National Aboriginal and Torres Strait Islander Housing Authority

Ably supported by National Congress of Australia's First Peoples

Submission on the Closing the Gap Refresh

Targeting Housing and Homelessness

August 2018

About the National Congress of Australia's First Peoples and the subsequent establishment of the National Aboriginal and Torres Strait Islander Housing Authority

The National Congress of Australia's First Peoples is the peak representative body for Aboriginal and Torres Strait Islander peoples. Established in 2010, National Congress has grown steadily and now comprises over 180 organisations and over 9,000 individual members, who elect a board of directors.

National Congress advocates self-determination and the implementation of the United Nations Declaration on the Rights of Indigenous Peoples. National Congress believes that Aboriginal and Torres Strait Islander people must be central in decisions about our lives and communities, and in all areas including our lands, health, education, law, governance and economic empowerment. It promotes respect for our cultures and recognition as the core of the national heritage.

In pursuit of self-determination and rights for Aboriginal and Torres Strait Islander peoples, National Congress' main foci to date have been quality health, and equal education, land and water rights, justice and sovereignty. In addition, National Congress has been involved advocating on a range of other issues, including cultural maintenance and development; improving government relations, including treaty discussions; employment and economic empowerment; housing; family violence; children and youth; disabilities; and governance and leadership.

Since being established, National Congress has actively sought to ensure that the voices of Aboriginal and Torres Strait Islander peoples are heard both domestically and internationally. Congress has been represented at the meetings of several international bodies, including the UN Permanent Forum on the Rights of Indigenous Peoples, the UN Human Rights Council and the Commonwealth Peoples Forum. Congress has also been involved in Closing the Gap Roundtable Consultations, the Closing the Gap Campaign and in providing advice and critique to governments regarding key policy decisions relating to Aboriginal and Torres Strait Islander affairs.

Domestically, National Congress led the creation of the Redfern Statement, which called upon the Australian Government to work alongside Aboriginal and Torres Strait Islander peoples in to develop lasting policy solutions. A specific strategic commitment identified within that Statement is the need to establish an independent organisation that could be representative of community and regionally based Aboriginal and Torres Strait Islander Housing Organisations. Section 4 of the Redfern Statement states (in part) that:

"Federal and State Government policies concerning Aboriginal and Torres Strait Islander housing is currently disjointed, wasteful and failing. For example, Aboriginal and Torres Strait Islander people in urban and regional markets face many barriers in accessing and securing safe and affordable housing, including discrimination and

poverty. The next Federal Parliament should support the development of a national representative body of Aboriginal and Torres Strait Islander leaders who can focus on housing security for Aboriginal and Torres Strait Islander peoples, and:
- *advocate for the ongoing support for remote communities to prevent community closures;*
- *work with communities to develop a national Aboriginal and Torres Strait Islander housing strategy, with the aim of improving the housing outcomes for our people across all forms of housing tenure; and*
- *provide culturally appropriate rental, mortgage and financial literacy advice".*

In July 2017 Congress conducted a National Housing Workshop to discuss the establishment of a National Indigenous peak body as a mechanism to ensure that Aboriginal and Torres Strait Islander people have a voice in housing advocacy, guidance and expert advice to all State and Federal Government politicians on policies, agreements, programs, standards and funding.

A keynote speaker at that workshop was Minister Nigel Scullion, Minister for Indigenous Affairs who stated that *"employment, proper housing, education, safety and wellbeing are all connected, and he would like the National Indigenous Housing Peak to set their policies and work with him in partnership to address these important social issues".*

The Report from this meeting provided several objectives for a National Aboriginal and Torres Strait Islander Housing Peak to progress:

- focus on housing security for Aboriginal and Torres Strait Islander peoples,
- advocate for the ongoing support for remote communities to prevent community closures;
- work with communities to develop a national Aboriginal and Torres Strait Islander housing strategy, with the aim of improving the housing outcomes for our people across all forms of housing tenure;
- covers all aspects of Aboriginal and Torres Strait housing – social, public, homelessness, affordable housing, housing management, home ownership and support services;
- identification of stock across each jurisdiction, management of caveats/registrations of interest;
- Review/development of the National Aboriginal Housing Standards;
- Provide culturally appropriate rental, mortgage and financial literacy advice.

A second meeting and workshop was held in Sydney in October 2017 and was attended by representatives from each State and Territory. The outcome of this meeting included the reinforcement and support for the establishment of the Aboriginal Housing Peak Body- NATSIHA therefore creating voice for Aboriginal and Torres Strait Islander people – for the needs of housing in line with the intended objectives.
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Introduction

The National Aboriginal and Torres Strait Islander Housing Authority (NATSIHA) welcomes this opportunity to contribute to the Closing the Gap Refresh Strategy and in doing so exercises its objectives and purpose, in accordance with NATSIAHA's establishment. This submission to the Closing the Gap Refresh has intentionally been developed to highlight the issues relating of housing and homelessness and positions these issues and recommendations for inclusion as new targets in a revised Closing the Gap Strategy. In this endeavour, NATSIHA submits evidence - based analysis, observations and recommendations for reform to urgently address the crisis in housing and homelessness affecting a disproportionate number of Aboriginal and Torres Strait Islander people across Australia.

The submission has been prepared through extensive consultation, drawing on the rich knowledge and expertise from NATSIHA members, all of whom are experts and leaders in their fields of Aboriginal housing across every State and Territory in Australia. We have also utilised evidence and policy expertise from the various community services peaks, housing policy peak bodies across the states, including National Shelter, Shelter NSW, NT Shelter, the Community Housing Industry Association (CHIA) and the Aboriginal Community Housing Industry Association NSW (ACHIANSW), VOOSS, QCOSS and WACOSS. It is worth noting that our policy positions are aligned.

NATSIHA's submission is strongly supported by National Congress, and it strongly speaks to, builds on and complements the analysis and recommendations made by the National Congress in its recent submission to the Closing the Gap Refresh Strategy. It is recommended that these two documents are read together. NATSIHA's focus on housing strengthens the Congress submission in terms of highlighting the fundamental targets required for housing, as well as highlighting the interdependencies with other targets such as health, education and employment.

We have seen the failures of the Closing the Gap Strategy to date and a key factor in this has been the lack of coordination or integrated government responses which seek to address health and housing issues together. Despite the evidence which strongly demonstrates the impact of poverty on health, the impact of poor housing on health and the impacts of poverty on sustaining tenancies and achieving social, health and wellbeing, there is still a gap in the coordination and delivery of housing and health services. The evidence is clear that whole of government responses are critical to make a real and enduring difference. Our submission highlights a number of health benefits of safe, secure and well maintained housing but also highlights the dire health consequences of poor housing or overcrowding. For example, prevention of acute diseases, such as rheumatic heart disease and scabies can be achieved if overcrowding is addressed. It is a national shame and shocking concern that in 2018 we are still responding to the management and treatment of such diseases, which are caused by poverty and overcrowding and lack of safe, secure and affordable housing.

NATSIHA's submission strongly argues the need for Governments' investments and long-term policy commitments to end homelessness for Aboriginal and Torres Strait Islander people and the critical importance of significant and long-term financial investment to facilitate access to secure, safe, affordable and culturally appropriate housing. The damage that has been done through years of policy neglect needs to be acknowledged, and in this, the investment to restoring the assets, delivering new homes and to healing the pain and suffering endured by many who are experiencing homelessness, overcrowding and substandard living conditions needs to provide policy certainty and confidence by peaks such as NATSIHA that outcomes will be achieved, and the gaps will be closed.

Our submission outlines several housing frameworks and models which position housing and homelessness in the broader public policy realm, therefore demonstrating the need to adopt an integrated, whole of Government and community-controlled partnership approach to drive outcomes.

We have seen the failures of the Closing the Gap Strategy to date. It's vital that Government learns from the past, harnesses the evidence, and is open to doing business in a different way if they are serious about making a difference and addressing entrenched disadvantage of the first nations people of Australia. We urge Government to take strong and concerted leadership and to put the Closing the Gap Strategy at the top of the Agenda and remain focused and invested on its goals. This will require a strong focus on implementation, review, monitoring and evaluation as well as driving systemic reform and adaptive approaches to achieve the targets. Most importantly this requires walking together with Aboriginal and Torres Strait Islander peaks, experts, communities and individuals who can provide expertise in the design and implementation and that is tailored for urban, rural and remote communities and culturally appropriate.

NATSHIA has established a set of principles which are outlined in this submission – which we believe, should be adopted by Government as this will go a long way to achieving the targets that need to be reset in the refresh. Key to these principles is Aboriginal self-determination and co-design. Governments must recognise that the situation of entrenched disadvantage and inequality have been created through generations of dispossession, marginalization and discrimination and the policies and decisions which affect Aboriginal and Torres Strait Islander people have been made without their involvement and "done to" not "designed with". The Australian Governments state, territory and commonwealth have a legal responsibility for housing all Australians.

