



SHELTER TAS' SUBMISSION TO THE STATE GOVERNMENT BUDGET PROCESS 2022-23



ShelterTAS
Housing and Homelessness Peak

GPO Box 848 Hobart Tasmania 7001 | www.sheltertass.org.au
E: ceo@sheltertass.org.au | P: (03)6224 5488 | M: 0419 536 100

SUPPORTED BY



Tasmanian
Government

Shelter Tas is supported by the Department of Communities Tasmania.



Shelter Tasmania acknowledges the Traditional Owners of country throughout Tasmania and their continuing connection to the land, sea and community. We pay our respects to them and their cultures, and to elders past and present.



Shelter Tas welcomes and supports the LGBTIQ+ community and the creation of a diverse and inclusive society.

© Shelter Tasmania Inc. 2021



This work is licensed under a Creative Commons Attribution-NonCommercial 4.0 International License, see <https://creativecommons.org/licenses/by-nc/4.0/>.

TABLE OF CONTENTS

INTRODUCTION	1
Section 1	
1. A 10% target for social housing	5
2. A Housing Impact Analysis and Housing in All Policies approach	6
3. Women’s Housing Strategy	7
4. Support for NRAS tenants	7
5. From NIMBY to YIMBY – Yes In My Backyard.....	8
Section 2	
6. Innovative Housing Options	9
7. Enhance Investment in Community Housing	10
8. Ongoing funding for Safe Space model	10
9. Cost and administrative burden of new child safety legislation	11
10. Mental Health and AOD support	11
11. Improve housing for younger Tasmanians	12
12. Funding for Rapid Rehousing for people escaping Family Violence.....	13
13. Re-fund the expiring Private Rental Incentives	14
14. Improve Housing Outcomes for Older Tasmanians	14
15. Rapid Rehousing for Veterans and for People exiting Prison.....	15
16. People on low and zero outcomes who are leaving domestic violence	15
17. Tasmanians living with disability	16
18. Improving conditions in the private rental market	18
19. Standards for Specialist and Supportive Accommodation	19
20. Shelters to include options for accommodating pets	19
21. Energy Efficiency Measures	19
22. Consumer Participation.....	19
23. ERO and Indexation	20
CONCLUSION	20

ABOUT SHELTER TAS AND OUR MEMBERS

Shelter Tas is the peak body for housing and homelessness services in Tasmania. Each year, Shelter Tas is invited to represent the sector on housing and homelessness issues in the State Government Budget Process. We are pleased to provide this submission to the **2022-23 State Government Budget Process**.

Shelter Tas represents the interests of low to moderate income housing consumers, Community Housing providers and Specialist Homelessness Services (crisis and emergency shelters) across Tasmania. The membership of Shelter Tas includes all funded homelessness services and all registered Community Housing providers in Tasmania. The housing and homelessness sector directly employs more than 850 people across Tasmania, and manages more than 9 000 properties.¹

Shelter Tas is an active member of national housing and homelessness peaks, including the Community Housing Industry Association (Shelter Tas is the CHIA representative in Tasmania) and National Shelter.

Shelter Tas' vision is that every person has affordable, appropriate, safe and secure housing, and our mission is to end homelessness in Tasmania. Our submission draws on our regular meetings and consultations with member organisations across the state, as well as the most up to date research, evidence and analysis. The recommendations in the Shelter Tas Submission to the Tasmanian Budget 2021-22 reflect the priorities expressed by our members, and are endorsed by our 16 member Policy Committee.²

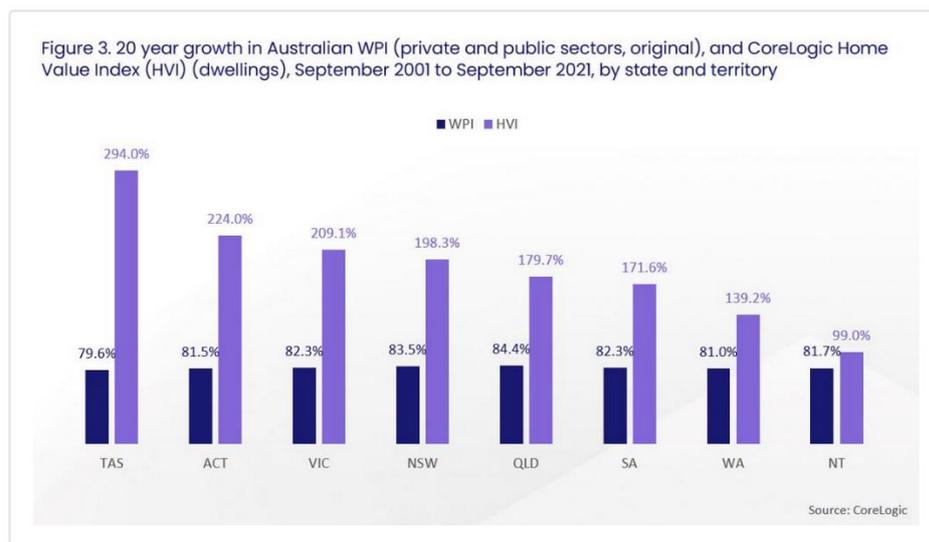
¹ Shelter Tas research 2020 (unpublished).

² <https://sheltertass.org.au/about-shelter/organisational-structure/>

INTRODUCTION

The Tasmanian housing context – as at December 2021

Tasmania’s Housing System faces systemic and structural challenges. House prices and rental costs are growing much faster than people’s incomes, with the worst impacts on those who can least afford higher prices. According to CoreLogic’s November 2021 report, Tasmania’s wages have seen the lowest increase in the country over the last 20 years, and house purchase prices have seen the highest increase over that period.¹



For renters, data consistently show that Hobart remains the least affordable Capital City and Rest of the State the least affordable region in the country.²

Tasmania continues to face a critical shortage of affordable rental homes. Tasmania’s private rental market is now tighter and more competitive than at pre-COVID levels. People needing affordable rentals are facing a crisis of availability and affordability all across the state. The 2021 Rental Affordability Index reports that:

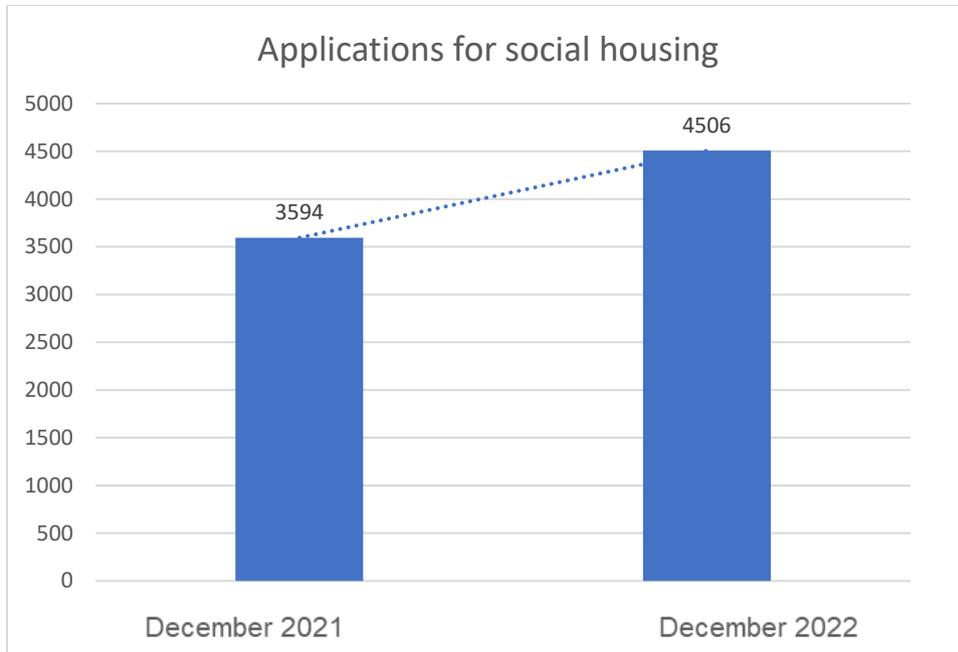
Although household incomes in Tasmania are significantly lower than the national average, rents are only marginally lower than mainland averages. The gap between income and rent has been widening over the past four years, with little sign of abating. A comparison of Rental Affordability Index (RAI) scores in Greater Hobart and Greater Sydney over recent years (see Figure 24) shows that while the two cities have shared similar levels of rental affordability in the past, the gap between their RAI scores has widened considerably since 2017.³

¹ https://www.corelogic.com.au/news/how-much-has-house-price-growth-outstripped-growth-wages?utm_medium=email&utm_source=newsletter&utm_campaign=20211122_propertypulse

² https://www.sgsep.com.au/assets/main/SGS-Economics-and-Planning_Rental-Affordability-Index-2021.pdf

³ https://www.sgsep.com.au/assets/main/SGS-Economics-and-Planning_Rental-Affordability-Index-2021.pdf p.46

In last year’s Budget submission, Shelter Tas noted there were 3 594 applications on the waiting list for social housing. This year, there are 4 506 applications – an increase of almost 1 000.⁴ However, the State Government is yet to commit to a long-term percentage target for social housing. We repeat our call for 10% of all dwellings in Tasmania to be affordable social housing as the number one priority for this Budget Submission.



In 2020, we wrote in our submission to the PESRAC inquiry:

The COVID-19 public health emergency has highlighted the crucial link between housing and health – without a home to stay in, people cannot practice hygiene and social isolation. Tasmania is only safe when citizens are securely housed. Housing needs to be the cornerstone of any pathway to recovery.⁵

In 2022-23, Housing will remain at the heart of Tasmania’s response to and recovery from the COVID-19 pandemic. At the time of writing (December 10) the state borders were due to open in 5 days (December 15). Health planning and response needs to include a housing and emergency accommodation response for all Tasmanians, with the option to renew and build on the suite of COVID-19 responses from 2020-21.

The commencement of the *Tasmanian Housing Strategy* is a significant development for 2021. Shelter Tas welcomes the commitment to take a holistic and comprehensive perspective on the next 20 years. In line with this 20 year strategic approach, Shelter Tas recommends that all government policies and decisions need to understand the housing system and its links to productivity, economic growth, health and wellbeing. We call for the inclusion of housing in all polices across government, and for a Housing Impact Analysis for all major decisions.

⁴ https://www.communities.tas.gov.au/_data/assets/pdf_file/0027/196065/Housing-Dashboard-October-2021-web.pdf

⁵ https://www.pesrac.tas.gov.au/_data/assets/pdf_file/0019/250714/Shelter_Tasmania.pdf

In our 2021 response to the *Consultation on the Tasmanian Women's Strategy (2022-25)*, Shelter Tas recommended a Women's Housing Strategy, focussing on the needs and experiences of women where these are different from more typically male or gender neutral patterns.⁶ Housing affordability, family breakdown, family and domestic violence and ageing are issues with particular impact on the housing security of women and girls, including all people from LGBTQI+ communities who identify as being part of this cohort. A Women's Housing Strategy will be a vital part of the overall *Tasmanian Housing Strategy*.

Tasmania has seen positive initiatives in the last year, including some that Shelter Tas has long supported, such as the introduction of the Wintringham model in Hobart. We have also seen expanded capacity at Women's Shelters in the north and south regions, and the introduction and introduction of Safe Spaces (low barrier shelters) in the south, north and north-west regions of the state. These have demonstrated their value as an essential part of Tasmania's response to homelessness, and in our submission we call for secure ongoing funding over the forward estimates for the Safe Space Model.

The Community Housing Growth Program has commenced, boosting the proportion of homes managed by skilled and professional Community Housing Providers who now are responsible for the majority of social housing tenancies across the state. CHPS are also responsible for building the increasing number of new social homes across the state. We are calling for greater efficiencies in the planning system and commitment to inclusionary zoning across Tasmania to enable and expedite increased construction of much needed social housing.

Increased supply of long-term social housing homes and emergency responses for people in crisis, as part of the *Tasmanian Affordable Housing Strategy (TAHS)* are important and very welcome. However, many Tasmanians still remain dependent on the private rental market for their housing, and the chronic shortage of affordable rentals in the private market remains very concerning. Since the start of the TAHS in 2015, affordable private rentals are more scarce than ever, and the level of social housing, while increasing, is unable to keep pace with the escalating demand. Tasmania needs to monitor and manage the impacts on the long-term residential private rental market of Short Stay Accommodation such as AirBnB. Not only is Hobart the least affordable capital city for renters in Australia, but it has the highest density of short stay accommodation.

Population and the demand for Tourist Accommodation are also increasing across the state, placing further pressure on the residential rental market. Tasmania needs to monitor and manage the impacts of tourism and visitor accommodation on the residential private rental market.

The relief of Tasmania's longstanding housing debt to the Commonwealth Government in September 2019 brought a very welcome and much needed boost to the resources Tasmania needs to address our chronic housing and homelessness challenges. Like other Australian jurisdictions, Tasmania has seen the number of social housing dwellings lagging behind population increases. The 2019 Report on Government Services (ROGS) states: *over the past decade, the number of social housing dwellings [nationally] has increased by 29 930 (or 7.4%) - well behind population growth of 11%.*

⁶ https://shelertas.org.au/wp-content/uploads/2021/11/Womens-Strategy-Submission-Nov-21_FINAL.pdf

Shelter Tas acknowledges the good outcomes achieved by many initiatives and successful programs within Tasmania's *Affordable Housing Strategy 2015-25* (TAHS), and the *Affordable Housing Action Plan II 2019-23* (AHAP 2), the responses to the COVID-19 pandemic, and the initiatives in the last few years, such as Youth At Risk centres, Safe Spaces and increased capacity at Shelters.

