Literature review: older women and housing in the ACT

Prepared by YWCA Canberra and ACTCOSS - May 2017

Single older women comprise a rapidly growing cohort facing housing insecurity and the risk of homelessness. A constellation of factors has contributed to the emergence of older single women as a group at heightened risk of housing insecurity, including years of unpaid caring, wage inequities, less secure work tenure, insufficient superannuation, relationship breakdown and the rising costs of living\textsuperscript{1,2,3,4,5}.

Often referred to as an impending “tsunami”, this analogy points to the emerging crises facing older women\textsuperscript{6,7} 2015-2016 saw a 17.5\% increase in older women seeking help from homelessness services – twice the rate of growth in the general population. However, it is widely recognised that older women are still largely invisible from the official figures and that therefore the size and scale of the problem is not yet fully comprehended\textsuperscript{8,9}. This invisibility can be understood by the lack of a gendered understanding of housing risk, consequently unsupported by an appropriate service response\textsuperscript{10}.

Reviewing the literature, it becomes apparent that there has been an evolving body of research pertaining to older women, and their pathways into homelessness. This is in response to the heightened exposure of the issue in the public realm and the efforts of service providers and not for profits resourcing further research. However, this has not yet translated into adequate public policy responses.

The aim of this review is to:

- Paint a picture of the current policy and funding environment.
- Review current literature on the issue of older women’s homelessness.
- Identify gaps in the literature and data, and offer suggested areas for further research and exploration.
- Provide high level recommendations for possible next steps for service providers and policy makers.

Research questions

- What is the related policy and funding context surrounding older women’s housing insecurity?
- What is the magnitude of the issue and unmet need in the ACT?
- Contributing factors to the older women’s homelessness and housing insecurity.
- What are the current housing options available for older women in the ACT?
- What are appropriate models of housing for older women?
Methodology and process

A literature search was conducted between the 25th of March 2017 and the 26th of May 2017, with inputs provided from the following staff:

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A meeting was initially held with key stakeholders from ACT housing and women’s organisations including: Equality Rights Alliance, ACTCOSS, and YWCA Canberra. Initial discussions centred on the purpose and design of the literature review. An informal interview was also held with YWCA Canberra’s frontline housing staff to discuss priority issues to be explored in the review, as well as local solutions to be documented.

Internet searches were undertaken and key stakeholders (mentioned above) shared literature with the authors. Additionally, bibliographies provided a useful source of further literature. The following keywords and terms were used: older women, homelessness, gender inequality, affordable housing, housing models, social housing.

Literature from the ACT context was prioritised. Evidence from other states and international examples were also referenced where appropriate.

Demographic focus

The Australian Bureau of Statistics (ABS) defines homelessness to include if a person: does not have a ‘roof’ over their head; does not have suitable accommodation alternatives; currently lives in a dwelling that is deemed as ‘inadequate’; currently lives in accommodation that has no tenure or if their initial tenure is short or cannot be extended; or if they do not have control of, and access to, space for social relations\(^1\).

This literature review focuses on older women and is consistent with ACT Shelter’s definition of this category as those who are age 45 years and over (45 to factor in life expectancy of Aboriginal and Torres Strait Islander women) and who:

- Earn low-incomes (bottom 40% of earners)
- Experience homelessness, or housing stress (spending at least 30% of income on housing), and
- Reside in the ACT.

Housing affordability is by nature gendered, and older women particularly suffer its consequences due to the longer term consequences of gender bias, ingrained structural inequality that manifest as an “accumulative poverty”\(^2\).
The affordability of housing in the ACT is particularly problematic for older women. ACT Shelter collected data on women aged 45 years and older who reside in the ACT and found that one in four women in this demographic were experiencing housing stress, by the ‘30/40 rule’. The 30/40 rule is persons in the bottom 40% of income brackets, who spend more than 30% of their take home income on housing expenses – placing pressure on their ability to afford other living expenses. ACT Shelter also found that, in 2011, there were 11,431 women in this demographic on low to median outcomes who did not own their own home; in contrast, there were 7,356 men in this demographic living in these circumstances.

**Current policy and funding environment**

The Parliamentary Agreement between the ACT Labour Party and the ACT Greens outlines plans for improving social housing and housing affordability within the ACT. The ACT Government then committed to a broad range of mechanisms to achieve this, from growing the community housing sector to strengthening specialist homelessness services to support vulnerable groups, including older women.

