



Women's Health Tasmania

Feedback on the Tasmanian Housing Strategy Exposure Draft

JULY 2023



EQUITY
CHOICE
IMPACT

About Women's Health Tasmania

Based in nipaluna/Hobart in southern lutruwita/Tasmania, Women's Health Tasmania has been providing evidence-based services and advocacy for better health outcomes for women since 1988. We are run by women for women, with the vision of women being informed and active decision-makers in our own health and wellbeing. Our definition of 'women' is inclusive and our work supports everyone who identifies as a woman.

Introduction

Women's Health Tasmania welcomes the opportunity to provide feedback on the *Tasmanian Housing Strategy Exposure Draft* (the draft Strategy). We have sought permission from the Project Team to provide feedback outside the feedback template so we may respond to the consultation questions in non-sequential order, reflecting Women's Health Tasmania priorities and remit. We have chosen to respond to four of the eight consultation questions posed and have included recommendations to support our remarks.

QUESTION 7 – Do you have any comment on what this draft Strategy does well?

Women's Health Tasmania commends the draft Strategy for acknowledging the social and economic complexity of housing issues in Tasmania and for seeking to put "people at the centre" of the Tasmanian Government's long-term housing response.

We welcome the clear articulation of housing as a social determinant of health within the draft Strategy, and recognition of the critical links between housing and overall participation, opportunities and outcomes across the lifespan.

We are pleased to see the draft Strategy commit to Housing First, an approach that positions housing as a priority and right for everyone in the community without pre-conditions. Enshrining this principle in policy is a step toward shifting an at-times punitive housing culture which may require people to address complex health and life circumstances—for example, mental health, family violence and substance use issues—before they can access social housing.

For women, who make up the greater percentage of clients seeking assistance from Specialist Homelessness Services (SHS) in Tasmania¹ and for whom homelessness is associated with high rates of trauma and family violence—nationally 9 out of 10 female SHS clients over 18 are impacted by family violence²—this is progress towards a more responsive and person-centred housing system.

We are also glad to see a commitment to lived experience engagement within the draft Strategy and the potential for population-specific housing responses for a range of cohorts including older Tasmanians, women, children and young people. Women over 55 are the fastest growing group of people vulnerable to homelessness in Australia as a result of factors that include inequality in superannuation, job security, wages and caregiving expectations.³ Initiatives that respond to these inequities and the lifetime deficits they produce are crucial to reversing the trend.

¹ *Specialist Homelessness Services 2019-20: Tasmania*. Australian Institute of Health and Welfare, 2020.

² Ibid.

³ Patterson K, Proft K, & Maxwell J. *Older women's risk of homelessness: Background Paper: Exploring a growing problem*. Australian Human Rights Commission, 2019.

Recommendation 1. Provide further detail about the procedural and cultural changes that will support implementation of a Housing First approach in Tasmania—including new social housing eligibility processes, workforce training commitments, provision of wrap-around support services, and the mechanism for evaluating a Housing First approach.

QUESTION 8 – Is there anything you think the draft Strategy does not cover but should, or that it mentions but could be highlighted more?

Further clarification regarding the Tasmanian Government’s commitment to gender-responsive housing approaches is needed. The draft Strategy undertakes that “women and children will have housing options to match their circumstances” (p.9) and notes that:

The Tasmanian Government is partnering with Shelter Tasmania to undertake research into women’s housing. A report will be available as supporting information to the final Strategy on Homes Tasmania’s webpage. (p.16)

Separately, a supporting document called *Housing Support for Tasmanians in Need* available from the Strategy webpage acknowledges the specific ways gender inequality impacts women across the lifespan and pledges to support the housing needs of women by:

- *Incorporating findings of the Women’s Housing Research Report produced in partnership with the Tasmanian Government, Shelter Tasmania and Impact Economics into the Strategy and associated action plans.*
- *Delivering more social and affordable housing, as well as crisis and transitional accommodation for women on limited income.*
- *Applying and promoting a gender-responsive approach to housing policies and programs across Tasmania to improve housing outcomes for women.*
- *Incorporating a trauma-informed approach to policies and procedures relating to family violence and to the design of new women’s shelters. (p.2)*

Given the Shelter Tasmania report is the only commissioned population-specific housing research named, we suggest the above commitment to incorporate findings from this research into the Strategy and its action plans should be made clear in the main document.

Similarly, the promise of “applying and promoting a gender-responsive approach to housing policies and programs across Tasmania to improve housing outcomes for women” is a commitment that strengthens and extends the intent of the draft Strategy and should be named up in the main document.

