



National Strategy to Achieve Gender Equality

For further information

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Introduction

Housing for the Aged Action Group (HAAG) is the only Australian organisation of its kind specialising in the housing needs of older people. The organisation has over 700 members across the country actively campaigning for housing justice. Established nearly 40 years ago as a grassroots movement, the organisation has developed a robust service delivery arm in Victoria and has a strong presence in advocacy for older people experiencing housing and homelessness related issues across the country. During the 2021-22 financial year, HAAG supported close to 1,000 older people, and assisted about 120 older people into long term, affordable housing.¹

In 2016, HAAG was funded by the Wicking Trust (a philanthropic organisation) to conduct research in every state and territory to understand the depth and breadth of housing and homelessness issues of older people. In consultation and engagement with services, people with lived experience, advocates and peak advocacy bodies across Australia, the research project produced a number of reports on the housing issues of older people.² HAAG was funded for a further four years to continue the advocacy in 2020.

HAAG welcomes the opportunity to provide input into the National Strategy to Achieve Gender Equality (the Strategy). This submission is based on our experience delivering housing and related support services to older women, research and lived experiences of older women experiencing housing stress or homelessness in Australia. We especially acknowledge the contributions to this submission made by members of HAAG's advisory groups including National Alliance for Seniors Housing (NASH), Retirement Accommodation Action Group (RAAG), LGBTQIA+ reference group, culturally and linguistically diverse (CALD) reference group and NSW Lived Experience Advocacy Group (LEAG).

The Strategy should be inclusive of all women and their diversity. HAAG strongly supports this strategy adopting a clear process to meaningfully address intersectional aspects of a woman's life that can impact on their life trajectory, especially the challenges experienced by older women from Aboriginal and Torres Strait Islander backgrounds, culturally and linguistically diverse backgrounds, older women with disability, LBTQIA+ older people and those living in rural, remote and regional areas. In addition to consultation with the funded peak advocacy bodies, there should be ongoing meaningful consultation with older women in the initial stages of the development as well as embedded processes to ensure they are involved in design, development and implementation of the Strategy.

We also acknowledge that housing issues disproportionately affect Aboriginal and Torres Strait Islander older women due to dispossession, discrimination, racism and policy failures. We strongly encourage the Strategy process to engage directly with Aboriginal and Torres Strait Islander older women, Elders and their representative organisations and adopt all relevant recommendations made by them as they are the experts on issues that affect them and their communities.

As an organisation that embraces diversity, we would like to highlight at the outset that references to older women in this submission refer to all women; including cisgender women, transgender women, those who are non-binary, gender diverse or intersex and experience various challenges with economic participation, housing and health outcomes due to their gender identity.

¹ Housing for the Aged Action Group, Annual Report 2021-2022, accessible at: https://www.oldertenants.org.au/sites/default/files/annual_report_2021-22.pdf

² See further: Housing for the Aged Action Group, Ageing on the Edge National Action Project, accessible at: <https://www.oldertenants.org.au/ageing-edge-national-action-project>

Recommendations

- Ensure ongoing consultation with older women, especially those with lived experience of homelessness or being at risk of homelessness and severe poverty, from diverse backgrounds, geographic areas and household settings to better understand their needs.
- Embed voices of older women throughout the life span of the Strategy and mechanisms to ensure they are involved in design, development and implementation of the Strategy.

Housing and Homelessness

- Fund the construction of 25,000 public, community and affordable homes per year across the country as a matter of priority, including specific increased allocations of homes for older women.
- Commit to a target to increase the net stock of social and affordable housing to 10% of all residential dwellings by 2050 in partnership with State and Territory governments.
- Fund the delivery of specialist housing information and support services for older people with a special focus on older women based HAAG's Home at Last service model, in every State and Territory.
- Strengthen rental protections and harmonise State and Territory legislation to ensure equitable rental protections across the country.
- Address specific barriers women with disability, including older women experience including access to affordable, safe and accessible, housing that adhere to universal housing design principles.
- Identify solutions for the older women who are considered the 'missing middle' including investment in Independent Living Units with proportion of them ringfenced for older women.

Addressing economic disadvantage

- Raise income support payments like JobSeeker and index all working-age payments twice per year in line with Consumer Price Index (CPI) and wages to lift women off poverty line.
- Develop a national agenda to recognise and rectify the historic superannuation gap that lead to older women experiencing poverty in retirement.

Health and wellbeing

- Address the inherent discrimination in health settings including health costs and increasing targeted health services to older women to ensure they access health services before a health crisis.
- Provide ongoing training to medical professionals in various health settings to better understand the needs of older women, particularly gender diverse older people without prejudice or discrimination.

Elder abuse and domestic and family violence

- Focus on elder abuse and related implications on older women as a separate area of focus with references to recommendations from other parallel frameworks such as The Royal Commission into Aged Care Quality and Safety.

Context

The Strategy provides a timely opportunity to meaningfully address disadvantages experienced by women of all ages. Many generalist policies that are currently being developed as a result of these consultation processes are less likely to benefit older women unless there is a specific focus on older women and/or have a retrospective effect, especially in areas such as addressing superannuation gaps.

