



Submission to:

Establishing a 10-Year Strategy for Social and Affordable Housing Discussion Paper

April 2021

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Executive Summary

Housing for the Aged Action Group (HAAG) welcomes the opportunity to respond to the Victorian State Government's 10-Year Strategy for Social and Affordable Housing sector consultation paper (the consultation paper). In making this submission we drew on our experience and expertise working with and for older people experiencing or at risk of homelessness for over 30 years. This submission is informed by the contribution and experience of our members and through extensive consultation with our reference groups, the Cultural Diversity Reference Group and the Retirement Accommodation Action Group and the Older Lesbian, Gay, Bisexual, Transgender and Intersex (LGBTI) working group.

Older women are a fast-growing cohort of people experiencing homelessness, as found by the Victorian Parliamentary Inquiry into homelessness, however the unique housing needs of older people are barely acknowledged in the consultation paper. Whilst the consultation paper lists the elderly as one of four areas under 'changing profile of need', HAAG is concerned that older people experiencing or at risk of homelessness are not identified as a group requiring specialist support, pathways and housing outcomes. This lack of recognition and support is evident at a community and service delivery level, with only two of the 492 Specialist Homelessness Service agencies in Victoria funded as specialists for older people.

We support the vision: for all Victorians to have access to a safe, affordable and appropriate home and we call upon the Government to prioritise older people's housing needs in the new 10-year vision. The \$5.3 billion Big Housing Build is an exciting opportunity for the Government to provide tailored policy and investment responses to meet the housing needs of older people experiencing or at risk of homelessness, however, an ongoing commitment is required.

The Government must take steps to produce more housing that is suitable for and available to older people at risk of homelessness. This could mean reinvestment in the Independent Living Unit (ILU) sector, changes to social housing eligibility, further increases in housing stock, targeted shared equity initiatives and/or support to scale pilot projects.

The assumption built into the Australian retirement housing system is that on retirement, people own their own home. Increasingly, this is not the case and for women it is even less likely. The significant gap in wealth and asset accumulation between men and women as well as caring responsibilities, employment and superannuation is a gendered problem. Inadequate welfare and pension payments do not cover basic living expenses particularly for those in the private rental market. The pension age has steadily increased, leaving many older people reliant on very inadequate JobSeeker payments. We urge the Victorian Government to advocate for reassessment of the assumptions underpinning the retirement housing system and for welfare and pension payments that cover basic living expenses and allow older people to live with dignity.

HAAG is committed to early intervention, identifying those older people at risk of homelessness and providing support before they reach a crisis point. We support the Parliamentary Inquiry into Homeless Recommendation 7, to prioritise early intervention activities and advocate strongly for service providers to increase their awareness and understanding of the housing needs and options for older people at risk of homelessness.

And finally, it is important to note that older people have been disproportionately affected by COVID-19 and suffered terribly from isolation, cessation of services, loss of income, limited mobility, access to information and now increased evictions from private rental properties. The pandemic has exposed the cracks in the housing system and the highlighted the critical link between safe, secure and affordable housing and good health and wellbeing, particularly in older age. This reality underpins the importance of the Victorian Government recognising older people experiencing or at risk of homelessness as '*people at the centre*' of the 10-Year Strategy for Social and Affordable Housing.

Recommendations

1. Specifically recognise older people's right to housing and their unique housing needs. Older people and women in particular are the fastest growing cohort of homeless people and urgently require targeted responses across the spectrum of housing policy, services and investment.

Pathways

2. Support early intervention via community engagement to reach older people before they hit a housing crisis.
3. Expand HAAG's Home at Last service across Victoria, including additional funding to ensure older peoples unique housing needs are catered for and to support Culturally and Linguistically Diverse (CALD), Aboriginal and Torres Strait Islander and other vulnerable communities.
4. Fund HAAG's retirement housing service to be a central information hub to collate and distribute information about ILU vacancies and eligibility criteria and provide navigation support.
5. Support collaboration and referral pathways between the aged care, housing and homeless, family and domestic violence and health care sectors to develop early identification and service integration for older people at risk of homelessness.
6. Simplify housing application processes, using plain English and recognising the technological barriers for older people and people from CALD, Aboriginal and Torres Strait Islanders and other vulnerable communities.
7. Provide low/income asset older people with access to housing that is "affordable" according to their means.
8. Restore and adequately resource the dedicated Complaints and Appeals Office in order that public tenants can have problems swiftly dealt with when they are beyond the resolution powers of the local housing office.

Communities

9. Increase social and affordable housing options for older people particularly in areas that allow maintenance of social and cultural networks, access to transport, health and other services, employment for those who have not retired, and green space.
10. Fund data collection and research to identify the population size and demographics of the "missing middle"; how many Victorians over 55 at risk of homelessness are ineligible for social housing because of savings or assets above the asset limit
11. Elevate the voices of public and community housing tenants by funding local or estate-based tenant groups to support community programs and tenant advocacy, without having their funding jeopardised by strong advocacy.

Growth

12. Build more social and affordable housing that meets the needs of older people, including investment in the not-for-profit ILU sector.
13. Invest in ILU housing that includes a balance of small private residences and communal space.
14. Ensure that all public land currently used for public housing is retained for renewal and expansion of public housing.
15. Implement mandatory Inclusionary Zoning across Victoria.
16. Reform of residential tenancy laws to include rent control measures and security of tenure.

17. Regulate community housing providers management standards so that tenancy selection, rent setting, modifications and transfers align with public housing management standards.
18. Develop models of shared equity housing for older people.
19. Ensure all new and existing public, social and affordable housing complies with universal design principles, ensuring access for older people and in recognition that they are also likely to live with a disability. Housing should also meet climate change 7-star rating environmental standards.
20. Extend the scope of the Royal Commission into Family Violence Recommendation 20 so that the Victorian Government reports annually on the extent of unmet housing demand among people affected by elder abuse, and proposed actions for meeting the continuing housing demand from older people affected by elder abuse.
21. Rural and regional allocations of Big Housing Build investment and any future investment in housing must include criteria which prioritises housing in areas of the greatest need, noting that some regions and cohorts of high need have missed out.

Partnerships

22. Improve consultation and engagement with older people at risk of homelessness by working through existing groups like HAAG where participants are already connected and empowered to participate.
23. Ensure smaller, specialised community housing providers are provided opportunities to build new social and affordable housing via the Big Housing Build and do not miss out to the larger providers.

