



public interest
ADVOCACY CENTRE

Submission to Inquiry into the Commonwealth Government's Response to the COVID-19 Pandemic

28 May 2020

About the Public Interest Advocacy Centre

The Public Interest Advocacy Centre (PIAC) is an independent, non-profit legal centre based in Sydney.

Established in 1982, PIAC tackles barriers to justice and fairness experienced by people who are vulnerable or facing disadvantage. We ensure basic rights are enjoyed across the community through legal assistance and strategic litigation, public policy development, communication and training.

Our work addresses issues such as:

- Reducing homelessness, through the Homeless Persons' Legal Service
- Access for people with disability to basic services like public transport, financial services, media and digital technologies
- Justice for Aboriginal and Torres Strait Islander people, through our Indigenous Justice Project and Indigenous Child Protection Project
- Access to affordable energy and water (the Energy and Water Consumers Advocacy Program)
- Fair use of police powers
- Rights of people in detention, including equal access to health care for asylum seekers (the Asylum Seeker Health Rights Project)
- Transitional justice
- Government accountability.

Contact

Alastair Lawrie
Public Interest Advocacy Centre
Level 5, 175 Liverpool St
Sydney NSW 2000

T: (02) 8898 6555

E: alawrie@piac.asn.au

Website: www.piac.asn.au



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@PIACnews

The Public Interest Advocacy Centre office is located on the land of the Gadigal of the Eora Nation.

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Recommendations

Recommendation 1 – Transfer people in held immigration detention into suitable community accommodation to prevent COVID-19

People currently in held immigration detention who do not pose a high security risk should be transferred out of detention facilities to reside in community detention or on a bridging visa, with priority given to people with pre-existing medical conditions that make them more vulnerable to poor outcomes from COVID-19.

Recommendation 2 – Improve conditions in immigration detention to prevent COVID-19

Where people are not released from held detention, at a minimum they should be provided with single rooms with their own bathroom facilities. This must be supplemented by other preventative measures, such as frequent cleaning of high-touch surfaces, availability and promotion of frequent hand hygiene, and rapid identification, isolation and tracing of cases of COVID-19.

Recommendation 3 – Ensure proximity to appropriate health services to treat COVID-19

People in held immigration detention, or housed in the community, should enjoy ongoing close proximity to the health services that are available in major metropolitan areas, including to respond to cases of COVID-19 where the person has pre-existing health conditions that increase the risk of serious illness from COVID-19.

Recommendation 4 – National essential services assistance measure

The Government should develop a National essential services assistance measure, in conjunction with energy and water providers. Assistance should provide support to all households and small businesses impacted by the response to COVID-19, with a focus on addressing the accumulation of debt and arrears.

Recommendation 5 – Principles-based recovery

The Commonwealth Government should adopt a transparent, principles-based criteria for the assessment of post-COVID-19 economic stimulus and rebuilding measures, that prioritise long-term benefits and targets those communities most impacted by COVID-19.

Recommendation 6 – Rapid re-housing framework

Work with States and territories to develop a 'rapid re-housing' framework to re-house people experiencing homelessness as soon as possible during and after the Covid-19 health crisis.

Recommendation 7 – Needs assessment framework

Work with States and territories to develop a needs assessment framework as the basis for provision of services, rather than designing services for particular cohorts or geographical areas.

Recommendation 8 – National framework towards ending 'no-grounds' evictions

Develop a national framework for tenancy legislation to work towards ending 'no-grounds' evictions nationally.

Recommendation 9 – Increases in payments to avoid poverty

Increase the level of JobSeeker and related allowances permanently so recipients do not live in poverty, and develop a review mechanism with input from an independent expert commission.

Recommendation 10 – Review mutual obligations

Review mutual obligations requirements to make them realistic and ensure they do not unnecessarily place social security recipients at risk of homelessness. Implement mechanisms to ensure rent payments are still made when payments are suspended due to failure to comply with mutual obligation requirements.

Recommendation 11 – Review JobKeeper

Review and amend the JobKeeper scheme in order to reduce the number of people excluded from the scheme.

Recommendation 12 – Phase out JobKeeper

Create a plan to progressively phase out JobKeeper rather than terminate the scheme abruptly.

Recommendation 13 – Eligibility for income support based on need

Determine eligibility for income support via an assessment of need, rather than a list of arbitrary criteria.

Recommendation 14 – Trauma-informed practice framework

Development of national framework for standards of trauma informed practice within both state and commonwealth organisations.

Recommendation 15 – Social housing-led recovery

Develop a social housing led recovery strategy, with input from national housing and homelessness peak bodies, to deliver 30,000 social housing dwellings over the next three years.

Recommendation 16 – Fund ‘wrap-around’ services

Provide additional funding to SHS for ‘wrap around’ support services including assistance to maintain tenancy for vulnerable people, through the NHHA or another funding mechanism.

Commonwealth Government Response to the COVID-19 Pandemic

PIAC thanks the Committee for the opportunity to provide a submission to this important Inquiry.

Our submission focuses on three issues in relation to which PIAC has relevant expertise:

- The need to mitigate the risk of COVID-19 infection posed to people in immigration detention facilities;
- Protecting the interests of energy and water consumers; and
- Developing and implementing long-term solutions for people experiencing homelessness.

1. Asylum Seeker Health Rights

PIAC's Asylum Seeker Health Rights project aims to secure humane standards of medical and mental health care for asylum seekers in Australia's onshore immigration detention centres.

In response to urgent health issues arising for people in immigration detention because of the COVID-19 pandemic, PIAC has called on the Commonwealth Government to adopt health experts' advice and transfer people out of held immigration detention into the community.¹

On 7 May 2020 PIAC filed a group complaint with the Commonwealth Ombudsman for 14 detained asylum seekers in Australian facilities who fear that an outbreak of COVID-19 could prove catastrophic for the detained population, staff and the broader community.² We have asked the Ombudsman to conduct urgent inspections of facilities and investigations into the circumstances of our clients, as well as all detainees, to examine the appropriateness of conditions and adequacy of measures being taken to mitigate and manage the dangers posed by COVID-19 to detainees and staff.

