



Women's Electoral Lobby and Older Women's Network NSW

**Response to
Foundations for change-Homelessness in NSW
Discussion Paper**

October 25th 2016

THE WOMEN'S ELECTORAL LOBBY NSW

The Women's Electoral Lobby NSW (**WEL**) is an independent, feminist lobby group dedicated to creating a society where women's participation and their ability to fulfil their potential are supported and respected. Founded in 1972, WEL advocates policy solutions to issues that continue to disadvantage women. WEL members and leadership are committed volunteers.

WEL promotes equality between men and women and seeks to change attitudes and practices that discriminate against women, particularly those relating to women's health, safety, economic security, and participation in public life.

THE OLDER WOMEN'S NETWORK NSW

Established in 1985, the Older Women's Network of NSW (**OWN**) is an active network of older women in NSW who seek to uphold the dignity, respect and rights of older women. Operated almost entirely as a volunteer organisation, OWN has its roots in advocating for social justice, and providing meaningful and engaging activities to enhance social connectedness and wellbeing.

INTRODUCTION

WEL and OWN recognise that combating homelessness is a complex challenge which requires government, the not-for profit sector, the community, the housing industry and potential financiers in the private sector to act and respond at many different levels. We accept the analyses from most economists that, left to itself, the market – especially the Sydney metropolitan market - will not in the short or long term produce an adequate supply of rental housing or housing for purchase which could be affordable for a significant proportion of the NSW metropolitan population: people with little or no wealth, in insecure or intermittent work, in receipt of **average** incomes or dependent on government benefits and pensions.

We are very concerned that women, particularly older, single women, already make up a significant proportion of the homeless population and are at dire risk of becoming homeless in the future. Market driven approaches to increase supply – which have long been the default affordable housing policy in NSW - have especially negative impacts on women at all life stages. Currently a single woman earning \$973, the average wage for women in New South Wales, could not afford the average rent on a one bedroom property in an outer area like the Blue Mountains, Penrith, Campbelltown or Gosford, according to Housing NSW figures. They would however be able to afford the average rent of the greater metropolitan area, which extends from Cessnock to Wollongong. In contrast single men, on an average weekly wage in NSW of \$1,420, would be able to afford middle-ring suburbs like Bankstown, Parramatta, and Manly.

As a starting point, WEL and OWN therefore strongly recommend to the NSW Government that any homelessness strategy arising from this consultation take the needs of older single women into account and adopt as its overarching framework

the ten proposals recommended by the NSW peak advocacy body, Shelter in *'Housing Everyone: 10 proposals for the 2016 state budget and beyond'*. Of these ten proposals, in particular the first 'Increase the supply of social housing'; the seventh 'Increase the capacity in specialist homelessness services to respond to homelessness'; the eighth which recommends 15% inclusionary zoning for affordable housing in areas earmarked for higher density development, the ninth which calls for protections for existing public housing and the tenth which calls for amendments to residential tenancies legislation to prohibit 'no cause' evictions, would if implemented, begin to make tangible improvements to older women's access to secure housing over the next few years.

In addition, we recommend that a NSW Homelessness Strategy incorporate Shelter's other six proposals: establish new ways to finance affordable rental housing; expand the range of suitable dwellings available to people with a disability, move to tenure neutrality in tax policy, and use value sharing to allow developer contributions to affordable housing.

Ultimately the greatest impact on older women's homelessness (and homelessness in general) would come from the NSW Government **reforming and regulating the rental market to enable secure long term tenures, more affordable private and community housing rentals and the practical possibility of alterations to dwellings that would enable older renters to age in place.**

Older Women and Homelessness

WEL and OWN note specific economic and social factors lead to women's disadvantage in multiple life areas, and impact on women's access to safe and secure housing. They underpin many older women's experiences of homelessness, housing instability and dislocation. These factors include:

- Women's comparative poverty, marked by a persistent gender gap in women's lifetime and retirement incomes and assets; this results from factors including pay inequality, discrimination, gendered career differences, women's caring responsibilities and outcomes of separation and property settlements
- The effects of domestic and other gendered violence against women, including financial abuse which often diminishes or destroys women's housing security.

Such factors exacerbate the effect on women of the crisis in affordable housing that affects Australia and the Sydney area in particular, with an increasingly unaffordable private rental market and reduced number of social housing vacancies. In addition, while we note the steps that the NSW government has taken to increase availability of affordable social and semi-private 'community' rental housing, the shortage in this area is continuing. There is a need for greatly increased supply if homelessness is to be addressed both in general and for women specifically. We emphasise that this needs to be the core strategy for increasing access to housing.

