



Impact of the Workplace Relations Amendment Act 2005 on people working in the ACT and the impact on their families.

Submission to

**The ACT Legislative Assembly Select Committee on Working Families in the ACT
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ABOUT ACT SHELTER

ACT Shelter is an independent peak community organisation funded by the ACT Government to provide strategic advice and advocacy to assist people on low to moderate incomes on housing issues. This includes people who are homeless or who are at risk of homelessness.

Our role is to provide an informed voice on housing policy issues based on research and close collaboration and consultation with housing consumers and community based organisations working on housing and related issues.

We promote housing options for people on low incomes, including social housing (public housing and community housing), affordable housing provided through the private sector, and affordable home ownership.

ACT Shelter is a member based organisation with over 100 members including individuals and organisations who have an interest in ensuring the availability of affordable, secure and appropriate housing in Canberra. Many are actively involved in the provision of housing support and services.

We hold regular forums and special meetings on housing issues of concern to people in the ACT and we encourage community participation in identifying important issues.

ACT Shelter disseminates information through its newsletter, website and forums, and develops networks of people with common interests in housing issues. We have a strong brief to work with people experiencing particular disadvantage in the housing market, such as women, young people, those with a disability or mental illness, Aboriginal and Torres Strait Islander people and those from culturally diverse backgrounds.

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BACKGROUND

In making this submission to the ACT Legislative Assembly Select Committee on Working Families, ACT Shelter is reiterating evidence outlined in its submission to the ACT Government's 2007-2008 Budget consultation process.

The lack of affordable housing in Canberra is disproportionately affecting low income and potentially vulnerable residents of the ACT and the ability of employers to reduce wages and conditions, made possible by the Workplace Relations Amendment Act 2005 (Work Choices) will only serve to exacerbate this situation.

In the Select Committee's Interim Report in March 2006, it is noted that much of the evidence-based research points to the fact that it is the low paid who were particularly adversely affected when similar legislation was passed in New Zealand and Victoria¹. In order to prevent a similar occurrence happening in the ACT, ACTCOSS, in its submission to the inquiry called for more affordable housing to be provided².

ACT Shelter not only requests that more affordable housing be provided by the ACT Government, but that the Government implement a number of measures that will assist the low paid and members of the community who are more likely to be disadvantaged as a result of the WorkChoices legislation, to make their home secure and adequate for their needs.

These steps are becoming critical as the housing related effects being felt are becoming more serious and widespread as the ACT rental market further tightens and we see people already struggling with low wages being faced by excessive rent increases or threats of eviction and fears of trying to re-enter the market.

The recommendations below are made following consultations over the past year with our members, both service providers and individual members of the community.

¹ P43-44 Interim Report

² p23 Interim Report

SUMMARY OF RECOMMENDATIONS

Housing ACT Resources

That the Government set a minimum target for public housing to continue to comprise at least 9% of the ACT's total housing stock, and for it to be resourced accordingly.

That if the Government's stated aim of selling 500 public housing dwellings and replacing them with new stock is still to be pursued, resources be allocated for greater data collection, analysis and consultation around this.

Security of Tenure

That the policy of security of tenure for public housing tenants be retained.

That consideration be given to setting a minimum target for rent receipts in order to strengthen the financial sustainability of Housing ACT, and that to this end further consideration be given to encouraging a diversity of rebated and market renters.

Energy Efficiency

That the WEST energy trial be renewed as an ongoing program until at least 2008.

That a report be released on the outcomes of the program for refitting public housing properties for energy efficiency, and that if the conclusions are positive, this be continued as an ongoing program.

That particular efforts be made to ensure that public housing properties where tenants are to be charged for water consumption be brought up to adequate levels of water efficiency.

That if public housing tenants are to be charged for water usage, the possibility of charging only for excess use be considered.

Supply of Affordable Private Rental Housing

That the practice of rent auctions be eliminated in the ACT.

That further investigation occur into the possibilities of introducing penalties for landlord breaches of the RTA, to serve as a disincentive.

That ACT taxes are altered and appropriate subsidies implemented to provide better incentives for the development of affordable housing.

That the ACT's planning, development assessment and building regulation systems are reviewed to provide greater emphasis on enabling the construction and retention of affordable housing. This should involve a strong focus on affordable housing for people on low and very low incomes.

That all new developments include a mandatory proportion of affordable housing, or contribute an equivalent amount to an ACT Affordable Housing Fund. This should occur with reference to the ACT Government's Affordable Housing Taskforce report recommendation that this proportion begin at least 3-4%.

Defining Affordability

That the ACT Government develop affordability benchmarks based on after-housing income levels, to inform housing policy.

That the ACT Government commission research into current and projected unmet need for affordable housing, with the aim of developing evidence-based policies locally and at a national level.

That any affordable housing initiatives include an evaluation framework to assess their economic and social impacts.

SAAP and Homelessness

That the Government continue to lobby the Commonwealth for increased funding for SAAP services, with highest priority given to areas of unmet demand and sector viability.

That the SAAP sector be adequately resourced to support people with high and complex needs.

That the Government commit resources to ensuring adequate long term exit options are made available for people exiting SAAP.

That the Government release a full overview of the cuts made to SAAP services following the June 2006 budget, including a breakdown of where funding has been reduced and where equivalent support for clients is now provided.

That adequate resources be made available for independent sector development services for the SAAP sector.

That any policies of resourcing informal support networks for people in homelessness (eg 'couch surfing') be accompanied by consultation and policy development, focusing on issues of regulation, eligibility and funding.

Home Ownership and House Repossessions

That the ACT Government lobby the Commonwealth for stronger national regulation of mortgage and finance brokers and non-bank lenders, with the aim of providing greater consumer protection.

That law reform be investigated to provide greater protection for consumers in relation to the conduct of mortgage and finance brokers.

That law reform be investigated to require lenders to carry out a reasonable assessment of a borrower's capacity to repay their loan.

Housing and Disability

That the Government develop mechanisms for ensuring that the disability-accessible housing introduced under Variation 229 of the Territory Plan be made affordable for a range of income groups.

That Housing ACT ensure that modified Housing ACT stock is used effectively to meet the needs of people with a disability.

That the possibility of providing greater support for families who wish to modify their houses for the needs of a family member who has acquired a disability be investigated.

That there be a register of accessible accommodation in the private rental market.

That there be greater statistical analysis of relationships between disability and poverty in the ACT, including rates of access by people with a disability to housing and homelessness services.

Indigenous Housing

That greater coordination occur between the Commonwealth, ACT and NSW Governments, public housing bodies and the community sector to ensure a coordinated approach to Indigenous housing need in the region.

That research be conducted into the impact of the changes to SAAP resourcing on Indigenous clients, with a particular focus on quality of care and adequacy of ongoing support to clients who have transitioned into housing.

That Housing ACT staff receive ongoing training in culturally appropriate approaches to housing, including in Indigenous understandings of safety, security and adequacy of housing.