While we await the Ombudsman's response, we draw the Committee's attention to the issues involved and the action that the Government can and should take to respond to the risks posed.

1.1 COVID-19 Issues

The novel coronavirus SARS-CoV-2 is major public health challenge across the community. Two of its characteristics make it a particular challenge for immigration detention facilities:

- i. It is highly infectious in enclosed environments, especially where there are large numbers of people sharing limited space. This has been demonstrated, unequivocally, by the disproportionate contribution of cruise ship transmissions to Australia's overall tally of confirmed coronavirus cases – the *Ruby Princess* alone is estimated to have resulted in 1 in 10 of *all* Australian cases.³
- ii. People with pre-existing medical conditions experience worse outcomes as a result of coronavirus infection. While fatality rates increase with age more broadly, the risk of hospitalisation, treatment in intensive care and death are also heightened among

¹ PIAC, Media Release, 'Federal Government must act urgently to avoid COVID-19 catastrophe in immigration detention', 2 April 2020, available at: <https://piac.asn.au/2020/04/02/federal-government-must-act-urgently-to-avoid-covid-19-catastrophe-in-immigration-detention/>. Australian immigration detention facilities include hotels in Melbourne and Brisbane that are being used as alternative places of detention.

² PIAC, Media Release 'COVID-19: group complaint for asylum seekers at risk in immigration detention calls for urgent investigation', 7 May 2020, available at: <https://piac.asn.au/2020/05/07/covid-19-group-complaint-for-asylum-seekers-at-risk-in-immigration-detention-calls-for-urgent-investigation/>.

³ ABC News, *Australia's coronavirus death toll rises after 81yo Ruby Princess passenger becomes latest fatality*, 13 May 2020.

people of any age whose immune system is significantly weakened (for example due to haematologic neoplasms such as leukaemias) or who have co-morbidities such as:⁴

- Chronic renal failure
- Coronary heart disease
- Congestive cardiac failure
- Chronic lung disease such as severe asthma, cystic fibrosis, bronchiectasis, suppurative lung disease, chronic obstructive pulmonary disease or chronic emphysema
- Poorly controlled diabetes, and
- Poorly controlled hypertension.

1.2 COVID-19 Implications for Immigration Detention

The specific implications of COVID-19 for Australian immigration detention facilities have been confirmed by infectious disease specialist Professor Joshua Davis, in a report provided to the Commonwealth Ombudsman as part of PIAC's complaint:

The most important measure to reduce the risk of spread of COVID-19 is to decrease the population density in a given area. The Australian Department of Health have recommended that, in indoor settings, people keep at least 1.5m distance between each other at all times, and that at least 4m² of floor space is available per person. Other important measures are to:

- i) Increase ventilation of indoor spaces by allowing natural airflow through widely open windows;
- ii) Frequent cleaning of all high-touch surfaces including bathrooms, dining areas, door knobs, light switches etc;
- iii) Availability and promotion of frequent (before and after touching any surface and object, before and after eating) hand hygiene – either soap and water with facilities for drying hands, or alcohol-based hand rubs;
- iv) Rapid identification and isolation of cases of COVID-19, and quarantining of their close contacts.

While detainees are held in different facilities that may involve different conditions, there are some features common to all:

- Each place of detention contains several or many individuals, kept in relative confinement, with little or no access to the outside;
- There is a prospect that Detainees need to share rooms, or will do so in search of company. The rooms shared can include kitchens, dining rooms, bathrooms and bedrooms;
- There is a likelihood that daily or regular contact will occur amongst the Detainees, including communal mealtimes; and
- Although visiting rights have been cancelled, the Detainees are exposed to persons from outside the place of detention including security staff, cleaning staff, health professionals.

Professor Davis has identified that these conditions of detention 'significantly increase the risk of a Detainee contracting COVID-19, as compared with people living in community settings' for these reasons:

- i) It is difficult or impossible to avoid overcrowding (meaning having more than one person per 4m² and/or <1.5m between Detainees) in this setting
- ii) Frequent hand hygiene (as defined in [the question] above) is not possible unless Detainees have ready access to either alcohol-based hand rub or a sink at all times

⁴ Department of Health, *Coronavirus (COVID-19) advice for people with chronic health conditions* (23 April 2020).

- iii) Rapid identification of cases means that a Detainee would need to be assessed by a doctor and, if needed, have a swab taken, as soon as possible (on the day of symptom onset)
- iv) Isolation of cases of COVID-19 would require a case to either be immediately sent to hospital or be put in their own room with their own bathroom, eating in their room, and be regularly checked by a doctor.

Concerns about the high risk of COVID-19 transmission in immigration detention facilities were also highlighted in a joint public letter by more than 1180 healthcare professionals, led by infectious diseases specialist Professor David Isaacs on 1 April 2020,⁵ and in a joint public letter by the Australasian Society for Infectious Diseases (ASID), and Australasian College for Infection Prevention and Control (ACIPC), published on 19 March 2020:

We understand that around 1400 asylum seekers and other non-citizens are being held in detention in crowded conditions that would preclude adequate social distancing or self-isolation. This would potentially pose a risk to their health in the event of an outbreak of COVID-19, as outbreaks in other crowded settings, including detention facilities, have been well documented to date. This would also potentially pose a risk to staff who work at immigration detention facilities and, through the amplification of infection, the broader Australian community.

Based on the latest, publicly-available immigration detention statistics, there has not been a significant reduction in the numbers of people held in detention facilities, with a total of 1373 immigration detainees in secure facilities in March 2020, compared to 1432 and 1440 in January and February 2020 respectively.⁶

Immigration detainees also experience significant levels of health comorbidities, exposing them to greater risk of poor outcomes should they be infected with COVID-19.