In addition, while some common factors disadvantage women as a cohort, the situations and needs of women who need assistance related to accommodation are very diverse, and require different, flexible and expertly planned and managed responses from specialised services.

Women who are homeless primarily due to poverty, such as older women who cannot afford private rental and are first time homeless, may require only affordable secure housing and limited support, but nevertheless still desperately need targeted services together with the first stepping stone of suitable interim accommodation.

All women who have fled the home as a result of domestic and family violence require specialist and integrated responses not just to their need for accommodation and long-term housing. This group requires a coordinated response to domestic violence and its impacts, and the response to their accommodation needs should be seamlessly integrated with domestic violence responses rather than being dealt with solely by generalist homelessness services.

Women who have experienced other trauma or mental health problems, and women with drug and alcohol problems also require specialist assistance and support.

Service responses need to be specific to the needs of women, with practices and accommodation arrangements that recognise the impact on women of past and recent violence and trauma, and with women assisted by staff with specialist skills appropriate to their situation.

We are of the view that local, specialist community based services are very well placed to provide these services. Large, generalist agencies rarely have the specialist expertise and experience to provide the most responsive services to vulnerable women.

There are two specific components to our response to the Discussion Paper.

The first section relates especially to Women's Electoral Lobby's concerns (signalled in our introduction) regarding underlying assumptions of the Discussion Paper's analyses and the questions arising.

In our response to the Discussion Paper's treatment of family violence and homelessness and the related questions posed, we call for a tailored and expert response to the needs of women and their children, and older women, forced to leave violent partners and families. We make a number of recommendations which specify how these should be shaped as seamless 'wrap around' support and services.

The second section of this OWN/WEL response to the Discussion Paper addresses the challenges raised by the increasing vulnerability of older and primarily single women to homelessness. It is now well established that older women living alone in

private rental endure the highest level of rental stress of any population group and we are pleased that the Discussion Paper acknowledges this. We know that older women are one of the fastest growing cohorts of women living in poverty, with almost 39% already poor. Alarming of the 61% of women aged pensioners receiving the maximum rate, over 27% are not home owners.¹ The 2014 NSW Government's Annual Women in NSW Report states that 'Out of the total over 45 population paying rents and mortgages, single women made up 60 % of people experiencing rental stress and 56% of those experiencing mortgage stress'.

The Discussion Paper canvasses a wide range of issues connected with homelessness. Overall it posits more than 30 discussion questions and sub-questions of varying degrees of conceptual generality and scope. Rather than addressing all of these in sequence, we have commented on those that are relevant to our focus on single older women and women leaving domestic and family violence.

Thus, under the Discussion Paper heading 'Housing Pathways,' there are questions about barriers to linking people to suitable housing options, ways of making access to social housing more responsive and the supports and tenancy management approaches that can help keep people at risk of homelessness in their homes. Most of these are answered either explicitly or implicitly in our responses to the Paper's questions on Family Violence and on Older Women.

There are also flawed assumptions underlying some questions. For example those on 'using data to improve services' overlook the inadequacy of much current data and the underpinning definitions. This is illustrated by the Discussion Paper's own admission in the series of questions under the heading 'Strengthening Collaboration,' that there is no agreed 'system wide' definition of key terms such as 'homelessness, prevention, early intervention, and crisis responses' across the NSW housing sector.

Our response also draws attention to the varying definitions of 'older women' and the implications for identifying and preventing homelessness. As well we draw attention to the vast spectrum of women's experience of 'domestic and family violence' which can extend to family or carer perpetrated 'elder abuse', in particular financial abuse, with devastating consequences for housing across the age range.

This joint response from WEL and OWN to the 'Discussion Paper, Foundations for Change: Homelessness in NSW' incorporates and builds on our research, activism and advocacy work over the past four decades. This includes submissions to parliamentary inquiries on women and housing and elder abuse and pioneering work supported by OWN on violence against older women and older women's homelessness.

Section 1 FAMILY VIOLENCE AND HOMELESSNESS

¹ Australian Senate Economic References Committee 'A husband is not a retirement plan': *Achieving economic security for women in retirement* June 2016:13-14

How can we build on Staying Home Leaving Violence and Start Safely, to address the risk of homelessness for people experiencing domestic and family violence?