While much important work is underway to relieve housing hardship and homelessness across Tasmania, we know that housing costs are continuing to outstrip people's incomes, especially for people in the lowest income quintiles. We know that people can only remain healthy when they have appropriate, affordable, safe and secure housing, and we know that the 'Hospital at Home' response to COVID-19 can only be effective when people have safe, stable and appropriate homes. In 2022-23 and beyond, housing will remain essential to secure any public health outcomes. Anecdotally, Shelter Tas understands that many Tasmanians are now living in extremely overcrowded conditions, facing amplified stress and uncertainty about what the future may hold for them. This includes people living on student and working visas, and families 'doubling up' to share a home designed for fewer people, when they cannot afford the difficult and competitive rental market.

In Tasmania, we have seen some families and households who, for the first time, are unable to afford their mortgages and rents. It is likely, therefore, that during FY 2022-23, and beyond, more households and families across Tasmania will find it harder to afford the homes they need. Tasmania has a high proportion of people receiving social security payments and Tasmanian workers also earn lower wages than the Australian average. The average weekly ordinary time earnings for an adult working full time are \$216.40 lower in Tasmania than the national average. (Tasmania: \$1520.70, Australia \$1737.10, ABS stats for May 2021).⁷

The vital task for Tasmania is to ensure an adequate supply of affordable housing for renters on low and moderate incomes. To do this we need to build more dwellings, to a target of 10% of housing stock as affordable and social housing (approximately 10,000 additional properties). We also need to enable these homes to be delivered in all neighbourhoods, regions and communities across Tasmania, and overturn misguided community resistance based on outdated 'Not in My Back Yard' (NIMBY) attitudes. And we need to innovate to identify more ways of increasing the supply of residential properties to ensure all Tasmanians have the homes they need.

Our submission outlines how we can work with our sector and partner with the State Government to assist Tasmanians facing homelessness and housing hardship, and to strengthen the housing and homelessness sector as it adapts to Tasmania's dynamic housing environment and the evolving policy and reform landscape. Our recommendations are designed to deliver both social and financial benefits, such as reducing costs in areas such as health and justice. Housing hardship and homelessness are costly and burdensome to the Tasmanian community - housing is the necessary foundation for health, social wellbeing and economic participation, so improving the housing system for those most in need will deliver substantial overall economic benefit to the state.

Our detailed recommendations are presented in two sections, looking first at strategic directions and then at service improvements and system gaps.

⁷ <https://www.abs.gov.au/statistics/labour/earnings-and-work-hours/average-weekly-earnings-australia/latest-release#state-and-territory>

SECTION 1

1. A 10% target for social housing

The priority ask for this year's Budget Submission continues to be further investment in new, well-located supply of social housing, currently at a level of approximately 6.2% of dwellings in Tasmania. This is urgently needed to arrest the growing hardship experienced by many Tasmanians - as demonstrated by research, data and the evidence of our member organisations - with the hardship amplified by the effects of COVID-19.

Tasmania's deepening shortage of affordable and social housing has serious implications for the people and families affected by insecure housing and homelessness, and for the Tasmanian community as a whole. With persistently high levels of unemployment and underemployment, it will be harder for more and more working Tasmanians to find a home they can afford. Many low income and vulnerable Tasmanians will be left further behind, facing poverty and hardship, and be at risk of becoming homeless.

Affordable, appropriate and secure housing underpins our economy's ability to attract and retain a skilled workforce. The shortage of affordable rental housing directly undermines our community's health, education and overall wellbeing.⁸ Addressing this shortage will deliver a boost for health, employment and community building across the state. Data from Homelessness Australia shows a shortage of affordable social housing in all Tasmanian electorates.⁹

Shelter Tas welcomes the significant investment by the Tasmanian Government in the initiatives under the *Tasmanian Affordable Housing Strategy 2015-25* (TAHS) and we will continue to support the implementation of the second Action Plan. However, since the commencement of the TAHS in 2015 the housing situation in Tasmania has changed dramatically. Data consistently shows that housing stress in Tasmania is an increasing problem and that demand for social housing is growing much faster than supply.

We call on the State Government to set a percentage-based target for affordable social housing, as part of the long term 20 year *Tasmanian Housing Strategy*. There are excellent models available, such as the Social Housing Acceleration and Renovation Program (SHARP), which shows the benefit of social housing both to employment and to meet the community's need for affordable rental housing.¹⁰ The *National Plan for Affordable Housing* by the Community Housing Industry Association (CHIA) sets targets to guide investment and action over the next decade to meet projected need.¹¹

Recommendation 1: Shelter Tas recommends a medium-long term target for Tasmania of 10% of dwellings to be affordable social rental housing, with a yearly aim of delivering at least 1000 additional affordable homes.

⁸ Productivity Commission (2016) *Productivity Commission Study Report, Overview Study Report*, Canberra, November 2016 accessed 5/12/16 at: <http://www.pc.gov.au/inquiries/current/human-services/identifying-reform/report>

⁹ <https://everybodyshome.com.au/heat-maps/>

¹⁰ <https://www.communityhousing.com.au/wp-content/uploads/2020/05/SHARP-Program.pdf>

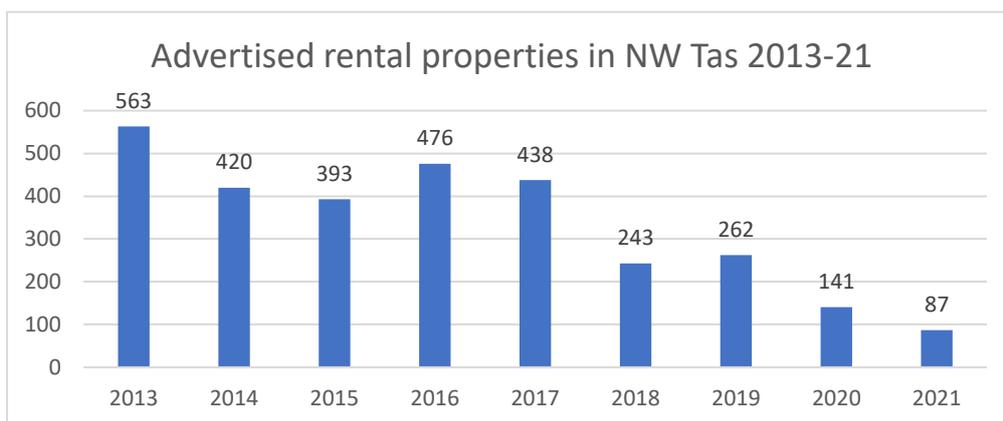
¹¹ <https://www.communityhousing.com.au/national-plan/>

2. A Housing Impact Analysis and Housing in All Policies approach

The cost of housing in Tasmania, including both purchase and rental, is rising much faster than people's incomes, leaving more and more households in rental stress and facing the risk of homelessness. In 2021 the Anglicare Rental Affordability Snapshot found only 729 properties advertised for rent across Tasmania, in contrast to 2677 properties in 2013. In Tasmania's Southern region, which includes Hobart, there were only 433 properties advertised as available for rent in 2021, compared with 1304 in 2013.¹²

The now entrenched shortage of affordable rentals is affected by many factors, including reduced supply as residential properties are converted to short stay accommodation in all regions of Tasmania.¹³ At the same time Tasmania's population is increasing, and house prices are surging while home ownership rates are declining.¹⁴ This means people are renting for longer before being able to purchase a home, and higher proportions and greater numbers of people will be life-long renters.

