



people with disability

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NGO in Special Consultative Status with the  
Economic and Social Council of the United Nations

Council on Federal Financial Relations  
Social Policy division  
The Treasury  
Langton Crescent  
PARKES ACT 2600  
By Email: [affordablehousing@treasury.gov.au](mailto:affordablehousing@treasury.gov.au)

10 March 2016

Dear Division Head

**Re: Affordable Housing Working Group Issues Paper**

1. People with Disability Australia ([PWDA](#)) is a leading disability rights, advocacy and representative organisation of and for all people with disability. We are a national, cross-disability peak representative organisation and member of the [Australian Cross-Disability Alliance](#). We are a non-profit, non-government organisation representing the interests of people with all kinds of disability. PWDA's primary membership is made up of people with disability and organisations primarily constituted by people with disability.
2. The lack of affordable, accessible housing is a significant problem for people with disability, and also has a considerable impact on their overall economic security and social participation. PWDA welcomes the initiative by the Commonwealth to address housing supply across the public, community and private housing sectors and to seek feedback on possible financing models.
3. PWDA is not a position to provide technical advice and expertise on the merits of specific financing models at this time. However, we are in principle supportive of the four identified financing models: Housing Bonds, Housing Trusts, Housing Corporations, and Social Impact Bonds and consider that a mix of these initiatives may be most appropriate to meet the supply required. We also recommend to you a City Futures Research Centre report produced for Housing NSW in 2011, 'Social Housing Strategies, Financing Mechanisms and Outcomes,'<sup>1</sup> which canvassed options in international jurisdictions including, rent-to-own schemes, social

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<sup>1</sup> Hal Pawson, Julie Lawson and Vivienne Milligan, "Social Housing Strategies: Financing Mechanisms And Outcomes: An International Review And Update Of Key Post-2007 Policy Developments", City Futures Research Centre, University of New South Wales, 2011.

housing purchase schemes, community land trusts, land rental schemes, shared equity and co-operative housing models with home ownership built in, and squatters' rights.

4. Our interest in this consultative process is to highlight the need for initiatives or programmes intended to increase the supply of affordable housing to be inclusive of people with disability and to meet their needs. This includes consideration of their requirements from the initial design and development phases, through to implementation and monitoring. Our advocacy in this regard includes support of and participation in the Australian Network on Universal Housing Design (ANHUD), the Australian Housing and Urban Research Institute (AHURI) with whom we recently published, "[Moving to my home: housing aspirations, transitions and outcomes of people with disability](#)", and the Disability Housing Futures Working Group. PWDA is also represented on the Expert Advisory Panel to the NSW Social and Affordable Housing Fund ([SAHF](#)). Other significant contributions on affordable housing include [Accommodating Human Rights - A Human Rights Perspective on Housing and Support for Persons with Disability](#) (2010), and submissions to the [Senate Economic References Committee Inquiry into Affordable Housing](#), and [NSW Legislative Council Select Committee Inquiry into Social, Public and Affordable Housing](#) (2014).
5. Taking into account the brief comments we make below would ensure that any future affordable housing initiatives facilitate achievement of [National Disability Strategy 2010-2020](#) targets, particularly Policy Direction 3 (Economic Security), "Improve access to housing options that are affordable and provide security of tenure", and Policy Direction 3 (Inclusive and Accessible Communities), "Improved provision of accessible and well-designed housing with choice for people with disability about where they live".
6. Similarly, the Working Group must consider the right of people with disability to live in the community on an equal basis with others as provided by [Article 19](#) of the UN Convention on the Rights of Persons with Disabilities. When people with disability do not have adequate affordable and accessible housing choices they are at increased risk of institutionalisation in group homes, hospitals, aged care facilities and boarding houses or experience homelessness. It is imperative that both designers of future financing models and housing providers are aware and responsive to their obligations to provide accessible housing to people with disability, many of whom are either low income earners or long-term recipients of the Disability Support Pension.

## **Housing and People with Disability**

7. The ABS reports that there are approximately 4 million people with disability in Australia, 1.4 million of whom have profound and severe activity limitation.<sup>2</sup> A 2009 AHURI report summarised the living arrangements of people with disability in Australia by stating that they are overrepresented in housing assistance programmes, social housing, the homeless population, and that a large proportion of people with disability over the age of 25 either live with their parents, in shared supported accommodation facilities, or in large congregate or institutional settings.<sup>3</sup>
8. Barriers to mainstream education, training and employment; inaccessible transport systems, public spaces and workplaces; a lack of disability support; discriminatory attitudes and the high cost of having disability all contribute to the economic insecurity of people with disability. A recent OECD report stated that 45% of people with disability in Australia live on or near the poverty line. This is more than 2.5 times the rate of poverty experienced in the general population and more than double the OECD average of 22%<sup>4</sup>. Of the 4 million people with disability, 30% are represented in the lowest quintile of income bracket, and 48% rely on government allowances such as the Disability Support Pension (DSP) as their main source of income.<sup>5</sup> Given this context

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<sup>2</sup> <http://www.abs.gov.au/ausstats/abs@.nsf/mf/4433.0.55.006?OpenDocument>

<sup>3</sup> A. Beer, A. and D. Faulkner, 21st century housing careers and Australia's housing future. Melbourne: Australian Housing and Urban Research Institute, AHURI Final Report No. 128. 2009.