Start Safely

A significant proportion of women who choose to stay in their home and have the perpetrator removed are in private rental properties and generally lose income to assist with the rent when the perpetrator is removed. Evidence also shows that in the long term few women can manage a mortgage financially without the additional income that the perpetrator provided. However eligibility to receive Start Safely for the 2-year period would enable women to remain in the property and progress family law matters including a property settlement. This would allow women to plan to obtain future housing and prevent homelessness.

Recommendation

- That government adopt policies to ensure that women who remain in their home under a private lease or with a mortgage are eligible to remain in the property and receive the Start Safely subsidy.

Recommendation

- That Start Safely be extended to 2 years to assist women with or without children who are paying a mortgage to remain in their home.

Police protection

A majority of women who leave a violent relationship experience post-separation violence whether they remain in their home or leave. The perpetrator usually knows where the woman and children live and will be familiar with any security weaknesses that may not be resolvable through a general security up-grade. Effective police responses during this period are critical in relation to AVOs and the granting of exclusion orders and timely responses to breaches.

Recommendation

That Police prioritise protection for women with or without children during post separation period.

Increase funding for Staying Home Leaving Violence (SHLV) program

Each Staying Home Leaving Violence (SHLV) program receives annual funding of approximately \$200k. Typically this provides for 2 FTE. In practice this means that SHLV programs are often turning away women and children due to limited staffing capacity.

Recommendation

Provide funding for at least one additional caseworker position at each SHLV location to ensure that women who want to remain in their home are not turned away from the SHLV program.

Link SHLV workers with Women's Health Centres

The women's health centres in NSW have forty years experience of providing counselling, medical services, referrals and practical support to women undergoing and at risk of, domestic violence. Placing SHLV workers in the 16 women's health centres which don't currently have them would significantly increase NSW's capacity to support women and children and reduce the harmful effects of domestic violence in their communities.

Recommendation

Place SHLV workers in every multidisciplinary women's health centre in NSW.

Convert Communal Refuge Accommodation to unit styles

Self-contained units, where possible, in women's refuges would improve privacy, the environment for recovery and access to women with teenage male sons, families with disabilities, older women and women from CALD backgrounds.

Recommendation

That Government fund a conversion program so that woman with children and older women have self-contained unit accommodation in women's refuges.

Children's workers

Up until recent reforms all women's refuges had specialised child-focussed staff and children were treated as clients in their own right – not simply accompaniments to their mothers. As a result of the Government's Going Home Staying Home reforms and competitive tendering most services only 14 of 63 women's services now employ child-focussed workers and children are identified on intake and assessment forms as 'Accompanying Person Attachments'

Recommendation

That Government fund children's workers in all emergency accommodation housing women and their children

Sensitise Intake Procedures for women fleeing domestic violence

Women fleeing violence are shunted through call-centres then subjected to an hour long intake interview... and still not guaranteed of a bed in a refuge. Of the 76 interview questions only 3 relate to domestic violence and a woman's safety. The remaining 73 questions are designed to establish the woman's financial and rental history, including how much her debt repayments are per fortnight, when her next pay is due, how much her car repayments are, and how much she owes on her credit card.

Recommendation

That intake interviews be shortened and focus on issues relevant to safety of women, their children and older women.

Domestic Violence Prevention Clinics in NSW Women's Health Centres

While advice is provided from crisis services and various phone lines, it is estimated that around **50 to 60 percent** of women experiencing domestic violence do not contact the police and many do not access crisis services or the police. There is scope for the government to improve the state's prevention and early intervention

strategies by expanding them to face to face non-crisis services, including the established network of women's health centres in NSW. NSW women's health centres provide medical and allied health services, counselling, health education and support to women experiencing financial and social disadvantage, domestic and family violence and recovering from childhood abuse.

SOS Women's Services has submitted a proposal to the NSW Government to establish Domestic Violence Prevention Clinics in all 17 multidisciplinary women's health centres. Under this model, women who attend the clinics will receive appointments with a Staying Home Leaving Violence caseworker, a financial counsellor and have a health check up with a GP or nurse all on the same day, across the state.

These Clinics would draw on four decades of expertise accumulated through women's health centres to support women and children at risk of and experiencing violence. Adoption of the proposal would lift some of the current pressure from crisis services (including refuges) to be the main source of support. Such specialist clinics could assist women and children to remain in their own homes (where possible) and provide immediate and practical wrap around services to women (including older women) who don't want to access, or don't require, crisis services.