The 14 clients included in PIAC's complaint to the Commonwealth Ombudsman live with a range of serious pre-existing medical conditions, including:

- Renal failure
- Heart disease
- Lung disease such as asthma
- Diabetes and
- Certain cancers.

The Commonwealth Ombudsman has previously reported that people seeking asylum held in immigration detention for prolonged periods experience a 'significantly larger number of both mental and physical health problems',⁷ based on data released by the then Department of Immigration and Citizenship in 2010.

⁵ Matt Coughlan, 'Doctors call for refugees to be released', *Australian Associated Press* (online) 3 April 2020 <<https://www.aap.com.au/doctors-call-for-refugees-to-be-released/>>

⁶ Australian Border Force, *Immigration detention and Community Statistics Summary*, 31 March 2020, 29 February 2020 and 31 January 2020.

⁷ Commonwealth Ombudsman, *Suicide and Self-Harm in the Immigration Detention Network Report No 2* (2013) p60.

Given the extended timeframes of many people seeking asylum currently in held detention, this would mean they are also at greater risk of hospitalisation, treatment in intensive care and death from COVID-19.

1.3 Solutions

The Commonwealth Government should act upon the advice of experts such as Professor Davis, the ASID and ACIPC in preventing adverse outcomes for people in immigration detention as a result of COVID-19.

The first, and most important, action the Commonwealth Government should take is to transfer detainees who do not pose a high security risk from held immigration detention to reside in community detention or on a bridging visa. People with particular vulnerabilities should be given priority in this process, and be removed from the acute risks of held detention immediately.

By placing people in suitable housing in the community, it would allow them to physically distance from each other and take other appropriate preventative actions.

ASID and ACIPC endorsed this approach in their open letter of 19 March 2020:

We urge the Commonwealth government to consider the release of detainees into suitable housing in the community if they do not pose a significant security or health risk.

Moving as many detainees as possible into community housing would have the added advantage of reducing crowding for any people seeking asylum who remain in held detention.

Where moving detainees into the community is not actioned, we endorse the further comments of ASID and ACIPC:

As a minimum standard, we would recommend that detainees should be held in single rooms with their own bathroom facilities. While this would not fully address the risk associated with COVID-19, and it certainly would not be as effective as reducing the overall numbers in immigration detention facilities, it would go some way to reducing the risk and could be considered the absolute minimum necessary step.

This should be accompanied by other supportive measures, such as frequent cleaning of high-touch surfaces, and availability and promotion of frequent hand hygiene.

It would also require, as recommended by Professor Davis, rapid identification and isolation of cases of COVID-19, and quarantining of their close contacts, as well as making sure that people seeking asylum who contract COVID-19 have access to appropriate health services, including to deal with any complications from their co-morbidities.

This last requirement means that, whether housed in the community or continuing to be held in detention, people being held in detention will need to remain to close proximity to the health services that are available in major metropolitan areas.

It is important that measures adopted to minimise the risk of detainees contracting COVID-19 in immigration detention respect the human rights and dignity of detainees and do not in themselves cause harm. For example, placing a detainee in solitary confinement or isolation may lead to the deterioration of mental health and the suffering of mental harm. All risk-minimisation measures should take into account a detainee's background and health issues, including any mental health concerns and whether they history of torture or trauma.

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2. Energy and Water Consumers

PIACs Energy and Water Consumers' Advocacy Program (EWCAP) represents the interests of low-income and other residential consumers of electricity, gas and water in New South Wales. The program develops policy and advocates in the interests of low-income and other residential consumers in the NSW energy and water markets, with a focus on ensuring their continued affordable and sustainable access to essential services. PIAC receives input from a community-based reference group whose members include:

- NSW Council of Social Service;
- Combined Pensioners and Superannuants Association of NSW;
- Ethnic Communities Council NSW;
- Salvation Army;
- Physical Disability Council NSW;
- Anglicare;
- Good Shepherd Microfinance;
- Financial Rights Legal Centre;
- Affiliated Residential Park Residents Association NSW;
- Tenants Union;
- The Sydney Alliance; and
- Mission Australia.

2.1 The Commonwealth Government response to date

Sustaining affordable access to essential energy and water services is fundamental to an effective response to a public health crisis. This is particularly true for the COVID-19 pandemic, where social movement and interaction has been restricted and the community has been required to remain at home. The public health response to COVID-19 also resulted in significant business shutdowns, reduced trade, and restrictions and reductions in employment. The nature of the response to COVID-19 means measures to prevent the accumulation of household arrears and debt are also crucial in minimizing the pandemic's longer-term health, social and economic impacts on the community.

At the outset of the pandemic, PIAC in co-operation with a range of community organisations from across Australia, called for a coordinated industry and Government response to maintain access to essential energy and water services, support the public health response and prevent damaging debt accumulation⁸. The coordinated response from the Commonwealth Government and the banking industry to defer repayments for customers affected by COVID-19 is an example of the co-operative approach needed in the energy and water sector. While there have been notable steps at a state level, including the NSW Government expanding its Energy Accounts Payment Assistance (EAPA), the absence of coordinated action for essential services is a continuing gap in the COVID-19 response.

Without specific support maintaining access to essential services, the Commonwealth Government's payment support programs are critical. In this context, PIAC notes the following issues with the coverage of these programs and the way in which they have been implemented.

⁸ Community joint statement <https://piac.asn.au/wp-content/uploads/2020/03/COVID-19-National-Energy-Hardship-Relief-Package.pdf> March 2020

2.2 JobKeeper work subsidy payment

The implementation of the JobKeeper payment, provided through employers to all eligible employees has been the most significant measure in the economic and community response. The size of the payment, its flat rate and being paid through employers has helped keep people connected to their place of employment, been relatively quick to implement, and provided meaningful support for people to maintain housing and afford essential services.

However, the JobKeeper framework excludes a range of workers, including non-resident visa holders, many casuals, and freelancers. This fails to recognise the flexible nature of employment for a large proportion of the population, particularly in hospitality, the arts and tertiary education. Further, the complications in eligibility and the delay in payment commencement has limited uptake, leaving hundreds of thousands of people and small businesses without access to income or payment supports. This has made the coverage and the adequacy of the JobSeeker payment, vital.