That Indigenous housing organisations be adequately resourced to meet the demand for their services.

Housing Young People

That the actions identified under the Youth Homelessness Action Plan be implemented, particularly additional training for Housing ACT workers in dealing effectively with young people, and the allocation of an additional appropriate stairwell within a Housing ACT complex for young people.

That a second youth “boarding house” or long term affordable accommodation be established in line with the evaluation and recommendations of Lowana House.

That resources be allocated to providing greater training for youth workers to enable them to better assist young people in accessing and maintaining tenancies.

Students

That the ACT Government investigate the merits and potential of providing a low-cost, temporary hosting area, in recognition of the particular strains experienced by some students new to Canberra.

That any incentives offered by Government to universities and developers to provide affordable student accommodation should employ clear definitions of affordability developed in consultation with the community sector and student advocates.

Women and Housing

That a gender analysis inform the development of Housing ACT policy and practice, and the development of indicators of poverty and housing stress.

That the priorities of the ACT Women's Plan (2004) be taken into account in the formation of housing policy, particularly with respect to the importance of adequate housing and security of tenure for women and girls.

Mental Health

That adequate mental health / dual diagnosis training be provided for Housing ACT and SAAP / YSAAP workers.

That greater transitional support be provided for mental health consumers before, during and after being allocated public housing.

That research be conducted into the impact of shopfront closures and new outreach support on mental health consumers, to evaluate this strategy.

CALD and Refugee Housing

That the Government give consideration to funding a transitional housing facility for newly arrived refugees.

That further consideration be given to techniques for addressing discrimination in the private rental market.

That ACT Housing undertake further research and consultation with relevant communities and organisations regarding the housing needs of refugees, with a particular focus on how the new allocation system can best address these needs.

That research be conducted into the impact of shopfront closures on people from CALD backgrounds. Where necessary, alternative strategies should be developed for assisting CALD consumers, including culturally appropriate training for outreach workers.

That greater resources be committed to providing qualitative, quantitative and gender-disaggregated data into unmet need for adequate housing amongst new arrivals in the ACT.

SUPPLY OF PUBLIC HOUSING

Housing ACT Resources

A strong, sustainable public housing system is vital to the future development of the ACT. Public housing continues to provide far greater affordability and security for low income households than what is currently available in the private sector, and for many tenants, sustaining a public housing tenancy helps form the basis of a healthier, more stable and successful life. It is also noteworthy that support services right across the community sector consistently nominate increased public housing stock as a key area of need.

ACT Shelter commends the undertaking given by the Government in the June 2006 budget to increase funding to Housing ACT stock by \$10m per year over three years. This represents a significant and much-needed injection of funds and should help to reduce housing stress in the ACT. We note, however, that only \$12m of this represents new funding, with the rest promised via departmental efficiencies. The question of how an expanded public housing system can be adequately administered in the face of such cuts continues to attract community sector concern.

Shelter would contend that significant ongoing support will also be needed to guarantee a sustainable future for public housing. While population growth is difficult to predict precisely, the Canberra Spatial Plan identified a projected demand for an additional 58, 000 to 90, 000 new dwellings in the ACT over the next thirty years.³ Given ongoing problems of affordability in Canberra and the length of the Housing ACT waiting list, it does not seem unreasonable to expect the public housing sector to keep pace with the city's growth. It is therefore recommended that Government set a minimum target for public housing to continue to comprise at least 9% of the ACT's total housing stock, and for it to be resourced accordingly.

Somewhat startling was the brief comment made in the ACT Government's June 2006 budget that the Government would 'seek the sale of 500 dwellings, with the proceeds to be reinvested into new stock'.⁴ As yet, there seems to be very little information available about the details, timelines or process of this. There are certainly arguments in favour of adjusting the style of public housing stock to better meet demand, but it is impossible for proper discussions to occur around this significant suggestion without more information. If such a course is to be pursued, more data will be needed concerning which properties may be affected, how tenants will be involved in the process, how tenants will be housed in the interim period, and when and where properties will be replaced. Further community consultation will be vital here.

Recommendations

That the Government set a minimum target for public housing to continue to comprise at least 9% of the ACT's total housing stock, and for it to be resourced accordingly.

That if the Government's stated aim of selling 500 public housing dwellings and replacing them with new stock is still to be pursued, resources be allocated for greater data collection, analysis and consultation around this.

³ ACT Land and Planning Authority, *The Canberra Spatial Plan*, 2004, p.36

⁴ ACT Government Budget June 2006, *For the future: economic and financial outlook for the ACT*, p.27

Eligibility and Allocation

One element of the June 2006 budget ACT Shelter found particularly worrying was the increased tightening of eligibility for public housing, with entry to the waiting list now restricted to people residing in the ACT and earning up to \$504 (gross) per week for singles and \$630 for couples. It was particularly concerning that these restrictions were applied retrospectively to people already accepted to the list, as well as new applicants. Shelter notes with great concern that these income restrictions effectively require people in housing stress to remain unemployed or on very low incomes, and would urge that the limits be reconsidered. If such targeting is maintained, the question remains of what initiatives will be introduced to measure and address the needs of people who will now fall into an 'in between' category – too poor for the private rental market, not poor enough for the public housing system.

Another notable change over the past year has been the reshaping of the public housing waiting list, notably the creation of a new Priority category, limited to 150 applicants, targeting people with very high and complex needs and aiming to house them within three months. In many ways this new category may simply serve to formalise and clarify the existing Out of Turn allocation system. However, the question remains of how many applicants previously placed on the EAC1 list (defined as being functionally homeless or in severe housing need) will now be placed in the priority category.

Shelter would continue to express concern at the long-term implications of highly intensive targeting of the public housing system, both for the wellbeing of low-income households and of the public housing system as a whole. The question remains as to how such a targeted system (where there is some indication that even being in a SAAP homeless service does not qualify one automatically for the Priority category) can be said to be *preventing* homelessness. The decision to limit the Priority category to 150 applicants also seems curious, given that the number of people in high need may be potentially much greater.

Also concerning has been the decision to restrict eligibility for the public housing waiting list to people residing in the ACT for at least 6 months. A number of SAAP services have reported anecdotally that they take high numbers of requests from people currently residing outside Canberra. This raises concerns about whether residential requirements will mean longer periods in SAAP services for many people. (This is particularly worrying given the new emphasis on cost-cutting from SAAP services and encouraging quicker pathways through SAAP.) There is also anecdotal evidence that some people with work, study or family commitments in the ACT are forced out to places like Queanbeyan by Canberra's expensive private rental market. Once again, this seems to be a development which directly contradicts the principles of prevention and early intervention.

Security of Tenure

Shelter noted with disappointment and concern the suggestion accompanying the June 2006 budget that the policy of security of tenure be reconsidered for public housing tenants paying market rent for more than three years. Such a removal of security could have severe consequences for both the well being of low income people and the long term health of the ACT public housing system.