Multiple structural and systemic issues, as well as changes to personal circumstances, can increase an older women's risk of homelessness and experiencing severe poverty. In addition to rising housing costs, eviction, job loss, financial instability, domestic violence or elder abuse, the end of a relationship, sudden illness and disability or a combination of these factors can result in older women experiencing homelessness later in life. These challenges are exacerbated for older women who have been in the largely feminised and low paid care sectors, taking time off work for care responsibilities and have limited superannuation. Although some of these factors are discussed separately in this submission, it is important to note that they are intersectional, and many older women experience multiple challenges at any given time.

Housing and homelessness

Safe, long-term and affordable housing provides a basic foundation in a person's life and for older women housing is becoming increasingly unaffordable.

"Housing is the key to everything. Without secure, equitable housing, everything else is inaccessible."

Member of HAAG's LGBTQIA+ Reference Group

As established by research, the assumption built into the Australian retirement housing system is that on retirement, people will own their own home. Increasingly, this is not the case, and for older single women it is much less likely. Older women who live alone were found to be nine times more likely to be at risk of homelessness.³ This is concerning given that the Australian Bureau of Statistics projects the percentage of women living alone will gradually increase to 57% by 2041.⁴

The *Poverty in Australia 2023: Who is Affected* report analysed poverty among different age groups and found that poverty was much higher among the older people who rent their homes, due to their much higher housing costs.⁵

It is encouraging that the discussion paper recognises that older women are the fastest growing cohort experiencing homelessness. Research found that 405,000 women over 45 years were at risk

³ Housing for the Aged Action Group, *At Risk: Understanding the population size and demographics of older women at risk of homelessness in Australia*, 2020 accessible at:

https://www.olderrenters.org.au/sites/default/files/at_risk_final_report_web.pdf

⁴ Australian Bureau of Statistics, *Household and Family Projections*, Australia, 2019, accessible at:

<https://www.abs.gov.au/statistics/people/population/household-and-family-projections-australia/latest-release>

⁵ P. Davidson, B. Bradbury, and M. Wong, *Poverty in Australia 2023: Who is affected Poverty and Inequality Partnership*, 2023, accessible at: https://povertyandinequality.acoss.org.au/wp-content/uploads/2023/03/Poverty-in-Australia-2023_Who-is-affected_screen.pdf

of homelessness.⁶ The recent data from census indicated that women had the largest proportional increase in homelessness compared to 2016 (1.6% males compared to 10.1%).⁷ Older women are less likely to identify as they are experiencing homelessness, not disclose their housing situation due to shame and stigma, it is possible that the census data on homelessness among older women is an undercount.

Many older single women in the current rental market are likely to be at significant risk of homelessness due to rising cost of living and the current rental crisis. This can have a significant impact on their mental and physical health.

“Over 55 people are seeking low-cost accommodation. We are not seeking luxury we are seeking accommodation on limited income. They are doing this while dealing with the mental stress and discrimination involved in day-to-day life, let alone when under housing stress.”

Member of HAAG’s LGBTQIA+ Reference Group

Many older women experiencing homelessness have not experienced homelessness before and have had ‘conventional’ housing histories throughout their life. This means they often do not identify that they are experiencing homelessness or know where to turn for help. Some older women express that their situation is ‘not as bad as others’ and that they can ‘manage’ as they always have, even though they are experiencing homelessness.

“Older women have always been the ones to put on a brave face and make-do with what they have. They’d always say that everything’s fine when they are barely keeping their head above water to pay rent and other bills.”

Member of HAAG’s National Alliance for Seniors Housing

Case study

Mel* an older woman in her early 60s continued to live with her ex-husband until she was able to find an affordable place close to her daughter and grandchildren. After inspecting multiple properties in Western Sydney, she realised she was unable to compete in the private rental market with people who are employed or couples with higher incomes.

The only affordable option she could find was an unregistered boarding house advertised through Gumtree. She had a bedroom to herself with a shared bathroom and kitchen. Mel was happy that she didn’t have to share the room unlike other places she inspected, which she assumed was student accommodation that is highly inappropriate for any person, let alone older women in housing crisis.

She stated *“I don’t have a way to lock the door to my room and I know the lady (her landlord) comes into my room and goes through my stuff when I’m not home. But that’s fine... I have a place to live.”*

⁶ Housing for the Aged Action Group, At Risk: Understanding the population size and demographics of older women at risk of homelessness in Australia, 2020, accessible at:

https://www.olderrenters.org.au/sites/default/files/at_risk_final_report_web.pdf

⁷ Australian Bureau of Statistics, Estimating Homelessness, 2023, accessible at:

<https://www.abs.gov.au/statistics/people/housing/estimating-homelessness-census/2021>

When asked whether she has contacted community services for support, she said, *“I know others are in much worse situations than me and I don’t want to clog the system.”*

Mel has not applied for social housing in NSW after she was told by the housing department that there is a 10 year waiting period for a property to be offered to her.

**Name has been changed and the person’s consent was obtained to share the story*

Attitudes such as these where older women feel that younger people, families and those complex challenges are more deserving of housing prevents them from seeking assistance from government services and others. For these reasons, this cohort of older women at risk of homelessness is often described as ‘invisible’.

The *Older Women in the Private Rental Sector: Unaffordable, Substandard and Insecure Housing* report has a detailed discussion on extreme levels of poverty older women experience and the lengths they go to cover their essential expenses.⁸ For many participants rental affordability was further compounded by competition. This included competition from other renters on higher incomes as well as from the holiday rentals market.

