



National Housing and Homelessness Plan

Submission from the Community Housing Disability Network

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19 October 2023

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1. About Us

1.1. Community Housing Industry Association

CHIA is the peak body representing not for profit community housing organisations (CHOs) across Australia. Our 150+ member CHOs are regulated, not-for-profit, organisations that accommodate very low, low and moderate income Australians unable to secure adequate housing in the private market. They manage 120,000 homes, including dwellings in their own ownership, as well state/territory government-owned properties. They invest in developing new homes, in improving existing dwellings, and in enhancing tenant services. Any financial surpluses are ploughed back into these activities rather than being distributed to shareholders.

The largest not for profit CHOs manage between 5,000 and 11,000 homes each, with 102 responsible for 96% of all community housing, with an average portfolio size of over 2,000 homes.

CHO-managed homes account for over 25 percent of all social homes in Australia. Many CHO also manage affordable rental homes, targeted at low to moderate income (rather than very low income) households. Some CHOs also manage specialist disability accommodation, with over 40 CHOs registered with the NDIS Quality and Safeguards Commission.

CHOs are regulated under the National Regulatory System for Community Housing, the Registrar of Housing Agencies (Victoria), and the Community Housing Regulatory Framework (Western Australia) and manage tenancies in line with relevant State/ Territory tenancy legislation. They are also registered with Australian Charities and Not for Profits Commission (ACNC).

The financing and approval pathway to efficiently deliver non-market homes for low and moderate income people is complex and involves high transaction costs. While state and territory governments play a vital role in delivering new social homes, equally vital are the complex partnerships between CHOs, philanthropists, local government, and commercial entities.

Leveraging the community housing industry's capacity to layer public and private sector financing to develop additional provision presents an opportunity to significantly expand the supply of social and affordable homes available to the community in perpetuity.

1.2. Community Housing Disability Network

Around 30% of households accommodated by registered CHOs include people with disability. Registered CHOs embrace and have a regulatory obligation to both engage with their tenants (including people with disability) and to encourage their social and economic participation.

CHIA is building on its commitment to deliver more and better housing for people with disability by facilitating the establishment of the Community Housing Disability Network (CHDN). The CHDN is a network of CHOs and others including academics, groups representing people with disability, and people with lived experience. Network members are committed to sharing insights, experience, and expertise, to develop solutions / responses that will improve non-market housing and improve housing options for people with disability while also influencing mainstream housing practice and

design¹. Our focus is primarily on those households on lower incomes unable to access suitable market housing or ineligible for specialist disability accommodation.

CHDN members participate in various ways in according to their capacity and experience by:

- Taking a leadership role in steering the network
- Contributing expertise at the network face to face meetings and through additional feedback forums
- Assisting with consultation
- Contributing funds to commission research expertise
- Participating in post-project communication activities.

CHDN is currently being facilitated by KPMG on a pro bono basis.

CHDN has identified four initial areas of work, now underway. Since CHDN receives no funding, progress depends on member inputs.

- **Capability - Sector Capability Resources Project** - To develop greater CHO capability to offer services to people with disability and support them to navigate through the system
- **Communication - Core Business Paper** - To develop a document to educate government and other colleagues on the role CHOs can play in meeting the housing needs of people with disability
- **Analysis - Data Resources Project** - To collect information on people with disability, housing stock and levels of accessibility, issues they have been dealing with, management strategies and areas for learning
- **Engagement - Consultation Forums** - To engage with people with disability to inform them about community housing and the CHDN, and to seek their feedback.

1.3. About this submission

This document supplements the joint CHIA and National Shelter submission to the National Housing and Homelessness Plan (NHHP). That submission drew on members' views as well as on existing published research, including that commissioned by the proponents as well as by AHURI.²

CHDN supports that submission and its contention that the NHHP must encompass the whole housing system if the complex, interlinked and longstanding problems are to be solved. CHDN also supports its position that leadership is critical, and that the Plan must be developed and led by an agency with whole of housing system expertise and leverage key institutions such as the National Housing Supply and Affordability Council, Housing and Homelessness Ministers meetings and National Cabinet.

