

## Submission to the Victorian Government Social Housing Regulation Review

27 September 2021

## 1. About the Women’s Housing Alliance EST 2019

The Women’s Housing Alliance (WHA), established in 2019, represents the collective voices of twelve key Victorian service providers, each working to address the chronic housing shortage across the complex spectrum of housing needs for women and children who are escaping family violence and experiencing homelessness at growing rates.

The WHA is a collective impact model driven by the shared agenda for timely, accessible, affordable, safe, and secure accommodation for all Victorian vulnerable women and girls in need. WHA members have a united commitment to gender equity and have signed up to the five conditions of collective impact:

- A common agenda;
- Shared measurement;
- Mutually reinforcing activities;
- Continuous communications; and
- Backbone support.

### OUR FOUNDING MEMBERS

Our members service the needs of thousands of vulnerable Victorian women and children per annum.

Elizabeth Morgan House	Margaret Tucker Hostel	Women’s Housing Ltd
Flat Out	McAuley Community Services for Women	Women’s Health Victoria
Good Samaritan Inn	safe steps	Women’s Property Initiative
Juno	WEstJustice	YWCA Housing

We know that that there is a chronic shortage of appropriate housing stock, and we know that the ‘one size fits all’ approach to housing doesn’t work. We understand the far-reaching implications of intersectionality, when gender inequality is compounded by other forms of disadvantage or discrimination such as: race, Aboriginality, religion, ethnicity, disability, age, sexual orientation and gender identity. We know that safe and secure housing is the fundamental resource that underpins all other essential wrap-around services.

We know that gender specific services are crucial to meeting the specific needs of women headed households and must be recognised, funded, supported, and facilitated to grow.

Our members work 24/7 with the vulnerable Victorian women that make up the following statistics<sup>1</sup>:

- Females make up 63% of unassisted requests;
- 10,034 women aged over 18 are not assisted, and of those women not assisted, the daily average figures are:
  - 25.8 are requests for short term or emergency accommodation;
  - 20.3 are requesting ‘other’ housing/accommodation.
- The number of women presenting to homelessness services because of family violence has risen by 64% between 2011-2012 and 2019-2020 with an average increase of six per cent per year.<sup>1</sup>
- More than half of single women in Australia over 50, earn the minimum wage or less, which does not cover the costs of even the most basic housing.

<sup>1</sup> AIHW Specialist Homelessness Services Fact Sheet Victoria 2019-20

## OUR VISION

Adequate safe and secure housing solutions which provide timely, accessible, and affordable homes for women, children, and young people in vulnerable circumstances.

## OUR OBJECTIVES

- To contribute to the Victorian Government’s **establishment of baseline data** on available housing options for women across Victoria, through the linked data project, to better inform planning and future supply of affordable housing and emergency accommodation.
- To ensure by 2025 there is **adequate supply of transitional and long-term housing** for women and children to meet demand.
- To work with the Victorian government to develop a stream of **safe and secure emergency accommodation options** for women and children escaping family violence and homelessness to prevent their re-traumatisation in unsafe and insecure private motels.
- To continue to **promote the ‘Homes for 100 Women’ Demonstration Project** as a viable alternative women-centred housing model as a workable solution with capacity for scaling up, with a focus on gaining a funding commitment in the 2022 State Budget.
- To build on the established relationships **with decision-makers and continue to influence funding and policy decisions** about the housing needs of women and children and the importance of cross-government responses to deliver joined up solutions.

## 2. ABOUT THIS SUBMISSION

The ‘Social Housing Regulation Review - Consultation Paper 1’ poses broad questions for consideration. This submission by the WHA focuses on two key aspects that underpin the opening statement of the Consultation Paper:

*“Safe and suitable housing is a basic human need without which Victorians cannot aspire to live stable productive lives, maintain or recover their physical and mental health, provide for themselves and their families and participate in their community.”*

## A GENDER LENS

More women live in poverty than men and this gendered poverty is closely linked to housing crisis and homelessness. For vulnerable women, the tipping point into homelessness can be losing a job, the break-up of a relationship, escaping family violence or the death of a partner.

