

National Housing and Homelessness Plan

Submission

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About ACCPA

The Aged and Community Care Providers Association (ACCPA) is the national Industry Association for aged care providers offering retirement living, seniors housing, residential care, home care, community care and related services.

ACCPA exists to unite aged care providers under a shared vision to enhance the wellbeing of older Australians through a high performing, trusted and sustainable aged care sector. We support our members to provide high quality care and services while amplifying their views and opinions through an authoritative and comprehensive voice to the government, community, and media.

Our sector serves to make better lives for older Australians, and so do we.

1. Introduction

ACCPA appreciates the opportunity to provide input to inform the development of the National Housing and Homelessness Plan. This submission has been prepared from an aged care perspective to highlight the needs of older people who are experiencing homelessness or at risk of being homeless.

According to the Australian Bureau of Statistics (ABS), in 2021 19,378 people aged 55 years and over were experiencing homelessness, representing one in seven (15.8%) people experiencing homelessness at the time of the Census.¹

Older females had a homelessness rate of 19 people per 10,000 in 2021, and were more likely than males to be:

- in supported accommodation for the homeless (16.9%, compared with 10.2% of males)
- staying temporarily with other households (26.7%, compared with 19.6% of males)
- living in 'severely' crowded dwellings (30.5%, compared with 17.7% of males).

Older males had a homelessness rate of 34 people per 10,000 in 2021, and were more likely than females to be:

- living in improvised dwellings, tents, or sleeping out (12.4%, compared with 8.3% of females)
- living in boarding houses (37.1%, compared with 14.6% of females).

With an ageing population and growing levels of housing stress and homelessness across Australia, there is an urgent need to better understand the challenges faced by older people that may place them at risk of homelessness.

It is also important to understand what more can be done to prevent and address homelessness and ensure older people are housed in a way that accords them the dignity and respect they deserve, and this will need to be coordinated across different levels of government.

However, ACCPA notes that Australia does not currently have a national housing plan. Instead, there is only the National Housing and Homelessness Agreement (NHHA), which articulates the flow of funds from Commonwealth to states/territories for housing and homelessness programs.^{2,3}

The current NHHA does not impose a wider housing strategy on the Commonwealth Government. Rather, it simply notes some of the Commonwealth's responsibilities such as social welfare payments and Commonwealth Rent Assistance.

¹ [Estimating Homelessness: Census, 2021 | Australian Bureau of Statistics \(abs.gov.au\)](#)

² [The National Housing and Homelessness Agreement | Federal Financial Relations](#)

³ AHURI (2022) [The need for a robust Australian National Housing and Homelessness Plan | AHURI](#)

In this context, ACCPA welcomes the Government's commitment to developing a National Housing and Homelessness Plan (the National Plan) which will set out a shared vision to inform future housing and homelessness policy in Australia.

The development of the National Plan will require close collaboration between the Commonwealth and state and territory governments to set out a shared national vision across the responsibilities of different levels of government to improve housing outcomes and help address homelessness in Australia. It will also be critical that the National Plan is properly funded.

2. Summary of recommendations

- R1.** Expand the Assistance with Care and Housing program across Australia and adequately fund the program on an ongoing basis.
- R2.** Increase funding under the AN-ACC to better support aged care providers in providing care to people who were homeless or at severe risk of becoming homeless at the time they entered permanent residential care.
- R3.** Increase funding to support Specialist Homelessness Services to secure long term housing for older people who are homeless or at risk of homelessness.
- R4.** Increase funding targeted at social housing for older Australians who are homeless or at risk of homelessness.
- R5.** Expand and fund innovative models, such the Wintringham and RALAC models in Victoria, that provide support services for elderly men and women who are disadvantaged, homeless or at risk of homelessness.
- R6.** Provide seniors housing options that meet the needs of older people with different financial, social, physical, and cognitive capabilities.
- R7.** That the National Plan includes specific initiatives to support specialist residential aged care for older people experiencing homelessness with high care needs, including using the small household model as noted by the Aged Care Royal Commission.
- R8.** Provide financial incentives and/or capital grants for aged care providers to flexibly develop accommodation to support older Australians with high care needs, including implement small household models.
- R9.** Explicitly reference older Australians who are experiencing homelessness or at risk of being homeless as priority groups under the proposed National Housing and Homelessness Plan.
- R10.** Develop specific initiatives to support older Australians who are experiencing homelessness or at risk of being homeless to secure appropriate housing/accommodation, including access to aged care.
- R11.** Develop an evaluation framework for the proposed National Plan in collaboration with relevant stakeholders, including the aged care sector, to measure performance, track progress and ensure the plan is meeting its objectives.

