

## Domestic Violence NSW

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



## About Domestic Violence NSW (DVNSW)

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

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

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

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

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

For inquiries relating to this submission:

**Moo Baulch**  
CEO, Domestic Violence NSW



<http://www.dvnsw.org.au/>

December 2016. © DVNSW

## Executive Summary

Domestic Violence NSW welcomes the opportunity to comment on the *IPART review of rent models in social and affordable housing*. As the peak body for specialist support services in our state, we have worked closely and collaboratively with DVNSW members, broader networks of specialist practitioners and government colleagues to encourage participation of service users, mainstream and specialist support providers, communities and stakeholders to gather relevant input to contribute to the review. We have a strong interest in improving responses to those experiencing or at risk of experiencing domestic and family violence (DFV) and homelessness.

DVNSW has worked closely with NCOSS, Homelessness NSW, Shelter NSW, yFoundations and the Tenants Union to ensure that our feedback on the review is comprehensive and evidence-based. We support and endorse the other peak bodies' submissions in relation to the IPART review. Homelessness, access to ongoing specialist domestic and family violence support and a lack of social and affordable housing are the main challenges that many victim-survivors in NSW face. DVNSW has consistently advocated for well-resourced and coordinated prevention, early intervention and crisis responses based in local community, consumer and sector expertise. In our work with member services we have identified the following key challenges:

- Every community has unique experiences, service systems, networks and populations and this shapes the ability of services to appropriately house and support those who need it. There are significant barriers to access social and affordable housing and a lack of appropriate, safe, accommodation directly impacts on DFV services being able to appropriately respond in a timely way to women, children young people and communities who have experienced violence.
- Services often have to make clients fit programs rather than being able to offer truly client-centred responses. DVNSW recommends that the rent review modelling be designed to support and deliver client-centred responses.
- In addition to the *NSW Homelessness Strategy* that is currently being scoped, there is an urgent need for resourcing from the Commonwealth and State Governments to meet demand for housing and homelessness supports. We will continue to advocate for effective strategies that go beyond changing rent modelling to address the ongoing and rapidly growing crisis in affordable housing.
- The timelines of this review are unrealistic. We recommend extensions and further consideration of the policy structures that impact on social and affordable housing availability.
- DVNSW maintains that underlying any review there must be recognition that for some cohorts, social housing is for life. Using language such as "*safety net*" and "*opportunity group*" reinforces unhelpful stereotypes and is not useful for advancing discussion on individual aspirations. Clients and tenants should be able to access appropriate, tailored support that assists them to reach their potential and recover from the impacts of violence wherever possible.
- There must be recognition of the huge gap between social and affordable housing rental rates and private rental market rates.
- In the UK, social housing comprises of around 18%<sup>1</sup> of the rental housing market, whereas in NSW (and Australia more generally) social housing is a very small component of the market. This fundamental difference limits the available options.
- Underpinning any reform or review of housing there must be a genuine intention and commitment to increase the supply of affordable and social housing and to make it available to victim survivors and perpetrators of DFV.

---

<sup>1</sup> Social housing in Europe, accessed 11<sup>th</sup> December 2016, <<http://www.lse.ac.uk/GeographyAndEnvironment/research/London/pdf/SocialHousingInEurope.pdf>>