Background on Housing for the Aged Action Group (HAAG)

HAAG is member-based, community organisation specialising in the housing needs of older people. The organisation has over 500 members actively campaigning for housing justice. HAAG's service arm is the Home at Last (HAL) service which provides a one-stop shop of housing information, support, advice and advocacy for Victorians over 50 years of age. This assistance is provided through an intake and referral service assisting over 1,000 people per year. We also provide outreach support to re-house older people who are homeless or at risk of homelessness into long term affordable, age-appropriate housing. Our intake and outreach program is partially funded under Assistance with Care and Housing (ACH), a sub-program of the Commonwealth Home Support Program.

We have an early intervention and prevention approach to homelessness, which involves providing community and professional education to alert people to what places older people at risk of homelessness and pathways to support. Since 2015, we have had a strong Cultural and Language Diversity focus, and a team of bilingual workers who provide community education to groups of older people from a non-English speaking background. We have recently expanded this program to include peer educators, who have a lived experience of homelessness, and we are now starting work with the LGBTI community.

Since January 2019, we have been an information hub for the Aged Care Service Navigator trial, run by Council on the Ageing (COTA) Australia. We are one of the only information hubs providing face-to-face one-on-one support in the home or in our office to assist older people to register with My Aged Care. This has given us a unique insight into the difficulties in gaining access to the Aged Care system for people at risk of homelessness.

We are currently partnering with academic institutions to conduct research into the effectiveness of training aged care assessment staff to recognize people at risk of homelessness and make an early

referral into our ACH program. We also have a national project, funded by the Wicking Trust, which is raising awareness and advocating with and for the housing needs of older people across Australia.

HAAG's consultation to inform this submission

HAAG is committed to elevating the voices of older people in all our work. To inform this submission, we held specific consultations with groups of older people to discuss the Ten Year Affordable Housing Strategy discussion paper. These groups were:

- Cultural Diversity Reference Group – a working group of HAAG which meets monthly and whose membership includes bilingual community leaders from our target communities.
- Retirement Accommodation Action Group (RAAG) – a working group of HAAG which meets monthly and whose membership includes residents of retirement housing, such as, ILUs, residential parks and caravan parks.
- The “Missing Middle” – a consultation with older women who are over the asset limit for social housing but who do not have enough savings for any other housing type and are at risk of homelessness.
- LGBTI older people – two consultations, one online and one face to face, for older LGBTI people to tell us about their housing circumstances. This group forms part of our LGBTI housing project.

We also drew on our previous submissions, notably [HAAG's Submission to the Victorian Parliamentary Inquiry into Homelessness](#), research and policy briefs, which can be found on our website www.olderrentants.org.au.

Unpacking the problem: older people experiencing or at risk of homelessness

An ageing population

- Currently more than 15% of Victoria's population are older people.
- The number of Victorians aged 65 and above is set to triple by 2058.
- By 2057, people aged 65+ are expected to make up 22% of Australia's population.
- The population is living much longer, with people aged 85+ increasing 153% compared with 32% overall population growth.

Increasing older homelessness

- There has been a steep increase in the numbers of older people who are both homeless and at risk of homelessness in Victoria between 2011 and 2016.
- Australia-wide, there were a total of 116,427 people over 55 who were homeless on Census night 2016.
- Older people in the 55-74 age bracket are the fastest growing cohort within the overall homeless population. (Australian Homelessness Monitor Overview, 2018). There were close to 3,311 people in Victoria who were over 55 and homeless on census night in 2016. This has risen from 2100 in 2011 and was an increase of 57.6%.
- In Victoria, in the 5 years between 2011 and 2016, there was a 70.8 % increase in the number of women between 65-74 who reported being homeless, and a 61% increase in women aged 75 years and over.
- 120,000 women aged 45 and over are estimated to be at risk of homelessness in Victoria¹.

- Homelessness for older people is often hidden. Many of those who are homeless are living in poor quality, temporary housing such as caravans, couch surfing or living with family in unsuitable, violent or overcrowded conditions.
- Older people need stable housing in order to “age in place”. This cannot occur in private rental where the medium turnover is currently 1.4 years in metro Melbourne.

Older homeowners decreasing

- There is a long-term trend of reducing numbers of older people who own their homes. In 1995, 85.1 % of people aged between 55-64 years owned their own home, and 85.2% of those aged over 65. By 2014 these figures had dropped to 80.4% and 84.5% respectively.
- The number of people approaching retirement or who have already retired without paying off their mortgages is increasing significantly. Between 1996 and 2014, the number of homeowners aged 55-64 with a mortgage debt had tripled to 44.5%.
- The number of homeowners aged 65+ with outstanding mortgages has doubled to 9.7%.

Affordable housing in decline

- In Victoria, social housing currently provides accommodation to just 3.5% of the population.
- Public housing supply has not grown to meet demand, instead public housing stock declined by 581 dwellings between 2006 and 2016, due to the disposal of 6466 dwellings, mostly through demolition and sales.
- Though community housing stock has increased by 9593 dwellings, or 81% during this period (taken together as a 12% increase in social housing stock), it has not kept up with household growth.
- Between 2011–12 and 2015–16, the Australian Government’s real expenditure on Commonwealth Rent Assistance (CRA) increased by around 23%, from \$3.6 billion to \$4.4 billion.
- In 2017, 42% of CRA recipients were still in rental stress.
- The number of people on the Victorian Housing Register increased by around 1,833 applications in the first three months of 2019 alone. In March 2019 in Victoria, there were 48,925 applications for public housing, including transfers.
- The stock of ILUs is in serious decline as the only option that meets the long-term needs of older people in the “missing middle”. In our recent ILU database update, we found that 48% of ILUs were closed, uncontactable or turned into residential care.

More older people are living in insecure and unaffordable rental housing

- The number of older private renters is set to more than double over the next 15 years.
- Australia-wide, the number of private renters aged 65 and over will increase from 246,439 in 2011 to 581,134 in 2031 – a jump of 131%. This represents the greatest tenant population increase of any age group during this period.
- Without adequate public housing, older people renting on low incomes will largely be at risk of homelessness.
- Across Australia, 45% of older women who rent spend more than 30% of their income on rent.
- In 2016, 132,300 renters over 65 years were experiencing rental stress, representing a 42% increase from the 2011 Census.

- Anglicare in their 2018 rental 'snapshot' found that only 1.9% of rental properties in Victoria were affordable for a single person on an aged pension.

