



***DRAFT NSW
HOMELESSNES STRATEGY
SUBMISSION***

February 2025



YWCA
Australia

Opening Doors.
Building Futures.

Introduction

YWCA Australia ('YWCA') thanks the NSW Government and Department of Communities and Justice for the invitation to work with the Department to provide feedback to inform the 10-year NSW Homelessness Strategy 2025-2035.

We take this opportunity to inform DCJ further about our organisation and our operations in NSW to address the State's housing and homelessness crisis as a leading national provider of gender-responsive housing and homelessness solutions. We also use this submission to highlight the gendered nature of the housing and homelessness crisis for women and gender diverse people in NSW. These two parts will set the context for our substantive response to the NSW Government's draft strategy.

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 a 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 practices 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 Federal Election Campaign – *Safe Homes, Equal Futures*

In the context of the 2025 Federal Election, we are running the campaign [Safe Homes, Equal Futures](#) as our call to action for the next Federal government and all political parties. At its heart is a five-point plan to address Australia's urgent housing crisis and ensure gender-responsive solutions for women and gender-diverse people. It highlights the critical link between gender equality and housing security, recognising that safe homes are the foundation of equal futures. Our [five point plan](#) to advocate for the delivery of safe homes and equal futures for women and gender diverse people is based on the following:

1. Priority 1: Increase the Supply of Safe, Secure and Affordable Housing for Women, Gender-Diverse People, and Their Families
2. Priority 2: Increase Investment in Regional Housing for Women, Gender Diverse People, and Their Families
3. Priority 3: Increase and Sustain Funding for Gender-Responsive Homelessness and Family and Domestic Violence Services
4. Priority 4: Ensure Young Women and Gender-Diverse Voices Shape Housing Policy
5. Priority 5: Enhance Renter Experience and Improve Rental Affordability.

Whilst we are advocating for these changes at a Federal level for the Federal election, we also call on the NSW government to prioritise these objectives as a pathway to responding to the crisis of homelessness and housing insecurity for women and gender diverse people in NSW.

Our NSW Operations and Impact

YWCA Australia operates across New South Wales, delivering tailored services and programs in the Northern Rivers, Sydney Metro, and Southern NSW regions. Our work addresses housing insecurity, homelessness, and domestic and family violence, with a focus on gender-responsive, evidence-based solutions. We target the root causes of housing challenges, prioritizing the unique needs and structural barriers faced by women and gender-diverse people. These services are a lifeline for communities, providing critical support to women, gender-diverse individuals, and their families experiencing domestic violence, housing insecurity, or homelessness.

In Sydney, our Specialist Homelessness Services (SHS) offer client-focused, flexible, and trauma-informed case management to individuals and families experiencing or at risk of homelessness. Our programs operate across multiple regions, including the inner city, inner west, Eastern suburbs, and Bankstown, and are designed to support diverse groups such as families, individuals, senior women, and youth. Through formal partnerships with organisations like Bridge Housing, Women's Housing Co, Launchpad, St George Housing, Haymarket Foundation, Mission Australia, Wesley Mission, and Youth Off The Streets, we secure access to transitional accommodation and community housing for clients across all programs.

- **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 tailored support to young people who are homeless or at risk of homelessness and either reside in or have a strong connection to the Inner West of Sydney. Delivered in partnership with Youth Off The Streets, this service offers critical assistance to vulnerable youth. Additionally, as part of our Rapid Response contract, we manage a ten-room bed-sit facility, with case management services provided in collaboration with Women's Housing Co. This integrated approach ensures comprehensive support for young people in need, helping them achieve stability and long-term housing outcomes.

While our partnerships and programs have significantly improved medium-term housing outcomes for clients, securing additional transitional housing often requires us to provide extended case management to facilitate long-term housing solutions. This additional support is not currently funded under our SHS contracts, creating a gap in service delivery. To address this, we advocate for increased base funding to ensure sustainable, long-term housing outcomes for vulnerable populations.

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 a Targeted Early Intervention (TEI) 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.

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

In the development of the 10-year NSW Homelessness Strategy, it is essential that DCJ recognises and responds to the reality that the housing and cost-of-living crises in New South Wales 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.

