.
- Tax incentives for private landowners to lease properties to community housing providers.
- Expansion of options to support access to home ownership such as the rent to buy schemes.
- Try again opportunity for people with poor rental records to participate in a supported scheme to address and revise this history.

PROVIDING SUSTAINABLE HOUSING IS A SOCIAL RESPONSIBILITY

- While NADA is not an expert body in this area it would recommend that development requirements and zoning rules be revived to increase housing opportunities and that there is an identified drive to strategies that encourage and recognise social responsibility.
- Some of the areas that could be considered are:
 - Increased authority and commitment for local councils to vary commercial zoning in response to need, to enable the use of unused commercial properties as housing and accommodation options.
 - Zoning rules only allowing single detached houses.
 - Allowance for dense development along key transport corridors and adjust height limits.
 - Review regulations limiting the building and use of secondary dwellings.
 - Review minimum carpark requirements around existing public transport
 - Review minimum floor sizes.
 - Increase subsidies for alternative energy source and environmentally sensitive builds.

- Ensure that environmentally sensitive areas are not approved for development to mitigate risk to vulnerable communities and decrease risk of impact from flood, storm, fire, or another natural event.
- Social and community housing new builds could incorporate alternative energy sources, community gardens to encourage community connectedness and the growing of food and contribute to environmental sustainability.
- Town planning needs to account for this and look at prevention, inform land release of environmentally valuable natural resources and land in disaster response and management. A member has observed following the floods in nearby areas, demand for housing as escalated, being re-homed in the area impacting and already tight rental market.
- Provide subsidy schemes and tax offsets to individual home and business owners who invest in adjunct energy solutions like solar panels, and energy efficient home accessories such as showerheads, off peak hot water systems and additional water tanks for garden and property protection. Off sets would be in the form of reductions on utility bills and other incentives. Property owners and community managed housing would be given incentives to install such modifications.
- Housing policies and planning needs to recognise the long-term ripple effect of natural events and ensure the response timelines reflect recommended best practice to reduce the psychological, social, and cultural impacts.

HOUSING AND HOMELESSNESS FOR ABORIGINAL AND TORES STRAIT ISLANDER COMMUNITIES

See, people are coming off the streets, right? Like Uncle said, he was homeless, you know. And people are coming off the streets, going in detox for seven days, going into the rehabs. And then they doing a 12-week program, short-term rehab, and then after that they probably can go to transition or like the levels they're doing and that. But, once they do all that, they've got nowhere to go... they could go back on the streets and then they've got nothing, nowhere to go, nothing to do, who to talk to, you know. And then they've wasted money on going back into relapse, you know? That's gonna lead into relapse. How are you gonna get these people who come off the streets into housing, you know? Because they're the number one at the moment.

Quote from an Aboriginal male participant in research on what supports positive outcomes of drug and alcohol treatment.

- NADA advocates that strategies are best designed by the Aboriginal and Torres Strait Islander community-controlled housing sector and community leaders who would be

able to determine the most effective ways to embed priority reforms and recommendation into the National Plan.

- NADA acknowledges the impact of colonisation on Aboriginal and Torres Strait Islander Peoples. Housing is a priority issue for communities and contributes to the high representation of Aboriginal and Torres Strait Islander people in custody and impacts on their capacity to participate in AOD treatment. There is a long problematic history of the inappropriate implementation of housing strategies without consultation or planning input from Aboriginal communities and organisations resulting in further hardship and disadvantage for communities.
- The plan needs to acknowledge the impact of racism and discrimination as a barrier for populations such as Aboriginal and Torres Strait Islander people when applying for rental premises and home loan applications. stigma and prejudice – cultural issues in stopping people being successful on rental applications.
- The physical location of social housing stock needs to be decided in consultation with local Aboriginal Elders and organisations to ensure that historical events in the area do not impact on the cultural safety of the locations and that placement is considered in terms of access to services and facilities. The design of homes requires cultural consultation to ensure that they provide buildings that can accommodate generations who chose to live together and are suitable and can accommodate extended family members and for with cultural family structures.
- The issue of housing sits in the Closing the Gap Outcome 9, and considering the impact of housing instability and poor-quality housing this National Plan requires a specific Aboriginal and Torres Strait Islander Strategy which is designed and led by Aboriginal Communities. The wording of the outcome focusses on overcrowding and this continues to perpetuate the perception that social housing is the only solution. It is not satisfactory that the focus is on the provision of social housing capital and does not expand the options. This strategy needs to include strategies that create opportunities for home ownership and potential for Aboriginal consultation in town and community planning at a local government level.
- The National Housing and Homelessness Agreement needs to clearly identify housing policy reform for Aboriginal and Torres Strait Islander communities which broaden the focus and identifies opportunities to develop Aboriginal owned and managed housing social enterprises delivered under a business model that also allows for input and negotiation with localised development applications and proposals for large land release projects and the construction of new housing estates to include a commitment to the inclusion of social and/or community housing as part of any new future development.