Whereas the main CHIA/National Shelter submission focuses on the high level aims and objectives of the NHHP this document focuses specifically on issues specific to people with disability; in particular those on low incomes. It draws CHDN activity to date, including the recent submission to the NDIS review, Good Foundations³. It also includes the results from a CHDN member survey on

NHHP priority objectives and reforms.

1.4. Our position on the National Housing and Homelessness Plan

The Issues Paper produced by the Department of Social Services (DSS) to inform the NHHP fails to adequately consider the housing needs of people with disability. It acknowledges *‘there is strong evidence many disadvantaged and vulnerable people experience individual and complex challenges accessing housing’* and includes, people with disability amongst the long list. It rightly notes that *‘the specific housing needs of some of these groups have been the focus of national strategies such as Australia’s Disability Strategy 2021–2031’*⁴. This strategy includes an *‘Inclusive Homes and Communities Outcome Area’* specific to housing for people with disability. It includes an objective to *‘increase the availability of affordable housing’* and a second that *‘Housing is accessible and people with disability have choice and control about where they live, who they live with, and who comes into their home’*. However, the ADS fails to identify actions to improve housing outcomes and nor does it link to any other plans that are taking forward initiatives.

While welcome steps are being taken to increase the provision of social and affordable rental housing by the Federal government and also by some States and territories, these programs generally include no specific focus on people with a disability, albeit with the exception of the Victorian Government’s Big Housing Build’s Mental Health Supported Housing Round.

We believe the National Housing and Homelessness Plan can and should play an important role in enabling increased access to housing for all people with disability, particularly those on low incomes.

2. Why the NHHP needs an explicit focus on housing for people with a disability

2.1. The Evidence about Housing Need

For people with disability, including NDIS participants, securing suitable housing is complex. This complexity is compounded as many people with disability require support. In many instances, this support is funded by the NDIS.

The housing that people with disability live in can be grouped into Specialist Disability Accommodation (SDA), Non-SDA Supported Accommodation, Social and Affordable Housing, Private Rental, At Home, and interim options. In many cases, people with disability may live in inappropriate housing, such as in Residential Aged Care (RAC), hospitals, homelessness services and prisons. Because people with disability are frequently unable to access the housing for which they are eligible, they are often displaced into other, less appropriate housing options.

While the funding of specialist disability accommodation (SDA) through the NDIS will assist individuals with the most significant functional and support needs, this is a small proportion of those in unsuitable and / or unaffordable housing. By the NDIA’s own estimates *‘as at 31 December 2020, there were 76,062 plans with a ‘Where I Live’ goal identified, 17.6% of total NDIS active participants’*⁵.

Publicly available information about the current shortfall and projected future housing needs and aspirations for people with disability is, however, extremely patchy. The National Disability Asset pilot provides limited information on need but clearly identifies that people with disability are far more likely to be in homeless – five times more likely to access specialist homelessness services than the general population, and eight times more likely to be living in public housing.⁶

Though somewhat dated, research conducted in 2015 *NDIS, housing assistance and choice and control for people with disability*⁷ quoted estimates based work commissioned by the NDIS, and presented by Bruce Bonyhady in several public speeches he made – i.e., that there was ‘*an estimated unmet need in affordable housing for between 83,000–122,000 NDIS participants at full rollout of the scheme in 2019*’.⁸

Responses to the Australian Disability Strategy consultation also indicate that people with disability are disproportionately represented among those experiencing rental stress.

- Fifty-nine per cent of survey respondents said access to affordable and accessible housing and accommodation was a major or severe issue." (National Disability Strategy Consultation Report 2019).
- 11.2 per cent of Australians with disability were living in unaffordable housing compared to 7.6 per cent of people without disability." (University of Melbourne, 2019).

2.2. National Housing and Homelessness Agreement- Findings

Government-funded housing assistance, including for people with disability, is framed mainly through the National Housing and Homelessness Agreement (NHHA), which governs the provision of around \$1.6 billion each year to states and territories to improve Australians' access to secure and affordable housing across the housing spectrum.