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 As recognised in the draft Strategy, the current NSW service system is under pressure with demand increasing with a 42% increase of people experiencing homelessness in NSW who have experienced family and domestic violence. These statistics evidence a trend related to the dual crises of gender-based violence and homelessness for women and gender diverse people in NSW.

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

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

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>.

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 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

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-lgbtq/>.

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/>.

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 in NSW.

Responses to the Draft 10-year NSW Homelessness Strategy 2025-2035

YWCA Australia has several recommendations on the draft 10-year strategy to ensure that the blueprint is viable to achieve the shared vision to make NSW a place where homelessness is rare, brief and not repeated because people have a safe home and the support to keep it.

Section 1: Guiding Principles of the Strategy

We commend the Department for embedding principles to guide system improvement, commissioning, service design and delivery, resource allocation and any future homelessness and housing investment over the life of the Strategy. We support all principles listed and note our advocacy to embed housing as a human right and our service delivery which prioritises prevention, service design informed by lived experience, and housing first principles which include prioritisation for women and gender diverse people who are not appropriately housed or are at risk of homelessness because of domestic, family and sexual violence. We note however a significant absence in the current list of guiding principles of the draft is a commitment to gender responsive principles being embedded in policy and practice.

Recommendation 1: Gender responsive principles are embedded in policy and practice and are accounted for with defined and assessable targets.

While the proposed principles 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.

A gendered lens ensures that housing and services policies and practices actively promote 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 strategy.

By embedding a gender-responsive approach into its principles, the NSW Government has greater chances of success towards ensuring that the homelessness responses of New South Wales create lasting and meaningful change for women, gender diverse people and their families. 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. The principles must be embedded with defined actions, targets and responsibilities. There must be clear funding allocations and assessable outcomes on the implementation of those allocations.

Including this principle will also strengthen other principles currently drafted for the Strategy, namely:

- Prevention is prioritised,
- Housing First Principles are embedded in policy and practice, and
- People with lived experience inform service design.

There is an epidemic of hidden homelessness for women and gender diverse people across Australia and in New South Wales. As such, a significant means of preventing homelessness in New South Wales is ensuring that gender-responsive policies and practices are embedded to ensure that women, gender diverse people have access to homes that are safe, secure and affordable to prevent homelessness from occurring in the first place. Where housing insecurity or homelessness does occur, women and gender diverse people who may not be roofless but who are unsafe at home or who are experiencing secondary or tertiary forms of homelessness must also be protected under housing first principles. Finally, it is essential that service design but also policy design are informed by women, gender diverse people and youth with lived experience of homelessness.

Section 2: Strategy Focus Areas

We support the proposed outcomes within the Strategy towards making homelessness in NSW rare, brief and not repeated. Within this section, we have outlined several recommendations to support the structure of the Strategy to achieve this goal as a roadmap for gender-responsive homelessness solutions in NSW for the next ten years.

Homelessness is rare

Outcome 1: Wherever possible, homelessness is prevented from happening in the first place, making it rare.

1.1 People can get and keep a safe and affordable home

Recommendation 2: Commit to increasing Specialist Homelessness Services (SHS) baseline funding by at least 30% as an immediate measure and commit to ensuring that 10% of all housing in New South Wales is social and affordable housing

We strongly support the principles of the Strategy. However, without a substantial increase in investment to deliver more social and affordable housing and support homelessness services to meet growing need in New South Wales, government will not be able to achieve its stated objectives. Whilst we value the investment through the Building Homes for NSW program, this funding must be increased and sustained to achieve the principles outlined for the 10-year Strategy and to achieve the overarching goal of making homelessness in NSW “rare, brief and not repeated.”

As highlighted in the Homes NSW discussion paper for the Homes for NSW Plan, “Even with historic levels of funding from the NSW Government and investment from the Commonwealth Government, the new homes we build will not meet current demand, let alone future demand.” This challenge extends beyond housing supply to homelessness support services, as the two are deeply interconnected and cannot be addressed in isolation.

We support the calls by Homelessness NSW for a 30% uplift in baseline funding to specialist homelessness services program funding and a commitment to increasing social housing as a proportion of all housing in New South Wales. The NSW government is at a critical juncture to invest in addressing the housing and homelessness crisis with this 10-year plan, which requires investment and funding to match the scale and proportion of the crisis. Investments into the specialist homelessness services sector and the supply of social and affordable housing in NSW must be recurrent and sustained long-term.¹¹

As a priority, the NSW government must address the impacts of the housing crisis experienced by our most vulnerable populations which are driven by market failure and an erosion of social housing over several decades. If the market is not able to deliver secure and affordable housing for low income and vulnerable people, a significant and rapid increase in non-market housing is required.

