



Housing for the Aged Action Group submission to NSW Homelessness Strategy 2025 - 2035

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About Housing for the Aged Action Group

Housing for the Aged Action Group (HAAG) is a member-based, community organisation specialising in the housing needs of older people. The organisation has over 900 members across the country actively working towards achieving housing justice. Established over 40 years ago as a grassroots movement, the organisation has developed a robust service delivery arm in Victoria and has a strong presence in advocacy for older people experiencing housing and homelessness related issues across the country. HAAG leads the NSW Ageing on the Edge coalition, which includes nearly 170 member organisations and supporters.¹ Coalition members are advocates for change working together to address housing and homelessness related issues of older people in NSW, and includes people with lived experience, service providers, peak advocacy bodies and private sector organisations. The Coalition was originally convened as a reference group for the Ageing on the Edge project that launched a report in 2017, *The Older I Get the Scariest It Becomes – Older People at Risk of Homelessness in NSW*.²

HAAG welcomes the opportunity to provide input into the NSW Draft Homelessness Strategy 2025 – 2035. This submission is based on our experience delivering housing and related support services to older people, research and lived experiences of older people experiencing housing stress or homelessness. We especially acknowledge the contributions to this submission made by members of HAAG's advisory groups including NSW Lived Experience Action Group (LEAG), National Alliance of Seniors for Housing (NASH), Retirement Accommodation Action Group (RAAG), LGBTQIA+ reference group and culturally and linguistically diverse (CALD) reference group. This submission will provide a general response to the consultation paper, as well as specific recommendations for implementation of the principles expressed in the paper.

¹ See further, Ageing on the Edge NSW Forum, accessible at: <https://www.older tenants.org.au/national-action/ageing-the-edge-nsw-forum>

² J. Fiedler and D. Faulkner, *The older I get the scariest it becomes: Older people at risk of homelessness in New South Wales*, 2017, accessible at: <https://www.older tenants.org.au/publications/the-older-i-get-the-scarier-it-becomes-report-older-people-risk-homelessness-new-south-wales>

Recommendations

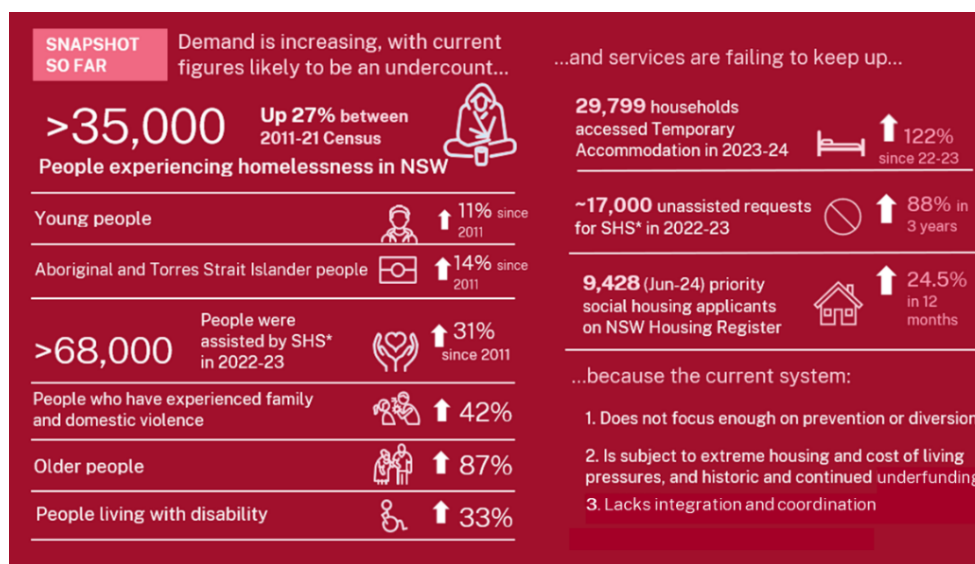
In consultation with our NSW Lived Experience Acton Group (LEAG), we make the following recommendations:

1. Fund a specialist older persons’ housing information and support service that comprises both an early intervention and crisis response, similar to the HAAG Home at Last model in Victoria.
2. Lower the priority age for social housing eligibility from 80 years as a matter of urgency.
3. Build 5,000 social homes per year for 10 years, 20% of which should be dedicated to older people.