The Productivity Commission review of the NHHA⁹ concluded that the NHHA is failing to meet the governments' obligations under Australia's Disability Strategy to increase the availability and accessibility of affordable housing for people with disability, and for people with disability to have choice and control over their housing. The Review proposed commissioning a housing Targeted Action Plan under the ADS.

2.3. The Disability Royal Commission – Findings on Housing

The Disability Royal Commission report¹⁰ highlights the barriers faced by people with disability to secure appropriate housing. Group homes are recognised as potentially denying ‘*people with disability their autonomy, choice and control*’ and exposing them to ‘*various forms of violence, abuse, neglect and exploitation*’ and the Commission ‘*strongly support the adoption of more inclusive and alternative models of housing for people with disability*’.

The Commission also notes that ‘*People with disability are conspicuously absent from national housing and homelessness policy frameworks*’ and recommend that people, with disability are involved in the new institutions such as the National Housing Supply and Affordability Council but also including ‘*people with disability as a priority group in developing reforms*’ such as the National

Housing and Homelessness Plan. They also recommend the ‘government include homelessness as a policy priority in the Inclusive Homes and Communities outcome area of Australia’s Disability Strategy (ADS)’.

On accessibility standards for new social housing, the Commission recommends that these are built to the Australian Building Codes Board (ABCB) Voluntary Standard for Liveable Housing Design: beyond Minimum (Voluntary Standard)¹¹. The Commission recommended that jurisdictions (NSW and WA) yet to adopt the mandatory Livable Housing design standard 2022 residential housing and apartments do so immediately.

On social and affordable housing, the Commission recommends a commitment *‘to increasing the supply of accessible and adaptive housing for people with disability.’*

However, the recommendation to eliminate group homes over 15 years with *‘alternative housing options’* was not supported by all Commissioners. The report calls on the NDIA to expand *‘the Home and Living Demonstration Projects with additional rounds from 2024. These rounds should explore diverse market mechanisms for sustainable housing. They should also include independent evaluation and dissemination of best practice to bring these models to scale.’* They also suggest that NDIS funding be made more flexible to facilitate access to other housing options.

The Commission made some observations on home modifications noting two key issues *‘identifying who is responsible for providing modifications and the evidence required to support modification requests’*. It also heard *‘accounts of rents being raised as a result of modifications, which, in turn, made accessible homes unaffordable’* and, noted that the NDIS only funded modifications where a tenant had long term tenure. While the Commission recommended developing and implementing *‘accessible and inclusive processes for allocating and modifying social housing for people with disability’* it did not sufficiently address the wider issue of access to home modifications.

Other recommendations include, improving homelessness support services and developing *‘an individualised assessment of a person’s housing needs and preferences’* and planning exits from institutional settings including correctional facilities.

3. The National Housing and Homeless Plan – Purpose and Architecture

As the NHHP Issues Paper acknowledges, recent years have seen many reviews, reports and inquiries into housing but *‘very few national strategies dedicated to setting out a long-term agenda and committed actions’*.¹²

3.1. Role of the NHHP: the opportunity

For too long the Australian housing system has been viewed as a by-product of efforts to tax, finance, support and regulate other sectors of the economy.¹³ It is time to focus on making the housing system work efficiently to house the population of Australia. The NHHP provides a crucial opportunity to build the skills, institutions and governance structures needed to tackle the full breadth of Australia’s housing policy challenge.¹⁴

It must be hoped that the Plan will form the first step towards a more productive and better functioning housing system where ultimately – and through a range of market and non-market strategies – everyone in Australia has a safe, affordable, accessible and appropriate place to live.

We believe that the Plan must encompass the whole of the housing system – market, social and affordable homes, as well as homelessness services. This means placing the focus on tackling need - ensuring there are enough of the right homes in the right places to meet the needs of the whole population, including people with disability whose housing options are restricted by comparison with those of most Australians.

Planning for the whole housing system means defining the expenditure and reform priorities needed to articulate with other national policy objectives such as in relation to immigration and population growth, infrastructure development, responding to climate change, and Closing the Gap. Planning for the whole housing system means addressing overarching issues like accessibility and climate change resilience which are relevant to all sectors of the market but are often given insufficient attention in the specific context of rental housing.