Elder abuse is increasing, and the lack of affordable housing is a contributing factor

- The Royal Commission into Family Violence stated that “meeting the accommodation needs of older women (and some older men) with limited financial resources may be the only effective way of protecting them from violence. For those who choose to leave their homes, an increase in appropriate and affordable housing is needed.”
- Home at Last service data has shown a 50% increase in elder abuse and family violence cases over the last financial year.
- Seniors Rights Victoria’s submission to the Royal Commission into Family Violence recommended improved housing options for both older women and perpetrators of elder abuse to improve outcomes for victims.
- National Ageing Research Institute (NARI) research into the outcomes of interventions into elder abuse recommended a review of affordable housing options for older people and adult children to address the need for accommodation options to escape abuse.

The homelessness and aged care service system does not provide the help older people need

- There are 492 Specialist Homelessness Service agencies in Victoria but only two funded as specialists for older people.
- HAAG’s Home at Last is a highly successful housing information and support service for older people but has not been incorporated into an overall homelessness service strategy to provide early intervention assistance with a focus on achieving long term housing outcomes.
- The ACH Program provides an effective model of support and assistance for older people but is poorly funded, has fragmented geographical coverage and lacks consistent service approaches.
- The aged care system is well positioned to be a first line of assistance to older people at risk of homelessness but does not routinely include housing problem identification as part of its assessment framework.
- All the above service systems lack integration and comprehensive responses to the housing problems facing many older people on low incomes.

Principles

People at the centre

HAAG supports the principles which underpin the Strategy, in particular, we call upon the Government to recognise older people experiencing or at risk of homelessness as ‘*people at the centre*’. Older people face unique challenges in addition to housing affordability: mental illness, disability and poor health, unemployment and underemployment and age discrimination. If the Strategy recognises the unique housing needs of older people, it will prioritise differentiated, tailored responses. Older people’s ‘client voice’ must be placed at the centre of planning and designing housing responses, informing practice across information, early intervention and navigating housing options.

Shared action and accountability

HAAG is committed to advocating for the housing needs of older people experiencing and at risk of homelessness and building capacity in other organisations who play a role in planning and delivery

of social and affordable housing. Few housing organisations are equipped to respond to the needs of older people, with only two of the 492 Specialist Homelessness Service agencies in Victoria funded as specialists in this area. To achieve the vision and with ‘older people at the centre’ government, service providers, business and community groups need to have increased awareness and understanding of the housing needs of older people.

Maximising value

HAAG support initiatives that are informed by data and evidence and deliver the best outcomes and value for Victorians.

A simple direct investment in public housing has been demonstrated to provide maximum value for the government and for the public. Inclusionary zoning is a simple and cost-effective mechanism to ensure an increase in affordable and social housing, without the need for cash handouts to private developers. With this in mind, we encourage strong and transparent governance around investment to ensure value-for-money outcomes and streamlined delivery of projects.

Sustainability

HAAG supports the Strategy’s sustainability principle, particularly in regard to ensuring public, social and affordable housing complies with universal design principles, ensuring access for older people and in recognition that they are also more likely to live with a disability. It is also essential that housing is adapted for climate change and meets 7-star rating standards. Older people, especially those aged over 75 years, living alone or in poverty, are identified as a vulnerable group in heatwaves.

Recommendation 1: Specifically recognise older people’s right to housing and their unique housing needs. Older people and women in particular are the fastest growing cohort of homeless people and urgently require targeted responses across the spectrum of housing policy, services and investment.

Focus Areas

Focus Area 1: Pathways

Q - What actions will enable people to access social housing, sustain their tenancies, and move between different housing options as their needs change?

Q - What are the most important features of affordable housing? (e.g. prices, location, security of tenure, access to transport or daily amenities, connections to support services).

Q What actions will support people to find and obtain an affordable home?

“It is so hard to navigate your way through systems; I don’t even know which ones exist? I try hard in rented accommodation paying 60% of my pension. Then I have to move all the time because the property is sold, or the owners come back from overseas. Looks like I will have to move again, twelve-fifteen months after I have moved in to this place. I am 72 years old, have chronic fatigue and osteoporosis and cannot physically do this much longer. I am at giving up point. What can the system do for me?” (Feedback from participant at A Home to Age Well, HAAG-COTA forum, April 2016)

Older people are not at a stage of life where they can easily move between different housing options or along the housing continuum (as arguably younger people can). Moving house is costly and physically and emotionally demanding. Older people require a permanent home. This is not recognised in the consultation paper, which reflects the needs of younger people who have a life ahead of them and the prospect of earning a living and improving their circumstances.

Older people are looking for a range of “affordable” housing options, security of tenure and the potential to “age-in-place”, in locations that allow for maintenance of social networks, access to

transport, health and other services, employment for those who have not yet retired, and green space. They require specialised housing information and support to navigate the housing system, including access to interpreters and resources in languages other than English.

Recommendation 2: Support early intervention via community engagement to reach older people before they hit a housing crisis

"I didn't bother going to services. I understand my own homelessness... thought I'd rather live with friends and family than go to service." (HAAG's LGBTI consultation, Feb 2021)

HAAG's Home at Last service takes an early intervention approach to identify and target communities who are more vulnerable to homelessness. For example, CALD communities face significant difficulties in accessing appropriate and affordable housing options. There are cultural and systemic barriers to accessing support which are influenced by how long a person has lived in Australia, fluency in the English language and availability of information for CALD communities in their specific language. HAAG engages with target CALD communities via:

- HAAG Community Advocates: trained, bilingual community leaders who work as volunteers within their community to share information about HAAG and the Home at Last service. They can recognise when a person needs help with housing and, with their consent, make a referral to Home at Last via a single, nominated worker.
- HAAG Cultural Liaison workers: more than interpreters, Cultural Liaison workers understand the cultural nuances and can explain processes in ways that make sense in the cultural context. This role is used in very small communities where interpreters are hard to come by and where establishing rapport and a personal connection helps. Cultural Liaison workers often attend home visits with HAAG Housing Support workers, when the client is from his/her community (with the client's consent).
- HAAG Cultural Diversity Reference Group: comprises HAAG Community Advocates and meets monthly. The Reference Group provides a forum for Community Advocates to share information about community needs, gaps in service provision and experiences using the Home at Last service. The forum also provides an opportunity for HAAG to share information about the ever-changing Victorian housing system, housing options and any new initiatives.

Pre-COVID, HAAG also held in-language community education sessions. These began as part of a 2015 Project, 'Preventing Homelessness in Older CALD Communities', and have been continuing ever since. These sessions offer tailored information which has been designed collaboratively with cultural reference groups from six communities. Case studies from the communities (which have been made into films) are used to emphasise some of the cultural aspects of being at risk of homelessness. For instance, in some communities the common experience of being at risk of homelessness may be living with family (adult children) in an elder abuse/conflict situation, whereas for other communities, most older people who are at risk of homelessness are renting on their own.

