

Domestic Violence NSW

Submission to the IPART: Review of rent models for social and affordable housing



About Domestic Violence NSW (DVNSW)

Domestic Violence NSW Inc. is the peak body for specialist domestic and family violence services in NSW. DVNSW provides a representative and advocacy function for specialist services and the women, families and communities they support. DVNSW's mission is to eliminate domestic and family violence through leadership in policy, advocacy, partnerships and the promotion of best practice. We work with our members, state and federal government and communities to create a safer NSW for all.

DVNSW member services represent the diversity of specialist services working in NSW to support women, families and communities impacted by domestic and family violence including:

- Crisis and refuge services
- Transitional accommodation and community housing providers
- Family support services
- Neighbourhood centres and drop in centres
- Specialist homelessness service providers
- Men's behaviour change programs and networks
- Community organisations working with high risk communities
- Specialist women's legal support services
- Women and children's support services
- Safe at Home programs

DVNSW members are all non-government organisations, some entirely government funded, others supported through philanthropic donations or partnerships with industry or the corporate sector. Many of our members have multiple government and non-government funding streams. DVNSW advocates for best practice, continuous system improvements and innovative policy responses to domestic and family violence including building workforce capacity and representation at all levels of government. We provide policy advice to multiple departments in the NSW Government on prevention and response. We work with communities and the media to increase awareness and represent the sector on a number of state and federal advisory bodies including the NSW Premier's Council on Homelessness, the NSW Domestic and Family Violence Council, the NSW Early Intervention Council, the NSW Reference Group for Men's Behaviour Change, the ANROWS Practitioner Engagement Group, AWAVA. We co-convene and provide a secretariat function for the NSW Women's Alliance with Rape and Domestic Violence Services Australia.

We acknowledge the work and practice wisdom of specialist women's services and domestic and family violence practitioners in the sector that underpin the recommendations in this submission. DVNSW thanks the specialist services that have developed best practice over decades of working with women and children and shared their expertise with us to make a submission to the IPART: Review of rent models for social and affordable housing. We also pay tribute to those who have experienced domestic or family violence and to our advocates, colleagues and partners in government and non-government agencies.

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Executive Summary

Domestic Violence NSW welcomes the opportunity to comment on the *IPART, Review of the rent models in social and affordable housing*. As the peak body for specialist support services in our state, we have worked closely and collaboratively with DVNSW members, broader networks of specialist practitioners and government colleagues to encourage participation of service users, mainstream and specialist support providers, communities and stakeholders with an interest in improving the responses for those experiencing or at risk of experiencing domestic and family violence (DFV) and homelessness and the barriers to positive outcomes the lack of available affordable housing presents, to produce a submission that reflects the diversity of the sector and our communities. We commend the work of IPART in releasing a comprehensive issues paper.

DVNSW along with other NSW stakeholders; NCOSS, Homelessness NSW, Shelter NSW, yFoundations and the Tenants Union have worked closely together on this review and DVNSW support and endorse each of their submissions. DVNSW also supports the submission of Address Housing, and endorses all recommendations made in this submission.

Homelessness, DFV and the scarcity of social and affordable housing in NSW is increasing and we need coordinated prevention, early intervention and response strategies that reflect solutions based in local community, consumer and sector expertise. A summary of DVNSW comments in this submissions are:

