



ACTCOSS Budget Priorities 2016-17

October 2015

About ACTCOSS

ACTCOSS acknowledges Canberra has been built on the land of the Ngunnawal people. We pay respects to their Elders and recognise the strength and resilience of Aboriginal and Torres Strait Islander peoples. We celebrate Aboriginal and Torres Strait Islander cultures and ongoing contribution to the ACT community.

The ACT Council of Social Service Inc. (ACTCOSS) is the peak representative body for not-for-profit community organisations, people living with disadvantage and low-income citizens of the Territory.

ACTCOSS is a member of the nationwide COSS network, made up of each of the state and territory Councils and the national body, the Australian Council of Social Service (ACOSS).

ACTCOSS' vision is to live in a fair and equitable community that respects and values diversity, human rights and sustainability and promotes justice, equity, reconciliation and social inclusion.

The membership of the Council includes the majority of community based service providers in the social welfare area, a range of community associations and networks, self-help and consumer groups and interested individuals.

ACTCOSS receives funding from the ACT Government.

ACTCOSS advises that this document may be publicly distributed, including by placing a copy on our website.

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Acronyms

ABS	Australian Bureau of Statistics
ACAT	ACT Civil and Administrative Tribunal
ACT	Australian Capital Territory
ACTCOSS	ACT Council of Social Service Inc.
ADACAS	ACT Disability Aged and Carer Advocacy Service
AHURI	Australian Housing and Urban Research Institute
AIHW	Australian Institute of Health and Welfare
CCL	Canberra Community Law
CHC	Community Housing Canberra
CSD	Community Services Directorate
DVCS	Domestic Violence Crisis Service
ETD	Education and Training Directorate
FTE	Full-time equivalent
NAPLAN	National Assessment Program – Literacy and Numeracy
NDIS	National Disability Insurance Scheme
NRAS	National Rental Affordability Scheme
OECD	Organisation for Economic Cooperation and Development
PISA	Program for International Student Assessment
SES	Socio-economic Status
SHS	Specialist Homeless Services
STS	Supportive Tenancy Service
TIS	Translating and Interpreting Service
WCHM	Women’s Centre for Health Matters

Overview

This Budget comes at a time of economic uncertainty, locally and nationally, and in a context of growing inequality in Australia and around the world (ACOSS 2015: 8-9). Getting our social policy settings right is critical to realising the ACT Government's aim of growth and diversification of the ACT economy.

This submission argues that improving social inclusion and equality should be the core agenda guiding spending decisions in the 2016-17 ACT Budget. In June 2016 ACTCOSS will assess the 2016-17 Budget according to whether and how adequately investments and measures improve outcomes for people whose housing, education, and broader economic and social indicators measure in the bottom 40 percent.

There are specific groups in our community who consistently miss out on both resources and opportunities, and face significant discrimination when they seek to exercise their rights and access services. These groups include Aboriginal and/or Torres Strait Islander peoples, young people, women, people who identify as lesbian, gay, bisexual, transgender and/or intersex, and people for whom English is not their first language. ACTCOSS will be looking for specific measures in the 2016-17 Budget that will improve outcomes for these groups. We will be assessing whether and how adequately investments and measures in the ACT Budget address service barriers, gaps and capability for these members of our community.

Housing, education and transport are all areas of high community need in the ACT. This submission argues that housing, educational and transport infrastructure intersect to create the opportunities and protections needed to guard against the risks and consequences of economic and social exclusion and establish the foundations for social mobility. If we do not plan for the needs of people who experience discrete, but far more often, overlapping disadvantage in the areas of housing, education and transport we are entrenching disadvantage in our community.

Critical gaps in the social safety net in the ACT need to be recognised and addressed to reduce the risk of exclusion from access to resources and services that reduce vulnerability and prevent escalation of needs. The ACT, as one of the most prosperous jurisdictions in the nation, ought to be able to provide this minimum safety net to all residents.

This submission provides extensive evidence to support our 50 brief recommendations and background, context and impact analysis in support of our six detailed recommendations.

Recommendations

Community Need in the ACT

RECOMMENDATION 1: Fund a Socio-Economic Index for Individuals (SEIFI) data set drawn from the 2011 ABS Census.

Affordable and accessible rental housing

Detailed Recommendations

DETAILED RECOMMENDATION 1: Sustain funding for existing housing-related legal services and increase access to tenancy advice/advocacy/legal assistance and links with support that can address individual risk factors for tenants/owners at risk of losing their housing by maintaining existing legal services and providing ongoing funding for the Street Law program.

DETAILED RECOMMENDATION 2: Sustain secure funding for existing housing-related legal services and increase access to tenancy advice/advocacy/legal assistance and links with support that can address individual risk factors for tenants/owners at risk of losing their housing by maintaining existing legal services and providing ongoing funding for the Supportive Tenancy Service.

DETAILED RECOMMENDATION 3: Fund independent professional housing advocacy for people living with disability, including mental health, by investing funding for one FTE dedicated housing advocacy position to be based at ADACAS.

DETAILED RECOMMENDATION 4: Increase in Funding for COTA ACT's Housing Option Advice Service to cover two FTE staff.

DETAILED RECOMMENDATION 5: The ACT Government divert \$100 million from its investment portfolio in bonds to create an investment fund for community housing providers for the purpose of building new accessible, affordable rental housing. The fund would be held in perpetuity and repaid at government bond rates.

DETAILED RECOMMENDATION 6: Fund housing and homelessness original research and subsequent policy and advocacy work to be undertaken by the Housing Policy Consortium peak bodies: ACT Shelter, the ACT Council of Social Service, the Youth Coalition of the ACT, and the Women's Centre for Health Matters.

Brief Recommendations

RECOMMENDATION 2: Sustain funding to Commonwealth/ACT joint funded programs under the National Partnership Agreement on Homelessness, even if the Commonwealth withdraws funding AND Improve access to emergency housing.

RECOMMENDATION 3: All directorates to report on how their roles and responsibilities impact on homelessness and the supply of accessible, affordable housing as part of their annual reporting requirements

RECOMMENDATION 4: Any directorate not already contributing at least one percent of their operating budget to housing and/or reducing homelessness to allocate one percent of their operating budget to fund additional measures that increase provision of services to reduce homelessness and increase supply of accessible, affordable housing.

RECOMMENDATION 5: Provide recurrent funding for the Corrections Throughcare initiative as this program has a significant impact on accessing and sustaining housing after a period of incarceration in the criminal justice system.

RECOMMENDATION 6: Fund knowledge and skills development so that people working with men and women exiting out-of-home care, mental health, drug and alcohol, acute health care, criminal justice, and homelessness services are able to provide tenancy advice/advocacy/support.

RECOMMENDATION 7: Legislate a set of minimum standards in energy efficiency for private rental properties, whilst maintaining affordable rents.

RECOMMENDATION 8: Apply the principles underpinning the Affordable Rental Scheme (that sets rent payments as a percentage of income instead of a percentage of market rent), currently open to people over 65 who meet an income eligibility threshold, to a wider group of low income households in order to create a system that could be applied to all people experiencing disadvantage in the ACT.

RECOMMENDATION 9: Provide seed funding to support development of partnerships between the private real estate industry and housing support services, including:

- The Supportive Tenancy Service—to increase its reach into the private rental market, recognising the benefits of tenancy support to government, landlords, real estate agents and tenants.
- The Human Services Gateway—to increase access to private rental market accommodation options.

RECOMMENDATION 10: Establish a Community/Government/Industry Steering Group to oversight and provide advice on implementation and evaluation of effectiveness of the Affordable Housing Action Plan.

RECOMMENDATION 11: Require all new dwellings to comply with universal design standards.

RECOMMENDATION 12: Expand the Energy Efficiency Program and the Outreach Program to more proactively engage private sector and community housing landlords and tenants who are unable to afford fee-for-service support.

RECOMMENDATION 13: The ACT Government offer incentives for landlords to increase the energy efficiency of their homes so fewer tenants need to rely on energy and water concessions in order to meet their energy costs.

RECOMMENDATION 14: Establish a Community/Government/Industry Steering Group to oversight and provide advice on implementation and evaluation of effectiveness of the Affordable Housing Action Plan.

Education

RECOMMENDATION 15: Report on the investment in, uptake and impact of the Engaging Schools Framework to understand whether it is on track to meet the needs of all students, including those most at risk of disengaging from education.

RECOMMENDATION 16: Resourcing the Progressing Parental Engagement Project so it can appropriately support schools to work with and engage with a range of families, including Aboriginal and Torres Strait Islander families, low socio economic families and refugee families.

RECOMMENDATION 17: Investment in and expansion of successful programs that increase the capacity of schools to work well with students with a history of trauma, including training for teachers and partnerships with services outside of schools.

RECOMMENDATION 18: Increase resourcing to improve educational outcomes and close the gap in educational outcomes for Aboriginal and Torres Strait Islander students. This should involve schools and Education and Training Directorate investing in building the capacity of schools to work with Aboriginal and Torres Strait Islander families to improve educational outcomes for Aboriginal and Torres Strait Islander young people.

RECOMMENDATION 19: Invest in building the capacity of community based Aboriginal & Torres Strait Islander services, who have established connections with families, to work collaboratively with schools and other community services to improve educational outcomes for young people and their families.

RECOMMENDATION 20: Invest in building the capacity of community based Aboriginal & Torres Strait Islander services, who have established connections with families, to work collaboratively with schools and other community services to improve educational outcomes for young people and their families.

RECOMMENDATION 21: Evaluate referral mechanisms used by schools and teachers to connect students and their families to community and health services.

RECOMMENDATION 22: Invest in community services to increase capacity to partner with schools and provide targeted intensive supports to young people and their families.

RECOMMENDATION 23: Refocus investment in the needs of students experiencing disadvantage early and continue throughout childhood and teenage years using long term programs that support young people through their schooling lifetime.

RECOMMENDATION 24: Provide new funding for early intervention in the early childhood and education settings for young children with social and emotional

support needs that put them at risk of low education attainment to improve their engagement in learning and strengthen their peer relationships.

RECOMMENDATION 25: Increased intensive focus on students aged 8-12 years old showing low attainment and at risk of entering high school unable to participate.

RECOMMENDATION 26: Invest in community services to provide targeted support to children and young people, particularly those aged 8-12 showing low attainment and at risk of entering high school unable to participate, to successfully transition from primary to high school.

RECOMMENDATION 27: Evaluate the short and medium / longer term educational engagement and employability outcomes for young people who have participated in the ACT Flexible Learning Options program. Based on the findings of this evaluation, invest in an evidence based approach to flexible learning options that includes a focus on education and employment outcomes at 6, 12 and 18 months.

RECOMMENDATION 28: Continue to support services that provide case management and group work in schools and expand resources to expand capacity and reach of services who work collaboratively with schools.

Transport

RECOMMENDATION 29: Assess investment in transport against the impact of transport infrastructure spending on increasing the affordability and accessibility of transport for people who are transport disadvantaged to access work, health and education facilities, food and other shopping amenities, and social networks.

RECOMMENDATION 30: Improve and increase access to public transport in neighbourhoods and regional centres, with a focus on increasing affordable and accessible transport for East-West travel.

RECOMMENDATION 31: Expand the 2015-16 investment to improve accessibility of bus stops, lighting and pedestrian infrastructure.

RECOMMENDATION 32: Provide funding to remedy the layouts of bus interchanges and location of taxi ranks to make them more accessible for people with disabilities.

RECOMMENDATION 33: Expand eligibility for and promotion of Flexibus to any residents in the areas covered who are transport disadvantaged.

Critical gaps in social services and our safety net

Translating and Interpreting Service

RECOMMENDATION 34: Fund organisations to access TIS services.

RECOMMENDATION 35: Until the review and reform of the ACT HACC Program occurs, provide access to one-off individual HACC funding for clients who cannot access HACC Services due to lack of places. This should be flexible to providing whatever support type is needed.

NDIS Transition

RECOMMENDATION 36: Design funding to be responsive to the support needs that are created when individuals living with mental illness who may be eligible for the NDIS choose not to be participants, preferring to access services outside of the context of the NDIS.

RECOMMENDATION 37: Ensure that NDIS Information, Linkage and Capacity Building (ILC) services, include the design and development of aids and equipment; advice, information; peer networking; and independent advocacy, and remain viable and available to all people living with disability in the ACT. Where necessary and appropriate this may require ongoing block funding.

RECOMMENDATION 38: Ensure that people who are not eligible for the NDIS but require home-based support (currently provided through HACC Services) are able to access services appropriate to individual need and that existing services are adequate to meet current and future demand, with annual growth funding included in the design of the program.

RECOMMENDATION 39: Where there is evidence of need, provide growth funding for services. For example, services for people who have cognitive and decision-making challenges concurrent with physical and mental health issues.

RECOMMENDATION 40: Establish a Capital Housing Support Program to provide expert advice to people with disability and/or families/supporters who are considering home modifications to their family home, or the purchase of a new property, or accessing equity in their family home, to provide suitable and secure housing tenure for their family member or members with disability.

RECOMMENDATION 41: The ACT Government work closely with the Australian Government and the National Disability Insurance Agency to investigate and develop appropriate housing options under the National Disability Insurance Scheme including housing modifications, user cost of capital funding or Special Disability Trusts to provide increased 'choice and control' for secure and long-term housing for people with disability.

Concessions Program

RECOMMENDATION 42: Sustain public housing tenant rent charges at 25 percent of assessable income.

RECOMMENDATION 43: Maintain seniors' concessions at 2013-14 levels plus inflation and improve them where possible.

RECOMMENDATION 44: Develop a water consumption concession scheme for private rental tenants.

RECOMMENDATION 45: Introduce license and registration concessions for probationary and restricted licenses, and for low-income households of working age.

RECOMMENDATION 46: Expand promotion of the concessions program, including for those who do not access online information.

RECOMMENDATION 47: Undertake a cost-benefit analysis in relation to concessions — particularly looking at whether any reductions in concessions are likely to result in cost increases in other parts of the human services system, including health, education, justice, and community services.

RECOMMENDATION 48: Adopt a comprehensive financial assistance scheme for the ACT Alcohol Ignition Interlock Program that will introduce flexibility for individuals on low incomes. The financial assistance scheme should include, in addition to maintenance of the existing 35 percent concession, severe financial hardship assistance for those assessed as eligible. Such a scheme could be developed to be consistent with the approach of Infringement Notice Management Plans whereby individuals who are deemed eligible to participate may be able to repay the cost of their interlock device by instalments, by participation in a Work or Development Program (WDP), or potentially receive a waiver in extreme circumstances.

RECOMMENDATION 49: Ensure no additional charges are incurred for making use of payment plans rather than upfront complete payment of fees, fines and charges.

RECOMMENDATION 50: The ACT Government seek funds from the Commonwealth Government to share the costs associated with concessions given for registration of diplomatic vehicles.