<sup>4</sup> <http://www.oecd.org/els/emp/42699911.pdf>

<sup>5</sup> NSW housing issues and public-policy responses: Background paper. SHELTER NSW. January 2016.

is easy to understand why people with disability are disproportionately experience significant housing stress<sup>6</sup>.

9. The declining social housing sector in Australia is having many implications for people with disability. The contraction of investment in social housing has led to it servicing only the most vulnerable and marginalised<sup>7</sup> as opposed to people on low income in general, despite waiting lists at critical levels in many of the States and Territories. Thus, the private rental market is becoming the default tenure for people with disability on low incomes<sup>8</sup> (including those with long term and complex needs) despite the myriad of barriers such as affordability, accessibility, insecurity of tenure, and discriminatory attitudes of letting agents and landlords.

## Recommendations

10. In order to address the barriers people with disability face in securing affordable and accessible housing we make the following Recommendations:
- Financing models must address **affordability of housing for people with disability** and families on very low incomes over the long-term.
  - Investment in affordable private sector housing should not come at the expense of **investment in social housing**. Social housing still has a critical role to play for many people with disability and their families who are likely to remain unable to afford to pay market rent or to purchase their own home.
  - Any new housing models must be able to provide **security of tenure** for people with disability. A permanent (or long term temporary) fixed address is an essential element in creating stability, planning disability support, and supporting people with disability to live in the community through building long-term social relationships and participating economically.
  - All new social and affordable housing built under the new financing models should incorporate **universal design** to at least the [Livable Housing Australia](#) Gold Standard. Any remodelled existing housing stock should meet the Silver Standard. This would not only create accessibility for people with disability but also extend the life and usability of the properties by supporting families, people with short-term health conditions, and aging in place of the elderly. The additional cost of building Gold Standard homes is a fraction of the cost of retrofitting at a later stage (estimated at 22 times the cost<sup>9</sup>). It is essential that meeting these standards is compulsory for any community housing provider or private developer receiving government funding.
  - Investment in affordable housing must consider **location to services** such as accessible transport, medical services, recreation, and grocery shopping in order for them to be suitable for people with disability.
  - New affordable housing models must promote **mixed use development** to ensure the inclusion of people with disability. Also to avoid congregation of people with disability on low-incomes either exclusively in social housing, or in institutional settings, disability specific settings, or in affordable housing initiatives that have the effect of segregating people with disability because they are close to particular services or because they are very low cost.
  - Successful delivery of affordable housing must include investment in **disability awareness** programmes for housing providers across the social, community and private housing sectors. This is required in order to address discrimination against people with disability as potential

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<sup>6</sup> PriceWaterhouseCoopers, "Disability Expectations: Investing in a Better Life, a Stronger Australia", 2011, p. 3.

<sup>7</sup> L. Groenhart, "Thirty years of public housing supply and consumption: 1981–2011", Melbourne: Australian Housing and Urban Research Institute, AHURI Final Report No. 231.

<sup>8</sup> S. Tually, M. Slater, S. Oakley, D Faulkner with S. Horned, "The role of private rental support in housing outcomes for vulnerable Australians", AHURI Positioning Paper, February 2015.

<sup>9</sup> [http://www.livablehousingaustralia.org.au/library/SLLHA\\_GuidelinesJuly2015-3.pdf](http://www.livablehousingaustralia.org.au/library/SLLHA_GuidelinesJuly2015-3.pdf)

tenants, increase the provision of accessible information<sup>10</sup>, and achieve disability inclusion in our communities.

- Relying on the private market to deliver affordable housing for people with disability requires the development and implementation of adequate **tenancy support mechanisms** as well as an increase in supply. A recent AHURI report identified 6 key areas in which this will be required<sup>11</sup>:
  1. Increased knowledge and education about the rental sector;
  2. More readily available and flexible bond assistance;
  3. Payment support for those experiencing cash flow problems in order to avoid failed tenancies;
  4. Brokerage to assist in addressing disability discriminatory and prejudicial attitudes;
  5. Greater regulation to address poor quality standards; and
  6. Greater regulation and review of the informal, non-leased sector to avoid predatory landlordism and exploitation.
- New financing models and affordable housing programmes must include **regulatory mechanisms** to ensure that housing stock is affordable and accessible to people with disability throughout their lives.

In summary, in order to achieve growth in affordable housing which adequately services the people who need it most, people with disability and their representative organisations must be included at every stage of the process. Disability inclusion is relevant to every stage including for example, economic modelling, procurement of land, and projections of cost. The social impact of future affordable housing schemes – how they are built, where, who by and who for – must be considered within the design from the outset.

Thank you for the opportunity to input into this process. PWDA would welcome further consultation on any of the matters raised.

Yours faithfully



Therese Sands

CO-CEO

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<sup>10</sup> P. French, “Accommodating Human Rights: A human rights perspective on housing and housing and support, for persons with disability”, People with Disability Australia, 2009.

<sup>11</sup> W.Stone, A. Sharam, I. Wiesel, L. Ralston, S. Markkanen and A. James, “Accessing and sustaining private rental tenancies: Critical Life events, housing shocks and insurances”. AHURI Final Report No. 259. p.4.