

Submission – National Housing and Homelessness Plan Bill 2024



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About Queenslanders with Disability Network (QDN)

Queenslanders with Disability Network (QDN) is an organisation of, for, and with people with disability. QDN operates a state-wide network of 2,000+ members and supporters who provide information, feedback and views based on their lived experience, which inform the organisation's systemic advocacy activities. QDN's work is focused on the rights and full social and economic inclusion of people with disability, along with areas of key importance identified by Queenslanders with disability – the NDIS and mainstream services that people with disability rely on every day, including health, housing, employment and transport.

QDN members have actively engaged to provide feedback, input and their lived experience at the Commonwealth level including the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (DRC), the National Disability Insurance Scheme (NDIS) Review and improving housing and support options for vulnerable people with disability. QDN commends systemic reform to housing and homelessness. While Queenslanders with disability acknowledge the efforts of governments at all levels, there is a need to enshrine housing as a human right in legislation to improve development of housing policy towards better outcomes for people with disability as end users. Fundamental is the authentic consultation and meaningful engagement of people with disability, their families, providers and the broader sector. We believe people with disability should always be at the table when decisions are made that directly impact their lives.

QDN believes people with disability have the same right as other citizens to have housing options and choices available to them that are inclusive, accessible, safe and affordable. To make this vision a reality QDN has developed four key principles to guide the provision of housing across the public and private sectors. QDN's four Housing Principles are based on international human rights conventions and treaties to which Australia is a signatory, Australia's Disability Strategy and the core NDIS principles of choice, control and economic and social participation. They cover:

- **Rights:** People with disability and older people have the same rights to housing and assistance as the rest of the community and are encouraged and supported to exercise those rights.
- **Choice:** People with disability and older people have choice about where they live, who they live with, and who comes into their home and when, rather than this being determined by the provider.
- **Inclusion:** Appropriate housing provides pathways to independence and enables social and economic participation through alternatives to group homes and high density of people with disability.
- **Control:** Where a person requires support in their home, the provision and management of their housing should be separate from the provision and management of their paid supports. This will ensure greater housing security.

This submission is informed by work undertaken by QDN over many years in relation to safe, affordable and accessible housing. All of this work has been co-designed with our members with lived experience of disability and reflects their diversity of experience and needs. This includes earlier research and submissions '[A Place to call Home](#)', '[Going for Gold: Accessible, Affordable Housing Now](#)' that informed the current Housing Principles for Inclusive Communities, and the recent Co-Design for Inclusive Housing

work and report for the Queensland Department of Housing to inform the statewide action plan *Partnering for inclusive housing with people with disability in Queensland 2024–2027*.

Australian context

Currently in Australia there is an urgent shortage of affordable, accessible and sustainable housing across both the private and social housing sectors¹, exacerbated by a significant decrease in social housing stock across Australia over the last decade². However, people with disability have a greater likelihood of not being able to afford or access private sector (rental or ownership) options, in fact they are four times more likely to rent from a State or Territory housing authority than people without disability³. Anglicare Australia (2022) has been tracking rental affordability across Australia since 2010, and in 2022 reported that only 0.1% of rental properties were affordable for a single person on the Disability Support Pension, a decrease from 0.8% in 2012⁴. The crisis in housing is pushing people into homelessness, and people with disability make up 9.5% of all clients supported by Specialist Homelessness Services with 47% of these having a severe or profound disability⁵.

There is a need to prioritise and support innovation and co-design of housing models to align with disability systems globally that are moving away from congregated living towards individualised models of housing. These models are scattered across typical neighbourhoods and communities and are reflective of the proportion of people with disability creating greater inclusion.

Home and Living under the NDIS

For NDIS participants, the choice of where to live and who to live with is often not the individual choice of people with disability but more often that of family members, guardians, NDIS nominees, NDIS planners, service providers, and policy makers.

In line with QDN's housing principles, QDN has a strong position that there needs to be a clear separation of housing and the provision of supports for people with disability. Housing should be primarily a person's home, not someone's workplace, and people should be able to change their housing without affecting their support arrangements and change their service provider without affecting their housing.

While the NDIS provides a range of tailored home and living supports designed to assist people with disability to be included in communities, in the current housing crisis facing Australia, people with

¹ Clarke, A., Cheshire, L., Parsell, C., & Morris, A. (2022). Reified scarcity & the problem space of 'need': unpacking Australian social housing policy. *Housing Studies*, 1-19.

² AHURI (2021, August 04). Census reveals fewer social housing households across Australia. Retrieved from <https://www.ahuri.edu.au/research/brief/2021-census-reveals-fewer-social-housing-households-across-Australia#:~:text=The%20release%20of%20the%202021,increase%20over%20that%20time%20period.>, Accessed 30 July 2024.

³ Australian Institute of Health and Welfare, 'People with disability in Australia', Australian Government, [People with disability in Australia, Living arrangements - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/reports-and-issues/people-with-disability-in-australia), Accessed 30 July 2024.

⁴ Anglicare Australia (2022), Homes for all: A Roadmap to Affordable Housing. Anglicare Australia: Canberra, [Homes-for-All.pdf \(anglicare.asn.au\)](https://www.anglicare.asn.au/homes-for-all), Accessed 30 July 2024.

⁵ Australian Institute of Health and Welfare, 'People with disability in Australia', Australian Government, [People with disability in Australia, Living arrangements - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/reports-and-issues/people-with-disability-in-australia), Accessed 30 July 2024.

disability are even more disadvantaged. Beyond reform and improvements made to the scheme itself, there needs to be better understanding and integration with state government and mainstream service systems to ensure people with disability are not at increased risk of homelessness, moved into inappropriate housing such as aged care facilities, health/hospital systems, or at risk of increased contact with the Child Safety and justice systems.