We know that pressures on the private rental market are extreme in all regions of Tasmania, even those that were traditionally the cheapest to rent are now becoming unaffordable. For example, the graph below adapted from Anglicare Rental Snapshot 2013-21, shows an 84% decline in advertised rental properties in North West Tasmania since 2013.¹⁵



Population, employment, and tourism are some of the policy areas that affect demand for, and use of, Tasmania's residential accommodation. Health, education, and Justice all are impacted when people cannot find or afford the homes they need. All policy areas can have a bearing on housing and a 'Housing in all Policies' approach is the best way to recognise and manage these impacts. A Housing in all Policies approach would ensure that Tasmania's COVID-19 response includes analysis and appropriate planning for Tasmanians who are not currently in safe and secure homes, and in Shelters and Supportive Accommodation environments that are not suitable for Hospital at Home.

¹² <https://www.anglicare-tas.org.au/research/anglicare-tasmania-rental-affordability-snapshot-2021/>

¹³ <https://cbos.tas.gov.au/topics/housing/short-stay-accommodation-act>

¹⁴ <https://www.corelogic.com.au/reports>

¹⁵ <https://www.anglicare-tas.org.au/rental-affordability-snapshot/>

Recommendation 2: Shelter Tas calls for an integrated and comprehensive Housing in All Policies approach that recognises housing as essential infrastructure, and includes a Housing Impact Analysis for all relevant policies.

3. A Women's Housing Strategy

The *Tasmanian Women's Strategy* commenced in 2018. In 2021, however, Tasmania still lacks a specific housing strategy for women. Shelter Tasmania recognises housing affordability, family breakdown, family and domestic violence, lower incomes and ageing as particular issues impacting the housing security of women and girls, including all people from LGBTIQ+ communities who identify as being part of this cohort.

It is essential to recognise that many women may have a home, but that home is not a safe place to be. This forces women and children into unsafe situations.

Domestic and family violence makes a woman's home the least safe place she can be, and getting to safety often means finding somewhere new to live. But a lack of available social and affordable housing drives many women to return to their perpetrators and the risk of violence, or into homelessness.¹⁶

Tasmania's worsening housing crisis has disproportionate impacts on women. Data from Tasmania's system of Specialist Homelessness Services shows there were 5 279 unassisted requests from men, and 13 934 unassisted requests from women – more than twice as many. The proposed *Tasmanian Housing Strategy* currently under development will need a specific strategic focus on issues around women and housing availability, cost, safety and security.

Recommendation 3: *A specific housing strategy for women, and dedicated funds within the implementation of the Tasmanian Women's Strategy, the Tasmanian Affordable Housing Strategy and Tasmanian Housing Strategy to deliver specialised housing that meets the particular needs of women, including specialist family violence shelters.*

4. Adequate support for existing tenants whose NRAS subsidy is ending

When the National Rental Affordability Scheme (NRAS) scheme ends Tasmanian tenants will face a highly competitive and challenging private rental market in which rents have surged in recent years. To achieve or maintain housing stability in this environment, some will need additional assistance and support. Data indicates 128 exits from NRAS in Tasmania in 2020, 300 exits between 2021 and 22, over 300 in 2024 and nearly 600 in 2026.¹⁷ In the context of Tasmania's highly competitive and expensive private rental market a subsidy or other support will be needed to avoid housing hardship and homelessness as the NRAS scheme reaches its end. While some NRAS tenants are eligible for transition to the Private Rental Incentive Scheme, others will not be eligible, and a safety net for these tenants is needed.

Recommendation 4: *Review the expiring NRAS, and ensure tenant impacts are well managed.*

¹⁶ http://everybodyshome.com.au/wp-content/uploads/2021/07/EE_Women-Housing_Domestic-Violence_WEB_SINGLES.pdf

¹⁷ <https://www.communityhousing.com.au/post-nras/>

5. A project to change the NIMBY response to YIMBY – Yes in my backyard

The NIMBY (Not in My Back Yard) response has become a regular feature of community discussions about affordable and social housing initiatives in Tasmania. This response is often based on outdated myths and stereotypes, and attitudes that are not grounded in evidence.

NIMBY attitudes are becoming so prevalent they can delay and even derail proposals for much needed affordable housing. A multi-tiered approach is needed to challenge and change these misguided assumptions.

Shelter Tas proposes to join in partnership with government and other stakeholders to change the conversation around affordable and social rental housing. The partnership would include community housing providers, TCCI, HIA, Master Builders and other stakeholders, working with Shelter Tas and the State Government to target stigma and tell positive stories about the benefits of inclusive neighbourhoods. Tasmanians will all benefit when everyone has a safe, secure, affordable and appropriate home, and to achieve this we need to foster a YIMBY (Yes In My Back Yard) attitude across the state.

The *Changing NIMBY to YIMBY* Project would include:

- Consultation to better understand and respond to local community concerns;
- Benchmark with other states and territories on their responses to the challenge of NIMBYism;
- Develop a toolkit of resources to engage local communities and support the construction of social housing; and
- Dispel the myths about inclusive housing, using a communications program led by Government to encourage a change in the narrative to one of welcoming the benefits of inclusive, diverse and vibrant neighbourhoods.

Recommendation 5: *Shelter Tas recommends investment in a 24-month project in partnership with Shelter Tas for the **Changing NIMBY to YIMBY** project.*

Cost: *\$300 000 (indicative) over two years, a detailed business case can be provided on request.*

SECTION 2

Specialised Recommendations

Our expert members in the housing and homelessness sector advise us that Tasmania is seeing an increase in both houselessness (people who only need a house) and homelessness (people who require specialised support to help them gain and maintain a safe and stable home). It is important to understand and respond to the different needs of these groups as we strive to achieve safe, secure, affordable and appropriate housing for all, and an end to homelessness.

Our targeted consultation with members, including our annual member survey, has identified particularly urgent gaps for certain cohorts and regions. Addressing these needs will complement and add to the value of the *Tasmanian Affordable Housing Strategy 2015-25*, and *Action Plan 2019-23*. The additional funds needed by these initiatives could be drawn from Housing Debt waiver funds, cost savings, or shared budgets in other areas such as health and justice. The initial cost of increasing the stock of affordable housing and reducing homelessness and housing hardship is an investment that yields economic return in areas such as health, education and social engagement. Our consultation also identifies positive opportunities for innovative projects and for ways to enhance the private rental conditions experienced by tenants.

6. Develop a suite of innovative housing options to meet people's needs and improve use of space through density and infill projects

In Tasmania's ongoing housing crisis we need to explore additional ways to address the chronic shortage of affordable rental housing.