The ACT Government is reliant on Commonwealth Government funding to support housing and homelessness services. This funding is delivered through two core modalities: the National Affordable Housing Agreement (NAHA), and the National Partnership Agreement on Homelessness (NPAH).

As a result of Australian Government funding cuts to the NPAH and the NAHA, funding to ACT homelessness services has been steadily eroded over the past three years, with $3.7 million cut in 2013-14, and a further $2.2 million in 2014-15.

In response to the reduction in funding, the ACT Government developed a revised costings model to determine the allocation of funding cuts across the ACT’s housing and homelessness sector. This resulted in a reduction in overall funding across the ACT sector. The freeze in indexation imposed in the ACT Government’s 2015-16 Budget has further compounded the funding shortfall, reducing the capacity of services at time of unprecedented demand.

The 2017/2018 Federal Budget confirmed that funding housing and homelessness was secured and will indexed. It was also announced that NAHA and NPAH will be rolled into a new singular fund called the National Housing and Homelessness Agreement (NHHA). The NHHA will ‘target jurisdiction-specific priorities including supply targets, planning and zoning reforms and renewal of public housing stock while also supporting the delivery of frontline homelessness services’.

It is anticipated that the new NHHA will include an additional 375.3 million of Commonwealth funding to those who are homeless and those in need of crises accommodation.

As highlighted by the National Foundation for Australian Women’s gendered analysis of the Federal Budget, that indexation and long term security of funds are much-needed measures, but with no significant increase in funding levels, it is not expected to alleviate the enormous pressure that both public housing and homelessness services are under.
The additional announcement of a bond aggregator was considered a significant step in addressing the current undersupply of community housing stock. The establishment of a National Housing and Investment Corporation (see summary fact sheet) will administer a five year $1 billion facility providing local governments with concessional loans, grants and equity to fund critical infrastructure to deliver more housing sooner.

With both announcements there is much that remains unknown, particularly the likely impacts at State and Territory level.

**Magnitude of unmet need**

Across the literature it is noted that the magnitude of unmet housing need for older women, as for homelessness in general, is difficult to measure quantitatively. The severity and extent of older women's homelessness is generally considered hidden within both the figures and the broader homelessness narrative. For older women particularly, homelessness presents itself more as temporary and complex housing situations, rather than simply ‘sleeping rough’.

The ABS Census of Population and Housing (Census) conducted every five years is a key source of data on homelessness, although the ABS recognises that observing homeless people in any data collection is a challenge in that these people are not captured at all in datasets used to count people generally. The most recent analysis undertaken was in 2011, the release of data in 2017 is highly anticipated to shed further light on this emerging crises.

A common proxy for understanding homelessness has been to measure the unmet demand of SHS (Specialist Homelessness Services). However as noted in an evaluation of the reforms of ACT Specialist Homelessness Service system, data captured by AIHW (Australian Institute of Health and Welfare) has limitations because the unassisted population is not entered into the system.

The same report does note however that a significant increase in people accessing Specialist Homelessness Services (SHS), and changes to the profile of older people. In the ACT, the most striking change in demographic analysis of those accessing SHS was that the proportion of older people increased from 11% to 17%. Although not cross-analysed, there was also an increase in people citing ‘interpersonal relationships’ as a reason for homelessness, a categorisation that includes domestic and family violence, which disproportionately affects women.

Sharam argues that data collection methods for the counting the homeless are overrepresented by men. Street counts tend to not pick up on women who are prone to periodic homelessness, or hide from view as a survival strategy. Sharam’s analysis points to the gendered reality of the service landscape where men have traditionally been the targeted beneficiaries and this may have in turn led to their overrepresentation in data.
ACT Shelter and National Shelter note that women’s underrepresentation in services data is partly due to them not knowing where to go and are not aware of their options\textsuperscript{27}. In fact, many are not aware that their situations mean that they are experiencing, or are on the precipice of, homelessness\textsuperscript{28}.

There are also a number adaptive strategies adopted by older women that may further render their homelessness or housing insecurity as invisible. Robinson and Searby discuss how women ‘self-manage’ homelessness by partnering up or by taking on jobs that includes housing\textsuperscript{29}. Shame and stigma surrounding homelessness also means that they are unwilling to seek help\textsuperscript{30}.

Given the dearth of official data, there is a reliance on qualitative data in the form of case studies and anecdotal accounts from service providers to fill in those gaps. Stories and testimonies from services show that the issue is currently misunderstood, and necessary work should be done to accurately capture the extent of older women in the ACT in need of housing support.