The value of Canberra's policy of security of tenure has been frequently acknowledged. In the 2004 DHCS Report, *Review of Housing ACT Market Renters*, market renters were found to contribute about 40% of the total rent collected by Housing ACT, despite comprising only about half this percentage of tenants. This report identified market renters as crucial to the long term financial and social sustainability of public housing, commenting:

market renters play an important role in the viability and sustainability of Housing ACT, both as an income source to help pay for services the organisation provides, and as an important contributor to the broader role of public housing being more representative of the community, and helping to sustain tenancies.⁵

The Consumer Forum held to inform the February 2006 Ministerial Housing Summit observed strong support for the policy amongst tenants. Security of tenure was also identified as a priority area by the 2004 ACT Women's Plan.⁶

Removing the principle of security of tenure would constitute a definitive movement away from a public housing model and towards a model of temporary, transitional 'welfare housing'. Lack of security has been identified by housing advocacy bodies in other states as encouraging tenants not so much to leave public housing, but rather to keep their incomes low or remain unemployed. (For those on fixed term tenancies, short-term casual employment towards the beginning of a tenancy might be an option, in contrast to a more settled and probably better-paid career.)⁷ Lack of secure tenure for public housing tenants was also nominated as an area of concern by the UN Special Rapporteur on Adequate Housing, Miloon Kothari, during his recent Australian visit.

While some public housing tenants choose to leave their properties voluntarily when their incomes increase, it must be acknowledged that there are others who strongly desire to stay because of a wish to remain in their established homes and neighbourhoods and / or because they still face considerable obstacles in the private market. Such difficulties can encompass affordability, accessibility, discrimination, changes in household composition, and uncertain financial prospects.

Shelter would warn of the social and financial dangers of limiting public housing only to people in the most desperate circumstances. Foregoing the revenue brought in by market

⁵ Department of Disability, Housing and Community Services, *Review of Housing ACT Market Renters*, August 2004, p.6, also pp.27, 37, 43

⁶ ACT Women's Plan, 2004, pp.8-9; Consumer forum Report to ACT Ministerial Housing Summit, February 2006; Key Messages from ACT Ministerial Housing Consumer Forum and ACT Ministerial Housing Summit, pp.4-5

⁷ See for example, Shelter WA, *Financial Workforce Disincentives in Public Housing*, Occasional Paper, October 2005

rents would pose additional costs to the public housing sector. More importantly, encouraging a public housing system where tenancies are short and characterized by low incomes would serve to ghettoise the public housing system – a sad outcome for the ACT, in particular where public housing has such a fundamental historical role in encouraging social mix and wellbeing.

Recommendations

That the policy of security of tenure for public housing tenants be retained.

That consideration be given to setting a minimum target for rent receipts in order to strengthen the financial sustainability of Housing ACT, and that to this end further consideration be given to encouraging a diversity of rebated and market renters.

PUBLIC HOUSING MANAGEMENT

Energy Efficiency

Inefficient and excessive use of energy and water remains a problem, particularly for low income families, where energy bills can constitute a significant drain on household finances and sometimes lead to considerable debts. Canberra's climate and aging public housing stock make this a particularly important issue for the territory.

Shelter commends the Government's piloting of the WEST energy trial in 2005, which had very positive results for the participating households - 90% of participants reported high levels of satisfaction and 100% thought the trial should become an ongoing program. Reduction in energy consumption for participating households averaged between 20-25%.⁸ We would encourage that this effective program be renewed through to 2008.

However, WEST is quite a narrow, targeted program; broader action will also be needed to address the fact that much public housing stock still has a poor energy rating, leading to high greenhouse emissions and large bills. Shelter commends the spending of \$1m on conducting an energy refit in Housing ACT properties but notes the Conservation Council's estimation that the total commitment needed to bring all HACT properties up to an adequate standard of energy efficiency may be more like \$33m. (This would cover refitting of 11, 000 properties at estimated \$3000 per property, which includes insulation, pelmets, curtains, sealing cracks and water efficiency.) Shelter would therefore request that a report of the outcomes of the initial refitting program be released, and if the conclusions are positive, a further ongoing commitment made to expanding the program.

The importance of making public housing stock water-efficient is particularly notable since the last budget where plans were announced to charge public housing tenants for water usage. The Tenants' Union has noted that charging tenants for water consumption in situations where the landlord has failed to adequately maintain or repair plumbing can be both a source of tension and a financial drain for the tenant. Water-efficiency is therefore particularly important. This may necessitate refitting (including fitting aerators, fixing leaky valves and installing water-efficient shower heads and dual flush toilets). If tenants are to be charged for water usage, consideration should also be given to charging only for excess usage, given that rent should cover regular water costs.

⁸ See YWCA of Canberra, in ACT Shelter, *Happenings in Housing*, issue 1, April 2005, pp.8-10

Recommendations

That the WEST energy trial be renewed as an ongoing program until at least 2008.

That a report be released on the outcomes of the program for refitting public housing properties for energy efficiency, and that if the conclusions are positive, this be continued as an ongoing program.

That particular efforts be made to ensure that public housing properties where tenants are to be charged for water consumption be brought up to adequate levels of water efficiency.

That if public housing tenants are to be charged for water usage, the possibility of charging only for excess use be considered.

SUPPLY OF AFFORDABLE PRIVATE RENTAL HOUSING

Living as a tenant in Canberra's private rental market remains difficult for many people on low (and even middle) incomes. The Real Estate Institute of Australia's report for the June 2006 quarter indicated that Canberra's median weekly rents were the highest in Australia for 3 bedroom houses (\$320 per week) and the equal highest (with Sydney) for 2 bedroom dwellings (\$300 p.w.). The vacancy rate for rental properties was low at 2%⁹

While there is a popular belief that expensive housing does not present a problem because Canberra is a well-off city without poverty, ACT Shelter would dispute this claim. In their 2006 national rental affordability bulletin, the Tenants' Union of Victoria used three widely accepted measures of housing affordability: housing costs as 25% or 30% of income, and the Henderson Poverty Line measuring levels of disposable income for different household types. They came to the stark conclusion that there were *no* private rental properties available in the ACT that would be affordable for a single person on Newstart, a sole parent on Parting Payment, a family on Newstart or a single person on minimum wage.¹⁰

Further to this, in June 2006, 2433 households were registered on the waiting list for public housing, some of whom had been waiting several years.¹¹ According to the ACT Government in 2005, around 48% of CRA recipients in Canberra are still paying more than 30% of their income in rent, compared to a national average of 35.5% of CRA recipients still in housing stress.¹² In the 2002 report by NATSEM, ACTCOSS and the ACT Government, *Addressing Disadvantage in the ACT*, it was estimated that 24, 446 (or 8.6%) Canberrans were living in poverty.¹³

⁹ Real Estate Institute of Australia, *Real Estate Market Facts*, June Quarter 2006, pp.8, 18

¹⁰ Tenants' Union of Victoria, *Rental Housing Affordability Bulletin: A National Perspective*, September 2006, pp.1-6

¹¹ ACT Department of Disability, Housing and Community Services, "Public Housing", <http://www.dhcs.act.gov.au> August 2006

¹² ACT Government, *Progress on Affordable Housing in the ACT: Report to the ACT Legislative Assembly*, Canberra, June 2005, p.29

¹³ ACT Government (with ACT Council of Social Services and the National Centre for Social and Economic Modeling), *Addressing Disadvantage in the ACT*, Canberra, 2003, p.9. Note: poverty was defined as existing where a household's income was below half the average person's equivalent disposable household income.