Introduction

ACTCOSS welcomes the opportunity to provide a submission to the 2016-17 ACT Budget. This Budget comes at a time of economic uncertainty, locally and nationally, and in a context of growing inequality in Australia and around the world (ACOSS 2015: 8-9). Recent OECD (2014: 24-25) research demonstrates that income gaps widen in times of recession and they often fail to narrow when economic outlooks improve. While the ACT is not in recession, the government's budget consultation paper acknowledges that this is an economically challenging time and that growth and employment have slowed in the previous several years (ACT Government 2015a: 1).

In our submission we argue that now is the time to ensure that our policy settings are focused on the gap between the disadvantaged and the advantaged in our community and that this approach is necessary in order to prevent income inequality and social exclusion escalating in the ACT. The United Nations Sustainable Development Goals, that Australia has signed up to work towards from 2016-2030, include targets aimed at reducing inequality within developed economies. These goals provide an imperative to and guidance on investment, programs and initiatives that will improve outcomes for people whose housing, education, and broader economic and social indicators measure in the bottom 40 percent. These are the people whose opportunities and outcomes need to improve if we are to reduce inequality and increase social inclusion in our Territory.

Getting our social policy settings right is critical to realising the government's aim of growth and diversification of the ACT economy. It is important to recognise that from 1995-2010 the ACT economy delivered an overall increase in household wealth (ABS 2012b). However, in research undertaken by the ACT Government it is acknowledged 'that the ACT has one of the highest proportions of 'diverse' suburbs/collection districts (CDs), where diverse suburbs/CDs have high numbers of both the most and the least disadvantaged individuals living side by side' (ACT Community Services Directorate 2012: 3).

In other words, the overall positive story masks deprivation and vulnerability for people living on low incomes in the ACT. The unequal distribution of resources and opportunity in the ACT was, at least implicitly, recognised in early 2015 with the establishment of a social inclusion and equality portfolio in the ACT Cabinet. We argue that social inclusion and equality should be the core agenda guiding spending decisions in the 2016-17 ACT Budget.

If we grow and diversify our economy in a way that is equitable and sustainable we will be able to meet the other important goals identified in the budget consultation paper: enhancing liveability and social inclusion; suburban renewal and better transport; and ongoing health and education investment (ACT Government 2015a: 2). The converse is also true. If the ACT Budget for 2016-17 focuses on growth and diversification of the economy without paying attention to inequality of access to resources and opportunities we are likely to see a growing gap between individuals and households earning high incomes and those on average and below average incomes in the ACT. The latter are the growing number of people unable to enjoy the social or economic dividend

of economic growth, who are increasingly seeking assistance from financial assistance and advocacy services.

This submission outlines four priority areas of community need in the ACT: housing, education, transport, and critical gaps in our social safety net needing urgent attention. We outline a case as to why investing in these areas will address critical gaps in our service system and will promote financial stability, enable growth in human capital, improve social mobility, and extend opportunities for social and economic participation.

Community Need in the ACT

We welcome the Chief Minister's specific call for submissions which highlight need in our community in this year's budget consultation paper. As the peak representative body for not-for-profit community organisations, people living with disadvantage, and low-income citizens of the Territory, we have a unique insight into need in our community. Our ability to accurately predict community need was validated when the Socio-Economic Indexes for Individuals (SEIFI) was released by the Australian Bureau of Statistics (ABS) in 2006. This data shows that, despite common perceptions, the ACT is not immune from disadvantage and that where previously it was thought that only 712 people were in the most disadvantaged group, in fact, 28 639 of people aged between 15-64 in the Territory fall into this category (ACT Community Services Directorate 2012: 3). This number is far more consistent with the level of demand for services that our sector experiences and that had been highlighted in our research and advocacy.

In fact, the SEIFI data highlights that area-level analyses are prone to the 'ecological fallacy'—the name given to errors which arise when 'When we make judgments about individuals, based on the characteristics of the area in which they live' (Baker & Adhikari 2007: 1). An ABS research paper investigating this issue concluded that:

...using an area level indicator of socio-economic disadvantage will not be a good proxy for the socio-economic status of many of the individuals and families living within that area. Because of this, analyses which use SEIFA [Socio-Economic Indexes for Areas] indexes such as the IRSD [Indexes of Relative Socio-economic Disadvantage] as a proxy for family and individual socio-economic status will be at high risk of an ecological fallacy (Baker & Adhikari 2007: 24)

The discrepancy between the SEIFA data and the SEIFI data also highlights an enduring issue in Canberra. We do not have areas in which disadvantage is highly visible, which means that high levels of advantage conceal the reality of disadvantage that does exist in Canberra. Or, in other words, we are highly prone to making the ecological fallacy. An ACT Government report states that:

The SEIFI data has shown that the ACT has one of the highest proportions of 'diverse' suburbs/collection districts (CDs), where diverse suburbs/CDs have high numbers of both the most and the least disadvantaged individuals living side by side. This is highly unique to the ACT and, as a result, the averaging effects of SEIFA chronically under-reports disadvantage (ACT Community Services Directorate 2012: 3).

What is more, the ACT Community Services Directorate (CSD) (2012: 3), using SEIFI data, estimated that we could have 40 400 ACT residents who fall into the category of most disadvantaged. In a city with a population of less than 400 000 people this is a significant number of people to be classified as most disadvantaged, being more than 10 percent of the population.

Despite the fact of real and significant disadvantage in the ACT, too frequently our policy settings appear to be informed solely by the high averages achieved in the ACT—whether these are high average incomes, relatively good health

status or high average student attainment. ACTCOSS believes that we must do more to ensure that our policy settings are not determined by averages but are instead sensitive to underlying evidence of patterns of distribution of resources and opportunities.

The trial SEIFI measure was drawn from the ABS 2006 Census data and demonstrated that area level analysis significantly underestimates disadvantage in the ACT (ACT CMTEDD n.d.). While the existing data is useful it is also now becoming dated. In order to accurately understand need, and to design a responsive social service system in the ACT we need a reliable predictor of socio-economic disadvantage. The SEIFI is the most accurate measure.

Brief recommendation for the 2016-17 ACT Budget

RECOMMENDATION 1: Fund a Socio-Economic Index for Individuals (SEIFI) data set drawn from the 2011 ABS Census.

The broader facts on community need in the ACT are:

- **Real and persistent disadvantage** is experienced in the ACT. In 2011 there were:
 - 21 528 people living in poverty
 - 9 910 households experiencing housing stress
 - 14 148 people experiencing financial stress
 - 1785 experiencing homelessness
 - 28 639 disadvantaged people according to the ABS SEIFI Index in the ACT.

Many of these will be the same people with a number of people experiencing multiple disadvantage (for example, in poverty and homeless; or in poverty, in financial stress, and in housing stress) (Tanton, Vidyattam & Mohanty 2013: iii).

- Our **high average incomes are not shared by all, but high housing costs are**. As we discuss in detail below, in the ACT we have one of the most expensive rental markets in Australia (Tanton, Vidyattam & Mohanty 2013: 2-3).
- **High housing costs impact disproportionately on people on low incomes**. Sector-funded research on housing costs in the ACT highlights the significant pressures that high rental costs put on people on low incomes, including those on Commonwealth income payments. It finds that:

...lower income households in the ACT actually spend a greater proportion of their income on housing than well off households (fourth and highest

quintiles). In fact, households in the second and third deciles of equivalised household income (24%) spend more than double the rate of households in the highest quintile (11%) (ACTCOSS & ACT Shelter 2015: 8).

- As at September 2015:
 - 2147 people were on the social housing waiting list (which includes public housing, community housing and affordable housing) (ACT Government 2015b). Of the people waiting, 85 applicants were categorised as having 'priority' housing needs and 1280 were categorised as having 'high needs' housing. A minority of total applicants, 782 were categorised as waiting for standard housing.
 - Average wait times were 253 days for priority housing; 787 days for high needs housing; and 823 days for standard housing (ACT Government 2015b).
- At the time of the 2011 Census **the ACT had the second highest homelessness rate in the country** (ABS 2012a: 8). As highlighted in Table 1, the ACT was one of few regions in which homelessness had actually worsened in the period since the 2006 census (ABS 2012: 8).
- ACT homelessness services continue to report need far exceeding supply (see Figures 1 & 2).
- While we rank well in **student performance** in the ACT at the aggregate level, research suggests educational attainment is impacted by socio-economic position. In 2010 the ACT Government, through the Standing Committee on Education, Training and Youth Affairs, undertook an inquiry into the education achievement gap in the ACT. The report produced at the conclusion of the inquiry includes research undertaken in consultation with the ACT Department of Education exploring whether socio-economic disadvantage had an impact on schooling outcomes. The research highlighted that:

...the results in kindergarten are predictors of the results in year 5, and the results in kindergarten are negatively affected by low socioeconomic status. So there is a correlation between the low kindergarten results and low socioeconomic status, and those results do not pick up by year 5 (cited in Standing Committee on Education, Training and Youth Affairs 2010: 9).
- Available data suggests that, for a number of people in the ACT, **affordable, appropriate primary health care is difficult to access**. In 2013-14, seven percent of adults delayed or did not see a GP due to associated cost (NHPA 2013: 18). In 2011-12, 22 percent of adults delayed or did not see a dentist or dental hygienist due to associated cost, while 12 percent delayed or did not see a specialist due to cost (NHPA 2013: 18). In 2013-14, seven percent of people delayed or avoided filling a prescription due to cost in the preceding 12 months (NHPA 2015)—an improvement on the 2011-12 statistic of 12 percent (NHPA 2013: 8). While showing an improvement, the ACT has a comparatively high number of people not accessing health care due to costs. This figure was between two and nine percent of the adult population across the primary health network districts in 2013-14 (NHPA 2015).

In the 2011-12 period, the ACT had a lower rate of bulk-billing than in other Medicare Local catchment areas (NHPA 2013: 20). In the ACT only 50 percent of GP attendances were bulk-billed. This is the lowest rate of all Medicare Local catchment areas (NHPA 2013: 20). The next lowest are Southern NSW at 64 percent, Fremantle at 66 percent, and Hume (Vic/NSW) at 67 percent. By contrast, in Western Sydney 96 percent of GP attendances were bulk-billed and in South Western Melbourne 90 percent of attendances were bulk-billed (NHPA 2013: 20).

- While total 'offender' numbers were comparatively low in the ACT as at 30 June 2014 (latest published data on ABS website), **of all states and territories the ACT had the highest proportion of prisoners with prior imprisonment** (77% or 300 prisoners) (ABS 2014).
- At 30 June 2014, Aboriginal and Torres Strait Islanders comprised 16 percent (63 prisoners) of the adult prisoner population. The Aboriginal and Torres Strait Islander age-standardised imprisonment rate was 12 times the non-Aboriginal and/or Torres Strait Islander age-standardised imprisonment rate. This amounts to 1219.7 prisoners per 100 000 Aboriginal and Torres Strait Islander adult population compared to 104.2 prisoners per 100 000 adult non-Indigenous population (ABS 2014).
- **Aboriginal children are over-represented in the out-of-home care system.** According to a recent Child Family Community Australia (CFCA) Fact Sheet:

Australian Bureau of Statistics population projection data for 30 June 2014 indicates that Aboriginal and Torres Strait Islander children would comprise 5.5% of all children aged 0-17 years in Australia (AIHW, 2015); yet in 2013-14 they constituted nearly 35% of all children placed in out-of-home care. In all jurisdictions, the proportion of Aboriginal and Torres Strait Islander children on placement orders was higher than that for other children (CFCA 2015).

These facts highlight and substantiate our argument that investment is needed to address the needs of people living with multiple risk factors and stuck in the bottom 40 percent group for attainment of housing, education and broader economic and social outcomes. Given these facts, policy settings in the ACT must be designed to acknowledge that real and significant disadvantage is located side by side with wealth and advantage. One practical way to do this is to stop judging the performance of the ACT simply against the national average and, instead, to start judging our performance in terms of improvements for people who have below average housing, education and health, and by improvements in income, gender and racial equality.

Taking this approach would enable the ACT Government to align its economic agenda with its social inclusion and equality agenda. It would also position the ACT well to report on progress towards the United Nations Sustainable Development Goals that will commence from 1 January 2016.

In this submission we outline areas of community need under four broad headings covering long-term issues and critical gaps: (1) accessible and affordable rental housing and homelessness; (2) educational outcomes; (3)

transport as a social determinant of health; and (4) critical gaps in our social safety net needing urgent attention.

While we set out our submission in this way for ease of reading, these four areas of need should not be understood as discrete from each other or as constituting a hierarchy of needs. Instead, what is fundamentally important about addressing these areas is how they intersect in the lives of real people – providing opportunities and protections where they exist and reducing exposure to risk of significant social and economic exclusion. Recognising these issues and areas as intersecting means recognising that disadvantage cannot only be conceptualised as requiring interventions *post* a period of crisis. The best way to protect people from social and economic exclusion is to:

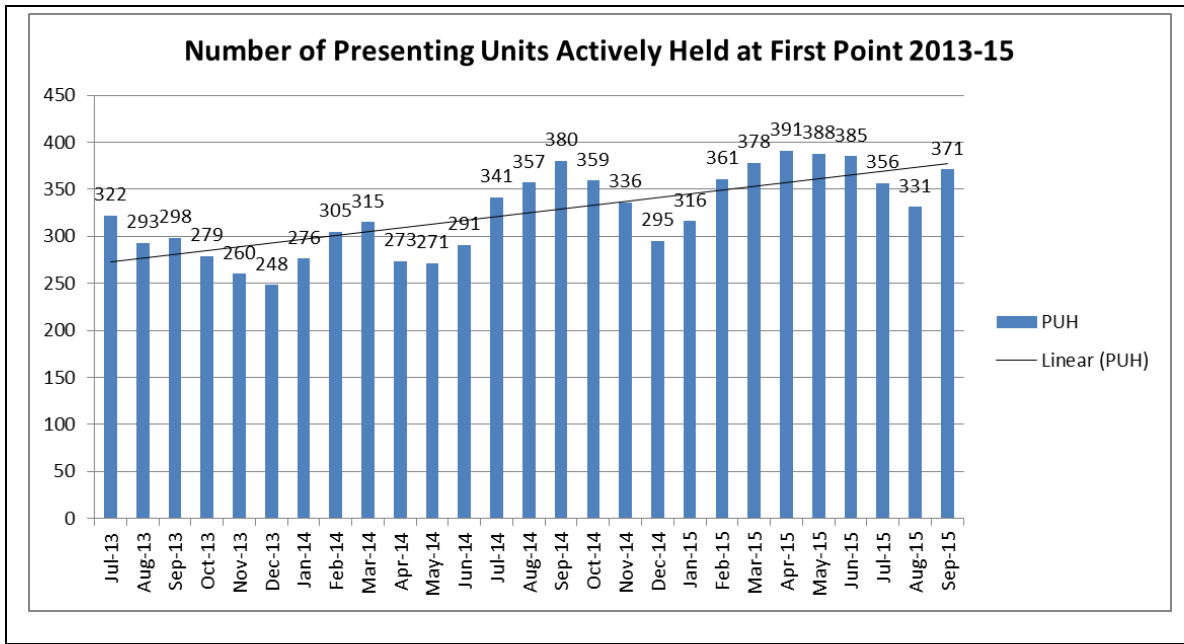
- Design our institutions and our economy in ways that promote inclusive and sustainable growth; and
- Give all people fair and adequate access to the protective factors of affordable, accessible and safe housing, adequate education, and affordable, accessible and fit-for-purpose transport.