Many people who attend community education sessions are not at the point of housing crisis. However, they can use this information if they do face a crisis in the future. Perhaps the greatest benefit of the community education sessions is that they help to erode stigma in the community about those facing homelessness, which means people feel more able to seek services at a point where they can prevent a housing crisis, rather than during a crisis. It may take multiple community education sessions before the community lets the stigma of a housing crisis go. For instance, in one Indian community group, three community education sessions were delivered. At the first session, the group was silent at the end. No one asked any questions. At the second session, people started talking about people they knew who were experiencing stress or elder abuse in their family home and wanted to leave and live alone. By the third session, people were talking openly about their own experiences of housing stress and crisis and seeking help from the HAAG worker. 60% of Home at Last's clients are from CALD communities and 60% of those are women.

There are many communities vulnerable to homelessness that HAAG is not reaching. For example, recent research has highlighted the high levels of homelessness, housing insecurity and risk of homelessness amongst older LGBTI people. HAAG has received some limited philanthropic funding to reach this group. Further work is required to raise awareness amongst older LGBTI communities about the risk factors for homelessness, provide information and support for early referral before a housing crisis, including planning for retirement and affordable and secure housing options for LGBTI older people.

Further research is required to identify different vulnerable groups, including older people with disabilities, from CALD backgrounds, who are LGBTI, who have experienced family violence, Aboriginals and Torres Strait Islanders and women.

Recommendation 3: Expand HAAG's Home at Last service across Victoria, including additional funding to ensure older peoples unique housing needs are catered for and to support CALD, Aboriginal and Torres Strait Islander and other vulnerable communities.

"I went to crisis service and presented as homeless and asked if I have a social worker. It was like a call centre - here I am homeless, unsafe and trying to get onto the housing list and I cannot even speak to the same person twice. I become invisible and disempowered" (HAAG's LGBTI consultation, Feb 2021)

The HAAG Home at Last service model demonstrates that improved housing outcomes can be achieved for low income/asset older people. Those in a housing crisis are provided with one-on-one support to access appropriate and affordable housing. Older people are also helped to access support earlier and plan for their future before reaching crisis point.

Evaluation of the service by KPMG found it to be a cost-effective way to help older people secure housing and divert demand from specialist homelessness services.

A specialist service is needed as many older people at risk of, or experiencing, homelessness have not previously engaged with the social service system. They have conventional housing histories and are experiencing homelessness for the first time.

Older people speak of a combination of shame and fear in approaching homelessness services. In their contact with service providers, they have experienced a lack of understanding of their situation and their housing options. Often, they are referred on, or told that they are not eligible for help. Many low-income older people have limited access to the internet. For those that do use technology, the available information is overwhelming. Eligibility criteria for access and support is often unclear.

We already have specialist homelessness services for other groups of people, but older people at risk need early support to avoid a housing crisis. For those already in a housing crisis, information and support is needed to gain appropriate long-term housing from workers with strong knowledge of the housing and aged care systems.

Core elements of the Home at Last service model include:

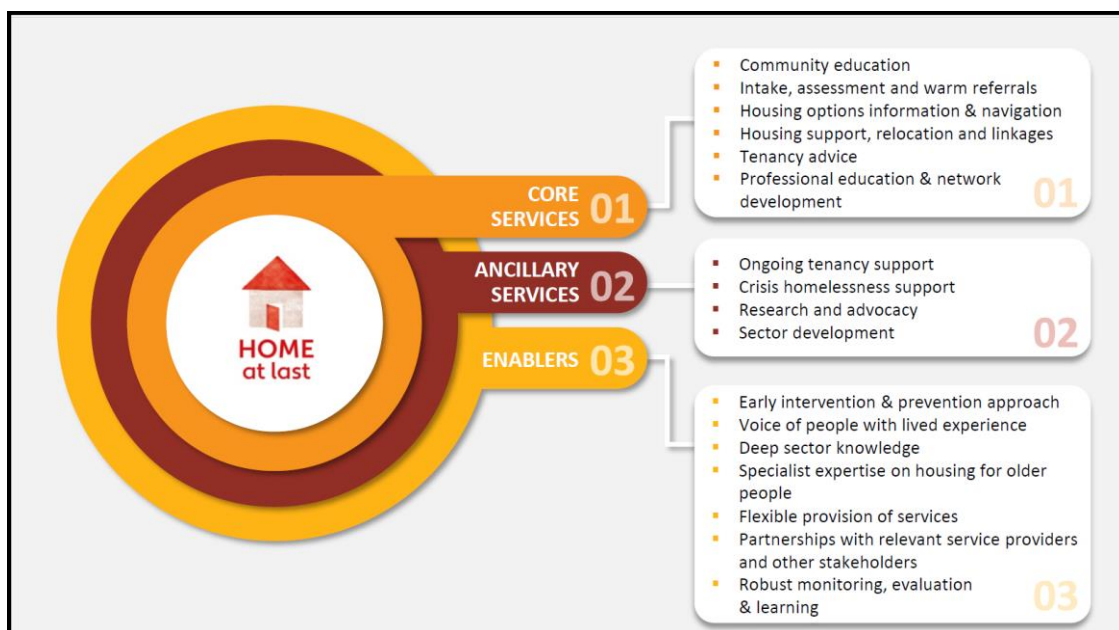
1. **Community education** – Targeted community education sessions run for both the general community, and specific communities. The community education sessions delivered to specific communities, are delivered in a way that increases access to the sessions for the relevant community, for example, for CALD communities' education sessions are delivered by bilingual educators through ethno-specific organisations.
2. **Intake assessment and warm referrals** – One-on-one appointment to discuss clients' unique circumstances and options. This can be undertaken in-person at the client's home if desired. Warm referrals to other supports may also be made at this stage.

3. **Housing options information & navigation** - Information provided on all forms of housing (including retirement housing) and assistance given to navigate the housing options.
4. **Housing support, relocation and linkages** – One-on-one support through the housing application process, attending offer interviews, providing support during relocation and providing support post housing. Assistance to help people physically move and set up their new home and linking them to local services close to their new home. Support includes providing brokerage services to clients to assist them to get ‘on their feet’ in their new home, for example finance to purchase furniture and whitegoods, and assistance to pay outstanding debts. Providing information and assistance about relevant community services. For example, information and assistance about how to access My Aged Care, income assistance, health care and social support linkages.
5. **Tenancy advice** - Advice provided on a client’s current tenancy situation and options. If a relevant provider exists, a referral will also be made for ongoing tenancy support to the relevant provider.
6. **Professional education & network development** - Professional education sessions provided to other services in the system to educate them on the issues facing older people at risk of homelessness. Developing networks with other services in the system, to facilitate further referrals for Home at Last clients.