3.2. Vision

CHDN believes the overarching vision needs to be meaningful to everyone. We suggest the following words or words with a similar meaning:

‘Everyone in Australia has a safe, affordable, accessible and appropriate home’

3.3. Goals

For the Plan to be effective the NHHP also needs to set out clear goals that are connected to achievement of the long term vision.

We surveyed the CHDN members on the goals that they believe are important steps toward achieving a situation where ‘everyone in Australia has a safe, affordable, accessible and appropriate home’. These are consistent with those articulated in the CHIA/National Shelter submission, though with additional emphasis on accessibility of housing. The goals are as follows:

- Ending homelessness
- All new housing built to NCC standards
- Fair access to home ownership and a fit for purpose private rental market
- All housing meets minimum condition, accessibility and amenity standards
- An efficient and responsive land and housing development sector that contributes to economic performance
- All communities have enough social and affordable housing to meet need
- Adequate provision of First Nations housing to meet need including for people with a disability.

3.4. Action Plans

The NHHP Action Plan needs to include clearly stated goals, actions and timelines to achieve the goals, indicators and targets to measure progress towards the goals and budget commitments against the Plan's actions.

There needs to be clearly stated agency and jurisdictional responsibility for achieving the specified goals, actions and targets. These need to be monitored and reported in a way that is clear and publicly accessible. The content of the NHHP and associated documents must be fully accessible and include Easy Read options.

3.5. A Targeted Housing Action Plan for People with Disability

We believe it is essential that the NHHP contains distinct but also fully integrated plans to tackle homelessness, and address the housing needs of people who experience very high barriers to accessing the private rental market such as First Nations households and people with disability.

The NHHP will set out the broad goals and actions to improve housing outcomes. However, to accommodate the detailed reforms required to meet the specific housing needs of people with disability, there needs to be a separate but linked targeted action plan. To ensure that the actions are also linked to other services and initiatives that are reliant on or impacted by access to access to housing, this action plan should be developed under the Australian Disability Strategy.

This targeted action plan should be produced with input from people with disability and must set out in detail how the Plan's broader objectives will be delivered to ensure they meet the needs of people with disability.

3.6. Indicators and targets

Publicly accessible versions of the NHHP must specify specific, measurable, accepted, realistic and timebound targets that make it possible for people with disability to understand the progress toward achieving the Plan's goals.

CHDN members believe it is important that national targets specified in the NHHP are broken down into State / territory targets. In addition, the proposed targeted action plan for people with disability should contain indicators and targets that measure change in housing outcomes for people with a disability over time.

We recognise the process of developing the targets will necessarily involve identifying and agreeing a package of data indicators with a range of stakeholders including the National Housing Supply and Affordability Council, the ABS, NDIA and AIHW. The indicators also need to be meaningful to people with lived experience.

In their survey responses CHDN members commented on the types of indicators and targets seen as potentially meaningful measures of progress towards the vision of 'everyone in Australia has a safe, affordable, accessible and appropriate place to live'. Suggestions are listed below, noting that these supplement higher level indicators in CHIA's main submission including ending homelessness, home

ownership rates and reducing rental stress that should be reported for different population groups. The proposed indicators – not an exhaustive list – are:

- All states and territories implement current ABCB minimum accessibility standards
- Reduce the number of NDIS participants with unmet housing needs
- The number of new homes built to defined accessibility standards (incl. ABCB minimum and voluntary accessibility standards and Livable Housing platinum standard)
- End the institutionalisation/accommodation of young people in residential care (by and providing them with alternative suitable, community-based housing and support options)
- Renovate or renew all basic level SDA (by 2030)
- Increase in homeownership rates for people with disability
- Increase housing options for people with disability, in remote areas.

We also suggest that indicators to measure satisfaction with home and services are included potentially based on the measures used in the AIHW's National Social Housing Survey.¹⁵

In CHIA/National Shelter main submission we stressed that fit for purpose institutions would be needed to ensure the NHP delivers change. There is also a need for arrangements to co-ordinate across governments, agencies and industry to deliver Plan actions successfully.