Recommendation

That Domestic Violence Prevention Clinics with a full time Staying Home Leaving Violence Caseworker be funded in all Women's Health Centres throughout NSW as fast as possible.

Safer Pathways rollout ensuring early intervention

Recommendation

That homelessness services liaise regularly with Corrective Services Commission and support groups to assist people when they come out of gaol.

Recommendation

That the NSW Government study models which are working well elsewhere and adapt to NSW needs ; e.g. Victoria Homeground

<http://www.homeground.org.au/what-we-do/individual-services/tenancy-and-property/>

USA Housing First

https://en.wikipedia.org/wiki/Housing_First

Housing Stock location

Recommendation

That Government ensure that affordable and social housing stock is increased in inner city eastern and northern suburbs of Sydney.

Section 2 OLDER WOMEN AND HOMELESSNESS

A 2015 review of the NSW Ageing Strategy identified housing as the *least advanced component of the strategy*. (Better Outcomes Better Lives Evaluation of the NSW Ageing Strategy, NSW FACS 2015:115-17).

We agree with the diagnosis provided under 'housing' in the updated and recently released NSW Ageing Strategy 2016-2020:

*Current circumstances are not supporting some groups of older people to maintain stable housing. This includes those retiring with housing debt, the growing number of people in low-income rental households who may also have insecure employment, **single women** and those who are homeless. Renting in older age has several negative impacts on health and quality of life, especially for those with dementia, disability or other health and mobility issues. The often precarious nature of private rental, restrictions on adaptation and costs can have negative impacts. Laws protecting people who rent do not specifically consider older renters or issues of age discrimination against older tenants. Older people in private rental can be at higher risk of homelessness. While most people over 60 we spoke with believe their tenancy is stable, a small but substantial number of renters believe it is not (NSW FACS 2016:27).*

We note that the Strategy proposes a number of very general actions in response. These focus on widening options for affordable, stable and accessible housing within the private rental market, changes to NSW Government planning and regulatory responses and working with the private sector on housing supply, design and tenant support, including support for people on low incomes (NSW FACS 2016:28).

OWN recommends that implementation of the NSW Ageing Strategy should specifically seek to more closely integrate housing for older women under threat of homelessness with the provision of essential community services, along the lines we have already discussed in our first section on women escaping violence. Such integration is essential to prevent homelessness. Later in this response we suggest that the Commonwealth Government's Assistance with Care and Housing for the Aged (ACAHA) program serves as an effective and long established model and has potential for expansion under a joint NSW Commonwealth partnership.

Opportunities to identify and support older women who may be vulnerable and at risk of homelessness

Older Women are particularly vulnerable to homelessness due to life events such as leaving violent relationships, job loss and the onset of chronic disabling illnesses

Older women are especially vulnerable to financial abuse from children and family taking savings and the family home.

Both Older Women's Network and Women's Electoral Lobby strongly endorse the analysis and recommendations of Homelessness NSW's '*Plan for Change: Homes for Older Women*' (February 2016). We agree that:

'Older women should not be homeless in Australia in 2016. They deserve a better deal - one that recognises their contribution and respects their dignity. It is not acceptable that there is currently no NSW Government priority for addressing the housing needs of older women, despite increasing evidence that the numbers who are homeless, or living in housing stress, is growing.

There is no Australian or NSW Government strategy for responding to this issue, no targets have been set, evidence is not being systematically gathered

to understand the scale and nature of the problem, and no funds have been allocated to respond.

Single older women are amongst the most marginalised groups in terms of their access to safe, affordable housing that is well located and suitable for their needs.’ (Plan for Change:2)

Plan for Change makes six recommendations to the NSW Government:

1. develop a strategy to address homelessness of older women;
2. fund development of trial affordable housing projects for older women;
3. increase security and the option for long term tenure in private renting;
4. improve the responsiveness of the housing and homelessness service system to older women,
5. develop a targeted mixed equity model for older women, and;
6. secure the financial independence of older women.

We support these recommendations. In addition we endorse and recommend:

- collection and analysis of data disaggregated for gender and age;
- setting clear targets for tackling older women’s homelessness with initiatives to deliver these targets which include access to social and affordable housing and rent subsidies (such as a private rental subsidy that every homeless older woman is entitled to – similar to the subsidy available to people with disability or health problems waiting for social housing); and
- review of the prioritisation process used by housing providers to allocate social housing under the Housing Pathways system-which currently prioritises complex needs above poverty and means low income, older, homeless women often lose out.

