



People with Disability Australia Incorporated

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**NSW Government
Foundations for change – Homelessness in NSW
Discussion Paper September 2016**

People with Disability Australia (PWDA)

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About People with Disability Australia (PWDA)

1. People with Disability Australia (PWDA) is a leading disability rights, advocacy and representative organisation of and for all people with disability. We are a NSW and national, cross-disability peak representative organisation. We represent the interests of people with all kinds of disability. We are a non-profit, non-government organisation.

Introduction

2. PWDA welcomes the opportunity to respond to the NSW Government's Foundations for change – Homelessness in NSW discussion paper. Homelessness is an important issue that disproportionately affects people with disability. In addition, people with disability are often affected by, and experience homelessness in different ways to the broader community.
3. It is imperative that people with disability have access to the full range of policies, programs and services that both assist in the prevention of homelessness, and support people experiencing and exiting homelessness. We support the efforts of Minister Hazzard and NSW Family and Community Services (FACS) to ensure that the breadth of homelessness services are coordinated and focused on prevention as well the direct homelessness support.
4. We know that a significant number of people who are homeless, whether they are rough sleeping, couch surfing or utilising specialist homelessness services have received a mental health diagnosis. There are also people who are falling through the gaps, having not received a diagnosis, but still experiencing psychosocial disability. These individuals may not be accessing specialist mental health support accessed by referrals through the homelessness sector.
5. Other factors, such as physical access to services, or the unpreparedness of services to meet the needs of people with disability mean that the identification of people with disability in the discussion paper as a priority group is welcome and must be accompanied by action on behalf of government to ensure better outcomes for people with disability across the housing and homelessness sectors.

Recommendations

- That the NSW Homelessness Strategy adopt a 'no exit into homelessness' policy, and that this applies to all current residential services, including disability services.
- That a comprehensive review of data is undertaken as an early action of the NSW Homelessness Strategy to provide a full picture of people experiencing, or at risk of homelessness. This data should be disaggregated to capture intersectionality, which may place certain people at greater risk of housing insecurity and homelessness.
- That the NSW Homelessness Strategy be aligned with social housing reform and the services reforms associated with the NDIS
- That the NSW Homelessness Strategy directly respond to the goals and objectives of the National Disability Strategy and the NSW Disability Inclusion Plan, and that the monitoring and evaluation structure of the new Strategy align with the complementary structures within the DSP and NDS.

- That the NSW Homelessness Strategy drives initiatives to ensure that all homelessness related services are disability responsive
- That support, such as specific training, capacity building and financial investment is provided to homelessness related services to improve disability responsiveness.

Policy Settings

6. The broader policy context needs to be considered and addressed in the strategy that is developed from this discussion paper. In the context of disability, the United Nations Convention on the Rights of Persons with Disabilities, the National Disability Strategy and the NSW Disability Inclusion Plan set out the key principles in this policy space.
7. The Convention on the Rights of Persons with Disabilities (CRPD) outlines the rights of people with disability in line with existing rights contained in other human rights instruments. Article 19 of the CRPD enunciates the right of persons with disability to live independently and be included in the community, with choices equal to others in the community. This is understood to mean that people with disability have the opportunity to choose their place of residence and where and with whom they shall live on an equal basis with others; are not obliged to live in a particular style of living environment; and have access to a range of in-home, residential and other community support services, including personal assistance necessary to support living and inclusion in the community, and to prevent isolation and segregation from the community. Ultimately, this article articulates that people with disability have an equal right to a safe and secure home.
8. The National Disability Strategy 2010-2020 (NDS) outlines a number of key areas for action. The NSW Government, through the COAG process, has signed up to take action in these areas as part of the delivery of the goals in the NDS. The key areas for action under the NDS, which are all relevant to a whole of government homelessness strategy, are:
 - Inclusive and accessible communities
 - Rights protection, justice and legislation
 - Economic security
 - Personal and community support
 - Learning and skills
 - Health and wellbeing
9. The NSW Disability Inclusion Plan (NSW DIP) identifies four areas for action, all of which are applicable to the development of this strategy. They are:
 - developing positive community attitudes and behaviours
 - creating liveable communities
 - supporting access to meaningful employment
 - improving access to mainstream services through better systems and processes
10. The NSW Government needs to ensure that the commitments, goals and deliverables set out under the NDS and the NSW DIP are aligned and complementary to the NSW homelessness strategy and deliver sustainable outcomes for people with disability.

Disability Responsiveness

11. This state-wide, whole of government response to homelessness must be *disability responsive* in all its areas of operation. This means that all aspects of Government and the non-government sector need to be prepared to meet the needs of people with disability, in

the same way that they are able to meet the needs of others in the community. We know that this is not currently the case.