Secure and affordable housing is fundamental to the wellbeing of every individual and an essential component of an inclusive and sustainable society. Research (for example, Baldry, McDonnell, Maplestone and Peeters (2003); Robinson (2003); Bridge, Flatau, Whelan, Wood and Yates (2003)[i]; Bessant, Coupland, Dalton, Maher, Rowe and Watts (2003)[ii]; Bradbury and Chalmers (2003)[iii] has demonstrated that housing provides a platform for a range of benefits, including employment opportunities, better health and wellbeing, access to education, connection to the

community and a sense of home. Aboriginal housing circumstances differ from those of non-Aboriginal people and are characterised by high numbers of households in insecure housing; a high proportion of renters; a high proportion of households in social housing; low levels of home ownership; high levels of homelessness; prevalence of overcrowding; and high mobility (temporary and forced) neighbourhood effects/living in low socio-economic areas; low-quality housing and housing disrepair; and remoteness. It's not just about bricks and mortar.

The evidence of the issues and challenges is clear, as outlined by Brackertz, Davison and Wilkinson (AHURI 2017)[iv] *"Aboriginal people face a number of barriers to accessing housing and services, including a high prevalence and often complex combinations of risk factors, disadvantage and racism in the housing market. The housing careers of Aboriginal people are shaped by entrenched poverty, accessibility of social housing, and the management practices of social housing providers. Under current policy settings many services are 'mainstreamed', meaning that they do not cater to the unique needs of Aboriginal people and therefore may not meet their needs. Aboriginal housing circumstances differ from their non-Aboriginal peers and are characterised by high numbers of households in insecure housing; a high proportion of renters; a high proportion of households in social housing; low levels of home ownership; poor housing affordability; high levels of homelessness; high prevalence of overcrowding"*

And as stated in VCOSS' submission to this refresh *"Closing the gap in health and wellbeing outcomes will require genuine reconciliation and a shifting of power and control away from government and mainstream organisations and back to community owned solutions. It requires a systemic approach to addressing the underlying causes of health inequality and a commitment to adequately funding preventive measures that address the social determinants of health and build the capacity of Aboriginal organisations and communities".[v]*

NATSIHA strongly asserts that the refreshed Closing the Gap Framework considers how the Housing for Health methodology can/must be applied across Aboriginal and Torres Strait Islander communities where overcrowding is an identified health issue.

In the spirit of partnership and advocacy NATSIHA is committed to partnering with State, Territory and Commonwealth Governments towards the advancement of Aboriginal and Torres Strait Islander housing policy and reform. We look forward to the day when there are appropriately resourced and focussed policies and housing programs in every State and Territory given the positive effect this can have on the social, economic, and general prosperity of Aboriginal people and communities.

Our submission calls for a national Aboriginal Housing Strategy and new national housing and homelessness targets as part of the Closing the Gap Strategy and should inform the potential Aboriginal specific targets which are currently being tested under the National Housing and Homelessness Agreements (NHHA).

We reiterate the central message of the Redfern Statement: we, Australia's First Peoples, have the solutions. We must be given the opportunity and resources to enable us to combat the disadvantages which we face. The principles of self-determination must be central to any refreshed Closing the Gap Strategy, not only in a symbolic sense, but a practical one also because it is crucial to ensuring that any services which are provided are culturally appropriate, tailored to the needs of individual communities, and relevant to our peoples' needs and lives. The Australian Government must ensure that Aboriginal and Torres Strait Islander peoples, communities and leaders are involved at every stage of the decision-making process.

Underpinning Principles

- Self-determination - as per the *United Nations Declaration on the Rights of Indigenous Peoples* articles 3 & 4

- Commonwealth recognizing of the role and responsibility of the national peaks and each jurisdictions peaks and communities and involving them in policy and decision making.

- Recognition that the Aboriginal and Torres Strait Islanders housing sector is a specialist, specific sector that has expertise and strengths which can effectively challenge, inform and influence Government the system to make improvements to the housing system and drives the way to do effective business in future.

- Willingness and commitment by Government to partner with States, Territories and the Commonwealth Government in the endeavour to achieve better housing outcomes for Aboriginal and Torres Strait Islander peoples.

- Striving for an integrated housing system in recognition that safe, secure and culturally appropriate housing is critical to social, economic and cultural infrastructure.

- Recognition of the differences across the States and the Territories, so requires flexible and tailored policy and program responses that are culturally appropriate.

- Valuing investment and innovation in early intervention and prevention which funds support services to prevent homelessness and sustains tenancies.

- Safe and secure and suitable housing that meets the housing, locational and cultural needs of individuals and families.

- Recognition of the importance of Aboriginal community-controlled delivery of the capital works and management of housing organisation.

- Investing and exploring innovative and proven housing models which are tailored to meet the needs of Aboriginal people in the environment they're living in, and not settling for a "one size fits all" approach.

- Recognition that policy and program responses need to be long term, with financial commitments which provide delivery certainty to enable outcomes to be achieved.

- Adopt an approach to valuing learnings and core knowledge through a "knowledge repository and clearing house" which captures and shares knowledge to draw on for future programs.

- Recognising that the fabric of community infrastructure is more than bricks and mortar, and requires relevant government departments involvement in planning and financing hard and soft infrastructure.

Summary of Recommendations and associated strategies

1. Establish a National Aboriginal and Torres Strait Islander Housing Strategy in parallel to a National Housing Strategy as an overarching framework for the State and Territory State Housing Plans, which are required under the NHHA.

2. COAG to formally demonstrate its commitment and leadership to a National Aboriginal Housing Strategy by including national housing Closing the Gap targets in the multilateral Housing and Homelessness Agreement, and state specific targets and funded actions to drive delivery of these targets from all agencies of Government and those non-government organisations providing homes and services to Aboriginal people.

3. That the principles and factors of success as outlined in this submission be adopted by Government and incorporated into a Tripartite Agreement between National Congress (on behalf of NATSIHA), the Commonwealth and State and territory Governments. This will demonstrate authentic commitment to Closing the Gap.

4. Establish and implement targets which increase the proportion of Aboriginal and Torres Strait Islander people living in safe and secure housing by 2028 to:

   4.1   Close the gap between the number and proportion of Aboriginal and Torres Strait Islander people and non-Indigenous people who are homeless by 2040
   4.2   Close the gap between the proportion of Aboriginal and Torres Strait Islander children and non-Indigenous children and young people who are homeless
   4.3   Close the gap between the proportion of Aboriginal and Torres Strait Islander children and non-Indigenous children living in out-of-home care by 2030 and
   4.4   Close the gap between Aboriginal and Torres strait Islander young people and non-Indigenous young people leaving out of home care and exiting into homelessness
   4.5   Close the gap between the proportion of Aboriginal and Torres Strait Islander people and non-Indigenous people living in overcrowded housing by 2028

5. Establish and model methodology for the distribution of funds for States and Territories for Aboriginal specific housing programs to ensure funding equity and other non-direct housing disadvantage[1].

6. Increase financial investment in early intervention and prevention services to sustain tenancies and prevent homelessness

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[1] Needs to be specifically allocated to Aboriginal organisations. NATSIHA must be involved in discussion and decisions for mainstream programs, planning and implementation.

7. Increase financial investment in services to support people who are homeless and assists them into safe and secure housing, and sustains tenancies

8. As a key pillar under the National Aboriginal Housing Strategy (see recommendation 1) establish an Aboriginal and Torres Strait Islander housing provider system, which includes participation by all States and Territories and includes a plan to return Aboriginal housing management and ownership to ACHPs in every jurisdiction by an agreed date. NATSIHA as the peak body to play a leading policy and advocacy role in this reform.

9. Prioritise, fund and support capacity building for the Aboriginal community housing sector (ACHP) sector and National and State Aboriginal housing peaks to promote sustainability of the ACHP sector and leverage growth.

10. Introducing an Aboriginal competency performance requirement into a tailored National Regulatory System for Community Housing to signal commitment and encourage adoption of improved ways of working with Aboriginal people[2].

11. Establish targets and investment in programs to increase home ownership rates for Aboriginal and Torres Strait Islander people following a review of the effectiveness of existing targeted programs aimed at raising home ownership rates among Aboriginal and Torres Strait Islander Australians

12. Establish and implement targets for targeted housing supply and delivery across the states and territories. This needs to adopt an approach which "stops the divide" between the rural, remote and the urban, i.e. adopt principles which recognise that we are one people.

13. Include design principles which suit the Aboriginal property standards for the environment and the community that the housing is being delivered in.

14. Undertake a comprehensive mapping process of the financial investment made by Commonwealth, State and Territory governments over the past 30 years to identify past investments and expenditures and to better understand the ownership status of Aboriginal housing supply.