Often gender and age discrimination in the housing market further exacerbate the housing challenges older people experience. This is particularly the case for gender diverse older people.

“It (discrimination) comes out in all different ways, landlords demand renters send so many documents, character references and pictures so older transgender and LGBTQIA+ people experience discrimination.

Some parts of the real estate industry are not regulated and are creating situations that are discriminatory ... If you are experiencing and have experienced lifelong discrimination, then you won’t be picked as a tenant.”

Member of HAAG’s LGBTQIA+ Reference Group

Access to housing close to amenities such as hospitals, community services and public transport is critical for many older women, particularly as they age and the need to access health services are likely to increase over time. However, the rental crisis has created too much competition for housing and housing close to these public amenities are unaffordable for many including older women.

“Those of us who have pre-existing medical conditions have out of pocket costs that puts us in a financially difficult position, some of us need to live near hospitals and medical services yet these places are regarded as premium rental spaces ...

Some of us can’t afford to have a car or afford the upkeep of one, so we are limited to live closer to transport systems.”

Member of HAAG’s LGBTQIA+ Reference Group

A Productivity Commission report found that current levels of awareness and knowledge regarding aged care and housing options are low among older people and that more effective provision of

⁸ E. Power, *Older Women in the Private Rental Sector: Unaffordable, Substandard and Insecure Housing*, 2020, accessible at: <https://doi.org/10.26183/5edf0f0d75cf8>

information is needed to support better housing decisions.⁹ Other research has found that most older people experiencing or at risk of homelessness do not know where to go for assistance. Service providers are also often unsure about how to assist older women experiencing or at risk of homelessness.

The Productivity Commission report *In need of repair: The National Housing and Homelessness Agreement* identified that homelessness services targeted towards older people are necessary to encourage more older people to seek support.¹⁰ Thus, there needs to be better targeting of supports, especially early intervention and prevention supports as well as raising awareness about different experiences of homelessness among these older women.

Home at Last Service

The HAAG Home at Last service model in Victoria demonstrates that better housing outcomes can be achieved for older people experiencing financial disadvantages. Home at Last provides accessible, equitable and appropriate support and housing information for older people who are experiencing homelessness or at risk of homelessness. Services range from providing tailored housing information to assistance with housing applications, support during the move, establishing a new home and referrals into aged care and other supports.

An Ernst & Young Cost Benefit Analysis (CBA) (see Table 1 below) found that the Home at Last service has a benefit cost ratio of 2.3.¹¹ This means that every dollar spent on the Home at Last housing information and support service generates at least \$2.30 in societal value.

This model was supported by the findings of the Productivity Commission that stated, 'one promising model to address older people's homelessness is the 'Home at Last' program, which the Housing for the Aged Action Group delivers in Victoria'.¹²

Case Study

Paula*, 78 years and her husband were living in private rental. They had about \$20,000 in savings that they were using to pay rent as their combined Age Pension was insufficient. Paula's husband required disability modifications following a fall that required hospitalisation. He could not access the shower or manage the steps. Even though they had funding for the rails through his age care package, the landlord refused the modifications. The couple were fearful to raise the issue with the landlord due to fear of being evicted.

When Paula's husband passed away, Paula was left having to pay the rent alone and she had used their savings to pay for her husband's funeral. Unable to afford the rent, Paula moved in with her

⁹ Productivity Commission, *Housing decisions of Older Australians*, 2015, accessible at: <https://www.pc.gov.au/research/completed/housing-decisions-older-australians>

¹⁰ Productivity Commission, *Housing decisions of Older Australians*, 2015, accessible at: <https://www.pc.gov.au/research/completed/housing-decisions-older-australians>

¹¹ Housing for the Aged Action Group, 2021, *Home at Last Economic Appraisal*, Ernst & Young accessible at: https://www.olderrentals.org.au/sites/default/files/home_at_last_economic_appraisal_-_final_report_-_november_2021.pdf

¹² Productivity Commission, *In need of repair: The National Housing and Homelessness Agreement*, 2022, accessible at: <https://www.pc.gov.au/inquiries/completed/housing-homelessness/report/housing-homelessness.pdf>

daughter. She had to sleep on the couch and share a bathroom with seven other people in the already overcrowded home of her daughter. She was facing homelessness, grieving for her husband and her own health was failing.

Paula's daughter called the Home at Last Service, and Paula was assisted to apply for housing. After six months, she received a housing offer in a new community housing one-bedroom unit close to her doctor and with public transport that allowed her to visit her family. Her health has improved, and she remains close to her daughter and grandchildren.

**Name has been changed and the person's consent was obtained to share the story*

Nationally consistent rental protections

For older women renting on a low income, the connection between housing insecurity and broader feelings of personal insecurity are especially acute.¹³ Many older women at risk of or experiencing homelessness manage by living in unaffordable, substandard and insecure private rentals or seeking support from family and friends in what they hope to be a temporary arrangement whilst they are 'between homes'.¹⁴

There has been little or no progress to ensure meaningful protections for renters in various states and territories. Strengthening rental protections will increase the security of tenure for many renters, especially older women on low incomes. For example, different states have varying levels of legislative protections in relation to 'no grounds evictions', home modifications for people with disability, protections for renters experiencing family violence, minimum standards, and protections for renters living in caravan parks. There is a clear need to strengthen rental protections as well as harmonise State and Territory legislation to ensure equitable rental protections across the country.

