



23rd July 2021

Independent Panel of the Social Housing Regulation Review
c/o Old Treasury Building
20 Spring St
East Melbourne 3002
Via email submission to info@shrr.vic.gov.au

Dear Independent Panel of the Social Housing Regulation Review,

RE: Social Housing Regulation Review – Consultation Paper 1

Domestic Violence Victoria (DV Vic) and Domestic Violence Resource Centre Victoria (DVRCV) welcome the opportunity to contribute to the Social Housing Regulation Review (the Review) and provide a submission in response to the *Background and scoping paper (Consultation Paper 1)*. DV Vic and DVRCV thank the Independent Panel of the Social Housing Regulation Review (Review Panel) for providing background and context for the Review in the first Consultation Paper and for raising relevant issues to the regulation of social and affordable housing in Victoria.

In addition to the matters outlined in Consultation Paper 1, we recommend that a family violence lens is applied during the Review in recognition of the nexus between family violence, housing and homelessness and to ensure that any changes to the regulations do not adversely impact on victim-survivors of family violence. In addition, the voices of victim-survivors of family violence are integral to the Review, and DV Vic/DVRCV recommend that the Review uses best practice principles to genuinely engage with victim-survivors to ensure their voices are reflected in the Review and any subsequent changes in the regulation of social and affordable housing in Victoria. To support these recommendations, we provide additional background information the Review Panel should consider.

DV Vic and DVRCV have merged to form a new peak body for specialist family violence services responding to victim survivors in Victoria. The merge brings together the current peak body for Victoria's specialist family violence services supporting victim survivors (DV Vic) and Victoria's only specialist family violence Registered Training Organisation (DVRCV). As an independent, non-government organisation that leads, organises, advocates for, and acts on behalf of its members utilising an intersectional feminist approach, we are working towards a world beyond family and gender-based violence, where women, children and all people from marginalised communities are safe, thriving, and respected.

We welcome the aim of the Review, which is to 'identify future regulatory arrangements to provide strong resident protection, better information to Victorians and position social housing for growth and transformation over the

next decades'.¹ DV Vic/DVRCV commend the Victorian Government's commitment to ensuring people have a right to safe, suitable and adequate housing that promotes their dignity and well-being. In making this submission, we reiterate our position that investing in social housing is necessary to ensure victim-survivors who leave their homes to escape family violence have somewhere to go. A recent report estimates that '7, 690 women have returned to a current violent partner due to a lack of affordable housing options'.² Investing in social housing would not only bring economic benefits, it would also reduce the number of victim-survivors returning to violent partners due to a lack of affordable housing.³ For example, economic modelling shows that 'building 16, 810 social housing units would reduce the number of women that return to violent partners ... by 7, 690, and deliver a benefit of \$154 million in a single year'.⁴

Recommendation: A family violence lens is applied during the Review and in reforming social housing regulation.

Given that the Review Panel recognises that safe and suitable housing is a basic human need,⁵ DV Vic/DVRCV recommend that a strong and explicit family violence lens is applied in the Review and any resulting reform of the regulation of social and affordable housing. As the recent Parliamentary Inquiry into Homelessness in Victoria (the Inquiry) found, family violence is 'the main reason individuals accessing homelessness services seek assistance in Victoria'.⁶ Family violence is the leading cause of homelessness among children and women in Australia, with victim-survivors constituting 41% of clients presenting at specialist homelessness services.⁷ Women made up 90% of clients who experienced family violence, while half of younger clients (51%) experienced family violence. Homelessness among victim-survivors occurs as a result of experiencing family violence – for example, having to leave the home to be safe from a perpetrator's use of violence.