Enablers of the service model include:

7. **Early intervention approach** – Focus on early intervention and prevention which ensures clients access help earlier and therefore reduces the number of clients needing to access crisis and homelessness services.
8. **Voice of lived experience** - Embedding the voice of people with lived experience to deliver a more tailored and relevant program. For example, using peer educators to deliver community development sessions, the membership base (past clients) participate in the organisation once securely housed and empower each other to work together towards housing justice outcomes.

Box 1: HAAG Home at Last service model



The Home at Last service currently offers state-wide housing options information and referral. Other service elements are only available in metropolitan Melbourne and Barwon Region. We recommend expanding all elements of the service across Victoria.

Recommendation 4: Fund HAAG’s retirement housing service to be a central information hub to collate and distribute information about ILU vacancies and eligibility criteria and provide navigation support so that older people at risk of homelessness understand their housing options.

Margo is looking for an affordable housing option. She’s not on the social housing waiting list, as she is not eligible, and still works part time. She cannot find much information on ILUs and had to call each one separately. She says “there needs to be an organisation or a list for ‘the missing middle’ because we are invisible. There are so many in this group, but no-one is acknowledging us. The problem is, you either need a lot of money to buy in, or no money at all. I fit in the middle.” (Margo, HAAG Reference Group consultation, March 2021)

ILUs are, essentially, not-for-profit retirement villages; communal rental housing provided by community organisations for older people with limited incomes and assets. From 1954 until 1986 the sector was subsidised under the Aged Persons’ Homes Act (APHA) and during that period around 9,000 units were built in Victoria, including the vast majority of the state’s remaining ILU stockⁱⁱ.

Because ILUs offer a high level of security of tenure, affordable rent, and require either low, means-tested, or no in-going contributions, HAAG has often seen ILUs as the only option that meets the long-term needs of older people in the “missing middle”. The “missing middle” is a growing cohort of older people who do not own their own home but have savings or assets above the social housing asset limit of \$34,656. They are not wealthy enough to buy their own home or fund a place in a retirement village but are also not impoverished enough for social housing. This leaves them with radically fewer options and most housing and homelessness services simply will not assist them.

As the ILU sector has not been funded since the mid-1980s the stock is in serious decline. Early findings from HAAG’s research suggests that around 50% of Victoria’s ILUs are no longer in service. Many ILUs have closed, often shifting to the provision of residential aged care as a more financially viable business model. Many of the ILUs that still exist are generally older and often in need of major repairs and maintenance. In many cases, the stock also does not meet contemporary standards, in particular related to accessibility – a surprising number of ILU units are ‘walk-ups’.

The ILU sector sits outside the Victorian Housing Register, with vast differences in the eligibility, vacancies and access between ILU providers who are independent of each other and of the housing sector more broadly. HAAG has been unable to determine the size or vacancy rate of the remaining ILU stock, but it is clearly inadequate to the scale of demand and this inadequacy continues to intensify as demand increases and supply dwindles.

Recommendation 5: Support collaboration and referral pathways between the aged care, housing and homeless, family and domestic violence and health care sectors to develop early identification and service integration for older people at risk of homelessness.

Both the housing and homelessness system and the aged care system are complicated and difficult to navigate. Homelessness services are oriented towards a crisis response, providing emergency relief and very short-term accommodation; they often do not have the time to help someone with a housing application. Likewise, the aged care system is also stretched. The focus is on things like assessing fall risks, home care and residential care, and they often do not think about housing. Neither system serves the needs of older people at risk of homelessness. So older people get bumped around, referred on and often feel disrespected and condescended to. HAAG is in the unique position of straddling these two systems.

Effective collaboration improves housing and wellbeing outcomes for older people and will be achieved by:

- Embedding an older persons' specialist housing worker in every housing and homelessness service and Family Violence Support and Safety Hub.
- Providing relevant government agencies and service providers in aged care, housing and homeless, family and domestic violence and health care sectors with specific training on the housing needs of low income/asset older people and develop specific service responses to ensure access is available to all groups.

Recommendation 6: Simplify housing application processes, using plain English and recognising the technological barriers for older people and people from CALD, Aboriginal and Torres Strait Islander and other vulnerable communities.

"We need to make the information that we give simple because sometimes it can be too much and it can be confusing. We need to keep repeating in different ways to make sure the message is very clear. We need to use case studies. Some people are too stressed to take in the information."
(Participant in Cultural Diversity Working Group consultation)

HAAG's Home at Last service assists older people to apply make applications to the Victorian Housing Register and has first-hand experience of the barriers to access for older people. Online application processes are difficult for older people who lack digital literacy, and can't afford internet connectivity, which creates a digital divide. The number of questions, confusing eligibility criteria and burden of proof (for example, Special Accommodation Requirements) creates additional barriers for older people. Individual support is required for older people, particularly those with additional vulnerabilities such as speaking a language other than English. The additional time taken to use interpreters to assist older CALD people needs to be acknowledged in funders reporting requirements.

Recommendation 7: Provide low income/asset older people with access to housing that is "affordable" according to their means.

The Planning and Environment Act 1987 defines affordable housing as 'housing, including social housing, that is appropriate for the housing needs of very low, low and moderate income households'.

Commonly, housing expenses of up to 30 percent of gross household income is deemed affordable. This applies to low income/asset older people. Housing that is offered at 20-30% lower than market rent is not necessarily "affordable" and should not be defined as such.

Recommendation 8: Restore and adequately resource the dedicated Complaints and Appeals Office in order that public and community housing tenants can have problems swiftly dealt with when they are beyond the resolution powers of the local housing office or housing provider.

We support Save Public Housing Collective's demand for an improved process for resolving tenant issues and call for this to be available to community housing tenants.

Focus Area 2: Communities

Q What actions will strengthen social and affordable housing communities?

Recommendation 9: Increase social and affordable housing options for older people particularly in areas that allow maintenance of social and cultural networks, access to transport, health and other services, employment for those who have not retired, and green space.

"You set people up to fail when you remove them from their community and supports" (Hoda, Cultural Diversity Group consultation, March 2021)

“I was gentrified out of Brunswick... there is not many people like me out here. Not being with your community has impacts on your identity. We need the connections and the community we choose” (Jane, HAAG’s LGBTI consultation, Feb 2021)*

Our consultations with older people via our Cultural Diversity Reference Group, Retirement Housing reference group, LGBTI older people and the “missing middle” group strongly support housing to be built in areas with which they are familiar and well-connected. This is crucial for mental health, and to age well.