- There must be an emphasis on collaboration across government departments in recognition on the intersectionality of multiple sectors that respond to DFV. NSW lacks the cross-government levers to ensure accountability for solutions that address individual circumstances.
- The review must include specific strategies for cohorts most at risk of DFV and homelessness including Aboriginal and Torres Strait Islander people, older women, children, young people, LGBTIQ communities, CALD women or women with migrant and visa issues, women with no access to income or Centrelink benefits and people with disabilities.
- There is minimal, (if any) choice in the social housing arena with tenants assigned properties if and when they become available. Housing is often allocated irrespective of whether that property suits a tenant's needs. In the context of DFV, especially when we consider the safety and location of women, children and young people in relation to the perpetrator/s this can lead to unsafe or unsustainable tenancies.
- There are too few affordable housing properties for individuals within the very low and low income thresholds.
- The current income threshold of eligibility for public housing lease renewal fluctuates depending on the median weekly rent of areas around the state. Generally, social housing tenants living in rural parts of NSW are able to rent in the private rental market without necessarily experiencing rent stress, while individuals living in metropolitan areas are not.
- Choices and options around housing are a key component in the process of recovery from trauma. We continue to advocate for the rights of those leaving DFV to be able to make decisions relating to their living situation rather than being forced to accept the only available option.
- A review of rent modelling will not appropriately address disincentives to entering or re-joining the workforce. The complex reasons for a person's long term unemployment need to be addressed with a nuanced person-centred approach taking into account access to support, training and other employment assistance programs. Productivity Commission research<sup>2</sup> has concluded "*that it is the characteristics of individuals, and not the characteristics of the housing assistance that they receive, that matter to participation in employment. Simply shifting tenants to market rents and CRA is likely to leave many tenants financially worse off, yet without any greater ability to access employment. CRA recipients are no more likely than public housing tenants to find employment, after accounting for the characteristics of individuals.*" We must develop a more sophisticated evidence-based approach to looking at the factors that limit long-term workforce participation.

---

<sup>2</sup> Productivity Commission 2015, Housing Assistance and Employment in Australia, Commission Research Paper, Canberra.

### DVNSW recommendations to the IPART review

1. Eligibility and prioritisation need to be thoroughly considered before the rental modelling is considered. DVNSW recommends a review of the timelines to adequately address interconnecting issues and complexities.
2. The scope for this review is extremely broad and its remit should go well beyond a pricing approach; timelines should therefore be adjusted to ensure that a thorough and effective review is conducted.
3. Appropriate eligibility and prioritisation approaches must take into account complex trauma and the impacts of violence. Clear, transparent trauma-informed processes should be developed that explain to tenants how they will be judged, on what criteria, who will make decisions and how these can be appealed or reconsidered. This is particularly important when there are safety considerations.
4. The shortfall in social and affordable housing stock must be urgently addressed. A rent model reform will not improve the sustainability and viability of the social and affordable housing system.
5. Applications for the *Start Safely* rental subsidy should be processed in a timely and efficient manner (5 working day turnaround) and be altered to take into account those on Newstart allowance and/or living in higher rental locations.
6. That a DFV victim-survivor's safety is considered first and foremost when being allocated a property. It is vital that appropriate property be sourced (ie in safe places, with safety measures/modifications made to the property where appropriate). Tenant choice should be a key principle for victim-survivors of domestic and family violence.
7. The IPART review should focus on the provision of affordable housing for those on very low and low incomes who are particularly vulnerable to becoming homeless, rather than narrowing the assessment criteria for social housing.
8. That IPART should review and implement all relevant recommendations from *A Plan for Change: Homes for Older Women* specifically taking into consideration the unique experiences of violence for this cohort and their unique social and affordable housing needs.
9. That vulnerable and marginalised groups such as Aboriginal and Torres Strait Islander families, women with disability, CALD women, LGBTIQ people and older women be considered in any priority of need.
10. That a panel of experts comprised of representatives from peak bodies and social and affordable housing academics should be established to oversee and guide the process.
11. Evaluation of income threshold for eligibility for public housing lease renewal should be set at a rate that is in line with the median rent in that area.
12. Transfers relating to tenants who are victim-survivors of DFV must prioritise choice for tenant and should take place following an expert risk and safety assessment.
13. Affordability modelling be undertaken to better understand the impact of removing concessions such as Family Tax Benefits Part A, B and the income of other members of the household. Allowances that are provided to people such as those with a disability, carers and foster carers relate to specific needs and should therefore not be included as assessable income. DVNSW supports the opinion that the proposed approach does not fully mitigate the risk of further disadvantaging those it aims to assist.
14. That the *Address Housing* rental model be evaluated after the initial client's 5 year tenure period is completed and that the leanings from this experience and model shape approaches to the provision of social and affordable housing to those leaving DFV.
15. A commitment to support and facilitate the ongoing integration of tenant and victim survivors voices to the *IPART review*.
16. That the NSW Government advocate for a national housing and homelessness strategy that addresses the gaps in the service system and provides adequate resourcing for victim-survivors to access safe, evidence-based supports.
17. That the *IPART review* and ongoing related policy developments in social and affordable housing be integrated with the NSW Government's *Domestic and Family Violence Blueprint*.