15. Commit funds for an audit to accurately document the number of Aboriginal housing properties in each State and Territory so that properties and portfolios can be properly managed, maintained, developed, leveraged and divested to grow the portfolio and to provide Aboriginal housing.

16. Continue funding to improve the standard of housing in remote communities for a further 10 years

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[2] Alongside the adaptation of mainstream services, it is vital to recognise the essential role played by Aboriginal organisations in providing housing and related services to Aboriginal people

17. Lead the implementation of a community housing infrastructure needs survey which collects data on housing need, condition of the stock, and identifies any urgent maintenance, modifications and accessibility issues. Funds for identified urgent maintenance be released without delay to enable the upgrade of substandard housing[3].

18. Undertake an audit of the quantum of need to provide additional capital funding to address overcrowding and poor housing quality in social housing

19. Investigate how the Housing for Health methodology can be applied across Aboriginal and Torres Strait Islander communities where overcrowding is an identified health issue

20. Investigate and implement policies and legislation which facilitates rezoning capabilities to capitalise land rights and land ownings of Land Councils. This will facilitate the growth of the sector and unlock and leverage the land through partnerships for housing supply.

21. Investigate the viability across States and Territories of implementing policies for exemptions from rates and land taxes, to increase the financial viability of ACHPs.

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[3] Such a strategy should be supported by capital investment to respond to backlog maintenance and modifications requirements

Background to the issues and the current policy context

The Social Housing System in Australia

The social housing services system aims to provide low income people who do not have alternative suitable housing options with access to social housing assistance that supports their wellbeing and contributes to their social and economic participation. Some forms of social housing aim specifically to contribute to Aboriginal and Torres Strait Islander community wellbeing through improved housing outcomes, particularly in remote areas and discrete communities. The social housing services system seeks to achieve these aims through the provision of services that are: timely and affordable, safe, and secure meeting the needs of individual households, high quality and sustainable. Given that Governments aim for social housing provision and services to meet these objectives in an equitable and efficient manner it is also critical in the context of the Closing the Gap Refresh to ensure that housing policies and programs are also designed and delivered to also enable Aboriginal people to have connection to kin, community and culture.
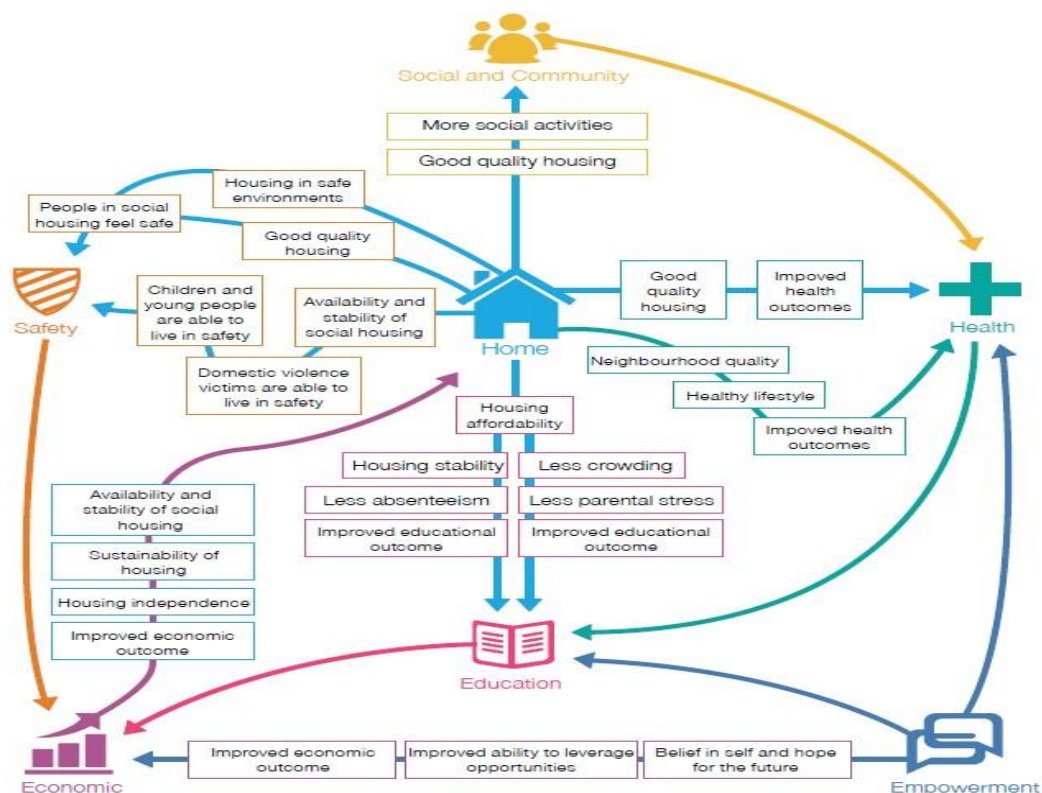
The diagram above taken from the *NSW Family and Community Services Human Services Outcomes Framework (2016)* is a model which clearly demonstrates the, interdependencies and connections between stable, affordable, quality, safe and secure housing and what can be achieved when this is in place. Housing is fundamental to individuals and families' social well-being, health, prosperity, economic participation, as well as connection to culture and place. Safe secure, well located and affordable housing provides a foundation to access opportunities and

pathways to education, training, employment and productivity, so is critical in terms of breaking the cycle of disadvantage.

Size and scope of social housing in Australia and the associated funding[vi]
As at 30 June 2017, nationally there were a total of 395,691 households and 417,736 social housing dwellings (excluding ICH)[4], comprising:

- 310,483 households and 319,913 public housing dwellings
- 9,574 households and 14,921 SOMIH dwellings — in 2017, SOMIH operated in NSW, Queensland, SA, Tasmania and the NT
- 75,634 households and 82,902 community housing tenancy rental units.

Table 1 State and Territory government net recurrent expenditure on social housing (2016-17 dollars) ($million) [a]

	NSW	Vic	Qld	WA	SA	Tas	ACT	NT	Aust
2016-17	1 298.6	530.6	575.5	781.5	424.5	102.8	117.4	85.8	3 916.7
2015-16	1 211.2	542.1	560.4	723.4	446.2	104.1	118.7	78.4	3 784.6
2014-15	1 241.1	578.1	608.0	699.0	448.7	112.1	116.2	84.6	3 887.9
2013-14	1 374.7	505.1	515.6	754.0	423.8	148.4	115.7	84.9	3 922.4
2012-13	1 285.2	498.3	571.8	809.8	468.3	146.7	117.4	81.4	3 978.9

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Source: State and Territory governments (unpublished); from Report on Government Services 2018

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[4] The NT commenced data reporting for its SOMIH program in 2016-17. Limited aggregate data are available and include the number of dwellings (5032), but not the number of households. These dwellings were not included in administrative data collections used in this Report for 2015-16 and previous years following their transfer from ICH management in the period 2008–2010.

Closing the Gap should recognise the value and opportunities that a Holistic and Integrated Housing System can bring and how it is critical to respond to the changing needs of individuals and communities

It's critical that the housing system provides culturally appropriate accommodation and housing products and services to meet the housing needs of Aboriginal and Torres Strait Islander people and facilitates their movement and pathways across and through the housing tenure types as their needs change.

The housing continuum

Crisis — Social — Affordable rental — Private rental — Assisted Home Ownership — Home Ownership

(diagram source: QCOSS 2018 and the Property Council 2017)

The term housing continuum is used broadly in the housing strategies of most Australian State and Territory governments, but what does the term mean?

The 'housing continuum' is a concept used by policy makers to consider the broad range of responses available to help a range of households in different tenures to access affordable, safe and secure housing. The concept enables policy makers to move away from a one-size-fits-all strategy of providing public housing, towards 'the range of housing options available to different households on a continuum.'

The housing continuum concept directs policy makers to consider housing responses through the following dimensions:

- policy makers consider housing responses for a diverse range of households, from people experiencing homelessness through to social housing tenants, first home buyers and beyond;
- Policy makers consider a diverse range of responses for any one household over their lifetime. By considering the entire housing continuum, policymakers are better placed to respond to instability and sudden changes in a household's tenure. For example, a household at risk of homelessness might be best served by going into crisis accommodation temporarily, before attaining a rental bond loan to secure housing in the private rental market;
- the term recognises that there is interconnectedness between different housing responses and that responses don't work in isolation. For example, a policy boost for first home buyers may increase house prices in a particular price range and reduce available properties for renters.

In 2009 the Western Australia Social Housing Taskforce identified that '*different housing tenures and forms of assistance do not exist in isolation from one another,*

but are interconnected and have an important influence on one another. Households do not transition through the different parts of the continuum in a linear manner but move between them depending on their life circumstances and housing need at a particular point in time'. (source: QCOSS Housing Policy Review 2018).