2.3 JobSeeker payments and the Coronavirus supplement

The Coronavirus supplement, effectively doubling payment support for the unemployed and many others receiving payments, is welcome. However, the eligibility criteria, in conjunction with the rapid nature of many people's experience of unemployment, has complicated access to JobSeeker payments and left many people ineligible including:

- Those on bridging visas
- International students
- Temporary resident visa holders
- Working holiday visa holders
- New Zealand citizens
- Other current non-visa holders

As of April this year, approximately 1 million people⁹ were ineligible for JobSeeker, with no guaranteed income, no recourse for support, and a requirement to remain in place, with rent, utilities and other essential payment commitments. Many of these groups are also without access to Medicare. The lack of access to JobKeeper or JobSeeker makes an essential service support payment crucial. Without one, the Commonwealth Government will leave many people unable to access essential water and energy services without accumulating debt or sacrificing their health and comfort. Without addressing these gaps, the Government is also compounding the significant issue of debt accumulation within the community, undermining the sustainability of the community and its ability to rebound and rebuild after the pandemic has subsided. Addressing these gaps should be the first step in a transition from public health response to recovery and rebuilding.

Recommendation 4 – National essential services assistance measure

The Government should develop a National essential services assistance measure, in conjunction with energy and water providers. Assistance should provide support to all households and small businesses impacted by the response to COVID-19, with a focus on addressing the accumulation of debt and arrears.

⁹ Australian Red Cross, 2020 & Minister Alan Tudge media release 4 April 2020

2.4 The transition from health response and economic support to rebuilding

The focus on expert, evidence-based responses to the COVID-19 public health crisis has been very welcome. The communication of clear health and community objectives, based on expert advice has been a strength of the Government response, and a major driver of widespread community support for the measures taken. Economic support has been key in facilitating the community response to the health crisis, with free childcare, the Coronavirus supplement and the JobKeeper payments particularly vital. Similarly, the co-operation between Commonwealth and State and Territory Governments, which has seen consistent messaging and coordinated measures, has generated community confidence and has helped make government support measures more effective.

We highlight these aspects of the Government's actions because they will be crucial to ensuring the success of, and community support for, the ongoing response to the health and economic crisis resulting from COVID-19 as we transition to rebuilding the economy. Transparent processes informed by evidence and based on clearly defined principles are crucial. The community must have confidence that the rebuilt economy will be more resilient, equitable and sustainable in the long term.

2.5 A principles-based recovery

We are already beginning to see proposals for economic recovery, with a range of think tanks, industry representatives, community groups and others presenting their recommendations for stimulating and rebuilding the economy. This discussion is important, and many of these ideas merit further exploration. In plotting the most effective and appropriate path forward it is not enough to view proposals through a simple economic benefit lens that looks only at short term cost reduction, or income generation. The Government should establish clear principles for the recovery to ensure it is a consistent, targeted program of policies that maximise the impact of the significant spending that will be undertaken.

PIAC notes the framework developed by the Australia Institute¹⁰, which provides a transparent, principles-based set of criteria for assessing proposals. We strongly recommend that the following principles, building upon those developed by the Australia Institute, be adopted now, as part of a transparent process assessing and developing policy for recovery and the rebuilding:

- **Target domestic production**
The response to COVID-19 has severely impacted international travel linkages, with devastating impacts on tourism, accommodation, hospitality, education and related industries. Measures for rebuilding and recovery should aim to fill the significant gaps that have emerged by targeting measures to support domestic production.
- **Target activities with high direct employment intensities**
The significant unemployment created by the COVID-19 crisis is likely to continue and worsen, particularly in regional areas dependent on travel and tourism. Measures that are labour intensive, particularly those that involve a significant proportion of lower-skilled (or easily upskilled) labour will be needed to reduce unemployment. Employment intensive projects with long-term potential should be highest priority, particularly in regional areas.
- **Target those most impacted by the crisis**
While the impacts of COVID-19 and the community response to it, have been widespread, the worst impacts will continue to be felt by certain industries and sections of the community. Measures that target these worst-hit groups should be prioritised, particularly where these

¹⁰ The Australia Institute. [‘Design principles for a fiscal policy in a pandemic: how to create jobs in the short term and lasting benefits in the long term.’](#) April 2020.

deliver ongoing benefits to the community, such as hospitality and tourism, arts and performance, and education and research.

- **Target useful projects that deliver co-benefits**

Beyond the COVID-19 crisis the country faces serious issues responding to the impacts of climate change, addressing economic inequality, closing the gap between Indigenous and non-Indigenous communities, preventing species and natural habitat loss, addressing the waste management crisis and the structural loss of employment to new technologies.

Recovery measures should maximise the long-term benefit to the community by contributing to improvements in other key areas of national significance.

- **Target regional disadvantage**

COVID-19 impacts have disproportionately affected regional areas that are heavily reliant on tourism and travel, food production, and highly seasonal economic opportunities (such as festivals, harvests and environmental tourism). Many of these areas are already struggling with regional decline, the escalating impacts of climate change and the devastation of drought and bushfires. Measures that support these areas with long-term opportunities for sustainable growth should be prioritised.

- **Build resilience**

In the wake of severe drought and bushfires and in light of worsening climate change, the need for resilient economies and communities has become increasingly important. Recovery measures should not look to only replace and restore, but should aim to rebuild so that the Australian economy is more resilient to shocks (such as those delivered by pandemics, international disputes and trade disruptions, natural disasters and industrial transitions), and more capable of supporting the long-term prosperity and sustainability of the community. Particular priority should be given to measures which help build resilience to the impacts of climate change.

