



HOMES FOR NSW PLAN SUBMISSION

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Introduction

YWCA Australia ('YWCA') appreciates the opportunity to collaborate with Homes NSW and provide feedback to help shape the Homes for NSW Plan. We share Homes NSW's understanding that the creation of this agency and the development of the Plan represent a pivotal opportunity to address the State's housing and homelessness challenges. This Plan will play a critical role in guiding Homes NSW as the central agency responsible for delivering social housing, affordable housing, key worker housing, and homelessness policies and programs across New South Wales (NSW).

We appreciate this opportunity to provide Homes NSW with a deeper understanding of our organisation and its operations in addressing and securing the State's housing and homelessness challenges and opportunities respectively. As a leading national provider of gender-responsive housing solutions, we aim to highlight the gendered dimensions of this crisis, particularly its impact on women and gender-diverse people in NSW. These two key aspects will serve as the foundation for our responses to the ten questions posed by Homes NSW to help shape the Homes for NSW Plan.

This submission has been developed through collaboration between YWCA's Advocacy and External Affairs team, YWCA leadership from the Sydney Metro and Southwest regions, and our Development and Housing teams.

About YWCA Australia and our NSW Operations

Our National Operations and Impact

YWCA is a national not-for-profit organisation that has specialised in supporting women for over 140 years. With over 200 employees across 17 locations, YWCA provides housing, support services and leadership pathways that enable women, gender diverse people and their families to find stability and feel safe and secure, so they can build the future they want. We are experts in gender-responsive housing and homelessness solutions and our work and services across Australia are informed by women and gender diverse people with lived experience.

As the leading national women's housing provider in Australia, YWCA Australia's dedicated community housing subsidiary, YWCA National Housing, is a Tier 2 Community Housing Provider with a rapidly growing portfolio of 470 social and affordable homes nationally. We provide nearly 125,000 nights of affordable accommodation to women and gender diverse people every year.

We are also pioneering an innovative model in the Australian housing sector: [YWCA's Women's Housing Framework](#). This framework outlines best practice for designing, acquiring, and operating housing specifically for women. Informed by both women-centred research and the lived experiences of those facing housing insecurity and homelessness, the framework empowers housing providers with actionable steps to support residents in achieving not just positive housing outcomes, but also individual

outcomes leading to personal growth. The Framework focuses on addressing the root cause of housing insecurity for women; by targeting the structural drivers of housing insecurity it serves as a foundation to improve gender equality in all other areas.

Building from the YWCA's Women Housing Framework, we have launched the [Women's Liveability Assessment](#) - an online audit tool that helps community housing providers, governments and other housing providers to ensure their housing meets the unique needs of their women residents. The Women's Liveability Assessment covers four key domains of impact – Safety and Security, Participation and Connection, Agency and Health and Wellbeing, drawn from YWCA's Women's Housing Framework and our Impact Framework. It prompts housing providers to consider how residents are supported after experiencing trauma, assisted to build skills and access employment opportunities and ensure housing meets residents' family and caring responsibilities.

Our NSW Operations and Impact

Operating throughout [New South Wales](#), specifically in the Northern Rivers, Sydney Metro, and Southern NSW areas, we deliver a diverse array of tailored services and programs aimed at combating housing insecurity, homelessness, and domestic and family violence. Our evidence-based programs target the underlying causes of housing challenges and are gender-responsive, addressing the unique needs and structural barriers faced by women and gender diverse people experiencing housing insecurity and homelessness. These services are critical to communities across NSW, often providing a lifeline to women, gender diverse people and their families who are facing domestic and family violence and/or housing insecurity and homelessness.

The **Specialist Homelessness Services in Sydney** provides client-focused, flexible, trauma-informed case management to clients who are experiencing or at risk of homelessness. The Homelessness Services programs operate in several regions across Sydney including the inner city, inner west, Eastern suburbs, and Bankstown areas. There are several support programs targeting families, individuals, senior women, and youth:

- **The Inner-City Rapid Response Homelessness Service:** supports young people, women, men and families who are experiencing homelessness in the City of Sydney local government area.
- **The Sydney Young Parents Program (SYPP):** provides flexible and holistic case management support, and safe, medium-term supported accommodation to young parents in the Inner West who are pregnant, have children in their care, or are working towards restoration, and experiencing homelessness.
- **The Sydney Homelessness Early Intervention Service:** supports families at risk of homelessness within the City of Sydney, Inner West and Canterbury areas to stabilise tenancies or secure safe and sustainable alternate accommodation, using holistic case management support and brokerage.
- **The Southeast Sydney Homelessness Early Intervention Service:** provides holistic case management and brokerage support to young people, individuals and families at risk of homelessness in the Southeast Sydney area.

- **The Inner West Youth Homelessness Service:** provides support services for young people, who are homeless or at risk of homelessness and reside in, or have a strong connection to, the Inner West of Sydney.

In addition to the above listed programs in Sydney, YWCA Australia provides an array of programs and services across NSW. These programs are funded by the NSW Department of Communities and Justice as well as Commonwealth and philanthropic funding sources.

- **YWCA Early Intervention Program (formerly, Find Your Possible Program)** is an Early Intervention Child and Family Support Program which supports young parents who are pregnant and/or have accompanying children aged 0-12 years old, with connections to the Sydney, St George and Randwick areas.
- The **Family and Domestic Violence Services in the Shoalhaven and Wingecarribee** offers wrap-around support for adults and their children who are experiencing or have experienced domestic and family violence. The team provides individualised case management; information and education on family and domestic violence; safety planning; and support to access security upgrades to remain safe in a home of the client's choice; advocacy, assistance and referrals to other services including legal and counselling services.
- The **Youth Frontiers Mentoring Program** utilises the power of role models to make a difference for young people aged 10-17 years who are in contact with the youth justice and child protection systems.
- The **Kids 4 Life** provide age-appropriate activities and opportunities for connection for families in the Northern Rivers region. The supported playgroups promote healthy relationships between parents and carers, children, and their communities. We offer two general playgroups for all families, and one Goori group for Aboriginal and Torres Strait Islander families that offers culturally safe and specific activities. Its success is evident in high participation numbers and community engagement.
- The **Communities for Children** program in Lismore and Murwillumbah develops and facilitates a whole of community approach to support and strengthens local service networks that contribute to child and family wellbeing. Communities for Children collaborates and partners with local service providers to improve access for children and their families to the support they need to thrive. Our partners provide prevention and early intervention programs that support positive family functioning, safety, and child development. We identify and support initiatives that celebrate and value children and families and support them to lead in their community.