A gender-responsive approach goes beyond ‘including’ women and people of diverse genders in otherwise gender-neutral strategies, requiring policy-makers to apply gender analysis systematically to produce policy responses that recognise a population’s gendered roles, responsibilities and risks.⁴

For example, a gender-responsive housing approach might ask: if safety is key to the concept of home, should women with a fixed address who are unsafe in that residence as a consequence of family violence be considered homeless for the purpose of social housing eligibility?⁵

⁴ *Gender-responsive*. UNESCO: <https://policytoolbox.iiep.unesco.org/glossary/gender-responsive/>.

⁵ *Gender-responsive housing and homelessness policy*. Australian Women Against Violence Alliance, 2017.

The decision to embed a gender-responsive policy approach also entails a gender-responsive budgetary response. The Tasmanian Government demonstrated its commitment to this with the release of the *2023-24 Tasmanian Gender Budget Snapshot*, described as a step towards the future Gender Impact Assessment process that “will support those developing and advising on policy, funding and programs to consider gender at the outset of development of policy and spending initiatives.”⁶

The *2023-24 Snapshot* applies gender equality indicators to a selection of budget initiatives including the Government’s new housing package—a commitment to build 10,000 new social and affordable housing units by 2032—to comment on the strength of their contribution to gender equality. With its pledge to deliver a gender-responsive housing approach, we suggest the draft Strategy is well-placed to build on the work of the *Snapshot* by providing a gender budget analysis of Tasmanian housing policies and programs for inclusion in annual State Budget reporting.

The Tasmanian Government has an opportunity to elevate housing policy and planning in Tasmania with the introduction of a gender-responsive housing approach that is transparent and meaningful and we hope to see this commitment clarified in the final Strategy.

Recommendation 2. Provide greater clarity and emphasis on the Women’s Housing Research Report within the Strategy main document, including the commitment to incorporate findings from this research into the Strategy and its action plans.

Recommendation 3. Include the commitment to “apply and promote a gender-responsive approach to housing policies and programs across Tasmania” within the Strategy main document and give an indication of how this will be achieved—for example, implementing gender analysis tools and training within the housing sector.

Recommendation 4. Commit to delivering an annual gender budget analysis of Tasmanian housing policies and programs for inclusion in State Budget reporting that includes:

- How money is raised (for example through direct or indirect taxes, fees, fines and rental income) and how revenues are lost (for example through land tax exemption on first properties and unproductive incentives).
- How money is spent (including spending on public services, social welfare programs or infrastructure).
- Whether spending is sufficient to meet the practical and strategic needs of women, men, girls and boys.
- Whether the expenditure is contributing to closing the gender gap.
- How decisions on housing income and expenditure affect unpaid care work and subsistence work, and the distribution of these between genders.
- Whether spending in practice matches budget plans.⁷

QUESTION 4 – Theme three places ‘people at the centre’ of the draft Strategy. Are there additional or alternative objectives you recommend for consideration?

The draft Strategy puts forward a person-centred approach to housing, supported by the theme ‘people at the centre’. Objectives listed under this theme include embedding a Housing First

⁶ *2023-24 Tasmanian Gender Budget Snapshot*. Tasmanian Government, 2023.

⁷ Stephenson, M, *A Guide to Gender Responsive Budgeting*. Oxfam International, 2018.

approach, delivering population-specific housing responses, improving the accessibility of housing services, monitoring housing demand and housing program effectiveness, and incorporating lived experience into policy design. These are positive directions that we suggest could be augmented with an objective directed at the provision of a person-centred definition of safety in housing responses.

In 2020 Women's Health Tasmania undertook primary research into women's experiences of homelessness and produced a report called *Talking to women about homelessness, Tasmania 2020*.⁸ A key finding of the report was that safety for women experiencing or at risk of homelessness aligns closely with housing certainty and permanency, concepts rarely found in housing policy and programs. Women described the ways in which the absence of housing certainty and permanency results in profound and ongoing mental and physical health deficits. Women who are mothers reported impacts on their children also, despite their attempts to mitigate these.

Notably within the draft Strategy, safety is linked primarily with the provision of short-term and crisis accommodation. A comment on Safety under the 'people at the centre' theme states:

The provision of short-term accommodation is critical to help people out of a crisis, in particular Tasmanians escaping family violence so they are not forced to stay in or return to an unsafe environment. Programs that provide shelter accommodation or rapid rehousing will be continued and expanded to match demand, with a focus on larger homes for vulnerable families. (p.32)

Contributors to the *Talking to women about homelessness* research were clear that they valued short-term housing options, but that the permanency of securing a home was what allowed them to reclaim their lives.