Interagency collaboration

In working with the private sector on housing supply, design and tenant support for older people, the NSW Government needs to take account of evidence showing the critical role played by broader community and environmental contexts in sustaining the health and well-being of older people (and the negative impacts of loneliness). The NSW Ageing Strategy acknowledges this research. We recommend that government encourage the private sector and community housing providers to draw on experiences in the UK, US and Europe of innovative, community based approaches such as high quality, cooperatively managed boarding houses and congregate housing, as well as seniors and intergenerational co-housing.

As envisaged by the NSW Ageing Strategy, we urge the NSW Government to foster genuinely alternative accommodation models for older women funded through public/ private sector financing. This would help fill the gap created through the decline of hostel accommodation for low income, independent older people at moderate rents in community settings.

Such accommodation should be planned as adaptable housing for older people and also provide interim housing for older women forced from their homes by violence, abuse, illness or a domestic or financial crisis and who currently have no alternatives other than nursing homes.

Another opportunity to support older women vulnerable to or at risk of homelessness lies in better collaboration across government agencies on specifically targeted projects for older women. This is consistent with a strategy mentioned in the NSW Government's Future Directions for Social Housing in NSW for 'wrap around services', as well with the principles and practices underlying the Commonwealth's Care and Housing for the Aged program.

However it must be emphasised that the very poor employment and financial prospects faced by many older people and single women over 55 who lose their jobs, especially those with health issues, means that their tenure in such housing will need to be permanent and secure². This is at variance with at least some of the Government's messages that social housing be seen as a temporary option prior to the resumption of employment.

Older Women in NSW and Hidden Homelessness

The ABS considers that 'when a person does not have suitable accommodation alternatives they are considered homeless if their current living arrangement:

- is in a dwelling that is inadequate; or
- has no tenure, or if their initial tenure is short and not extendable; or
- does not allow them to have control of, and access to space for social relations'.

The ABS definition of homelessness is informed by an understanding of homelessness as **home**-lessness, not **roof**-lessness. It emphasises the core elements of 'home' in Anglo American and European interpretations of the meaning of home as identified in research evidence. These elements may include: a sense of security, stability, privacy, safety, and the ability to control living space. Homelessness is therefore a lack of one or more of the elements that represent 'home'.

The ABS identifies the core elements of homelessness as involving:

- Adequacy of the dwelling;
- Security of tenure in the dwelling; and
- Control of, and access to space for social relations'.

² See the sections on demographics and labour market trends and health in *Willing to Work: Report of the National Inquiry into Employment Discrimination against older Australians with a Disability* AHRC,2016:37-39

That this broad definition of homelessness is still neither widely shared nor well understood, contributes to the *invisibility* of much of the homelessness of older people and older women in particular. Homelessness amongst older women in NSW is dramatically underestimated.

As with younger women, 'homelessness' understood as having no housing choice, can play a critical role in older women's vulnerability to violence and abuse. Women with no housing alternatives will often endure repeated violence and abuse from intimate partners, or in the case of older women, from family members.

The fear and shame of becoming homeless prevents older women from leaving violent relationships. Further, homeless older women cite shame and fear as the reason that they don't talk about being homeless.³

Similarly older people living in 'under one roof' in intergenerational domestic situations can be said to be 'homeless' where relationships with the older person and their family carers are strained by the stress of care and responsibility of looking after a vulnerable person, or where limitations of space mean that the older person cannot have privacy or independent social interactions.

Older women who are frail or in crisis may feel forced to stay with family and /or an informal carer, because transition to residential care is expensive and may entail selling their home, with all the attendant anxieties and pressures which can easily shade into forms of financial abuse. In this sense they are homeless under the ABS definition, because they have no suitable accommodation alternatives.

In testimony given to the 2014 Legislative Council Inquiry into Registered Nurses in NSW Nursing Homes (report tabled October 29 2015) witnesses drew attention to the gap in appropriate housing options for older people. Older people overwhelmingly prefer to stay in a community setting with home care but may have no option following a crisis (such as abuse or violence) than extended stays in hospitals, respite care and nursing homes.