All our programs are designed to tackle the root causes of housing insecurity for women and gender diverse people, leading to stable and secure housing outcomes.

Drivers of Housing Insecurity and Homelessness for Women and Gender Diverse People

In the development of the Homes for NSW plan, it is essential that Homes NSW recognises and responds to the reality that the housing and cost-of-living crises in NSW are disproportionately affecting women and gender-diverse people, who face unique barriers to accessing affordable and stable housing. Housing insecurity for these groups is exacerbated by systemic economic inequalities, including the gender pay gap, caregiving responsibilities, and pervasive issues of domestic and family violence (DFV). These factors contribute to the troubling statistic that women make up 60% of those accessing homelessness services.¹ Without targeted policy and budgetary interventions, this trend will continue to drive housing inequality, pushing women further into economic precarity.

Domestic and family violence is the number one driver of homelessness for women and children in Australia

Almost half (45%) of all women and girls seeking homelessness assistance nationally identify family and domestic violence as a cause.² In NSW, three-quarters of specialist homelessness services clients who are identified as experiencing family and domestic violence are women.³ These statistics evidence a trend related to the dual crises of gender-based violence and homelessness for women and gender diverse people in NSW.

Evidence shows that a particularly impacted cohort are younger women in NSW aged 25 to 34 years old. Both nationally and in NSW the largest cohort of women experiencing homelessness are younger women aged 25 to 34 years old.⁴ National data also shows that the primary cohort of specialist homelessness services clients who have experienced family and domestic violence are also younger women aged 25 to 34 years old.⁵

In our recent research with Swinburne University of Technology, we investigated the lived experience of housing insecurity, homelessness risk and homelessness experienced by a diverse range of young women and gender diverse people across Australia aged 18 to 30 years old. That report is titled, "[We've Been Robbed: Young](#)

¹ Australian Institute of Health and Welfare (2023) Specialist Homelessness Services Annual Report 2022–23, www.aihw.gov.au, accessed October 2024.

² Homelessness Australia, *Homelessness and Domestic and Family Violence: State of Response Report 2024*, (last updated March 2024), available at: <https://homelessnessaustralia.org.au>.

³ Australian Institute of Health and Welfare Table, Specialist homelessness services 2023–24 - Supplementary tables - Historical tables SHSC 2011–12 to 2023–24, See specifically: 2023–24 Data from HIST.FDV: Clients who have experienced family and domestic violence, by sex, states and territories(a), 2011–12 to 2023–24 (last updated, 11 Dec 2024) available at: <https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-annual-report/data>.

⁴ Australian Bureau of Statistics, Estimating Homelessness: Census 2021, See specifically: National 'Total Homeless Persons' data in Table 1.12 HOMELESS OPERATIONAL GROUPS AND OTHER MARGINAL HOUSING, Sex by age of person, 2021(a); and NSW 'Total Homeless Persons' data in Table 4.2 HOMELESS OPERATIONAL GROUPS AND OTHER MARGINAL HOUSING, New South Wales, Sex, by age of person, 2021(a)(b).

⁵ Australian Institute of Health and Welfare, Specialist homelessness services annual report 2022–23, Figure FDV.1: Key demographics, SHS clients who have experienced family and domestic violence, 2022–23 (web report last updated 13 February 2024), available at: <https://www.aihw.gov.au/reports/homelessness-services/shs-annual-report-22-23/contents/clients-who-experienced-fdv>.

[Women and Gender Diverse People's Housing Experiences and Solutions.](#)" The research confirms the extreme difficulties in accessing housing; the unaffordable and insecure nature of housing; the sub-standard and unsafe conditions of housing; and the uniquely gendered safety concerns associated with housing. Lack of access to safe, secure, affordable and long-term housing puts young women and gender diverse people at heightened risk of housing insecurity and homelessness and impacts their everyday lives and ability for future planning.

In addition to youth, we know that other priority populations of women and gender diverse people are at higher risk of domestic and family violence and homelessness. This includes women and gender diverse people with intersectional identities and experiences who face gender-based violence compounded by other forms of discrimination and systemic barriers. These groups include Aboriginal and Torres Strait Islander communities, LGBTIQ+SB communities, people living with disability, older people, people from culturally and racially marginalised backgrounds, and people being released from custody.

We note in particular:

- Aboriginal and Torres Strait Islander women face higher rates of domestic violence and homelessness. First Nations women are 34 times more likely to be hospitalised due to violence than non-Indigenous women,⁶ and almost 80% of specialist homelessness services First Nations clients are women and children.⁷
- LGBTIQ+ people experience homelessness at a younger age due to higher levels of family rejection, conflict, and violence, and are twice as likely to experience homelessness.⁸
- Only six per cent of people living with disability who are experiencing or at risk of homelessness are getting the long-term housing they need.⁹ This is particularly alarming for women living with disabilities, with over one third reporting experiences of intimate partner violence.¹⁰

YWCA Australia's Advocacy Team, together with YWCA's Young Women's Council, recently had the opportunity to brief the NSW Women's Advisory Council on the report's findings and recommendations. As a result of this briefing, YWCA will work with the NSW Women's Advisory Council to provide advice to the government in relation to its whole-of-government strategy for housing and homelessness responses, particularly with respect to their impact on women and gender diverse people in New South Wales.