12. To achieve improved responsiveness to people with disability there is a need for training, capacity building and investment across the range of mainstream housing and homelessness support services who may be working with people with disability. This needs to include both general disability awareness training, as well as training that addresses the specific issues that services in different sectors are likely to encounter. Audits of homelessness services in relation to how responsive they are to people with disability would help to direct future capacity building and training efforts in this area.
13. Disabled Peoples Organisation's (DPO) are best placed to provide this type of training, due to the unique experience they have employing people with disability, and representing the interests of people with disability. DPOs are also uniquely engaged with the NSW public and NGO sectors through work in individual or group advocacy, which provides a unique context for this type of training. DPO's also have grassroots expertise from a cross-disability perspective, grounding in disability inclusive training and policy development, understanding of current NSW disability policy, background in working with public service agencies from a disability perspective, experience of co-produced training and education products.

Housing options

14. We note that there is not enough emphasis on Social Housing in the discussion paper. *Future Directions for Social Housing in NSW* outlines more detail about social housing policy, but the synergy of these policies needs to be referenced in the homelessness strategy.
15. While innovation in the social housing sector is welcome, it can't be at the expense of maintaining existing efforts that successfully reduce homelessness in the state. As such we believe that the strategy should also recognise that the need for attention and resourcing to be given to growing the supply of accessible social housing.
16. The discussion and utilisation of private rental as a tool to address homelessness, needs to acknowledge that there are barriers to accessing private rental, for many groups, including many people with disability. These barriers include issues of supply, cost, and discrimination, and all of these issues need to be addressed in the development of a comprehensive, whole of government strategy. The lack of affordable private rental is a major barrier to many people experiencing homelessness. The appropriateness of the available housing stock also contributes to the vulnerability of people with disability to homelessness. Issues such as the lack of universally designed housing, discrimination in the private rental market, through to the size and location of appropriate housing stock need to be addressed.

Other issues

17. There is a need for the adoption of a 'no exiting into homelessness' policy as part of the development of this strategy. A number of significant shifts in policy over recent years (such as reforms in the boarding house sector, the closure of large residential institutions) are resulting in increasing numbers of people with disability looking for alternative, appropriate accommodation. It is imperative that strategies are put in place to ensure that a 'no exiting into homelessness' policy also covers those disability specific and other services where

people with disability are exiting. This will require an oversight mechanism, as well as comprehensive education undertaken with the disability services sector to ensure that their role in achieving this commitment is clearly understood.

18. Conversely, the role of NDIS in meeting the housing needs of people with disability needs to be better understood. The NDIS will not provide housing and accommodation to people who are eligible for the scheme, it will not pay rent or build a house. While the NDIS will contribute to Specialist Disability Accommodation, this is a very limited supply side program that is estimated to help about 4% of eligible people across the country.
19. It is vital that homelessness and mainstream services understand the scope of the NDIS. Many people with disability will not be eligible for direct support under the NDIS. We have received reports of people being turned away from other mainstream services, or charged commercial rates for services, on the basis of assumptions about the role of the NDIS in the provision of services to people with disability.
20. The discussion paper talks about the use of data. While there are many ways in which data could be better used to improve outcomes for people, work needs to be undertaken to ensure that it is accurate. Common definitions and their consistent application is important if this data is to be useful in meeting the goals of the strategy, and this is especially important in regards to disability, but also other areas including gender identification.
21. The discussion paper outlines a number of key population groups that will be addressed in the Strategy. It must be recognised that many people fit into more than one group and this intersectionality should be acknowledged. The invisibility of lesbian, gay, bisexual, transgender, intersex and queer (LGBTIQ) people in this discussion paper needs to be addressed in the strategy. LGBTIQ people are largely invisible in the other population groups, despite often being at high risk of homelessness due to experiences of DFV and discrimination.

About People with Disability Australia

People with Disability Australia ([PWDA](#)) is a leading disability rights, advocacy and representative organisation of and for all people with disability. We are the only national, cross-disability organisation - we represent the interests of people with all kinds of disability. We are a non-profit, non-government organisation.

PWDA's primary membership is made up of people with disability and organisations primarily constituted by people with disability. PWDA also has a large associate membership of other individuals and organisations committed to the disability rights movement.

We have a vision of a socially just, accessible, and inclusive community, in which the human rights, citizenship, contribution, potential and diversity of all people with disability are recognised, respected and celebrated. PWDA was founded in 1981, the International Year of Disabled Persons, to provide people with disability with a voice of our own.

PWDA is also a founding member of Disabled People's Organisations Australia ([DPO Australia](#)) along with Women With Disabilities Australia, First Peoples Disability Network Australia, and National Ethnic Disability Alliance. DPO's are organisations that are led by, and constituted of, people with disability.

The key purpose of DPO Australia is to promote, protect and advance the human rights and freedoms of people with disability In Australia by working collaboratively on areas of shared

interests, purposes, strategic priorities and opportunities. DPO Australia has been funded by the Australian Government to be the recognised coordinating point between Government/s and other stakeholders, for consultation and engagement with people with disability in Australia.