Consultation with women’s services has noted that from a quantitative perspective, the ACT Government could better use the data it receives directly from the services to paint a more accurate and transparent picture of the issue\textsuperscript{31}. The fact that unmet demand is difficult to estimate contributes to the cycle of older women’s invisibility within the homelessness landscape. Without specialised service responses, older women are likely to feel their housing options are limited, and their housing stress and homelessness is not captured by the system\textsuperscript{32}.

### Contributing factors to older women’s housing insecurity and homelessness

Australia has an ageing population with an ever-extending life expectancy that requires an increasingly larger accumulation of resources to support their physical security and wellbeing in retirement\textsuperscript{33,34}. Older Australians with debts and insufficient foundations of savings, assets and superannuation at the time of retirement are more vulnerable than others to experiencing housing stress and homelessness\textsuperscript{35}.

This emerging crisis can be explained in part by an ageing population, as well a corresponding surge of people living alone\textsuperscript{36}. This trend is inherently gendered, given that women are retiring with less superannuation and assets. The Australian Human Rights Commission found that the average superannuation account balance in 2006 was $35 520 for women, compared to $69 050 for men\textsuperscript{37}. The disparity can be broadly understood as the consequence of missed income, missed opportunity, caring responsibilities and the ubiquitous gender bias that accumulates into the net loss of savings and superannuation across a woman’s life span.

Women’s vulnerability in their older years cannot be understood by a disparity in superannuation savings alone. Other financial assets contribute to an older person’s resilience, with home ownership constituting the second biggest asset following superannuation. In 2011
there were 11,431 women in the ACT over the age of 45 on low to medium incomes who did not own their own home. In contrast, there were 7356 men living in the ACT in the same category.

Individual risk factors such as childhood trauma, mental and physical health and domestic violence, can accumulate to result in homelessness\(^{38}\), particularly when compounded by structural forces, such as weak job market conditions and housing affordability issues\(^{39}\). The accessibility of housing and human services is also a crucial factor\(^{40}\). Together, these factors compound to compromise an older women’s resilience against later life shocks\(^ {41,42}\). Shocks are defined as relationship breakdowns, death of a partner, illness, and/or loss of employment.\(^ {43}\)

Indeed, older women who are widowed, divorced, separated or have never been married are found to be more vulnerable to homelessness\(^ {44}\).

A recent report into preventing first time homelessness (2015) found that for those older people with a conventional housing history, true of the older women cohort, risk of homelessness was triggered when a in private rental agreement they were served a notice to vacate, faced a lack affordable housing options or were forced to leave because the design of the home was unsafe\(^ {45}\).

There is a diversity of reasons for older Aboriginal and Torres Strait Islander women experiencing homelessness. For example, Indigenous women experience a much higher rate of family violence and substance use and misuse than non-Indigenous women, which impacts on the lives of women and their families.\(^ {46}\) The factors of age may overlap with multiple disadvantages, including multi-generational crowded housing, poorer health and higher rates of poverty and incarceration. Further, overcrowding might occur due to unique cultural obligations faced by Indigenous women, such as accommodating visitors who are travelling for cultural and family reasons.\(^ {47}\)

Women from cultural and linguistically-diverse backgrounds are found to have specific vulnerabilities: they may lack an awareness of services, or be deterred from seeking assistance from available service models that do not offer culturally-appropriate support.\(^ {48}\)

Once women experience homelessness, it is increasingly difficult for them to regain economic independence. The proportion of ACT clients exiting specialist homelessness services into long-term housing has declined, from 67 percent in 2009 to 49 percent in 2014.\(^ {49}\) AIHW found that, compared to other jurisdictions, the ACT has a much lower proportion of service users exiting specialist homelessness services into the private rental market.\(^ {50}\)

The literature offers both structural and cultural explanations for this trend. Within the US context, Cohen et al. found that there were two statistically significant predictors of homeless women exiting homelessness (‘redomiciled’): Firstly, the women’s perceptions of support available to them, and secondly, the number of community facilities the women had attended.\(^ {51}\)

Cohen et al conclude that the lack of suitable housing options is a significant barrier to older homeless women exiting homelessness, indicated by the high percentage of women who received no housing offers, and by the large number who rejected offers that were made.\(^ {52}\)
The process of ‘shelterisation’ is well documented; whereby a homeless person adapts coping strategies in the form of new behaviours for shelter existence. This is a cultural process that solidifies a person's homeless status, and hinders them in exiting homelessness.\textsuperscript{53, 54, 55}

**Current housing options for older women in the ACT**

The ACT Private Rental market produces rental stress, housing poverty and exacerbates homelessness risk for many Canberrans. High costs of private rental is a significant cause of homelessness in the ACT, both as an underlying driver of housing poverty and an immediate trigger for eviction into homelessness.