Gender-responsive services

In the process of increasing funding and supply, there must be allocated targets to ensure that groups made vulnerable to housing insecurity and homelessness are accounted for. Specifically, that women, gender diverse people and their families can get and keep a safe and affordable home.

It is important that funding is prioritised to support prevention and early intervention programs, and integrated service models for women and for women and gender-diverse people experiencing housing insecurity and homelessness, drawing on international best practices. Funding should be allocated to projects that combine safe, affordable housing with tailored, gender-responsive supports, prioritising initiatives that incorporate integrated supports, specialist homelessness and domestic and family violence services, long-term housing pathways, and partnerships between sectors to deliver holistic solutions. Funding should also be provided to support providers of specialist gender-responsive

¹¹ Homelessness NSW, Latest News: What the NSW budget means for homelessness services, available at: <https://homelessnessnsw.org.au/what-the-nsw-budget-means-for-homelessness-services/>

homelessness and domestic and family violence services to support women, gender diverse people and their families experiencing domestic and family violence to have perpetrators removed from their homes and to remain safely in their homes.

Recommendation 3: Include clear targets for gender-responsive housing, including a commitment to increase funding to deliver an additional 5,000 social and affordable homes for women and gender diverse people

We acknowledge the growing recognition of the importance of gender-responsive housing, particularly through the prioritisation of new public and social homes for victim-survivors of domestic and family violence. However, we urge the NSW Government to take this commitment further by embedding gender-responsive principles into the 10-year Strategy, supported by clear targets and dedicated investment. Such measures are vital to transforming the homelessness and housing sector from a crisis-response model to one that prioritises prevention and long-term solutions.

To address the urgent need for gender-responsive housing in New South Wales, we call for the allocation of funding to deliver an additional 5,000 social and affordable homes specifically for women and gender-diverse people. This initiative must extend beyond existing commitments, including those outlined in the Building Homes for NSW plan. This additional investment is critical to creating sustainable pathways out of crisis and transitional accommodation, as well as addressing housing insecurity more broadly for women, gender-diverse people, and their families across NSW.

Recommendation 4: Increase Regional Homelessness Services and Housing Supply

The Strategy presents a critical opportunity for the NSW Government to reassess funding distribution across the state and prioritise essential support for specialist homelessness services and housing supply in regional areas. To ensure equitable outcomes, it is vital that clear targets are established to allocate funding specifically to regional communities. Equally important is the need for the NSW Government to prioritise long-term social benefits in funding assessments. This includes addressing broader regional needs such as housing security, tenant wellbeing, cultural safety, and community impact, alongside traditional "value for money" criteria. By taking this approach, the Strategy can deliver meaningful and sustainable improvements to housing outcomes in regional New South Wales.

Recommendation 5: Establish a Community Housing Futures Program (CHFP) in NSW

To prioritise prevention and gender-responsive housing solutions for women and gender-diverse people, the NSW Homelessness Strategy should establish a dedicated grant-based funding model for the community housing sector. This model would provide additional funding to cover upfront costs associated with development proposals, including materials, labour, overheads, insurance, and holding costs.

A key avenue to achieve this is through the creation of a Community Housing Futures Program (CHFP) in New South Wales, modelled on the successful initiative in Queensland. The CHFP would make funding opportunities more accessible beyond Tier 1 providers, enhancing the capability and capacity of Tier 2, Tier 3, and emerging Tier 4 Community Housing Providers (CHPs) to increase the supply of social and affordable housing across the state.

The program would deliver targeted support through growth-related training, education, and tools, while facilitating access to grants for specialist business advisory services. This would enable CHPs to strengthen their operational frameworks and unlock new opportunities for growth, with a specific focus on providers specialising in gender-responsive housing and community representation.

The success of the CHFP in Queensland demonstrates its potential to stimulate greater investment and empower smaller and mid-tier CHPs to play a more significant role in addressing housing need. By adopting a similar model, NSW can ensure the delivery of tailored housing solutions that meet the unique needs of women and gender-diverse people, while fostering a more inclusive and resilient community housing sector.