- There are significant barriers in accessing social and affordable housing and subsequently the lack of housing options have a direct link in being able to appropriately respond in a timely way to women, children young people and communities who have experienced DFV.
- Through our extensive work with DFV specialist services as well as mainstream services we know that every community has unique experiences, service systems, networks and populations, which shape the ability of services to appropriately house and support those who need it. We're also aware that too often services have to make clients fit programs rather than being able to offer truly client-centred responses. DVNSW recommends that the rent review modelling be designed to support client centred responses, and to minimise complicating an already very complex system.
- Even though this review focuses on addressing rent modelling DVNSW cautions that in addition to a *NSW Homelessness Strategy* there is an urgency to continue to advocate for at a State, and Federal level for resourcing to meet demand and for effective strategies that go beyond changing the rent modelling to address the ongoing and unrelenting crisis in affordable housing.
- The timelines of the review are unrealistic.
- The lack of social and affordable housing stock, a rent modelling review will not ameliorate the housing elephant in the room.
- Recognition that for some cohorts, social housing is for life. However, utilising language such as "*safety net and opportunity group*" reinforces unhelpful stereotypes and isn't useful to forwarding the discussion for what people's own aspirations are and could be with appropriate tailored support.
- The huge gap between the social and affordable housing rents and the private rental market

rents.

- In the UK social housing comprises of around 18%¹ of the rental housing, however, in NSW and Australia more generally, social housing is a very small component of the market. This fundamentally limits the subsequent options.
- A genuine intention of commitment to affordable and social housing, available to victim survivors and perpetrators.
- An emphasis on collaboration across government departments in recognition on the intersectionality of multiple sectors that respond to DFV
- Inclusion of specific strategies for cohorts most at risk of DFV and homelessness older women, children, young people, Aboriginal and Torres Strait Islander women, LGBTIQ communities, CALD women and women with disabilities.
- There is minimal, if any, user choice within the social housing arena with tenants assigned properties as and when they become available, this is largely allocated irrespective of whether that property is really suited to their needs and in the context of DFV, especially when we consider the safety and location of women, children and young people in relation to the perpetrator/s.
- There are too few affordable housing properties for individuals within the very low and low income thresholds
- The current income threshold for eligibility for public housing lease renewal fluctuates to the extremes depending on the median weekly rent of areas around NSW. Social housing tenants living in rural parts of NSW are able to rent in the private rental market without necessarily experiencing rent stress, while individuals living in metropolitan areas are not.
- Choices and options around housing are a key component of trauma recovery and DVNSW will continue to advocate for the rights of those leaving DFV to be able to make decisions on their living situation.
- A review of rent modelling will not appropriately address workforce disincentives. The complex reasons for a person's long term unemployment need to be addressed with a nuanced person-centred approach taking into account access to support, training and other employment assistance programs. Productivity Commission research² has concluded *"that it is the characteristics of individuals, and not the characteristics of the housing assistance that they receive, that matter to participation in employment. Simply shifting tenants to market rents and CRA is likely to leave many tenants financially worse off, yet without any greater ability to access employment. CRA recipients are no more likely than public housing tenants to find employment, after accounting for the characteristics of individuals."* We must have a more sophisticated evidence based approach to looking at the factors that limit long-term workforce participation.

¹ Social housing in Europe, accessed 11th December 2016,

<<http://www.lse.ac.uk/geographyAndEnvironment/research/London/pdf/SocialHousingInEurope.pdf>>

² Productivity Commission 2015, Housing Assistance and Employment in Australia, Commission Research Paper, Canberra.