- **Deliver long term benefits**

Responding rapidly, with fast-acting measures was critical in the initial phases of the public health response to COVID-19. Measures, such as the Coronavirus supplement and JobKeeper payment were structured and implemented to be rolled out as rapidly as possible. As we transition to the rebuilding phase, attention must be paid to the timing of benefits of any measures taken by the Government, with priority given to those that have both short and long-term payoffs. It will also be crucial to avoid 'streamlining' responses – compromising the integrity for the sake of rapid implementation – where this undermines their long-term benefits. Where measures are likely to invite known future risks, they should not be prioritised.

These priorities must be considered in any assessment of potential responses to economic reconstruction and recovery, with the chosen suite of measures being those that can satisfy the most while delivering a significant 'quantum' of benefit as determined through more conventional assessments of cost and benefit. As an indication of how this framework of priorities may be applied, PIAC presents the example of investment in household energy efficiency as a potential measure.

2.6 Household energy efficiency retrofit program

Many existing programs and policy processes have identified the significant potential benefits of household energy efficiency improvements. These provide the basis for rapid effective expansion into an economic recovery measure that rapidly accelerates the upgrade of existing housing and building stock. Using the assessment principles above:

- **Target those most impacted by the crisis**
 By directly addressing household energy and water use and the affordability of essential services, the program provides material financial relief to households impacted by reduced employment and other financial impacts of COVID-19. The rollout of the program can also be structured so as to commence with measures to address poor quality rental properties, social and community housing, and low-income home owners for whom any improvement in household efficiency will provide more significant financial relief.
 By requiring the expansion of a workforce across a range of skill and services, including construction and installation trades, building product manufacture, delivery and logistics, sales and administration, household assessment, and accreditation, an efficiency retrofit program is able to provide opportunities to a wide range of people who have lost employment. Opportunities could be targeted at impacted workforces such as aviation engineering staff and production and technical support staff from the arts industry.
- **Target domestic production**
 Efficiency retrofits involve work undertaken domestically, upgrading housing within Australia. The workforce in any program is likely to be domestic, particularly in the early stages where international travel is restricted. Any program could be structured to further preference domestic production by including Australian product quotas, and be rolled out in conjunction with programs supporting trade and skills development.
- **Target activities with high direct employment intensities**
 An energy efficiency retrofit program is very employment intensive, creating direct and indirect employment opportunities across the entire community, not only in regions or communities that it may target. Depending on the scale, scope and nature of a retrofit program, it would provide a significant boost to employment in:

 - Construction and trades
 - Manufacturing and material
 - Sales, assessment and administration

Importantly, the significant number of jobs generated would be of a relatively long duration, developing an important skills base and further indirect jobs (such as in logistics and delivery, information technology and communications, and other services) throughout the community.
- **Target useful projects that deliver co-benefits**
 Poor household energy and water efficiency increases bills, makes homes less comfortable and healthy, increases fixed energy and water system costs and increase emissions. Widespread upgrades to household energy efficiency would provide significant benefits to household health and financial stability, to systemic health costs, energy system costs, and carbon pollution reduction targets. An energy efficiency program also offers the opportunity to target specific cohorts, such as remote aboriginal communities with high energy costs and significant health issues, which in turn support other areas of community development.
- **Target regional disadvantage**
 A large-scale energy efficiency upgrade program could be implemented in stages, with areas most impacted by COVID-19, regional decline or industry transition targeted first. This could include regions previously reliant upon fossil fuel mining or energy generation facing closure, regions with high rate of structural unemployment, regions with significant populations of disadvantaged Indigenous communities, and regions heavily reliant on international tourism.
- **Build resilience**
 The recent extreme drought and bushfires have brought the issue of resilience to the fore. Climate change is already demonstrating the need for communities and their economic supports to be more resilient to shocks and disasters and the risks of increasingly frequent and intense changes. Household energy efficiency helps to improve the community's resilience to extreme temperatures that are already impacting community health and wellbeing. It can also contribute to resilience by reducing load on the energy system when it is constrained or at capacity, making household generation and storage more practical, and

helping to ensure regional communities remain viable as temperatures become more extreme.

- **Deliver long-term benefits**

Perhaps most importantly, improvements to household energy efficiency deliver benefits that are not only immediate, but that persist long into the future. The immediate economic stimulus provided by widespread increases in jobs, production, manufacturing and other services will, depending on the nature of the program, persist years into the future while providing opportunities to alter and adjust according to the status of the economic recovery. However, the benefits to household health and affordability, systemic efficiency and carbon pollution reduction are permanent, accruing long beyond the life of the program.

Recommendation 5 – Principles-based recovery

The Commonwealth Government should adopt a transparent, principles-based criteria for the assessment of post-COVID-19 economic stimulus and rebuilding measures, that prioritise long-term benefits and targets those communities most impacted by COVID-19.

3. Homelessness

In 2004, PIAC established the Homeless Persons' Legal Service (HPLS). HPLS has provided legal assistance to more than 8,000 people who are homeless or at risk of homelessness, on over 11,000 occasions. HPLS provides free legal advice at 16 legal advice clinics Sydney and the Hunter.

In 2009, PIAC established its homeless consumer advisory committee StreetCare, whose members have lived experience of homelessness. StreetCare is a diverse group, including women and men of different ages, Aboriginal people, and representatives from inner Sydney, outer suburbs and rural and regional areas. With support from PIAC, StreetCare provides direct input from people with a lived experience into government policy making and law reform initiatives, to tackle the structural determinants of homelessness.

This section relates to the impact of the Australian Government response to the COVID-19 pandemic on people experiencing any form of homelessness, including rough sleepers, and people at risk of homelessness such as vulnerable tenants and people receiving social security payments.

It is based on HPLS legal work with clients experiencing or at risk of homelessness during the pandemic, our collective advocacy work with the housing and homelessness sector, and our participation in various NSW rough sleeping taskforces and working groups.

Based on our experience working with stakeholders, including the NSW Government, during the pandemic, our reflections are mixed. HPLS and StreetCare recognise that some policy changes implemented (such as increases in social security payments and the provision of good quality temporary accommodation) have long been sought by HPLS and the community services sector. These changes have been welcomed, and have brought timely and significant results. These changes have demonstrated that it is possible to end homelessness and poverty in Australia.