WOMEN ESCAPING DOMESTIC VIOLENCE

- In regional and rural areas, women's escaping domestic violence will either leave, moving to larger regions or closer to metropolitan areas to remain safe, while other women with their children to move to regional areas leaving behind networks of support for their family. These families are highly vulnerable to being injured, killed, to becoming homelessness and to intervention from the child protection system, often choosing to extend their time in the relationship to avoid homelessness and their consequential repercussions.
- Families working with the Department of Communities and Justice, particularly women and their children leaving domestic violence, lack safe and suitable accommodation options which results in women will staying in abusive relationships longer than planned. Refuges are often not able to accommodate male children older than 12 years of age, women with complex mental health issues or current use of substances. There is a need for an increase in funding for generalist refuges and to expand crisis and longer-term accommodation options for women.

ADULTS AND YOUNG PEOPLE INVOLVED WITH THE CRIMINAL JUSTICE SYSTEM

- Feedback from member service who specifically work with the prison populations is that people frequently arrive at their service with no change of clothes, at time no shoes, and no adequate identification and many with no plan of where they will spend their first night. These are the obvious ingredients for compromised sense of pride and esteem and mental health and intensified risk of returning to old alliances, substance use Specific funding and the application of the Housing First Framework needs to be applied with resources allocated to short-term accommodation social and community housing models with intensive case management and support transition from prison to community.
- The criteria for many housing programs exclude people with certain charges on their criminal histories further limiting their choice of housing opportunities.
- NADA would advise that this is a highly neglected group of people who a consistently caught in the chronic homelessness and incarceration cycle as has been well evidenced in the extensive body of research around this population.

ADULTS AND YOUNG PEOPLE WITH VISIBLE AND INVISIBLE DISABILITIES, AND OLDER PEOPLE

- Include in all new estate planning accessible social and community housing and community spaces.
- Significantly increase the number of specific purpose-built accommodation options for people with visible and invisible disabilities and expand services that support people to live independently in their own homes.
- Ensure that no person stays for extended periods in institutional care as there are transitional and supported options.
- including long-term physical and mental health conditions

AREAS FOR DATA COLLECTION AND FURTHER RESEARCH

- Where do people go if they are evicted from social and community housing?
- What is the rate of people who transition from social to community housing, to home ownership or long-term tenancies? Does this pathway exist and what can be established to support this?
- What success has there been in Australia and other countries with transferable tenancies? This could be explored in situations where the tenancy is transferred from an organisation to an individual or transferred from one family member to another?
- An annual survey held during Homelessness Week which should include prison populations for those identified who will be released into homelessness. This information could be captured via services providing frontline psycho-social and health services, both government, non-government, and volunteer driven organisations which will include community cafés and hubs, homelessness specialist services, emergency material aid organisation.
- Data from the minimum data sets from AOD and mental health services (and other related health and social services) could be reviewed to contribute to better understanding of people who are sleeping rough and transient.

THE CANADIAN NATIONAL OCCUPANCY STANDARD IN THE AUSTRALIAN CONTEXT

- The Canadian National Occupancy Standard could be considered a starting point, the context will need to be expanded to be inclusive of Aboriginal and Torres Strait Islander and Culturally and Linguistically Diverse communities and the range of living arrangements that people now choose. It needs to consider that the average Australian bedroom is around 3.2 X 3 m which is larger on average to other countries. We also

need to ensure that intergenerational families may live together and not exclude opportunities for communal living models.

FINDINGS OF THE PRODUCTIVITY COMMISSION

- NADA supports the finding of the Commission and calls for the National Plan to commit to addressing the housing crisis in Australia. NADA advocates for housing systems that are accessible, equitable, and economically sustainable and move away from viewing housing from a moral perspective, a reward for being a “good citizen” to the view that quality, stable housing enhances and builds the opportunities for an individual to live their best life, adding value and diversity to the communities in which they move, work and live.