Table 1. Rate of homeless persons per 10 000 of the population, by State and Territory of usual residence—2001, 2006 and 2011

States and Territories	2001	2006	2011
New South Wales	36.4	33.9	40.8
Victoria	38.9	35.3	42.6
Queensland	54.8	48.3	45.8
South Australia	39.8	37.0	37.5
Western Australia	53.6	42.3	42.8
Tasmania	27.5	24.0	31.9
Northern Territory	904.4	791.7	730.7
Australian Capital Territory	30.4	29.3	50.0
Australia	50.8	45.2	48.9

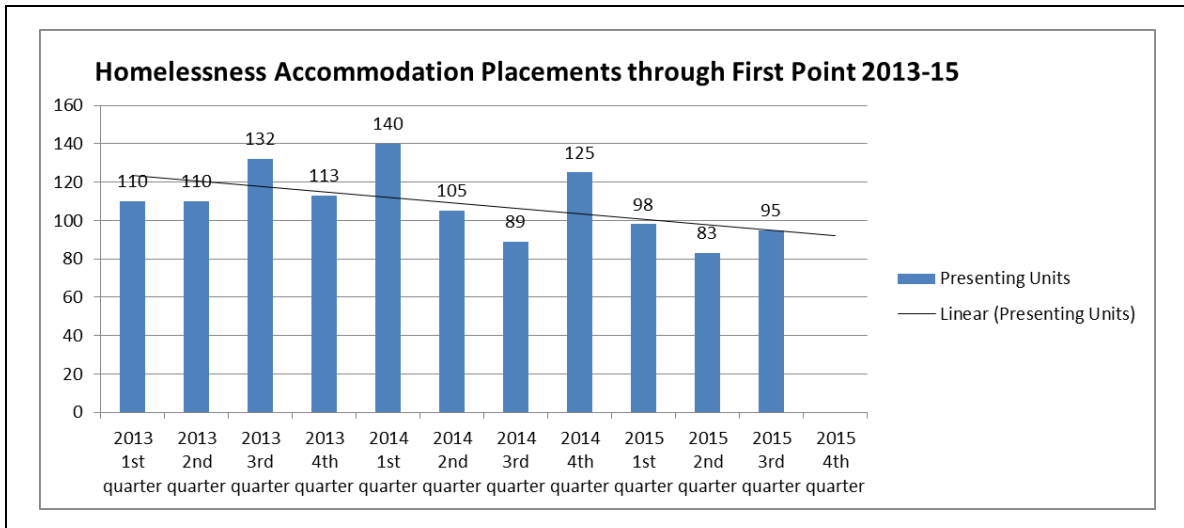
Source: Reproduction of data in Table 1.2 (ABS 2012a: 8)

Figure 1. Presenting units seeking accommodation services, 2013-15



Source: First Point

Figure 2. Presenting units placed into accommodation, 2013-15



Source: First Point

Social Protections Need to Address Intersecting Social Needs

Secure housing impacts education outcomes

Students who do not have secure housing are unlikely to perform to their best abilities at school. A review of AHURI research undertaken by Jeanette Lewis found a positive relationship between security of tenure and family cohesion which in turn impacts on education outcomes.

The main mechanism by which security of tenure impacts positively on family stability is through reduction in residential mobility and increased residential stability. Residential stability enables people to feel more in control, settled, less stressed, and gives people the 'mental room' to focus on longer term goals such as family relationships and children's education.

High levels of residential mobility are associated with poor educational performance and reduced completion of high school.

Private renters, especially those on low incomes, experience high levels of mobility resulting in frequent changes of schools for children.

In a study of public housing entrants in Melbourne and Brisbane, 36% of the children had attended one school in the previous two years, 28% had attended two to four schools and 16% had attended five or more schools over the previous two years. High levels of child and parental stress can be expected with such disrupted living arrangements.

Security of tenure improves a household's child rearing capacity. Public housing tenants report that as a result of their public housing they are: '...feeling...more settled' (76.8%), and 'children [are] feeling more settled' (62.1%). These improvements in children's education outcomes can come about in relatively short periods of time as a result of stabilised housing (Lewis 2006: 3).

Educational attainment protects against unemployment

While the relationship between public housing and employment outcomes is unclear, evidence suggests that strong educational attainment is itself a protective factor which helps people to find and keep secure employment. ABS data demonstrates that there is a positive relationship between educational attainment and labour market outcomes (Perry 2014: 16). This data showed that, in the ACT, people aged 25-34 who had not completed Year 12 had an 8.4 percent unemployment rate and the lowest employment participation rate of 72.1 percent. Those with a Certificate I/II as their highest level of education had a 13.7 percent unemployment rate and an 80 percent participation rate. Those with a Bachelor Degree had a 2.2 percent unemployment rate and 90.9 percent participation rate. Those with a Certificate III/IV also had a low unemployment rate at 2.1 percent and the highest participation rate of 92 percent.

Structural factors matter

Though they are important, in an expensive and highly competitive housing market, strong educational attainment and good community supports will only go so far. Where rents are high, not only is maintaining housing a challenge but

saving towards home ownership is ruled out as a possibility for many. Home ownership is important not only in creating secure housing but as a means of wealth generation and, in turn, a protective factor against risks like homelessness in older age (Petersen et al. 2014: 25).

A 2014 research project investigating homelessness pathways for older people that drew from existing and new empirical data from five Australian states and 31 different agencies found that:

Of the older people with a conventional housing history, 56 per cent were at risk of homelessness due to inaccessible rental accommodation. The findings are a reflection on the difficulties faced by older people seeking affordable, accessible housing in the private rental market. This was found to be an issue in both urban and rural areas (Petersen et al. 2014: 94).

The study also concluded that:

There has been a longstanding recognition of the adverse circumstances of older renters in Australia (Kendig 1981; Kendig 1984; Howe 2003; Russell, Hill & Bassar 1998). Key to this body of research is the link to an accumulation of disadvantage through the life cycle by not attaining home ownership and remaining in the private rental market. Indeed, Howe (2003, p.16) describes this as the great divide in the housing situation of older Australians: those who have achieved home ownership and those who rent.

An inability to secure home ownership in Australia places older people reliant on the Age Pension vulnerable to the insecurities of the private rental market (Petersen et al. 2014: 25, in-text citations in original).

Housing is also about location, amenity and connection

Furthermore, housing matters not just in terms of access to a secure home base, but also in terms of location and access to social amenities. This is particularly the case for older people (Petersen et al. 2014: 3) and for people who do not or cannot drive. Transport costs are a key cost of living pressure for women with disabilities in the ACT as was recently established in research undertaken with women living with disability in the ACT by Women With Disabilities ACT (WWDACT):

Transport was identified as a significant contributor to poverty. Taxis [sic] travel accounted for a large proportion of transport costs. For participants who were dependent on this form of transport due to their disability and/or their health care needs (Gough 2015: 44).

Addressing gender and racial inequality will reduce vulnerability and improve outcomes

There are some people whose vulnerability and need for services is driven by social norms and beliefs that exacerbate deprivation and exclusion. For example:

- Women are more likely to be living with domestic violence and to have inadequate and insecure income.
- Aboriginal and/or Torres Strait Islander peoples have worse health and education status and face specific barriers to accessing opportunities and

resources that are related to the history of dispossession, the Stolen Generations, and past and current discrimination.

- People from culturally diverse backgrounds face specific barriers to accessing opportunities and resources that are related to language and literacy issues, restrictions imposed by visa conditions, and past and current discrimination.

Strengthening revenue bases to provide for the future

In the context of the current economic outlook, our community needs a clear and transparent plan for how key essential public infrastructure and community services will be delivered into the future. This plan needs to include:

- A consistent and coordinated advocacy strategy to reverse reductions in Federal Government investment in essential services, especially health, education and community services;
- Adequate revenue measures for funding and growing services as the population grows;
- Reorientation of investment to prevention and early intervention to reduce long-term growth in the need for crisis and tertiary-level services;
- Transparency regarding any cuts or savings;
- A rationale for both revenue measures and savings measures that the community can understand.

ACTCOSS does not oppose the principle of fee-for-service where such measures are appropriate and do not reduce access for people in the bottom 40 percent – the lowest two income quintiles. But we are concerned that high average incomes can obfuscate the negative impacts of flat tax measures. Even where such tax measures may be perceived as efficient, the extent to which they may contribute to households struggling with cost of living pressures must be taken into account.

Flat tax and fee charging measures are sometimes introduced alongside concessions for people on low incomes, intended to offset the impact of the new or increased tax burden for people on low incomes. Concessions are expensive for government and are, therefore, tightly targeted. In practice this can mean that concessions are of limited efficacy in cushioning the impacts of cost of living pressures for people in low wage jobs or in jobs with not enough hours to cover the relatively high costs of living in Canberra. People in these circumstances often do not qualify for concessions despite being financially vulnerable (ACT Government 2012).

Recent research on the impacts of housing costs by the ACT Housing Consortium found that people in the lowest income quintiles paid 37 percent of their incomes on housing costs. People on incomes between \$40 000–\$69 000

paid an average of 36 percent of their incomes on housing costs.¹ There is only a very slight difference in proportion of income between these income groups. However, fewer of the people in the \$40 000-\$69 000 income group are likely to be eligible for housing-related concessions such as being eligible for public housing or Commonwealth Rent Assistance because of their higher incomes.

Increases in the rate and timeframes for charging parking fees impact disproportionately on low-wage workers in the retail and hospitality sectors, especially those working in town centres. These workers, despite being in a low-wage industry and often with no guarantee of the number of hours they would work each fortnight, have limited capacity to absorb increased parking fees without displacing spending on other essential items. Concession schemes do not cover these at risk groups.

These examples highlight the fact that tightly targeted concessions are not always effective in meeting across-the-board cost of living pressures.

¹ This unpublished research is currently with the Community Services Directorate awaiting approval for public release.

Affordable and accessible rental housing — a community need in the ACT

As was noted above, the ACT has one of the most expensive rental markets in Australia (Tanton, Vidyattam & Mohanty 2013: 2-3). The problem with this is not only that rents are high, but that paying them puts significant pressure on low-income households. A report by the Grattan Institute found that in '2009-2010, 67 per cent of capital city renters in the bottom two income quintiles paid more than 30 per cent of their gross income in rent, and 31 per cent paid more than half their gross income in rent' (Kelly et al. 2013: 19).

More recently, the 2015 Anglicare Australia *Rental Affordability Snapshot*, which provides a snapshot analysis of rental affordability by looking at listed rentals on a randomly chosen weekend in April, found that in the ACT and Queanbeyan:

Aside from a small number of dwellings affordable to Aged Pensioner households, there were only two appropriate housing options affordable to any household which derived its income from a Centrelink benefit. Of particular concern was the lack of affordable rental options for young people on Youth Allowance, Newstart Allowance recipients, Disability Support Pension recipients, or Parenting Payment (single) recipients.

Young people had no affordable options in this market, the closest being a single shared accommodation option which specified that it was a lounge room. Even this property could not be rented affordably on a Youth Allowance (including Rent Assistance) income, although the slightly higher Newstart Allowance was sufficient to rent this rather unusual option.

Single parents similarly lacked affordable options in this market; while they had a slightly larger budget, the requirement for more than one bedroom meant that nothing affordable was an appropriate setting in which the children could grow with privacy and independence. Low-income single parents negotiating custody arrangements would find this choice between affordability and appropriateness of their dwelling a further disadvantage.

Those which were affordable to single aged pensioners were all rooms in shared houses, which in many cases would not be appropriate for the older person, and similarly would not be an arrangement of choice for the other housemates. Couples on the Age Pension fared slightly better although nearly all of their 57 affordable and appropriate rental options were located in Queanbeyan (Anglicare Australia 2015: 42).

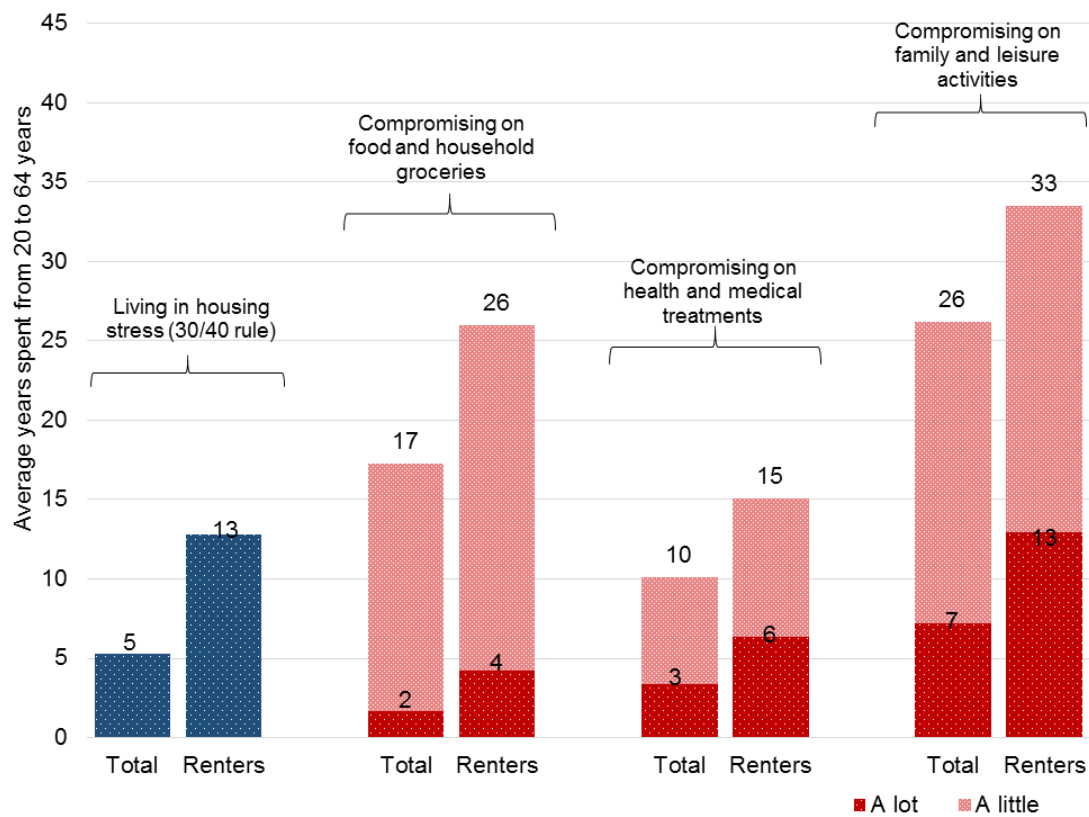
Nor is it the case that rental costs are only unaffordable for people on meagre Commonwealth income payments. Workers on lower wages are also struggling to keep up with high rents in the ACT. Recent research undertaken by the ACT Housing Policy Consortium, comprised of ACT Shelter, ACTCOSS, the Women's Centre for Health Matters, and Youth Coalition of the ACT found that people on low incomes are increasingly facing pressures to sacrifice other essential items in order to manage their housing costs (ACT Shelter et al. 2015).²

² This unpublished research is currently with the Community Services Directorate awaiting approval for public release.