## Introduction and context

The NSW DFV system is struggling to cope with the demand in both the government and non-government response sectors. NSW Police report that DV related assaults have increased by 2% over the last five years whilst most other crimes types are stable or dropping<sup>3</sup>. Housing and accommodation services for victim-survivors of DFV are consistently at (or over) capacity. Practitioners constantly have to make choices about which families they can support and to what degree they can provide assistance because of demand.

This is not a problem that is unique to New South Wales. The latest Australian Institute of Health and Welfare data shows that around 279,000 Australians accessed homelessness services in the 2015-16 period up from 256,000 in 2014-15. Of these, 106,000 (38%) were adults and children seeking assistance due to domestic and family violence.<sup>4</sup> We expect support seeking and Police reports to increase as awareness continues to grow and we therefore need to design a housing and homelessness system that is responsive to that growth in demand whilst resourcing and growing evidential practice in early intervention and prevention.

DVNSW recognises that there are no quick fixes when it comes to addressing system gaps or inconsistencies in housing and homelessness responses. Similarly, there is no “one size fits all” model solution for survivors of domestic and family violence that will work for every community in NSW. Adequately addressing the drivers of domestic and family violence is challenging, sophisticated work that requires an ongoing intergenerational community and a long term integrated commitment to policy development by government.

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

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

In order to address gaps systemically and with a long term shared vision, significant work must be undertaken engaging practitioners, policymakers and community leaders to design structures and programs that will work in local settings and build on existing practice wisdom. There is a substantial and growing gap between social and affordable housing rents and private rental market rates. If this isn't addressed systemically, the challenges related to rising rentals will continue to increase, particularly in Sydney which has unprecedented levels of weekly median rents. This review needs to explore the substantial barriers to affordable private rental rates. The intersectionality of the cohorts of DFV victim-survivors and their needs within the social and affordable housing system must also be explored to ensure that any changes to the rent modelling do not unintentionally negatively impact upon them.

<sup>3</sup> BOC SAR, 2015 [http://www.bocsar.nsw.gov.au/Pages/bocsar\\_pages/Domestic-Violence.aspx](http://www.bocsar.nsw.gov.au/Pages/bocsar_pages/Domestic-Violence.aspx)

<sup>4</sup> AIHW, 2016 *Domestic & family violence and homelessness* <http://www.aihw.gov.au/homelessness/domestic-violence-and-homelessness/>

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

DVNSW recognises that for some cohorts, social housing is for life. Using language such as "safety net" and "opportunity group" reinforces unhelpful stereotypes and is not useful for advancing discussion on individual aspirations. Clients and tenants should be able to access appropriate, tailored support that assists them to reach their potential and recover from the impacts of violence wherever possible. DVNSW would recommend against categorising tenant cohorts based on age. There should be no assumption that someone who is young, for example, is fit and able to work and therefore should form part of the *opportunity group*. Individual circumstances must be taken into consideration. Complex trauma impacts on an individual's ability to find and remain in employment. Without access to adequate trauma-informed care and support victim-survivors are likely to need extended support (thus falling within the currently defined safety net group). Once an individual has recovered to the point where they are able to transition to the 'opportunity' group, they might then move across to a less vulnerable cohort. Individuals will have different trajectories to recovery and some may never fully recover from the impacts of long term abuse. The definition and structures around cohorts in this sense are not helpful when considering victim-survivors of violence and trauma.

***DVNSW recommends:***

- Eligibility and prioritisation need to be thoroughly considered before the rental modelling is considered. DVNSW recommends a review of the timelines to adequately address interconnecting issues and complexities.
- Appropriate eligibility and prioritisation approaches must take into account trauma and the impacts of violence. Clear, transparent trauma-informed processes should be developed that explain to tenants how they will be judged, on what criteria, who will make decisions and how these can be appealed or reconsidered. This is particularly important when there are safety considerations.