⁶ Australian Institute of Health and Welfare, Family, domestic and sexual violence – Aboriginal and Torres Strait Islander people, (last updated 9 December 2024), available at: <https://www.aihw.gov.au/family-domestic-and-sexual-violence/population-groups/aboriginal-and-torres-strait-islander-people>.

⁷ Australian Institute of Health and Welfare, Specialist Homelessness services 2023-24, See specifically Table INDIGENOUS.1: Clients and support periods, by Indigenous status and by age and sex, 2023-24 (Indigenous clients total of women, and boys and girls under 0 – 17 years old).

⁸ 2014 General Social Survey in Australia; Street Smart Action Against Homelessness, LGBTIQ+ Homelessness, (8 February 2023), available at: <https://streetsmartaustralia.org/homelessness-and-lgbtiqa/>.

⁹ Disability Advocacy Network Australia, People with disability are missing out on homes, (14 December 2023), available at: <https://www.dana.org.au/>.

¹⁰ Women with Disabilities Victoria, Violence against women with disabilities – factsheet three, available at: <https://www.wdv.org.au/>.

Responses to the Homes NSW Questions to Inform the Homes for NSW Plan

YWCA Australia takes this opportunity to provide feedback to the questions posed by Homes NSW in the longer discussion paper to inform the Homes for NSW Plan.

1. Does the vision that ‘Everyone has access to a decent home and support if they need it’ provide an appropriate system-wide purpose and direction for all providers to work towards over the next 10 years?

YWCA Australia values “[t]he aim of Homes NSW to provide homes and services to people and families in housing need, and to build a sustainable system that recognises housing as a human right.”¹¹ We highlight the fact that there is international precedent for human-rights based approaches to housing strategy which have immense success in eradicating long-term homelessness. In 2008, Finland introduced a human-rights based strategy, Housing First which was aimed at eradicating long-term homelessness. Through partnerships between different levels of government as well as non-government organisations, the policy has reformed the Finnish housing system. Since 2008, under the Finnish human-rights based national housing policy, the number of people experiencing long-term homelessness in Finland has decreased by 68%.¹²

We further value the element of the vision that everyone is entitled to access to housing. We note that the human right to housing is embedded (amongst other international treaties to which Australia is signatory) in Article 11 of the International Covenant on Economic, Social and Cultural Rights (‘ICESCR’) - the right to an adequate standard of living, including housing. We note that Article 11 must not be read in a silo, but in the context of the full treaty and the international obligations of that right. Per article 3 of ICESCR, Australia has the obligation to ensure the equal right of men and women to the enjoyment of the right to housing amongst the other rights in the ICESCR. In addition, Australia has the obligation to guarantee the right to adequate housing without any kind of discrimination, including on the basis of sex or gender identity in accordance with article 2, paragraph 2 of the ICESCR.¹³ In summation, under international law, Australia has an obligation not only to protect a human right to housing but to ensure that right is equally enjoyed and guaranteed for people of all genders.

As already highlighted in this submission, the evidence is indisputable that in New South Wales the housing crisis is gendered. The causes and drivers of homelessness for

¹¹ Homes NSW, Homes NSW: Discussion paper – long, first published December 2024 (Department reference number: AF24/17109) available at: nsw.gov.au/homes-nsw, 5 (“Homes NSW Discussion Paper”).

¹² Finnish Government, Ministry of the Environment, Report: Homelessness can be eradicated by 2027 with close cooperation (10 February 2023), available at: <https://valtioneuvosto.fi/en/-/1410903/report-homelessness-can-be-eradicated-by-2027-with-close-cooperation>.

¹³ For further guidance see the comments of the United Nations OHCHR, Special Rapporteur on the right to adequate housing, Women and the right to adequate housing, (last accessed: 8 August 2024), available at: <https://www.ohchr.org/en/special-procedures/sr-housing/women-and-right-adequate-housing>. The United Nations Economic and Social Council Committee on Economic, Social and Cultural Rights has specifically stated that gender identity is recognised as a prohibited ground of discrimination under the International Covenant on Economic, Social and Cultural Rights. See Committee on Economic, Social and Cultural Rights, General Comment No. 20 – Non-Discrimination in Economic, Social and Cultural Rights (art. 2, para. 2, of the International Covenant on Economic, Social and Cultural Rights, UN Doc E/C.12/GC/20 (2009).

young women, women and gender diverse people must be recognised and responded to in the Homes for NSW Plan.

In conjunction with the vision, there must be distinct recognition that access to housing and associated supports for everyone, means responding in a tailored manner to the distinct needs of people – including the gender-responsive solutions required for women and gender diverse people.

We encourage Homes NSW at this critical juncture of the new establishment of the agency, to be bold in its vision to reverse and end homelessness in New South Wales. We encourage Homes NSW to go a step further towards a human-rights based vision that responds to the leading cause of homelessness for women and their children in Australia, which is domestic and family violence:

“Everyone has access to stable housing, which is adequate, safe and secure and support if they need it.”

2. To achieve the vision, Homes NSW has proposed three priority areas for action:

- 1. Customer-driven service**
- 2. More and better homes**
- 3. A system that works**

Are these the right priorities to achieve the vision?

The three priorities proposed by Homes NSW—Customer-Driven Service, More and Better Homes, and A System That Works—form a strong foundation for achieving the vision of addressing housing insecurity and homelessness in NSW. These priorities address the core challenges in housing policy and practice. However, their success depends on the adoption of principles that ensure equity, inclusivity, and gender-responsiveness in their design and implementation. Below, we outline how each priority can be strengthened to ensure it meets the complex and diverse needs of those most affected by housing insecurity, particularly women and gender-diverse people.

1. Customer-Driven Service

The focus on customer-driven service is an important step towards improving outcomes for individuals and families in need of housing support. However, this priority must be underpinned by a person-centred, intersectional, and trauma-informed approach to truly address the lived experiences of those seeking assistance. A customer-driven model must move beyond a transactional view of service delivery to one that focuses on the unique needs and preferences of each individual. This requires genuine partnerships between government and the customers they support, built on trust, mutual respect, and a commitment to understanding personal circumstances.