The research also found that:

Household compromises are most prevalent among renting households. Of all renting households, 15% compromised a lot on groceries, 14% compromised a lot on health and 36% compromised a lot on family and leisure activities in the last 12 months due to financial pressures. This largely reflects the fact that renting households are more likely to be lower income households than households which own or are purchasing their home. However, for many renting and mortgagee households, differences between weekly rent and mortgage costs are small. The restricted supply of social housing and the relatively high costs in the private rental market therefore lead to high levels of housing stress and compromise without any necessary financial or wealth benefit in the short or long run (ACT Shelter et al. 2015).

Figure 3. Average years spent in housing stress, ACT, males



Source: ACT Shelter et al. (2015)

While the affordable rental market is competitive for all, people living with disability face even more significant challenges in gaining affordable housing as much of the existing stock is not accessible to people with disability. Our existing tenancy laws also make it very difficult for people to make even simple modifications to their home when it is a rental property, like installing hand rails in the bathroom. Furthermore, as was highlighted in the discussion above, accessible housing for people living with disability is not only a question of design. It is also a question of location. Having good access to local amenities and/or to public transport is vital in managing the costs of living for people with disability as research by WWDACT clearly establishes (Gough 2015: 41, 44).

Increasing accessible, affordable rental housing is a clear community need in the ACT.

A consequence of the current lack of accessible, affordable rental housing is increased demand for homelessness services. At the time of the 2011 Census the ACT had the second highest homelessness rate in the country (ABS 2012: 8). The ACT was one of few regions in which homelessness had actually worsened in the period since the 2006 census (ABS 2012). Homelessness services continue to report need far exceeding demand as shown in the First Point data in Figures 2 and 3 above.

Much of the funding for homelessness services comes from the Commonwealth, through grants or partnership initiatives. There is, therefore, a very real concern about the future capacity of services to meet current demand, let alone any growth in demand, in the context of Commonwealth funding cuts. If this revenue is cut by the Commonwealth, then searching for additional savings measures in the ACT Budget will not be adequate to address these funding shortfalls. The ACT Government needs to articulate how it will raise the revenue to fund these needed services if Commonwealth funding is cut.

Continued funding for homelessness accommodation and support services to enable them to meet demand is a clear community need in the ACT.

There will always be a need to provide crisis housing services. However, in the ACT these services are being used as a safety net, albeit one that is not able to catch the large number of people whose housing needs are not met in the private or public housing market. The demand and waiting list for public housing is described in detail above. Evidence such as that provided by the Anglicare Rental Affordability Snapshot, cited above, demonstrates that the ACT private rental market is not meeting the needs of people on low incomes. ACTCOSS's own research on housing costs in the ACT highlights the significant pressures that high rental costs put on people on low incomes. Our research found that we are behind the national average when it comes to the proportion of rental stock affordable for an individual on the minimum wage, though the rate is higher here than in Melbourne and Sydney (ACTCOSS & ACT Shelter 2015: 9). It is also the case that:

Rent prices are outstripping the generic inflation rate for Canberra (ACT), with rent prices, on average, having increased at a rate 66% higher than that for the generic CPI for the ACT. This is despite the fact that the last six quarters have seen no increase in rent prices (ACTCOSS & ACT Shelter 2015: 6).

This research suggests that the ACT private rental market is not performing adequately to meet the needs of people in the ACT who are living on low incomes and dealing with significant financial hardship. The existing evidence finds that one of the key challenges in the Specialist Homelessness Sector (SHS) is having appropriate rental housing for people to transition into.

A recent evaluation of the SHS reports:

Over the reform period [2009-2014] the SHS system has experienced greater demand from service users with higher needs accessing the system

in less stable housing situations. The SHS sector has provided more services, particularly non-accommodation supports, and has achieved better non-housing related outcomes for service users, especially in employment. However, while the ACT still has a much higher rate of exits into social housing than in other jurisdictions, exits into stable accommodation have declined over the period. ...Integration has improved across all service types, but gaps remain—a core challenge remains the availability of social housing and private rental accommodation for people moving out of the SHS sector, with implications for the development of products and services designed to help people rent in the private rental market (ARTD 2015: 12).

What is more, while it is the case that homelessness can happen to anybody, research shows that homelessness is more likely to happen to people who have had interactions with the human services system. People who have experienced domestic violence³ and/or who have had interactions with the out-of-home care system,⁴ the mental health system,⁵ or the justice system⁶ are found to be over-represented in homeless populations. So too are Aboriginal and/or Torres Strait Islander people (ABS 2012) who are similarly over-represented in other areas of the human services system like out-of-home care (CFCA 2015) and justice (ABS 2014). In each and all of these instances, not having policy settings in place that take into account people's housing needs and how particular situations and/or personal crisis—in the short term and the long term—can leave people exposed to housing insecurity are contributing to increasing rates of homelessness.

The government's significant investment in the out-of-home care system in the 2015-16 Budget is an implicit acknowledgement of how policy settings in out-of-home care can be improved to reduce longer-term risks of social and economic exclusion and lifelong need for community services, including reducing the high rates of homelessness for young people leaving out-of-home care. While this investment is welcome, there is a need to establish a whole-of-government approach to understanding and addressing homelessness in the ACT. A whole-of-government approach means recognising the interconnections in government policies and in people's lives that serve to either expose them to or protect them from risks such as homelessness. By interconnections we mean, for example, being a young person who transitions from the out-of-home care system without a proper plan for how to manage being ineligible for out-of-home care

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- 3 The 'Journey's Home' Report, which documents the findings of a longitudinal survey of people with high levels of housing insecurity, for example, found that: 'homelessness and recent experiences of either physical or sexual violence often go hand in hand. This is particularly true of primary homelessness' (Bevitt et al. 2015: 26).
 - 4 The CREATE Foundation 2009 survey of young people transitioning from out-of-home care found, for example, that 'over one-third [of survey respondents] had at least one experience of homelessness in their first year of independence [from care]' (McDowall 2009: 6).
 - 5 To the best of our knowledge there is no data kept in Australia that systematically records the number of people experiencing homelessness who have a mental illness. However, available data demonstrates a strong correlation (for an overview of the research see MHCA 2009: 14-15). This data includes a survey of people living with mental illness by SANE that 'found that 94 per cent of respondents had been homeless or were without suitable accommodation at some point in their lives' (as reported in MHCA 2009: 14).
 - 6 The 'Journeys Home' Report, for example, found that survey '[r]espondents that have ever been incarcerated, whether in juvenile detention, adult prison, or remand are particularly prone to homelessness, even when comparing to similarly vulnerable people' (Bevitt et al. 2015: 3).

resources. Or being a person living with mental health issues who is released from a mental health facility without having secure accommodation in place.

Additionally, the existing homelessness service system may not respond equally well to the needs of all people who experience homelessness. National research demonstrates that people of diverse genders and sexualities or who identify as lesbian, gay, bisexual, transgender, queer, questioning or intersex, are not well served by the existing homelessness service system and may experience heightened safety risks within the service system (Oakley & Bletsas 2013).

Because a wide range of government policies impact on people's risk of homelessness, housing and homelessness must be treated as whole-of-government responsibilities.

Below we outline proposals that would help address community needs for accessible and affordable housing and for adequate homelessness support services.

Continue to provide funding for specialist housing/accommodation and support services to enable them to meet demand

As long as people need accommodation and/or support services we must provide them at an adequate level and to an adequate standard. An evaluation report commissioned by the ACT Government and published in 2015 showed that demand for specialist homelessness services is growing in a context where funding, as a consequence of recent Commonwealth cuts, is decreasing (ARTD 2015: 9).

The report included analysis of the most critical gaps in access to services:

Gaps are also evident for certain service user groups who are less likely to be able to access support services, less likely to have their needs met, or less likely to have stable housing on exit. The following groups were reported by services to be less likely to be able to access SHS accommodation supports due to a mismatch between their needs and eligibility for specific service providers: women with children not subject to domestic violence—particularly women with adolescent male dependants; couples over 25; young people under 15 years of age; refugees; and people with pets.

A statistical analysis of gaps was conducted using logistic regression of SHSC support period and client data. We considered service users who were most likely to have an unmet need for accommodation, or exit from the SHS sector into unstable housing situations, as evidence for gaps in service delivery. On this analysis, and taking into account demographics and circumstances it was found that young people were more likely to have an unmet need for accommodation and more likely to exit into unstable accommodation. The analysis also found that women were more likely to have an unmet need for accommodation, but less likely to exit an

accommodation support into unstable housing. While those with poor accommodation situations on entry were more likely to have their housing needs met, they were nine times more likely to experience an exit into unstable accommodation than other clients (ARTD 2015: 12).

Brief recommendation for the 2016-17 ACT Budget

RECOMMENDATION 2: Sustain funding to Commonwealth/ACT joint funded programs under the National Partnership Agreement on Homelessness, even if the Commonwealth withdraws funding AND Improve access to emergency housing.

ACTCOSS acknowledges that the Specialist Housing Services are being consulted by the ACT funding body on the priorities for and design of services within the current funding envelope. The recommendations below are focused on those services that have a role in reducing demand in the crisis housing system by sustaining and increasing tenure in longer-term housing.

Detailed recommendation for the 2016-17 ACT Budget

Housing-related legal services

DETAILED RECOMMENDATION 1: Sustain funding for existing housing-related legal services and increase access to tenancy advice/advocacy/legal assistance and links with support that can address individual risk factors for tenants/owners at risk of losing their housing by maintaining existing legal services and providing ongoing funding for the Street Law program.

Program: Street Law, legal outreach services for people who are homeless or at risk of homelessness

Total Cost: \$340 000 indexed annually – ongoing funding

Efficiencies: Savings are achieved from the existing operational model through co-location; joint purchasing arrangements; combined payroll function with Legal Aid; and other back-end efficiencies. The program also attracted approximately \$370 000 worth of commercially costed pro-bono hours in 2014.

What services currently exist in this space?

The Tenant's Union and Canberra Community Law (CCL) (which includes Street Law) are the two organisations in Canberra—which are non-government, not-for-profit—that provide legal advice and assistance to people who are homeless or at risk of homelessness.

The Tenant's Union typically services private community housing tenants and occupants. They do not apply means-tested eligibility criteria to their advice work but do means test their casework services.

CCL typically services public and community housing tenants. CCL applies means test criteria to determine service eligibility.

Street Law is a program of CCL and operates a unique service model in that it operates as an outreach service which then also functions as a gateway to the legal services offered by Tenant's Union and other CCL services. It supplements the services that the other legal services provide. Funding criteria for the services ensures that there is no duplication of services offered.

However, CCL faces significant funding uncertainty as its funding is being delivered through the National Partnership Agreement on Legal Assistance Services. Under this agreement there will be a 34 percent decrease in funding provided to community legal services covered by the agreement from 2017-18. These cuts will impact on Street Law and the other CCL legal services. In this submission we highlight the need to maintain Street Law, which has been a new and unique program addressing a need not addressed by existing services. We want to see a commitment to ongoing funding for Street Law. We are asking for an ongoing commitment of \$340 000 (indexed) annually. This would cover 3.6 full time equivalent (FTE) staff to respond to homeless people in crisis and also contribute to community sector education about the importance of recognising and responding to client's legal problems.

Why do homeless people need legal services?

People who are homeless often have legal problems and their ability to resolve these problems will have a significant impact on their ability to secure and maintain housing. Research by the Law and Justice Research Foundation reported that 85 percent of people who are homeless had one legal problem in the past 12 months; 50 percent of people who are homeless had three legal problems in the last 12 months (Coumarelos & People 2013: 2-3).

What kinds of legal needs do people experiencing or at risk of homelessness have?

People experiencing homelessness face a wide variety of legal issues. The problems faced by any particular individual may be connected to the drivers of their homelessness. For example, someone who has a substance dependence issue may have legal issues relating to debts, public space offences or minor property crimes. For those whose homelessness is caused by domestic violence, their legal issues may involve family law issues including divorce, division of property, and care of children. They may also experience a number of civil law problems including debts arising from financial abuse experienced in the context of their violent relationship. For women who have left the home with short notice they may also have issues connected to a lack of access to identity and other documents which were left behind in the family home.

Best service model: crisis response or early intervention?

As a sector we frequently think of social need as it impacts on an individual across a life-cycle or in terms of stages of a difficult experience. Because of this we often advocate to government to respond to community need at the early stage: to invest in early interventions. While ACTCOSS continues to advocate the need to make greater investment in early intervention, we also acknowledge that the nature of some crises means that early intervention strategies are either

not appropriate or not adequate. Legal advice and assistance to people experiencing or at risk of homelessness is one example where intervention at the time of crisis—that is, the risk of homelessness—is vital.

Research by the Law and Justice Foundation of NSW demonstrates that it is common for people (particularly those experiencing disadvantage) to ignore legal problems (McDonald & People 2014: 2). Reasons for inaction include lack of knowledge about legal rights, lack of awareness of legal advice services, beliefs that the justice system is too inaccessible or too costly, as well as a lack of psychological preparedness to act (McDonald & People 2014: 2). These factors mean that people usually only seek help at the crisis stage. The implications of not having support during crisis stages are, therefore, potentially devastating for an individual's future housing stability.

Additionally, in some cases, people may not know that they have legal problems until they are at the crisis stage. For example, a woman leaving an abusive relationship where she was denied any information of her financial situation may not know that she has significant unmet debts in her name until she attempts to leave the relationship. Having access to legal services at this point is vital to her safety and future housing stability.

The Street Law model is designed to assist people at crisis point, but also to provide early interventions where possible. The outreach model it utilises addresses some of the reasons for inaction in relation to legal problems by promoting increased awareness of legal problems in the community and by acting as a gateway to the free legal services in the ACT community. Outreach helps to educate support workers to recognise when clients have a legal problem and assists them to make early referrals. This helps to avoid negative legal outcomes.