Anglicare’s 2017 rental affordability snapshot found that out of the 1,280 private rentals surveyed online, only 24 properties were affordable to single aged pensioners. Besides one granny flat and an apartment listed in Queanbean, the rest were shared houses.\textsuperscript{57} Shared housing arrangements are not necessarily an appropriate or sustainable solution for older women. Sharam found that while older women had lived in shared accommodation on and off, this was a last resort, and not by choice. It was considered to be an unstable, short-term solution for these women.\textsuperscript{58}

Older women report experiencing discrimination and exploitation in the private housing market. The impact is that older women are priced out of the market and often end up in makeshift accommodation options where they become vulnerable to abuse and exploitation.

Many women’s homelessness services are targeted towards domestic and family violence, and are therefore unsuitable for older women who do not necessarily have complex needs or require support.\textsuperscript{59} The Community Services Directorate evaluation found that for women not subject to domestic violence that there was a gap in service delivery, as their eligibility criteria and needs do not align.\textsuperscript{60} Older women facing housing vulnerability may not meet the criteria necessary to access these services and many of them may fear going to transitional options such as refuges because the clientele typically have complex needs.\textsuperscript{61}

To improve access to affordable housing for people on low and moderate incomes, the ACT Government provides an Affordable Rental Scheme. This program is delivered by not-for-profit, non-government organisations, who must offer rents at a fixed rate that is determined independently according to market rental rates. Eligibility for affordable rental housing usually begins where social housing income/asset thresholds cut out. For those accessing the affordable rental scheme, rent is generally calculated at a discounted rate of 74.9 percent of market rent.

Despite the intent of this program, the reality is that for people on low incomes, the 74.9 percent rental rate remains unaffordable. In the context of the ACT where there is a higher than average disposable income, this places upward pressure on the rental market and distorts what is calculated to be "market rent".\textsuperscript{62} So long as it is tied to market rental prices it will most likely result in payments that contribute to the hidden disadvantage in the ACT.
YWCA Canberra has witnessed first-hand the difficulties that low-income Canberrans can face in meeting day-to-day costs under the Affordable Rental Scheme. Many of our tenants are just making ends meet, and it only takes a single event to plunge them into a situation where they cannot pay their rent. Difficulties meeting the rent and basic costs of living can lead to desperation and despair, with some people on low incomes resorting to extreme lengths to obtain money to stay housed.

An ACT Shelter survey undertaken in 2015 found that households in the bottom two quintiles are not only compromising on basic necessities such as food and healthcare costs, but are also increasingly falling prey to high-interest short-term lenders. The constant struggle to pay the rent and other living costs, and the perpetual sense of insecurity that this brings, takes its toll on people’s health, their dignity and well-being.

Housing insecurity is set to increase in the ACT. As ACT Shelter notes, the problem will increase as Australia’s population ages. Since 1996, public housing stock in the ACT generally decreased, and what remains is ageing. This means fewer properties are suitable for older women, who are more likely to have disabilities and require specialised housing services.

A 2009 survey of older women in the ACT by the YWCA of Canberra found that 19.8% of respondents were very concerned about housing options for the future, and 31% were somewhat concerned. Overall, women were worried they would not be able to afford housing appropriate to their physical and financial needs.

**Appropriate models for older women**

Older women’s homelessness is not always easily predictable. Vulnerability can easily occur after later-life shocks, and many older women facing housing vulnerability or homelessness may be experiencing this for the first time. At the same time, each individual woman’s life course will influence her particular experience of homelessness, and older women’s susceptibility covers a variety of demographics within the ‘older women’ cohort.

Different trajectories towards homelessness or housing insecurity therefore calls for more nuanced responses. A variety of solutions are needed to address the issue; at their core these must address the particularly social and economic factors that contribute to older women’s vulnerability. In the long-term, that will mean macro-level efforts are required to remedy the structural inequality including the gender pay gap, superannuation disparity; and addressing violence against women will contribute to women’s housing stability in their later years.