I've always been a fighter... I've fought all my life for people and it's draining. I just want to find a house that we can start healing in, and not let anybody in, and it will be our peace. (p.10)

I'm ok. The house has made me ok. I don't think you realise that until you get that [key] and you suddenly go [exhales deeply]. (p.10)

That thing about whether you're homeless or at risk, I think we need to stop using that. It's not shelter-less, it's not couch-less, it's not roofless, it's not car-less, it's without a home and that's such a different thing. (p.10)

With its commitment to a person-centred housing approach and to ambitious targets, we urge the Government to raise the bar on safety and seek to deliver housing certainty and permanency for Tasmanians experiencing housing insecurity and homelessness. This may include providing longer-stay crisis and transitional accommodation as well as new long-term housing pathways and housing stock.

Recommendation 5. Strengthen the draft Strategy's interpretation of safety to include an objective directed at delivering housing certainty and permanency for people experiencing housing insecurity and homelessness.

Recommendation 6. Identify actions and activities to support the provision of longer-stay crisis and transitional accommodation as well as new long-term housing pathways and housing stock.

⁸ *Talking to women about homelessness, Tasmania 2020*. Women's Health Tasmania, 2020.

QUESTION 6 – Are there other ways the government could make its actions and progress to meet the proposed objectives more transparent and accessible?

Our comments on the transparency and accessibility of Strategy actions and progress are limited prior to seeing the reporting and governance mechanisms that will support it, including action plans, evaluation metrics and reporting obligations. Once available, public communication around these elements will be key to transparency.

Further to an earlier comment made—we suggest transparency is supported by ensuring all Strategy commitments and other significant content is named up in the main document rather than in supporting documents and webpages. Conceivably, language that is left out of the Strategy may be missed from the action plans and implementation processes that follow.

Finally, the type and extent of lived experience engagement undertaken to support the Strategy is central to its transparency and accessibility. A policy that commits to putting people at the centre should seek to undertake a best practice model of lived experience engagement. Evidence-based lived experience engagement frameworks are widely available and usually include commitments to principles of co-design, partnership and power-sharing.

Recommendation 7. Make publicly available key documents related to Strategy implementation and monitoring, including action plans, evaluation metrics and reporting obligations.

Recommendation 8. Ensure all Strategy commitments and other significant content is named up in the main document rather than in supporting documents and webpages.

Recommendation 9. Adopt a best practice framework for lived experience engagement and include measures against this framework in Strategy evaluation and reporting.

Conclusion

In conclusion, the draft Strategy is a well-crafted policy that with minor amendments promises to support a responsive, safe and person-centred housing approach for all Tasmanians, including delivering housing responses for at-risk groups such as women, older people, children and young people. Women’s Health Tasmania looks forward to the release of the final Strategy.

Summary of Recommendations

RECOMMENDATION 1	Provide further detail about the procedural and cultural changes that will support implementation of a Housing First approach in Tasmania—including new social housing eligibility processes, workforce training commitments, provision of wrap-around support services, and the mechanism for evaluating a Housing First approach.
RECOMMENDATION 2	Provide greater clarity and emphasis on the Women’s Housing Research Report within the Strategy main document, including the commitment to incorporate findings from this research into the Strategy and its action plans.
RECOMMENDATION 3	Include the commitment to “apply and promote a gender-responsive approach to housing policies and programs across Tasmania” within the Strategy main document and give an indication of how this will be achieved—for example, implementing gender analysis tools and training within the housing sector.
RECOMMENDATION 4	Commit to delivering an annual gender budget analysis of Tasmanian housing policies and programs for inclusion in State Budget reporting that includes: <ul style="list-style-type: none"> • How money is raised (for example through direct or indirect taxes, fees, fines and rental income) and how revenues are lost (for example through land tax exemption on first properties and unproductive incentives). • How money is spent (including spending on public services, social welfare programs or infrastructure). • Whether spending is sufficient to meet the practical and strategic needs of women, men, girls and boys. • Whether the expenditure is contributing to closing the gender gap. • How decisions on housing income and expenditure affect unpaid care work and subsistence work, and the distribution of these between genders. • Whether spending in practice matches budget plans.
RECOMMENDATION 5	Strengthen the draft Strategy’s interpretation of safety to include an objective directed at delivering housing certainty and permanency for people experiencing housing insecurity and homelessness.
RECOMMENDATION 6	Identify actions and activities to support the provision of longer-stay crisis and transitional accommodation as well as new long-term housing pathways and housing stock.
RECOMMENDATION 7	Make publicly available key documents related to Strategy implementation and monitoring, including action plans, evaluation metrics and reporting obligations.

Summary of Recommendations (continued)

RECOMMENDATION 8	Ensure all Strategy commitments and other significant content is named up in the main document rather than in supporting documents and webpages.
RECOMMENDATION 9	Adopt a best practice framework for lived experience engagement and include measures against this framework in Strategy evaluation and reporting.

For further information in relation to this submission please contact:

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