Accessible housing

With limited housing options that are accessible and affordable across the country for people with disability and older women, there is stiff competition for the small number of houses that are accessible, close to amenities and are affordable. In 2021-22, approximately 50% of HAAG's clients had mobility issues that impact on their housing needs.¹⁵

Case Study

Farida* is a 72 year old Arabic-speaking woman who has complex health needs, including needing a wheelchair and assistance with most activities of daily living. Farida was living with her adult son. She had purchased a home for him using her life savings, with the understanding that he would care for her as she aged. However, her son completely neglected her. She had been confined to bed as he had cancelled all her external care supports. He also did not allow her to

¹³ E. Power, Older women in the private rental sector: unaffordable, substandard and insecure housing, Western Sydney University, 2018, accessible at: <https://doi.org/10.26183/5edf0f0d75cf8>

¹⁴ D. Faulkner and J Fielder, The older I get the scarier it becomes: Older people at risk of homelessness in NSW, 2017, accessible at: <https://www.olderrentants.org.au/sites/default/files/older-i-get-scarier-it-becomes-291117.pdf>

¹⁵ Housing for the Aged Action Group, Annual Report 2021-2022, accessible at: https://www.olderrentants.org.au/sites/default/files/annual_report_2021-22.pdf

seek medical treatment, controlled all her finances and communication with the outside world. She said she felt like “a prisoner”.

Farida was connected to support services through a friend, and after many challenges due to language and physical barriers, elder abuse and her fearfulness of her son, Farida was able to access respite care while a more permanent housing option was found. Unfortunately, most housing options were not physically accessible and did not allow modifications for her mobility needs.

After advocacy from her case workers, Farida moved from respite care into a fully accessible modified and accessible unit in a suburb that had Arabic-speaking communities, in language services and was close to her medical services. Farida now lives independently, with a home care package in place, and her health has significantly improved.

**Name has been changed and the person’s consent was obtained to share the story*

Although mandatory minimum accessibility standards have been included in the National Construction Code, not all states and territories have agreed to implement them. A lack of accessibility in housing, and a lack of funds to modify homes to make them more accessible means that mobility issues can push older women into homelessness.

Social and affordable housing supply gap

There is a growing gap of social housing yield and demand. According to National Housing Financial and Investment Corporation (NHFIC), over the period 2016 to 2036, some 727,300 additional social dwellings would be needed, implying an annual average growth of 5.5% over the existing stock. To simply prevent further deterioration in the current shortfall of social housing, 290,000 homes are required over the projection period, or 15,000 annually.¹⁶ Given the current rental crisis and Australia’s growing ageing population, it is imperative that the Federal government works with State and Territory governments to ensure that the annual growth rate of social housing is progressively increased to at least 10% of all residential dwellings by 2050.

None of the existing Federal, State and Territory government commitments are nearly enough to or come close to increasing the housing stock at the rate that is required to prevent older women from experiencing homelessness. The largest financial contribution of the Federal government is the CRA and while this is essential, CRA does not contribute towards increasing housing stock. Although the Government announcement of building 20,000 social homes, with 4,000 of them ringfenced for older women and children and families experiencing domestic and family violence are welcome, that is woefully inadequate to address the demand for social and affordable housing.

There are models such as co-housing and shared equity models that are proposed as solutions for resolving the housing issues of older women. These are appropriate in some cases where the regulations and supports are in place for older women and they are making informed decisions. However, most older women with modest savings are unlikely to benefit from shared equity models

¹⁶ National Housing Financial and Investment Corporation, State of the Nation’s Housing 2021–22, 2022, accessible at: <https://www.nhfic.gov.au/media/1814/nhfic-state-of-the-nations-housing-2021-22-full-final.pdf>

even if there are government guarantees as there are challenges with obtaining bank loans, cost of properties and current and future earning capacity.

With a growing housing crisis that is disproportionately affecting older women, there is a clear need to invest in housing options that meet their specific needs. The Federal government in collaboration with State and Territory governments should fund the construction of social and affordable housing as a matter of priority. Given the current shortage and the future demand (as identified by NHFIC research), the government should fund the construction of 25,000 social and affordable homes per year as a matter of priority.

Identify solutions for the ‘missing middle’ including investment in Independent Living Units for older people.

Eligibility for social housing is determined by a range of factors including savings and assets. 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 referred to as the ‘missing middle’.¹⁷

The missing middle is a growing cohort of older people, largely older women who do not own their own home but have savings or assets above the social housing asset limit (for example in Victoria the limit is \$34,656 and \$14,028 for priority housing and \$35,000 per household in Tasmania). These are older women who are not wealthy enough to buy their own home or fund a place in a retirement village, however, are also not eligible for social housing due to their level of savings. This leaves them with radically fewer options and most housing and homelessness services simply will not assist them.

One of the solutions that may be appropriate for this cohort are Independent Living Units (ILU). ILUs generally are 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.¹⁸ ILUs offer a high level of security of tenure, affordable rent, and require either low, means-tested, or no ongoing contributions. For some older people who are part of the missing middle, ILUs can be the only option that meets the long-term needs.