Serious concerns continue to be raised by tenants and their advocates about poor and / or unlawful practices by landlords and real estate agents. One of the most disturbing recent examples of this was the introduction of rent auctions. At a time of significant affordability problems (and intensive targeting of public housing only to the most needy) it is particularly important that greater protection be provided to private tenants.

The private housing market in its current form is clearly not delivering affordable housing to those most in need. Initiatives to encourage private market affordability for Australians on low-incomes have received comparatively little Commonwealth support. It is possible to compare, for example, the Commonwealth's relatively minor support for the CSHA and the (often ineffective) Commonwealth Rent Assistance with the considerable amounts of revenue foregone in taxation concessions to home-owners and owners of investment properties, as well as the First Home Owners' Grant.¹⁴ While Shelter recognises the limitations the ACT Government necessarily operates under, we would also emphasise how crucial it is for the ACT to demonstrate leadership and initiative in this climate. Here, a few key points can be made.

Firstly, given the complex and heterogeneous nature of the housing market, Shelter does not support initiatives which would simply deliver generalised benefits to the development industry (for example, a larger and cheaper supply of land) without tying this to specific affordability requirements. Any outlay or loss of revenue by Government should deliver clear, equivalent benefits to the public.

Possibilities for encouraging housing affordability range across a number of areas. It is important, for example, to consider possibilities for altering the ACT taxation system and introducing appropriate subsidies in place to provide better incentives for the development of affordable housing. Areas for consideration include stamp duty, land tax and change of use charge. (For more information on all of all of the possibilities discussed in this section, see ACT Shelter and ACTCOSS, *The Wealth of Home*, 2006.)

Planning is another crucial area for affordability initiatives, which should include reviewing current planning, development and building regulation systems to provide greater emphasis on retaining and encouraging affordable housing. One possibility involves requiring a proportion of affordable housing in new developments via inclusionary zoning models. Such initiatives may need to be accompanied by a review of existing legislation, to consider whether planning instruments need to be amended or replaced, and how any potential developer opposition can be negotiated.

Shelter notes that the Land Development Agency has accepted the recommendation of the *Standing Committee on Planning and Environment (Dec 2005)*:

That LDA require a percentage of multi-unit and greenfields developments to be constructed as affordable housing.¹⁵

To date, this has been evident in the LDA's development of the new suburb of Forde with Delfin Lend Lease-Canberra Investment Corporation, where an undertaking has been given to ensure 5% of the homes constructed are 'affordable moderate income housing'.

¹⁴ For more details, see ACTCOSS and ACT Shelter, *The Wealth of Home: A Call for Action on Affordable Housing in the ACT*, 2006, available at <http://www.actshelter.net.au>

¹⁵ Land Development Agency, *Annual Report 2005-2006*, Canberra, p.138

We also note the Government's recent calls for expressions of interest from the private sector to undertake projects to promote affordable housing, including in sites in Dunlop and Franklin.¹⁶ However, while such initiatives are welcome, it is important to note that so far they have focused on home ownership for moderate income households, without appearing to utilise a clear definition of affordability. Shelter would stress that initiatives to promote affordable housing through the planning system must focus on a diversity of incomes (including low and very low incomes). This in turn will presumably involve promoting affordable rental properties as well as (or instead of) sale ones. The development of clear understandings of what constitutes affordable housing is crucial here. Work will also be needed to ensure the affordable properties made available remain affordable in the long term (eg, beyond first sale or lease).

Shelter welcomes the ACT Government's recent decision to introduce a new Affordable Housing Steering Group, and anticipates that this group will utilise the substantial body of existing research, notably the work of the Affordable Housing Taskforce. It is to be hoped that this group's findings will result in clear, long-term affordability strategies, including timelines and targeted aims, with a strong focus on delivering affordability to low-income households.

Recommendations

That the practice of rent auctions be eliminated in the ACT.

That further investigation occur into the possibilities of introducing penalties for landlord breaches of the RTA, to serve as a disincentive.

That ACT taxes are altered and appropriate subsidies implemented to provide better incentives for the development of affordable housing.

That the ACT's planning, development assessment and building regulation systems are reviewed to provide greater emphasis on enabling the construction and retention of affordable housing. This should involve a strong focus on affordable housing for people on low and very low incomes.

That all new developments include a mandatory proportion of affordable housing, or contribute an equivalent amount to an ACT Affordable Housing Fund. This should occur with reference to the ACT Government's Affordable Housing Taskforce report recommendation that this proportion begin at least 3-4%.

DEFINING AFFORDABILITY

It is important that any initiatives developed to encourage greater housing affordability in the ACT include clear definitions of affordability and evaluative mechanisms to assess their social and economic impacts. There is, of course, no single exhaustive definition of affordability, and "adequate housing" contains a number of other components (eg security, safety). However, given the strain on affordable housing supply in Canberra, affordability remains a key area of importance.

¹⁶ For example, Simon Corbell, Media Release, '\$500M Joint Venture Project to Lift the Standard of Canberra's New Suburbs', 20 May 2005; *Hansard*, 28 June 2005, p.2363; Land Development Agency, *Annual Report 2005-2006*, Canberra, p.18; Jon Stanhope, Media Release, 'Innovative Affordable Housing Project Expression of Interest', 8 September 2006

It is probable that a number of affordability indicators will need to be developed to measure the impact of housing policies, but Shelter would contend that the concept of “after housing” income must be central. Stemming from the work of the ACT Affordable Housing Taskforce, this defines affordable housing as that which leaves households with sufficient income to meet other essential costs of living. This is, of course, difficult to collect data on, but, if developed, could serve as an important tool for analysing and evaluating the real cost of housing defined as “affordable” through other means. (One useful study in this area is Barry Duggan and Andrea Sharam, *Bleak House*,¹⁷ which examines the ‘rivalry’ and juggling between essential goods and services – eg rent, energy, food – in the lives of low-income Victorians.) For example, the real affordability of rents set at 74.9% of market rent can be questionable if the market rents in the area are very high, while the affordability of rents set at 30% of household income can be questionable if the income is very low to begin with.¹⁸

Recommendations

That the ACT Government develop affordability benchmarks based on after-housing income levels, to inform housing policy.

That the ACT Government commission research into current and projected unmet need for affordable housing, with the aim of developing evidence-based policies locally and at a national level.

That any affordable housing initiatives include an evaluation framework to assess their economic and social impacts.