The WHA represents this vulnerable cohort and welcomes the opportunity to contribute to the Victorian Government’s Social Housing Review. The factors that lead to homelessness represent a complex set of social conditions that are generally different for women than for men. The intersectionality of these social conditions need to be understood to match housing to need.

The WHA represents Victoria’s key providers of housing and support for vulnerable women and their dependent children and is best placed to advocate for the inclusion of a gender lens across all legislation and policy relating to social housing in Victoria.

We believe that the two recommendations put forward in this submission underpin the considerations by the Review Panel.

**Recommendation 1:** That the Review Panel ensures that a gender lens is embedded across all of its considerations in alignment with the Victorian Government’s ‘Safe and Strong: Gender Equality Strategy’.

## STANDARDISED REPORTING FRAMEWORK

The Victorian Government’s Gender Equality Baseline Report 2019<sup>2</sup> provides a set of measures against which progress towards gender equality outcomes in Victoria will be monitored over time. The development of the Baseline Report was a founding reform of Victoria’s gender equality strategy, Safe and Strong and outlines priority focus areas for future data collection. The Report recognises the significance of intersectionality and the value of reliable disaggregated data. However, the disparity in data capture and reporting methodology across the social housing sector hinders the sector’s ability to design fit-for-purpose social housing policies, funding allocations, and interventions.

**Recommendation 2:** That the Review Panel commits to the establishment of a standardised reporting framework across the social housing sector to establish accurate disaggregated data to inform regulation, policy, strategy, funding, and service delivery that is fit for purpose and responsive to changing needs.

## 3. ALIGNMENT TO THE VICTORIAN GOVERNMENT ‘GENDER EQUALITY ACT 2020’ AND ‘SAFE & STRONG: A VICTORIAN GENDER EQUALITY STRATEGY’

### GENDER EQUALITY ACT 2020

Embedding a gender lens throughout the Social Housing Regulation aligns with the objects of the Gender Equality Act 2020<sup>2</sup> to:

- promote, encourage and facilitate the achievement of gender equality and improvement in the status of women;
- support the identification and elimination of systemic causes of gender inequality in policy, programs and delivery of services in workplaces and communities;
- recognise that gender inequality may be compounded by other forms of disadvantage or discrimination that a person may experience on the basis of Aboriginality, age, disability, ethnicity, gender identity, race, religion, sexual orientation and other attributes;
- redress disadvantage, address stigma, stereotyping, prejudice and violence, and accommodate persons of different genders by way of structural change;
- enhance economic and social participation by persons of different genders;
- further promote the right to equality set out in the Charter of Human Rights and Responsibilities and the Convention on the Elimination of All Forms of Discrimination against Women.

### SAFE AND STRONG: GENDER EQUALITY STRATEGY

The Alliance commends the Victorian Government’s response to the Royal Commission into Family Violence through its Safe and Strong: Gender Equality Strategy, which sets out a framework for enduring and sustained

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<sup>2</sup> Victorian Government: Gender Equality Baseline Report 2019

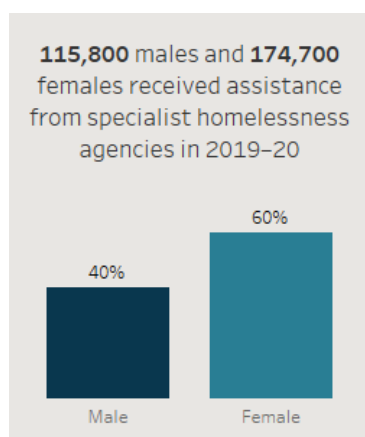
action over time. In particular, the commitment by the Victorian Government to **apply a gender lens across all of its levers**.