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

NSW has a lack of safe, affordable support options for families impacted by DFV. Women, children and young people who need to leave the family home often face lengthy waits and fragmented processes when attempting to secure crisis support and temporary or longer-term accommodation. There is a lack of crisis accommodation across the state and families are routinely referred to emergency temporary accommodation (often in motels or caravan parks) whilst they are waiting for longer-term options to be available. Temporary accommodation is often unsafe and access to outreach support highly dependent on the capacity of services, which DVNSW members report being at or over capacity the majority of the time. Effective crisis and early intervention responses can be challenging when a victim-survivor of violence is unable to access safe and affordable accommodation. Ultimately this means that women of all socio-demographics often stay in abusive relationships (or return to them) because of a lack of safe and appropriate housing options.

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

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

Resourcing also needs to be strategic and focused upon prevention and early intervention, trauma informed care crisis responses and exploration and development of affordable housing options. Although DVNSW welcomes rental subsidy models such as Start Safely, it does not always fit the circumstances of a survivor and their family. In addition, there are often lengthy wait times for applications to be processed and rental opportunities may be missed during this time. Applicants cite having to wait four weeks or more for their applications to be processed. This varies between districts and there is little consistency across Housing NSW offices as to how quickly applications can be processed. In addition, even with the extension in 2016, the subsidy does not allow for a victim-survivor to find an appropriate home in areas where rental prices are high (for example, in Sydney). It is particularly difficult for any victim-survivors on Newstart allowance to find a home, even with Start Safely subsidy.

The current framework severely limits a tenant's ability to choose which social housing property they might call home. Once applicants reach the top of the wait list, they are generally allocated an available property based on their preference for the area in which they would like to be housed and the characteristics of the household such as the number of people and need for a particular type of property. The suitability of housing is therefore, by and large, down to luck and timing. Tenants cannot reject more than two, and in some cases one, without being sent to the bottom of the wait list. Victim-survivors of DFV will know what areas they can safely reside, and what properties they will feel safe in. The limited scope for social housing tenants to choose their own home affects the responsiveness of the social housing system to meet the needs and preferences of tenants and has flow-on effects on the quality and efficiency of the system. It can also constrain a tenant's ability to make independent and informed decisions on, for example, where to safely send their children to school, which hospital to access, transport links and which food outlets and shopping centres to frequent.

***DVNSW recommends:***

- The shortfall in social and affordable housing stock must be urgently addressed. A rent model reform will not improve the sustainability and viability of the social and affordable housing system.
- Applications for the *Start Safely* rental subsidy should be processed in a timely and efficient manner (5 working day turnaround) and be altered to take into account those on Newstart allowance and/or living in higher rental locations.
- That a DFV victim-survivor's safety is considered first and foremost when being allocated a property. It is vital that appropriate property be sourced (ie. in safe places, with security measures and modifications made to the property where appropriate). Tenant choice should be a key principle for victim-survivors of domestic and family violence.

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

---

*Incentives for workforce participation:* DVNSW questions the paper's suggestion that some rent models and government payments are a disincentive to tenants participating in the workforce. This fails to understand the root causes of long-term unemployment and the impact that complex trauma can have on an individual's ability



to participate in the workforce. This is particularly relevant for those who have been victims of DFV for a prolonged period.

*Flexibility and choice for tenants:* In order to ensure any flexibility and choice for tenants the NSW housing stock would need to be substantially increased. The current available housing stock in NSW makes any effective user-choice principles difficult to implement and sustain. Victim-survivors of violence are not a cohesive cohort of tenants, some may need long term support and social housing, others may need to access government and NGO assistance for a relatively short period of time. Flexible tenancy options should be at the core of assessment criteria and support design for those impacted by violence and trauma.

*DVNSW recommends:* Clear, transparent trauma-informed criteria and processes should be developed that explain to tenants how they will be judged, on what criteria, who will make decisions and how these can be appealed or reconsidered.

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

---

We do not believe the criteria for social housing should be narrowed further simply because there is not enough social housing stock. Whilst it is important to ensure priority to those who are of the greatest need, the majority of those on the wait list require support and have a genuine need – particularly women and families impacted by DFV, regardless of whether they meet an income threshold. Narrowing the criteria is likely to put additional pressures on the Specialist Homelessness Sector, which is already delivering services beyond capacity and substantially above contracted levels and other social services. Those impacted by DFV are already a prioritised in the current system but there are hidden cohorts within this group that find securing appropriate social or community housing particularly difficult.