Recommendation 6: Invest in Tenancy Sustainment Programs, including the YWCA Australia Women's Housing Support Program

As part of a holistic response to ending homelessness, the NSW government must increase its investment in tenancy sustainability programs for people going from homeless to housed – especially in for people who have experienced chronic or repeat cycles of homelessness and/or who experience co-morbidities.

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.

Recommendation 7: When increasing the supply of affordable housing, review the NSW Affordable Housing Policy and consider additional funding for Community Housing Providers to ensure that women, gender diverse people and their families on low incomes are not excluded from accessing affordable housing

There is a significant issue within Australia of the “missing middle” of women and gender diverse people who are at risk of or are becoming homeless because they are earning an income but cannot compete in the ever-increasing private rental market. Expanding the supply and access to affordable housing can support address the needs of this cohort and prevent homelessness from occurring.

We note the common situation for Community Housing Providers that rental prices for affordable housing are set at around 75% of market rate, with the entitlement to charge a maximum of 30% of a person’s income. Because of the cost of housing and the cost-of-living crisis, it is frequently the case that 30% of a person’s income – who is on low income – will be able to afford 75% of market rate. If the person’s income was high enough to meet 75% of market rate, then it would be unlikely that they would qualify 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, or that people in need of affordable housing are excluded.

In addition to increasing funding for Community Housing Providers for the delivery of affordable housing, it is also important that the NSW Government undertakes a review of the NSW Affordable Housing policy. Specifically, an analysis of affordable housing and whether the current policy and approach to affordable housing is actually responding to the lowest two income quintiles. From this analysis, new approaches which are evidence-based can be adopted to ensure that the government’s affordable housing policy is meeting need and intended purpose.

Recommendation 8: When increasing the supply of key worker housing, prioritise housing for key workers in the specialist homelessness and domestic and family violence services sectors

There is opportunity to draw focused attention and prioritisation of key worker housing in NSW, for frontline workers across specialist homelessness and DFV workforce, as a means 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.

In 2017, the Social Policy Research Centre at UNSW Sydney published a report prepared for Domestic Violence NSW, Homelessness NSW and YFoundations, *“Workforce Issues in Specialist Homelessness Services.”*¹² That report collected data for 72 organisations providing specialist homelessness services in NSW. The research confirms that the funding provided to organisations delivering specialist homelessness services does not account for increasing costs and does not cover the gap between pay levels in non-profit and government organisations. The report highlighted the insecurity in funding arrangements based in short-term contracts and funding limitations. These factors hampered employment security and the ability to pay for better wages to retain and build a highly skilled and stable workforce. One specialist homelessness services provider stated that:

“It is terrible to have such excessive demand for supporting our clients, yet not to be able to offer job security, or be able to employ more people to meet the demands that we are faced with - it is a recipe for burning out the faithful staff we have.”¹³

Recommendation 9: Implement NSW Rental Reforms and Enhance Renter Affordability and Tenure Security

Alongside increasing housing supply and expanding homelessness services, the NSW Government must prioritise rental reforms to prevent homelessness. Stronger renter protections will improve housing security, ensuring that renters can maintain stable and affordable housing. However, legislative changes alone are not enough. To ensure these reforms are effective, we recommend:

- **Improving property standards** – Many rental properties in NSW suffer from structural issues, such as mould, poor insulation, and inadequate heating and cooling. Minimum property standards must be strengthened to ensure all renters live in safe and healthy homes.
- **Assessing the effectiveness of rental subsidies and financial relief programs** – Programs like bond loans and rental subsidies should be reviewed and directed towards those who need them most to maximise their impact in preventing housing insecurity.

We acknowledge the important work of the NSW Rental Commissioner in advancing rental reforms and encourage continued leadership in strengthening tenant protections, improving property standards, and ensuring effective compliance. The Commissioner’s role is critical in making rental laws work for tenants and addressing systemic issues in the private rental market.

¹² Cortis, N. and M. Blaxland (2017). *Workforce Issues in Specialist Homelessness Services* (SPRC Report 08/17). Sydney: Social Policy Research Centre, UNSW Sydney. <http://doi.org/10.4225/53/592628989f0ab>, 3.

