

8 August 2024

National Housing and Homelessness Plan Bill (2024) (No. 2)
Senate Standing Committees on Economics
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Senate Standing Committees on Economics members

National Housing and Homelessness Plan 2024 Bill (No. 2) ('the Bill')

Thank you for the opportunity to provide feedback in relation to the above.

About QCOSS

Queensland Council of Social Service (QCOSS) is the peak body for the social service sector in Queensland. Our vision is to achieve equality, opportunity, and wellbeing for every person, in every community.

QCOSS leads the [Town of Nowhere](#) campaign advocating for change to end the housing crisis in Queensland, and is a partner of the national [Everybody's Home](#) campaign.

In June 2024, QCOSS along with [Town of Nowhere](#) campaign partners commissioned the [Breaking Ground: Progress update and assessment of Queensland housing crisis](#)¹ report. This report confirmed the housing crisis in Queensland is unabating one year on from the comprehensive assessment of the housing crisis undertaken in [A Blueprint to tackle Queensland's housing crisis](#) ('the Pawson Report'), which found the housing crisis to be unprecedented.²

QCOSS' position

QCOSS supports all measures in the Bill designed to improve governance and accountability mechanisms for national housing policy, and to set out an on-going Australian Government requirement to develop and implement a National Housing and Homelessness Plan (NHHP) using a human rights-based approach to housing across Australia.³

QCOSS also recommends the Bill be amended to ensure young people, as well as people experiencing domestic and family violence are engaged in planning and implementation of the NHHP as these discrete groups are more likely to require housing and homelessness support than the general population.⁴

¹ H Pawson, A Clarke, R van den Nouwelant, H Petersen, J Moore, and T Sigler. *Breaking ground: Progress update and assessment of Queensland's housing crisis*. Queensland Council of Social Services. 2024. Queensland Council of Social Services. 5 August 2024. https://www.qcoss.org.au/wp-content/uploads/2024/06/Report_Breaking-Ground_Progress-update-of-Queensland-Housing-Crisis_web.pdf

² H Pawson, A Clarke, J Moore, R van den Nouwelant, and M Ng. *A blueprint to tackle Queensland's housing crisis*. Queensland Council of Social Service. 2023. Accessed 5 August 2024. <https://www.qcoss.org.au/wp-content/uploads/2023/03/Hal-Pawson-Report-2023-Final.pdf>

³ The Parliament of the Commonwealth of Australia – Senate. *National Housing and Homelessness Plan Bill 2024 Explanatory Memorandum*. 2024. Accessed 5 August 2024. https://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id%3A%22legislation%2Fems%2Fs1416_ems_82f1cdf8-382a-4942-b65d-f2fe544bf123%22

⁴ Australian Institute of Health and Welfare. *Homelessness and homelessness services*. Australian Government. 2024. 5 August 2024, <https://www.aihw.gov.au/reports/australias-welfare/homelessness-andhomelessnessservices#:~:text=Australians%20known%20to%20be%20at%20particular%20risk%20of,health%20or%20social%20care%20arrangements%2C%20and%20older%20Australians>



Queensland's housing crisis

Queensland's current housing crisis has laid bare the vulnerabilities that exist in the housing system. Our frontline services are witnessing distressing levels of housing need and the human impacts of the same.⁵

Over the past 12 months, demand for homelessness support services increased in Queensland at rates higher than other states and territories, up more than nine per cent in the 2022-23 year when compared to the previous year.⁶ Rental costs have rapidly increased and rental affordability for low-income households has dramatically declined.⁷ Median rent in Queensland increased by a staggering 59 per cent in the five years from June 2019 to June 2024.⁸ Across Queensland the proportion of private rentals affordable to low-income households has plunged from 26 per cent in 2017 to just 10 per cent,⁹ and 150,000 Queensland households are estimated to have an unmet need for social and affordable housing.¹⁰

The extent of the housing crisis is also reflected in QCOSS' living affordability research. The 2023 Living Affordability in Queensland report found that housing was the number one cost of living priority, and housing costs were the highest expenditure for households.¹¹ The impact of the housing crisis is most impactfully described by people and families experiencing the crisis:

- "It makes life hard, renters are worried about losing a place to live or not being able to afford it."
- "It's just unbelievable how things have gotten so out of control so quickly. The government isn't helping us and the cost of housing is even more unbelievable. There's so many people who are homeless or can't afford food because housing is so expensive."
- "It's not fair, when you work hard at your full-time job, pay taxes and you can hardly afford to live as a single person, so I am still reliant on my mum for a place to live at 30 years of age."
- "It is very sad. There will be more and more people homeless and the generation after us will suffer."
- "I think more and more people are becoming homeless because of the cost of living. People are unable to live week to week when it's becoming more expensive every day. Prices are continuing to go up. Wages are not. People cannot save anymore. More and more friends becoming suicidal from pressures."¹²