SUPPORTED ACCOMMODATION AND ASSISTANCE PROGRAM(SAAP) AND HOMELESSNESS

Despite the popular notion that Canberra is a privileged city where poverty is virtually non-existent, homelessness and demand for supported accommodation continue. The 2001 census recorded 1229 people who were homeless in the ACT, and there is a widespread understanding that actual numbers of people functionally without a secure home are probably considerably higher.¹⁹ According to the Australian Institute of Health and Welfare, the period 2004-2005 saw SAAP services in the ACT support 1, 550 clients for a total of 2, 350 support periods. While major reasons for seeking support included family breakdown and domestic violence (common Australia-wide), it was also notable that the main reason for support most commonly cited was eviction or loss of previous accommodation, with financial difficulty also listed as a very common cause. This is indicative of the lack of an adequate affordable housing sector in the ACT.²⁰

¹⁷ Barry Duggan and Andrea Sharam, *Bleak House: the implications of the contest between private utilities and landlords for the non-discretionary income of vulnerable households*, Institute for Social Research, Oct 2004

¹⁸ For further discussion, see ACTCOSS and ACT Shelter, *The Wealth of Home*, pp.14-16

¹⁹ Australian Federation of Homelessness Organisations, “Facts and Stats”, <http://afho.org.au> August 2006

²⁰ Australian Institute of Health and Welfare, *Homeless People in SAAP*, ACT, January 2006, pp.6, 18

Shelter was very disturbed, therefore, to note the announcement in the June 2006 ACT budget that a total of \$4m over 4 years would be cut from SAAP services in the ACT. While we recognise that the Commonwealth cut \$300 000 from SAAP V after the first year, this in itself does not justify the decision to cut funds at an ACT level. Another major explanation for the cuts was that SAAP services were not operating to full capacity. It is vital to note, though, that issues of staff turnover, sector viability and resourcing to deal with high needs clients must be addressed if these problems are to be solved for the long term.

Ongoing concerns are being expressed by services about how to implement the required cuts without compromising quality of care to their consumers. Here, there are a number of issues to be addressed. The most significant problem still appears to be a lack of exit points from SAAP. This reinforces again the need for an expanded, sustainable public housing system and stronger initiatives to promote private market affordability. While the Government's recent announcement of making 20 properties available for transitional housing is welcome, such a system will only work if adequate long term housing exists for people to move on to. SAAP services cannot be expected to find private market solutions without significant assistance.

It is also crucial that the policies of delivering public housing primarily to those in absolute highest need, and encouraging quicker journeys for clients through the SAAP sector, do not have the result of further limiting access to SAAP. *Breaking the Cycle: The ACT Homelessness Strategy* (2004) undertook to address primary, secondary and tertiary homelessness, and cited prevention and early intervention as central principles.²¹ It is critical that these aims and principles are not abandoned, and that the focus on addressing primary 'street' homelessness (important and laudable though it is) does not have the effect of rendering other forms of homelessness and housing stress invisible or neglected. It is also vital that initiatives to lessen the periods of time spent in SAAP do not result in some residents being placed under pressure to leave without adequate accommodation to exit into, a scenario which would seem likely to result in people revolving through the SAAP system at high personal cost.

There appears to be some interest in exploring support for other options for people at risk of homelessness, to lessen demand for SAAP services. While certain innovations in this area could be very positive, Shelter would express some broad concern at the suggestion of offering support for people in homelessness to sustain informal 'couch surfing' arrangements. While informal support networks are crucial for many people experiencing homelessness, any suggestion of funding such an arrangement requires significant policy development. It raises an array of questions about how such supportive funding would be allocated and how such a form of tenure (which is, by definition, informal and sometimes transient) could be regulated. It is particularly recommended that the Tenants' Union be involved in such consultations, especially given their recent work on occupancy law.

An unfortunate side effect of the recent cuts and changes to SAAP has been to encourage a broad sense of uncertainty and insecurity amongst many members of the SAAP sector, and a feeling that open, informed dialogue is very difficult. The cuts appear to have occurred with very little prior consultation and as yet there is limited information and

²¹ *Breaking the Cycle: The ACT Homelessness Strategy*, April 2004, pp.1, 5, 10-11, 17

analysis about their impact. Shelter would call, therefore, for the release of a full overview of the cuts made to SAAP services following the June 2006 budget, including a breakdown of where funding has been reduced and where equivalent support is now provided. It is also important that the Government continues to demonstrate a clear commitment to its objectives under the Social Compact (and referred to in the Homelessness Strategy), notably trust, transparency, mutual respect, and recognition of the community sector's independence and limitations. Part of this involves making adequate resources available to the SAAP sector for independent sector development services (following the cuts to ACTCOSS's SAAP RaDS). This is particularly important at a time when SAAP services are being expected to make major operational changes.

Shelter welcomes the announced incorporation of a poverty-proofing trial into the evaluation of the Homelessness Strategy in order to consider how policies and practices affect poverty and exclusion, and awaits more details on this.²²

Recommendations

That the Government continue to lobby the Commonwealth for increased funding for SAAP services, with highest priority given to areas of unmet demand and sector viability.

That the SAAP sector be adequately resourced to support people with high and complex needs.

That the Government commit resources to ensuring adequate long term exit options are made available for people exiting SAAP.

That any policies of resourcing informal support networks for people in homelessness (eg 'couch surfing') be accompanied by consultation and policy development, focusing on issues of regulation, eligibility and funding.

That the Government release a full overview of the cuts made to SAAP services following the June 2006 budget, including a breakdown of where funding has been reduced and where equivalent support for clients is now provided.

That adequate resources be made available for independent sector development services for the SAAP sector.

HOME OWNERSHIP AND HOUSE REPOSSESSIONS

Shelter was disturbed to note the 2006 findings of the Consumer Law Centre of the ACT from their report "*They want to take our house*": *An Investigation into House Repossessions in the ACT Supreme Court*. Amongst other developments, this report observed:

²² ACT Budget 2006-2007, Paper No.3, *Budget Overview*, p.198

- *a sharp increase in the number of actions for possession brought by lenders during 2005 and 2006, compared to previous years (for example, 2005 saw a 39% increase in actions compared to the prior average)*
- *a significant increase in the number of writs obtained and later executed in 2005, compared to previous years (for example, 50% of all writs executed between 2002-2005 happened in 2005)*
- *an increase in the speed with which lenders moved to conclude litigation*
- *insufficient awareness amongst consumers about their contractual and consumer rights*
- *a startlingly high number of actions taken by non-bank lenders, compared to banks or credit unions, despite the fact that non-bank loans make up a small proportion of the overall number of home loans issued. The report argued that the sharp increase of actions taken in 2005 was largely due to the actions of non-bank lenders.*

The loss of housing through repossession represents a particular danger to low- and middle-income households. Here, the rapid growth of the non-bank lender sector over the last decade is highly relevant, with indications that people experiencing low or uncertain income or refinancing to deal with hardship are particularly likely to be drawn to this sector. Non-bank lenders are more likely to charge higher fees and interest rates and deal in ‘no-doc’ or ‘low-doc’ loans, which are subject to far less scrutiny as to whether the home-buyer can afford the repayments. The Consumer Law Centre also observed cases of finance brokers concealing or misrepresenting clients’ real income circumstances (often without the client’s knowledge), securing them loans which they could not possibly repay.²³

While significant action is required at a Commonwealth level, Shelter would also encourage ACT support for law reform to provide stronger consumer protection.