People who are escaping or have escaped family violence receive priority access for social housing,⁸ so it is likely that a very high proportion of social housing residents are victim-survivors. This is further evidence in support of adopting a family violence lens in reforming social housing regulation. For additional background information on the intersection between family violence, housing and homelessness, we refer the Review Panel to our recent submissions to the [10-Year Strategy for Social and Affordable Housing sector consultation paper](#), the [Inquiry into Homelessness in Victoria](#), and the [Make Social Housing Work Framework](#), which DV Vic and DVRCV are signatory to.

¹ Independent Panel of the Social Housing Regulation Review (Review Panel). (2021). *Social housing in Victoria: Consultation paper 1 – background and scoping paper*. Accessed on <https://engage.vic.gov.au/social-housing-regulation-review>, p.22

² Equity Economics. (2021). *Nowhere to go: the benefits of providing long-term social housing to women that have experienced domestic and family violence*. Accessed on <https://drive.google.com/file/d/1U9xV17Fdy2D-mWCSVN-shrKRbPn4s83p/view>, p.14.

³ *ibid*, p.20.

⁴ *ibid*, p.20.

⁵ Review Panel. (2021). *Social housing in Victoria*, p.3

⁶ Parliament of Victoria. (2021). *Inquiry into homelessness in Victoria final report*. <https://www.parliament.vic.gov.au/lsc/ic/article/4662>.

⁷ AIHW. (2020). *Specialist homelessness services annual report*. Accessed on <https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-annual-report/contents/clients-who-have-experienced-family-and-domestic-violence#Client%20characteristics>.

⁸ Review Panel. (2021). *Social housing in Victoria*, p.10.

Recommendation: The Review applies best practice principles to genuinely engage with victim-survivors of family violence to ensure their voices are included in the review process.

Given that resident voice, resident and community outcomes are included in the Review's Terms of Reference and are one of the focus areas in Consultation Paper 2, it is important that the Review applies best practice principles to genuinely engage with victim-survivors to ensure their voices are included in the review process. The Royal Commission into Family Violence Recommendation 201 stated that the 'Victorian Government and agencies that respond to family violence identify and develop safe and constructive ways to ensure that the voices of victims are heard and inform policy development and service delivery'.⁹ DV Vic/DVRCV refer the Review Panel to the *Family Violence Experts by Experience Framework (The Framework)*,¹⁰ which sets our best practice principles to guide collaborative processes between victim-survivor advocates and service providers. The Framework was developed by DV Vic and the University of Melbourne, with the aim of enhancing the ability of specialist family violence services to provide opportunities for victim-survivor advocates to influence policy change, service planning and practice. The Framework is based on the belief that 'responses to family violence will be most effective and safe if they are informed and developed in partnership with victim-survivors'.¹¹

DV Vic/DVRCV would like to thank the Victorian Government for the recent Big Housing Build, investment in social housing and for undertaking the Review. DV Vic/DVRCV recommend adopting a family violence lens in the Review and implementing best practice principles to ensure that victim-survivor voices are genuinely included. Doing so will make significant positive differences to adult and child victim-survivors. We look forward to contributing to forthcoming consultation papers, working with the Review Panel and the Victorian Government to ensure that victim-survivors can benefit from the Review.

If you have any questions regarding DV Vic/DVRCV's position, please contact me [via](tel:0450081547) phone on 0450 081 547 or email louisessimms@dvvic.org.au or Policy Manager Jennie Child on jenniechild@dvvic.org.au.

Yours sincerely,



Louise Simms

Executive Director, Policy, Communications and Engagement

⁹ Victorian Government. (2021). *Ensure voices of victims are heard and inform policy development and service delivery*. <https://www.vic.gov.au/family-violence-recommendations/ensure-voices-victims-are-heard-and-inform-policy-development-and>.

¹⁰ Hegarty, K., Lamb, K. & Parker, R. (2020). *The Family Violence Experts by Experience Framework: Research Report & Framework 2020*, University of Melbourne & Domestic Violence Victoria. http://dvvic.org.au/wp-content/uploads/2020/08/DVV_EBE-Framework-Report.pdf

¹¹ *ibid*