Many Specialist Disability Accommodation (SDA) homes are sitting vacant because of the wait times on approval of SDA for NDIS participants, and that SDA stock is not being built in areas where participants want to live, or where there is sufficient infrastructure, both formal and informal. Many NDIS participants are not eligible for either SDA or Individualised Living Options (ILOs), cannot access mainstream housing options, and have been approved for Supported Independent Living (SIL) accommodation. Mostly SILs accommodation is a communal living arrangement (a contemporary group home), which does not suit all people and/or all disabilities. The Disability Royal Commission has been provided substantial evidence in relation to providers not always operating ethically, and the increased risk of exploitation and abuse experienced by our most vulnerable people.⁶

There is a general lack of knowledge around housing supports in the housing sector which needs addressing. The focus of home and living supports should centre around participants' needs and providing appropriate forms of housing based on such needs, with a focus on vulnerable groups including those who are in legacy group homes.

Navigating the housing and support system is complex. There are often barriers to navigate, including the inability to afford modified housing, assumptions about the need for institutional and congregate care, and difficulty negotiating and advocating within the housing system, particularly for those with complex needs, including people with intellectual and cognitive disabilities.

Person-centred housing outcomes are best achieved when conversations around housing options happen early and well in advance of transitions from one living situation to another. The housing market needs to be reshaped to consider the needs of people with disability to have a voice and be empowered in understanding and considering their housing options.

Australia's Disability Strategy

Australia's Disability Strategy (ADS) recognises the need to address the housing disparity faced by people with disability through outcomes and policy priorities to increase the availability of affordable and accessible housing and to ensure the built and natural environment is accessible through universal design. The ADS is lacking a targeted action plan that focuses on housing.

Passing of this Bill for an Act to require the preparation of a National Housing and Homelessness Plan would ensure more opportunities for intersection with the ADS when developing the Plan. This would result in improved housing outcomes for people with disability.

National Agreement on Social Housing and Homelessness

There is a lack of priority for people with disability in National Agreements. To achieve housing as a human right, the National Agreement on Social Housing and Homelessness should address the

⁶ Disability Royal Commission (2020). Report of Public hearing 3: The experience of living in a group home for people with disability. [Report - Public hearing 3 - Group homes \(royalcommission.gov.au\)](https://www.royalcommission.gov.au/reports-publications/3-the-experience-of-living-in-a-group-home-for-people-with-disability)

disproportionate housing inequality that affects people with disability by putting in place across all jurisdictions:

- outcomes frameworks focused on people with disability
- consultation and co-design with people with disability
- public reporting on priority policy areas for people with disability
- alignment with the housing outcomes in Australia’s Disability Strategy
- monitoring and evaluation of improved outcomes for people with disability.

Queensland context

QDN acknowledges the significant commitment to address the housing crisis made by the Queensland Government through *Homes for Queenslanders* and actions specifically related to people with disability contributing to Queensland’s implementation of *Australia’s Disability Strategy 2021–2031* and the State Disability Plan *Partnering for inclusive housing with people with disability in Queensland 2024–2027*.

The Brisbane 2032 Olympics and Paralympic Games provide a ‘once in a lifetime’ opportunity for Queensland and our nation more broadly to be recognised on the world stage as the most inclusive and accessible city, with housing an essential element of that both in the lead up, during, and post the Games. QDN members contributed to a broader vision for the games with housing a key focus including aspirational targets for inclusionary zoning and accessibility standards, athlete accommodation transitioned into community housing as a legacy and protections and safeguards in relation to renting⁷.

Recommendation

QDN is pleased to see a rights-based approach in the Bill and the inclusion of a person with lived experience of disability to be appointed to the National Housing Consumer Council.

QDN acknowledges inclusion of the United Nations Convention on the Rights of People with Disability (UNCRPD) and Disability Royal Commission in Clause 8 Content of National Housing and Homelessness Plan. QDN recommends the UNCRPD also be added to Clause 3 Objects of the Act to further progress the realisation of housing as a human right for people with disability in compliance with the UNCRPD requirement of adequate standard of living for people with disability and their families, including the right to adequate and accessible housing and to the continuous improvement of living conditions.

The introduction of this Bill would see improved human rights-based practices leading to broader systemic changes. Aligning legislation nationally with human rights advancements is crucial for ensuring consistent and robust protections.

QDN recommends the Bill be passed to protect the human rights of people with disability by:

- Enshrining housing as a human right
- Providing accountability for housing ministers to report on progress to both parliament and to people with disability
- Establishing a longer view to housing beyond the election term
- Providing greater opportunity for the National Housing and Homelessness Plan to intersect with other strategies

⁷ Brisbane 2032 Olympic and Paralympic Games Visioning Forum [Visioning Forum - For people with disability - Online Event - Queenslanders With Disability Network \(qdn.org.au\)](https://www.qdn.org.au/visioning-forum-for-people-with-disability-online-event-queenslanders-with-disability-network).

- Legislating the requirement to consult with people with disability in developing the Plan
- Mechanisms to report independently on systemic housing issues.

Conclusion

QDN appreciates the opportunity to contribute to the National Housing and Homelessness Plan Bill 2024. We commend the proactive steps taken to enhance protections and promote inclusivity for people with disability in the Bill. We look forward to ongoing engagement to ensure that the rights of people with disability are fully protected and advanced.