Recommendations

That the ACT Government lobby the Commonwealth for stronger national regulation of mortgage and finance brokers and non-bank lenders, with the aim of providing greater consumer protection.

That law reform be investigated to provide greater protection for consumers in relation to the conduct of mortgage and finance brokers.

That law reform be investigated to require lenders to carry out a reasonable assessment of a borrower’s capacity to repay their loan.

²³ See Amy Kilpatrick, Consumer Law Centre of the ACT, “*They want to take our house*”: An Investigation into House Repossessions in the ACT Supreme Court, Canberra, 2006

HOUSING AND DISABILITY

The past year has seen some positive developments in Government policy towards adequate housing for people with disabilities. This included an initiative to reduce the number of young people with disabilities living in residential aged care facilities, as well as the inclusion on the Housing ACT Priority applicant list of people with disabilities whose natural support systems are breaking down. It was also pleasing to note the 2006 Variation No.229 to the Territory Plan, requiring 10% of new multi-unit developments of 10 or more dwellings to meet relevant Australian standards for adaptable housing. However, accessing and retaining adequate housing remains difficult for many people with disabilities in the ACT. The new Federal Welfare to Work laws also seem likely to drive many people with disabilities further into poverty and, quite possibly, into housing stress.

It is therefore particularly important that policy changes are not introduced that would have the effect of further harming the housing situation of people with disabilities. Security of tenure for public housing tenants is particularly relevant here. Furthermore, any consideration of the position of market renters in public housing must take into account the fact that market rent is calculated according to combined household income. This can overshadow the fact that people with disabilities are often on significantly lower incomes than the other members of their households.

In the area of public housing, there continues to be some concern expressed about allocations, whereby some tenants without disabilities are allocated modified properties, while some with disabilities must wait for another property to be adjusted to their needs. Better data collection and / or more responsive allocations policies may be needed to address this.

The private rental market remains inaccessible to many people with disabilities. This is partly because of the frequently expensive nature of private rental housing in Canberra, partly because of the inadequate supply of accessible, well-located housing, and, anecdotally, also because of discrimination by landlords and real estate agents. It is therefore important that the disability-accessible housing introduced under Variation 229 of the Territory Plan be affordable to a range of income groups, and that any initiatives to increase the supply of affordable private housing in Canberra include a disability-accessible component. It is also worth investigating the possibility of providing greater Government support for families who wish to modify their house in order to support a family member who has acquired a disability (perhaps as an alternative to that person requiring public housing.)

Shelter commends the ACT Government's commitment to the principle that it is in the interest of people requiring support that the management of housing should be provided separately from this support. Such a structure helps guard against the vulnerability that accompanies being dependent on one agency for both elements. However, it is important that both service support and tenancy management be properly resourced and the relationship between the two areas correctly managed.

Another barrier to accessing appropriate private rental housing is lack of information. Options for addressing this could include either a central point of information detailing accessible housing in the private market, and / or working with the Real Estate Institute to

ensure that houses advertised include information about whether they are disability accessible. In the area of information gathering, Shelter would also support ACTCOSS's calls for greater qualitative and quantitative data about the relationship between disability and poverty in the ACT, including rates of access to housing and homelessness services by people with a disability.

Recommendations

That the Government develop mechanisms for ensuring that the disability-accessible housing introduced under Variation 229 of the Territory Plan be made affordable for a range of income groups, including people on low and very low incomes.

That Housing ACT ensure that modified Housing ACT stock is used effectively to meet the needs of people with a disability.

That the possibility of providing greater support for families who wish to modify their houses for the needs of a family member who has acquired a disability be investigated.

That there be a register of accessible accommodation in the private rental market.

That there be greater statistical analysis of relationships between disability and poverty in the ACT, including rates of access by people with a disability to housing and homelessness services.

INDIGENOUS HOUSING

Indigenous people in Canberra continue to constitute a group particularly vulnerable to homelessness and housing stress. The 2001 census estimated that about a fifth of Indigenous households in Canberra were spending more than 30% of their income on housing costs, around 30% of Indigenous housing reported major structural problems, and 17% of Indigenous housing reported overcrowding. (Anecdotal reporting in the community sector suggests the problems may be greater than these statistics can capture.) More generally, Indigenous people are more likely than non-Indigenous people to be tenants, with over half (56%) of Indigenous Canberrans renting their homes, and almost a quarter (24%) living in public housing.²⁴ Breaking the Cycle: The ACT Homelessness Strategy (2004) observes:

Aboriginal and Torres Strait Islander people are more vulnerable to homelessness than the broader population. Their homelessness encompasses physical, spiritual and cultural aspects and is compounded by issues such as poor health and disadvantaged social and economic circumstances.²⁵

This report observes that Indigenous people in the ACT are overrepresented in SAAP services, whilst at the same time probably not accessing SAAP services as much as they need to.

Once again, broad issues of housing affordability must be considered crucial, and private market discrimination continues to be reported anecdotally. The importance of a viable, sustainable public housing system would also seem to have particular relevance, given

²⁴ Chief Minister's Dept, *A Social and Cultural Profile of Aboriginal and Torres Strait Islander People in Canberra*, Aug 2004, pp.51-56

²⁵ *Breaking the Cycle: The ACT Homelessness Strategy*, April 2004, p.13

the disproportionately high representation of Indigenous people in this system. (For instance, Paul Flatau and Lesley Cooper's AHURI report *Indigenous Access to Mainstream Public and Community Housing*, October 2005, pointed out that the Indigenous demand for public housing Australia-wide demonstrated the fundamental importance of a thriving public housing sector.)

Shelter welcomes the inclusion on the new public housing Priority allocation list of "Indigenous individuals and families having difficulty accessing private rental accommodation and facing complex issues". We await further information about how such evaluations will be made and how relevant support services will be enabled to participate in this process. Shelter would express some concern about the potential impacts on Indigenous people of the new 6 month residency requirement, given that some people in need may move between NSW and the ACT to access family support. Ongoing commitment is needed to a coordinated approach between support services for Indigenous people throughout the region.

At a more local level, while many Housing ACT staff have been praised for their care and commitment to Indigenous clients, occasional concerns continue to be voiced by clients and applicants who encountered ignorant or culturally inappropriate treatment by HACT staff. It is important that ongoing staff training occurs in this area.