Detailed recommendation for the 2016-17 ACT Budget

Tenancy support and advocacy services

DETAILED RECOMMENDATION 2: Sustain secure funding for existing housing-related legal services and increase access to tenancy advice/advocacy/legal assistance and links with support that can address individual risk factors for tenants/owners at risk of losing their housing by maintaining existing legal services and providing ongoing funding for the Supportive Tenancy Service.

Program: Supportive Tenancy Service, tenancy support and advocacy services for people who are at risk of homelessness

Total Cost: \$869 829 indexed, ongoing. This would continue the current level of funding (\$729 829) and in addition fund two FTE positions to work with clients with severe mental illness.

What services currently exist in this space?

The Supportive Tenancy Service (STS) is the only service in the ACT that provides an early intervention and prevention service to support community

members and prevent homelessness by supporting people to maintain their tenancies. The service has been funded for the last five years to provide early intervention and prevention services. As well as supporting people to retain their tenancies the STS has also assisted community members to establish tenancies.

STS works collaboratively with people to co-design a service response that meets their individual needs. Many of the STS users have multiple and complex needs that significantly contribute to their tenancies being at risk, including: severe and enduring mental illness; domestic violence; financial stress; substance dependence; and/or hoarding and squalor.

STS is located within the One Human Services Gateway, where STS tenancy support workers are rostered on to respond to enquiries: provide information, link to other services, or connect to an STS worker. STS works very closely with Housing ACT; First Point; the Child, Youth and Family Gateway; financial and legal services; and other community sector support services. Following the principles of the ACT Human Services Blueprint, STS looks at the network of support around a person or family and what are the best services to respond to their needs and goals.

STS has 4.4 FTE workers providing tenancy support, and 1.6 FTE workers providing tenancy options support. These workers cover all of the ACT, with workers based at Lanyon, Woden, Civic and Belconnen. All workers spend time at the Housing ACT Central Access Point in Belconnen, with support workers rostered to be part of the STS presence in the One Human Services Gateway. In 2014-15, STS workers assisted 800 people.

Why are tenancy support and advocacy services needed?

The importance, and effectiveness, of tenancy support and early intervention is recognised in the discussion paper prepared by the ACT Community Services Directorate on the ACT Specialist Homelessness Service Sector 'The Road Ahead', which notes, in particular, the role of tenancy support in preventing homelessness (ACT Community Services Directorate 2015: 12-13).

While there are some case management services that support vulnerable and at risk community members where housing is only one element of their needs, there are no other services that provide specialised housing support to people with complex needs in the ACT. STS is often the initial point of contact when people are worried about becoming homeless. STS workers can both address the issues and connect them into other services if needed. The experience of STS has shown that support can make a difference in sustaining a tenancy and preventing homelessness.

In 2014, STS expanded their focus on assisting people to establish a tenancy, responding to a gap in services. While many support agencies assisted people to secure public housing, a different approach is needed to access the private rental market. STS tenancy options workers have a broad knowledge of the range of tenancy options available and strong links with community and affordable housing providers. While there are still difficulties around the affordability of private rental in Canberra, assisting those who can afford private rental but face other barriers to securing a property will alleviate pressures on

the social housing system. The expertise that STS tenancy options workers have developed has not only helped them assist people directly, but they have also been able to assist workers in other services to build their knowledge and work together to assist people.

Case study: Supportive Tenancy Service

The ACT public advocate referred Olivia to STS after an ACAT hearing where she was at risk of losing her tenancy over rental arrears. Olivia has an intellectual disability and was heavily influenced by a man she maintained was only a friend. The friend disagreed with the rent as calculated by Housing ACT and influenced Olivia to pay less than the specified amount. Her friend also caused conflict with services and Olivia's family.*

STS tenancy support workers met with Olivia over a long period, seeking to understand what she wanted, aside from her friend's influence, and to negotiate with Housing ACT. Eventually Olivia agreed that an STS worker could take her to the doctor to ask for a support letter. The GP, who had seen Olivia several years earlier, observed that her mental and physical health had significantly declined. In discussion about her health, Olivia revealed that she had been subject to sexual assault from the friend over a period of several years. Olivia gave permission for the STS worker to contact the Domestic Violence Crisis Service (DVCS) and police, and the worker remained with Olivia for seven hours whilst her locks were changed and she was interviewed by police. Olivia attended the Magistrate's Court the next day with the support of STS and DVCS, and received an interim Domestic Violence Order (DVO).

After the DVO was served, Olivia began making the correct rental payments, and she also reconnected with her family. The STS worker made a referral to Partners in Recovery to address Olivia's mental and physical health, and the STS worker continued to support Olivia as needed around tenancy matters.

**Name has been changed.*

The STS and Street Law programs are supported by a \$90,000 per year program called the Housing Financial Counselling Service provided by Care Inc. Financial Counselling Service. The Housing Financial Counselling Service is currently trialling a modified appointment process for clients of the STS to assist them to see a financial counsellor sooner and to provide income and

expenditure statements for clients to take to ACAT to support their ongoing tenancy. The financial counsellor assists clients who are at risk of eviction to remain housed. The counsellor advocates for the client and assists them to set up a sustainable arrears arrangement that takes into account their complete financial circumstances not just their housing situation. This financial counselling program needs to continue to receive funding alongside the STS and Street Law programs.

Detailed recommendation for the 2016-17 ACT Budget

Housing-related advocacy service for people with disability

DETAILED RECOMMENDATION 3: Fund independent professional housing advocacy for people living with disability, including mental health, by investing funding for one FTE dedicated housing advocacy position to be based at ADACAS.

Program: The ACT Disability, Aged and Carer Advocacy Service (ADACAS), an independent professional advocacy service supporting people with a disability, people experiencing mental health issues, older people, and carers in the ACT

Total Cost: \$110 000, indexed annually (ongoing funding).

Efficiencies: The housing advocate will work within an established professional advocacy service with all relevant policies, procedures and processes already in place. They will be co-located with and work as part of a team of advocates (and receive support and contribute to the team accordingly) which creates opportunities for efficiency and shared work practices. This role would complement wider advocacy and program development regarding housing access and provision through the implementation of the National Disability Strategy.

What services currently exist in this space?

There are currently no dedicated housing advocates for people living with disability in the ACT. There are advocacy services in the ACT, of which ADACAS is the largest, which support people living with disability across a range of issues, including housing. There are also mainstream community services as well as housing advocacy services that would have people with disability accessing their services and seeking assistance with housing matters. These services often rely on professional advocacy support when working with people with disability or mental health issues and complex housing issues. There is, nonetheless, no dedicated housing advocate for people with disability in the ACT. In the context of the National Disability Insurance Scheme (NDIS) this presents a significant gap in service. Existing data from ADACAS (see below) demonstrates increasing demand for service in this area.

Housing and the NDIS

There is not enough available suitable housing in the ACT to meet the needs of people with disabilities. The NDIS will not resolve this issue but should be a

driver to enable more investment in suitable housing for people with disabilities in the future. Some people with disabilities will need individual advocacy support to achieve good housing outcomes. Individualised funding is unlikely to stimulate the development of skilled advocates/advisors without seed or other funding to create the expertise.

Why are housing advocacy services needed to prevent homelessness?

As was noted above, the importance and effectiveness of tenancy support and early intervention is recognised in the CSD discussion paper, *The Road Ahead*, which notes, in particular, the role of tenancy support in preventing homelessness (ACT Community Services Directorate 2015: 12-13). Independent advocacy is a vital form of tenancy support. ADACAS clients often have multiple and complex needs. Independent professional advocacy is an important safeguard in seeking to ensure that their voices are heard, their rights respected, and that clients are accessing and sustaining suitable housing.

Demand for advocacy on housing matters

ADACAS has experienced a steady, ongoing demand for advocacy on housing matters. Housing has been the most commonly sought advocacy issue for at least the past five years.⁷ Table 2 below sets out demand for housing advocacy experienced by ADACAS.

Table 2. Number and percentage of housing advocacy requests

Year	Number of ADACAS advocacy issues relating to housing matters	Housing advocacy issues (as a percentage of all advocacy issues in that financial year)
2014-15	148	31%
2013-14	127	23%
2012-13	147	25%
2011-12	165	27%

Source: ADACAS data

Though it is difficult to estimate numbers of clients, because the intensity and duration of each advocacy case varies significantly, it is anticipated that an additional 40-60 people with disability would be supported to achieve and maintain appropriate housing if a dedicated housing advocate position was created at ADACAS.

Advocacy supports the rights of people with a disability in relation to housing matters

The United Nations Convention on the Rights of Persons with Disabilities emphasises the right of people with a disability to ‘have the opportunity to choose their place of residence and where and with whom they live on an equal basis with others and not [be] obliged to live in a particular living arrangement’

⁷ For further details see ADACAS Annual Reports, available at <www.adacas.org.au/corporate-information/annual-reports>.

(UN 2006a) and 'freedom from exploitation, violence and abuse' (UN 2006b). At present there is a Commonwealth Senate inquiry into violence, abuse and neglect against people with disability in institutional and residential settings.⁸ Housing advocacy for people with a disability can be vital in ensuring that a person's situation is improved and ought to be considered a vital part of our obligations to Human Rights and to the National Disability Strategy.

Case study: Housing-related advocacy for people with disabilities

Jon is a man in his late forties, with ongoing mental and physical health issues, who has experienced multiple traumas and been a victim of crime. Over the years, Jon has received multiple 'notices to remedy' at his Housing ACT home, due to concerns regarding hoarding and squalor. Jon becomes very distressed when seeking to communicate with Housing ACT, Spotless (regarding maintenance issues) or tradespeople. Whilst Jon is proactive in seeking help, he has difficulty in maintaining working relationships with support workers.*

ADACAS advocates have assisted Jon to sustain his tenancy over many years, by working closely with Housing ACT on his behalf (writing letters, attending meetings, liaising with housing and maintenance managers), supporting Jon to maintain his connection with hoarding and squalor supports, and attending with Jon for housing inspections, and when Jon has a tradesperson completing maintenance/repairs.

As a result of ADACAS's involvement, Jon has been able to remedy issues of concern to Housing ACT, have maintenance issues (of concern to him) addressed, have housing inspections completed, and has been able to sustain his tenancy in circumstances where it may otherwise have been very difficult for him to do so.

**Name has been changed.*

8 Details of the inquiry are available at: www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/Violence_abuse_neglect.

Detailed recommendations for the 2016-17 ACT Budget

Older persons housing options advice service

DETAILED RECOMMENDATION 4: Increase in Funding for COTA ACT's Housing Option Advice Service to cover two FTE staff.

Program: A housing advice service tailored to the needs of older people in the ACT that offers advice and assistance accessing community support systems for seniors in the ACT; managing downsizing to a smaller home; public and private housing options; retirement villages; home care packages to help enable ageing in place; residential aged care facilities; private rental and other affordable accommodation options; emergency accommodation. This service also liaises with a wide range of private and community sector (NFP) service providers and various ACT Government organisations, including (but not limited to) the ACT Government's Community Services Directorate, various areas within ACT Health, the Aged Care Assessment Team (ACAT), the Rapid Assessment of the Deteriorating Aged at Risk (RADAR) Intervention Team at Canberra Hospital, the Older Persons Mental Health Service, the Canberra Living Conditions Network (CLCN), ACT Policing, ACT Fire and Rescue (in relation to hoarding and squalor issues), the ACT Government's Asbestos Response Taskforce, and the Commonwealth Department of Human Services Financial Information Service (FIS).

Total Cost: \$180 000, indexed annually (ongoing funding).

Efficiencies: COTA ACT has approximately 2500 fee paying members. These fees help to subsidise the services, research and advocacy work that COTA ACT undertakes. COTA ACT also has an active volunteer base of 90 people, many of whom are retired public servants and people with professional expertise who have specific interest in ageing related issues and freely value-add to the services COTA delivers.

What services currently exist in this space?

The only services similar to COTA ACT's Housing Option Advice Service are funded under the Assistance with Care and Housing for the Aged (ACHA) Program by the Commonwealth Department of Social Services. At present there are only three ACHA Program Providers for the ACT Region and the services provided under the ACHA Program are subject to geographical restrictions. In contrast, COTA ACT's Housing Option Advice Service provides its services to people over 50 years of age across the entire ACT Region.

A lot of older people (and carers and support workers) who need advice in relation to ageing related issues come to COTA ACT as their 'first port of call' because COTA ACT specialises in ageing related matters. Other community service organisations provide limited services targeted at the elderly and predominantly specialise in other areas such as children's services, youth

services and disability services, but COTA ACT's focus is very specifically older Canberrans.

COTA ACT has a detailed and specialised understanding of the range of affordable housing options for people who are over 50 years of age. For example, COTA ACT is currently a member of the ACT Government's Justice and Community Safety Retirement Village Legislation Review Advisory Group. This places COTA ACT in a unique position to address the complex housing pressures facing older residents of the ACT Region who, without appropriate support, are at significant risk of not being able to access affordable accommodation options and may be facing homelessness.

Why is this service needed?

The ACT has the fastest ageing population in Australia. As the ACT's population continues to age, even more pressure is going to be placed on services, particularly those related to affordable housing and health care for older ACT residents.

During the last completed reporting period (from 1 January 2015 to 30 June 2015) COTA ACT Housing Option Advice Service recorded 673 specific occasions where telephone support, counselling and advice had been provided to service users. This was a large increase on the previous reporting period (from 1 July 2014 to 31 December 2014) when there were an estimated 525 service users. This means that there has been a 28 percent increase in the demand on COTA ACT's Housing Options Advice Service over the last reporting period.

It should also be noted that under the current contract with the ACT Government for the Housing Options Advice Service (which is set to expire on 30 June 2016) COTA ACT receives funding for only 260 service users. This means that during the last reporting period COTA ACT exceeded its contractual output in terms of service users assisted by more than 158 percent on what it is funded to deliver. During the last reporting period COTA ACT's Housing Options Advice Service was funded to deliver six public information sessions. However, due to the intense demand and high number of requests received by COTA ACT for the Housing Options Advice Service, 15 public information sessions were delivered, which were attended by 495 people.

There are several factors unique to the ACT Region that will increase pressures on housing for older ACT residents into the next 4-5 years. The Mr Fluffy buy-back scheme has disproportionately adversely impacted upon seniors in the ACT region. Almost all elderly residents who have opted into the ACT Government's Buyback Concession Scheme have to move either immediately or within the next 5 years as part of their participation in the scheme. For many of these elderly residents this means relocating to newer suburbs that have significantly fewer services to support ageing residents. Most of these residents need specialist assistance to access retirement villages, home care assistance and permanent residential care. Over the past year COTA ACT has been closely working with the Asbestos Response Taskforce to address the issues facing the relocation of these elderly residents.