As the ILU sector has not been adequately funded since the mid-1980s the stock is in decline. Early findings from HAAG’s research suggests that around 50% of Victoria’s ILUs are no longer available. Anecdotally HAAG understand that many ILUs have closed or sold off, 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.

Economic disadvantage

It is well established that women are experiencing economic hardship into retirement due to systemic and policy failures of the past few decades. The past governments’ failure to address these gaps in policies and law has led to disproportionate disadvantages on older women including lost

¹⁷ Housing for the Aged Action Group, The ‘missing middle’: Older people falling through the cracks in the housing and homelessness system, 2021, accessible at:

https://www.olderrenters.org.au/sites/default/files/missing_middle_briefing_note_feb2021.pdf

¹⁸ Housing for the Aged Action Group, Establishing a 10-Year Strategy for Social and Affordable Housing Discussion Paper, 2021, accessible at:

https://www.olderrenters.org.au/sites/default/files/haag_submission_to_10_year_housing_strategy_final.pdf

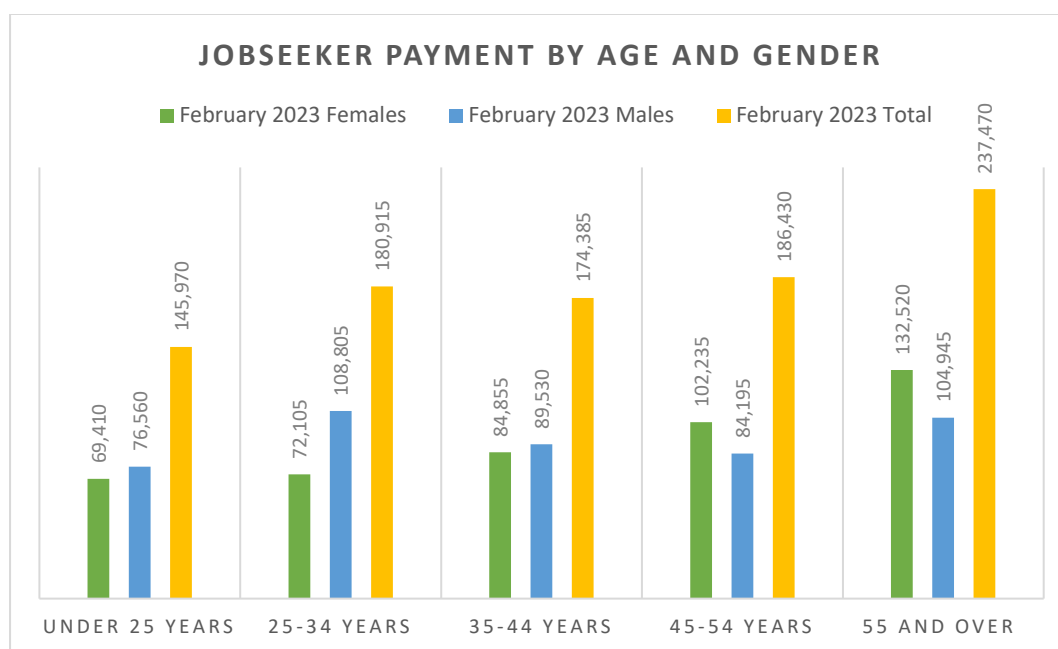
wages, reduced opportunities for career advancement, and lower retirement savings, ultimately increasing the risk of poverty in old age. Numerous reports such as Respect at Work and Willing to Work highlighted the challenges women experience. Despite these, there has been little progress made to addressing the gender pay gap and inherent biases in workplaces that favours men.

“When I quit my job, the man they hired right after me was on a higher wage.”

Member of HAAG’s Retirement Accommodation Action Group

Inadequacy of income support payments

It is well established that income support payment rates are significantly inadequate to meet the housing and other costs. Currently, a single person on JobSeeker with no children will receive \$693.10 per fortnight.¹⁹ Those aged 55-64 years make up the largest cohort receiving Jobseeker payment with close to 238,000 people over 55 years receiving the payment in February 2023. Of the 238,000 people 132,500 were older women, a higher proportion than older men.²⁰ The data set of Department of Social Services only breakdown income support recipients by male and female. Therefore, it is unclear how many recipients are non-binary and/or gender diverse.



Source: Department of Social Services, DSS JobSeeker Payment and Youth Allowance recipients – monthly profile February 2023

Even with Commonwealth Rent Assistance (CRA) and other supplements, older women in receipt of Jobseeker payment are likely in significant rental stress. The Strategy should acknowledge the disproportionately high number of older women receiving Jobseeker payment, who are likely

¹⁹ Services Australia, A guide to Australian Government payments 20 March 2023 to 30 June 2023, accessible at: <https://www.servicessa.gov.au/sites/default/files/2023-03/co029-2303.pdf>

²⁰ Department of Social Services, DSS JobSeeker Payment and Youth Allowance recipients – monthly profile February 2023, accessible at: <https://www.data.gov.au/data/dataset/jobseeker-payment-and-youth-allowance-recipients-monthly-profile>

experiencing or at high risk of homelessness due to severe financial pressure. Considering the increasing cost of living and the current rental crisis, HAAG supports the recommendations made by ACOSS and call the government to –

- Raise income support payments like JobSeeker and index all working-age payments twice per year in line with Consumer Price Index (CPI) and wages.
- Improve the adequacy of payment supplements to meet additional living costs, including by lifting the maximum threshold for Commonwealth Rent Assistance (CRA) by 50%.