A trauma-informed approach is particularly critical for women and gender-diverse people experiencing housing insecurity, many of which that are seeking housing supports are survivors of domestic and family violence. The design and delivery of

services must acknowledge the prevalence of trauma and actively work to create safe and supportive environments that avoid re-traumatisation. An intersectional framework is also essential, recognizing the overlapping forms of disadvantage that affect individuals, such as gender, age, race, and socioeconomic status.

For women and gender-diverse people, a customer-driven service must also account for the inadequacy of existing support systems. Young women represent the largest cohort of women experiencing homelessness and face significant barriers to accessing appropriate supports. The absence of a continuum of care for young women and gender diverse people transitioning into adulthood leaves many at risk of exploitation or further harm. Services must work to bridge this gap, providing targeted and tailored support to ensure safe and secure housing outcomes.

2. More and Better Homes

The second priority, More and Better Homes, appropriately recognises the centrality of supply to addressing the housing crisis in New South Wales. However, the definition of “better homes” must go beyond a focus on quality and maintenance to include considerations of safety, appropriateness, and inclusivity. For this reason, Homes NSW must adopt a gender-responsive housing approach that ensures the design, allocation, and location of housing meets the specific needs of women, gender-diverse people, and their families.

Gender-responsive design is critical to addressing the unique challenges faced by women and gender-diverse people, particularly survivors of domestic and family violence. Homes must be safe, accessible, and trauma-informed, providing not only shelter but also the stability and security needed to rebuild lives. The **YWCA Women’s Housing Framework** offers a model for integrating these principles into housing design and development.

In addition to safety and appropriateness, Homes NSW must commit to setting explicit targets for housing investment in women and gender diverse people. For example, allocating at least 25% of funding under the 10-year plan towards meeting the housing needs of women, gender diverse people and their families would demonstrate a meaningful commitment to addressing intergenerational inequalities and systemic barriers. These targets and commitments must extend beyond and continue the priority in the Building Homes for NSW program whereby half of all new public homes will go to women and children fleeing violence. In addition to a specific target, a gendered lens must be applied across the Homes for NSW Plan to ensure that no part of the strategy disadvantages women or gender diverse people and that in all possible areas additional measures are adopted to uplift housing security and homelessness supports for women and gender diverse people.

A focus on sustainability and energy efficiency should also be central to this priority, ensuring that new and existing homes are designed to reduce power bills for residents, providing long-term affordability while also minimising environmental impacts. There must also be minimum health and safety conditions to ensure that people within non-market housing are safe from known and common environmental harms, such as mould and extreme heat or cold.

3. A System That Works

The success of the third priority, A System That Works, depends on adopting a whole-of-systems approach that integrates housing policy with broader social, economic, and environmental contexts. Housing insecurity and homelessness are not isolated issues but are deeply interconnected with other systems, including healthcare, education, and employment. Addressing these challenges requires cross-sector collaboration and a commitment to breaking down silos between services.

This priority must also incorporate an intersectional framework to ensure that systemic responses account for the overlapping disadvantages faced by marginalised groups. A Housing First approach, which prioritises immediate access to stable housing without preconditions, should be a cornerstone of this priority. Stable housing provides the foundation upon which individuals can address intersecting challenges, such as trauma, mental health issues, and economic insecurity.

It is imperative that when adopting Housing First principles that there are not unintended consequences of de-prioritising housing for women who are technically housed and with a roof over their heads but are experiencing domestic and family violence within their homes. The principles of Housing First by the NSW government must be around housing which is safe, secure and stable as the top priority. This must extend to protect women and their children – who are driven to homelessness in Australia because of the primary driver of domestic and family violence.

Finally, a focus on prevention is critical to creating a system that works. Early intervention strategies must be prioritised to reduce the flow of individuals and families entering homelessness. These strategies should address the gendered drivers of housing insecurity, such as domestic and family violence, and work to provide holistic and long-term solutions.

Additional Considerations

While the proposed priorities are well-conceived, they lack a gender-responsive lens that is essential to achieving equitable and effective housing solutions. Housing insecurity and homelessness affect women and gender-diverse people in unique and deeply gendered ways, and without explicit focus, the strategy risks perpetuating systemic inequities.

As aforementioned, both nationally and in NSW the largest cohort of women experiencing homelessness are younger women aged 25 to 34 years old.¹⁴ Younger women are also the primary cohort of specialist homelessness services clients who have experienced family and domestic violence.¹⁵ This data confirms that many young women are survivors of domestic and family violence, and that the housing system often fails to provide the safety and stability they need. Unsafe or inappropriate housing options frequently trap women in cycles of homelessness or forces them to return to

¹⁴ Australian Bureau of Statistics, Estimating Homelessness: Census 2021, See specifically: National 'Total Homeless Persons' data in Table 1.12 HOMELESS OPERATIONAL GROUPS AND OTHER MARGINAL HOUSING, Sex by age of person, 2021(a); and NSW 'Total Homeless Persons' data in Table 4.2 HOMELESS OPERATIONAL GROUPS AND OTHER MARGINAL HOUSING, New South Wales, Sex, by age of person, 2021(a)(b).

¹⁵ Australian Institute of Health and Welfare, Specialist homelessness services annual report 2022–23, Figure FDV.1: Key demographics, SHS clients who have experienced family and domestic violence, 2022–23 (web report last updated 13 February 2024), available at: <https://www.aihw.gov.au/reports/homelessness-services/shs-annual-report-22-23/contents/clients-who-experienced-fdv>.

environments where they are at risk of further harm. A gendered lens is also about ensuring that housing policy and practice actively promotes gender equality. This involves designing housing that meets the specific needs of women and gender-diverse people, delivering services that are trauma-informed and intersectional, and allocating resources in ways that address systemic inequalities. Access to safe, secure, and affordable housing is fundamental to achieving gender equality and must be at the heart of the Homes NSW strategy.