Recommendation 10: Fund data collection and research to identify the population size and demographics of the “missing middle”; how many Victorians over 55 at risk of homelessness are ineligible for social housing because of savings or assets above the asset limit

Maria is 79 and lives in private rental in Greensborough. Her real estate agent has told her that her landlord intends to demolish the house she rents early in the new year and she will have to move out. Her landlord has given her more than the minimum notice period because she has been a good tenant for many years, and they know it will be difficult for her to find a new home. As a single woman on an Age Pension, most private rental properties will be unaffordable for Maria. She also has accessibility requirements which will make it harder to find a suitable home. She has modest life savings of \$75,000— this is her real problem.

People who retire without owning their own home and with a small amount of assets are ineligible for social housing yet cannot afford other housing options – this group is the “missing middle”. Women are disproportionately represented in the “missing middle” due to gender disparities in wages, workforce participation and superannuation.

Nobody, so far as we can tell, tracks the number of people in this group. They fall through the gaps in data collection just as much as they do in the housing and homelessness system. And yet, every week, HAAG provides information about housing options to older people in the “missing middle” who are at risk of homelessness. Our research has indicated that only a small number of these people will actually be securely housed based on this informationⁱⁱⁱ. In most cases, the best outcome for these people is to erode their savings paying private rent, move house every few years facing the stresses of moving as landlords decide to sell, renovate or increase the rent. Some will eventually access social housing when their savings are sufficiently depleted. Some will resort to couch-surfing, housesitting and other insecure tenure types. Some will enter residential aged care prematurely for want of other options.

Data collection and research on the “missing middle” will support appropriate policy responses, which could include increasing the asset limit for social housing.

Recommendation 11. Elevate the voices of public and community housing tenants by funding local or estate-based tenant groups to support community programs and tenant advocacy, without having their funding jeopardised by strong advocacy.

A public and community housing system needs to place tenant rights and needs at the centre, and this includes actively supporting tenants and championing public housing as a social good. We support the re-instatement of a model of tenant representation that includes local and estate-based tenant groups, and a peak body representing them, that is fully funded.

Focus Area 3: Growth

Q What actions will enable and deliver growth in social housing?

Q What do we need to do to ensure housing supply meets the needs of people with specific support and housing needs?

Q What do we need to do to enable a well-functioning affordable housing system that provides rental and home ownership opportunities for those that need them?

Recommendation 12: Build more social and affordable housing that meets the needs of older people, including investment in the not-for-profit ILU sector.

“There are no one bedroom affordable houses available. If you’re single, that’s all you need but developers keep building three, four-bedroom houses which are unaffordable. This is a government issue, the government needs to take responsibility for making the rules about what houses are built” (Dianne, HAAG Reference Group consultation, March 2021)

“As an older gay man, with a long term mental illness diagnosis, a stable home is very important to my health. Living in private rental is expensive and I’m concerned for my future security if I can no longer work and afford the rent.” (Tom, 61 years, HAAG’s LGBTI survey, 2019)

Whilst public housing was once the home of Australia’s working people, it has become a residual system, housing only the most vulnerable, and even then, with no great urgency. If we had a sufficient level of public housing stock, where those of retirement age or unable to work due to age discrimination or disability could access housing at the first signs of housing stress, we would all but eradicate homelessness for older people. The older people who come to the HAAG Home at Last service very rarely have complex issues that make tenancies or housing generally unmanageable. They simply want a home where they can age with dignity and security.

In Victoria, social housing currently provides accommodation to just 3.5% of the population^{iv}. The stock of public housing has not grown to meet demand, instead public housing stock declined by 581 dwellings between 2006 and 2016, due to the disposal of 6,466 dwellings, mostly through demolition and sales.^v Though community housing stock has increased by 9,593 dwellings, or 81% during this period (taken together as a 12% increase in social housing stock), it has not kept up with household growth (see table below).^{vi}



In 2018, approximately one-third of social housing tenants in Australia were aged 55 years and over, representing 35% of tenants in public housing, and 30% in community housing. With an increasing aged population, decreasing homeownership, and a private rental market that is increasingly unaffordable the demand for social housing is expected to steadily increase. Notably, the Australian Housing and Urban Research Institute have projected that by 2031 the unmet demand for social housing for this age group alone is likely to increase by approximately 78%, from 2016 figures.

Without significant ongoing investment into increasing housing stock we will see the housing crisis deepen. According to Dr Judy Yates (2017), *“Over 30,000 additional dwellings need to be added in the next 20 years if Victoria is to maintain long-term social housing at the current rate of 3.5%. This translates to an increase of around 1,600 to 1,700 dwellings each year to 2036, with approximately a further 100 extra homes added to the short to medium-term rental stock to maintain the current level of social housing.”*

In December 2016, Victoria’s 30-Year Infrastructure Strategy estimated that between 75,000 and 100,000 low-income households do not have access to affordable housing. Given this huge backlog and that the current level of social housing coverage does not adequately prevent homelessness or even house those who are already homeless, HAAG recommends 10,000 new social housing dwellings per year be built for the next 10 years.

Recommendation 13: Invest in ILU housing that includes a balance of small private residences and communal space.

“I’d like to be living in a communal setting but with private rooms and an option for shared space and a shared garden. Outdoor areas must be part of new builds. I live on my own and I’m happy with that, but I can get housebound, so if I can step out into a communal space and be with people, it’s good for my mental health. It gives confidence in the public domain. When I feel well, I can contribute to the community.” (Ruby, HAAG Reference Group consultation, March 2021)

Our consultations with older people, particularly older women, consistently report that small clusters of housing, with access to both private and communal spaces, is desirable. Funding for “affordable” housing should include investment in this type of housing, earmarked for people aged 55 years and older. In a recent survey by United Housing Co-operative, supported by HAAG, 78% of those surveyed indicated that they would be interested in a community garden, if it was available, and 83% would support sustainability projects like recycling, composting, solar power and water tanks.

Recommendation 14: Ensure that all public land currently used for public housing is retained for renewal and expansion of public housing.

According to an Australian Housing and Urban Research Institute study, direct government investment in public housing is far and away the most efficient model for providing affordable housing, and even more so when the land is already owned by the government. Direct investment reduces risk because it does not rely on commercial providers. Rather than gifting government land to private commercial operators, government land should be retained for government owned and managed housing. The Centre for Urban Research examined the Big Housing Build commitment and found that if the \$2.14bn was spent on direct investment in public housing, it would deliver approximately 7,100 dwellings, and the asset (land and housing) would remain in public ownership, delivering significantly reduced costs in other areas of housing, health and social services.