Recommendations

1. The short timelines associated with staging this review are a major barrier to its success. Eligibility and prioritisation need to be thoroughly considered before the rental modelling is tackled. DVNSW supports a review of the timelines, as it does not appear to adequately address the interconnecting issues and their interwoven complexities.
2. The scope for this review is extremely broad and its remit should go well beyond a pricing approach; timelines need to be adjusted accordingly.
3. DVNSW stresses the importance of an elongated consultation period to explore the myriad of options that will arise when eligibility and prioritisation approaches are ultimately explored.
4. That the shortfall in social and affordable housing stock to be addressed urgently. A rental reform alone will not improve the sustainability and viability of the social and affordable housing system.
5. That applications for *Start Safely* are processed in a timely and efficient manner (we recommend a 5 working day turnaround) and be altered to take into account those on Newstart allowance and/or living in higher rental locations.
6. That a DFV victim-survivors safety is considered first and foremost when being allocated a property. It is vital that an appropriate property be sourced (ie in safe places, with safety measures/modifications made to the property if appropriate). Tenant choice must be mandatory for a victim-survivor of DFV.
7. That IPART focus on the provision of affordable housing for those on very low and low incomes and who are particularly vulnerable to becoming homeless, rather than an untenable narrowing of the assessment criteria for social housing.
8. That IPART review and implement all relevant recommendations from *A Plan for Change: Homes for Older Women and specifically take into consideration the unique experiences of DFV by this cohort and their specific social and affordable housing needs.*
9. That vulnerable and marginalised groups such as women with disability, CALD women and older women be considered in any priority of need.
10. In addition to the review, DVNSW recommends that a panel of experts be established and comprised of representatives from peak bodies and social and affordable housing academics.
11. Evaluation of income threshold for eligibility for public housing lease renewal set at a rate that is in line with the median rent in that area.
12. Transfers relating to tenants who are victim-survivors of DFV must ensure tenant choice and must only occur following a strong risk and safety assessment.
13. DVNSW recommends affordability modelling to understand the impact of removing concessions such as Family Tax Benefits Part A, B and the income of other members of the household. Allowances that are provided to people such as those with a disability, carers and foster carers, are given for specific reasons and therefore should not be included as assessable income. DVNSW supports the opinion that the approach proposed does not mitigate the risk of further disadvantaging those it claims to try and help.
14. That the Address Housing's new rental model be evaluated after the initial client's tenure period has been completed (5 years) and that subsequent learning's shape how we approach

providing social and affordable housing to those leaving DFV.

15. The NSW Government treat the extension of the NPAH as a matter of urgency and pursue it immediately with the Commonwealth Government.
16. A commitment to support and facilitate the integration of victim's voices to the *IPART review*.

Introduction and context

The NSW DFV system is struggling to cope with the demand in both the government and non-government response sectors. NSW Police report that DV related assaults have increased by 2% over the last five years whilst most other crimes types are stable or dropping³. Housing and accommodation services for victim-survivors of DFV are all at or over capacity. Practitioners constantly have to make choices about which families they can support and to what degree they can provide assistance because of demand.

This is not a problem that is unique to New South Wales. The latest Australian Institute of Health and Welfare data shows that around 520,000 Australians accessed homelessness services between 2011 and 2014, with 187,000 (36%) being adults and children seeking assistance due to domestic and family violence.⁴ We expect support seeking and Police reports to increase as awareness continues to grow and we need to design a system that is responsive to that growth in demand whilst resourcing and growing evidential practice in early intervention and prevention.

DVNSW recognises that there are no quick fixes when it comes to addressing system gaps or inconsistencies in service responses. Similarly, there is no "one size fits all" model solution for survivors of domestic and family violence that will work for every community in NSW. Domestic and family violence prevention is challenging, sophisticated work that requires an ongoing intergenerational community and government commitment.

DVNSW advocates that in all reform or review process we need to consider:

- That all NSW citizens should be able to access timely, well-resourced domestic, family and sexual violence support responses located in their communities that are client-centred, trauma-specialist, culturally-safe and are based on the premise that DFV is a gendered crime and a violation of human rights.
- That significant long-term investment is required to develop evidence-based domestic, family and sexual violence prevention initiatives and strategies including whole of school and community programs that address entrenched gender inequality and violence supportive attitudes.
- That the NSW Parliament make a long term, bipartisan government commitment and strategy to ensure a range of safe and affordable housing and support options are accessible to women and families impacted by domestic violence (as well as perpetrators of violence) including expansion

³ BOCSAR, 2015 http://www.bocsar.nsw.gov.au/Pages/bocsar_pages/Domestic-Violence.aspx

⁴ AIHW, 2016 *Domestic & family violence and homelessness 2011–12 to 2013–14* <http://www.aihw.gov.au/homelessness/domestic-violence-and-homelessness/>

of Staying Home Leaving Violence services, dedicated specialist DFV crisis accommodation, transitional, social and community housing and diverse private rental accommodation models and subsidies.