The model below outlines the interconnectedness between different products and tenure types within and across the housing system. It is critical that Closing the Gap Refresh considers the existing frameworks and policies in relation to the housing continuum and across different housing models which are designed to address a diversity of needs in diverse communities.
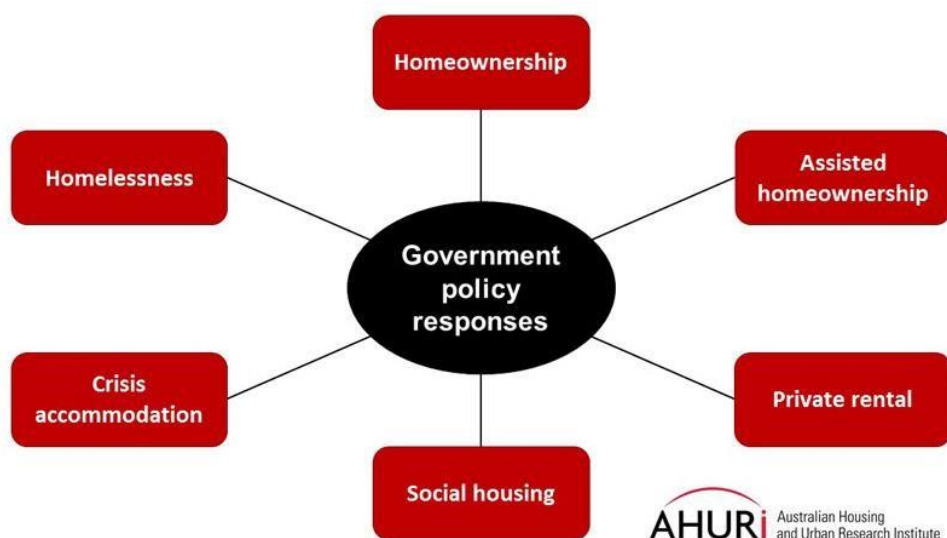
Housing Models and housing design should be innovative and responsive to meet the changing needs of individuals and communities

Further, Closing the Gap refresh must also consider the housing needs of people with disabilities and people who are ageing, and recognition of the associated costs and cross government policy responses which are needed to effectively meet these needs, particularly in rural and remote communities.

This concept needs to explore the different housing models, designs and supports that are needed to meet specific needs, and the principles of self-determination, engagement, co-design and client choice should be adopted in the development and delivery of specialised housing. Housing should be designed and modified to provide for people with disabilities and for people who are ageing and should also be culturally appropriate. Universal accessible design principles and best practice design standards should be applied and budgeted for so that homes can accommodate people's changing housing needs. For homes that require modification to enable residents to age in place or remain in the community, these should be priorities with adequate funding available to facilitate such modifications. Too often we hear of residents who need to move out of their home due to unmet

adaptations being carried out or are compelled to live in unmodified and substandard homes. Policies should consider the differing environments and requirements, e.g. Climate and noise.

Further, capital programs should adopt specific design and locational criteria and principles to ensure that housing is delivered close to amenities, services and transport where possible. Location of properties has a strong bearing on people's capacity to access education, employment and participate in their community. This applies to modified homes, or homes that are designed specifically for people with disability.

Overall, housing needs analysis undertaken using meaningful and current data is critical in planning, so that there is a diversity of properties that will meet the changing needs of communities. This will require the Reporting for the NHHA to be disaggregated so that there is transparency and accountability across states and territories to specify housing and homelessness strategies and resources allocated specifically for Indigenous people as priority cohorts.

Reporting needs to provide data that is valuable, accurate and meaningful- and not reporting just for reporting sake. Reporting needs to identify what is meant by an outcome. There needs to be a feedback process to providers that providers can use this to inform and influence their platform, their services and their strategy. The diagram below outlines a model of the role of housing and homelessness sector services in pathways to secure housing. This model assumes that households need to go through these pathways to secure housing and achieve non-housing outcomes, such as access to education, training and employment.
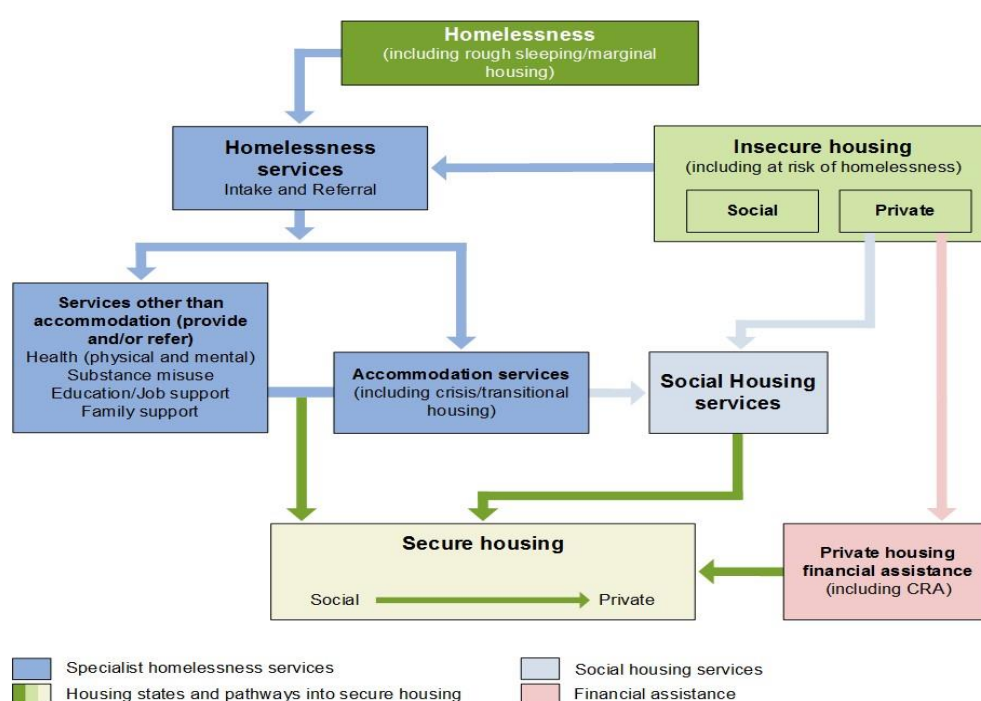
(source: Productivity Commission 2018)

However, other models such as the Housing First approach have proven effective in many jurisdictions across Australia and overseas. Housing First is a relatively recent innovation in human service programs and regarding treatment of people who are homeless rather than moving them through different "levels" of housing, whereby each level moves them closer to "independent housing" Housing First moves the homeless individual or household immediately from the streets or homelessness into their own accommodation. Housing First approaches are based on the concept that a homeless individual or household's first and primary need is to obtain stable housing, and that other issues that may affect the household can and should be addressed once housing is obtained. In contrast, many other programs operate from a model of "housing readiness" — that is, that an individual or household must address other issues that may have led to the episode of homelessness prior to entering housing. Such models are appropriate for people who are exiting custody or leaving out of home care so that they do not exit into homelessness or insecure housing.

First and foremost is the fundamental Right to Housing

The current Closing the Gap does not include a target for housing. There is an opportunity for Commonwealth, State and Territory Governments to increase accountability and performance in the delivery of responsive policies and programs which end homelessness and meet housing needs through the negotiations of the National Housing and Homelessness Agreements. These Agreements require each State and territory to deliver housing strategies or plans to deliver agreed targets.

It's important in this advocacy to highlight that the right to housing is recognised in a number of international human rights instruments. Article 25 of the Universal Declaration of Human Rights recognises the right to housing as part of the right to an adequate standard of living. It states that:

" Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control. "

Article 11(1) of the International Covenant on Economic, Social and Cultural Rights (ICESCR) also guarantees the right to housing as part of the right to an adequate standard of living. In international human rights law the right to housing is regarded as a freestanding right. This was clarified in the 1991 General Comment no 4 on Adequate Housing by the UN Committee on Economic, Social and Cultural Rights. NATSIHA strongly advocates for the right to housing for Australia's first nations people. In preparing this submission one participant commented

"Due to colonisation and dispossession we are Australia's first homeless people and the situation has got worse"

Aboriginal and Torres Strait Islander households are half as likely to own, or be buying, their own homes as non-Indigenous Australians and twice as likely to be renting.vii One in five Aboriginal and Torres Strait Islander households (21.5 per cent) live in social housing, compared to just 3.6 per cent of non-Indigenous households.viii Aboriginal and Torres Strait Islander Australians are over-represented among the users of homelessness services and much more likely to experience family violence than non-Indigenous people.