There are also serious impending issues in relation to the relocation of approximately 1500 public housing tenants between now and 2020. This will add increased pressure to an already significant undersupply of aged persons units (APUs) within ACT Public Housing and the allocation of existing APUs.

In short, COTA ACT is currently trying to meet this increase in demand with only one part-time staff member who provides the housing options advice service. The workload for the service, as outlined above, requires two full-time workers who are each available to work 5 days per week.

Develop whole-of-government responsibility for homelessness which includes reporting requirements and minimum funding requirements for each ACT Directorate

Ending homelessness is a whole-of-government responsibility. Homelessness occurs fundamentally as a failure of economic policy settings (labour market, housing market, income support) and secondly as a failure of existing services and supports to respond to individual vulnerabilities. Effective transitions out of the human services system—whether it is out-of-home care,⁹ the justice system,¹⁰ or mental health facilities¹¹ will have a positive impact on the number of Canberrans experiencing homelessness. Preventing and addressing homelessness therefore cannot be seen narrowly as the domain of Housing ACT.

The costs of inadequate responses to homelessness—whether longer bed days in acute health care settings, increased use of emergency health services, or longer stays in homelessness services—are not recognised or calculated in mainstream services. However, research does demonstrate that savings are possible from different forms and ways of intervening to reduce the incidence and impacts of homelessness. An AHURI research project which specifically investigated the effectiveness of homelessness programs in Western Australia, New South Wales, Victoria and South Australia in improving welfare, health, housing, justice and employment outcomes of clients found overall savings made from these interventions (Zaretsky & Flatau 2014). The project ‘measured how such programs reduced burdens on other forms of government

9 As noted above, the CREATE Foundation 2009 survey of young people transitioning from out-of-home-care found, for example, that ‘over one-third [of survey respondents] had at least one experience of homelessness in their first year of independence [from care]’ (McDowall 2009: 6).

10 As noted above, the *Journeys Home* report, which documents the findings of a longitudinal survey of people with high levels of housing insecurity, for example, finds that survey ‘[r]espondents that have ever been incarcerated, whether in juvenile detention, adult prison, or remand are particularly prone to homelessness, even when comparing to similarly vulnerable people’ (Bevitt et al. 2015: 3).

11 As noted above, there is no data kept in Australia that systematically records the number of people experiencing homelessness that have a mental illness. However, available data demonstrates a strong correlation (for an overview of the research see MHCA 2009: 14-15). This data includes a survey of people living with mental illness by SANE that ‘found that 94 per cent of respondents had been homeless or were without suitable accommodation at some point in their lives’ (as reported in MHCA 2009: 14).

expenditure, thereby achieving cost savings to the government' (Zaretzky & Flatau 2014: 2).

Key findings from the research include:

People experiencing homelessness were often high users of government non-homelessness services (e.g. health, justice and welfare), with mean costs ranging from \$18 201 per client per year (for tenant support clients) through to \$44 147 (for single men's supported accommodation clients). The very high mean cost is in part driven by welfare payments and those people who had significant contact with institutional services, such as hospital or incarceration (Zaretzky & Flatau 2014: 1).

The mean cost of health, justice and welfare services used by clients of homelessness support programs was lowered after a period of support. The associated potential mean savings to government, or cost offset to homelessness program cost, was estimated at \$3685 per client per year (Zaretzky & Flatau 2014: 2).

In previous budget submissions, ACTCOSS has recommended a need to pool funds from across portfolios to:

- maximise prevention of and early intervention in homelessness;
- reduce demand for crisis services; and
- facilitate prompt access to, and maintenance of, stable, affordable, accessible, appropriate housing for people who have been homeless.

We also called on the government to allocate a minimum of one percent of total funds from the Justice and Community Safety, Education and Training, and Health directorate budgets to contribute to expansion of housing crisis and transition support to improve access for:

- older women;
- families dealing with domestic violence;
- Aboriginal and/or Torres Strait Islander peoples;
- people who have experienced trauma;
- people exiting the criminal justice system;
- people living with a disability;
- people with mental health issues;
- people with drug and alcohol issues;
- young people;
- humanitarian entrants and people seeking asylum; and
- people from culturally and linguistically diverse backgrounds.

It is the case that some funding from these portfolios is already being directed to programs and initiatives that positively impact on housing outcomes and we

welcome these measures. For example, 2015-16 ACT Budget initiatives included enhanced mental health services funded by the Health Directorate that have the potential to impact positively on housing outcomes for people living with mental health issues in the ACT. Indeed, the Health Directorate is out-performing Education and Training and Justice and Community Safety when it comes to supporting initiatives which have a positive housing impact.¹²

Based on ACT Shelter's (2015) assessment of the 2015-16 ACT Budget, the key measures of these three directorates that relate to housing support and homelessness are costed at approximately \$6.2m (\$6 176 000). Table 3 indicates funding for key housing and homelessness measures across the three directorates for 2015-16 to assess this against the ACTCOSS recommendation for a one percent contribution from each directorate.

Table 3. 2015-16 ACT Budget allocation for key housing and homelessness measures: Education and Training, Health, and Justice and Community Safety directorates

Directorate	2015-16 Budget Estimate \$'000	ACTCOSS recommended 1% allocation (based on 2015-16 Budget Estimate) \$'000	2015-16 Budget Key Measure* Estimated Expenses \$'000	Key Measure* Expenses % of Directorate's 2015-16 Budget Estimate
Education and Training	981 656	9817	0	0.0
Health	440 240	4402	5789	1.3
Justice and Community Safety	501 925	5019	387	0.1
Total	1 923 821	19 238	6176	0.3

Source: ACT Budget 2015-16 Budget Statements with own calculations.

Note: 2015-16 ACT Budget estimate figures include the total estimated appropriations for the directorates, including Government Payments for Outputs and Capital Injections, both Controlled and Territorian.

*Key measures as determined by ACT Shelter's (2015) assessment of the 2015-16 ACT Budget.

Had the one percent allocation that ACTCOSS proposed been drawn from these three directorates an estimated allocation of approximately \$19.2 million would have been achieved. That is an additional \$13 million for initiatives addressing housing and homelessness in the current budget year. Arguably this measure could also result in cost savings in the various directorates in the long term, as investment in early intervention and prevention are known to have overall cost-saving benefits to government as evidenced above.

In this year's budget submission we reiterate and strengthen our call for a whole-of-government responsibility for housing and homelessness given the impact of the different directorates on housing risk. We extend our call for

¹² Note: these calculations are our own, from analysis of the 2015-16 ACT Budget measures. We acknowledge that there may be additional spending measures from these directorates in the housing area which we have not identified in our analysis.

Human Service directorates to contribute 1 percent of their budget and ask that **all** directorates be tasked with contributing to reducing homelessness and increasing supply of accessible, affordable housing, especially affordable rental housing.

Table 4 highlights the estimated spend from each of the directorates impacting housing and homelessness in 2016-17.

Table 4. 2016-17 ACT Budget allocation for key housing and homelessness measures for all ACT Government directorates

Directorate	2016-17 Budget Estimate \$'000	ACTCOSS recommended 1% allocation (based on 2016-17 Budget Estimate) \$'000	2016-17 Budget Key Measure* Estimated Expenses \$'000	Key Measure* Expenses % of Directorate's 2016-17 Budget Estimate
Chief Minister, Treasury and Economic Development	524 454	5245	5830	1.1
Community Services	243 718	2437	12 187	5.0
Education and Training	981 316	9813	0	0.0
Environment and Planning	50 104	501	0	0.0
Health	364 000	3640	8377	2.3
Justice and Community Safety	429 203	4292	337	0.1
Territory and Municipal Services	397 707	3977	583	0.1
Total	2 990 502	29 905	27 314	0.9

Source: ACT Budget 2015-16 Budget Statements with own calculations.

Note: 2016-17 Budget estimate figures include the total estimated appropriations for the directorates, including Government Payments for Outputs and Capital Injections, both Controlled and Territorian.

*Key measures as determined by ACT Shelter's (2015) assessment of the 2015-16 ACT Budget.

Brief recommendations for the 2016-17 ACT Budget

RECOMMENDATION 3: All directorates to report on how their roles and responsibilities impact on homelessness and the supply of accessible, affordable housing as part of their annual reporting requirements

RECOMMENDATION 4: Any directorate not already contributing at least one percent of their operating budget to housing and/or reducing homelessness to allocate one percent of their operating budget to fund additional measures that increase provision of services to reduce homelessness and increase supply of accessible, affordable housing.

RECOMMENDATION 5: Provide recurrent funding for the Corrections Throughcare initiative as this program has a significant impact on accessing and sustaining housing after a period of incarceration in the criminal justice system.

RECOMMENDATION 6: Fund knowledge and skills development so that people working with men and women exiting out-of-home care, mental health, drug and alcohol, acute health care, criminal justice, and homelessness services are able to provide tenancy advice/advocacy/support.

Increase supply of housing and increase accessible and affordable rental housing in the ACT

The *Journey's Home* report found that:

The state of the housing market appears to have quite a strong association with homelessness. Not only are rates of homelessness higher in areas with higher housing costs, but those who move to areas with cheaper housing are much more likely to exit homelessness (Bevitt et al. 2015: 96)

Increasing affordable, accessible housing is fundamental to addressing homelessness.

In November 2014, the ACT Housing Consortium (ACT Shelter, ACTCOSS, the Youth Coalition of the ACT, and WCHM) commissioned Newspoll to conduct a survey of 1000 Canberra households. The survey found comparable levels of housing stress amongst people earning between \$40 000 and \$70 000 and those earning below \$40 000 a year. A person is deemed to be in housing stress and face difficulty meeting other costs of living if they are in bottom 40 percent of income earners and allocating more than 30 percent of their income to housing costs. Households in the \$40 000–\$69 000 per year income bracket were allocating 36 percent of their income on average to rent compared with 37 percent for those earning below \$40 000 (ACT Shelter et al. 2015). This is due to the effect of public housing quarantining rent at 25 percent of income. Nearly 40 percent of people earning less than \$40 000 a year indicated they lived in public housing (ACT Shelter et al. 2015). This research highlights the importance of public housing stock as a protective factor for people on low incomes. It also suggests that people earning \$40 000–\$69 000 a year need specific interventions to ensure that the housing market remains affordable to them.

People in this income range are not a priority group for eligibility for social housing yet our research shows that they are just as likely to compromise on health and medical treatments and food and groceries in order to meet the costs of housing as people earning less than \$40 000 (ACT Shelter et al. 2015). The survey findings and accompanying focus groups showed people were less willing to miss rent payments than to forego other expenses such as visits to a GP as they prioritised keeping a roof over their heads (ACT Shelter et al. 2015).

There are many suggestions for how to best achieve this goal. On the basis of the academic literature and our insight into community need, ACTCOSS recommends a four-pronged approach that includes:

- an overarching policy commitment to increasing affordability and accessibility of rental housing (Davison et al. 2014: 1);
- annual reporting by the Land Development Agency (LDA) on how their activities have contributed to housing affordability in the ACT for below average income households;
- funding ACT Shelter to aggregate data on the many housing affordability endeavours and enterprises that are currently being carried out in the ACT, and report publicly on how the ACT is tracking. There are many different actors trialling different strategies for different population groups in the ACT—having a central repository where this information could be collected and disseminated would help the government, private and community sectors learn more about what is happening, what works, and what can be replicated or scaled up to improve the impacts of our efforts; and
- development of a land release pipeline to increase certainty and reduce the costs associated with housing development and construction.

We also outline a proposal that would specifically address housing affordability issues for people in the \$40 000–\$69 000 income bracket through a line of credit to be extended that would enable another not-for-profit provider to become a Tier One affordable housing provider in the ACT.

Detailed recommendation for the 2016-17 ACT Budget

Expanding funding base for not-for-profit development of accessible, affordable Housing

DETAILED RECOMMENDATION 5: The ACT Government divert \$100 million from its investment portfolio in bonds to create an investment fund for community housing providers for the purpose of building new accessible, affordable rental housing. The fund would be held in perpetuity and repaid at government bond rates.

Program: Credit facility to finance the growth of affordable housing owned and managed by community housing providers in the ACT.

Total Cost: \$100 million diverted from the current ACT Government investment portfolio.

What services currently exist in this space?

The ACT has a small community and affordable housing sector with a handful of providers and only one Tier One growth provider. At present, community housing makes up just five percent of the 11 500 social housing properties in the ACT (AIHW 2015: 20).

Nationally, the community and affordable housing sector is expanding significantly and the new national regulatory framework for providers has given financial institutions increased confidence that not-for-profit housing is a mature market worthy of extending lines of credit.

The ACT Government has previously recognised the value of investing in community housing through the provision of a \$70 million revolving loan facility for Community Housing Canberra (CHC). That line of credit has enabled that provider to establish itself as a Tier One growth provider with a portfolio of more than 400 homes (CHC 2014: 8).

To date, this has been the only dedicated funded initiative to stimulate growth of the not-for-profit housing sector in the ACT. The initiative could build on the success of the loan facility provided to CHC which has been a catalyst for its expansion as the ACT's only provider accredited as a Tier One developer in the National Regulatory System. It would increase the borrowing capacity of community housing providers to leverage against their asset base to build more affordable homes for people in need.

There is a need to stimulate the growth of the not-for-profit housing sector to ensure it is well placed to take advantage of development opportunities created by the urban renewal process and the release of greenfield sites.

Why is this intervention needed?

Additional affordable rental properties owned and managed by community and affordable housing providers are needed to address rental stress amongst people in the second income quintile who may not be eligible for Housing ACT properties.

The properties this initiative would fund would be let at 74.9 percent of market rent. This would alleviate housing stress for beneficiaries earning \$40 000–\$69 000 per year by delivering effective savings of \$118 a week for a tenant in a three bedroom house and \$96 a week for a tenant in a two bedroom unit.¹³ Similar interventions like Commonwealth Rent Assistance (maximum \$140 per fortnight) have been shown to alleviate housing stress for around 40 percent of people (Senate Estimates 2014). People in the target group for this intervention will not be eligible for Commonwealth Rent Assistance as they are not on income support.

Research suggests around 40 percent of people tenancing National Rental Affordability Scheme (NRAS) properties would no longer be in housing stress as a result of the 20 percent rent subsidy it provided (Ong & Wood 2009: 2). The loss of NRAS at a national level means hundreds of properties that could have serviced this target group will no longer be available underscoring the need for a similar intervention at a Territory level.

The experience of CHC demonstrates that the provision of a line of credit to an affordable housing provider is an effective means of generating additional affordable housing in the ACT. CHC is now fully self-sustaining, repaying the loan and in a position to embark on self-sustaining developments.

The ACT Government has an estimated \$3.5 billion in investments in bonds, shares and stocks. These investments are made according to its ethical investment charter. We propose that \$100 million of this money, which would normally be invested in bonds, be loaned to community housing providers for the construction of new affordable housing. In addition, the ACT Government would offer land as an in-kind contribution. Given the current fiscal position of the ACT Budget and the mid-term economic outlook, this could be done at concessional rates.