Superannuation gap and long-term financial impact on women

The significant gap in wealth and asset accumulation between men and women as well as caring responsibilities, employment and superannuation is a gendered problem that needs to be addressed as a legacy issue. With significantly less superannuation than men and a greater reliance on a generally inadequate age pension, women are more likely to face financial insecurity and poverty in retirement than men. This is particularly the case for single older women.²¹

A research study conducted by the Australian Human Rights Commission and the Workplace Gender Equality Agency found that women aged 55-64 have on average only 58% of the retirement savings of men in the same age group. This gap is largely due to a lifetime of lower earnings, career breaks for caring responsibilities, and the gender pay gap. The study also found that the gender pay gap and the gender superannuation gap interact to create a compounding effect, with women experiencing greater disadvantage in retirement.²²

As identified in the discussion paper, many older women who cared for children and other family members are substantially fiscally disadvantaged due to policy failures. Many women who were in workforce were unable to access superannuation until early 1990s.

“I can remember being told by a man interviewing me for a job, ‘why do you need super? Your husband will take care of you’.”

Member of HAAG’s Retirement Accommodation Action Group

Many older women feel that the government policies have failed them in retirement and are unlikely to reap the benefits unless they are specifically designed to benefit older women.

“The work and burdens of the carers and the bearers are not being recognised. The saying about children at the time was, one for mum, one for dad and one for the country – and now those women are suffering the consequences in their retirement.”

Member of HAAG’s Retirement Accommodation Action Group

²¹ K. Riach, C. O’Hare, B. Dalton and C. Wang, The Future Face of Poverty is Female Stories Behind Australian Women’s Superannuation Poverty in Retirement, 2022, accessible at: <https://www.australiansuper.com/-/media/australian-super/files/campaigns/future-women/the-future-face-of-poverty-is-female.pdf>

²² Australian Human Rights Commission and Workplace Gender Equality Agency. (2019). Women’s financial security in retirement, accessible at: <https://www.humanrights.gov.au/sites/default/files/document/publication/Womens-financial-security-in-retirement-A-snapshot-2019.pdf>

Case study

Sophia*, a 60 years old woman worked as a school administrator for 15 years before being made redundant at the age of 59. She had always rented, never having quite saved enough to buy a house. She had some savings and a small amount of superannuation. Over a period of 18 months, her landlord increased the rent three times, until she depleted all her savings and was paying 90% of her Jobseeker allowance on rent.

Sophia decided to move to a regional center for cheaper rent, but as an older woman she couldn't find work, the car was expensive to run and the house was run down. To save money she avoided turning on the gas heating and couldn't afford the internet or credit on her mobile phone.

She fell behind in rent and was served an eviction notice. With no idea where to turn, she searched the yellow pages and finds a local homelessness service. She learnt she could only access emergency relief food packages and was not eligible for private rental assistance.

**Name has been changed and consent was obtained to share the story*

The current superannuation system favours higher income earners who work full time and continuously throughout their working lives. Women are more likely to have interrupted or fragmented working lives and to work part time because of primary caring responsibilities. Women are also more likely to work in lower paying fields and in lower paying jobs. These factors result in women earning less over their lives than men and therefore accumulating less superannuation savings.²³

The *A Husband is not a Retirement Plan: Achieving Economic Security for Women in Retirement* report prepared as a result of the inquiry makes numerous recommendations that address the structural causes of gender inequality in Australian retirement incomes.²⁴ Recommendations include paying the Superannuation Guarantee (SG) on the Commonwealth Paid Parental Leave Scheme. In addition to distribution of superannuation at divorce or end of a de facto relationship, HAAG supports similar measures to ensure women who take time off for care of children or other family members are not in a financially worse off position.

At retirement, a third of women are not in a relationship. In the immediate years following divorce, women generally experience a decrease in income (while men's income remains similar) and about 60% of women experience financial hardship in the first year of divorce.²⁵ An older woman's financial wellbeing or economic independence should not be dependent on their relationship status.

According to Australian Securities and Investments Commission (ASIC), women aged 65 and over represented the highest proportion of individuals accessing their superannuation early for living

²³ K. Riach, C. O'Hare, B. Dalton and C. Wang, *The Future Face of Poverty is Female Stories Behind Australian Women's Superannuation Poverty in Retirement*, 2022, accessible at: <https://www.australiansuper.com/-/media/australian-super/files/campaigns/future-women/the-future-face-of-poverty-is-female.pdf>

²⁴ Senate Economic References Committee, *A Husband is not a Retirement Plan': Achieving Economic Security for Women in Retirement*, 2016, Commonwealth of Australia, accessible at: https://www.apf.gov.au/Parliamentary_Business/Committees/Senate/Economics/Economic_security_for_women_in_retirement/Report

²⁵ J. Fiedler and D. Faulkner, *The older I get the scarier it becomes: Older people at risk of homelessness in New South Wales*, 2017, accessible at: <https://www.older tenants.org.au/sites/default/files/older-i-get-scarier-it-becomes291117.pdf>

expenses, accounting for 31% of all early withdrawals.²⁶ The ASIC report also noted that the COVID-19 pandemic may have contributed to an increase in the number of individuals accessing their superannuation early for living expenses, with 42% of early withdrawals attributed to pandemic-related financial hardship.²⁷ However, the trend of older women accessing their superannuation for living costs predates the pandemic and is a long-standing issue in Australia's superannuation system.