In order to address gaps systemically and with a long term shared vision, significant work must be undertaken engaging practitioners, policymakers and community leaders to design structures and programs that will work in local settings and build on existing practice wisdom. There is a huge gap between the social and affordable housing rents and the private rental market rents, which if isn't addressed systemically will see us continue to fight against rising prices, particularly in the Sydney area which is seeing unprecedented levels of weekly median rents. The review needs to explore the genuine barriers to affording private rents and plan accordingly.

The intersectionality of the cohorts of DFV victim-survivors and their needs within the social and affordable housing system needs to be explored to ensure that any changes to the rent modelling do not negatively impact upon them unintentionally.

Question 1 - How should the safety net and opportunity tenant cohorts be defined? Are there additional cohorts or sub-cohorts with distinct characteristics and needs?

DVNSW recognises that for some cohorts, social housing is for life. However, utilising language such as “*safety net and opportunity group*” reinforces unhelpful stereotypes and isn't useful to forwarding the discussion for what people's own aspirations are and could be with appropriate tailored support.

DVNSW would argue against tenant cohorts being categorised based on age. There should be no assumption that someone who is young, for example, is fit and able to work and therefore should form part of the opportunity group. Individual circumstances must be taken into consideration. Complex trauma such as domestic and family violence, for example, can impact on an individual's ability to find and remain in employment without adequate trauma-informed care and so they may need extended support at first (thus falling within the currently defined safety net group) and once at a certain point on their road to recovery be able to transition to the 'opportunity' group.

DVNSW recommends:

- That an elongated consultation period takes place to explore the myriad of options that will arise when eligibility and prioritisation approaches are ultimately explored.
- Transparency and a clear process around how we place tenants in tenant cohorts, how they will be judged, and on what criteria and who will be making these decisions.

Question 2: Are there any other issues with the current social and affordable housing system in NSW that are relevant to designing the eligibility criteria and rent-setting framework?

NSW has a lack of safe, affordable support options for families impacted by DFV. Women, children and young people who need to leave the family home often face lengthy waits and fragmented processes when attempting to secure crisis support and temporary or longer-term accommodation. There is a lack of crisis accommodation across the state and families are routinely referred to emergency temporary accommodation (often in motels or caravan parks) whilst they are waiting for longer-term options to be available.

Temporary accommodation is often unsafe and access to outreach support highly dependent on the capacity of services, which DVNSW members report being at or over capacity the majority of the time. Effective crisis and early intervention responses can be challenging when a victim-survivor of violence is unable to access safe and affordable accommodation.

Ultimately this means that women of all socio-demographics often stay in abusive relationships (or return to them) because of a lack of safe and appropriate housing options.

For some cohorts the challenges are amplified by fears that services or providers may not understand their needs. LGBTIQ people who have experienced DFV are vulnerable when accessing mainstream crisis services and emergency accommodation due to fears of (or experiences of) homophobia and transphobia and discrimination. Aboriginal and Torres Strait Islander families and culturally and linguistically diverse women (CALD) families experience similar difficulties finding safe and culturally appropriate accommodation where they can remain connected to family and community. Women with disability face multiple barriers to accessing information, support or accommodation that meet their needs.

There are multiple systemic and cultural barriers that make leaving the family home almost inconceivable for victim-survivors of violence. Many find it just too hard to contemplate leaving an abusive relationship and their home as the alternative solutions are filled with uncertainty. Older women and young women on lower incomes have very few options and are also vulnerable in a social housing system that is already overburdened. Older CALD women face multiple disadvantages and vulnerability as they often rely on family members for support and speak languages other than English so can experience language barriers.