However, many challenges remain. We must work to secure long-term solutions for people experiencing homelessness, ensuring there are no returns to homelessness after the COVID-19 crisis has ended. Many people, including non-citizens, are ineligible or otherwise excluded from the supports put in place, and risk falling into homelessness and/or severe financial hardship. Unless urgent action is taken to ensure that everyone in our community has the level of support they need, continuing gaps in support will impede recovery and exacerbate pressure on social security and other support systems over time.

We briefly describe some of the issues with the Australian Government response regarding homelessness and associated policy areas, before outlining four policy responses that could contribute to both ending homelessness and shaping a rapid and fair economic recovery. HPLS is aware that some of the issues raised are state responsibilities, including provision of temporary accommodation and social housing. It is essential, however, that the Commonwealth and State and Territory governments work together to address complex issues such as homelessness and poverty, especially in the context of a severe economic downturn. PIAC is of the view that the National Cabinet process has shown the capacity of all levels of government to work together to deliver positive outcomes, and would like to see this high level of collaboration continue in order to end homelessness.

3.1 Success and challenges of the COVID-19 response

COVID-19 has exposed the scale and severity of homelessness in Australia, both as a social and as a public health issue. This is particularly true for primary homelessness, that is rough sleeping.

So far the COVID-19 response has been successful in providing temporary accommodation and connecting some rough sleepers with services, as well as protecting some tenants in financial hardship from eviction. It is likely, however, that the number of people at risk of homelessness will continue to increase in the coming weeks and months. The lockdown and associated economic recession will exacerbate our systemic housing and homelessness policy issues. Gaps in the housing and homelessness policy response to COVID-19 and its socio-economic consequences are often a reflection of pre-existing issues, that will prevent rapid economic recovery if they are not addressed.

3.1.1 A rapid housing response overly geographically focused and insufficiently resourced

Treating rough sleeping as a public health issue for the duration of the crisis has allowed government to achieve significant results in getting inner-city rough sleepers off the streets. From HPLS's perspective, however, the response should be both broader geographically and less strongly focused on rough sleeping. From a public health perspective, other forms of homelessness such as overcrowded dwellings and marginal forms of rental accommodation where occupants share facilities (including boarding houses, lodging houses, and share houses) also warrant attention. While States have unlocked additional funding for temporary accommodation (TA) during the health crisis, the number of spots offered in locations with high need became quickly insufficient to adequately house all rough sleepers.

Stronger federal support could have assisted in ensuring TA was provided to not only rough sleepers, but all those experiencing homelessness, for as long as needed. In NSW, TA was only offered to inner city rough sleepers. Other areas missed out, creating a significant public health risk in addition to exacerbating regional inequality. HPLS solicitors have encountered great difficulty in attempting to secure temporary accommodation for clients in rural and regional areas during the COVID-19 crisis. Other cohorts such as people released from the criminal justice system were not included in the scheme, making the response effective but relatively limited. The rapid housing response to rough sleeping should be broader and more strongly resourced in order to provide meaningful solutions to homelessness

Furthermore, there has been a lack of exit planning for those rough sleepers who have been provided temporary accommodation. StreetCare knows of several individuals who were offered 30 days of TA at the beginning of the crisis period and who are already back on the streets, due to insufficient exit planning and a lack of security about future accommodation.

Case Study: Mark

Mark has multiple mental health and substance use concerns, and he has a high need for support. He was sleeping rough when the COVID-19 crisis began, and he and several of his friends were offered temporary accommodation. However, their experiences demonstrate that there has been a lack of long-term support and exit planning for individuals who were provided with 30 days of TA. Mark says,

“There appears to be no obvious exit strategy. Even with the pandemic still declared people are returning to the streets. [My friend] was told last week he had a further week of TA, but the next morning he was back on the park bench. [Another mate] was given 37 nights in three different places which simply ended yesterday with no further support or accommodation. He has jumped the Greyhound [bus] and he hopes to go up to Cairns. Housing are still visiting most mornings, outreach services are handing out rooms, but no one is suggesting there is anything after. The general assumption and belief is it's back to sleeping rough. In my own situation it was twenty nights and then back on a train bench seat for sleep.”

3.1.2 Limited eligibility limits support to economic demand and will cause some to fall through the cracks

HPLS has long advocated for adequate social security payments, set at a level that would prevent recipients from falling well below the poverty line. We welcome the temporary increase to social security payments announced as part of the COVID-19 response. Increased payments can help both prevent people becoming homeless and/or experiencing severe financial hardship, and can support demand for goods and services during a time of economic downturn. We note, however, that many people are excluded from the scheme, which mean there is sustained pressure on homelessness services, food banks and other charities, during and after the emergency response. People receiving payments such as the age pension, the Disability Support Pension (DSP), and people who are carers, are missing out. So are migrant and casual workers, international students, temporary visa holders including refugees, and asylum seekers on bridging visas.

Restricting eligibility for support and services based on arbitrary criteria means that some individuals who may demonstrate equal need are excluded from support. Determining the provision of support based on an individual's capacity to fit into pre-determined eligibility criteria, rather than an assessment of genuine need, results in programs which are limited in their effectiveness to address the problem at hand.

Case Study: Susan

Susan is currently receiving the aged pension with a carer supplement for supporting her son, who has multiple mental health issues. Susan previously found the state department responsible for social housing extremely difficult and traumatising to deal with, and therefore chose to rent privately. While this was barely affordable before the COVID-19 crisis, the loss of Susan's casual job in the crisis period means her current rental payments are unaffordable for her.

Because Susan receives the aged pension, rather than JobSeeker, she is unable to receive the COVID-19 supplement payment from Centrelink. She is not eligible for state government private rental assistance products, as some are not available in her geographical area, and others require she demonstrate her current rental property is affordable for her. The unaffordability of the property is consequently both the reason she requires support and a barrier to that support.