Shelter would also suggest that more work be done to ensure that the announced cuts of approximately \$4m from SAAP services do not have a particularly adverse effect on the quality of services to Indigenous clients. We note the findings of the Lesley Cooper and Mary Morris's 2005 AHURI report *How to help Indigenous families into stable housing and sustaining tenancy*, which noted that transience, disconnection, shame and different understandings of homelessness caused particular problems for Indigenous women and children accessing support services. This report pointed to the importance of outreach strategies, ongoing contact with clients after they were housed, and promoting greater cross-cultural understandings of house and home. It is to be hoped that such efforts will be promoted and resourced in the Canberra SAAP sector.

Shelter also notes with concern an apparent reduction in support to several Indigenous housing services following the June 2006 budget, with one hitherto quite well funded organisation taking a reported 80% cut. This raises questions about the clarity and consistency of the Government's vision for Indigenous housing in Canberra. It is important that if Indigenous-specific housing services are to be supported, that they be adequately resourced to meet the demand.

Recommendations

That greater coordination occur between the Commonwealth, ACT and NSW Governments, public housing bodies and the community sector to ensure a coordinated approach to Indigenous housing need in the region.

That research be conducted into the impact of the changes to SAAP resourcing on Indigenous clients, with a particular focus on quality of care and adequacy of ongoing support to clients who have transitioned into housing.

That Housing ACT staff receive ongoing training in culturally appropriate approaches to housing, including in Indigenous understandings of safety, security and adequacy of housing.

That Indigenous housing organisations be adequately resourced to meet the demand for their services.

HOUSING YOUNG PEOPLE

Young people continue to face difficulties in Canberra's expensive private rental market, often due to low income, discrimination and / or lack of independent living experience. Young people in the ACT also face a disproportionately high risk of homelessness. The Australian Institute of Health and Welfare SAAP Data for 2004-05 noted that almost half of SAAP clients in the ACT were aged under 25, with young women particularly likely to be in SAAP.²⁶ It appears that ACT SAAP services assist a higher proportion of young people than the national average (where about a third of SAAP clients were recorded as being under 25).²⁷ Thus, it is especially important that changes to SAAP do not adversely affect young clients.

The key principles of prevention of homelessness and early intervention must not be ignored when dealing with young people in housing stress and homelessness. This is particularly noteworthy given the work done as part of the ACT's Blueprint for Young People "At Risk", which recognised the role of family poverty, low incomes, insecure / unsafe accommodation and homelessness in placing young people in increasing degrees of risk.²⁸

It is important that the major actions identified under the Youth Homelessness Action Plan (2005) be achieved. Particularly important elements included:

- *additional training for Housing ACT staff to strengthen their understanding of youth issues and enable them to work more effectively with young people to sustain tenancies*
- *that an additional appropriate stairwell be provided within a Housing ACT multi-unit complex specifically for young people, who would receive support from appropriate agencies*
- *that a second youth boarding housing or long term affordable accommodation be established in line with the evaluation and recommendations of Lowana House.*

Given the need many young people experience for greater assistance in developing tenancy skills, we would also recommend consideration be given to resourcing greater training for youth workers in this area. This is in recognition of the fact that youth workers may well be a young person's first point of contact for such issues, but may lack the necessary training in this area. The outcome could be a project where youth workers were trained to help increase young people's access to and ability to sustain tenancies in the private market.

²⁶ AIHW, *Homeless People in SAAP*, Australian Capital Territory, 2004-05, pp.9-10

²⁷ AIHW, *Homeless People in SAAP*, Australia, 2004-05, pp.17-21

²⁸ ACT Government, *Blueprint for Young People "At Risk"*, pp.7-9

Recommendations

That the actions identified under the Youth Homelessness Action Plan be implemented, particularly additional training for Housing ACT workers in dealing effectively with young people, and the allocation of an additional appropriate stairwell within a Housing ACT complex for young people.

That a second youth boarding housing or long term affordable accommodation be established in line with the evaluation and recommendations of Lowana House.

That resources be allocated to providing greater training for youth workers to enable them to better assist young people in accessing and maintaining tenancies.

STUDENTS

Post-secondary students make up an important part of Canberra's cultural and economic life, with the ACT frequently promoted interstate and overseas as a desirable place to study, resulting in large numbers of people moving to Canberra for this specific purpose. (For example, the ANU Student Association's 2005 Higher Education Survey of 608 students found that 42.43% had moved to there from interstate, with a further 18.59% from overseas.) Yet, living in Canberra as a student remains difficult for many, and several student bodies we consulted highlighted accommodation as a critical issue.

Living on campus, although convenient, can be expensive. Tariffs for colleges at ANU, UC and CIT ranged between \$111 - \$265 per week (depending partly on whether food was included). According to the ANU's survey, 44.05% of students paid over \$120 per week in rent. For students renting in the private market, Canberra's affordability difficulties can be particularly acute, with rents highest in the inner suburbs near ANU and CIT. The fact that student living is often characterized by low incomes and transient living arrangements makes them unattractive to many landlords, creating additional problems. Such difficulties are particularly significant for students moving to Canberra for the first time.

For students receiving Youth Allowance and Commonwealth Rent Assistance, the maximum weekly payment received is approx \$267, which leaves many students with a choice between housing stress and working significant additional hours outside of study. The 2005 ANU survey found that nearly a fifth of students interviewed had either dropped or failed a subject because of work commitments. More seriously, CIT has observed homelessness amongst some of their students and notes with concern the willingness of some students to live even in demolition-targeted public housing (in the case of the 100 students housed at Currong flats) as affordable housing options are so scarce.

Recommendations

That the ACT Government investigate the merits and potential of providing a low-cost, temporary hosting area, in recognition of the particular strains experienced by some students new to Canberra.

That any incentives offered by Government to universities and developers to provide affordable student accommodation should employ clear definitions of affordability developed in consultation with the community sector and student advocates.

WOMEN AND HOUSING

It is widely accepted that poverty is gendered in nature, and that women continue to bear a disproportionate responsibility for the care of children and elderly and disabled relatives. There is also ongoing concern at the probably disproportionate harm that will be done to women by the introduction of new Federal Welfare-to-Work laws, particularly those affecting sole parents and people with disabilities. In this context, adequate housing emerges as crucial to women's wellbeing. Shelter noted that at the recent consultation summit around the ACT Women's Plan (30 August 2006), adequate housing was raised as important by advocates across a range of sectors, including domestic violence, disability, multicultural, and health.

ACT Shelter acknowledges that the ACT Women's Plan (2004) identifies "responsive housing" as one of its key objectives. The plan observes the fundamental importance of public and community housing to many women on low incomes, the essential place of security of tenure, and the importance of structuring housing assistance to meet the particular needs of Indigenous women, refugee women, and women exiting the prison and rehabilitation systems.²⁹ Some important positive steps have occurred recently in the area of women's housing; for instance, the decision to enable Housing ACT tenancy agreements to be transferred into the victim's name in cases of domestic violence.