Social housing tenants tend to have higher employment rates and incomes than applicants for social housing, which reflects the positive impact that stable housing has on employment. Recipients of social housing support have also reported that they are in better health, are able to improve their employment situation and have better access to the services and supports they need once settled in stable accommodation (AIHW, 2015a). Safe, stable, sustainable housing must be at the core of priority support responses for people recovering from the impacts of trauma and violence.

Attempting to improve system viability by further excluding the most vulnerable in our society or creating hierarchies of disadvantage won't help to address or rectify the shortfall. Access to more affordable housing, especially for those in the very low and low income bands, increased rent assistance and flexibility of support for individuals seeking to transition into independent living is vital. Some cohorts have specific barriers and needs that must be considered

### **Older Women**

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

---

<sup>5</sup> *A Plan for Change: Homes for Older Women*. Published by Homelessness NSW on behalf of the Older Women's Housing and Homelessness Group, accessed October 2016 <[http://www.homelessnessnsw.org.au/images/stories/documents/Older\\_Women\\_Booklet\\_Web\\_Version.pdf](http://www.homelessnessnsw.org.au/images/stories/documents/Older_Women_Booklet_Web_Version.pdf)>

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

### Women with a disability<sup>6</sup>

Women with disability are estimated to be 37.3% more at risk of domestic violence than their peers.<sup>7</sup> In NSW alone, 43% of the women who experienced personal violence in 2011 were estimated to have a disability or long-term health condition, 7% higher than the national average.<sup>8</sup> Women with disability are particularly vulnerable to homelessness and to violence and require tailored assistance to access appropriate, affordable housing. Women with disability experience domestic and family violence in a range of ways and settings including:

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

We strongly recommend that the IPART review takes into consideration the experiences of women with disability who require social and affordable housing and the impacts of proposed changes particularly with reference to the income based modelling which proposes counting some tax benefits as assessable income, an approach DVNSW does not support (see Questions 20 – 24).

### Culturally and Linguistically Diverse Women experiencing DFV

CALD, migrant and refugee women who are victim-survivors of DFV are incredibly vulnerable in our current housing and homelessness system. In addition to the trauma resulting from violence, women in this situation are often experiencing substantial distress due to language and cultural barriers, social isolation and (for some) the impacts of post-traumatic stress disorder from events experienced in their country of origin. There are fears

<sup>6</sup> Women With Disability and Domestic and Family Violence: A Guide For Policy and Practice, People with Disability Australia and DVNSW, 2015

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

<sup>8</sup> Family and Community Services, 2014. 'Women in NSW 2014', NSW Government. <[http://www.women.nsw.gov.au/\\_data?assets/file/0019/300772/3303\\_WNSW-Report2014\\_web.pdf](http://www.women.nsw.gov.au/_data?assets/file/0019/300772/3303_WNSW-Report2014_web.pdf)>

<sup>9</sup> Frohmader, C. 2007b. 'It's not ok, it's violence: information about domestic violence and women with disabilities', Women with Disabilities Australia. <[http://wwda.org.au/wp-content/uploads/2013/12/Its\\_Not\\_OK\\_Its\\_Violence.pdf](http://wwda.org.au/wp-content/uploads/2013/12/Its_Not_OK_Its_Violence.pdf)>

<sup>10</sup> Frohmader, C. 2007b:8

of police, government institutions and authorities, often the perpetrator has threatened that if they seek help they will be deported and that no-one will believe them. There are a number of challenges associated with finding a support service that understands the complexities of their experience and can assist. Finding appropriate accommodation is difficult for all women experiencing DFV – let alone for women where cultural and language barriers exist.

Due to the complex immigration and human services systems, migrant women who flee violent relationships are often left without an ability to access an income. This cohort therefore relies heavily on the domestic and family violence (and the homelessness) sector for support in NSW. The particular circumstances of these families results in long stays in homelessness and domestic and family violence support accommodation with no exit options, which also prevents entry of new families to that service. Access to safe accommodation is a major challenge for this cohort of families. Information is limited around what support programs are available, and already overstretched services often struggle to navigate the system.

