



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

August 2024



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Our Commitment to Inclusion

The Salvation Army Australia acknowledges the Traditional Owners of the land on which we meet and work and pay our respect to Elders, past, present and future.

We value and include people of all cultures, languages, abilities, sexual orientations, gender identities, gender expressions and intersex status. We are committed to providing programs that are fully inclusive. We are committed to the safety and wellbeing of people of all ages, particularly children. Our values are:

- Integrity
- Compassion
- Respect
- Diversity
- Collaboration

The Salvation Army is a worldwide movement known for its acceptance and unconditional love for all people. We love unconditionally, because God first loved us. The Bible says, “God so loves the world” (John 3:16, RGT). As both a church and charity, we believe all people are loved by God and are worthy of having their needs met. Everyone is welcome to find love, hope, and acceptance at The Salvation Army.

The Salvation Army Australia Territory wishes to acknowledge that members of the LGBTIQ+ community have experienced hurt and exclusion because of mixed comments and responses made in the past. The Salvation Army is committed to inclusive practice that recognises and values diversity. We are ensuring our services affirm the right to equality, fairness, and decency for all LGBTIQ+ people, rectifying all forms of discriminatory practice throughout the organisation.

We seek to partner with LGBTIQ+ people and allies to work with us to build an inclusive, accessible, and culturally safe environment in every aspect of Salvation Army organisation and services. Everyone has a right to feel safe and respected.

Learn more about our commitment to inclusion: <salvationarmy.org.au/about-us>

More information about The Salvation Army is at **Appendix A**.





Executive Summary

The Salvation Army welcomes the opportunity to provide this submission to the Senate Economics Legislation Committee (the Committee) in relation to the National Housing and Homelessness Plan Bill 2024 (No.2) (the Bill).

The Salvation Army is a major provider of housing and homelessness services across Australia. We provide homes for individuals and families experiencing, or at risk of, homelessness. We manage 1,800 properties across the country which support more than 3,000 people. Every day we witness the real and human impact of Australia's escalating housing crisis. Many Australians are denied safety and stability as they struggle to access secure, affordable, and sustainable housing.

Access to adequate housing is a basic human need and a fundamental human right. It is about more than just having a roof over one's head; housing must be habitable, accessible, affordable, and culturally appropriate. When this need is not met, it becomes difficult or untenable for community members to pursue and realise other needs, goals, or aspirations.

The Salvation Army supports a legislative model which is rights focused, equitable and allows all people to live with dignity. We urge that a commitment to realising the right to housing and alleviating hardship requires coordination and collaboration across commonwealth, state, and territory jurisdictions.

We hold the view that the greatest impact in addressing Australia's housing crisis will be achieved by targeting the structural drivers of homelessness and poverty. Legislating a national response is a critical step in implementing meaningful responses which address these structural factors.

This submission responds to parts 2, 3 and 4 of the Bill, specifically:

- National Housing and Homelessness Plan,
- National Housing and Consumer Council, and
- National Housing and Homelessness Advocate.

The Salvation Army recommends the National Housing and Homelessness Plan Bill 2024 (No.2) be passed. We are supportive of the themes contained within, and sentiment behind the Bill. We recommend the Committee consider the following amendments to further strengthen this legislation:

- Expanding the National Housing Consumer Council to include age and gender diverse members and those with lived experience of family and domestic violence, and
- Expanding the function of the National Housing and Homelessness Advocate to include communicating rights norms with rights holders, and streamlining information sharing about systemic housing issues across jurisdictions.

The Salvation Army has made **4** recommendations for the Senate Economics Legislation Committee to consider. A summary of these recommendations follows on the next page.





Summary of Recommendations

Recommendation 1

1.7 The Salvation Army recommends that the National Housing and Homelessness Bill 2024 (No.2) be passed.

Recommendation 2

2.6 The Salvation Army recommends the Australian Government include Council members that are gender and age diverse to address unique needs and challenges faced by these communities.

Recommendation 3

2.10 The Salvation Army recommends the Australian Government to include Council members with lived experience of family and domestic violence.

Recommendation 4

3.6 The Salvation Army recommends that the Bill be amended to include additional functions within the role of the role of National Housing and Homelessness Advocate, including communicating rights norms with rights holders, and streamlining information sharing across Australian jurisdictions.