3.7. The role of Housing Australia

We believe that a dedicated agency should be tasked with ensuring the Plan is delivered and that should be Housing Australia. CHIA's position paper on the role and scope of a National Housing Agency sets out in more detail our thinking.¹⁶

Specifically, the agency should:

- Consult and co-ordinate with industry and other state government and federal agencies such as the Health, the NDIA, and Social Services, ensure that plans are integrated and complementary. To ensure the needs of people with disability are reliably recognized Housing Australia will need to establish formal connections with those responsible for the Australian Disability Strategy and senior leadership in the NDIA
- Engage with the wide range of stakeholders including sector peak bodies, housing consumers, regional and remote communities, First Nations communities, allied health professionals and disability advocacy groups
- Ensure that it supports high minimum (including accessibility) standards for new homes commissioned via its funding programs.

For the CHDN it is important that the Housing Australia board includes members with expertise and knowledge in the housing needs of people with disability and a commitment to high design standards for new homes.

There is also scope for Housing Australia to use its research function to support the centre outlined in section 4.3.

3.8. National Housing Supply and Affordability Council

We welcome the establishment of the National Housing Supply and Affordability Council. The Council is well placed to assume responsibility for monitoring delivery of the Plan, overseeing the development of Plan indicators and targets, and ensuring the data needed to analyse the performance of the Plan is broadly available to the housing industry, consumers and academics. We also welcome that the permanent Council will include at least one member with experience and expertise of housing with disability. This must involve individuals knowledgeable on design standards, specifically accessible inclusive housing. It is however important that the Council is informed by the views of consumers and representative bodies – see 3.11.

3.9. Housing and Homelessness Ministers meetings

The States and Territories are significant stakeholders in the delivery of the Plan. Their support is critical to achievement of any proposed goals and targets. We therefore propose that progress on Plan delivery is monitored by regular Housing and Homelessness Ministers meetings. These meetings should include regular input from building and disability Ministers to ensure co-ordination of the NHHP's deliverables through National Cabinet.

3.10. A consumer council and expert group

Housing consumers are perhaps the NHHP's single most important stakeholder group. We believe it is essential that Plan implementation is supported by a housing consumer council or similar arrangement. The role of the consumer council would be to provide the National Housing Supply and Affordability Council with a consumer perspective. The Consumer Council should include representation from people with disability.

In addition, as noted earlier we recommend that the proposed targeted disability housing action plan is overseen by an expert forum. We recognise there are existing consultative forums for SDA but the proposed forum has a far broader remit. This group can be drawn from industry, other parts of government including Housing Australia and participants. The process could be driven by the Disability Reform Council given the need for Commonwealth and State / Territory co-ordination and the Council's role in disability policy and implementation

3.11. Publicly available data

Data on unmet housing needs (including those for involving people with a disability) is needed at the national, state / territory and regional levels to inform the Plan and the proposed NDS targeted housing action plan. In addition, it would assist organisations responding to social and affordable housing programs (such as the Housing Australia Future Fund) to tailor their proposals to better meet the needs of people with disability.

The NDIA has an important role to play informing housing policy responses to housing needs for NDIS participants. Through the development of the [National Disability Data Asset](#) the agency is well placed to analyse, make accessible, and publish annual data on housing needs; perhaps in collaboration with the AIHW, ABS and Housing Australia. As a first step the information held in the 75,000 plus plans should be reviewed to identify data available for categorisation and which would assist in strategic planning such as in relation to:

- location, size and type of accommodation needed
- employment status
- household characteristics.

Key to measuring the Plan's success in the future is baseline national data comparing current housing provision with current and anticipated future needs.

Examples of nationally consistent datasets include:

- Social and affordable rental housing provision by location and ownership type
- Social rental homes by location, accessibility standard and sector
- Breakdown of current social and affordable rental housing stock according to quality, accessibility and amenity
- Data on the cost of delivering social and affordable rental homes in different jurisdictions and for different accessibility standards.

We also need to develop data to enable an understanding of the provision of home modifications.