By embedding a gender-responsive approach into all three priorities, Homes NSW can ensure that its vision is not only achieved but also creates lasting and meaningful change for women and gender-diverse people in New South Wales. This is an opportunity to lead with bold and inclusive policies that recognise housing as a human right and a critical driver of equality and opportunity.

3. What does great engagement with tenants and communications look like?

Embedding Client-Led and Client-Focused Principles

At YWCA Australia, we believe that great engagement with tenants and communities begins with embracing a client-led, client-focused approach. A key example is YWCA Australia's Women's Housing Framework, which integrates lived experience into housing design, acquisition, and operations, ensuring that housing solutions address the unique needs of women and gender-diverse people.

Further, it is crucial for Homes NSW to collaborate with specialist women's organisations like YWCA Australia to design and deliver gender-responsive housing solutions. This ensures tenant-focused approaches are informed by the voices and expertise of those who understand the gender-specific barriers to achieving housing security.

Housing With Supports

Great tenant and community engagement includes not only housing provision but also access to holistic supports that ensure tenancy sustainment and longer-term housing stability. The Plan must include a focus on co-designed, trauma-informed, and person-centred housing models that provide wraparound services tailored to the unique needs of women and gender-diverse people. These models connect tenants with education, employment, healthcare, and social supports, fostering a sense of community and reducing barriers to full societal participation.

Lived Experience as a Core Principle

YWCA Australia strongly supports the principle of "Nothing about us without us." Engagement must include meaningful involvement of individuals with lived experience in decision-making processes. Evidence consistently shows that incorporating the perspectives of tenants and frontline experts results in better outcomes, fostering a compassionate, comprehensive approach to housing solutions.

For *Homes NSW*, this means establishing mechanisms that consistently integrate tenant voices into policy design and service delivery. For example, YWCA Australia's Women's Housing Framework draws on lived experience insights to address systemic challenges and ensure that housing meets the real-world needs of tenants.

Housing as Essential Infrastructure

Great engagement also requires recognising housing as critical and essential infrastructure, comparable to health and education systems. This perspective underscores the importance of placing housing at the centre of public policy and prioritising investment in long-term, sustainable housing solutions.

YWCA Australia advocates for best-practice housing developments that integrate safety, security, and proximity to services. Social and affordable housing must be located near employment, education, and healthcare opportunities, enabling tenants to achieve stability and independence. Additionally, green spaces and community networks play a crucial role in fostering well-being for women and gender-diverse people.

Service System Integration

To truly engage tenants and communities, Homes NSW must address the interconnected systems that drive housing insecurity, including transitions from care, justice, and healthcare systems into homelessness. The frequent link between gender-based violence and housing insecurity highlights the urgent need for better collaboration between government agencies, service providers, and community organisations.

YWCA Australia advocates for a dedicated, integrated approach to prevent fragmented responses to housing challenges. This includes co-location of health, justice, and social support services to ensure tenants receive the holistic care they need.

Sustaining Tenancies and Rapid Rehousing

A key component of successful engagement in the housing and homelessness system is ensuring that tenants can sustain their housing in the long term. Homes NSW should prioritise sustaining tenancies and rapid rehousing models that adopt tailored, gender-responsive approaches to meet the specific needs of women and gender-diverse people. Research by the Australian Housing and Urban Research Institute (AHURI) underscores the effectiveness of sustaining tenancy programs, which have demonstrated success rates above 80%. This evidence highlights the significant potential for long-term stability and improved outcomes when tenants are supported to maintain their housing.

Investing in homelessness prevention and tenancy sustainment is not only the right thing to do from a human rights perspective but also the most cost-effective approach. AHURI's research shows that providing homelessness and supporting services yields substantial cost offsets for governments. For instance, the cost of health and justice services is higher for clients of homelessness programs compared to the general population. By preventing homelessness, governments can reduce these costs, as individuals who avoid periods of homelessness report lower utilisation of such services. Within every client group, preventing homelessness translates to financial savings and improved societal outcomes.¹⁶

¹⁶ Australian Housing and Urban Research Institute (AHURI) 2008, The cost-effectiveness of homelessness programs, AHURI Final Report No. 119.

Embedding human rights principles, fostering lived experience participation, and delivering holistic supports through integrated service systems are essential to achieving great tenant and community engagement.

4. Have we missed any challenges or possible reforms around customer-driven service?

YWCA Australia acknowledges the significant challenges faced by the NSW Government in managing the homelessness system, particularly in the context of increasing demand and resource constraints. We commend the development of a Community and Customer Engagement Strategy, and the reconsideration of complaints and appeals policies as outlined in the Homes NSW plan. These steps are critical for improving customer-driven services within the sector.

One significant area for improvement lies in embedding trauma-informed principles across all aspects of the housing and homelessness service system. Homelessness services deal with some of the most vulnerable individuals and families in our community, making it critical that processes and interactions are designed with sensitivity to trauma. We urge Homes NSW to adopt a leadership role in embedding these principles across its systems and processes. As the largest public housing agency in NSW, Homes NSW has an opportunity to model best practices and set a standard of excellence for the sector.

Additionally, we underscore the importance of investing in the sector's workforce to ensure they are equipped to deliver high-quality services. This involves addressing workforce challenges such as vicarious trauma, burnout, and the need for ongoing professional development. Adequate investment in the sector is essential to maintaining a skilled and supported workforce capable of facilitating effective, customer-driven service delivery that benefits both clients and service providers.

5. What changes do you think we should make to improve social housing access and tenancy management?

Our organisation has identified two key areas for reform to enhance access to social housing and improve tenancy management. The first focuses on improving and streamlining government processes to ensure appropriate housing is provided to women and gender-diverse people who are experiencing or at risk of homelessness. This reform also aims to better support the efforts of community housing providers and specialist homelessness services.