The 2019 Report *Towards infill Housing Development* provided to the Department of State Growth notes the "increased demand for well-located, affordable housing within the State's urban centres."¹⁸ The Report also notes:

A lack of affordable housing has the greatest impact on vulnerable groups within society, who are least able to access the private housing market. This includes people on low or fixed incomes and long-term renters. These groups form a high proportion of households across Tasmania. (P 20)

To develop additional innovative housing options in response to Tasmania's ongoing rental crisis, Shelter Tas recommends immediate investment in demonstration projects for new redevelopment and urban renewal projects such as shop top accommodation. To further explore alternatives to traditionally built homes Shelter Tas recommends establishing and facilitating stakeholder groups to explore housing innovations, and identify innovative community-based solutions to housing need, in line with Housing Connect Reforms. These forums would include UTAS, LGAT, TCCI, HIA, Master Builders, and would include user perspectives, financing options, and planning pathways towards infill, inclusionary zoning and improved density.

¹⁸https://www.stategrowth.tas.gov.au/data/assets/pdf_file/0019/216172/Toward_Infill_Housing_Development.pdf P3

Recommendation 6a: Shelter Tas recommends commissioning a project to re-imagine and revisit new and innovative options to deliver more affordable and well-located housing options, such as shop top accommodation, retrofit offices and infill housing. Project outputs would include regional forums, a report and recommendations for pilot projects and initiatives.

Recommendation 6b: Shelter Tas recommends a grant program to fund and showcase well-designed affordable shop top accommodation, and use of vacant office space or other well-located space targeted at low and moderate income renters and social housing tenants.

7. Measures to enhance investment in Community Housing

Tasmania's important and national best practice commitment to social housing, including the Community Housing Growth Program, will be enhanced by a focus on efficiency gains in planning, utilities, and procurement processes. Shelter Tas has received feedback from our Community Housing Industry Association (CHIA) members that other states are offering better incentives to Community Housing Providers (CHP) to build new properties and support tenants. For example, Victoria contributes 65% building cost while Tasmania contributes only 40%. Victoria also offers operational subsidies.

Reviewing interstate benchmarks will ensure CHPs are adequately and competitively funded in Tasmania, will help to secure ongoing stability and growth in our community housing sector. The following areas show the greatest potential to improve efficiency:

- (i) Review funding levels for community housing in other jurisdictions to benchmark Tasmania's funding models and ensure best practice.
- (ii) Enable Local Government and the State Planning System to develop a permitted use pathway for not-for-profit community housing development that allows appropriate variation for social rental properties, such as fewer required parking spaces, as well as maintaining quality standards.
- (iii) Review and streamline the timeframes and flow of tenders and approvals for new builds to maximise efficiency in the current government procurement processes.
- (iv) Work with community housing providers, LGAT, TasWater and TasNetworks to implement an expedited and less costly process for affordable housing projects to connect utilities, and achieve approvals from local governments.
- (v) Ensure that inclusionary zoning is a priority in the reforms to Tasmania's planning system.

Recommendation 7: Convene an expert group of stakeholders, including community housing providers, to implement the above initiatives and recommend additional ways to expedite social housing planning and delivery.

8. Ongoing, recurrent funding for the Safe Space model

The Safe Space model is now operating in all three regions of Tasmania, supporting people in Hobart, Burnie and Launceston. This program provides a low barrier option for people needing emergency shelter focussing on rough sleepers, and has demonstrated successful outcomes, with most clients engaging with health and medical support, and some finding longer term safe and secure housing. Safe Spaces have become a valuable and vital part of Tasmania's system of Specialist Homelessness Services and needs to be supported with ongoing funding through the forward estimates.

Recommendation 8: *Deliver funding security with recurrent five-year funding (to match other Specialist Homelessness Services) for Safe Space shelters through the forward estimates.*

9. Address the additional cost burden for Shelters to maintain a safe environment for children/young people and implement their legal responsibilities under the Organisational Liability for Child Abuse legislation

The *Justice Legislation Amendment (Organisational Liability for Child Abuse) Act 2019* (the Act) came into effect on 1 May 2020. The Act increases legislated responsibilities and requirements for organisations providing services to children and young people to ensure the safety of children in their care, and manage the risk of child abuse from any person associated with the organisation and its activities. To manage the increased liabilities stipulated by the Act means additional reporting, record keeping and administration, change to staffing and recruitment practices and policies, and arguably a change to one worker models, to eliminate the potential for unobserved one-one interactions between adults and children (for example, within a youth service funded on the basis of a one worker model or during transport in a car). This focus on safety and risk management will impose additional costs on Specialist Homelessness Services who assist accompanied and unaccompanied children and young people.

Initial costs will likely include material resources and environmental change, updates to policies and procedures, and changes to recruitment and personnel practices. There will be additional ongoing costs due to the administrative burden to maintain records, implement best practice and continuous improvement and the like.

The national program of Ten Child Safe Principles is likely to be legislated in Tasmania in the near future, and will provide additional guidance to services to ensure safety of children. This will also require adjustments involving some costs.

Recommendation 9: *Review the additional cost burden for Specialist Homelessness Services due to current and upcoming child safe legislation and allocate additional funds as appropriate.*

10. Mental health and alcohol and other drug (AOD) support

Shelter Tas members report an urgent and escalating need for appropriate mental health pathways for people in crisis accommodation.¹⁹ More people with higher and more complex needs are presenting at Shelters. Shelter Tas is extremely concerned about the growing risk to clients and workers. The situation reflects both a lack of resources and the lack of integration between mental health and housing/homelessness services. A clear response pathway that delivers appropriate support for clients and workers is needed urgently.

Young people, in particular, deserve access to therapeutic models that are appropriate to their needs. Tasmania still lacks a dedicated child and adolescent in-patient mental health unit, which is clearly needed to deliver care in an appropriate setting to young people who require this clinical response. Young people also need appropriate rehabilitation options that will enable them to

¹⁹ Currently, as many shelters have a 'one worker model' if a client is in extreme distress, self-harming, or displaying behaviour suggesting acute mental ill-health, the only option is to call for police or an ambulance. The expense and disruption of emergency service call-outs could in many cases be avoided if early intervention and support were in place.

address alcohol and other drug challenges, including appropriate residential rehabilitation and aftercare that meet their needs.

The current Mental Health Outreach Support Team MHOST provides essential service to people who are hard to reach but can benefit greatly from mental health support. Shelter recommends expanding this role to all regions of the state, and ensuring ongoing funding for this important service, including additional outreach to all Shelters.

We note the successes already achieved by the Housing and Accommodation Support Initiative (HASI) pilot in the south, where people experiencing significant mental health challenges are supported to sustain their tenancies. We encourage the State Government to consider fast-tracking a similar program for the north and northwest. This investment not only benefits tenants, who are able to maintain housing security and receive the mental health care they need, but also saves money through the decreased need for acute care and for additional housing and homelessness services that are needed if a tenancy is not sustained.