1 National Housing and Homelessness Plan

- 1.1 The Salvation Army strongly supports the National Housing and Homelessness Plan Bill 2024 (No.2). We support the notion of housing being a fundamental human right and the proposal that Australia recognise and adopt a human rights focused approach. We recommend the Bill be passed by Parliament.
- 1.2 We commend the Bill's comprehensive approach and particularly endorse the provisions outlined in Part 2, National Housing and Homelessness Plan (the Plan). We believe that the development of a plan to address and respond to housing inequity under the Bill sets a solid foundation to address systemic and pervasive housing and homelessness issues across Australia.
- 1.3 We welcome the Bill's emphasis on using a collaborative process in preparing the National Housing and Homelessness Plan, referenced in Sections 6 and 9. Including civil society organisations, groups experiencing disadvantage, and individuals with lived experience of housing need and homelessness, ensures that diverse perspectives are reflected in policymaking. Inclusive approaches are essential in developing policies that recognise and address the root causes of homelessness.
- 1.4 We strongly support the inclusion of Aboriginal and Torres Strait Islander Peoples in developing, determining, and administering housing programs as stated in Section 8(1)(j). Culturally appropriate Aboriginal and Torres Strait Islander housing solutions are vital for communities to ensure their specific needs are met and unique contexts considered.
- 1.5 The Salvation Army endorses the comprehensive objectives outlined in the Plan in Section 8 which include: ensuring adequate housing for all, preventing and ending homelessness, and improving housing quality, affordability, and supply. These objectives align with The Salvation Army's mission to provide safe and secure housing for those in need.
- 1.6 The triennial and final reviews of the Plan established in Sections 12 and 13 ensure continuous evaluation and improvement. This accountability mechanism is crucial in adapting to changing and evolving housing needs and ensuring the effectiveness and relevance of implemented measures.

Recommendation 1

- 1.7 **The Salvation Army recommends that the National Housing and Homelessness Bill 2024 (No.2) be passed.**



2 National Housing Consumer Council

- 2.1 The Salvation Army welcomes the establishment of the National Housing Consumer Council (the Council) as part of the National Housing and Homelessness Plan Bill. We urge the critical need to include diverse voices in the Council's membership by including representation of those with lived experiences of issues identified under the Council's functions in section 17(1)(iii-x).

Gender & Age Diversity

- 2.2 To further strengthen the Bill and contribute to long term effective housing and homelessness solutions in Australia, The Salvation Army highlights the importance of ensuring gender and age diversity within the Council. Different gender and age groups face unique housing challenges and needs. By including these diverse perspectives, policy recommendations that address specific challenges become more comprehensive, meaningful, and effective.
- 2.3 Women aged 55 and over are the fastest growing cohort experiencing homelessness,¹ with experiences of homelessness increasing by 31 per cent from 2016 to 2021.² We fear that this trend will continue in the current housing climate given the ongoing shortages of affordable housing and the significant gaps in wealth accumulation between men and women.³
- 2.4 Young people experiencing homelessness in Australia is also of significant concern, with those aged 12 to 24 making up 37 per cent of the homeless population in 2021.⁴ As many as one in ten young people who responded to Mission Australia's 2023 Youth Survey faced homelessness in the past year.⁵ This alarming statistic underscores the importance of including young people with lived experience in this conversation through the National Housing Consumer Council.
- 2.5 People who identify as gender diverse and the LGBTQIA+ community face unique challenges in accessing secure and appropriate housing. A report by the Australian Housing and Urban Research Institute (AHURI) found that LGBTQIA+ people experience higher rates of homelessness compared to heterosexual peers due to discrimination and lack of acceptance within their families and communities.⁶

¹ Patterson, K. (2019). *Older Women's Risk of Homelessness: Background Paper*. Australian Human Rights Commission 2019. <https://humanrights.gov.au/our-work/commission-general/publications>

² Australian Bureau of Statistics. (2021). *Estimating Homelessness: Census*. ABS. <https://www.abs.gov.au/statistics/people/housing/estimating-homelessness-census/latest-release>.

³ Patterson, K. (2019). *Older Women's Risk of Homelessness: Background Paper*. Australian Human Rights Commission 2019. <https://humanrights.gov.au/our-work/commission-general/publications>

⁴ Australian Bureau of Statistics. (2021). *Estimating Homelessness: Census*. ABS. <https://www.abs.gov.au/statistics/people/housing/estimating-homelessness-census/latest-release>.