The extent of the crisis is further reflected in feedback from QCOSS members. Our frontline services are witnessing distressing levels of housing need.¹³ Member organisations provide

⁵ Queensland Council of Social Service. *State of the Sector Report 2022*. 2023. 5 August 2024. <https://www.qcoss.org.au/publication/report-state-of-the-sector-2022/>

⁶ Pawson, Clarke, et al. 2024. p. 12

⁷ Ibid. 2024. p. 21-41

⁸ Residential Tenancies Authority (RTA). *Median value of weekly rent paid for new tenancies commencing in each quarter*. Queensland Government. June 2024. 5 August 2024. <https://www.rta.qld.gov.au/forms-resources/median-rents-quick-finder/median-rents-quarterly-data>

⁹ Pawson, Clarke, et al. 2024. p. 83

¹⁰ Pawson, Clarke, et al. 2023. p. 66

¹¹ Queensland Council of Social Service. *Living Affordability in Queensland 2023*. 2023. 5 August 2024. https://www.qcoss.org.au/wp-content/uploads/2024/01/Report_Living-Affordability-in-Qld-2023_web.pdf, p. 26
¹² Ibid. p. 27-28

¹³ Queensland Council of Social Service. *State of the Sector Report 2022*. 2023. 5 August 2024. <https://www.qcoss.org.au/wp-content/uploads/2023/03/State-of-the-Sector-Report-2022.pdf>

insight into the housing crisis from the perspective of workers in Queensland's community service sector:

- "I've been doing this sort of work for about 18 years now, and this is the hardest I've ever seen it... we used to get people walking out of here and we'd help them get a lease in place. That's really hard to do now."
- "The growing cost of living, limited rental properties and the increasing cost of rentals has developed a whole new cohort of homelessness with families and employed people not being able to find housing as well as the unemployed. This in turn affects business as there are less employees available for work as they have nowhere to live..."
- "The pressure on people to access or maintain affordable housing is impacting on all other areas of people's lives. Housing instability has increased mental health presentations, [DFV], financial distress, [and the] inability to afford basic needs such as medications, food, [and] transport."
- "The cost of housing plays a major part in young people moving forward, especially those who are on Centrelink. They don't get a look in when applying for private rentals."
- "[the housing crisis] is impacting my staff. I've got staff that have struggled with homelessness. They've been in long term tenancies, had to leave, couldn't get accommodation, so they had to live with family or in temporary accommodation until they could find something. So that's continuing to impact on people who have secure jobs."
- "Service providers in the disability field are finding it increasingly difficult to find suitable housing for people with disability."
- "We have an increased number of people who are over the age of 50, married, with retirement funds, that are facing homelessness. People who have gone into rent arrears because their rent has increased... Our demographic has changed to include a lot of people who should be well into their silver years and happily retiring."
- "The housing crisis is extreme, and older women are experiencing this in greater numbers than ever before."¹⁴

The housing crisis is continuing in Queensland, and a lack of national strategic and long-term housing and homelessness planning over decades has contributed to the housing and homelessness crisis in Queensland and Australia.¹⁵

Recommendations

Every person has a right to an adequate standard of living, which includes a right to housing.¹⁶ Secure, affordable, and appropriate housing is essential for the wellbeing and dignity of people and families in Australia.¹⁷ The Federal Government can significantly contribute to permanently ending the housing crisis and homelessness in Queensland and across Australia through strategic, broadly scoped, and long-term commitments to end unmet housing need and homelessness in Australia.^{18,19}

Independent research by housing and homelessness experts confirms that better housing and homelessness outcomes are achieved when housing strategy and planning is rights-

¹⁴ Ibid.