Resourcing also needs to be strategic and focused upon prevention and early intervention, trauma informed care crisis responses and exploration and development of affordable housing options. Although DVNSW welcomes rental subsidy models such as Start Safely, it is not always effective. There are often lengthy wait times for applications to be processed, and rental opportunities are often missed during this time. Applicants cite having to wait four weeks for their applications to be processed. This varies between districts and there is little consistency across Housing NSW offices as to how quickly applications can be processed. In addition, the subsidy does not allow for a victim-survivor to find an appropriate home in areas where rental prices are high (for example, in Sydney). It is particularly difficult for any victim-survivors on Newstart allowance to find a home, even with Start Safely subsidy.

In addition, the current framework severely limits a tenant's choice over which social housing property they might call home. Once applicants reach the top of the wait list, they are generally allocated an available home based on their preference for the area in which they would like to be housed and the characteristics of the household such as the number of people and need for a particular type of property. The suitability of housing is therefore, by and large, down to luck and timing. Tenants cannot reject more than two, and in some cases one, without being sent to the bottom of the wait list. Victim-survivors of DFV will know what areas they can safely reside, and what properties they will feel safe in.

The limited scope for social housing tenants to choose their own home affects the responsiveness of the social housing system to meet the needs and preferences of tenants and has flow-on effects on the quality and efficiency of the system. It can also constrain a tenant's ability to make independent and informed decisions on, for example, where to safely send their children to school, which hospital to access, transport links and which food outlets and shopping centres to frequent.

DVNSW recommends:

- That the shortfall in social and affordable housing stock to be addressed urgently. A

rental reform alone will not improve the sustainability and viability of the social and affordable housing system.

- That applications for *Start Safely* are processed in a timely and efficient manner (we recommend a 5 working day turnaround) and be altered to take into account those on Newstart allowance and/or living in higher rental locations.
- That a DFV victim-survivors safety is considered first and foremost when being allocated a property. It is vital that an appropriate property be sourced (ie in safe places, with safety measures/modifications made to the property if appropriate). Tenant choice must be mandatory for a victim-survivor of DFV.

Questions 3: Do you agree with our proposed assessment criteria for the review?

Incentives for workforce participation

DVNSW questions the simplistic nature of suggesting that some rent models and government payments are a disincentive to tenants participating in the workforce. This assertion fails to understand the root causes of long-term unemployment and the impact complex trauma can have on the ability to participate in the workforce. This is particularly relevant for those who have been victims of DFV for a prolonged period.

Flexibility and choice for tenants

To have flexibility and choice for tenants the housing stock needs to be dramatically increased. The small number of available housing in NSW will make user-choice difficult to implement and sustain long term.

DVNSW recommends:

- A clear process overview needs to be transparent around how we place tenants in tenant cohorts, how they will be judged, and on what criteria and who will be making these decisions.

Question 5: Is it appropriate to more narrowly define the eligibility criteria for social housing to target people with the greatest need for this form of housing assistance? If so, how should the target group be defined?

DVNSW does not believe the criteria for social housing should be narrowed further, simply because there is not enough social housing stock. Whilst it is important to ensure priority to those who are of the greatest need – all those on the wait list require support and have a genuine need – particularly women and children impacted by DFV, regardless if they also meet an income threshold. Narrowing the criteria may also put additional pressures on the Specialist Homelessness Sector, who are already at capacity.

Social housing tenants tend to have higher employment rates and incomes than applicants for social housing, which reflects the positive effect that stable personal circumstances can have on employment. Recipients of social housing support have reported that they are in better health, are able to improve their employment situation and have better access to the services and supports they need once settled in stable accommodation (AIHW, 2015a).

There is a serious shortfall in the number of social and affordable housing properties, and urgent action is required. Attempting to improve system viability through further excluding the most vulnerable and disadvantaged won't help to address or rectify this shortfall. Access to much more affordable housing, especially for those in the very low and low income bands, increased rent assistance and continued support for individuals seeking to transition into independent living is vital.