The loan would be held in perpetuity and the interest rate applied to the loan be adjusted in response to movements in the bond market rate. Interest rates are at historic lows and are projected to remain so for the foreseeable future. Now is the opportune time to provide the necessary lines of credit to ensure the not-for-profit housing sector can take its place as a significant provider of homes for Canberrans on low to moderate incomes.

The credit line would deliver additional supply of up to 500 new affordable rental homes across the ACT. The initiative would expand community housing stock in the ACT by up to 100 percent over the next five years (AIHW 2015: 20). The initiative would provide not-for-profit housing providers with the necessary additional capital to increase investment in the ACT and in doing so contribute to the ACT Government's economic diversification agenda.

¹³ Calculations are based on weekly rent figures for Canberra accessed via the SQM Research website, accessed 1 October 2015 at <www.sqmresearch.com.au/weekly-rents.php?region=act%3A%3ACanberra&type=c&t=1>.

Detailed recommendation for the 2016-17 ACT Budget

ACT Community Sector Housing Policy Consortium

DETAILED RECOMMENDATION 6: Fund housing and homelessness original research and subsequent policy and advocacy work to be undertaken by the Housing Policy Consortium peak bodies: ACT Shelter, the ACT Council of Social Service, the Youth Coalition of the ACT, and the Women's Centre for Health Matters.

Service: Housing and Homelessness Policy Consortium (ACT Shelter, ACTCOSS, Youth Coalition of the ACT, and WCHM)

Total Cost: Approximately \$85 000 per year for one FTE research officer position to be based at ACT Shelter.

Efficiencies: Approximately \$40 000 in-kind contributions from consortium partners.

What services currently exist in this space?

There is a dearth of literature that specifically explores housing crisis and the impact of homelessness services in the ACT. Research by the Housing Policy Consortium has been filling a genuine gap in knowledge. In the context of funding uncertainty for services and the need for a responsive service system, up-to-date information that investigates causes of homelessness and impacts of different service models is a vital part of any policy effort to improve housing security in the ACT. This funding could be seen to honour the Parliamentary agreement which includes as point 6.4: 'Provide additional funding of at least \$334,000 over four years for housing and homelessness policy and advocacy work' (ACT Legislative Assembly 2012: 8)

How does this initiative fit into the housing and homelessness service system?

Having up-to-date ACT-specific research on needs and effectiveness of interventions is an important mechanism for establishing priorities and informing government regarding the allocation of resources. A central research body that draws on the expertise of existing peak bodies and their different constituencies would also support a whole-of-service system approach, rather than a siloed approach with each agency advocating for itself. A cross-sector resource such as this would collate the voices of the housing and homelessness sector representing approximately 47 agencies and organisations. Improved access to information and more targeted allocation of resources has the potential to improve outcomes for people experiencing housing crisis by ensuring that our service system is well informed and responsive to need. Taking this approach to improved local research, information sharing, and cross-sector partnering is consistent with the Human Services Blueprint principles of providing the right service, at the right time, for the right duration.

Brief recommendations for the 2016-17 ACT Budget

RECOMMENDATION 7: Legislate a set of minimum standards in energy efficiency for private rental properties, whilst maintaining affordable rents.

RECOMMENDATION 8: Apply the principles underpinning the Affordable Rental Scheme (that sets rent payments as a percentage of income instead of a percentage of market rent), currently open to people over 65 who meet an income eligibility threshold, to a wider group of low income households in order to create a system that could be applied to all people experiencing disadvantage in the ACT.

RECOMMENDATION 9: Provide seed funding to support development of partnerships between the private real estate industry and housing support services, including:

The Supportive Tenancy Service—to increase its reach into the private rental market, recognising the benefits of tenancy support to government, landlords, real estate agents and tenants.

The Human Services Gateway—to increase access to private rental market accommodation options.

RECOMMENDATION 10: Establish a Community/Government/Industry Steering Group to oversight and provide advice on implementation and evaluation of effectiveness of the Affordable Housing Action Plan.

RECOMMENDATION 11: Require all new dwellings to comply with universal design standards.

RECOMMENDATION 12: Expand the Energy Efficiency Program and the Outreach Program to more proactively engage private sector and community housing landlords and tenants who are unable to afford fee-for-service support.

RECOMMENDATION 13: The ACT Government offer incentives for landlords to increase the energy efficiency of their homes so fewer tenants need to rely on energy and water concessions in order to meet their energy costs.

RECOMMENDATION 14: Establish a Community/Government/Industry Steering Group to oversight and provide advice on implementation and evaluation of effectiveness of the Affordable Housing Action Plan.

Education — a community need in the ACT

ACTCOSS, in partnership with the Youth Coalition of the ACT recently published an issues paper on educational inequity in the ACT (Cuzzillo & Ragless 2015). Below, we summarise the findings of that paper.

Education is key to supporting young people's employment pathways. Education, particularly higher education, is directly linked with employment and income. In their report, *Australia's Welfare 2013*, The Australian Institute of Health and Welfare find that people with a non-school qualification, be it a certificate, diploma or advanced diploma, bachelor degree or graduate qualification, '*have higher rates of participation in the labour force and lower rates of unemployment than people without such qualifications.*'

There is a strong correlation between education and health. Low education attainment rates have been linked to many negative health outcomes, with early school leavers twice as likely to experience a long term health problem in their life than those with higher education. Conversely, poor health inhibits concentration and student's ability to learn, as well as leading to increased levels of absenteeism and disengagement from school.

[...]

Given the impact education can have on a person's life it is vital that all young people are supported to have the same opportunities and educational outcomes as their peers. A recent report by the Committee for Economic Development on addressing entrenched disadvantage in Australia suggests that a focus on education is important because disadvantage begins early in life and education is crucial to improving equality of opportunity for all Australians (Cuzzillo & Ragless 2015: 3).¹⁴

Clearly, education has a bearing on the welfare and wellbeing of individuals. Education also impacts on people's labour market experiences and their earned incomes in later life. The ACT is primarily a knowledge economy, and much of the ACT Government's economic development agenda relates to growing this part of our economy. Evidence was noted in the discussion above of the relationship between educational attainment and employment opportunities. It was noted that in the ACT:

- People aged 25-34 who have not completed Year 12 have an 8.4 percent unemployment rate and the lowest employment participation rate of 72.1 percent.
- Those with a Certificate I/II as their highest level of education have a 13.7 percent unemployment rate and an 80 percent participation rate.
- Those with a bachelor degree have a 2.2 percent unemployment rate and 90.9 percent participation rate.
- Those with a Certificate III/IV also have a low unemployment rate at 2.1 percent and the highest participation rate of 92 percent (Perry 2014: 16).

¹⁴ For internal references see original source.

Equitable access to, and outcomes from, education are essential for inclusive and sustainable economic growth.

While Australia generally, and the ACT in particular, have good educational systems, it is once again the case in the ACT that our performance at the aggregate level conceals the reality of disadvantage and low attainment that exists for some children and young people in our community. The Youth Coalition/ACTCOSS issues paper provides further detail on this issue:

As a result of the diversity within Canberra's suburbs, most ACT schools have small numbers of highly disadvantaged students, rather than disadvantage being concentrated in a few schools. This may pose a challenge for schools in responding and providing appropriate supports for the small number of students experiencing disadvantage.

Researchers in curriculum and educational systems and policy from the University of Canberra, Philip Roberts and Dr Simon Leonard, highlight the issues that arise when only looking at the average performance of students in the ACT. They suggest that the ACT relies on the large cohort of students with high socioeconomic status to maintain the appearance that the ACT is leading the country when it comes to education.

Results from the 2012 Program for International Student Assessment (PISA) show that, on average, ACT students outperformed students from other states and territories across reading, mathematical and scientific literacy measures. However, relying on the ACT's comparative 'average' rank in national and international testing hides the significant inequity in the ACT's education system. Roberts and Leonard report: *'A close examination of the PISA report shows that the ACT quickly falls to near the bottom of the nation when it comes to equity in education with only the Northern Territory showing a greater connection between SES [socio-economic status] background and PISA achievement... Especially striking is that the ACT has the biggest in school variation linked to student SES of any Australian jurisdiction. There may not be much difference between schools, but within them students are performing very differently based on their SES background'* (Cuzzillo & Ragless 2015: 5).¹⁵

It is also well documented that Aboriginal and/or Torres Strait Islander students are particularly disadvantaged by the education system in the ACT:

The 2014 National Assessment Program – Literacy and Numeracy (NAPLAN) results show that in the ACT the gap is larger in year 9 compared to year 3 across all indicators – reading, persuasive writing, grammar and punctuation, spelling and numeracy. In addition, only around 64 per cent of Aboriginal and Torres Strait Islander year 10 students continue to year 12, compared to 90 per cent of all year 10 students in the ACT.

The 2014 NAPLAN results also reveal that Aboriginal and Torres Strait Islander students in the ACT do not perform as well as some of their urban counterparts in other states and territories. For example, 18.3 per cent of Aboriginal and Torres Strait Islander students in year 9 were below the minimum standard in reading, a higher proportion than in metropolitan

15 For internal references see original source.

areas of Victoria, Tasmania and New South Wales (Cuzzillo & Ragless 2015: 7).

As stated in the issues paper:

The educational achievement of young Canberrans is everyone's business. The ACT economy, oriented primarily towards service delivery and public administration, is knowledge-based and relies on a highly educated population to support its growth. While on average it appears Canberra is leading the nation when it comes to education, the ACT education system is far from equitable (Cuzzillo & Ragless 2015: 8).

Ensuring that the education system becomes equitable and that the gap in educational attainment is closed is vital if we are to have an inclusive economy in the ACT.

We believe it is not possible for schools, operating in isolation, to make significant improvements in the education attainment of students who are not currently meeting attainment thresholds. ACTCOSS would like to see adoption of whole-of-school systems and school/community partnerships that embed a universal focus on social and emotional wellbeing of students, with referral pathways for students who need more support. There are excellent examples in the ACT of school-community partnerships that are and have delivered significant improvements in school inclusion and student attainment. However, these are not systematic and do not guarantee all students in similar circumstances or facing similar challenges can benefit from school-community partnerships. The recommendations outlined below focus on building effective, appropriate partnerships between schools and community services.

ACTCOSS has two overarching priorities in education spending:

- full implementation of the Gonski school funding plan to increase the school outcomes of students experiencing disadvantage (including both needs based distribution of funding, and the additional funding component); and
- explicit objectives, indicators and targets directed at improving school outcomes for students experiencing disadvantage, including those who are in the bottom 40 percent for education attainment.

Brief recommendations for the 2016-17 ACT Budget

Engagement of students, communities, and families, including those living with disadvantage

RECOMMENDATION 15: Report on the investment in, uptake and impact of the Engaging Schools Framework to understand whether it is on track to meet the needs of all students, including those most at risk of disengaging from education.

RECOMMENDATION 16: Resourcing the Progressing Parental Engagement Project so it can appropriately support schools to work with and engage with a range of families, including Aboriginal and Torres Strait Islander families, low socio economic families and refugee families.

RECOMMENDATION 17: Investment in and expansion of successful programs that increase the capacity of schools to work well with students with a history of trauma, including training for teachers and partnerships with services outside of schools.

Schools and local community service agencies build strong collaborative relationships, and have capacity to respond flexibly and share resources to improve educational outcomes for young people.

RECOMMENDATION 18: Increase resourcing to improve educational outcomes and close the gap in educational outcomes for Aboriginal and Torres Strait Islander students. This should involve schools and Education and Training Directorate investing in building the capacity of schools to work with Aboriginal and Torres Strait Islander families to improve educational outcomes for Aboriginal and Torres Strait Islander young people.

RECOMMENDATION 19: Invest in building the capacity of community based Aboriginal & Torres Strait Islander services, who have established connections with families, to work collaboratively with schools and other community services to improve educational outcomes for young people and their families.

RECOMMENDATION 20: Invest in building the capacity of community based Aboriginal & Torres Strait Islander services, who have established connections with families, to work collaboratively with schools and other community services to improve educational outcomes for young people and their families.

RECOMMENDATION 21: Evaluate referral mechanisms used by schools and teachers to connect students and their families to community and health services.

Support for students who have disengaged or are at risk of disengaging from education

RECOMMENDATION 22: Invest in community services to increase capacity to partner with schools and provide targeted intensive supports to young people and their families.

RECOMMENDATION 23: Refocus investment in the needs of students experiencing disadvantage early and continue throughout childhood and teenage years using long term programs that support young people through their schooling lifetime.

RECOMMENDATION 24: Provide new funding for early intervention in the early childhood and education settings for young children with social and emotional support needs that put them at risk of low education attainment to improve their engagement in learning and strengthen their peer relationships.

RECOMMENDATION 25: Increased intensive focus on students aged 8-12 years old showing low attainment and at risk of entering high school unable to participate.

RECOMMENDATION 26: Invest in community services to provide targeted support to children and young people, particularly those aged 8-12 showing low attainment and at risk of entering high school unable to participate, to successfully transition from primary to high school.

RECOMMENDATION 27: Evaluate the short and medium / longer term educational engagement and employability outcomes for young people who have participated in the ACT Flexible Learning Options program. Based on the findings of this evaluation, invest in an evidence based approach to flexible learning options that includes a focus on education and employment outcomes at 6, 12 and 18 months.

RECOMMENDATION 28: Continue to support services that provide case management and group work in schools and expand resources to expand capacity and reach of services who work collaboratively with schools.

Transport — a community need in the ACT

At least since the 1960s Canberra has been a city designed for the car. The costs of maintaining a car are significant. In 2013, as part of its Australian Social Trends data series, the ABS published a summary statement on the costs of car ownership in Australia. The ABS reported that:

In 2012, approximately 7 in 10 people (71%) aged 18 years and over travelled to work or full time study primarily by passenger vehicle, similar to 2009 (72%). [...]

The majority (88%) of Australians also used a passenger vehicle to get to places other than work in 2012, such as to go shopping or visiting family and friends. [...]

Buying a vehicle is one of the large purchases most people make. Of the 1.7 million households who purchased one or more motor vehicles between March 2011 and March 2012, over half (58%) considered the purchase cost as a key factor, followed by fuel economy/running costs (46%). [...]

The financial cost of owning a passenger vehicle continues long after the initial purchase. In 2009-10, average weekly household expenditure on motor vehicle fuels, lubricants and additives was \$51 per week, a real increase of \$12 (at 2009-10 prices) since 2003-04 (ABS 2013).

These named running costs do not include license and registration fees or parking fees. Nor do they include expenses for new and learner drivers like the \$175 Road Ready course which all first time drivers in the ACT, of any age, must complete in order to sit the learner driver test process.