Housing Disadvantage amongst Aboriginal and Torres Strait Islanders is well documented, and the situation is declining

Housing disadvantage among Aboriginal and Torres Strait Islander households is well documented, yet the current Closing the Gap strategy has no housing targets at all. Home ownership is not mentioned once in the most recent Closing the Gap report (2018) and the sole housing indicator which it reports relates to overcrowding in remote communities. (source: CHIA Closing the Gap submission 2018)

Housing is a complex system of inter-connecting causes and effects, and the system is broken. Housing affordability is in decline with escalating housing costs, widespread housing stress, long social housing waitlists and high levels of homelessness. Despite this urgent need, policy responses are fragmented with "both Commonwealth and state/territory governments need(ing) to develop coherent and long-term policy frameworks to provide housing across the full spectrum of need", (Troy, Randolph, et al, 2018).

Housing is more complex than bricks and mortar and provides multiple benefits

Housing is more than physical shelter; it allows safety, security, privacy, identity and social inclusion. Access to affordable housing is a foundation on which people can build stable, socially engaged and productive lives. Stable and affordable housing positively influences the welfare of households, including health and wellbeing, education, employment, economic and social participation outcomes. The benefits for Aboriginal and Torres Strait Islander people include connection to land, to culture, to community and place.

Australian housing is a complex, interconnected social, economic and political system, involving individual, community, business and government values and choices. This is impacted by a range of social and economic policy measures including employment, transport, taxation and income support, as well as traditional housing policy areas of rental tenancies, housing finance and construction and social housing. As a result, housing needs a holistic, integrated and comprehensive policy

response. Access to stable, affordable and accessible housing is under significant, sustained pressure. (QCOSS, 2018)

As noted in the ACHIA submission to Closing the Gap - The accessibility, security, condition and location of housing have a significant effect on the development of human capital. In a recent report exploring the links between housing and productivity, (Maclennan et al 2018)[ix] the authors clearly illustrated the impact that housing can have on an individual's wellbeing and prospects, and thus on achieving wider targets, such as those on which Closing the Gap is centred.

In Gibb 2017[x] three national outcomes dependent on a well-functioning housing system are identified. In summary these are:

• longer healthier lives

• Sustainable places close to jobs, services and amenities people need

•Strong resilient communities

Specifically, there is substantial evidence to demonstrate the link between overcrowded, poor quality housing and slower childhood development and lower school performance. Dockery[xi] identified a list of housing characteristics that could account for levels of child development and school attainment including: cleanliness, housing disrepair and safety; opportunities for outdoor play; crowding, affordability and frequent residential moves, and homelessness. Of these indicators, crowding was found to have the largest negative impact on children's learning outcomes. While overall, the Australian studies showed relatively minor health impacts on children from these housing characteristics (possibly reflecting the relatively high quality of housing in Australia) there was a notable exception for Aboriginal children. The researchers found that Aboriginal children have markedly worse housing circumstances compared to non-Aboriginal children.

Poorer health outcomes were generally attributable to the physical standard of housing while school performance and social / emotional outcomes were associated with crowding levels, being in financial stress, moving frequently and living in disadvantaged neighbourhoods. As well as affecting children, at any age an individual's housing circumstances will impact on outcomes such as health, longevity, and labour force participation.

There is considerable research linking health and housing throughout a person's life cycle. Mallett et al (2011) identify the links between poor quality but expensive homes and poorer health, including mental health. Apart from the more obvious impacts of poor health on employment, insecure housing has been shown to inhibit individual's seeking paid work[xii]. Housing quality also has a locational component - both the neighbourhood's characteristics and how close the place is to jobs and services. Pawson et al (2015) in a major report highlighted the impacts on individuals of living in spatially disadvantaged places including the concentrations of poverty, levels of crime and antisocial behaviour and stigma associated with living in the locality. Housing must therefore be recognised as one primary foundation which contributes to the success of the all other seven indicators in Closing the Gap.

Building the sustainability of the Aboriginal Community Housing Sector is critical to success to Closing the Gap

There are compelling arguments supported by evidence to strengthen and grow the Aboriginal community housing sector. Currently, across Australia there are 328 Aboriginal community housing providers (ACHPs), also known as Indigenous community housing organisations (ICHOs) two-thirds of which receive government funding.[xiii] Many are small and have less well-developed organisational governance, workforce capability and business systems than across the rest of the community housing sector.[xiv] Organisational scale and operating subsidies are inadequate to address tenant need and cover the costs of service provision, especially in the north of Australia where operating costs are high. Not surprisingly, one in three dwellings held by funded ICHOs was untenanted in June 2016.[xv] The proportion of untenanted dwellings is highest in Queensland (40.3 per cent or 2,077 dwellings) and New South Wales (26.4 per cent, or 790 dwellings). Some of these properties will be in areas of low demand, or not be economical to repair or replace. However, asset management strategies to bring untenanted properties back into service where feasible and cost-effective could resolve some of the overcrowding and improve longer-term viability of ICHOs.

If ICHOs are to secure their futures and protect their existing assets, they need to explore ways to consolidate their operations and build scale, without losing the advantages of local engagement and branding.[xvi] The benefits to tenants will be more, and better, housing. Communities will also be able to retain important assets. This is an area in which government could work with community housing peak bodies to build ICHO capability. Capital investment to support organisational reform, bring properties back into service and grow the capacity of these organisations to own, manage and grow rental stock would create long-term benefits. (source: CHIA Closing the Gap submission 2018)

Given the pivotal role that Indigenous community housing providers or Aboriginal Community Housing Providers play in the planning and delivery and management of housing for Aboriginal people across Australia, it is important that Government recognises their value and invests in their capacity to grow, leverage their assets, and provide quality tenancy and property management across their portfolios. Aboriginal outcomes are improved when services are delivered in culturally appropriate ways, including in the context of housing. There is also recent evidence that finds that that mainstreaming approaches to service provision across several jurisdictions have been inappropriate and/or ineffective for many Indigenous tenants and have also constrained or burdened service providers (Habibis et al. 2016; Milligan et al. 2011).

This research has recommended an overarching approach that acknowledges and respects Aboriginal cultural norms and adapts practice. To help do this mainstream service should build and maintain close working relationships with Aboriginal organisations, recruit and support more Aboriginal staff and strengthen their own cultural competency.

As one instance, introducing an Aboriginal competency performance requirement into the National Regulatory System for Community Housing would signal commitment and encourage adoption of improved ways of working with Aboriginal

people. Alongside the adaptation of mainstream services, it is vital to recognise the essential role played by Aboriginal organisations in providing housing and related services to Aboriginal people.

As highlighted in a comprehensive Inquiry into the capacity of the affordable housing system (Milligan et al 2017) priority should be given to attaining more effective and enduring Aboriginal engagement across the whole housing support system and to safeguarding and improving the viability of Aboriginal housing organisations. Importantly, that Inquiry also underlined that housing responses to meet Aboriginal people's needs should be better integrated with other Aboriginal 'closing the gap' strategies. Although considerable challenges for the Aboriginal housing sector remain in NSW, with the support of the NSW Aboriginal Housing Office, Aboriginal Community Housing Providers are in a position to help Close the Gap on Aboriginal housing disadvantage and hence contribute to greater Aboriginal wellbeing.

Aboriginal community housing providers as well as State and Territory governments have primary responsibility for delivering social housing services either directly through public housing and state owned managed Indigenous housing (SOMIH) or through funding community housing providers. ICH is generally managed by ICH organisations (although some ICH dwellings are managed by State and Territory housing authorities). State and Territory governments assumed responsibility for administering ICH in urban and regional areas, however arrangements varied across jurisdictions.

Feedback received from ACHPs in preparing this submission strongly advocates for Government to revisit its approach to registration of Aboriginal community housing providers under the National Regulatory Scheme for Community Housing (NRSCH). The existing NRSCH system will be undergoing a review in coming months and this presents a timely opportunity for this review to take a close look at why the system isn't working and the low numbers of registered ACHPs. Without registration status and ongoing compliance, this will present impediments for capacity building, growth and will minimise opportunities for ACHPs to apply for grants or funding opportunities, which in turn will further impact on their businesses and the community.

Advocates are calling on Government to consider registration and regulation in a National Aboriginal Housing Strategy. This could include resources and strategies which provide capacity building and industry development across the Aboriginal community housing sector to facilitate flexible approaches to achieve appropriate registration and standards, but which also align with principles of self - determination, and which include greater emphasis on cultural factors and cultural competency. This approach also needs to recognise the unique environments and circumstances in each of the States and Territories and recognise their strengths and barriers.
NATSIHA strongly supports working with Government in the development of a policy and mechanisms that achieve these principles and maintains a high standard of cultural competency. Models which can be learned from include the APONT – Aboriginal Management and Governance Program in the Northern Territory.