We recognise the success of the Rapid Rehousing program that delivers secure homes to people who are exiting inpatient mental health care. We would like to see this program extended to support people in additional locations, and delivered with a Housing First approach. We also understand from members that there would be benefit in extending the duration of stay, currently limited to 12 months. When people are living with mental health challenges, the stress of housing insecurity can worsen their illness. Chronic conditions may not be stabilised within one year, and an expectation to relocate after 12 months may be detrimental to the person's health and recovery. We would like to see a long-term approach to secure homes for people in this program, at least two years, and ideally for as long as the person needs this supportive and stable environment.

Recommendation 10a: *Renew and expand the role of the Mental Health Outreach Support Team MHOST.*

Recommendation 10b: *Extend the duration of stay for tenants with mental health issues accessing the Rapid Rehousing program to at least two years, and preferably for as long as needed.*

Recommendation 10c: *Use the opportunities in the Housing Connect Reform to deliver better integration between housing and mental health and AOD services, especially for young Tasmanians.*

Recommendation 10d: *Expand the HASI program to all regions of Tasmania.*

11. Improve housing outcomes for younger Tasmanians

Young people are particularly disadvantaged in Tasmania's competitive and expensive rental housing market due to lower incomes, discrimination and lack of rental history. Young people are overrepresented in the Specialist Homelessness Service system, and on the waiting list for social housing.

Homelessness disproportionately affects young people and children (52% of all homelessness services clients).²⁰ The ABS 2016 Census reported that 38% of homeless Tasmanians are less than 25

²⁰ See Shelter Tas Fact Sheet *Housing in Tasmania* <https://www.shelbertas.org.au/>

years old; nearly half couch surf or are in severely overcrowded housing.²¹ Young Tasmanians make up one third of the social housing waiting list.

Providing more affordable rental housing, increasing the housing options for young people, and securing the support needed to help them learn how to live independently are effective measures to avoid and reduce homelessness. To be successful, options for young people need to be developed in consultation with the community sector. Ongoing operating funds need to be guaranteed. We note the effectiveness of the Northern Youth Accommodation Coalition (NYAC) model, and call for similar options to be developed in the south of the state.

Young people who depend on Youth Allowance as their sole source of income, and other people on extremely low incomes (for example, single people who are receiving JobSeeker Allowance), present significant challenges for social housing providers. This is due to the unviability of the income-based rent model for these cohorts. Most on this income stream are ineligible for Commonwealth Rent Assistance, which even further impacts Community Housing Providers in their ability to run a self-sustaining business given the costs associated with construction, maintenance and a supportive housing model of service. It is increasingly difficult to cross-subsidise these tenants, due to the allocation models that require a focus on priority allocations i.e. generally tenants with more complex needs. Should government continue to require a focus on housing youth in particular, an additional supplement is needed in order to bridge the gap between service delivery and rental for this group.

While young people are in youth emergency accommodation shelters, they are currently supported by a one worker model overnight. Shelter Tas recommends a review of the one worker funding model in youth shelters, with consideration given to double staffing, especially overnight.

Shelter Tas welcomes the additional support for young people through Youth to Independence (Y2I) facilities and cluster homes. In addition, we recommend the following.

Recommendation 11a: *Develop a rent subsidy model for young people on extremely low incomes living in social housing.*

Recommendation 11b: *Extend transitional housing options such as the NYAC and YFCC models to other regions (up to one year accommodation with support).*

Recommendation 11c: *Maintain a suite of options for young people experiencing or at risk of homelessness in addition to Youth to Independence (Y2I) services.*

Recommendation 11d: *Review the 'one worker model' in youth emergency accommodation. This work could be undertaken in scope of current Communities Tas operations, and Shelter Tas would be happy to assist with consultations.*

12. Family Violence Rapid Rehousing – continue funding

Rapid rehousing for people escaping family violence is a vital resource to keep women and their children safe. It is important to provide housing security for people so that they can stabilise their lives. A Housing First approach is the best way to deliver this. Where appropriate, this may require

²¹ https://sheltertass.org.au/wp-content/uploads/2019/11/ST_FACT-SHEET_Homelessness-v5_Oct2019.pdf

additional time in their home, to avoid the disruption of further relocations. We recommend continuing to fund this program and reviewing the duration of stay to ensure people have the stability they need.

Recommendation 12: *Continue to fund the Family Violence Rapid Rehousing program, expand the number of properties available and extend duration of stay.*

13. Refund the expiring Private Rental Incentives Scheme and continue to fund the additional places allocated in the COVID-19 response

14. Improving housing outcomes for older Tasmanians

Nearly one in five people seeking assistance from Tasmania's homelessness services are aged over 55. In the 2016 Census older people experiencing homelessness were growing both as an absolute number and as a proportion of Tasmanians experiencing homelessness.²² Older single women are particularly vulnerable, due to having lower levels of income and assets.²³ Shelter Tas welcomes the progress of the Wirksworth model in the south. This is based on the Wintringham model, which can draw on the aged care funding stream to support residents. Shelter Tas encourages the State Government to deliver similar accommodation for older men and women in the greatest need in the north and northwest regions.

COTA and Shelter Tas recognise that there is a growing group of older Tasmanians reaching retirement years without owning their own home, and therefore facing increased housing insecurity and hardship. Shelter Tas and COTA propose a research project into how best to meet the needs of this cohort. For instance, a variation to the Homeshare model, or other shared equity models, could be designed for older clients. Current models available in Tasmania can exclude older people due to criteria such as bank loan eligibility and higher – though still modest – assets.

There is no dedicated housing response for who have experienced elder abuse and do not have a safe home, as this group is not included in the family violence response. Some estimates have suggested that 3-5% of the population – 3000 to 4500 Tasmanians – experience elder abuse each year. There is an urgent need to develop appropriate housing solutions to address this gap. Not all of these cases would require housing assistance, but an approximate number of 5-10% would amount to 150-450 places statewide. A response could be modelled on the Rapid Rehousing program for survivors of family violence, noting that the homes would need to be appropriate, likely two-bedroom dwellings that would suit a single person, with age friendly characteristics such as accessible design for a person with low or changing mobility.

Recommendation 14a: *Develop appropriate housing solutions for Tasmanians who are escaping from elder abuse.*

Recommendation 14b: *As the Tasmanian population ages it is essential to look to future needs. Shelter and COTA jointly recommend two projects to support ageing in place for tenants and home owners.*

²²http://www.shelbertas.org.au/wp-content/uploads/2018/03/2018-03-20-ST_FACT-SHEET_Homelessness-2016-Census.pdf

²³ See, for example, *The Time of Our Lives Report* <https://www.lmcf.org.au/images/2016-Time-of-Our-Lives-Report-LMCF.pdf>

- *Shelter and COTA Project to recommend incentives for landlords to support older Tasmanians to remain in their homes, with strategies such as to modify properties and to encourage long term leases (5-10 years).*

Project officer (Auspiced by Shelter and/or COTA), three regional stakeholder forums, Report and recommendations, ongoing community of practice.