Context

By the government's own calculations, the number of older people experiencing homelessness has risen by 87% between the 2011 and 2021 Census—far outpacing the 11% increase among young people (see Figure 1). This represents the most significant demographic increase in homelessness, yet service delivery has not adapted to meet this growing need. There is a clear gap in existing services, and the principle of ensuring mainstream policies and practices do not discriminate, create service gaps, or exclude those at risk of or experiencing homelessness must be applied to address the specific needs of older people.

Figure 1



HAAG also endorses the recommendations made in the Older Women's Network NSW's submission, and would like to draw attention particular to the following passage:

OWN notes that the Draft Strategy supports (as described on page 7) an integrated approach to homelessness. Figure 4 of the draft illustrates the number of Government strategies, including the NSW Women's Strategy and the NSW Seniors Strategy, both of which include reference to housing, but are either conditional (eg only women with dependent children), are unfunded, or refer to Commonwealth responsibilities. As such, older women appear to be hidden and invisible in this Draft Strategy. Specific action plans for older women can identify early and cost-effective intervention measures. Without a specific strategy which highlights the need of older adults, and older women in particular, we will continue to see a rise in the statistics of older women forced to live in cars, emergency housing and corresponding rise in the demands on emergency and other health services (Page 3).

Across NSW, homelessness is becoming an increasingly prevalent issue for older people. There are a number of reasons for this, including: an ageing population; a lack of social and affordable housing; increasingly tight housing markets and a larger number of people reaching retirement with mortgages; age discrimination in the workplace; low superannuation balances; and inadequate income support payments.³

This situation is compounded for older women as a result of the gender pay gap in pre-retirement and retirement incomes and savings, women's overall disadvantaged economic position and the immediate and long-term financial impact of domestic and family violence, taking time out of the workforce for care responsibilities and the longer lifespan of women compared to men.⁴

According to census data, the proportion of older people in private rental properties jumped significantly in NSW (137,529 in 2011 to 239,937 in 2021) reflecting a 74.5% increase in a decade.⁵ Close to 120,000 of the older renters were in the lowest two income quintiles. It is important to note that the data was collected prior to rental crisis started and it is likely that the number of older people in severe rental stress, experiencing or at risk of homelessness is significantly higher.

³ D. Faulkner and J Fielder, The older I get the scarier it becomes: Older people at risk of homelessness in NSW, 2017, accessible at: <https://www.older tenants.org.au/publications/the-older-i-get-the-scarier-it-becomes-report-older-people-risk-homelessness-new-sout-0>

⁴ C. Cerise, Accumulating poverty? Women's experiences of inequality over the lifecycle: An issues paper examining the gender gap in retirement savings. Australian Human Rights Commission: Sydney, 2009, accessible at: https://humanrights.gov.au/sites/default/files/document/publication/accumulating_poverty.pdf

⁵ Housing for the Aged Action Group, Decades of Housing Decline: 2011 & 2021 Census Analysis, 2023, accessible at: https://www.older tenants.org.au/sites/default/files/decades_of_decline_-_nsw_census_data_insights.pdf

As of June 2023, there were 16,328 applicants over 55 on the social housing waiting list.⁶ This is the second highest number of applicants over 55 since 2012. From the service experience and sector understanding, it is evident that this number only represents the tip of the iceberg.

Single older women are amongst the most marginalised groups in terms of their access to safe, affordable housing that is located close to amenities and suitable for their needs.⁷ The NSW Homelessness Strategy states that between 2013-14 and 2016-17, NSW saw 88% growth in the number of women over the age of 55 years accessing homelessness services.⁸ The *At Risk: Understanding the population size and demographics of older women at risk of homelessness in Australia* report estimated that 110,000 women over 45 years were at risk of homelessness in NSW in 2018.⁹

Comments from the NSW Lived Experience Action Group

This submission is based on consultation specifically with HAAG's NSW Lived Experience Action Group (LEAG) group, a working group for older people living in NSW. While this group has informed this whole submission, we would like to specifically highlight the following feedback and statements made by the group:

- While the group supported the principles outlined in the draft strategy, they expressed pessimism about its implementation. They were concerned that phrases such as "*Housing is a human right*" and "*trauma-informed*" — while meaningful in theory—would not translate into tangible improvements in the everyday experiences of people facing homelessness without substantial financial investment, cultural change, and political will.
- One group member remarked, "*Housing is a human right for people you can see—for the rest of us, it's not.*" They added, "*Do I need to pitch my tent outside the Minister's office to get a call back or a place to stay? Because as long as I'm out on a farm, out of sight, I'm invisible.*"
- The group emphasized that if "*Housing is a human right*" is to serve as the foundation of this strategy, broader cultural attitudes towards housing must shift. In particular, they highlighted the burdensome and often unrealistic requirements for securing housing, such as providing extensive documentation within tight timeframes. One member shared their experience of

⁶ Department of Communities and Justice, Statistical Data Report 2021-22, accessible at: <https://public.tableau.com/app/profile/dcj.statistics/viz/ASR2022-23Peoplehaveasafeandaffordableplacetolive-page1/Housing-ApplicantsBar?publish=yes>

⁷ Homelessness NSW, Mercy Foundation, *et al*, A Plan for Change: Homes for Older Women, 2016, accessible at: <https://homelessnessnsw.org.au/wp-content/uploads/2021/03/Feb-2016-A-Plan-For-change-homes-for-older-women.pdf>

⁸ Department of Communities and Justice, NSW Homelessness Strategy 2018-2023, 2018, accessible at: <https://apo.org.au/sites/default/files/resource-files/2018-06/apo-nid178946.pdf>

⁹ Housing for the Aged Action Group, *At Risk: Understanding the population size and demographics of older women at risk of homelessness in Australia*, 2020, accessible at: https://www.olderrenters.org.au/sites/default/files/at_risk_final_report_web.pdf

living in a car, where storing the necessary paperwork was impossible. They noted that if they had been able to store anything beyond their immediate possessions, it would have been family photos.

- The group also stressed that housing must be suitable for the individual and their needs. Being homeless or experiencing housing stress should not mean having to accept any available option, regardless of whether it is appropriate or sustainable.

Service response to resolve this issue in NSW

Many older people who have had conventional housing histories and have not previously interacted with the social service system find it complicated and difficult to navigate. Stigma and shame are also barriers to older people knowing when and where to seek help.¹⁰ Social stereotypes of homelessness of street sleeping, alcohol and drug dependence and mental ill-health perpetuate profound stigma around experiences of homelessness and assumptions about what constitutes homelessness and the applicability of social supports. Older people at risk of or experiencing homelessness for the first time in their lives often fear isolation and estrangement from children and/or grandchildren, their friends and community.

Given the critical needs of certain cohorts, there are targeted Specialist Homelessness Services (SHS) for young people and women escaping domestic and family violence.¹¹ However, there is no specialised service for older people at risk of or experiencing homelessness in NSW.

Lack of appropriate early intervention and prevention for older people

Early intervention and preventative approaches are critical to reaching older people before they experience a housing crisis and avoiding the associated detrimental mental and physical health impacts of homelessness.¹² Early intervention and prevention policies have been found to be effective for older people and deliver long-term benefits for the Australian economy and society. This includes lower overall expenditure on government services.¹³

¹⁰ D. Faulkner and J Fielder, The older I get the scarier it becomes: Older people at risk of homelessness in NSW, 2017, accessible at: <https://www.older tenants.org.au/publications/the-older-i-get-the-scarier-it-becomes-report-older-people-risk-homelessness-new-sout-0>

¹¹ Ibid

¹² C. Thredgold, A. Beer, C. Zufferey, A. Peters, and A. Spinney, An effective homelessness services system for older Australians, Australian Housing and Urban Research Institute, 2019, accessible at: <https://www.ahuri.edu.au/research/final-reports/322>

¹³ Ibid

For older people renting on a low income, the connection between housing insecurity and broader feelings of personal insecurity are especially acute.¹⁴ Many older people at risk of or experiencing homelessness manage by living in unaffordable, substandard and insecure private rentals or seeking support from family and friends in what they hope to be a temporary arrangement whilst they are 'between homes'.¹⁵ They employ a range of precarious coping mechanisms, such as going without food, heating/cooling and medication.