In their report, the ABS also state that:

Not all Australians are able to drive, have access to, or own a passenger vehicle. For these Australians, a city which is car dependent may restrict their access to services, employment, shops, social and other activities. Under the Australian Government's Liveable Cities program, a key goal is to improve accessibility and reduce dependence on private vehicles through improving transport options.

In 2010, nearly half (48%) of adults without access to a passenger vehicle felt they sometimes or often had difficulty getting to places. However, for people who had access to a passenger vehicle, 1 in 10 adults (10%) felt that they sometimes or often had difficulty getting to places (ABS 2013).

Not being able to drive, not having access to a car, and/or not being able to afford the significant costs involved in buying and running a car, has clear consequence for people's ability to work, access services and to be engaged in their community. What this highlights is that transport is a social determinant of health. It also highlights the importance of effective alternatives to private transport for people's health and welfare.

Our public transport system in the ACT is, by comparison to other Australian states, relatively infrequent and runs to a very limited schedule outside of commuter and business hours. On Sundays and public holidays, for example,

the bus schedule ends at approximately 7pm.¹⁶ While our services are less frequent than other states, the emphasis on commuter transport in the ACT and on transport in inner city areas appears to be consistent with a national trend. In their review of literature on public transport and health, Christl et al. (2009) report that:

An analysis of data on public transport and private motor vehicle use from Australian Government sources found that most public transport is provided in central business district areas, and that it benefits higher income earners more than lower income earners (Christl, Harris and Wise 2009: 6).

The ABS report states that:

Not being able to access public transport is one of the main reasons for people to use passenger vehicles to get to work or study. In 2012, of adults who travelled by passenger vehicle to work or study, over a half (53%) stated that a lack of public transport services (at all or at the right or convenient time) was one of the main reasons for not taking public transport (ABS 2013).

Some alternatives to mass transit as the primary form of public transport have been trialled in the ACT in recent years. The Flexibus service, which utilises existing vehicles in the ACT Government funded bus fleet to provide additional bus services for older people and people living with disability in the community during the hours of 9am and 2pm is addressing a genuine transport need. But this is not the only incidence of transport need in our community.

ABS data highlights the fact that younger people are more likely to rely on public transport than private cars to commute to work and study:

In 2012, people aged 55-64 years were the most likely to drive to work or full-time study (78%), while young people (aged 18-24 years) were the least likely age group (63%). Young people were the most likely to take public transport (28%) to work or study, compared with older age groups (ABS 2013).

Furthermore, investments in transport that have been made in recent years have not been made in improving the regularity or the frequency of public transport. Instead, networks have been 'straightened up' which has meant less travel time for those who are well served by the Action bus network, but greater travel distances for those who are not. Nor have investments in transport focused on ensuring access for all in our community who experience transport disadvantage.

A qualitative study undertaken in Adelaide that examined access to food and the intersection of food deserts and transport found that access problems were not so much the result of *'geographic distance between home and shop, as [they are] the social or welfare networks that allow people to access private transport'* (Coveney & O'Dwyer 2009: 44).

¹⁶ That is, the central pick up of last runs starts at approximately 7pm. The run ends some time later when the bus reaches its final stop.

This research is a practical example of what it means to consider transport as a social determinant of health and the consequence of limiting eligibility for community transport. The researchers conclude:

Our study found that access to food supplies is made easier for some who have been given support or an allowance because of disability or infirmity. Assistance given to people in these situations is reassuring. More worrying is the lack of assistance for those on low income and who cannot afford independent transport. For these people, getting to the food shops appears to be very difficult, whether or not they are from a food desert. Many have developed pragmatic ways to address these difficulties, such as walking or taking the bus to shops and getting a taxi home. However, these families receive no financial assistance for this travel even though they are financially needy. They are thus doubly disadvantaged by both isolation and by cost of transport for food shopping (Coveney & O'Dwyer 2009: 54-55).

In the ACT, we follow a similar trend of not supporting people on low incomes who experience transport disadvantage. Transport is an area of major infrastructure spending for government and it is vital that our policy settings are not focused solely on designing public transport for nine to five commuters living in already well serviced transport corridors. If we are to grow and diversify our economy in a way that is inclusive and sustainable we need to ensure that our transport system is accessible to all and that it provides adequate access to work, health and education facilities, food and other shopping amenities, and maintaining social networks (friends, family), for *all* who need it.

ACTCOSS has three key requirements of any new development in transport: that it is (1) accessible, (2) affordable, and (3) fit-for-purpose—incorporating east-to-west travel needs and within-neighbourhood travel inside and outside of peak hours, transport to access education, health and community services as well as meeting the need for mass transit for nine to five commuters.

Brief recommendations for the 2016-17 ACT Budget

RECOMMENDATION 29: Assess investment in transport against the impact of transport infrastructure spending on increasing the affordability and accessibility of transport for people who are transport disadvantaged to access work, health and education facilities, food and other shopping amenities, and social networks.

RECOMMENDATION 30: Improve and increase access to public transport in neighbourhoods and regional centres, with a focus on increasing affordable and accessible transport for East-West travel.

RECOMMENDATION 31: Expand the 2015-16 investment to improve accessibility of bus stops, lighting and pedestrian infrastructure.

RECOMMENDATION 32: Provide funding to remedy the layouts of bus interchanges and location of taxi ranks to make them more accessible for people with disabilities.

RECOMMENDATION 33: Expand eligibility for and promotion of Flexibus to any residents in the areas covered who are transport disadvantaged.

Critical gaps in social services and our safety net

Translating and Interpreting Service

Withdrawal of Translating and Interpreting Service [TIS] has been impacting on the community sector's capacity to provide appropriate services to non-English speaking service users. Indeed, this issue was raised in at least one submission to the ACT Government's *Roadmap to enhancing our city's multicultural way of life* consultation in February this year (WCHM 2015).

Currently some of the Specialist Homelessness Service [SHS] providers are reporting that they are unable to support non-English speaking service users due to insufficient funding to meet increased interpreter costs. Cost barriers have resulted in exclusion of vulnerable individuals and families from much-needed specialist services.

The existence of service users who may require translation and interpreter services in the SHS is acknowledged by the government. The discussion paper prepared by the ACT Government Community Services Directorate on the future of SHS in the ACT, for example, acknowledges that: '*Recent service provider data is showing an increase in the number of women from culturally and linguistically diverse backgrounds who require more intensive support in relation to immigration matters and integration into the community*' (Community Services Directorate 2015: 10).

Reimbursement of TIS will enable access of non-English speaking clients to specialist services as well as providing professional, impartial translation services throughout the case management process.

Brief recommendation for the 2016-17 ACT Budget

RECOMMENDATION 34: Fund organisations to access TIS services.

NDIS Transition

The ACT will be the first jurisdiction to transition to a full roll-out of the NDIS. ACTCOSS is positive and supportive of the NDIS and the principles of control and choice that underpin it. We have advocated strongly for a consistent standard of service, choice and control to be offered to people accessing home care supports where they are not funded through the NDIS.

The most critical emerging gap in our service system in this domain is for people not eligible for the NDIS who will be accessing Home and Community Care (HACC) services funded by the ACT Government. For a period of over 12

months ACT HACC services have consistently reported turning away eligible clients due to service demand outweighing service capacity. This situation has occurred in the context of the transition to the NDIS, which has seen a majority of HACC funding being transitioned to the NDIS. It is also occurring at a time where there has been no annual growth funding for disability services for two years.

ACTCOSS has recently conducted a HACC Unmet Need Survey as part of a HACC Capacity and Mapping Project (ACTCOSS 2015b). This survey aimed to measure the number of people with a disability in the ACT who are not able to access a HACC service they need to be independent in the community. It was conducted for a four-week period.

This snapshot found 30 people with disability were not able to receive the support they needed. The two service types with the most demand were domestic assistance (with 47 percent of people needing this service) and counselling, support and advocacy (with 40 percent of people needing this service). These were followed by 27 percent of people needing social support, 20 percent needing case management services, and 17 percent needing personal care. In terms of geographical location of unmet need, there was a spread across Canberra, but with the highest numbers located in Belconnen (31 percent) and the Inner South of Canberra (24 percent). HACC services are currently in the process of reform in the context of the NDIS transition. As part of this reform process it is critical to look at the broad objectives and operational framework developed in the Human Services Blueprint (HSB) and develop a HACC service system that is consistent with the HSB.

In any future procurement of HACC services continuity of care relationships, building on existing capacity, and improving choice and control should be priorities. The procurement of HACC services should be planned in a coordinated way with procurement and development of other services including: mental health care, social and community participation programs, palliative care, carer support, chronic health care management, hospital models of care, and pre-post admission planning and transport. For clients in services that do not continue to receive HACC funding, adequate time for transition to new services is critical to ensure there is no detrimental impact on support to clients.

There is a strong narrative in service reform about the value of aggregating services in larger, more generalist organisations, with the assumption that administrative costs are reduced and there is greater capability development within the entity. Any procurement plan should assess both the value and costs of specialist services, ensure successful specialist services have demonstrated actual specialist knowledge/skills, assess the impact of reduced diversity of services on consumer choice and control, and ensure that operational and administrative components are included in an analysis of organisation efficiency.

The future provision of HACC services also needs to include resourcing for workforce capability development. This means incorporating growth funding and proper indexation rates into planned funding models.

Brief recommendation for the 2016-17 ACT Budget

RECOMMENDATION 35: Until the review and reform of the ACT HACC Program occurs, provide access to one-off individual HACC funding for clients who cannot access HACC Services due to lack of places. This should be flexible to providing whatever support type is needed.

RECOMMENDATION 36: Design funding to be responsive to the support needs that are created when individuals living with mental illness who may be eligible for the NDIS choose not to be participants, preferring to access services outside of the context of the NDIS.

RECOMMENDATION 37: Ensure that NDIS Information, Linkage and Capacity Building (ILC) services, include the design and development of aids and equipment; advice, information; peer networking; and independent advocacy, and remain viable and available to all people living with disability in the ACT. Where necessary and appropriate this may require ongoing block funding.

RECOMMENDATION 38: Ensure that people who are not eligible for the NDIS but require home-based support (currently provided through HACC Services) are able to access services appropriate to individual need and that existing services are adequate to meet current and future demand, with annual growth funding included in the design of the program.

RECOMMENDATION 39: Where there is evidence of need, provide growth funding for services. For example, services for people who have cognitive and decision-making challenges concurrent with physical and mental health issues.

The other critical gap emerging as the NDIS is implemented across the whole of the community is the lack of accessible, affordable housing and access to advice and assistance to modify existing housing stock to meet the needs of people with disabilities.

The nature of NDIS arrangements, packages and pricing schedules mean that the NDIS alone is not going to bring more housing providers into the ACT. Of particular concern is the lack of options for people living with disability who don't have access to family or informal supports. People without informal supports or whose families are unable to continue providing support are being forced out of their current housing and into high care/nursing home environments due to a lack of disability supports that would support an independent housing choice.

The extent of homelessness and housing stress in the disability community can be invisible. For instance young people with disability can feel trapped in housing which is inappropriate to their lifestyle or without alternative housing options, so they remain exposed to issues such as family violence.

The evidence to support these concerns has been documented in numerous ACT Government, advocacy and academic reports (see AHURI 2008; ACT Government 2009; Australian Government 2013; NDS ACT 2013; Anglicare Australia 2015).

The recommendations related to housing and homelessness in this submission include meeting the needs of people living with disability. Some additional recommendations are provided below.

Brief recommendations for the 2016-17 ACT Budget

RECOMMENDATION 40: In addition to a housing advocacy service for people living with disability, as outlined at recommendation 3 above, establish a Capital Housing Support Program to provide expert advice to people with disability and/or families/supporters who are considering home modifications to their family home, or the purchase of a new property, or accessing equity in their family home, to provide suitable and secure housing tenure for their family member or members with disability.

RECOMMENDATION 41: The ACT Government work closely with the Australian Government and the National Disability Insurance Agency to investigate and develop appropriate housing options under the National Disability Insurance Scheme including housing modifications, user cost of capital funding or Special Disability Trusts to provide increased 'choice and control' for secure and long-term housing for people with disability.

ACT Concession Scheme

In April this year, ACTCOSS forwarded a formal submission to the *Review of the ACT Concessions Scheme*. In our submission we noted that:

Concessions are one part of a complex arrangement for supporting people in our community. They are, effectively, State/Territory subsidised assistance to an individual or household that increases their capacity to cover the costs of living. As most recipients also are entitled to income support, the Concessions Program complements Commonwealth expenditure on income support payments.

A reduction in concessions as a cost saving measure risks harm to the most vulnerable and disadvantaged in our community. Many of these households struggle with meeting basic expenses as things stand currently: they often have difficulty paying utility and medical expenses in particular. They are regularly forced into decisions about which 'necessity' they should go without. Reducing the value of concessions for this group increases the possibility that they will become more isolated and disconnected from their community (ACTCOSS 2015).

We have highlighted through this submission the existence of disadvantage and need in our community. Access to concessions is one of the fundamental ways in which people on the lowest incomes are supported to manage cost of living pressures. We also reiterate that there are risks in making savings from the concession program as any changes to the concessions program may have flow on effects to other government services. The full costs and benefits of proposed changes need to be understood.

Brief recommendations for the 2016-17 ACT Budget

RECOMMENDATION 42: Sustain public housing tenant rent charges at 25 percent of assessable income.

RECOMMENDATION 43: Maintain seniors' concessions at 2013-14 levels plus inflation and improve them where possible.

RECOMMENDATION 44: Develop a water consumption concession scheme for private rental tenants.

RECOMMENDATION 45: Introduce license and registration concessions for probationary and restricted licenses, and for low-income households of working age.

RECOMMENDATION 46: Expand promotion of the concessions program, including for those who do not access online information.

RECOMMENDATION 47: Undertake a cost-benefit analysis in relation to concessions — particularly looking at whether any reductions in concessions are likely to result in cost increases in other parts of the human services system, including health, education, justice, and community services.

RECOMMENDATION 48: Adopt a comprehensive financial assistance scheme for the ACT Alcohol Ignition Interlock Program that will introduce flexibility for individuals on low incomes. The financial assistance scheme should include, in addition to maintenance of the existing 35 percent concession, severe financial hardship assistance for those assessed as eligible. Such a scheme could be developed to be consistent with the approach of Infringement Notice Management Plans whereby individuals who are deemed eligible to participate may be able to repay the cost of their interlock device by instalments, by participation in a Work or Development Program (WDP), or potentially receive a waiver in extreme circumstances.

RECOMMENDATION 49: Ensure no additional charges are incurred for making use of payment plans rather than upfront complete payment of fees, fines and charges.

RECOMMENDATION 50: The ACT Government seek funds from the Commonwealth Government to share the costs associated with concessions given for registration of diplomatic vehicles.

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