3. Older people, housing, and homelessness

In 2006, about 12,500 people experiencing homelessness were aged 55 or older, increasing to about 14,600 in 2011, about 18,700 in 2016, and 19,378 in 2021. This highlights the growing homelessness problem over time among Australia's ageing population.^{4,5}

Older people face some of the same risks of homelessness as the rest of the population, including lack of appropriate and affordable housing and lack of financial stability. However, these broad structural factors can impact on older people in different ways due to changing housing needs and financial circumstances in the later stages of their lives. Other precursors to homelessness are experienced more frequently in older age, such as disability and mental illness.⁶

The challenges faced by older people also vary depending on a range of intersecting issues including gender, socio-economic status, cultural background, sexuality, remoteness and caring responsibilities, and therefore solutions must be tailored to the needs of each individual.

Self-funded accommodation is not an option for many older Australians. Many depend on social security or social housing to cover accommodation and living expenses. The combination of low incomes and rising living costs is a significant factor in older people's homelessness. The supply of private rental housing or social housing for people on very low incomes is limited.

The Royal Commission into Aged Care Quality and Safety⁷ noted there are several system and procedural barriers to appropriate care and support for older people who have experienced, or been at risk of, homelessness. These barriers included that current aged care funding is insufficient to meet the needs of people who have experienced, or been at risk of, homelessness and there are many service gaps in specialist homelessness aged care services.

Furthermore, when an older person enters a Commonwealth subsidised residential care facility, there are a number of fees and charges that they may have to pay. These include a basic daily care fee (also known as the standard resident contribution), a Refundable Accommodation Deposit (RAD) or Daily Accommodation Payment (DAP), and a potential Means Tested Income Fee. A common means of raising the capital to pay the RAD is by selling the family home.

This option is not available to people in living in private rental properties, social housing or who are experiencing homelessness.

However, fully supported residents (older people who are eligible to receive any Government contribution towards their accommodation) do not pay RAD, DAP or a Means Tested Income

⁴ AIHW (2022) [Specialist homelessness services annual report 2021–22, Older clients - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/reports/homelessness/specialist-homelessness-services-annual-report-2021-22/older-clients)

⁵ ABS (2021) [Estimating Homelessness: Census, 2021 | Australian Bureau of Statistics \(abs.gov.au\)](https://www.abs.gov.au/ausstats/abs@/articles/estimating-homelessness-census-2021)

⁶ [Mission Australia Ageing and Homelessness report November 2017 - WCAG \(2\).pdf](https://www.missionaustralia.org.au/wp-content/uploads/2017/11/Mission-Australia-Ageing-and-Homelessness-report-November-2017-WCAG-2.pdf)

⁷ Aged Care Royal Commission (2019) [Actions to support older and prematurely aged people who have experienced, or been at risk of, homelessness CTH.0001.1001.2031.pdf \(royalcommission.gov.au\)](https://www.royalcommission.gov.au/reports/aged-care-royal-commission-2019-actions-to-support-older-and-prematurely-aged-people-who-have-experienced-or-been-at-risk-of-homelessness)

Fee, but are still required to pay basic daily care fee which is set by the Government at 85% of the single basic Aged Pension.

4. Supporting older people experiencing or at risk of homelessness

There is an urgent need to address homelessness or housing stress among older people, as well as to prevent future issues for the rapidly growing population of older people.

In this context, ACCPA supports Mission Australia's statement that "appropriate and affordable housing is a key part of the solution for all older people experiencing, and at risk of homelessness. A range of housing options is required to cater for a broad spectrum of circumstances including supports to age in place, an increased supply of social and affordable housing for older people, supported accommodation models for older people with more complex needs and specific residential aged care facilities that can provide intensive supports to the formerly homeless".⁸

There are specialist homelessness aged care services to support older and prematurely aged people who have experienced, or been at risk of, homelessness. These include Assistance with Care and Housing (ACH) services under the Commonwealth Home Support Programme (CHSP) and additional funding under the AN-ACC funding model for aged care services that specialise in caring for homeless care recipients.