¹⁵ Pawson, Clarke, et al. 2023. p. 10, 86-88

¹⁶ Australia Human Rights Commission. *Housing, homelessness and human rights*. 2024. 5 August 2024, <https://humanrights.gov.au/our-work/rights-and-freedoms/projects/housing-homelessness-and-human-rights>

¹⁷ United Nations. *The human right to adequate housing. Special Rapporteur on the right to adequate housing*. 5 April 2024. <https://www.ohchr.org/en/special-procedures/sr-housing/human-right-adequate-housing>

¹⁸ Pawson, Clarke, et al. 2023. p. 86-88

¹⁹ Pawson, Clarke, et al. 2024.

based and has a statutory basis, including enshrining the right to adequate housing and nominating institutions as lead bodies, as well as establishing advice and accountability bodies.²⁰ An example of this is the contemporary legislative approach effectively implemented by the Canadian Government to establish long-term institutional architecture to lead and implement national housing and homelessness policy within an inter-connected multi-jurisdictional environment.²¹

Consistent with recommendations in the Towards an Australian Housing and Homelessness Strategy report,²² and extensive support from the community service sector and housing and homelessness experts,²³ QCOSS strongly supports the Bill and the four key measures proposed in the Bill, including:

- the Minister must develop a National Housing and Homelessness Plan in a collaborative process and with the assistance of expert advice
- Housing Australia is to assist the Minister in the development, implementation and maintenance of the National Housing and Homelessness Plan
- a National Housing Consumer Council is established to provide advice on the National Housing and Homelessness Plan from the perspective of consumers
- a National Housing and Homelessness Advocate is established to independently monitor the progress of the National Housing and Homelessness Plan and to undertake reviews into systemic housing issues.²⁴

Recommendation 1: Implement the National Housing and Homelessness Bill 2024 (No. 2), including measures that require:

- the Minister must develop a National Housing and Homelessness Plan in a collaborative process and with the assistance of expert advice
- Housing Australia is to assist the Minister in the development, implementation and maintenance of the National Housing and Homelessness Plan
- a National Housing Consumer Council to be established to provide advice on the National Housing and Homelessness Plan from the perspective of consumers
- a National Housing and Homelessness Advocate to be established to independently monitor the progress of the National Housing and Homelessness Plan and to undertake reviews into systemic housing issues.

QCOSS supports Section 8 of the Bill, which defines that the NHHP must be a 10-year plan that is directed towards:

- ensuring that everyone in Australia has adequate housing
- preventing and ending homelessness

²⁰ Martin, C., Lawson, J., Milligan, V., Hartley, C., Pawson, H. and Dodson, J. *Towards an Australian Housing and Homelessness Strategy: understanding national approaches in contemporary policy*. AHURI Final Report No. 401. Australian Housing and Urban Research Institute. 2023. Melbourne. <https://www.ahuri.edu.au/research/final-reports/401>. doi: 10.18408/ahuri7127901,20. p. 64-65

²¹ Ibid. p. 46-51.

²² Ibid.

²³ Open letter. *The Case for Legislating the National Housing and Homelessness Plan*. 2024. 5 August 2024. https://cityfutures.ada.unsw.edu.au/documents/747/The_case_for_legislating_the_NHHP_-_open_letter_v7_-_19_June.pdf

²⁴ National Housing and Homelessness Bill 2024 (No. 2) (Cth). https://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id%3A%22legislation%2Fbills%2Fs1416_first-senate%2F0000%22;rec=0

- ensuring the social housing system meets needs and drives wider housing system improvement
- improving choice in the housing system, including between owning and renting
- improving housing quality, including the quality of existing and newly constructed housing
- improving housing affordability
- improving housing supply
- improving the contribution of the housing system to wider economic performance
- improving the ability of people with disability to live in the community, with choices equal to others
- involving Aboriginal and Torres Strait Islander Peoples in developing, determining and administering housing programs affecting them.²⁵

QCROSS is pleased that improving the ability for people with disability to live in the community and involving Aboriginal and Torres Strait Islander People in determining and administering housing programs affecting them are specifically identified in the Bill.

QCROSS recommends that two additional requirements be added to Section 8 to ensure that the voices and specific support requirements of young people and people experiencing domestic and family violence are also incorporated into the NHHP. It is important that young people and people experiencing domestic and family violence are identified in the Bill as mandatory considerations for the NHHP, as these discrete groups are much more likely than the general population to require housing and homelessness support and to have unique support needs.²⁶

Recommendation 2: Add two additional requirements to Section 8 of the Bill to ensure that the voices and specific support requirements of young people and people experiencing domestic and family violence are incorporated into the NHHP.

Other related matter - income support

It is well established that working-age income support payments are inadequate to keep people from living in poverty. “Australia’s working-age income support payments are completely inadequate to cover the cost of essentials such as housing, food and energy... leaving many risking homelessness.”²⁷ The inadequacy of the current income payment is resulting in people being unable to afford housing and puts people at risk of homelessness.²⁸

The Living Affordability in Queensland 2023 report found that besides from older couples accessing the Age Pension, none of the households accessing income support payments received enough income to meet a basic standard of living, and this resulted in high stress and poor mental health outcomes.²⁹

²⁵ Ibid. p. 6.