4. NHHP Actions and Initiatives

Through our CHDN member survey, we identified a number of reforms and initiatives that should be included in either the NHHP (specifically the National Social and Affordable Housing Program) or in a targeted housing action plan. Note that the CHDN submission does not duplicate the full range of initiatives proposed in the CHIA/National Shelter submission. It focuses specifically on initiatives relevant to members of the CHDN group - primarily access to and provision of high quality social and affordable rental housing.

4.1. A National Social and Affordable Housing Program

Australia needs a substantial increase in social and affordable housing provision. People with disability are likely to be disproportionately represented among those in unmet housing need identified in analysis of the 2021 Census commissioned by CHIA.¹⁷

The NHHP presents an important opportunity to embed a long term program for the supply of social and affordable rental homes.

In addition, the Plan should set directions and priorities for the delivery of new social and affordable homes – including the need to respond to the needs of people with a disability and older people. This should include setting targets for minimum accessibility standards in all government-supported housing.

More appropriate home and living arrangements will result in reduced health and support costs for NDIS participants and increase their opportunities for social and economic participation – access to affordable housing will result in reduced costs in other support systems. Infrastructure Australia in its 2021 Australian Infrastructure Plan has recommended that ‘there need to be more fully developed business cases that capture and assess the wider societal and economic benefits of social and affordable rental housing programs’.

4.2. Implementing a plan to replace all basic / legacy specialist disability accommodation

The NHHP and a targeted housing action plan in the Australian Disability Strategy provides an opportunity for a more strategic approach to the renewal and replacement of non-contemporary specialist disability accommodation (SDA), including aging group homes, congregate living accommodation and other unsuitable disability housing. This would provide opportunities for new disability housing provision reflecting contemporary models of living and support and participant preferences.

There are examples to follow including the Hunter Residence Program in NSW which saw the state government contracting with the community housing industry to provide new accommodation for people living in obsolete and inappropriate institutional settings.

4.3. Establishing a national industry collaboration centre on contemporary housing for people with disability to measure and evaluate outcomes, share technology and design innovations and promote best practice

As noted earlier the Royal Commission identified the need for ‘independent evaluation and dissemination of best practice’ housing models. CHDN members are also keen to see a focus on innovative housing design and showcase innovative approaches already developed through the SDA funding model but also more generally in terms of housing for people with a disability.

The centre should be focused on promoting practical ideas for improving amenity and housing standards, including mechanisms that support the integration of disability housing into mixed developments to create inclusive neighbourhoods.

It could also have a role in investigating the potential of emerging technologies and construction methods to enable a strategic approach to improving housing design.

4.4. Promoting excellent tenancy management services

Providing housing and housing services to people with disability can be complex. This complexity increases with the policy separating housing and support endorsed by the NDIA. Because registered community housing organisations have championed and pioneered the separation of housing and support over decades they have well-developed systems for consultation, collaboration and co-operation. Unfortunately, many newer providers have little expertise in housing people with disability and poor collaboration with support providers increases the risk of failure to integrate housing and support.

SDA providers are to be required to register with the NDIA. However, where this accommodation is rented there are currently no expectations of the tenancy management services unless the provider is also a registered CHO and required to meet additional performance standards. There should be consideration of extending the coverage of the national regulatory system for community housing (or Victorian and WA equivalents to encompass all SDA provided by investors / CHOs).

However, even in the case of the community housing sector we believe there is further scope for demonstrating service excellence for people with disability. The CHDN's project on sector capability aims to assist CHOs in this respect.

The community housing industry has already been funded by the Department of Veteran Affairs to develop an industry standard to demonstrate best practice in responding to veterans. The CHDN proposes that a targeted housing action plan includes support to the sector to develop a similar industry standard for tenancy management services and accommodation for people with a disability that would:

- define minimum expectations through to what constitutes excellence
- consider tenancy management responses that are standard for any household through to enhancements required for people with complex needs
- consider likely directions and support for tenancy management, assessment management and property standards
- specify expectations on home modifications
- recognise the need to empower applicants and tenants.