However, immediate actions must address the lack of affordable and appropriate housing solutions for older women that prioritises their need for stable housing; recognising that stable housing is intimately linked with strong social networks, access to healthcare and services, all contributing to better overall health and well-being.
**Permanent housing models linked with supportive services**

As mentioned in the previous review of affordable housing solutions, older women facing housing vulnerability require specialised solutions. They face intersecting vulnerabilities as older people and as women, and face housing instability for a variety of compounding reasons. Simultaneously, the housing and services landscape is difficult to navigate, particularly for those older women experiencing vulnerability for the first time later in life, and whom have never faced the welfare or housing system.

Peterson’s important research into Pathway’s out of Homelessness found that permanent housing that is linked with support services is an appropriate model for older women of all backgrounds. To be successful, the design of these solutions must prioritise to the diverse life experiences of women, their needs and preferences and tailored towards the level of support needed by the residents.

Peterson uses a case study of the Assistance with Care and Housing for the Aged programme (ACHA) to demonstrate how providing holistic support has positive outcomes for older women. Practically, this might include linking people with suitable housing, referring them on to appropriate services and also offering emotional and practical support including assisting clients in the process of moving their belongings. Providing holistic support to older persons navigating the system for the first time is vital.

In a similar vein, ACT Shelter has strongly advocated for a gendered tenancy advice and support services with a similar goal of advocating for and linking older women to services based upon their individual needs. Pointing to the Housing for the Aged Action Group (HAAG) in Melbourne that provides a specialist tenancy service for older people, links advocacy and information and tailors its support towards the specific client and their needs. Funding a specialised service for older women in the ACT would help to raise awareness of the avenues and options available, and conversely, make services more responsive to addressing diverse needs of older women.

**Affordable, appropriate & secure housing**

While there has been an increased focus on older women and pathways into homeless over the past five years, there is still little research available on what housing solutions work for older women.

However, when older women are consulted, there is consistency in their housing preferences. Interviews undertaken by ACT shelter revealed that security of tenure is a critical issue and that independence and living alone are of high importance. They expressed a desire for housing...
programs focused on secure tender, rather than mechanisms that necessarily enabled them to buy their own homes\textsuperscript{7475}.

Secondary dwellings, community land trusts, and co-housing arrangements are autonomous, secure, and are preferable affordable housing solutions for older women\textsuperscript{76}. Below are some of the examples emerging from the literature demonstrating viable models.

*Cooperatives*

Cooperatives have a long history in Europe and have proven to be an affordable model of community housing. The establishment of older women co-housing in the UK OWCH (Older Women’s Co-Housing) is the UK’s first co-housing project designed by, and built for older women, it provides older women with autonomy and independence and avoiding early entry into aged care while striking the balance of private space with community living\textsuperscript{77}.

In the local ACT context, YWCA Canberra’s Lady Heydon House and Betty Searle House are comparable models current examples of preferable solutions; these homes allow 13 older women their own bedroom, sitting room, ensuite and kitchenette, with shared dining and living spaces\textsuperscript{78}.

While not specifically targeting older women, ACT Shelter demonstrates how the Environmental Collective Housing Organisation (ECHO) in North Canberra could provide a useful blueprint for how other housing collectives could come to exist in the ACT\textsuperscript{79}. It is a community housing model that has a 10 year lease with the Housing ACT, with the majority of tenants paying a set rate of 25% of their income. There is an emphasis on tenant participation in the management and upkeep of the premises, with ECHO being managed by a voluntary board who are mainly comprised of tenants\textsuperscript{80}.

*Public private models*

The recent announcement of a bond aggregator is anticipated to have an eventual positive impact on social housing stock. The Government will establish the National Housing Finance and Investment Corporation (NHFIC) to operate an affordable housing bond aggregator with the intention of encouraging greater private and institutional investment and provide cheaper and longer-term finance to registered providers of affordable housing\textsuperscript{81}.

ACT Shelter (2013) examines the positive role of community housing organisations in public renewal, with examples of ‘Innovative Partnering’ with private in the revitalisation of public housing stock. The Newleaf partnership in Bonnyrigg is used as a case study demonstrating how partners as diverse as banks, a developer, a maintenance firm and the state government have partnered to provide tenancy services\textsuperscript{82}. 