Specialist homelessness services providers are challenged in their roles in attaining appropriate housing for their clients due to system barriers. The primary identified barriers are the long wait times and family to provide appropriate housing options for clients – specifically safe and secure housing which is suitable for women and their children. Another barrier that has been identified is administrative failures which re-start and delay the work of specialist homelessness services providers in attaining housing for their clients.

Another barrier to social housing access for specialist homelessness service providers lies in the current use of data and client outcome reporting in service delivery. While YWCA Australia recognises the importance of data and accountability in managing these processes, we urge Homes NSW to collaborate with the specialist homelessness services workforce to assess and improve existing data collection methods. We recommend shifting the focus from measuring program outputs to prioritising client outcomes. This approach would align with trauma-informed practices, ensuring more compassionate, client-centred support, and reflect a human rights-based approach to housing and homelessness service delivery.

Ultimately, by improving standards and processes for government engagement with specialist homelessness services providers and data recording for housing and homelessness outcomes, there will be a significant uplift in improvement to social housing access and tenancy management.

The second area for reform focuses on ensuring that the homes provided to women and gender-diverse people are safe, secure, and meet the needs of both the individuals and their families. We are aware of instances where housing offered did not meet basic standards of safety, suitability, or cultural sensitivity. In one example, a First Nations young woman was offered a property where she faced immediate racial hostility from neighbours. In other cases, clients have been placed in housing with unsafe or unsuitable conditions, such as unhygienic environments, or homes lacking essential amenities like baths or showers.

To address these issues, we recommend that Homes NSW and the Homes for NSW Plan prioritise processes that assess and ensure the appropriateness of housing before allocation. By implementing stronger checks and embedding human rights standards into housing policies, the government can ensure that the housing offered promotes both personal and cultural safety while supporting the overall well-being of those in need.

In light of the critical issues identified, YWCA Australia strongly recommends that Homes NSW embeds the [YWCA's Women's Housing Framework](#) and utilises the [Women's Liveability Assessment](#) in the operations of the NSW government and within the Homes for NSW Plan. As aforementioned, the Women's Housing Framework is an innovative model in the Australian housing sector which empowers housing providers with actionable steps to support residents in achieving not just positive housing outcomes, but also individual outcomes leading to personal growth. The Women's Liveability Assessment builds off the Women's Housing Framework and is an online audit tool that the NSW government can use and set as a standard to support housing providers to ensure their housing meets the unique needs of their women residents. The Women's Liveability Assessment covers four key domains of impact – Safety and Security, Participation and Connection, Agency and Health and Wellbeing, drawn from YWCA's Women's Housing Framework and our Impact Framework. It prompts housing providers to consider how residents are supported after experiencing trauma, assisted to build skills and access employment opportunities and ensure housing meets residents' family and caring responsibilities.

6. How do we make sure the homes we build in the next few years are the right ones to meet the current urgent need, and the needs of our customers in the long term?

YWCA Australia appreciates the immediate and long-term vision of Homes NSW to ensure that the homes that are built in the next few years are both the right ones to meet the current urgent need, as well as the needs of customers in the long term. As recognised by Homes NSW, the known barrier is that “the new homes built will not meet existing levels of demand, let alone anticipated future demand.”¹⁷ Whilst we recognise the investments that have been committed to for growth of non-market housing by the NSW government through the Building Homes for NSW program, this investment must be seen as a first step towards a trajectory of ongoing, increased investment which responds to both existing levels of demand, and anticipated future demand.

Beyond the vision stated by Homes NSW, there is the stated more holistic objectives to have “houses built soon”, “where people want to live and that are sustainable”, and “appropriate for people who live in them.”¹⁸ We value that Homes NSW is working with the Commonwealth Government, and also partnering with Community Housing Providers to secure funding under the Housing Australia Future Fund to deliver new social and affordable housing.¹⁹ YWCA Australia as a Tier 2 Community Housing Provider extends our ongoing support to partner with Homes NSW to deliver social and affordable housing, as well as key worker housing in New South Wales.

Through this submission we have canvassed the evidence-basis of a current urgent need and a long-term systemic need to provide gender-responsive housing and housing supports to women and gender diverse people in Australia who are experiencing or at risk of housing insecurity and homelessness. Specialist homelessness services are stretched to support increasing numbers of people at risk, with fewer homes available to transition clients into. The consequence is longer periods of homelessness, greater repeat homelessness, and services forced to prioritize crisis response over prevention. To break this cycle, the NSW Government must commit to the implementation of tailored and targeted investment where it is needed most. Within the Homes for NSW Plan there must be embedded targets towards the allocation of all new homes built specifically for women and gender diverse people, and women and gender diverse people led families.

Our specific recommendations towards increasing gender responsive social and affordable housing supply in the Homes for NSW Plan are as follows:

- A significant and sustained investment in social and affordable housing, with dedicated targets for all new allocations of housing for women, gender diverse people, and their families. This housing investment must be coupled with specialist homelessness services and domestic and family violence services supports.

¹⁷ Homes NSW Discussion paper, 11.

¹⁸ Ibid 15.

¹⁹ Ibid.