Additionally, older people experiencing homelessness and those at risk of homelessness, can access the Specialist Homelessness Services (SHS), or social housing where appropriate/available.

4.4 Assistance with care and housing

Assistance with Care and Housing (ACH) for the Aged Program is the only program targeted specifically for the older homeless and insecurely housed. In addition to assisting with housing for low income, frail older people, agencies link their clients to services such as Home and Community Care, Aged Care Assessment Team (to facilitate Community Aged Care Packages), health and welfare services.

ACCPA believes that the ACH program is an effective program which should be expanded across Australia and adequately funded on an ongoing basis.

R1. Expand the Assistance with Care and Housing program across Australia and adequately fund the program on an ongoing basis.

4.5 Aged care homeless specialist support services

From 1 October 2022, aged care funding under the Aged Care Funding Instrument (ACFI) was rolled into AN-ACC. This means providers are funded for and required to provide

⁸ [Mission Australia Ageing and Homelessness report November 2017 - WCAG \(2\).pdf](#)

services to residents in accordance with their obligations under the *Aged Care Act 1997* (Cth) and the associated Quality Standards.

The funding for homeless supplement to better support aged care providers in providing care to people who were homeless or at severe risk of becoming homeless at the time they entered permanent residential care has been rolled into AN-ACC. This will provide additional funding for aged care services that specialise in caring for homeless care recipients.

Under ACFI, residents located in specialised homeless facilities would receive an average per bed per day subsidy of approximately \$227, compared with approximately \$303 per bed per day under AN-ACC.⁹ As more than 50% of aged care providers are operating at a loss, ACCPA recommends that funding should be increased to provide greater support to services that specialise in caring for homeless care recipients.

R2. Increase funding under the AN-ACC to better support aged care providers in providing care to people who were homeless or at severe risk of becoming homeless at the time they entered permanent residential care.

4.6 Specialist Homeless Services

People experiencing homelessness and those at risk of homelessness are among Australia's most socially and economically disadvantaged. Governments across Australia fund services to support such people, known as Specialist Homelessness Services (SHS). These services are delivered mainly by non-government organisations, including those specialising in delivering services to specific target groups (such as young people or people experiencing family and domestic violence) and those providing more generic services to people facing housing crises.¹⁰

However according to AIHW, older clients are less likely to request accommodation services (46%) than the general SHS population (56%).¹¹ Of those who did request accommodation, most needed long-term housing (36%) and they were twice as likely as the general SHS population to be provided with this form of accommodation (10% compared with 5% of the general SHS population).

In 2017–18, most older SHS clients who presented to agencies were housed but at risk of homelessness (67%), with the remaining 33% presenting as homeless. By contrast, around 57% of all SHS clients were at risk of homelessness at presentation to agencies and 43% were experiencing homelessness.¹²

R3. Increase funding to support Specialist Homelessness Services to secure long term housing for older people who are homeless or at risk of homelessness.

⁹ Mirus Australia (2022) [Which aged care funding supplements are changing with AN-ACC? - Mirus \(mirusaustralia.com\)](https://www.mirusaustralia.com/which-aged-care-funding-supplements-are-changing-with-an-acc/)

¹⁰ AIHW (2019) [Older clients of specialist homelessness services , Homelessness - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-2016-17/contents/client-groups-of-interest/older-clients)

¹¹ AIHW (2018) Specialist homelessness services annual report 2016–17 <https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-2016-17/contents/client-groups-of-interest/older-clients>

¹² AIHW (2019) [Older clients of specialist homelessness services , Homelessness - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-2016-17/contents/client-groups-of-interest/older-clients)

4.7 Social Housing

Older people having difficulty meeting the costs of housing can be supported by housing assistance programs, such as financial assistance and social housing (e.g. public and community housing). Whether it is managed by state and territory governments or community-based organisations, social housing can play a critical role in reducing financial and housing stress and improving physical and mental wellbeing.

During 2019–20, older people (aged 65 and over) represented 1 in 5 public housing household members (21%, 121,900) and 1 in 5 community housing household members (19%, 34,300). Women make up the majority of all occupants, and older occupants, in public and community housing. During 2019–20, females accounted for 59% of public housing occupants and 59% of community housing occupants aged 65 and over.¹³

R4. Increase funding targeted at social housing for older Australians who are homeless or at risk of homelessness.