In the meantime, local and immediate solutions are required by the ACT Government. Given the current housing affordability crises and depleted social housing stock in the ACT that is unlikely to be addressed in the immediate future, supporting older women’s entry into the private rental market. As noted, older women face significant discrimination in the ACT rental market, and yet anecdotally, housing staff at YWCA Canberra describe older women as being exceptional tenants who pay their rent on time and take immaculate care of the rental properties. Promoting women as preferred tenants\(^\text{83}\) amongst landlords and negotiating terms that provide security of tenure and rent subsidised by the ACT Government could provide a mutually beneficial arrangement for both parties.

*Adaptive Re-use*

Macullam suggests the adaptive reuse of ageing commercial buildings in the ACT civic and town centre could provide a formidable solution to the housing supply shortage, and is one particularly well suited to an ageing population\(^\text{84}\). High rise office buildings are ideal for aging as they are usually conveniently located to employment, services, recreation options, public transport and even learning institutions with a lesser demand for parking and can afford a sense of community and security for residents. Given these characteristics align with older women’s preferences: adaptive re-use could be particularly fitting for the older women cohort.

*Shared Equity Schemes*

Women’s Property Initiatives (WPI) in their study of shared equity housing found that the scheme had demonstrated success internationally for meeting the needs of particular segments of the population, and that with further research could be appropriate for older women\(^\text{85}\).

The shared equity model is appropriate for older women who have assets that may disqualify them from community housing, but do not have enough to purchase a home. The scheme allows women to use their limited assets to essentially purchase shares in a home in partnership with WPI, without the need to take on a mortgage. Their investment gains equity, enabling them to potentially increase their share at a future date.

However, it is important to note that Shared Equity Schemes are only accessible to those women who are in possession of some basic level of assets.

*Areas for further analysis*

Across the literature, the lack of evidence and research pertaining to older women and housing is obvious. Some immediate areas that would help to build evidence and data include:
1. **Gender and age sensitive analysis into the availability and accessibility of services**
   The ACT Community Services Directorate evaluation of the specialist homelessness sector identified that there is a gap in service delivery for women not exiting domestic violence situations, as their eligibility criteria and needs do not align. Gender-sensitive analysis into the availability and accessibility of services for older women would be beneficial in understanding the gaps and to inform future policy development.

2. **Predictive factors of women experiencing homelessness later in life**
   Exploring the predictive nature of factors can help to inform projections for housing need in the ACT, as well as the design of appropriate policies and future planning taken by the Government, bureaucrats and the community sector. A study examining the life course and pathways of ACT women who are homeless or housing insecure would be illuminating. More ambitiously, a longitudinal study could be undertaken to explore key themes of employment, health, relationships, and how those areas interact with housing insecurity.

3. **Quantitative research into how many women are at risk of homelessness in the ACT**
   As identified in the review, most available data is qualitative in the form of case studies and testimonies. Quantitative research into how many women are at risk of homelessness in the ACT would be helpful. Analysis of the new census is due in mid-2017, which will be an obvious starting point. Additionally, drawing on unconventional data sources such as accessing statistics pertaining to the savings/credit/assets of women over 45 would help to paint this picture.

4. **Housing solutions or models that are working for older women**
   While women's preferences for housing is well documented, there is lack of evidence on housing models that are working for older women. The WPI report into shared equity schemes is an important and innovative contribution to this space. Given the ACT Government’s recent announcement to hold an inquiry into housing and infrastructure, as well as the anticipated Housing Summit, further research into the models explored above would be timely.

**Recommendations**

1. **Ensure that older women are consulted in the development of the new National Housing and Homelessness Agreement**
   The potential flexibility of the new NHHA provides the ACT Government with the opportunity to design a programme that is responsive to older women’s needs. Consulting older women in this planning process will be critical to ensuring that this cohort is considered in its design.

2. **Ensure that the new NHHA has an outcome evaluation framework with disaggregated data by age and gender**
The reasons for women’s invisibility in the data is well documented. This should be factored into the design of programme evaluation frameworks going forward. The NHHA is an opportunity to ensure outcomes and collection of data is disaggregated by gender and age.

3. **Introduce a tenancy advice and support service to older women**
   We support ACT Shelter’s recommendation to fund a specialised service for “gendered tenancy advice and support to older women”\(^\text{86}\). This is a critical step in connecting older women with the avenues and options available, as well as ensuring that services meet the diverse needs of older women.
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19 Mercy Foundation, 2014, Page 18
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26 Ibid. page 2
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42 Mission Australia. 2016.
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69 Peterson and Parsell (2014), Page
70 ACT Shelter, 2014 Page 27
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85 Black C and L Ralston, 2015, page 63