²⁶ Australian Institute of Health and Welfare. *Housing and Homelessness Services*. Australian Government. 2024. <https://www.aihw.gov.au/reports/australias-welfare/homelessness-and-homelessness-services>. p.2-3

²⁷ Australian Council of Social Service. *It's not enough: Why more is needed to lift people out of poverty*. 2023. https://www.acoss.org.au/wp-content/uploads/2023/09/ACOSS_COL_Report_Sep_2023_Web.pdf p.2-4

²⁸ Ibid. p. 3-5

²⁹ Queensland Council of Social Service. *Living Affordability in Queensland 2023*. 2024. https://www.qcross.org.au/wp-content/uploads/2024/01/Report_Living-Affordability-in-Qld-2023_web.pdf

Income support and rent assistance must be substantially increased to bring them into parity with other Commonwealth pensions, so that people who are reliant on income support are lifted out of poverty and cost of living stress is reduced.

Recommendation 3: Immediately provide a substantial increase in working-aged income payments and rent assistance payments to lift people receiving income payments out of poverty.

Other related matter - Rental reforms

The current housing crisis demonstrates the vulnerability of renters in an insufficiently regulated rental market. As discussed in the Pawson Report, strengthening rental market regulation is one policy option to tackle the housing crisis.³⁰

QCROSS welcomes the Better Deal for Renters announcement following the National Cabinet meeting in August 2023 as it recognised the need to improve renter rights in Australia.³¹ However, detail about how each initiative identified in the announcement will be developed and implemented is yet to be forthcoming. Proposed initiatives also do not go far enough to improve renter rights and security, such as only limiting the frequency of rent increases without also limiting rent increase amounts and allowing many exceptions to no grounds evictions.

The federal, state and territory governments must work together to enhance renter rights, and progress initiatives that strengthen protections for renters, including:

- limiting rent increases by an amount calculated in reference to the Consumer Price Index and include mechanisms to effectively limit frequency of increases. We draw particular attention to the approach adopted in the Australian Capital Territory in relation to rent increases³²
- ending 'without grounds' evictions, including no grounds evictions at the end of a fixed term agreement
- implementing energy efficiency standards for renters.³³

Recommendation 4: Working together federal, state and territories must strengthen and harmonise renter rights and protections across Australia through rental reforms.

Conclusion

The latest social housing register data for Queensland confirms more than 45,000 people are waiting to access social housing, and the average wait time for housing has increased to nearly two and half years.³⁴ There are approximately 150,000 households in Queensland with an unmet need for affordable housing, and more than 100,000 of those households are eligible for social housing based on income.³⁵ Without the establishment of the institutional architecture to support accountability and commitment to lead national housing and homelessness policy, the housing and homelessness crisis is likely to continue.

³⁰ Pawson, Clarke, et al. 2023. p. 94.

³¹ National Cabinet. *Working together to provide better outcomes – Attachment 2: A Better Deal for Renters*. August 2023. <https://www.pm.gov.au/media/meeting-national-cabinet-working-together-deliver-better-housing-outcomes#a2>

³² *Residential Tenancies Act 1997* (ACT) ss 64A – 70; *Residential Tenancies Regulation 1998* (ACT) s 5A.

³³ Queensland Council of Social Service. *Submission to Residential Tenancies and Rooming Accommodation and Other Legislation Bill 2024*. 2024. <https://www.qcross.org.au/publication/submission-residential-tenancies-and-rooming-accommodation-and-other-legislation-amendment-bill-2024/>

³⁴ Department of Housing, Local Government, Planning and Public Works, *Social housing register 31 March 2024*.

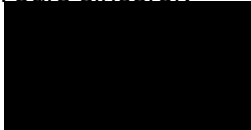
Queensland Government. July 2024. 5 August 2024. <https://www.data.qld.gov.au/dataset/social-housing-register>

³⁵ Pawson, Clarke. 2023. p. 79

QCOSS strongly supports implementation of the Bill as it will establish institutional architecture to lead and implement rights-based, long-term national housing and homelessness policy. The infrastructure and long-term planning proposed in the Bill will enhance the Federal Government's accountability, capacity, and commitment to develop NHHPs that are broad reaching and long-term with a greater ability to end housing need and homelessness in Queensland and across Australia.

Thank you again for the opportunity to provide the submission. If you have any questions, please contact Aimee McVeigh, Chief Executive Officer at [REDACTED].

Yours sincerely

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Aimee McVeigh
Chief Executive Officer