¹³ Ibid 15.

1.2 People at risk of homelessness are identified early and linked with the right supports, 1.3 People know where to get information and support to prevent homelessness

Recommendation 10: Build Capacity and Connectivity

To prevent homelessness and ensure women, gender-diverse people, and their families receive timely support, the Specialist Homelessness Services (SHS) sector must be properly resourced and funded to operate effectively. Without systemic investment in service capacity and integration, early intervention efforts will fail, and people at risk will continue to fall through the cracks.

A whole-of-system approach is needed to break down silos and strengthen linkages between SHS providers, housing, homelessness, social services, and universal service systems. This requires:

- **Systemic reform and long-term investment in prevention** – Funding must not only support crisis response but also enable new and expanded prevention initiatives that stabilise at-risk tenancies across social, affordable, and private rental markets, including engagement with real estate agents.
- **Sufficient and sustainable funding for SHS providers** – Increased connectivity and referrals are meaningless if SHS providers lack the resources to respond. The sector is already operating at capacity, and without significant funding increases, it will be unable to meet growing demand.

SHS providers have the expertise to identify people at risk of homelessness, yet current funding constraints force them to prioritise crisis response over prevention. Funding structures and agreements must shift to allow the sector to work proactively keeping people housed and reducing the pressure on emergency services.

Homelessness is brief and not repeated

Outcomes 2 and 3 - When homelessness does occur, people are quickly connected to housing and the supports they need, and people do not experience multiple episodes of homelessness

2.1 People's needs are quickly identified, and they are referred to the right support

We agree with the priorities and measures proposed by the NSW Government to ensure that people's needs are quickly identified and that they are referred to the right support. It is essential that there is a central referral pathway which is clear in NSW and that the government's policies, guidelines and principles of intake and assessment are made more cohesive.

2.2 People get safe crisis accommodation with appropriate support when they need it

Recommendation 11: Temporary accommodation must be accompanied by tailored support services – particularly for women, gender-diverse people, children, and young people.

In addition to improving access to safe crisis accommodation, there must be a corresponding increase in access to appropriate, person-centred support services. This is especially critical for individuals and families with complex needs who are staying in temporary accommodation. Practical examples of such support include trauma-informed care, family-centred case management, and access to health and wellbeing services.

Through the NSW Homelessness Strategy, there must be a commitment to strengthening the safety net for young people to ensure temporary accommodation is safe, inclusive, and responsive to their unique needs. This can be achieved by providing youth-specific supports and ensuring compliance with the National Principles for Child Safe Organisations.

Key Considerations for Funding and Implementation

- **Crisis Accommodation Funding** - Funding for support services within new crisis accommodation must be additional to the existing Specialist Homelessness Services (SHS) base funding. This funding must be recurrent and long-term to ensure sustainability.
- **Protect Crisis Sector Funding** - Funding for the crisis accommodation sector must not be diminished or reallocated from other critical services.
- **Reform of Temporary Accommodation (TA)** - We welcome the department's commitment to reforming the temporary accommodation system. However, during this transition, vulnerable groups – including women, gender-diverse people, and children – must continue to receive adequate support. This support should be funded through SHS providers with additional, dedicated resources.
- **Separate and Distinct Funding Streams** - Any additional funding for new crisis services must be separate and distinct from existing SHS funding. It should not come at the expense of other providers or services.
- **Support Services for Crisis and TA** - Funding for support services within crisis accommodation and temporary accommodation must be provided over and above base funding. This includes dedicated funding for trauma-informed care, case management, and other essential supports.
- **Direct Funding for Providers** - The department should work directly with the sector to ensure funding reaches providers efficiently and effectively, enabling them to deliver high-quality, responsive services.

2.3 People are supported out of homelessness into longer-term housing with tailored support, 3.1 People with complex needs can access comprehensive, longer-term support so they do not experience repeat homelessness and 3.2 People have strong connections to their community that protect against repeat homelessness

As discussed throughout this submission, YWCA Australia as a Community Housing Provider supports women, gender diverse people and their families out of cycles of homelessness and into safe, secure and long-term housing. We encourage the NSW government to invest in the expansion and implementation of our programs and frameworks State-wide to support a genuinely gender-responsive approach to addressing homelessness. Two core approaches which have been highlighted throughout this submission include the YWCA Women's Housing Framework and the Women's Support Program. It is essential that these gender-responsive principles form part of the Homelessness Action Plans and that dedicated funding is attached to the actions to achieve this.