Recommendation 15: Implement mandatory Inclusionary Zoning across Victoria.

Recent research by the University of Melbourne and the City of Melbourne highlights the lack of housing delivered through existing voluntary programs. Mandatory inclusionary zoning provides an additional mechanism for securing affordable and social housing, particularly in well-serviced locations with higher land values. Recent research by the University of Melbourne has found that most industry members are supportive of inclusionary zoning, so long as sufficient forward notice is provided to allow for land prices to respond.

Findings from the [Planning Mechanisms for Affordable Housing Advisory Committee](#) do not appear to be reflected in the consultation paper. There needs to be more work done on identifying localities/sites that are suitable for inclusionary zoning as it is a lever that needs to be applied where it is most effective and viable. Medium to large scale urban renewal sites need to be identified

within metropolitan Melbourne and regional cities as suitable for mixed use/housing development of which a percentage should be nominated to be social housing and a percentage affordable housing. The actual percentages will vary depending on the residual land value and other factors but earmarking these sites is needed initially. Government can then undertake a fast-track rezoning/development approval process for such developments.

Recommendation 16: Reform of residential tenancy laws to include rent capping and security of tenure.

I am 79, Aged Pensioner, with several serious health issues. I am renting an apartment in which I have been living for about 15 years. I am renting from a private Landlord. Recently I have applied and had been recognized as eligible for Aged Care Home Assistance, initial package, just help in meal preparation and cleaning the dwellings. However, two helping ladies who came, found my apartment below acceptable standards for their health, even for just two hours per week attendance (excessive mould all over the place). As a result, the services have been suspended. They clearly indicated that it is because Landlord's breach of duty of proper maintenance. What happened next I would not have believed had not I happened to be a victim of this. Not only the Landlord refused admit any responsibility, she refused authorize two professional mould cleaning company that I contacted to come, make FREE assessment and provide a FREE report about the nature, reason and fixing the problem. Obviously, the Landlord is deliberately using unhealthy conditions as a leverage to force me out of the apartment. (Anthony, in letter to HAAG, July 2019)

Recent improvements in Victorian tenancy laws have some positive aspects (like removing no reason notices) but the laws have not gone far enough to provide secure tenure and affordability. It is also unclear how effective changes to areas such as modifications will be. The fact remains that private rental properties are still fundamentally unpredictable places to live.

The numbers of older people at risk of homelessness in the private rental market is rapidly increasing. The 2016 ABS Census shows that across Australia there has been a 42% increase (since 2011) in people aged 65 and over on the lowest 40% of incomes who are paying unaffordable rents. For those living from pay to pay, a 14-day notice to vacate due to being unable to pay rent is never far away. Life shocks such as the death of a partner, a health crisis incurring unexpected costs, for those of working age, the loss of a job, will trigger almost immediate homelessness. The reality for private renters reliant on welfare payments or pensions is that housing stress is inevitable, and there is a serious risk of falling into rental arrears and homelessness, even without a specific crisis.

Whilst unaffordability is a major problem, a lack of secure tenure and adaptability with ageing are equally prohibitive factors that make private rental housing unsuitable for older people. For many older people, the private rental market is akin to a homelessness waiting list due to its lack of regulation that creates many 'triggers' that can cause eviction in a short period of time. For instance, an older person may have had a fall due to the often unsafe conditions in the cheapest rentals. When being discharged from hospital, it will become evident that their housing is not suitable to prevent future falls and accommodate new walking aids; however, the landlord is often unwilling to make the modifications needed. Although they are legally obliged to allow disability modifications, many homes, especially those on the cheaper end of the market, are poorly designed and unable to be modified. Tenants often also fear a rent increase will follow any modifications or repairs.

We also know that if older people fall out of the private rental market it becomes very difficult for them to re-enter it. It is at this stage where they can enter a cycle of homelessness including staying with family and friends, couch surfing, sleeping in cars, temporary housing or other forms of overcrowding and sleeping rough. Older people using our Home at Last service have reported "lining up around the street" for high demand cheaper properties and feeling like they have "no chance of finding a property" when competing with working singles and couples. People will usually contact our Home at Last service after applying for tens of private rental properties and being rejected over and over again.

Recommendation 17: Regulate community housing providers management standards so that tenancy selection, rent setting, modifications and transfers align with public housing management standards.

While the rights of tenants for both public and community housing are set out under the Residential Tenancies Act 1997 (Vic), community housing providers (CHPs) have separate policies relating to housing allocation and tenancy management. The differences in policy and management have a bearing on the rights of tenants and access to secure, safe and affordable housing for older people on low incomes who are experiencing, or at risk of, housing stress and homelessness. These differences and the different experiences of tenants are described in recent HAAG research, [Public Housing and Community Housing: Comparing the rights and experiences of older tenants in Victoria](#).

Further specific recommendations include:

- Ensure community housing providers' policies, as a condition of registration, include the application of social landlord principles and guidelines with regards to decision making. This includes fair and transparent allocation of housing to applicants on low incomes and with complex health and support needs.
- Ensure income-based rent for community housing tenants on low to moderate incomes does not exceed 30% of total household income and is adjusted according to decreases in household income.
- Ensure community housing providers are subject to the same benchmarks for tenancy management as public housing, including clear and transparent policies that apply to tenancy selection, rent setting, financial hardship, maintenance, and modifications, with evictions as last resort, and that these benchmarks and policies be publicly available.

Recommendation 18: Develop models of shared equity housing for older people.

Shared equity models are a good option for the "missing middle". Opportunity exists to learn from and adapt existing models to meet the needs of older Victorians, such as, the United Kingdom's [Older Persons Shared Ownership model](#).

Recommendation 19: Ensure public, social and affordable housing complies with universal design principles, ensuring access for older people and in recognition that they are also likely to live with a disability. Housing should also meet environmental 7 star rating standards.

*"I need housing without stairs because of limited mobility, and I live in housing with stairs now".
(Home at Last client)*

Lack of accessibility in housing is forcing older people into homelessness. The Victorian Government acknowledges that a lack of accessible features makes housing inappropriate as evidenced by two sections of the Priority Housing application which include the need for major modifications as a reason for requiring social housing urgently: Housing modifications and medical needs.

From our case work, we know that people who are in inaccessible housing can be extremely isolated. Those who are restricted by stairs around their property are often unable to leave their home. While they may be eligible for priority housing, it can take several years before they are offered housing, especially if they require a modified or ground floor property.

When housing becomes dangerous or unusable (for instance if an older person suddenly needs to use a wheelchair and essential spaces such as bathrooms, kitchens and toilets become unusable) the older person is put at immediate risk of becoming homeless. Where someone must leave their housing immediately due to lack of accessibility, there are often very few accessible alternatives and older people will sometimes find themselves with no alternative than to prematurely enter residential aged care.