As a key pillar under the National Aboriginal Housing Strategy (see recommendation 1) NATSIHA strongly asserts the need for Closing the Gap refresh to establish an Aboriginal and Torres Strait Islander housing provider system, which includes participation by all States and Territories and includes a plan to return Aboriginal housing management and ownership to ACHPs in every jurisdiction by an agreed date. The current status of Aboriginal community housing provision, policy and delivery across Australia does not align with principles of self-determination and Aboriginal control and capacity building for sustainability. The Northern Territory and South Australia and Western Australia are jurisdictions where this disparity impacts the service system most, given there is none or little Aboriginal community controlled Aboriginal housing system. NATSIHA as the peak body will play a leading policy and advocacy role in this important reform.

Transparency and engagement in funding allocation and program design

NATSIHA further asserts that Closing the Gap includes targets and strategies to ensure equity and transparency in funding administration and commissioning, which should include to:

- establish and model methodology for the distribution of funds for states and territories for Aboriginal specific housing programs to ensure funding equity and other non-direct housing disadvantage[5].
- ensure this funding be specifically allocated to Aboriginal controlled organisations.
- ensure that NATSIHA is involved in discussion and decisions for mainstream programs, planning and implementation. This methodology should be adopted by mainstream providers to ensure accountability and transparency of delivery and for any COAG arrangements for mainstream funding the housing peak body needs to be involved.
- Ensure that policy, programs, implementation and funding should also have the flexibility for communities to have the ability to focus on their own priorities and challenges and not those of governments and bureaucracy. This is about flexible and localized design that achieves the outcomes.
- ensure that state and territory funded programs for Homeless strategies and initiatives have a clear and specific focus on Aboriginal and Torres Strait Islander people and communities and there is genuine engagement with Aboriginal and Torres Strait Islander people and communities in design and implementation planning.

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[5] Australian Government funding for services under the NAHA was $1.7 billion in 2016-17 and is included in total State and Territory government net recurrent expenditure for housing and homelessness services. State and Territory government capital (non-recurrent) expenditure for social housing was $1.3 billion in 2016-17.

Demand for Housing is increasing; Housing Stress is on the rise and is putting households at risk of homelessness

Housing stress is defined as ownership or rental housing costs being "at least 30 per cent of income" for "households in the bottom 40 per cent of the income distribution" (Yates & Milligan2007). AIHW Australia's welfare 2017report, indicates that "Across all capital cities, both the median house and unit price exceeded the calculated maximum affordable dwelling price for the median income rental household", (2017a). National Shelter's November 2017 Rental Affordability Index indicates that across Australia:

- The single pensioner household is facing Severely Unaffordable and Extremely Unaffordable rents...
- Housing pressures are likely to be compounded by a range of other pressures, including healthcare costs associated with ageing.
- The couple pensioner household is facing Unaffordable and Severely Unaffordable rents.
- Adding to the financial pressure on this household are several other costs, which may include health care costs associated with ageing.
- The single person on benefits household is untenable, with a person
- needing to pay at least 60 per cent of his/her income on rent across all metropolitan areas
- For the single parent household rents are almost entirely Severely to Extremely
- Unaffordable across all metropolitan areas. Childcare and healthcare costs may potentially compound the financial stress on this rental household.
- The student share house looking to locate in the inner and middle suburbs of metropolitan areas faces Severely Unaffordable to Extremely Unaffordable rents. (National Shelter, 2017)

The Productivity Commission's March 2018 inquiry report on 'Introducing Competition and Informed User Choice into Human Services: Reforms to Human Services' states: "*Australia's social housing system is broken. Eligible tenants have little choice over the home they live in and can face a lengthy wait to access housing, and the type and amount of financial assistance available to households is inequitable.*" (PC, 2018)

Demand for social housing is strong. As at 30 June 2016, there were around 195,000 households on social housing waiting lists. Both the waiting lists themselves, and the wait times for many households, are very long. As at 30 June 2016, 47% of households waiting for public housing had been doing so for more than 2 years." (AIHW, 2017a) *"When it comes to social housing allocations, there are often limited choices for new entrants into the social housing system regarding selection of dwelling type and location. Tenant choices are often limited to broad geographic areas and/or types of dwellings. For example, public rental housing tenants often are given a limited number of offers at the time of allocation and if refused, they may risk their place on the waiting list.*" (AIHW, 2018).

Across Australia there are 196,000 households waiting for social housing, and these lists continue to grow as the stress on the system grows and demand for social housing increases, as thousands of individuals and households are squeezed out of the private rental market. Social housing providers allocate high needs applicants from the top of the waitlist, (some of whom experience mental illness and substance use disorders), and then proceed to evict those same tenants when their mental illness or substance use disorders manifest "The actions for which the household is evicted may be the very reasons for which they were originally housed." (Jones, Phillips, et al, 2015)[xvii]

Homelessness is more than roofless-ness comprising more than just 'rough sleepers' Homelessness is when a person is experiencing insecure or unsafe accommodation, ranging from sleeping rough, to staying in boarding houses or 'couch surfing' with family or friends. On census night in 2016, more than 116,000 Australians were estimated to be homeless, up from 102,000 in 2011, (ABS, 2018). "In 2016–17, specialist homelessness agencies provided assistance to an estimated 288,273 clients, equivalent to 1 in 84 people." (AIHW, 2018).

The Productivity Commission 'Report on Government Services 2018' states that "Nationally in 2016-17, 30.2 per cent of clients with an identified need for accommodation did not have this need met, an increase from 22 per cent in 2012-13. A further 179 unassisted requests a day for accommodation services were made on average nationally in 2016-17, maintaining an annual decrease from 296.7 in 2012-13. Nationally in 2016-17, clients with unmet demand for services other than accommodation accounted for 3.9 per cent of the total demand for those services. A further 69.9 unassisted requests a day for services other than accommodation were made on average nationally", (2018c).

Aboriginal People are over represented in homelessness and overcrowding so there's an urgent need for safe, affordable and social housing supply, as well as early intervention programs and support services to those in need

Aboriginal and Torres Strait Islander people are just less than three times more likely than non-Indigenous people to live in housing which does not meet the international standard for overcrowding.[6] Alarmingly, the proportion of individuals living in such housing in remote areas is 38%, which is significantly higher than the national figure of 10.4%.[7] Much of the accommodation provided to Aboriginal and Torres Strait

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[6] ABS, "Housing," *NATSISS 2014-15* (4714.0).
[7] Ibid.

Islander people is also barely fit for habitation, with reports of dilapidated housing, insect infestations and lack of utilities being common.

Access to safe and secure housing is a fundamental right which is central to the ability of Aboriginal and Torres Strait Islander people to exercise self-determination and independence. Living in overcrowded housing with little to no privacy frequently breeds interpersonal tension, potentially leading to an increased risk of family challenges.

Furthermore, poor housing conditions frequently contribute to the development and exacerbation of mental health conditions, and feelings of forced poverty, worthlessness or hopelessness. Overcrowded housing also has a significant impact on educational attainment and physical health, for example, in relation to control of infectious diseases.

Ensuring that Aboriginal and Torres Strait Islander people have access to safe and secure housing is vital to ensuring that they have the ability and opportunity to exercise independence and improve their lives. We note that this will require not only a substantial infrastructure investment, but also outreach programs to ensure that there is substantial community buy-in and investment in overseeing and maintaining new housing developments.

The rate of Aboriginal homelessness is far higher than for non-Aboriginal people. The respective national rates of homelessness per 10,000 population in 2016 were 361 and 38. Thus, the Aboriginal homelessness rate remains ten times that experienced by the non-Aboriginal population. This is a national disgrace.

National Shelter's policy positioning statement 2018 on Aboriginal housing and homelessness highlights several sobering facts about the situation for Aboriginal and Torres Strait Islander people in terms of homelessness and overcrowding. Aboriginal and Torres Strait Islander peoples make up 3% of the general population but hold 18.3% of social housing tenancies and constituting 25% of the clients accessing specialist homelessness services in 2016–17: an estimated 64,644 clients. In 2016 15% of Aboriginal and Torres Strait Islander households in rural areas were deemed to be overcrowded, compared to 9.0% in urban areas. Indigenous Australians face complex struggles in all jurisdictions and without trying to over simplify those complexities there are two key areas that must be addressed by national policy – urban housing and rural/remote housing.

The majority (79%) of Aboriginal and Torres Strait Islander households are urban and the focus of much policy and program development is on housing for people in remote communities. NATSIHA echoes National Shelter's acknowledgement of the depth of housing shortage in remote communities and the success of the Remote Partnership on Housing, which is a major infrastructure program, mainly across the remote north of Australia which should link to the Northern Australia Infrastructure Facility and policy. The housing and infrastructure requirements of Aboriginal and Torres Strait Islander peoples and communities are acute in every area of Australia. Given that o*vercrowding disproportionately impacts Aboriginal and Torres Strait Islander communities, resulting in increased health risks and is not limited to remote*

areas, this requires targeted and tailored polces in partnership with agencies such as Health.