- We note that the Building Homes for NSW program has a strong target for over 50% of new homes built prioritised for women and children escaping domestic and family violence.²⁰ There must be gender specific targets within the full term of the Homes for NSW Plan. These targets and commitments must extend beyond and continue the priority in the Building Homes for NSW program.
- Additional funding for community housing providers to cover the upfront costs for development proposals such as costs associated with materials and labour, overhead, insurance and holding costs.
- Support community housing providers to deliver specialist housing to priority cohorts through funding the establishment of a Community Housing Futures Program (CHFP) in New South Wales. The program would make funding opportunities more accessible beyond Tier 1 providers and enhance the capability and capacity of Community Housing Providers (CHPs) to increase the supply of social and affordable housing across the state.
 - The CHFP would deliver targeted support to Tier 2, Tier 3, and emerging Tier 4 CHPs through the provision of growth-related training, education, and tools. It would also facilitate access to grants for specialist business advisory services, enabling these providers to strengthen their operational frameworks and unlock new opportunities for growth – with a specific focus on Community Housing Providers with specialisations in target areas and community representation. This program has proven successful in Queensland, stimulating greater investment and enabling smaller and mid-tier CHPs to play a more significant role in addressing housing need.
- Consider innovative homelessness responses:
 - We support the asks of the Constellation Project – a multi-sector collaboration seeking to end homelessness within a generation – who have developed a National Framework for the implementation of Mandatory Inclusionary Zoning (MIZ). Through the introduction of mandated affordable housing outcomes, MIZ could supply between 11,000 to 54,000 additional affordable homes in Sydney by 2036 at no additional cost to the NSW government.²¹ MIZ has the added benefit of increasing locational equity, creating diverse and inclusive communities, and providing a pipeline of housing access for key workers who fall into the “missing middle” of being priced out of the private rental market but not being eligible for social supports. MIZ can diversify the approach of the NSW government towards increasing quality affordable housing for its constituents which is medium to long-term, and which can prevent cycles of homelessness.²²

²⁰ Homes NSW Discussion paper, 5 and 16.

²¹ See 'The Constellation Project website – What is MIZ', available at: <https://theconstellationproject.com.au/projects/mandatory-inclusionary-zoning/> (last accessed 23 December 2024). Based on 2021 data, with calculations based on 2036 development figures and based on a range of 2% - 10% of all new dwellings developed will be allocated as non-private.

²² For further information see the Constellation Project website, as above and The Constellation Project, 'Driving smart solutions' submission to the development of the National Housing and Homelessness Plan, available at: <https://engage.dss.gov.au/> (last accessed 23 December 2024).

- Other innovative responses include the Victorian response towards co-living and driving down the cost per dwelling; higher density buildings; and building housing and community infrastructure in regional places to make them more attractive as places to work and live.
- Consider other jurisdictional approaches, for example in Victoria, to reform planning processes. Specifically, to streamline planning pathways and to reduce burdens within planning processes.

Our specific recommendations towards examining affordable housing and key worker housing:

YWCA recommends a review of the eligibility criteria for social and affordable housing. In tandem with increasing social and affordable housing stock, there should be an increase in the financial threshold that a person can be earning to be eligible for non-market housing, specifically affordable housing. Community Housing Provider rental prices for affordable housing are typically set at 70% of the market rate, with rent capped at 30% of a tenant's income. However, due to the high cost of housing and the ongoing cost-of-living crisis, it is often the case that individuals on low incomes find that 30% of their income aligns with or can support 70% of the market rate. If the person's income was high enough, then it would be unlikely that they would be eligible for non-market housing in the first instance. The consequence of this is that without government subsidy that payment gap falls to Community Housing Providers to cover, which has flow on impacts for Community Housing Providers in delivering supply. To respond to this discrepancy there needs to be reflection of the eligibility criteria for non-market housing and/or increases in government subsidy to accommodate for the gap.

In terms of key worker housing in NSW, there is a strong case for building and offering key worker housing to the specialist homelessness workforce as a priority group, to ensure that the workforce facilitating the system are themselves secure in housing. It is important to note the risks of housing insecurity for the specialist homelessness workforce in NSW, especially in Sydney and metro areas, due to cost-of-living pressures in NSW and the housing crisis in Australia.

In addition to the pressures faced from the cost-of-living and housing crises, the specialist homelessness workforce are facing barriers tied to:

- Lack of financial stability and certainty due to commonly being on rolling contracts tied to short-term and piecemeal funding;
- Operating in an industry which has risks of vicarious trauma; and,
- In particular, for the workforce operating in metro areas – having to remain in high-cost urban areas in order to continue to their work as specialist homelessness workers in those areas.

7. What changes should we make to ensure strong and sustainable estate communities?

YWCA Australia welcomes the recognition within the Homes NSW Discussion Paper of the challenges faced by housing providers, particularly in sustaining tenancies and managing capacity within homelessness and domestic and family violence (DFV) services. Strong and sustainable estate communities require a comprehensive and multi-faceted approach that addresses these challenges while fostering safety, stability, and opportunity for tenants.

Sustaining Tenancies Through Adequate Support

The YWCA Women's Housing Framework emphasises the importance of supporting tenants beyond simply providing a house. Safe, secure, and affordable housing must be underpinned by tailored support structures designed to sustain tenancies and build community. Housing providers are increasingly expected to go beyond the role of landlord, acting as case managers and support workers without additional funding to meet these demands.

The [YWCA Women's Housing Support Program](#) demonstrates the effectiveness of investing in tenancy sustainment programs. By embedding support workers within housing programs, tenants are supported to build life and home management skills, navigate challenges, and connect with other support services as needed. This investment not only helps tenants maintain their housing but also reduces the risk of homelessness, which is significantly more costly for both the individual and government systems. The program's transparent and streamlined communication structure between different parts of the organization further ensures efficiency and positive outcomes for tenants.

Reforming Tenure Policies for Long-Term Stability

We note broader concerns regarding fixed-term tenures and the "three strikes" approach. While fixed-term tenures may encourage some tenants to transition out of social housing, this approach risks being counterproductive for those experiencing trauma or instability. For many vulnerable clients, the looming uncertainty of fixed-term tenures could exacerbate trauma, creating further barriers to stability and progress. Instead, a trauma-informed and person-centred approach is needed, which provides adequate support to tenants to build skills and transition at their own pace.

Pathways should be created to help tenants move from social to affordable housing, private rental, or homeownership where appropriate. Dedicated support workers, such as those in the YWCA Women's Housing Support Program, can play a critical role in helping tenants achieve independence, gain confidence in managing their homes, and navigate the broader housing market.