Although as aforementioned, DVNSW does not believe the eligibility criteria should be narrowed. It is important that IPART consider the needs of priority groups who are the most vulnerable. Those impacted by DFV are already a priority in the current system – however there are hidden cohorts within this group that find securing appropriate social or community housing particularly difficult. CALD women, older women and women with disability need to be prioritised in any review.

Older Women

There is a rapidly increasing demographic of older women entering homelessness or housing stress with a clear link to prolonged abuse exposure. DVNSW notes the Homelessness NSW and Older Women's Housing Group's publication of *A Plan for Change: Homes for Older Women*⁵, which recommends some innovative and flexible solutions for this cohort:

- The NSW Government need to commit to develop a comprehensive strategy to address the homelessness of older women. This should include setting clear targets and initiatives to be developed in consultation with older women and their representative organisations;
- The funding for the development of two new affordable housing projects for older women (one in regional NSW) which ensure at least 50 new rental units are delivered;
- Making the private rental sector a viable long term option for older women, including removing the capacity for 'no cause' evictions in the Residential Tenancies Act 2010 (NSW);
- improving the way that the housing and homelessness service system responds to and supports homeless older women, including developing new products and services that target this cohort;
- Development of a targeted, mixed equity model for older women;
- Securing the financial independence of holder women including through improved access to superannuation and other financial assets.

Women with a disability⁶

Women with disability are estimated to be 37.3% more at risk of domestic violence than their peers.⁷ In NSW alone, 43% of the women who experienced personal violence in 2011 were estimated to have a disability or long-term health condition, 7% higher than the national average.⁸ In this way, this cohort are particularly vulnerable to homelessness and often require assistance in accessing appropriate, affordable housing.

⁵ *A Plan for Change: Homes for Older Women*, Published by Homelessness NSW on behalf of the Older Women's Housing and Homelessness Group, accessed October 2016,

<http://www.homelessnessnsw.org.au/images/stories/documents/Older_Women_Booklet_Web_Version.pdf>

⁶ Women With Disability and Domestic and Family Violence:

A Guide For Policy and Practice, People with Disability Australia and DVNSW, 2015

⁷ ABS (Australian Bureau of Statistics), 2012. '4430.0 – Disability, Ageing and Carers, Australia: Summary of Findings, 2012', Australian Bureau of Statistics. <<http://www.abs.gov.au/ausstats/abs@.nsf/Latestproducts/A813E50F4C45A338CA257C21000E4F36?opendocument>>

⁸ Family and Community Services, 2014. 'Women in NSW 2014', NSW Government. <http://www.women.nsw.gov.au/_data/assets/file/0019/300772/3303_WNSW-Report2014_web.pdf>

Women with disability experience domestic and family violence in a range of ways. However, the issues of power and control, as seen in domestic and family violence perpetrated against other women, are also present in domestic and family violence against women with disability. Some of the unique forms of domestic and family violence against women with disability, in addition to more familiar forms of domestic and family violence, include:

- Physical Violence, such as the withholding of food, water, medication or support services, misusing medication as a restraint, using physical restraints and destroying or withholding disability-related equipment.⁹
- Sexual Violence, such as inappropriate touching during care giving, taking control of reproductive processes and demanding sexual activities.
- Emotional Violence, such as verbal abuse, forced isolation, denying or trivialising the disability, humiliating the individual, threatening violence, institutionalisation or the withdrawal of care, and threatening to hurt guide dogs, pets or other family members.¹⁰
- Financial Violence, such as stealing or taking control of money, taking control of investments and refusing to pay for essential medication or disability-related equipment. Particular forms of coercion and manipulation that result from existing hierarchies between people with disability and people without disability, such as individuals being led to believe that all relationships function in this way.

Considering these often hidden ways women with a disability experience DFV it is pertinent to make sure that IPART takes into consideration the experiences of victim survivor women with a disability who require social and affordable housing and subsequently consider how changes would impact upon this high risk cohort. This is in particular reference to the income based modelling which proposes counting some tax benefits as assessable income, an approach DVNSW does not support (see Questions 20 – 24).