The AHURI sponsored research, *Preventing First Time Homelessness Amongst Older Australians* also found that housing crisis for older people was often:

... linked to the breakdown in intergenerational housing arrangements or being unable to continue living with family. Older people faced a housing crisis when they were unable to continue living with family due to carer stress, overcrowding, tension, family relationship breakdown and, in a small number of cases, elder abuse. A majority of older people who were unable to continue living with family (74%) came from Cultural and Linguistically Diverse (CALD)

³ McFerron, L (2010) *It Could be You: Female, Single, Older and Homeless*, Homelessness NSW and OWN NSW; Pederson, M and Parsell, C 'Older Women's Pathways Out of Homelessness', Report for the Mercy Foundation 2014

backgrounds and this seems to be linked to intergenerational family housing arrangements⁴.

Participants in WEL and OWN's joint forum on violence against older women observed that even community housing could be too expensive for older women – proportionally linked as it is to market rents - and that there was very limited stock for women living alone in social housing. Experience of domestic violence, including violence and abuse suffered by older women, should be a criterion for social housing eligibility.

WEL and OWN are also very disappointed that the *Going Home Staying Home* reforms do not specifically include in their accommodation options housing pathways appropriate for older women escaping abuse and violence from family members including carers.

More recently the NSW Elder Abuse Help Line reported in its submission to the 2015/16 NSW legislative Council Inquiry into Elder Abuse that:

*'Older women constitute a significant proportion of elder abuse calls made to the Help Line. Violence against women does not stop as women age. In fact, older women are at risk of abuse by a broad range of family members and carers. The violence may become more complex, compounded by issues such as poor housing options outside of the abusive environment, financial insecurity, and dependence on the alleged abuser(s). **Accordingly, older women may need different responses to younger women***

*In situations where an older person wants to and is willing to leave a situation of abuse, **accommodation often presents as a barrier**. The Helpline often seeks social admissions to hospitals to 'rescue' the older person from abuse only for the older person to be discharged and return to an abusive environment due to lack of appropriate short- or long-term housing options.*

*One of the few options available is nursing homes which are **often not appropriate or desirable for the older person who often chooses abuse over residential aged care**.(WEL/OWN emphasis)*

The Helpline submission recommended that the NSW Government plan for provision of housing, similar to that proposed by WEL's Women and Children Safety Program and modelled on the integrated and expert approaches taken in Assistance with Care and Housing for the Aged.

Specifically the Helpline's proposals are for:

- *Short-term emergency accommodation that is appropriate for the needs of older persons, with access to assistance to acquire future long- term housing.*

⁴ AHURI Research and Policy Bulletin 191 2015 *Preventing first time homelessness amongst older Australians*

- *Prioritised assessment and establishment of community services to enable independent living; and that*
- *Older persons fleeing abuse, who have limited finances, to be prioritised by the Department of Housing and placed in appropriate long-term dwellings.⁵*

WEL and OWN strongly support these recommendations.

The aged care system and the prevention of homelessness

One barrier to identifying older women at risk of homelessness is the lack of a shared understanding around the meaning of ‘older’ which in turn has an impact on people’s sense of connection with ‘aged’ care. There are varying definitions of ‘older.’ For instance, the age of access to Commonwealth aged care programs is 65 years - although officially there is no minimum age specified under the legislation supporting ‘My Aged Care’ - and the pension age is 67. On the other hand, in family and domestic violence research ‘older’ women are defined as being 45 years and over.

Furthermore in many jobs there is a perceived disadvantage to being ‘old.’ There is now extensive evidence of age discrimination beginning against older workers in their forties – most recently in research completed by the Human Rights and Equal Opportunities Commission.

Older women reported as having led conventional lives but facing homelessness in their fifties, due to poverty linked with reliance on the rental market and early or forced ‘retirement’, are not connected (and tend not to connect themselves) with the aged care system. If they think about the system it is likely to be in connection with anticipated eligibility for the aged pension in their late sixties. In their fifties and sixties they may well be struggling on much lower incomes through accessing Centrelink benefits such as New Start, Disability Support Pension and possibly Commonwealth Rental Assistance.

In WEL and OWN’s submission to the 2015 NSW Legislative Council Inquiry into Elder Abuse we recommended that responses to violence and abuse against older women need to be designed in the context of crisis responses to domestic violence, with appropriate housing options at whatever life stage they are at.⁶ The aged care system – even as a respite option – is not an appropriate recourse for economically vulnerable older women in their late forties, fifties and early sixties suffering potential homelessness due to violence or abuse.