As noted above, aged care homes provide care and accommodation services for people facing homelessness, with some aged care homes (such as Wintringham and Ringwood Lionsbrae Aged Care Facility (RALAC) in Victoria) specialising in caring for this group. Additionally, Assistance with Care and Housing services delivered under the CHSP can link older people facing homelessness with a provider – usually a charitable or religious organisation – to find better, more stable accommodation. Once this is organised, the person can be linked to other services to receive help at home or in the community.¹⁴

Innovative model such the Wintringham and RALAC model in Victoria should be supported and expanded across Australia. Wintringham, for example, through a continuum of care model, provides a range of innovative programs delivering safe, secure and affordable housing and related support services for elderly men and women who are disadvantaged, homeless or at risk of homelessness.

Their services include outreach, independent and supported housing, in-home aged care, residential aged care and palliative care. Their programs have seen a significant reduction in behaviours of concern, including substance and alcohol abuse, and acute medical care, and the majority of residents also successfully secured long-term accommodation and created connections with community-based care.

Significant funding is needed to overcome growing rates of homelessness in our ageing population. As older Australians are not a homogeneous group, the housing options available need to meet the needs of people with different financial, social, physical and cognitive capabilities.¹⁵

Funding is also needed to put support in place not only to allow people to move from homelessness to permanent accommodation, but also to counter the factors that lead to

¹³ AIHW (2023) [Older Australians, Housing and living arrangements - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/reports/older-australians/housing-and-living-arrangements)

¹⁴ My Aged Care [Support for older people experiencing homelessness | My Aged Care](https://myagedcare.gov.au/support-for-older-people-experiencing-homelessness)

¹⁵ The Conversation (2017) More and more older Australians will be homeless unless we act now <https://theconversation.com/more-and-more-older-australians-will-be-homeless-unless-we-act-now-87685>

homelessness. These include the shortage of affordable rental accommodation, lack of accessible support networks, and financial insecurity for older people on low incomes.

- R5. Expand and fund innovative models, such the Wintringham and RALAC models in Victoria, that provide support services for elderly men and women who are disadvantaged, homeless or at risk of homelessness.**
- R6. Provide seniors housing options that meet the needs of older people with different financial, social, physical, and cognitive capabilities.**

5. Older people experiencing homelessness who have high care needs

In Melbourne Australia, the 'Wicking Project'¹⁶ evaluated a specialised model of residential aged care over two consecutive pilot studies to support residents living with a history of homelessness, cognitive impairment due to alcohol related brain injury, and high behaviour support but low physical healthcare needs.

The specialised Wicking model of care included intensive case management, one-on-one care support, structured individualised activity programs and access to multidisciplinary support services as required. A range of positive outcomes were reported, including reductions in depression, anxiety, and average alcohol consumption, along with increases in productivity as measured by the Community Integration Questionnaire.

Outcomes from this series demonstrated the feasibility of successfully transitioning a group of older people experiencing alcohol related brain injury from homelessness into specialised care, providing support for future studies to broaden outcomes to older homeless people in general.

Building on the Wicking project, HammondCare undertook a pilot program¹⁷ to assess the benefits of specialised care for older people with high care needs. The purpose of this study was to evaluate the outcomes of this new service to help inform policy and practice for older people with high care needs subject to homelessness. The study examined changes in residents' physical, mental, psychological and social health from admission up to 12 months post admission, as well as the costs, primarily to government, incurred by the study cohort in the 12 months leading up to, and in the 12 months following, their admission to the care home, including any cost benefit derived.

The residents in this study reported improved mental wellbeing and maintained physical functioning over the first 12 months of living in this new aged care home. The study also suggests a reduction in the cost to government.

In light of the success of the HammondCare's Pilot, ACCPA recommends that the National Plan includes specific initiatives to support specialist residential aged care for older people

¹⁶ Rota-Bartelink A. The Wicking Project II (2015–2016). The provision of skilled specialist consultancy services to people living with highly complex needs and their caregivers. Final report. Final Report published by Wintringham, Flemington Victoria. 2016

¹⁷ O'Connor et. al (2023) An Australian aged care home for people subject to homelessness: health, wellbeing and cost-benefits. BMC Geriatrics (2023) 23:253 <https://doi.org/10.1186/s12877-023-03920-3>

experiencing homelessness with high care needs, including using the small household model as noted by the Aged Care Royal Commission.¹⁸

In general, residential aged care homes should be designed to support the health, safety and independence of older Australians, and to optimise their quality of life.