Susan has attempted to negotiate a rent reduction with her landlord, due to her loss of income, however so far the landlord has been unwilling to negotiate. Susan does not want to pursue this avenue further as she fears this will threaten her tenancy and she will be evicted under a 'no grounds' provision.

The restriction of support based on arbitrary criteria, such as geographical location and age, therefore means that people like Susan, who nonetheless can demonstrate real need, are excluded from supports and services that would prevent homelessness.

Anglicare Rental Affordability Snapshot 2020¹¹ shows only 0.4% of properties on the private rental market are affordable for DSP recipients at this level of payment. Not only does this exclusion place them at risk of homelessness, and financial hardship, but economic damage and pressure on social security systems will only be exacerbated further down the track.

¹¹ Anglicare Australia (2020) *Rental Affordability Snapshot 2020*. Available [here](#).

3.1.3 The onus remains on vulnerable individuals to access complex systems and resolve situations with considerable power imbalance

PIAC supports the temporary suspension of mutual obligation requirements for social security recipients, as this will remove a barrier for vulnerable people trying to access support. The system of placing the onus on vulnerable people to access complex systems was a problem before the COVID-19 crisis, and has remained an issue in the approach taken. It is likely that many people will have to access social security payments for the first time during the economic crisis associated with the COVID-19 health crisis. It is important that support services and measures are in place so this support can be accessed easily and in a timely manner.

The Australian Government should provide services that are efficient and accessible, and avoid overreliance on ‘the market’ and the private sector. HPLS, for example, has identified issues with over reliance on negotiation for rent reductions for COVID-19 impacted tenants in the private rental market in NSW. Due to the significant imbalance of power, this is causing issues for vulnerable tenants, who are placed in severe financial hardship due to their inability to negotiate an appropriate rent reduction. We also have concerns about the amount of debt that may be accumulated by some over the course of the crisis. The choice of the Australian Government to rely on negotiation for residential tenancy management, instead of providing a mandatory code similarly to commercial tenancies, has and will continue to cause issues.

The lack of trauma-informed practice within these systems is also another major barrier for individuals requiring support. StreetCare is aware that individuals commonly experience the system as lacking in person-centred support that is required to allow individuals with complex trauma to engage sustainably. Often this comes down to a lack of trauma-informed practice of the staff and organisations which has a negative effect on individual’s experiences, leaving them unwilling to engage with supports and services because when they have done so in the past, they have had negative experiences marked by criticism and a lack of understanding. The lack of a national framework for trauma-informed practice means that there is little guidance for agencies, and approaches often fall short of good practice standards.

3.2 Policy proposals to end homelessness and spark rapid economic recovery

The COVID-19 health crisis and its associated policy response have created a unique opportunity to end homelessness and create a fairer Australia. We should not return to our previous policy framework – instead, it is vital that we work towards a stronger, more resilient social safety net and housing system.

HPLS has policy proposals guided by four principles in order to achieve this:

- No return to the streets;
- No return to poverty traps;
- Building for the future; and
- Supporting people to end homelessness permanently.

3.2.1 No return to the streets: Ending and preventing rough sleeping

Ending and preventing rough sleeping should be a guiding principle for housing and homelessness policy in Australia in recognition of the human right to adequate housing and its public health benefits. In order to avoid the issues mentioned in part 3.1.1, the rapid housing response should be more broadly available and sustainably resourced. People housed in temporary accommodation (TA) should not be expected to return to rough sleeping and should be provided with adequate housing exit options. If there are no options currently available, TA

should be provided until a suitable exit option is identified. This principle is to be understood as a bare minimum, as other forms of homelessness should also be addressed. The idea that people rough sleeping should be offered housing immediately and until an appropriate long-term exit option is identified, should be implemented permanently, as there will continue to be an inflow into street homelessness as long as structural issues in the housing and social security systems remain.

This inflow into homelessness is sometimes exacerbated by restrictive eligibility criteria which mean that some people are excluded from assistance, regardless of their level of need, based on an arbitrary distinction such as geographical area. Product design needs to include a needs-assessment as the basis for the provision of services and support, rather than relying on eligibility criteria which do not adequately reflect the level of need the individual is facing.

Principle 3, 'building for the future', argues for a national plan to build sufficient social and affordable housing. Addressing this long term shortage will take a significant time, so while social housing will be the preferred option for many people rough sleeping, other options should be considered in the meantime. Alternative options may include: private rental subsidies for people with the capacity to maintain a tenancy, policies that facilitate head leasing of properties by Community Housing Providers and urgent building of more 'Housing first' models with support services such as 'Commonground' in Sydney. In our view, there needs to be a mix of diverse models to address the different needs of varied people. While housing is primarily a state responsibility, the Australian Government has a role to play in working with the States and Territories, especially around financing arrangements. It is essential to note that private rental subsidies are more costly in the long term than providing social housing, and such subsidies should be implemented along with a national plan to increase the supply of social and affordable housing to adequate levels. This should be an incentive to transition people from medium term solutions such as private rental subsidies to social housing as it is more financially viable for government.

Along with other legal services, we welcomed the announcement of a national moratorium on evictions as part of the COVID-19 response. This has been key to preventing homelessness and allowing people to isolate at home during a period of significant uncertainty. We believe this has been successful overall, despite some state-based implementation issues. One major issue that remains in most jurisdictions is the possibility for landlords to serve a 'no-grounds' evictions, effectively creating a loophole in the moratorium. No-grounds evictions can also be retaliatory in response to tenants asserting their rights, a practice that is outlawed, but hard to prevent. 'No-grounds' evictions undermine every other right that tenants may have. This is an issue that existed prior to the COVID-19 crisis, but the public health crisis has made addressing it more urgent. PIAC would support National Cabinet developing a national framework for tenancy legislation to work towards ending 'no-grounds' evictions across all jurisdictions.

Recommendation 6 – Rapid re-housing framework

Work with States and territories to develop a 'rapid re-housing' framework to re-house people experiencing homelessness as soon as possible during and after the Covid-19 health crisis.