Research undertaken for the Australian Housing and Urban Research Institute *Preventing First Time Homelessness Amongst Older Australians* warns against

⁵ NSW Legislative Council Inquiry into Elder Abuse: Elder Abuse Hotline and Resources Unit Submission No 33: <https://www.parliament.nsw.gov.au/committees>

⁶ NSW Legislative Council Inquiry into Elder Abuse: Older Womens Network and Women’s Electoral Lobby Submission No 55

seeing the aged care system as a panacea for older people's homelessness, without regard to the shifting and variable definitions and circumstances of 'older' people impacted by age discrimination or simply by accumulated poverty or a life event such as job loss or relationship breakdown:

Adopting a lower age of 45 or 50 years as 'old' runs the risk that aged care accommodation is seen to be the appropriate housing response. The aged care system may not be appropriate for the larger population of older people who are homeless for the first time or at risk of homelessness in their later years. Further, older people, along with other groups who have experienced homelessness, overwhelmingly prefer to live in non-institutionalised housing.) Social class, occupation, education and health are all determinants. Income maintenance policy reflects this with the change to 67 years for eligibility for the Age Pension. Income maintenance entitlements for people aged less than 67 years are likely to be the Disability Support Pension or New Start Allowance. However, the reduced income attached to the New start Allowance will affect people's capacity to pay market rates of rent.(p9)⁷

Another issue identified in the AHURI research on *Preventing Homelessness* was the reluctance of first time homeless, older people to engage with the welfare and homelessness sectors, due to lack of familiarity or identification of themselves as either homeless or welfare recipients.

Most older people (70%) over 65 did not in fact use an aged care service in 2011-12 (Australian Institute of Health and Welfare 2015:36) Little is known about this group. It is conveniently assumed that those not accessing the system do not need assistance. Negative views of dependency, especially when dependency entails use of Government services are a powerful component of ageism and indeed gerontophobia.

We need to know more about those who are *outside* the aged care service system, particularly those unable to access support due to marginalisation and isolation arising from poverty, language and cultural barriers.

Difficulties of access are exacerbated for older women from culturally and linguistically diverse communities. By 2026 it is estimated that around 25% of older people will be from CALD backgrounds, with many having a language other than English as their home language.

Prevention of homelessness in communities with high levels of hidden homelessness- such as is the case with older women and some CALD groups - requires programs with extensive capacity for outreach.

There is however one feature of the Commonwealth aged care system we believe deserves further investigation. WEL and OWN see considerable potential for NSW to advocate to the Commonwealth for an expansion of the Commonwealth funded Assistance with Care and Housing for the Aged program (ACHA), widening eligibility to encompass older women 45 years and older.

⁷ Pederson,M; Parsell,C;Phillips,R;White,G AHURI,2015

The AHURI research reported in *Preventing Homelessness* was an evaluation of the challenges faced by providers under ACHA. Operating across Australia since 1992–93, it assists older people who are at risk of becoming homeless, or are already homeless, to remain in the community through accessing appropriate, sustainable and affordable housing, and linking them to community care and supports where appropriate.

The program is funded by the Australian government and implemented by community agencies, local government and aged care providers working *within* the community.

The ACHA program model integrates services and represents a contemporary homelessness prevention approach, with the provision of housing at its core combined with aged care and community services support.

ACHA agencies span diverse communities in different areas, but all take this integrated approach. Practitioners possess integrated knowledge of the housing, aged care and welfare sectors alongside specialist skills in understanding and respecting older people's needs, culture, and existing strengths. They undertake holistic assessments of older people who access the service, are expert in determining appropriate housing arrangements, assisting people to sustain housing through negotiating with landlords around rent arrears and housing modifications, liaising with ACAT teams, referral to legal advice, mental health support and counselling and securing local housing together with practical assistance such as white goods, furniture etc.

This is an excellent model for responding to actual and potential homelessness amongst older people. The National Foundation for Australian Women has commended the outreach focus of this program as a 'highly cost effective model to prevent homelessness and quickly house older people at a high risk of homelessness⁸.

Conclusion

WEL and OWN believe that there is a window of opportunity for the NSW government to lead Australia in refining its responses to women leaving domestic violence and in tackling homelessness amongst older women through building on innovative policies, programs and initiatives, as outlined in this submission.

⁸ National Foundation for Australian Women: Submission to Senate Inquiry into Affordable Housing No38