Furthermore, applying dementia-friendly design principles can help to ensure that residential aged care homes not only meet the needs of residents with dementia, but also benefit residents experiencing a range of other age-related conditions, such as deteriorating eyesight, mobility issues and/or cognitive impairment.

In recent years there has been increasing interest in small household models of aged care, as these have been associated with a range of benefits including reduced social isolation and better orientation.

However, it is also important that the aged care system provides flexibility to allow consumers to choose the type of aged care service which best meets their care needs and personal preferences.

R7. That the National Plan includes specific initiatives to support specialist residential aged care for older people experiencing homelessness with high care needs, including using the small household model as noted by the Aged Care Royal Commission.

R8. Provide financial incentives and/or capital grants for aged care providers to flexibly develop accommodation to support older Australians with high care needs, including implement small household models.

6. Embedding a plan for older Australians in the proposed National Plan

Homelessness is an unacceptable breach of human rights and has many negative effects on people's health and wellbeing which are multiplied as people age. Research studies have shown that:

- People experiencing homelessness are more likely to prematurely age compared to the general population.
- Chronic health conditions are generally more common amongst older people experiencing homelessness.
- Older and prematurely aged people who are experiencing homelessness often also experience mental illness, which may be the result of, or compounded by, traumatic experiences while homeless.
- The risk of death for older and prematurely aged people experiencing homelessness is higher than that for older and prematurely aged people with housing.

¹⁸ Aged Care Royal Commission (2020) [Review of innovative models of aged care \(royalcommission.gov.au\)](https://www.royalcommission.gov.au/review-of-innovative-models-of-aged-care)

- Older and prematurely aged people may be experiencing homelessness as a result of abuse and have continued higher rates of abuse while homeless.¹⁹

In reviewing the issues paper, ACCPA notes that the proposed National Plan will set a national vision and provide:

- A better understanding of the current state of housing and homelessness in Australia and what is contributing to homelessness and housing insecurity.
- A clear, long-term vision for the future of housing and homelessness policy in Australia.
- Insights about specific housing and homelessness needs in urban, regional, rural and remote Australia.
- Ways to improve the collection and use of disaggregated data to design more effective policy approaches and improve monitoring and evaluation.
- Lessons from other countries and jurisdictions about policies which have led to a decline in rates of homelessness and how these could be adopted in Australia.
- Strategies for how all levels of government can work together and with the private and community sectors to better support people experiencing homelessness and housing insecurity.
- National goals and objectives for housing and homelessness, including how these will be achieved.

ACCPA notes that older Australians who are experiencing homelessness or at risk of homelessness were not explicitly identified/named as a priority group in the proposed National Plan – which needs to be rectified.

Considering that the lack of affordable housing in recent times has left many older Australians homeless or at risk of homelessness, ACCPA strongly recommends that these vulnerable groups be explicitly named as a priority group within any housing and homelessness policies, including the proposed National Plan.

Importantly, the National Plan will need to identify the key short, medium and long term reforms needed to improve outcomes across the housing spectrum and address homelessness, and be evaluated on a regular basis to track progress and ensure the objectives are met. This means an evaluation framework will need to be developed as part of the implementation of the National Plan in consultation with relevant stakeholders.

R8. Explicitly reference older Australians who are experiencing homelessness or at risk of being homeless as priority groups under the proposed National Housing and Homelessness Plan.

R9. Develop specific initiatives to support older Australians who are experiencing homelessness or at risk of being homeless to secure appropriate housing/accommodation, including access to aged care.

¹⁹ Australian Association of Gerontology (AAG). Background Paper. Older women who are experiencing, or at risk of, homelessness <http://www.aag.asn.au/documents/item/2234>

- R10. Develop an evaluation framework for the proposed National Plan in collaboration with relevant stakeholders, including the aged care sector, to measure performance, track progress and ensure the plan is meeting its objectives.**

7. Contact

If you have any further questions or would like to discuss, please contact us at policy@accpa.asn.au (attn: Mohamad Mahat, Senior Policy Advisor).