CALD Women experiencing DFV

CALD women who are victim-survivors of DFV are incredibly vulnerable. In addition to the trauma resulting from domestic and family violence, women in this situation are often experiencing substantial distress due to language and cultural barriers, social isolation and, for some families, the impacts of post-traumatic stress disorder from events experienced in their country of origin. There are fears of police, government institutions and authorities, often the perpetrator has threatened that if they seek help they will be deported and that no-one will believe them. There are a number of challenges associated with finding a support service that understands the complexities of their experience and can assist. Finding appropriate accommodation is difficult for all women experiencing DFV – let alone for women where cultural and language barriers exist.

Due to the complex immigration and human services systems, often migrant women who flee violent relationships are left without an ability to access an income. This cohort therefore rely heavily on the domestic and family violence (and the homelessness) sector for support in NSW. The particular circumstances of these families results in long stays in homelessness and domestic and family violence support accommodation with no exit options, which also prevents entry of new families to that service. Access to safe

⁹ Frohmader, C. 2007b. 'It's not ok, it's violence: information about domestic violence and women with disabilities', Women with Disabilities Australia. <http://wwda.org.au/wp-content/uploads/2013/12/Its_Not_OK_Its_Violence.pdf>

¹⁰ Frohmader, C. 2007b:8

accommodation is a major challenge for this cohort of families. Information is limited around what support programs are available, and already overstretched services often struggle to navigate the system.

DVNSW recommends:

- That IPART focus on the provision of affordable housing for those on very low and low incomes and who are particularly vulnerable to becoming homeless, rather than an untenable narrowing of the assessment criteria for social housing.
- That IPART review and implement all relevant recommendations from *A Plan for Change: Homes for Older Women* and specifically take into consideration the unique experiences of DFV by this cohort and their specific social and affordable housing needs.
- That vulnerable and marginalised groups such as women with disability, CALD women and older women be considered in any priority of need.

Question 6: What alternative assistance would be most effective for those applicants for social housing who meet the income threshold but do not have priority need for housing?

Housing stock needs to be used and assigned in the most efficient way possible. Currently, there is a mismatch between the housing stock and tenant need. Roughly half of all social housing applicants are single adults whereas the majority of housing stock is geared towards the needs of families. Housing NSW has estimated that under-utilisation of properties in NSW equates to a rent loss of about \$25m per annum. This is the equivalent to the recurrent cost to government of providing public housing for about 3000 households. This would need to be rigorously evaluated by a panel of experts from non-governmental organisations and government organisations.

In addition, the criteria for people being encouraged into shared housing also needs to be reconsidered. This model of housing is often not suitable to victim-survivors of DFV - particularly if they have children or disability.

DVNSW recommends:

- that a panel of experts be established and comprised of representatives from peak bodies and social and affordable housing academics to oversee alternative models and to take urgent action on how to best increase housing stock and ensure appropriate housing is allocated.
- Evaluation of income threshold for eligibility for public housing lease renewal set at a rate that is in line with the median rent in that area.

Questions 7 & 8: Should people receiving housing assistance have their eligibility for assistance reviewed as their circumstances change? What are appropriate transfer policy settings that take into account the principles of equity, and costs of transfers as well as the benefits?

DVNSW would advocate for the trial and evaluation of a voluntary system whereby those whose circumstances have changed are asked whether they might be willing to move into property more appropriate to their current circumstances and needs. The safety of a woman and her children who are victim-survivors of DFV must remain the priority. A nuanced understanding of the complexities of

DFV is required by anyone making decisions regarding transfer of tenants. DVNSW recommends on-going trauma training for staff reviewing individual cases and making any decisions relating to the reassessment, especially where vulnerable tenants are concerned. There have been incidences, for example, of victims of sexual assault being moved into apartment buildings also housing their perpetrator.