Therefore, addressing the superannuation gap to benefit older women in Australia requires a multifaceted approach this includes developing national agenda for older women to improve economic, social, housing, health and civic participation outcomes.

Health and wellbeing

Safe and secure housing is a key part of women's health and wellbeing with implications for both mental and physical health. However, due to risk of or experiencing homelessness older women experience poorer health outcomes and premature ageing. Further, as a result of limitations with obtaining adequate home care plans under aged care or disability service systems that meet the support needs, older women can prematurely enter residential aged care.

"The system is not set up to deal with women who are homeless or in (housing) crisis. You can't receive aged care packages if you don't have a home."

Member of HAAG's National Alliance for Seniors Housing

"Expanding home care options help people to stay in home for longer. Provision of basic home help and gardening help can contribute immensely because then you don't have to pay privately for those."

Member of HAAG's Retirement Accommodation Advisory Group

Disproportionately high health costs borne by women

Research indicates that older women in Australia often face higher healthcare costs than men in the same age group. According to research conducted by the Australian Institute of Health and Welfare (AIHW), women in Australia often face higher out-of-pocket healthcare costs than men, even for similar procedures. The research found that, on average, women pay \$205 more in out-of-pocket costs for hospital admissions than men, and \$72 more for non-hospital Medicare services.²⁸

Another research by AIHW found that women aged 55-64 paid an average of \$2,087 per year for healthcare, compared to \$1,510 for men in the same age group. For those aged 65 and over, women paid an average of \$3,021 per year, compared to \$2,096 for men.²⁹

²⁶ Australian Securities and Investments Commission (ASIC), Report 680: Early release of superannuation benefits, 2021, accessible at: <https://download.asic.gov.au/media/5976727/rep-680-published-22-september-2020.pdf>

²⁷ Ibid

²⁸ Australian Institute of Health and Welfare. (2021). Women's out-of-pocket healthcare costs higher than men's. Retrieved from <https://www.aihw.gov.au/news-media/media-releases/2021/august/womens-out-of-pocket-healthcare-costs-higher-than-mens>

²⁹ Australian Institute of Health and Welfare. (2018). Health-care expenditure on chronic disease among older Australians. Retrieved from <https://www.aihw.gov.au/reports/older-people/health-care-expenditure-chronic-disease-older-aust/contents/summary>

The report also found that women's higher healthcare costs can have significant financial implications, with women who experience multiple health conditions or who are on low incomes being particularly vulnerable to the financial impact of healthcare costs.

Furthermore, older women were less likely to have private health insurance compared to older men and were more likely to experience out-of-pocket healthcare costs. This can lead to delayed or reduced healthcare access, which may result in poorer health outcomes for older women.³⁰ Older women who are living in poverty are more likely to experience poor health outcomes, including chronic health conditions, mental health issues, and disability.³¹

Case study

Bee* is an older woman from a migrant background. Her marriage broke down after her children moved out of her home. At the time, she was undergoing treatment for cancer. She approached a number of services including Centrelink to find housing support.

"My first experience with NSW Housing Pathways was traumatic. I was going through cancer then. It's just way too difficult to fill in the form. You need a degree. When you approach them, they treat you like you're the worst dirt on the floor. You go there for help, but they don't help you. You're just like a number.

They told me 16 years waiting (waiting list for social housing). What am I going to do? I don't have a job. I've got no money. No one's going to rent me a place because I've got no income. I looked at places where people make a lot out of your vulnerability. I went to have a look at a room a guy had. Six bunk beds and nothing to put your things – for \$185. I looked at that and said that I can be raped there... my security is very important to me."

Bee was sleeping in her car and during this time was not able to get treatment for her cancer. She parked her car in a hospital car park where she felt safe and a nurse working at the hospital saw her and connected her with a social worker. Bee was supported to access priority housing and has been living in her community housing property for the past 5 years during which time, she was able to access treatment for her cancer.

**Name has been changed and consent was obtained to share the story*

There is a clear need to address the inherent discrimination in health settings including health costs and increasing targeted health services to older women to ensure they access health services before they get to a crisis point.

Lack of or limited availability of trained health professionals

Many older women feel that their concerns are minimised or ignored by health professionals who are dismissive of their health concerns.

³⁰ National Older Women's Network Australia, Poverty and Homelessness Amongst Older Women, 2020, accessible at: <https://nowanet.org.au/wp-content/uploads/2020/06/NOIWAN-Policy-Brief-3-Poverty-and-Homelessness-Amongst-Older-Women.pdf>

³¹ Ibid

“When I went to see a GP sometime ago about my health, he (GP) insisted it was because of menopause. When I asked if I can get some tests done, he said give it time and you’ll be fine. A friend told me to go and get a second opinion and they ran a whole lot of tests and found the issue and I’m now getting the right treatment. Imagine if I listened to the first doctor and waited it out.”

Member of HAAG’s National Alliance for Seniors Housing

In addition to the physical and mental health implications of misdiagnosis or dismissal of older women’s health concerns may also have implications for financial wellbeing.