*“The Victorian Government has an important role in setting standards for acceptable behaviour and modelling good practice. The Victorian Government has an important role in setting standards for acceptable behaviour and modelling good practice. That’s why in this Strategy the Victorian Government applies all its levers - legislation, policy development and budgeting as well as public sector employment and more - to achieve gender equality and prevent violence against women and girls.”<sup>3</sup>*

Given the above commitment, it is surprising to note that the 26-page ‘Social Housing Regulation Review - Consultation Paper 1’ includes only one reference to ‘women’ (p19) and an inference to women in the only reference to ‘domestic violence’ (p12).

National statistics on Specialists Homelessness Services Annual Report <sup>4</sup> by the Australian Institute of Health and Welfare (AIHW) provide baseline data that supports the critical need to embed a gender lens across the Social Housing Regulation and on housing and social services.

*Figure 1:* shows that of the 290,500 clients who received assistance from specialist homelessness agencies in 2019-20, 174,700 (60%) were female.



*Figure 1: Summary findings from the 2019-20 Specialist Homelessness Services Annual Report*

*Figure 2:* shows that family and domestic violence was the most common main reason identified for seeking assistance for almost 1 in 3 clients, 29% or about 82,300 clients, and that 18% or around 50,700, identified housing crisis as the main reason for seeking assistance. In 2019-20, of the adults who experienced family and domestic violence, most were female (9 in 10 or 90%)

<sup>3</sup> Victorian Government: Safe and Strong: Gender Equality Strategy

<sup>4</sup> AIHW Specialists Homelessness Services Annual Report

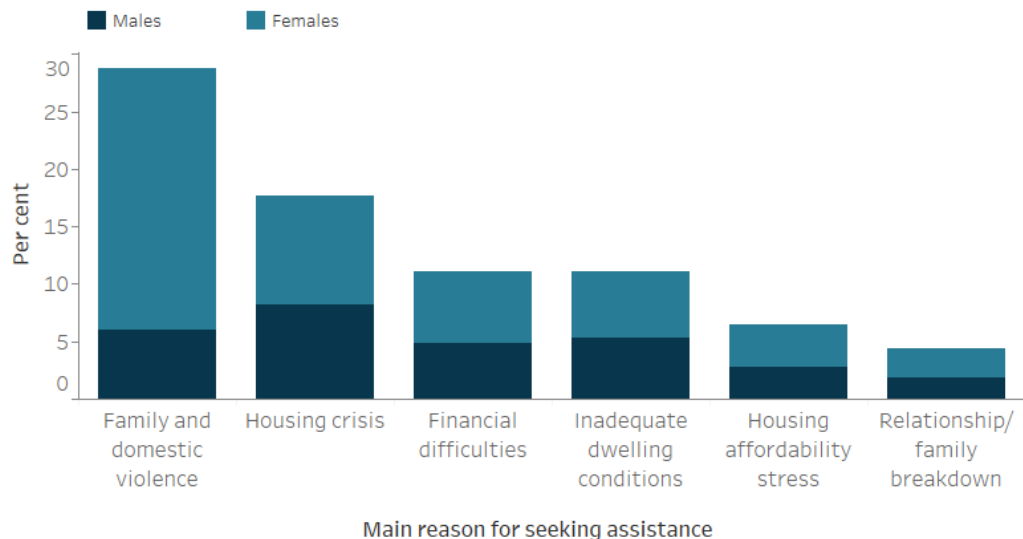


Figure 2: Clients by main reason for seeking assistance (top 6), 2019–20

The AIHW <sup>5</sup> breakdown for Victoria shows that 108 requests for homelessness assistance went unmet each day. In August 2019, crisis homelessness services in Melbourne’s west reported that of the 13,546 presenting to homelessness, 4000 (30%) were turned away without appointments.

**Recommendation 3:** That the Review Panel ensures that a gender lens is embedded across all of its considerations in alignment with the Victorian Government’s ‘Gender Equality Act 2020’ and its ‘Safe and Strong: Gender Equality Strategy’.

#### 4. STANDARDISED REPORTING FRAMEWORK

Identifying common metrics for tracking progress toward a common agenda across the system and providing scalable platforms to share data, discuss learnings, and improve strategy and action is key to informing regulation and policy.