Addressing Regional and Place-Based Needs

Sustainable communities require customised, place-based solutions that account for the unique challenges of regional and remote areas. A one-size-fits-all housing approach often fails to meet the needs of women and gender diverse people, particularly in regions where access to essential services, transport, and community support is limited.

YWCA Australia strongly advocates for incorporating gender-responsive design principles into housing developments. This approach enhances safety, accessibility, and well-being while ensuring housing meets the unique needs of the communities it serves.

8. What actions would make the biggest impact in creating a housing and homelessness system that works?

YWCA Australia commends Homes NSW for its recognition of the need for system-wide reform and its commitment to working collaboratively with the sector to achieve better outcomes for people experiencing housing insecurity and homelessness. Below, we outline key actions that we believe will have the most significant impact in creating a housing and homelessness system that works.

Safe Housing First

While the Housing First model is essential, it must go beyond simply placing a roof over someone's head. For women and children escaping DFV, safety must be paramount. Immediate access to safe housing that is trauma-informed, adequately funded, and supported by wraparound services is critical. Without this, women may remain in unsafe homes or experience cycles of secondary homelessness.

System Reform for Equity

The current competitive tendering processes, particularly for core and cluster housing, often disadvantage smaller, women-led organisations. A more equitable approach would include tiered tendering processes that prioritise gender-specific expertise and ensure that women-led organisations have a fair opportunity to secure contracts.

Streamline Processes and Reduce Administrative Burden

YWCA Australia welcomes Homes NSW's acknowledgment of the significant administrative burdens faced by service providers and its commitment to addressing these challenges through improved contracting arrangements. To create a more efficient and sustainable system, these principles should be extended to include both homelessness services and housing build contracts. Providing multi-year funding contracts is essential to ensuring stability for service providers, enabling them to plan effectively and measure the long-term impact of their work. Equally important is ongoing collaboration with sector peaks. Meaningful engagement and co-design processes are crucial to ensuring that policies and programs are informed by lived experience and the expertise of those working directly with affected communities. These actions will help streamline processes, reduce inefficiencies, and enhance the overall effectiveness of the housing and homelessness system.

Prevention-Focused and Locally Tailored Solutions

Shifting the focus from crisis-driven responses to prevention is critical for creating a sustainable system. Prevention not only reduces demand on crisis services but also leads to better outcomes for individuals and communities. Expanding funding for homelessness prevention services, such as tenancy sustainment programs, reduces the long-term costs associated with homelessness.

9. What actions would make the biggest impact to increase self-determination for Aboriginal people and families across the NSW housing and homelessness system?

In addressing this important question, YWCA Australia defers to the expertise and guidance of the National Aboriginal and Torres Strait Islander Housing Association (NATSIHA). As the peak body representing Aboriginal and Torres Strait Islander housing interests, NATSIHA is best positioned to provide insights and recommendations on actions that would have the greatest impact on improving housing outcomes for Aboriginal and Torres Strait Islander peoples and their families. YWCA Australia supports Homes NSW in continuing to engage meaningfully with NATSIHA and other Aboriginal-led organisations to ensure that policies and programs are co-designed with and for Aboriginal and Torres Strait Islander communities.

We recognise the ongoing work by Homes NSW in this area, including the establishment of the Aboriginal Strategy Unit and the development of an Anti-Racism and Reconciliation Plan. These initiatives are critical steps toward achieving better housing outcomes for Aboriginal and Torres Strait Islander communities.

10. What are the risks and opportunities in developing an agreed set of system-wide measures to track progress against the priorities and objectives?

Developing an agreed set of system-wide measures to track progress against the priorities and objectives of the NSW housing and homelessness system presents both significant opportunities and inherent risks. YWCA Australia advocates for the inclusion of gender-responsive targets, processes, and impact assessments to ensure that the system effectively addresses the specific needs of women, young people, and marginalised communities.

The opportunity lies in developing measures that go beyond numerical targets for housing stock or placements. Homes NSW's recognition of the importance of a gendered lens and the need to measure impacts for specific client cohorts, such as women and young people, is a positive step forward. For these measures to succeed, they must be designed in consultation with a diverse range of stakeholders, including community housing providers (CHPs), specialist homelessness services (SHSs), and people with lived experience. This can be facilitated through the establishment of an Advisory Council that includes representatives from these groups. Such a council would ensure that measures are grounded in lived realities, bridge the gap between domestic violence and homelessness support services, and promote sector collaboration.

Another critical area for improvement is the reconceptualization of funding amounts and processes to address systemic limitations. Adequate funding is necessary to support the collection of meaningful data, implement monitoring frameworks, and achieve the desired outcomes. Homes NSW's efforts to align with national funding agreements and explore best practices from other jurisdictions are commendable. However, there must be a concerted focus on ensuring that funding processes are equitable and enable gender-responsive approaches.

YWCA Australia strongly supports Homes NSW's emphasis on measuring impacts rather than outputs. This approach should include robust gender impact analyses to assess how policies and programs affect women and young people differently. Measures should also address geographic disparities by differentiating between metro and non-metro regions to ensure that regional and remote communities are not left behind.

In addition to aligning with government processes, Homes NSW should leverage existing community housing sector practices to measure impact. Collaboration across the sector will foster consistency and alignment, creating a shared understanding of progress and priorities. This approach should include actionable and specific measures that reflect both systemic goals and the lived experiences of those accessing services.

YWCA Australia commends Homes NSW for its commitment to addressing these challenges and urges continued collaboration with stakeholders to refine targets, measures, and indicators. By embedding a gendered lens and prioritising impact analysis, Homes NSW has an opportunity to lead transformative change, ensuring that the housing and homelessness system meets the diverse needs of all people across New South Wales.

Concluding Remarks

YWCA Australia thanks Homes NSW for the invitation to work with the agency to provide feedback to inform the Homes for NSW Plan. For any questions relating to this submission or for any requests for further consultation, please contact the following YWCA representatives:

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