A Productivity Commission report found that levels of awareness and knowledge regarding aged care and housing options are low among older people. As such, many older people at risk of or experiencing homelessness do not know when or where to turn for help.¹⁶

More effective provision of information is needed to support better housing decisions.¹⁷ Effective provision of information requires consideration of the stigma, shame and hidden nature of older people's experiences of homelessness. This means reaching people in their communities and providing information in a way that facilitates understanding of risk factors, housing and support options, recognising different cultural contexts and language requirements.

Older people who are not presenting at services and living in precarious housing are also likely to be living in extremely high rental stress. The Productivity Commission report noted that a quarter of low-income households spend over half their income on rent, and 7% spend over 75%.¹⁸ These people will benefit from accessing a service that can assist them navigate the housing system or finding alternative housing options that are affordable where possible.

In NSW, the design of existing services is based on an assumption that the person in need will present at an appropriate service either in-person or via a phone call. Increasing reliance on digital service delivery of human services is an additional barrier for many older people at risk of or experiencing homelessness, due to low levels of digital literacy and/or limited access to the internet, computer and mobile devices. For those who do use technology, the available information can be both overwhelming in terms of information about housing and aged care and underwhelming for older people seeking affordable housing for whom residential care remains a distant prospect.

¹⁴ E. Power, *Older women in the private rental sector: unaffordable, substandard and insecure housing*, Western Sydney University, 2018, accessible at: <https://doi.org/10.26183/5edf0f0d75cf8>

¹⁵ D. Faulkner and J Fielder, *The older I get the scarier it becomes: Older people at risk of homelessness in NSW*, 2017, accessible at: <https://www.older tenants.org.au/publications/the-older-i-get-the-scarier-it-becomes-report-older-people-risk-homelessness-new-sout-0>

¹⁶ Australian Association of Gerontology, *Background Paper. Older women experiencing, or at risk of, homelessness*, 2018, accessible at: <https://www.older tenants.org.au/content/australian-association-gerontology-position-paper-older-women-who-are-experiencing-or-risk>

¹⁷ Productivity Commission, *Housing Decisions of Older Australians*, Commission Research Paper, 2015, accessible at: <https://www.pc.gov.au/research/completed/housing-decisions-older-australians>

¹⁸ Productivity Commission, *Vulnerable Private Renters: Evidence and Options*, 2019, accessible at: <https://www.pc.gov.au/research/completed/renters>



For those who do present at homelessness services, options include short-term housing and tenancy supports. Temporary or meanwhile housing is not a viable option for older people at risk of and experiencing homelessness other than as an interim measure. Crisis-oriented homelessness services are operating with very limited capacity due to the current housing crisis and do not have sufficient resources to assist older people with social housing applications, which are complicated and involve the compilation of extensive documentation.

Service solution targeted to older people

The vast majority of these challenges could be resolved by a dedicated service that supports older people to plan for their housing future and identify appropriate housing options.

The Housing for the Aged Action Group (HAAG) *Home at Last* service model in Victoria demonstrates that better housing outcomes can be achieved for older people experiencing financial disadvantages. *Home at Last* provides accessible, equitable and appropriate support and housing information for older people who are experiencing homelessness or at risk of homelessness. Services range from providing tailored housing information to assistance with housing applications, support during the move, establishing a new home and referrals into aged care and other supports. A key component of the service is its focus on early intervention. This occurs through engagement with communities directly and also through peer educators who are able to reach people at risk of homelessness before they get to a crisis point.

An Ernst & Young Cost Benefit Analysis (CBA) found that *Home at Last* has a benefit cost ratio of 2.3.¹⁹ This means that every dollar spent on the *Home at Last* housing information and support service generates at least \$2.30 in societal value.

The CBA assessed the impact of *Home at Last* on the economic welfare of older people relative to a base case scenario. For simplicity, the economic benefits of the service have been grouped into two key categories relating to how outcomes are realised: improved wellbeing benefits accruing to individuals and avoided costs realised by Government. There are also a number of benefits that are likely to exist but were not quantified in this analysis.