⁵ Burgess, A. (2024, August 1). *Mission Australia survey finds one in 10 young people polled faced homelessness in past year*. ABCNews. <https://www.abc.net.au/news/2024-08-01/one-in-10-youth-faced-homelessness-in-2023-mission-australia/104158672>

⁶ Stone, W. et al.. (2024). *Gendered housing matters: toward gender-responsive data and policy making, AHURI Final Report No. 415*. Australian Housing and Urban Research Institute Limited, Melbourne. <https://www.ahuri.edu.au/research/finalreports/415>, doi: 10.18408/ahuri5129901



Recommendation 2

- 2.6 The Salvation Army recommends the Bill be amended to include Council members that are gender and age diverse to address unique needs and challenges faced by these communities.**

Family and Domestic Violence

- 2.7 Family and domestic violence is one of the leading causes of homelessness in Australia. In 2020-2021, family violence was identified as a primary reason for seeking housing assistance by 41 per cent of people accessing specialist homelessness services.⁷
- 2.8 The trauma and disruption caused by family violence often forces victim-survivors, individuals and families, to flee their homes seeking safety. This not only results in immediate housing instability but also long-term challenges in securing safe, stable, and affordable housing. Victim-survivors of family and domestic violence, therefore, are a critical group to include in discussions about preventing and responding to housing and homelessness issues.
- 2.9 Firsthand knowledge will guide the development of policies and programs to address housing stress and homelessness in a manner which is responsive to the needs of those impacted by family violence. Such an approach would not only prompt addressing and alleviating immediate housing needs but also promote long-term stability and wellbeing related responses, breaking the cycle between violence and homelessness.

Recommendation 3

- 2.10 The Salvation Army recommends the Bill be amended to include Council members with lived experience of family and domestic violence.**

⁷ Australian Institute of Health and Welfare. (2024). *Specialist homelessness services annual report 2022–23*. <https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-annual-report>



3 National Housing and Homelessness Advocate

- 3.1 The Salvation Army are supportive of the proposed establishment of a National Housing and Homelessness Advocate (the Advocate) under the Bill.
- 3.2 Accountability mechanisms are essential in policy reform.⁸ Legislating an independent Advocate which monitors the progress of the National Housing and Homelessness Plan will create a central oversight mechanism and will encourage transparency in governmental housing responses. This will, in turn, increase the credibility of the Plan.
- 3.3 The Salvation Army supports the Advocate's independence as an essential element as well as the spirit of the functions in section 23. We encourage that the Advocate's role replicates that of a 'trusted friend' rather than a punitive regulator of the Plan. Cooperation, consultation, and engagement will be enhanced amongst both government and non-government stakeholders in the adoption of a neutral, overseeing role.
- 3.4 In addition to the functions listed, The Salvation Army considers the following additional functions may be of benefit in achieving goals under the Advocate's remit:
 - **Engaging with rights holders** to prepare and communicate rights norms and government obligations under the legislation which will enhance the legislation's community accessibility, and
 - **Communicating** systemic housing issue recommendations with state and territory governments to streamline information sharing, and to encourage proactive and tailored responses to housing need in different Australian jurisdictions.

Recommendation 4

- 3.5 **The Salvation Army recommends that the Bill be amended to include additional functions within the role of the role of National Housing and Homelessness Advocate, including communicating rights norms with rights holders, and streamlining information sharing across Australian jurisdictions.**

⁸ Martin, C., C., Lawson, J., Milligan, V., Hartley, C., Pawson, H. and Dodson, J. (2023) *Towards an Australian Housing and Homelessness Strategy: Understanding National Approaches in Contemporary Policy*, AHURI Final Report No. 401. Australian Housing and Urban Research Institute Limited, Melbourne. <https://www.ahuri.edu.au/research/final-reports/401>.



4 Conclusion

- 4.1 The Salvation Army thanks the Senate Economics Legislation Committee for the opportunity to provide a written submission.
- 4.2 The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance. Further information can be sought from government.relations@salvationarmy.org.au.

The Salvation Army Australia Territory

August 2024



Appendix A About The Salvation Army

The Salvation Army is an international Christian movement with a presence in more than 130 countries. Operating in Australia since 1880, The Salvation Army is one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion.

The Salvation Army Australia provides more than 1,000 social programs and activities through networks of social support services, community centres and churches across the country.

Programs include:

- Financial counselling, financial literacy and microfinance
- Emergency relief and related services
- Homelessness services
- Youth services
- Family and domestic violence services
- Alcohol, drugs and other addictions
- Chaplaincy
- Emergency and disaster response
- Aged care
- Employment services

As a mission-driven organisation, The Salvation Army seeks to reduce social disadvantage and create a fair and harmonious society through holistic and person-centred approaches that reflect our mission to share the love of Jesus by:

- Caring for people
- Creating faith pathways
- Building healthy communities
- Working for justice

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

Further information about The Salvation Army can be accessed at: <
<https://www.salvationarmy.org.au/>>