DVNSW recommends:

- Transfers relating to tenants who are victim-survivors of DFV must ensure tenant choice and must only occur following a strong risk and safety assessment.

Question 20 -24: If an income-based rent model is retained, should the percentage of household income used to calculate social housing rent be changed? Should currently exempt income supplements be included in assessable household income? Should income from work be assessed on an after-tax basis? If an income-based rent model is retained, what other possible improvements to the current rental model should we assess?

To be considered affordable, rent should be no higher than 30% of gross income. The current rate of 25% of an individual's assessable income or the market rent, whichever is lower, is fair and acceptable to us.

DVNSW does not advise that currently excluded income supplements should be included in assessable household income. Most income supplements are given to address a specific disadvantage and are, in theory, calculated to be an amount that addresses that disadvantage. Taking away a percentage of a supplementary payment makes it inadequate to address the need it is intended to.

DVNSW recommends affordability modelling to understand the impact of removing concessions such as Family Tax Benefits Part A, B and the income of other members of the household. Allowances that are provided to people such as those with a disability, carers and foster carers, are given for specific reasons and therefore should not be included as assessable income. DVNSW supports the opinion that the approach proposed does not mitigate the risk of further disadvantaging those it claims to try and help.

DVNSW therefore advocates for income from work being assessed on an after-tax basis. This would be the most equitable way of calculating rent, as it is effectively an individual's net income that makes up their disposable income. This would also put the public housing sector on the same terms as the private rental sector. When private renters make a decision about what it is they can afford to spend on rent costs, they make this decision based on their net income, the money that is readily and immediately available to them.

DVNSW strongly advocates for the model used by Address Housing, and supports the Address Housing submission and any recommendations made to IPART.

DVNSW recommends:

- Affordability modelling is to understand the impact of removing concessions such as Family Tax Benefits Part A, B and the income of other members of the household. Allowances that are provided to people such as those with a disability, carers and foster carers, are given for specific reasons and therefore should not be included as assessable income. DVNSW supports the opinion that the approach proposed does not mitigate the risk of further disadvantaging those it claims to try and help.
- That the Address Housing's new rental model be evaluated after the initial client's tenure

period has been completed (5 years) and that subsequent learning's shape how we approach providing social and affordable housing to those leaving DFV.

DVNSW also implores IPART to pressure the NSW Government to treat the extension of the National Partnership Agreement on Homelessness as a matter of urgency and pursue it immediately with the Commonwealth Government. The loss of any funding to the homelessness sector would be extremely harmful to those at risk of, and experiencing, homelessness.

In addition, DVNSW has significant concerns relating to the NSW Government plans to rewind introducing tenancy bonds for new public housing tenancies. If this recommendation and its underpinning principles are ignored at the very least an exemption is provided for those escaping domestic and family violence.

DVNSW also recommends that there is a commitment to support and facilitate the integration of victim's voices to the *IPART review*.

Conclusion

DVNSW note that the themes within the discussion paper are a culmination of 40 years and more of knowledge, expertise and learning's of failures to properly resource and adequately support the intersectionality between domestic and family violence, homelessness and social and affordable housing.

DVNSW is optimistic that this is an opportunity that could fundamentally shift our responses for those at risk of, and currently experiencing domestic and family violence, and ensure they do not ever have to experience homelessness or housing stress on top of the life altering trauma associated with domestic and family violence.

Exploring any proposed changes and their potential impact upon women, children and young people who have escaped domestic violence is crucial for the rental reviews success. No one should be further disadvantaged because of any changes, particularly when we know the importance of trauma recovery and housing stability for successful outcomes for all cohorts affected by DFV.

DVNSW realises there have been some complex recommendations put forward as a response to this discussion paper but DVNSW are committed to working alongside Government Departments, NGO's, specialist domestic and family violence services, the private sector as well as those who have or are experiencing domestic and family violence to make them a reality.

DVNSW looks forward to the ensuing conversations and changes as a result of the IPART review.