At a minimum, all new housing should have:

- An accessible path of travel from the street or parking area to the entry level of a dwelling
- Doors, corridors and living spaces that allow ease of access for most people on the entry level
- A bathroom, shower and toilet that can be used by most people with reinforced wall areas for grab-rails at a later date.

In addition, we recommend:

- Education and training for the housing industry on minimum access features
- Retrospectively modify existing public and social housing stock to meet universal design standards.

Older people are particularly vulnerable to the effects of climate change, with heat waves a significant risk for people aged over 75. This is compounded by poverty, which is a barrier to accessing the very few measures available to people in extremely hot conditions – visiting a cinema, local pool or shopping centre is impossible for older people who lack mobility or cannot afford transport. This means that having well-insulated homes with adequate cooling is a life-saving measure for older people in a heat wave. Despite this, there are no minimum standards for insulation or cooling in the new Residential Tenancies Act reforms. For this reason, we support minimum environmental 7-star ratings for all new and existing buildings.

Recommendation 20: Extend the scope of the Royal Commission into Family Violence Recommendation 20 so that the Victorian Government reports annually on the extent of unmet housing demand among people affected by elder abuse, and proposed actions for meeting the continuing housing demand from older people affected by elder abuse.

Our Home at Last service has seen a steady increase in the number of people experiencing elder abuse and family violence, with many of these clients from a CALD background. This is not necessarily because elder abuse is more prevalent in those communities but because our bilingual community education program has built a high profile and trust in those communities. Where there is an expectation that older people live intergenerationally with their families as they age, the stigma around family relationship breakdown is high and a barrier to accessing services. Many of these clients come to our service rather than to family violence or elder abuse services because they would prefer to resolve the housing issue that is causing the elder abuse (living with family members where relationships have broken down) in the hope that will resolve family conflict. Often referrals to family violence, mediation or Seniors Rights Victoria are declined by the client.

Specific reporting on the unmet need for housing for people affected by elder abuse, (often perpetrated by adult children and a result of ageism as well as sexism) would raise awareness of the issue amongst decision makers. Meeting the continued housing demand for older people at risk of homelessness due to elder abuse should be a priority for any investment in social and affordable housing.

Recommendation 21: Rural and regional allocation of Big Housing Build investment and any future investment in housing must include criteria which prioritises housing in areas of the greatest need, noting that some regions and cohorts of high need have missed out.

HAAG supports the Government's commitment to invest 25% of the Big Housing Build budget across regional Victoria. This responds to affordable housing needs in growth areas as well as in regional areas. In line with Strategy principles, we advocate for older people to be at the centre of designing and planning housing responses to ensure their needs are met.

HAAG has secured funding from the Ian Rollo Currie Estate Foundation for a pilot project in regional and rural Victoria. The purpose of this project is to pilot the delivery of the Home at Last service to

support older people at risk of and experiencing homelessness in a region of Victoria. This is an exciting project as it provides us with the opportunity to expand our community engagement and housing support in regional and rural Victoria, while integrating with and being complemented by HAAG's existing state-wide information and referral services.

Our early consultation work has identified that there is a perception that housing is cheaper in rural areas, however, many older people who move to regional areas find themselves socially isolated, in housing stress, reliant on maintaining a vehicle, and with fewer available health and other services.

Many areas of high need due to rising house costs post COVID, natural disasters and rural decline have missed out on minimum investment guarantees.

Some cohorts of older people, particularly Aboriginal and Torres Strait Islanders and people who have experienced homelessness, have prematurely aged and have early onset of age-related illness. They may be falling through the gaps of aged care and NDIS support services and require specialised housing responses.

Focus Area 4: Partnerships

Q How can we engage with you as we develop new initiatives over the course of this strategy?

HAAG strongly supports strengthening partnerships to achieve positive housing outcomes for older people experiencing or at risk of homelessness. The Government should recognise older people's unique housing needs and increase engagement through existing groups like HAAG where participants are already connected and empowered to participate.

Recommendation 22: Improve consultation and engagement with older people at risk of homelessness by working through existing groups like HAAG where participants are already connected and empowered to participate.

HAAG is ready to lead this engagement and support facilitation for other partners to improve knowledge and capacity to respond across the sector. We have a proven track record in engaging with older people from marginalised or disadvantaged communities, and over 30 years of community engagement experience.

HAAG recommends the Government listens to and learns from members of the CALD communities, ethno-specific organisations, Aboriginal and Torres Strait Islanders and Aboriginal-controlled organisations to better tailor housing responses.

Recommendation 23: Ensure smaller, specialised community housing providers are provided opportunities to build new social and affordable housing via the Big Housing Build and do not miss out to the larger providers.

Older people require a range of affordable, secure housing options so that they have choice about where they live as they age. Our consultations with older LGBTI people and older people living in retirement housing confirm the need for small, flexible housing options and a specialised response. We are concerned that small providers, such as housing co-operatives, may miss out in a competitive tendering process that favours several larger community housing providers who have the resources to commit to the application, including the capacity to hire expensive architects and lawyers. For housing to be co-designed, flexible and provide choice there needs to be a range of housing providers both large and small who are able to develop appropriate housing options.

For more information see our website www.oldertenants.org.au

ⁱ HAAG and Social Ventures Australia, 2020, Policy Snapshot - At Risk:405,000 older women at risk of homelessness without urgent policy reform

https://www.older tenants.org.au/sites/default/files/at_risk_policy_snapshot_and_key_findings_web.pdf

ⁱⁱ McNelis, S. 2004, Independent Living Units: The forgotten social housing sector, AHURI.

ⁱⁱⁱ Bessant, L. 2018, Out of the Frying Pan, Into the Fire: The experiences of Housing for the Aged Action Group clients referred to Independent Living Units and general retirement information, HAAG, p.25.

^{iv} Victorian Government Judy Yates, 2017, found at

https://www.parliament.vic.gov.au/images/stories/committees/SCLSI/Public_Housing_Renewal_Program/QON/VPTA-QON-Victorias_social_housing_supply_reqs_to_2036.pdf

^v Victoria's Auditor General, 2017, Managing Victoria's public housing , found at

<https://www.audit.vic.gov.au/sites/default/files/20170621-Public-Housing.pdf> 8/01/2020

^{vi} Victoria's Auditor General, 2017, Managing Victoria's public housing , found at

<https://www.audit.vic.gov.au/sites/default/files/20170621-Public-Housing.pdf> 8/01/2020