4.5. Enable registered community housing organisations to play a market stewardship role by facilitating access for NDIS participants to a broad range of housing providers

Given the relative absence of information about housing suitable for people with disability together with its actual scarcity, there is merit in focusing on how to improve mechanisms to assist NDIS participants to navigate housing systems. This includes increasing the capacity and capability of local area co-ordinators (LACs), Community Connectors, and Support Coordinators to assist NDIS participants identify housing options and plan their housing.

Individuals will need information and connections to enable them to assist their participants beyond SDA and other NDIS funded housing options. The NDIA should be facilitating these

connections and exchange of expertise with local housing and homelessness organisations, funding services where this is needed to train, assist with housing assessments etc. There is a significant opportunity to build the capacity of individual registered CHOs to play a market stewardship role by facilitating access to a broad range of housing providers.

4.6. Establishing a national data register of accessible social and affordable rental housing

NDIS participants can access information about SDA and other disability housing options through search websites The Housing Hub and Nest, and more recently the NDIA's SDA Finder.

But an ongoing challenge for people needing accessible housing is the invisibility of housing with accessibility features in the private market. Within the social housing sector, neither state housing authorities nor CHOs make available information about the location of accessible properties.

Accessible housing registers help widen the information available about potential housing options for people with disability in mainstream markets. One international example is the London Accessible Housing Register which has been in place for 15 years and was the subject of a favourable evaluation in 2011¹⁸. Initially piloted by two London Borough Councils it involved the development of improved property survey methodologies to identify accessible and adaptable homes which then enabled better targeting of allocations. The evaluation found that one of the Councils – Kensington and Chelsea *'more than doubled the number of lettings involving disabled people appropriately rehoused from 5% to 12% of total council lets'*.

Development of accessible housing registers should be further explored in Australia to increase information about housing options for people with disability.

4.7. A focus on modification and renovation of existing properties to ensure they are fit for purpose for people with disability and older people who wish to age in place.

Home modifications is a sorely overlooked policy area. The separation of programs under different jurisdictions compensation schemes, the NDIS, and My Aged Care mean there is no equity of access to these, and for most people there is a significant cost to them to have modifications done in their homes. For people in rental accommodation these issues are compounded. Even in public and community housing access to funding for modifications is variable.

Sadly, the Disability Royal Commission was unable to investigate the home modification system and thus its recommendation is too high level to be acted upon.

There are examples from overseas where home modifications (or adaptations) are considered as part of the housing continuum, funded through the overall housing budget appropriations, and delivered as needed via grants to individuals who require them.

For example, England's Disabled Facilities Grant (DFG)¹⁹ has enjoyed funding close to \$3 billion annually to remediate the inaccessibility of existing homes for those whose mobility impairment requires these changes to be made. Customised modifications that are specific to people's functional

needs also remain available through separate social care funding mechanisms; but the structural changes to a house arising from inherent design flaws (i.e., they are inaccessible) are covered by the DFG.

The success of the DFG in England in reducing presentations to Accident and Emergency departments, and delaying entry to residential aged care, has delivered economic benefits to the Health budget and resulted in the continued increases in its funding over the past decade.

The NHHP needs to include modifications as part of its strategy to render the current housing stock suitable for the stated purposes of the various social care programs that Australia has committed to.

The targeted action plan thus needs to review the home modification programs and develop a consistent national framework that is adopted across jurisdictions and agencies, sets expectations and measures progress.

4.8. Other Suggestions

Other initiatives suggested by CHDN members for inclusion in the Plan included:

1. Establishing a forum immediately to determine how the mandatory accessibility standard should be improved in the next update of the NCC and beyond. This is necessary to enable a strategic approach to improving building standards
2. Develop a systematic plan to provide young people currently in institutionalised accommodation settings in residential homes to be provided with alternative suitable, community-based housing and support options
3. Establish financial products that enable people living with disability on a low income to take up home ownership
4. Investigate an approach to using planning mechanisms to support higher standards of accessibility in new housing
5. Measures to help NDIS participants in severe housing stress, possibly through providing a top up payment to bridge the gap between the market rent and what an individual can afford to pay from their disability support payment.

5. Endnotes

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