Indicative cost: \$50 000

- *(2) Shelter Tas and COTA Project to recommend best practice options on shared equity models for older Tasmanians to remain in their own homes and/or age in place.*

Project officer (Auspiced by Shelter and/or COTA), three regional stakeholder forums, Report and recommendations, ongoing community of practice, Financial/economic consultant.

Indicative cost: \$70 000

Recommendation 14c: *Shelter Tas recommends the commitment of capital and recurrent funding in the 2022-23 Budget for a Wintringham model for older people who have experienced or are at risk of homelessness for the North and North West regions.*

15. Boost the Rapid Rehousing program for people exiting prison, and establish a Rapid Rehousing program for veterans

Tasmania's Rapid Rehousing for people exiting prison has approximately 12 properties. The need is significantly greater, with over 700 people exiting prison each year. The Beyond the Wire program has established a strong track record in supporting people so they can stabilise their lives, reconnect with family and reduce rates of reoffending. Boosting the program to include a Housing First approach with 50 medium to long term properties is a much needed expansion.

At present, Tasmanian does not have a dedicated rapid rehousing program for Veterans. This is urgently needed, with an initial allocation of 16 properties.

Recommendation 15a: *Expand the Rapid Rehousing for people exiting prison to 50 properties and implement a Housing First approach.*

Recommendation 15b: *Establish a Rapid Rehousing program for veterans of 16 properties.*

16. People on low and zero incomes who are victims/survivors of family and domestic violence

Our members who deliver Specialist Homelessness Services are sometimes called upon to house people who have no income at all. Often people with zero income are victims/survivors of family violence who are on temporary visas. Shelter Tas calls on the State Government to adopt and promote the recommendations of the *Blueprint for reform - removing barriers to safety for victims/survivors of domestic and family violence who are on temporary visas.*

These recommendations have been endorsed by national organisations and organisations in every state, including Warrawee Women’s Shelter, Engender Equality and Women’s Essential Services Providers (WESP) in Tasmania.²⁴

While some *Blueprint* recommendations are outside the State Government’s remit, others - such as enabling eligibility to access social and public housing and SHS services - could be implemented in Tasmania (South Australia already allows women on temporary visas to access social and public housing²⁵). We note that as services rely on income-based rents, a funding supplement may be needed to manage the financial impact on the shelter. For the full list of recommendations for victims/survivors of domestic and family violence who are on temporary visas, please see <https://aifs.gov.au/cfca/2019/10/29/blueprint-reform-removing-barriers-safety-victims-survivors-domestic-and-family-violence>

Shelter Tas is pleased to acknowledge that the COVID-19 domestic and family violence initiatives were made available to people on temporary visas with zero income.

Recommendation 16: *Shelter Tas recommends the State Government endorses and implements where appropriate all the recommendations from the Blueprint for Reform - removing barriers to safety for victims/survivors of domestic and family violence who are on temporary visas.*

17. Tasmanians with a disability

The Disability Accommodation Multiplier Program (D-vAMP) aims to address systemic barriers to **unlock the potential** of underutilised public, community and private assets by **enabling innovative models** which have a multiplying effect on addressing the priority housing waitlist. The Disability Accommodation Multiplier Program (D-vAMP) will improve housing options for people with disability while also unlocking the potential to better utilise existing social, community and sector or Director-owned housing and land. A taskforce comprising government, housing and disability sector representatives, with a funded resource to support the Taskforce coordination and deliverables will be set up to identify underutilised disability housing and to facilitate and accelerate transition from inappropriate housing to target housing developments that already planned or underway.

People with disability have been accessing a greater proportion of public and community housing resources since the transition from institutional settings in 2000. Many of the people who moved from institutional settings are living in larger tenancies (5-6+ bedroom) in older style housing situated on large blocks.

Whilst an emerging SDA market has seen people with very complex and high physical needs (only 6 per cent of people living with disability in the NDIS) attract funding for specialised housing, most adult people with disability live in public or community housing or with their ageing parents. An increasing number are living in private rentals retained and subsidised by disability service organisations who cannot provide supports without a safe place to do so. This is an unsustainable arrangement.

²⁴ Warrawee is a member of Shelter Tas, and Shelter Tas and Warrawee are both members of WESP in Tasmania.

²⁵ <https://aifs.gov.au/cfca/2019/10/29/blueprint-reform-removing-barriers-safety-victims-survivors-domestic-and-family-violence> p 7.

The fundamental shift to how disability supports are funded and regulated has seen a significant change in the demand and utilisation of public, community and private housing assets. A large proportion of properties are not fully utilised and are no longer fit for purpose, despite being well located and on large blocks. Most properties have gardens which are paid to be maintained but very few are used.

Some public, community and private housing assets remain empty while disability providers market their disability services. For example, across 26 community housing properties with Possability residents there are currently 10 vacant bedrooms, reflecting a bedroom utilisation of 83 per cent. That means there is the potential for nine properties to be reutilised if the residents are given the choice of moving into more appropriate smaller properties. This suggests that across the disability services sector hundreds of properties have the potential to be reutilised.

NDIS participants are increasingly seeking smaller more independent options like units and apartments which can and should be co-located with members of the broader community. However, transition between existing models to more appropriate community housing models do not occur due to existing residents not triggering high risk status. Even those on the waiting list do not have their needs met because there is insufficient supply – partly due to the lack of suitable and appropriate land. Furthermore, it is difficult for the State Government to quantify the supply and demand profile of the changing group as this information is held by multiple disability service providers.

Proposal:

The outputs of the program would be to:

- map supply and demand for housing for people with a disability across public, community and private assets to identify inefficient and unsuitable housing
- establish and maintain a government, housing and disability sector taskforce to facilitate and accelerate transition between inappropriate housing to target housing developments already planned or underway (MULTIPLIER 1: inappropriate stock currently underutilised is exchanged for more appropriate stock, immediately releasing current stock for other groups on the priority waitlist)
- build capability with the disability sector, government housing organisation, community housing organisations, advocacy groups and people with a disability sector to encourage development of options that meet the needs of and are preferred by people with disability) (MULTIPLIER 2: greater and more suitable options for people with disability in community housing developments lead to addressing people with disability numbers on priority waitlist)
- identify and demonstrate innovation projects to redeploy existing property to either higher utilisation or higher density options (MULTIPLIER 3: Density and utilisation of property is increased through infill and innovative models).

The resource needed is a coordination role to support this work.

Indicative cost: \$150 000/annum for two years.

Recommendation 17: Commit funding for the Disability Accommodation Multiplier Program (D-vAMP).

18. Improving conditions for tenants in the private rental market

Renting in the private rental market is no longer just a short-term option. More people are renting for longer time. More than 40% of Tasmanian renters spend over 10 years in the rental market.²⁶ The recent Choice report *Disrupted: the consumer experience of renting in Australia* reveals the lack of consumer protections. Despite paying thousands of dollars each year, tenants face unsatisfactory conditions and are often too afraid to complain. In this context it is crucial to maintain a well-functioning system that protects both tenants and landlords, and enables people who rent their homes to lead healthy, safe and productive lives.