Aboriginal and Torres Strait Islander people account for 20 per cent of all Australians experiencing homelessness. A safe and secure home improves health outcomes and can have positive impacts on people's ability to work, study and engage in community life. Efforts to address homelessness and overcrowding in Aboriginal communities have been welcome, but are often short term, or subject to frequent changes (for example, the recent decision not to renew the National Partnership Agreement on Remote Indigenous Housing). Setting a target to close the gap in homelessness and provide people with safe and secure homes could encourage a longer term sustainable funding approach to addressing the housing needs of Aboriginal people. It is estimated that a model that may be referenced for this purpose is The Victorian Aboriginal Affairs Framework which already includes measures of the number of people who are homeless.

Further models that can be drawn on include the Wilcannia Overcrowding Project, which the NSW Aboriginal Housing Office and NSW Health are currently partnering to deliver the Wilcannia Overcrowding Project. The project utilises the Housing for Health methodology to improve living conditions for tenants experiencing severe overcrowding. The focus of the program is on environmental changes that lead to maximum health gains – for example safety, hygiene, waste water disposal, food preparation and storage and ambient temperature.

Greater focus on culturally appropriate supportive housing and early intervention, service co-ordination to support wrap around services, service continuity through long-term agreements, connected services that provide seamless pathways to better understanding the contemporary needs of our women, children escaping family and domestic and family violence, youth and all vulnerable families and being mindful of families affected by drug and substance abuse, mental and chronic health. Aboriginal and Torres Strait Islander peoples still suffer the effects of Stolen Generations, stolen wages, victims of institutionalised sexual abuse, race discrimination and discrimination in many other forms, lack of access to health, employment, education, as well as the impacts of child safety related issues and inter-generational poverty.

Need for targeted efforts to address overcrowding through delivery of affordable housing supply

Whilst it is acknowledged that The Australian Government's investment of $5.5 billion to improve overcrowding in remote communities has reduced overcrowding from 52 to 37 per cent over the past ten years, there is still much to be done.[xviii] This will require significant capital investment for a further 10 years to significantly turn the curve, especially in, but not only to remote communities. Investment and targeted

effort to address overcrowding across urban and rural communities is also critical, given Aboriginal and Torres Strait Islander households experience almost three times the level of overcrowding of non-Indigenous households.[xix] Almost 20,000 Aboriginal and Torres Strait Islander households in urban areas and 6,500 households in rural areas need at least one more bedroom.[xx]

Overcrowding is more severe in public housing, where 8.3 per cent of Aboriginal and Torres Strait Islander households were overcrowded in 2016 but it is also a problem for 6.4 per cent of Indigenous households in community housing.[xxi] Relatively modest investment under a refreshed Closing the Gap strategy could make a significant improvement to housing quality and life outcomes for tens of thousands of families in non-remote areas. (source: CHIA submission to Closing the Gap)

Prevention of acute diseases, such as rheumatic heart disease and scabies can be achieved if overcrowding is addressed. It is a national shame and shocking concern that in 2018 we are still responding to the management and treatment of such diseases, which are caused by poverty and overcrowding factors. It is acknowledged that the 2018 Federal budget allocated funds for the treatment and prevention of scabies, but this is inadequate, and until issues of poverty and overcrowding are addressed this response is simply a band aid.

Aboriginal and Torres Strait Islander people represented 87% of clients on Queensland's Rheumatic Heart Disease (RHD) Register in 2014. Whilst Rheumatic heart disease has been almost eliminated from non-Indigenous communities. It is largely preventable, being a disease of poverty and overcrowded housing conditions. Effective prevention will require action from multiple sectors outside health. It is a national disgrace that this disease continues amongst our Indigenous people. RHD is the result of repeated cases of acute rheumatic fever caused by an infection – Group A streptococcal bacteria. It results in chronic damage to the valves in the heart and is a lifelong burden for people, who usually contract it during childhood. Effective treatment requires early detection and long term clinical follow-up for years. Indigenous Australians are eight times more likely than non-Indigenous Australians to be hospitalised for these conditions. NATSIHA calls on the Government to invest in addressing overcrowding not only for housing outcomes but for the health of Indigenous Australians, and to prevent this ongoing suffering and cost to the community.

Home ownership rates amongst our people need to Increase

In recent years housing in Australia has evolved beyond the provision of a home. Firstly, home ownership has become financial security for retirement, (to supplement or replace support from family or the age pension), which saw significant growth in home ownership in Australia post WWII. More recently housing has now become a significant investment commodity. This initially evolved from the financial security function but has been significantly accelerated by financial deregulation and generous tax treatment through policies such as negative gearing. The continued application of this policy across Australia continues to adversely impact those who

cannot access or afford housing, and for Aboriginal and Torres Strait Islander people they are most affected due to levels of disadvantage and barriers which need to be overcome.

Since 1970, Australia's median real house price has almost quadrupled while real wages have only doubled. This resulted in a doubling of the Australia wide dwelling price to income ratio to a present value of around six to seven." (Yates, Ong, et al, 2017)

We strongly support the assertions made by CHIA's submission to Closing the Gap which states improving home ownership outcomes should be a priority in the refresh of Closing the Gap. Through home ownership, Aboriginal and Torres Strait Islander households can gain secure tenure, take control of their own futures and build their economic resources over time.[xxii] It enables them to share the wealth creation opportunities enjoyed by other Australians who have benefited from strong housing markets over the past two decades.

Yet Aboriginal and Torres Strait Islander Australians continue to be locked out of home ownership – just 12.2 per cent own their homes outright, 25.9 per cent have a mortgage and 32.4 per cent are renting privately.[xxiii] The focus on resolving land tenure issues and completing township surveys to facilitate home ownership in remote areas has been necessary, but has perhaps distracted governments from thinking about how to lift overall home ownership rates among Aboriginal and Torres Strait Islanders.

Not all Aboriginal and Torres Strait Islander people will aspire to home ownership and not all who do so will be able to achieve it. Barriers include high unemployment, lower household incomes, and lack of information about financial options. Some of these barriers will take many years to overcome. However more can be done to help Aboriginal and Torres Strait Islander households own their own homes, particularly in regional areas. For example, Indigenous Business Australia's dedicated home lending program is a valuable but relatively small-scale strategy. Increasing the rate at which IBA moves its mortgagors into the wider financial services system may be one way to increase the number of households which IBA assists into home ownership. Positioning IBA as the front door to the banking system could also open a broader array of financial services of benefit to Aboriginal and Torres Strait Islander households. Strategies which can be adopted to drive this target include the provision of culturally appropriate rental, mortgage and financial literacy advice and programs to incentivize home ownership and improve home ownership rates.

Further, a review of Indigenous take-up of shared equity or affordable home ownership programs such as Key Start (WA), Home Start (SA) or the Homes Vic pilot program could also reveal which strategies are most effective in boosting home ownership. Other models, such as community land trusts are also worth exploring. (CHIA, 2018)

Assets should be considered as homes and not just assets and should be well maintained

NATSIHA strongly submits that ACHPs need to have a clear understanding of the condition of Aboriginal housing assets and Government should resource the development a plan and identify resources to bring properties up to acceptable standards or "dwelling condition".

Dwelling condition' is defined as the proportion of households living in dwellings that meet agreed minimum acceptable standards. A dwelling is assessed as meeting minimum acceptable standards if it has at least four working facilities (for washing people, for washing clothes/bedding, for storing/preparing food, and for removing sewerage) and not more than two major structural problems.

Nationally in 2016,in the national tenant survey (reported on by the Report on Government Services 2018), the majority of social housing respondents lived in dwellings of an acceptable standard, though proportions were lower for Aboriginal and Torres Strait Islander households: for public housing, 80.7 per cent for all households and 69.6 per cent for Aboriginal and Torres Strait Islander households, for SOMIH, 75.1 per cent for all households, for community housing, 88.8 per cent for all households and 77.2 per cent for Aboriginal and Torres Strait Islander households.

Households with a member with disability were also less likely to report living in dwellings of an acceptable standard (73.9 per cent in public housing, 70.2 per cent in SOMIH, and 86.1 per cent in community housing)

NATSIHA calls for the Closing the Gap refresh to include a strategy for Governments to lead the implementation of a community housing infrastructure needs survey – which collects data on housing need and condition of the stock and identifies any modifications and accessibility issues. Such a strategy should be supported by capital investment to respond to backlog maintenance and modifications requirements.