Shared measurement delivers:

- Improved data quality
- Tracking progress toward a shared goal
- Enabling strategic coordination and collaboration
- Learning and course correction
- Catalysing action

Standardised definitions and consistent methodologies underpin quality data which in turn enables policy makers and service providers to make informed decisions regarding how to identify trends, measure the success of interventions, and secure funding.

A simple unique client count for women seeking refuge and social housing in Victoria is challenging as there are different client counts from different sources.

- AIHW has a unique client count of 53,202;
- Crime Statistics Victoria counts 56,600, but in its data visualizations the unique client number is 51,164. Even though their data is derived from AIHW, Crime Statistics Victoria advise: “during our

<sup>5</sup> AIHW Specialists Homelessness Services Annual Report

*processing of figures we remove clients that were believed to be referrals to an agency who were not able to be contacted or never received a service.”*

AIHW 19-20	Australian Institute of Health and Welfare, Specialist Homelessness Services Annual Report 2019-2020 Available: <a href="https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-annual-report/contents/summary">https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-annual-report/contents/summary</a> Unique client no = 53202
CSV 19-20 (data table)	Crime Statistics Victoria, Specialist Homelessness Services <a href="https://www.crimestatistics.vic.gov.au/family-violence-data-portal/download-data-tables">https://www.crimestatistics.vic.gov.au/family-violence-data-portal/download-data-tables</a> Unique client no = 56600
CSV 19-20 (homelessness data visualization)	Crime Statistics Victoria Family Violence Data portal <a href="https://www.crimestatistics.vic.gov.au/family-violence-data-portal/specialist-homelessness-services-in-victoria">https://www.crimestatistics.vic.gov.au/family-violence-data-portal/specialist-homelessness-services-in-victoria</a> Unique client number = 51164

## INTERSECTIONALITY

Intersectionality recognises that people’s identities and social positions are shaped by multiple factors. Among others, a person’s age, disability, ethnicity, gender, gender identity, religion and belief, sexual orientation and socioeconomic background contribute towards their unique experiences and perspectives. This briefing provides guidance and examples of intersectional approaches to research design, and quantitative and qualitative equality research and data analysis.

Data disaggregation must be prioritised. Disaggregated data enables those working in the field to have more precise information about the subgroups within the population of people experiencing homelessness, in turn enabling policymakers, service providers, and advocates to have accurate information by which to guide their activities.

Current data is inconsistent across the breadth of demographic diversity across disadvantaged Victorians experiencing homelessness.

The Gender Equality Act 2020 <sup>6</sup> highlights the significance of intersectionality:

*“For many Victorians, gender inequality may be compounded by other forms of disadvantage or discrimination that a person may experience due to other characteristics, such as:*

- *race*
- *Aboriginality*
- *religion*
- *ethnicity*
- *disability*
- *age*
- *sexual orientation*
- *gender identity”*

Current data is both inconsistent in methodology and is not sufficiently disaggregated, failing to reflect the specific needs that certain subgroups have within a cohort. Ideally, Australia needs a common national metrics, however, Victoria has the opportunity to lead the way in developing a common metrics that maps to key national metrics.

<sup>6</sup> Victorian Government: Gender Equality Act 2020

**Recommendation 4:** That the Review Panel commits to the establishment of a common metrics across the social housing sector to establish accurate disaggregated data to inform regulation, policy, strategy, funding, and service delivery that is fit for purpose and responsive to changing needs.



## REFERENCES

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<sup>1</sup><https://www.aihw.gov.au/getmedia/71ecc667-ab01-4ab4-9d5f-1ed4839ff2b5/aihw-hou-322-vic-factsheet.pdf.aspx>

<sup>2</sup><https://content.vic.gov.au/sites/default/files/2019-12/319%20DPC%20Gender%20Equality%20Baseline%20Report%202019%20web%207.pdf>

<sup>3</sup><https://www.vic.gov.au/safe-and-strong-victorian-gender-equality>

<sup>4,5</sup><https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-annual-report/contents/summary>

<sup>6</sup><https://www.legislation.vic.gov.au/as-made/acts/gender-equality-act-2020>