***DVNSW recommends:***

- That IPART focus on the provision of affordable housing for those on very low and low incomes and who are particularly vulnerable to becoming homeless, rather than an untenable narrowing of the assessment criteria for social housing.
- That IPART review and implement all relevant recommendations from *A Plan for Change: Homes for Older Women* and specifically take into consideration the unique experiences of DFV by this cohort and their specific social and affordable housing needs.
- That vulnerable and marginalised groups who are considered high risk in relation to domestic and family violence including Aboriginal and Torres Strait Islander people, LGBTIQ people and families, women with disability, CALD women and older women are considered in priority of need.

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

---

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

The criteria for people being encouraged into shared housing should be reconsidered. This model of housing is often not suitable to victim-survivors of DFV - particularly if they have children, are impacted by trauma or are people with disability.

***DVNSW recommends:***

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

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

---

DVNSW would advocate for the trial and evaluation of a voluntary system whereby those whose circumstances have changed are asked whether they might be willing to move into property more appropriate to their current circumstances and needs. The safety of a woman and her children who are victim-survivors of DFV must remain the priority. A nuanced understanding of the complexities of DFV is required by anyone making decisions regarding transfer of tenants. DVNSW recommends ongoing complex trauma and domestic violence training for all housing staff including departmental managers with oversight of those reviewing individual cases and making any decisions relating to the reassessment, especially where vulnerable tenants are concerned. There have been recent incidences of victims of sexual assault being moved into apartment buildings that also house their perpetrator. This is neither safe, nor acceptable.

*DVNSW recommends:*

- Transfers relating to tenants who are victim-survivors of DFV must prioritise choice for tenant and should take place following an expert risk and safety assessment.

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

---

To be considered affordable, rent should be no higher than 30% of gross income. We would consider the current rate of 25% of an individual's assessable income or market rent rate (whichever is lower) to be acceptable.

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

We recommend affordability modelling to understand the impact of removing concessions such as Family Tax Benefits Part A, B and the income of other members of the household. Allowances provided to people such as those with a disability, carers and foster carers are given for specific reasons and therefore should not be included as assessable income.

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

*DVNSW recommends:*

- Affordability modelling to better understand the impact of removing concessions such as Family Tax Benefits Part A, B and the income of other members of the household. Allowances that are provided to

people such as those with a disability, carers and foster carers relate to specific needs and should therefore not be included as assessable income. DVNSW supports the opinion that the proposed approach does not fully mitigate the risk of further disadvantaging those it aims to assist.

- That the *Address Housing* rental model be evaluated after the initial client's 5 year tenure period is completed and that the learnings from this experience and model shape approaches to the provision of social and affordable housing to those leaving DFV.

Related reforms and policy:

- We have significant concerns relating to the NSW Government plans to reintroduce tenancy bonds for new public housing tenancies. *We recommend a complete exemption for tenancy bonds is provided for those impacted by domestic and family violence and that there is a commitment to support and facilitate the ongoing integration of tenant and victim-survivors voices to the IPART review.*
- Given the recent announcement about a 12 month extension to the National Partnership Agreement on Homelessness and the lack of certainty that this offers to homelessness services, we recommend *that the NSW Government advocate for a national housing and homelessness strategy that addresses the gaps in the service system and provides adequate resourcing for victim-survivors to access safe, evidence-based supports.*
- *The IPART review and ongoing related policy developments in social and affordable housing be integrated with the NSW Government's Domestic and Family Violence Blueprint.*

### ***Conclusion***

---

DVNSW notes that a number of the themes and key challenges raised in the IPART review discussion paper represent a culmination of successive failures to properly resource and adequately support the intersectionality between domestic and family violence, homelessness and social and affordable housing. We believe that the IPART review represents an opportunity for a fundamental shift in our housing responses for those at risk of, and currently experiencing domestic and family violence, to ensure they do not have to experience homelessness or housing stress on top of the life altering trauma associated with domestic and family violence. We are committed to working alongside government, NGOs, specialist domestic and family violence services and the private sector as well as those who have or are experiencing domestic and family violence to improve access to services, tailored support and long term, sustainable housing options.