Shelter Tas calls for a refresh and reset for the regulation of the private rental market. As more people are renting for longer renting is no longer a transitional tenure. Tasmania has an opportunity to refresh the regulatory and cultural framework for private rental to ensure it is better adapted to the contemporary environment. This would include a review of the regulation of short stay accommodation, to ensure that the permit system delivers sufficient funds to ensure appropriate monitoring and compliance with permits and exemptions and that local decisionmakers are empowered to make place-based decisions to balance short stay visitor accommodation with the needs of local workers and residents for appropriate rental accommodation.

Shelter Tas is ideally placed to consult key stakeholders and deliver a report with recommendations to help modernise the Residential Tenancy Act and improve the tenancy security of all Tasmanians in private rental housing. This would assist Tasmania to align with best national practice on matters such as exemptions from the RTA, pets, digital rights, energy efficiency and emerging disruptive technologies such as apps for tenants and landlords.

Recommendation 18a: *Consultation to support the continuing improvement of the Residential Tenancy Act.*

Cost: \$30,000 (indicative) for Shelter Tas to undertake statewide consultation and deliver the Report.

Recommendation 18b: *Additional resources for the Residential Tenancy Commissioner to ensure effective monitoring and enforcement of the Residential Tenancy Act, and to enable the Commissioner to undertake proactive inspections to ensure compliance with the minimum standards.*²⁷

Recommendation 18c: *An audit of the funds held by the Residential Deposit Authority to ensure transparency about the holdings and uses of bond money, and the introduction of an Annual Report showing how these funds are allocated to the benefit of tenants.*

Recommendation 18d: *Adequate funding for the Tenants' Union of Tasmania in the Forward Estimates to ensure a sustainable model for legal representation of tenants across the state.*

²⁶ Choice, NATO and National Shelter *Disrupted: the consumer experience of renting in Australia* 2018 <https://www.choice.com.au/money/property/renting/articles/choice-rental-rights-report-dec-2018>

²⁷ We note that this is an increasingly pressing issue, and the lack of enforcement of standards has significant negative impacts on tenants. See for example: <https://www.theadvocate.com.au/story/7080102/few-fines-for-landlords-man-left-homeless-as-repairs-refused/>

Recommendation 18e: Fund the Residential Tenancy Commissioner to implement an exit survey for renters and landlords on reclaiming bond money. The survey could be modelled on the NSW renter exit survey.

19. Standards for specialist and supportive accommodation

Some properties in the SHS and SAF sector are new and purpose built, others are older buildings, with some repurposed from other dwellings or legacy uses. Many services are not covered by the Residential Tenancy Act Minimum Standards. There is an opportunity to work towards appropriate standards for both the built environments and for staffing levels, noting that these could apply immediately to new builds and could be introduced incrementally for existing legacy properties.²⁸

Recommendation 19: Shelter Tas recommends reviewing the minimum standards for Specialist Homelessness Services and Supportive Accommodation Facilities used in other jurisdictions in order to develop appropriate standards for Tasmania.

20. Shelters to include options for accommodating pets

For many people, pets form an essential part of family, and play a vital role in people's health and wellbeing. This is particularly true for children. It is well known that threats from perpetrators to harm family pets are a barrier to families leaving violent and abusive situations. The lack of an option to care for a pet is also a barrier to people seeking emergency accommodation, which places people at higher risk, imposes additional stress and worry, and prevents people finding assistance. Pets can help people manage the effects of trauma, and need to be included in trauma-informed responses.

Recommendation 20: Shelter Tas recommends that pet friendly options should be developed and funded for all shelters, and pet accommodation be included in any new purpose-built shelters.

21. Explore energy efficiency measures

After paying for rental and housing costs, energy bills are the hardest household cost for people to manage. The latest PowerHousing Australia *Australian Affordable Housing Report* points out that "Australian social housing stock is often old, less efficient and costly to run with impacts on economic and social wellbeing for those that can afford it least."²⁹ Tasmania has an opportunity to improve the energy efficiency of new and existing homes, to also contribute to the achievement of net carbon zero by 2050.

Recommendation 21: Shelter Tas recommends reviewing options to improve energy efficiency and enhancing support for people experiencing energy hardship.

22. Consumer participation

Consumer participation is a vital element of all service delivery and of the Housing Connect Reform that is currently underway. The incorporation of lived experience and expert voices in the Housing Connect Reform and Tasmania's ongoing housing and homelessness service system will result in better quality and more appropriate policies, programs and practices being designed and

²⁸ <https://opus.lib.uts.edu.au/handle/10453/141416>

²⁹ <http://www.powerhousingaustralia.com.au/wp-content/uploads/2021/11/PHA-eScan-2021-FINAL.pdf>
see p 4, 63.

implemented. Ultimately, consumer participation leads to better outcomes for people experiencing homelessness and housing crisis.

While many housing and homelessness services already have systems in place to incorporate consumer participation and voice, the situation across all organisations in the state is not uniform. There is a clear opportunity to develop best practice statewide, drawing on the work undertaken previously by Shelter Tas in developing consumer engagement guides.³⁰ Shelter Tas is well placed to assist all services to develop and implement a consumer participation, and to establish and host an advisory group to ensure this work is well-aligned with the Reforms.

Recommendation 22: *Commit sufficient funding to plan for and implement an effective statewide Consumer Participation program for the Housing and Homelessness Sector.*

Cost: *A business plan can be provided on request. Indicative cost would be approximately \$300 000 over two years.*

23. Equal remuneration and adequate indexation for the community sector

Shelter Tas is aware that the Tasmanian Government has committed to funding the ERO for Specialist Homelessness Services in 2021-22, including the \$1.8 million shortfall from the Commonwealth Government. At this time, however, there is uncertainty over funding beyond 2022 for the final year of the current NHHA, and for future agreements.

Recommendation 23a: *Shelter Tas seeks confirmation from the State Government that it will:*

- *provide adequate funding beyond the forward estimates to meet its obligations as stipulated by the ERO;*
- *confirm that the ERO will be incorporated into base funding for all relevant organisations; and*
- *make up any shortfall if the Federal Government does not fund the ERO for housing and homelessness services.*

Recommendation 23b: *Shelter Tas seeks confirmation from the State Government that it will*

- *link future indexation to CPI and annual wage increases, including superannuation increases.*

CONCLUSION

This submission to the 2021-22 State Budget Process from Shelter Tas presents strategic proposals to deliver safe, secure, affordable and appropriate housing for all Tasmanians who are homeless, at risk, or in housing hardship. We recommend systemic strategic initiatives that will ensure Tasmanians in all regions, regardless of their income, can access the housing they need to stay safe and well, throughout and beyond the pandemic.

Our proposals will strengthen Tasmania's social fabric and support our economic recovery.

Contact ceo@shelertas.org.au

³⁰ <https://shelertas.org.au/training/guides/>