“The GP’s failure to recognise women’s health issues mean that older women get placed on Jobseeker with mutual obligations, rather than on the Disability Support Pension. The income on Jobseeker is much lower compared to DSP even though women are paying for their disability related expenses. On top of that, Centrelink compliance through mutual obligations can make the health and mental health issues worse.”

Member of HAAG’s National Alliance for Seniors Housing

“In addition to the costs, ageism and gender inequity that compounds for older women - training for women’s health, and for older women’s health in medical school is likely lacking.”

Member of HAAG’s Retirement Accommodation Advocacy Group

There are issues that are specific to gender diverse older people due to limited or lack of understanding among health and other professionals. These experiences result in people becoming reluctant to engage with health and related services.

“I co-identify as a trans intersex female. The health care system constantly misgenders me. There is a lack of understanding about intersex people and assumptions made based on people’s appearances causing misgendering and discrimination again. Medical system is very hard for me to navigate; ongoing consultations and operations means I have to keep engaging with an inequitable health care system.”

Member of HAAG’s LGBTQIA+ Reference Group

“Finding health services that are attentive and understanding to older LGBTQIA+ bodies. Doctors that don’t make you feel like you are abnormal, and people who make you feel comfortable to come out. How did I feel? I trusted this doctor to look after my family and me, and all of a sudden when I told my doctor about my sexuality I was ‘exhibit A’.”

Member of HAAG’s LGBTQIA+ Reference Group

Health services are often the first point of contact for many older women who are likely to be at risk of homelessness. Negative interactions with the health systems or any other support services can result in older women not willing to engage with services or share their issues. Therefore, it is critical that health service staff are provided with ongoing training around gender and cultural sensitivity, especially to those working with older women.

Elder abuse and domestic and family violence

Domestic and family violence continue to be a leading cause of homelessness among women in Australia. There is a clear need to invest in services and supports that address this issue. However,

according to HAAG's service experience, many older women experience homelessness due to other reasons such as financial distress, relationship breakdown, retiring into poverty and age discrimination in private rental and employment markets.

In terms of elder abuse, older women in Australia are at a higher risk of experiencing elder abuse and becoming homeless as a result compared to older men.³² The study also found that financial abuse was the most common form of elder abuse experienced by older women.³³ Research also suggests that older women who have experienced domestic violence earlier in life may also experience abuse and neglect as they age, leading to homelessness. HAAG's services also see a higher rate of elder abuse, particularly financial abuse among older women from CALD backgrounds who arrived on parent visas. They lack access to income support payments and other social services due to their visa status, making them reliant on adult children.

There are many older children either pressuring older women to sell the property and share the inheritance with them or financially and emotionally abuse older women. These women are less likely to complain about these abuses due to the fear of legal and other repercussions on the children.

Case study

Linda, now 78 years old was a nurse who retired about 10 years ago. After she retired, she invested her savings to help her daughter and son in law to buy a house and built a granny flat in the backyard in exchange for her right to live in the granny flat for the rest of her life.

Linda was looking forward to enjoying her retirement but her relationship with her daughter and son in law deteriorated very quickly. They tried to force her to move out of the property by harassing her visitors, including her home care workers; preventing her from using the garage and garbage bins; and calling the police claiming that Linda was confused and had dementia. They also prevented her from seeing her grandchildren.

Linda contacted an elder abuse service who provided her with legal support and linked her in with housing support through Home at Last in Victoria. Eventually Linda received a suitable social housing offer and she moved out. She is still in a legal battle to seek compensation for the money she invested in her daughter's house.

Consent was obtained to share the story

The discussion paper for the Strategy has a detailed discussion in relation to domestic and family violence leading to homelessness but lacks a specific and considered focus on elder abuse and the resulting impacts on health, homelessness and poverty among older women. Thus, it is critical that the Strategy focuses on elder abuse and related implications as a separate issue with references to recommendations from other parallel frameworks such as The Royal Commission into Aged Care Quality and Safety.

³² Australian Institute of Health and Welfare, Elder abuse, 2019, accessible at: <https://www.aihw.gov.au/reports/australias-welfare/elder-abuse>

³³ Ibid

Conclusion

There is a real opportunity to meaningfully address the challenges older women experience with tangible actions and outcomes through this Strategy. Aboriginal and Torres Strait Islander older women, from migrant and refugee backgrounds, LGBTQIA+ older people, older women with disability and those from rural, remote and regional areas experience additional challenges.

The current government's recognition of cohort specific housing challenges by ringfencing 4,000 housing units for older women and women escaping domestic and family violence is commendable. However, as demonstrated throughout this submission, that is not nearly enough to address the current and future demand for housing for older women. There is a clear need to increase the social and affordable housing stock to meet the current and future demand to prevent older women do not fall through the cracks.

There are also significant impacts of financial disadvantage older women experience due to inadequacy of income support payments and historical policy failures that leave older women with limited savings as a result of interrupted careers due to care responsibilities. All these challenges as well as discrimination and ageism impact older women's economic wellbeing, and mental and physical health.

Given the importance of this Strategy in addressing persistent disadvantages women experience, it is critical that voices of older women are embedded in the Strategy and other mechanisms to ensure they are involved in design, development and implementation.