¹⁹ Ernst and Young, Home at Last Economic Appraisal, November 2019, accessible at: https://www.older tenants.org.au/sites/default/files/home_at_last_economic_appraisal_-_final_report_-_november_2021.pdf



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Home at Last service – Cost Benefit Analysis Results



The non-quantified benefits include increased referrals to *Home at Last*, increased community connections to respective groups (CALD and LGBTIQ+), reduction in reliance on multiple community services and increased reliance on government services, clients receiving the services they need as a result of improved referrals to other social services and increased contribution of clients to their community via volunteering.²⁰

In 2023, a business case for adopting *Home at Last* service in NSW was developed. The Business Case Report outlined how the gaps in housing services for older people can be filled by establishing a service providing specialist housing information and support.²¹ The pilot was costed at \$5.6million over three years.²²

²⁰ Ibid

²¹ Fran Grant Consulting, Business Case for Specialist Housing Information & Support Service for People 55+ in NSW, 2023, accessible at: <https://www.older tenants.org.au/publications/business-case-for-specialist-housing-information-support-service-for-people-55-in-nsw>

²² It is important to note that the staffing and other costs were based on salary ranges in 2022-23 financial year.

Given the success of the service in assisting older people to navigate the complex housing system with a significant saving to the government, the *Home at Last* model should be funded in NSW and adapted for the local context and service system.

Recommendation

1. **Fund a specialist older persons' housing information and support service that comprises both an early intervention and crisis response, similar to the HAAG *Home at Last* model in Victoria.**

Social housing eligibility criteria

In NSW, people who have met general eligibility criteria for social housing may be approved for housing assistance as an elderly client if they are:

- aged 80 years and over, or
- confirmed to be an Aboriginal or Torres Strait Islander person and aged 55 years and over.²³

The Department of Communities and Justice advises that 'priority social housing eligibility recognises that there are some people whose need for social housing is especially acute.'²⁴ In Victoria, a special category is available for people aged 55 years and over who are eligible for social housing and are not eligible for another priority category.²⁵

These challenges are even more complicated by the lack of a clear definition for older people in NSW. The NSW Government does not use a single definition of older people, recognising age-related need manifests in different ways in different contexts.²⁶

Given the rising number of older people, particularly older women in social housing lists in acute need, it is clear that eligibility age should be lowered from 80 years as a matter of urgency to provide older people with access to priority housing.

Recommendation

²³ Department of Communities and Justice, Social Housing Eligibility and Allocations Policy Supplement, accessible at: <https://www.facs.nsw.gov.au/housing/policies/social-housing-eligibility-allocations-policy-supplement/chapters/entitlements>

²⁴ NSW Budget Estimates, 29 November 2021, accessible at: <https://www.parliament.nsw.gov.au/lcdocs/other/16386/Answers%20to%20supp%20questions%20-%20The%20Hon.%20Alister%20Henskens%20MP%20-%20Received%2025%20Nov%2021.pdf>

²⁵ Housing Victoria, Social housing eligibility, accessible at: <https://www.housing.vic.gov.au/social-housing-eligibility>

²⁶ NSW Budget Estimates, 29 November 2021, accessible at: <https://www.parliament.nsw.gov.au/lcdocs/other/16386/Answers%20to%20supp%20questions%20-%20The%20Hon.%20Alister%20Henskens%20MP%20-%20Received%2025%20Nov%2021.pdf>



- 2. Lower the priority age for social housing eligibility from 80 years as a matter of urgency.**

Increasing public and community housing supply

Housing is the key expense for many low-income households and NSW, as discussed, is one of the most unaffordable states in Australia. We are encouraged by the Government's attempts to address housing and homelessness issues in NSW including the creation of Homes NSW, openness to change rental laws meaningfully and address some of the planning issues.

Although these are encouraging developments, they are inadequate to address the significant and increasing demand for public and community housing in NSW. The community sector has been calling on the government to invest in an additional 5,000 new social housing dwellings every year for the next 10 years.²⁷ Considering the growing older population, particularly the number of older people who do not own their own home, at least 20% of the new social and affordable housing must be earmarked for older people at risk of or experiencing homelessness.

Recommendation

- 3. Build 5,000 social homes per year for 10 years, 20% of which should be dedicated to older people.**

²⁷ NCOSS, Cost of Living/COVID-19 Supplementary Paper: Recommendations to the NSW Government, 2020, accessible at: https://www.ncoss.org.au/wp-content/uploads/2020/04/23042020_CoLCOVID19_SupplementaryPaper-ONLINE_0.pdf