3.3 People have access to housing that meets their changing needs across their lifespan

Recommendation 12: The NSW Homelessness Strategy 2025-2035 must adopt a whole-of-government approach, ensuring alignment with other relevant plans and coordinated action across State and Federal agencies.

The draft NSW Homelessness Strategy acknowledges the intersection and interdependence of various NSW and Commonwealth plans, as illustrated in its schematic (Figure 4). However, it is critical that this alignment is not only acknowledged but actively embedded into the Strategy and its subsequent action plans.

Ensuring access to safe, stable, and appropriate housing for all people in NSW – both now and across their lifespan – is a key priority for the NSW Government. To achieve this, genuine coordination must occur between agencies and across related plans and strategies at both the State and Federal levels. This is especially important for plans and agencies focused on ending violence against women and children and advancing gender equality.

The draft Strategy proposes aligning monitoring and reporting with the National Agreement on Social Housing and Homelessness (2024–2029) and the upcoming National Housing and Homelessness Plan. While this is a positive step, we recommend extending this alignment to other critical NSW and Commonwealth strategies and reforms, including:

- The National Plan to End Violence Against Women and Children 2022-2032
- The NSW Women's Strategy
- The NSW Health Strategy for Preventing and Responding to Domestic and Family Violence 2021-2026
- Working for Women – A Strategy for Gender Equality

By embedding these alignments into the Strategy, the NSW Government can ensure a cohesive, integrated approach to addressing homelessness and its intersecting issues, particularly for women, children, and families. This will strengthen the impact of the Strategy and ensure it delivers meaningful, long-term outcomes for vulnerable populations.

Recommendation 13: Ensure Ongoing Involvement and Assessment of Relevant Stakeholders in the Development of Action Plans and the Roll-Out of the Strategy

Through the lifecycle of the Strategy, it is essential that the relevant stakeholders are at the centre of finalising the Strategy, delivering the Strategy and assessing the success of the Strategy. As a leading provider of gender-responsive housing and homelessness services across Australia, it is important that YWCA Australia representatives from NSW can contribute to this process. An important juncture for this will be in the two commissioning horizons of the strategy, with the first from 2026 – 2031 with the Homes NSW Commissioning Plan 2026 – 2031.

It is also important that the voices of people with lived experience of housing insecurity and homelessness, as well as the intersectional voices of young women and gender diverse people who are disproportionately impacted by this issues are engaged in this process. YWCA Australia has strong networks of young women and gender diverse people, and people with lived experience who are also able to support this process.

Recommendation 14: Ensure that the adopted outcomes framework is realistic, pragmatic, and does not place undue burden on the Specialist Homelessness Services (SHS) sector without addressing systemic issues such as housing supply and affordability.

While we welcome the development of an outcomes framework and improved data collection processes to better capture the true extent of homelessness for women and gender-diverse people in NSW, it is critical that these measures are meaningful, achievable, and within the control of SHS providers. For example, outcomes such as reducing homelessness or increasing housing stability depend heavily on the availability of affordable housing – a factor outside the direct control of SHS providers. Without adequate housing supply, such outcomes cannot be realistically achieved, and providers should not be held accountable for systemic failures beyond their scope.

We also advise that any changes to data collection, reporting requirements, or outcomes measurement must be accompanied by increased funding and capacity-building support for the SHS sector. This includes investment in enabling infrastructure, administrative support, and adjustments to service delivery models to ensure providers can meet new requirements without compromising service quality or overburdening staff.

Furthermore, the Framework must be accompanied by a transparent and inclusive process that engages SHS providers in its development and implementation. As a leading provider of gender-responsive housing, specialist homelessness services, and domestic and family violence services, YWCA

Australia's NSW representatives would welcome the opportunity to contribute to the development of this Framework and the associated report card.

Concluding Remarks

YWCA Australia thanks the NSW Government and the Department of Communities and Justice for the invitation to work with the Department to provide feedback to inform the 10-year NSW Homelessness Strategy 2025-2035. For any questions relating to this submission or for any requests for further consultation, please contact the following YWCA representatives:

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