Given that millions of dollars have previously been invested in infrastructure for building Aboriginal housing, which have been seized back by Government, there is also a need to undertake a comprehensive audit of Aboriginal targeted housing to determine the location, size and type of dwellings that are available in the system. Further, there are multiple examples across states and territories of high value Aboriginal properties (circa $1M plus) being compulsorily transferred from Aboriginal ownership and control back to the States/territory governments, and in return the Aboriginal community housing provider is given properties in poor locations which are of very low value. The extent and monetary value of this "theft" of Aboriginal assets from communities has never been properly analysed or documented. Minister Scullion has expressed his support of a comprehensive mapping process to be undertaken, including mapping of the financial investment made by Commonwealth, State and Territory governments over the past 30 years to identify past expenditures and to better understand the ownership status of Aboriginal

housing. It is shameful and very concerning that the internal transfers of the Aboriginal estate have occurred with no accountability.

This process should also identify any Caveats or registered interest on a property and whether this should remain or be lifted. It is understood that past policies in some jurisdictions applied caveats and registered interests in properties by Government due to minor maintenance funding being invested properties. It is understood that under NPARIH policy ACHPs which received an investment for a property were obligated to come under the One Social Housing policy, which also led to loss of the right of the ACHP to choose the next tenant following a vacancy. This type of policy is akin to holding ACHPs hostage and treating them with disdain and certainly goes against the type of principles of self-determination and Aboriginal control that we strongly advocate for in an effective Aboriginal housing system.

Addressing Discrimination in the Private Rental Market

As highlighted in CHIA's submission to Closing the Gap discrimination in the private rental market (especially in regional areas) means that Aboriginal and Torres Strait Islander people can be denied access to affordable housing, even in regional areas where market rents can be less than income-based rents charged in social housing. Discrimination in the private rental market means even those on relatively high incomes can struggle to find a home. This increases demand for social and affordable housing and puts additional pressure on that part of the system. Addressing discrimination in the private rental market is an obvious omission from the current Closing the Gap strategy which needs to be addressed. This will require direct engagement with the property management industry as well as with State and Territory governments responsible for tenancy law.

Need for coordinated and integrated policy frameworks and planning

NATSIHA strongly supports the submission made by National Congress to The Closing the Gap Report and we also urge Government to take this opportunity to learn, reflect and to act, and not to be complacent. A focus on the actual wellbeing of our peoples instead of surface-level outcomes is sorely needed.

NATSIHA is seriously concerned by the enormous disparities which exist between Aboriginal and Torres Strait Islander people living in remote and regional communities and those living in major cities. The Aboriginal and Torres Strait Islander child mortality rate, for instance, is 339.2 per 100,000 in the Northern Territory, more than four times the national average for non-Indigenous children.[8] Similarly, there is a 46.8% gap in the proportion of Indigenous and non-Indigenous

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[8] AIHW, Aboriginal and Torres Strait Islander Health Performance Framework Report 2017, dataset 1-20 (Infant and Child Mortality) (2017).

children attending school 90% or more of the time in very remote areas.[9] We stress that a myopic focus on national statistics has led to a failure to account for the particular needs of Aboriginal and Torres Strait Islander peoples living in remote and regional communities. Local solutions, based on the expertise and experiences of community members, must play a greater role in the refreshed Closing the Gap Strategy.

NATSIHA also support National Congress's point which highlights that the benefits offered by Aboriginal and Torres Strait Islander community-controlled organisations, such as community engagement, cultural competence and safety and the ability to engage local expertise and knowledge cannot be quantified in monetary terms and must be considered. Mainstream organisations frequently lack the capacity, knowledge and cultural competence required to effectively deliver services to our communities. Furthermore, many organisations lack specific knowledge about the social and cultural requirements of our communities, leading to a lack of trust and unwillingness amongst our peoples to engage with vital services such as medical care and education.

In the context of housing and homelessness there are clear case studies of Aboriginal and Torres Strait Islander people who have been at risk of homelessness due to complex needs, mental health issues, family breakdown or financial difficulties and they have not had the confidence or trust or relationship to reach out to their tenancy manager or support worker. It is critical that trusting and connected relationships, that are culturally sensitive, and which are culturally appropriate are enabled across all parts of the service system. Without these there is a risk that more of our people will be at risk or end up homeless, adding to the already shocking numbers. Indeed, many non-Indigenous organisations operate on a "fly-in fly-out" basis, failing to work with our communities to build local capability and lasting relationships. This is an opportunity to change the paradigm and learn from the evidence and the failures of the past.

In contrast, Aboriginal and Torres Strait Islander community-controlled organisations work with our peoples, engaging elders and communities at all stages of the decision-making process and hiring locals to build expertise and competence within communities so that they do not have to remain dependent on governments. Ensuring that our organisations are properly resourced and supported must form a vital part of any refreshed Closing the Gap Strategy.

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[9] Ibid.

[i] Bridge, C, Flatau, P, Whelan, S, Wood, G & Yates, J 2003, 'Housing assistance and nonshelter outcomes', final report, Australian Housing and Urban Research Institute.

[ii] Bessant, J, Coupland, H, Dalton, T, Maher, L, Rowe, J, Watts, R 2003, 'Heroin users, housing and social participation: attacking social exclusion through better housing', final report, Australian Housing and Urban Research Institute Bradbury and Chalmers

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[iv] Brackertz, N, Davison, J, and Wilkinson, A 2017, "How can Aboriginal housing in NSW and the Aboriginal Housing Office provide the best opportunity for Aboriginal people?" Final Report. AHURI Sydney Research Centre, for Aboriginal Housing Office. 2017
[v] VCOSS Submission to Closing the Gap Refresh, 2018

[vii] Department of Families, Housing, Community Services and Indigenous Affairs. Indigenous Home Ownership Issues Paper. 2013
[viii] Productivity Commission. Overcoming Indigenous Disadvantage, 2016. Page 9.25
[ix] i Maclennan, Crommelin L, van den Nouwelant, R Randolph, B: Improving the Economic Arguments for more diverse and affordable housing models for Sydney, UNSW, 2018
[x] i The Scottish Economy: A Living Book, edited by Kenneth Gibb, Duncan Maclennan, Des McNulty, Michael Comerford, Taylor and Francis, 2017

[xii] Mallett, S, Bentley, R, Baker, E, Mason, K, Keys, D, Kolar, V and Krnjacki, L. (2011) Precarious housing and health inequalities: what are the links? Summary report. Hanover Welfare Services, University of Melbourne, University of Adelaide, Melbourne CityMission, AHURI and VicHealth, Australia. Available at:
https://www.vichealth.vic.gov.au/~/media/resourcecentre/publicationsandresources/health%20inequalities/precarious%2 0housing/precarious%20housing_summary%20report_web.pdf?la=en
[xiii] Productivity Commission. Report on Government Services, 2017. Table 18A.8
[xiv] Milligan, V., Pawson, H., Phillips, R. and Martin, C. Developing the scale and capacity of Australia's affordable housing industry. AHURI Final report No. 279. 2017
[xv] Productivity Commission. Report on government Services 2018.

[xviii] Department of Prime Minister and Cabinet. Closing the Gap Report 2018. Canberra
[xix] Biddle, N. and Markham F. Census 2016: What's changed for Indigenous Australians? The Conversation 28 June 2017.
[xx] Australian Bureau of Statistics. 2071.0 Reflecting Australia: Stories From The Census, 2016 - Aboriginal and Torres Strait Islander Population. Table 7
[xxi] Productivity Commission. Report on Government Services, 2018.
[xxii] Productivity Commission. Overcoming Indigenous Disadvantage, 2016. home ownership/purchase was higher in major cities (34.7%), inner regional (36.4%) and outer regional (31.4%) areas, than in remote (19.1%) or very remote (7.7%) areas.
[xxiii] Stone, W et al., Home ownership remains strong in Australia but it masks other problems: Census 2016. The Conversation 27 June 2017. The Productivity Commission's report Overcoming Indigenous Disadvantage 2016 states 27.4% of Indigenous Australians (not households) owned or were buying their home in 2002.

- *Public housing*: dwellings owned (or leased) and managed by State and Territory housing authorities. It is generally accessed by people on low incomes and/or those with special needs, and aims to provide a choice of housing location, physical type and management arrangements.

State owned and managed Indigenous housing (SOMIH): dwellings owned and managed by State and Territory housing authorities that are allocated only to Aboriginal and Torres Strait Islander tenants, including dwellings managed by government Indigenous housing agencies.

Community housing: rental housing provided to low–to–moderate income and/or special needs households, managed by community-based organisations that lease properties from government or have received a capital or recurrent subsidy from government. Community housing organisations typically receive some form of government assistance, such as direct funding or the provision of land and property, but a number of community housing organisations are entirely self-funded.

Indigenous community housing (ICH): dwellings owned or leased and managed by ICH organisations and community councils. ICH models vary across jurisdictions and can also include dwellings funded, managed or registered by government. ICH organisations include community organisations such as resource agencies and land councils.

Crisis and transitional housing is another form of social housing, but is not able to be separately identified in this Report. Some crisis and transitional housing may be indirectly reported through the forms of social housing that are reported.

Sourced from: Report on Government Services 2018