Importantly, the Women's Plan also notes:

*policy and program development must be informed by gender-disaggregated data and the use of gender analysis ... The need for improved collection of gender disaggregated data and its use as a catalyst for change is recognised as a priority.*³⁰

However, as yet, Shelter has observed little use of such data to explicitly shape housing policy development. The ACT Budget papers for 2006-2007 commented that:

*Substantial consultative processes undertaken through the Ministerial Housing Advisory Forums, the ACT Ministerial Housing Consumer Forum and the Housing Summit inform key housing issues affecting women in the ACT.*³¹

However, explicit gender analysis did not seem to inform last year's ministerial housing forums, or the papers and discussions related to the February 2006 Housing Summit. As yet, there does not appear to be much new information available about the gender composition of public housing, or the gendered impact of changes to Housing ACT's eligibility and allocation systems. While Shelter recognises the need for the Government to prioritise competing concerns, it is important that gender data and analysis are readily available as a means to both shape and evaluate housing policy and practice.

²⁹ ACT Women's Plan, 2004, p.8

³⁰ *ibid*, p.5

³¹ ACT Budget 2006-2007, paper no.3, budget overview, p.198

Recommendations

That a gender analysis informs the development of Housing ACT policy and practice, and the development of indicators of poverty and housing stress.

That the priorities of the ACT Women's Plan (2004) be taken into account in the formation of housing policy, particularly with respect to the importance of adequate housing and security of tenure for women and girls.

MENTAL HEALTH

Affordability, once again, continues to be nominated as an important barrier to mental health consumers accessing adequate housing, as health problems can make it difficult to sustain well-paid work. This makes both home purchase and private rental difficult and sometimes impossible.

Public housing constitutes a particularly important source of housing for people with mental illness, given its comparative affordability and security. There are a few elements of Housing ACT policy and practice which need particular attention. The increased targeting of waiting lists has potential positive and negative elements for mental health consumers. On the positive side, the creation of the new Priority category specifically targets people with mental illness for prompt housing, and we note the emphasis placed on targeting to people who have adequate support systems in place. However, on the down side, the emphasis on targeting only to people in the most severe need sits uneasily beside the uneven or episodic nature of much mental illness and has the potential to contradict the preventive and early intervention approach widely recommended for addressing both homelessness and mental illness.

It is particularly important that those people working with mental health consumers – notably Housing ACT staff and workers in SAAP and YSAAP services – have adequate training to deal effectively with clients with mental illness. For instance, Shelter notes with concern the SAAP data figures for 2004-5, which indicated that in the ACT, an unacceptably large percentage of requests by people in SAAP for psychological and psychiatric assistance went unmet (30.2% and 22.6% respectively).³² It is vital that the current importance placed on making savings within the SAAP sector does not further damage the capacity of services to assist clients with mental health support.

Furthermore, occasional unfortunate examples continue to emerge of Housing ACT employees lacking adequate training and understanding of mental illness. With the closure of several Housing ACT shopfronts, and the suggestion of greater use of telephone communication and outreach work, it is particularly important that sufficient training is provided for staff to assist mental health consumers.

More broadly, it is also important that training and options are sufficient to enable mental health consumers to be allocated housing appropriate to their needs. Here, it must be kept in mind that mental health can be sensitive to different types of housing – eg, phobias, sensitivity to noise, difficulties interacting with neighbours, and the need for housing in a

³² AIHW, *Homeless People in SAAP, 2004-05*, Australian Capital Territory, p.28

location near support networks and health facilities.³³ Prompt, adequate maintenance can also be crucial, especially with respect to security.

Recommendations

That adequate mental health / dual diagnosis training be provided for Housing ACT and SAAP / YSAAP workers.

That greater transitional support be provided for mental health consumers before, during and after being allocated public housing.

That research be conducted into the impact of shopfront closures and new outreach support on mental health consumers, to evaluate this strategy.

CALD AND REFUGEE HOUSING

ACT Shelter recognises and commends the ACT Government's commitments to a human rights-based approach towards refugee issues, including the continued funding of Companion House and the ACT Refugee Resettlement Services Plan.

However, it is apparent that refugees as a group remain very vulnerable to homelessness or housing stress. Refugee advocates point out that every case tends to be highly demanding and time-consuming. Problems exist across all categories of refugees. Temporary visa holders and asylum seekers (residing in the community while their cases are processed) can often be the most vulnerable, as they have less eligibility for official housing assistance. Their numbers in the ACT are quite small, however, with people who arrive under the Special Humanitarian Program (SHP) comprising the largest group experiencing housing difficulties.

Once again, affordability in the private market is nominated as the greatest barrier to adequate housing. Refugees from the mainstream humanitarian program are no longer sent to Canberra, specifically because of the affordability crisis, a fact which will affect the city's development. While most refugees arriving in the ACT in recent years have been proposed by loved ones under the SHP, it is a common experience for them to have great difficulty finding affordable private rental housing. This often leaves them dependent on their families and communities. Anecdotally, this can lead to high levels of stress and overcrowding, making it harder for people to recover from trauma, and leaving some families particularly vulnerable to domestic violence. These concerns are supported by some broader research, including Professor Andrew Beer and Paul Foley's AHURI report *Housing need and provision for recently arrived refugees in Australia* (issue 58, Aug 2005). This work nominated the main difficulties in finding adequate housing as low incomes, discrimination or harassment from real estate agents, landlords and neighbours, language difficulties and confusion about Australian tenancy arrangements. Location and overcrowding were also nominated as key concerns.

Public housing is an option for SHP arrivals (and for temporary visa holders and asylum seekers who can prove "severe disadvantage"), and there has been praise for the

³³ Astrid Reynolds, Susan Inglis and Anne O'Brien, AHURI, *Stable housing for people living with a mental illness*, issue 16, February 2003

responsive and helpful attitudes of many Housing ACT staff. Nonetheless, long waiting lists continue to be nominated as a problem. We would also express some concern over whether the closure of most Housing ACT shopfronts will disproportionately affect people without strong English-language skills.

Another issue of ongoing concern nominated is a shortage of strong, qualitative and quantitative data on the housing circumstances of refugees and people from culturally and linguistically diverse backgrounds. Although the ACT Women's Plan nominates the provision of better gender-specific data across all Government agencies as a key area for action,³⁴ we still hear concerns raised that much of the information advocates have to rely upon is anecdotal. We would therefore encourage greater resourcing of qualitative and quantitative research into the housing needs of new arrivals, with the aim of providing accessible, gender-disaggregated data to better support research and policy development.

Recommendations

That the ACT Government give consideration to funding a transitional housing facility for newly arrived refugees.

That ACT Housing undertake further research and consultation with relevant communities and organisations regarding the housing needs of refugees, with a particular focus on how the new allocation system can best address these needs.

That research be conducted into the impact of shopfront closures on people from CALD backgrounds, and, if necessary, alternative strategies be developed for assisting CALD consumers, including culturally appropriate training for outreach workers.

That greater consideration and resources be given to increasing and improving qualitative, quantitative and gender-disaggregated data into unmet need for adequate housing amongst new arrivals in the ACT.

³⁴ See *ACT Women's Plan*, 2004, Action Plan, p.1