Recommendation 7 – Needs assessment framework

Work with States and territories to develop a needs assessment framework as the basis for provision of services, rather than designing services for particular cohorts or geographical areas.

Recommendation 8 – National framework towards ending ‘no-grounds’ evictions

Develop a national framework for tenancy legislation to work towards ending ‘no-grounds’ evictions nationally.

3.2.2 No return to poverty traps: Reforming our social security system

The Covid-19 health crisis is an opportunity to reform the social security system to ensure it meets its objective of providing every Australian with a minimum standard of living. Levels of social security payments were woefully inadequate before the COVID-19 crisis. As shown in the 2020 *Poverty in Australia* report,¹² and recognised by the Commonwealth inquiry into the adequacy of Newstart,¹³ they contributed to entrenched poverty and disadvantage by acting as ‘poverty traps’ in many circumstances. People had to choose between housing and meeting their other needs (such as food and transport) adequately. The *Anglicare Affordability Snapshot*¹⁴ has found that with the new levels of payments, there are now over 1,000 properties affordable to a single person on JobSeeker. This would decrease to nine properties should we go back to the previous level of payments. In Sydney, it would go from 345 affordable dwellings to nil.¹⁵ PIAC strongly supports the position of the Australian Council of Social Services (ACOSS) that there must be a permanent increase to JobSeeker and related allowances beyond the temporary coronavirus payment. These payments should be sufficient to prevent recipients from falling into poverty. The exact amount should be determined after consultation with the community services sector, indexed on an adequate measure of the cost of living rather than only Consumer Price Index, and should represent an increase of at least \$95 dollars a fortnight, as was recommended by ACOSS prior to the COVID-19 response.

In many cases, including for HPLS clients, mutual obligation requirements compound hardship and can act as a barrier for someone seeking employment or become ‘job-ready’. Activity requirements should be reviewed so they are not unrealistic and punitive. Suspension of payments due to failure of comply with mutual obligations requirements should only occur after a substantive period of time, allowing recipients to address the issue with Centrelink, including review of decisions, before payments are suspended. Critically, it should not place individuals at severe risk of homelessness. This could be addressed by Centrelink paying rent directly to social housing landlords for example, while the remainder of the payment is suspended while the recipient addresses issues with its mutual obligations.

The JobKeeper wage subsidy is an effective temporary scheme to keep businesses afloat and avoid individual quickly facing severe financial hardship and being at risk of homelessness due to a rapid decline in activity prompted by public health concerns. We support the scheme, but note there are issues with a number of cohorts not being able to access JobKeeper. There also needs to be a redesign of support packages such as the JobKeeper scheme and the COVID-19 supplement to be provided on the basis of need, rather than the basis of certain criteria. Casual workers of less than 12 months and migrant workers should be able to access the scheme.

We also have concerns about the risk of ‘delayed redundancies’ and potential massive job losses if the scheme was to be ended brutally. It would also affect its economic demand support function. JobKeeper should be progressively phased out as the economy recovers. There also

¹² Davidson, P., Saunders, P., Bradbury, B. and Wong, M. (2020), *Poverty in Australia 2020: Part 1, Overview*. ACOSS/UNSW Poverty and Inequality Partnership Report No. 3, Sydney: ACOSS.

¹³ Senate Standing Committees on Community Affairs (2020) *Adequacy of Newstart and related payments and alternative mechanisms to determine the level of income support payments in Australia*, Commonwealth of Australia 2020.

¹⁴ Anglicare Australia (2020) *Rental Affordability Snapshot 2020*. Available [here](#).

¹⁵ Ibid.

needs to be framework developed for national standards of trauma-informed practice, to ensure than people are able to engage sustainably in services and supports and that this experience does not traumatise them further.

Recommendation 9 – Increases in payments to avoid poverty

Increase the level of JobSeeker and related allowances permanently so recipients do not live in poverty, and develop a review mechanism with input from an independent expert commission.

Recommendation 10 – Review mutual obligations

Review mutual obligations requirements to make them realistic and ensure they do not unnecessary place social security recipients at risk of homelessness. Implement mechanisms to ensure rent payments are still made when payments are suspended due to failure to comply with mutual obligation requirements.

Recommendation 11 – Review JobKeeper

Review and amend the JobKeeper scheme in order to reduce the number of people excluded from the scheme.

Recommendation 12 – Phase out JobKeeper

Create a plan to progressively phase out JobKeeper rather than terminate the scheme abruptly.

Recommendation 13 – Eligibility for income support based on need

Determine eligibility for income support via an assessment of need, rather than a list of arbitrary criteria.

Recommendation 14 – Trauma-informed practice framework

Development of national framework for standards of trauma informed practice within both state and commonwealth organisations.

informed practice within both state and commonwealth organisations.

3.2.3 Building for recovery: A national plan to build healthy, affordable, climate-safe homes

Government driven stimulus will be necessary to alleviate the impact of a severe economic recession. In order to have the greatest impact, programs should be delivered rapidly, in a targeted and effective manner. Investment at scale in social housing would deliver an impressive stimulus to the economy and confer long term benefits. There is a severe national shortage of social housing that must be addressed to end homelessness and housing stress. Building social housing is a cost-effective way to deliver jobs, boosts to incomes, and improve the lives of low income households. The scheme would also drive employment: direct and indirect jobs would be created in both the short and long term, while creating income producing assets for government. In the current context of historically low interest rates, slowing construction and activity in the property market, it can be done at low cost to government and great support to the construction industry, which contributes 6% of Australian jobs.

PIAC strongly supports the development of a national plan to build social housing at scale, starting with at least 30,000 public and community housing dwellings over the next three years.

This is in line with ACOSS recommendations for *Post Covid-19 Economic Recovery*¹⁶ and the call of housing and homelessness peak bodies, National Shelter, CHIA, Homelessness Australia and Everybody's Home for a Social Housing Acceleration and Renovation Program.¹⁷

The faster projects can be delivered, the greater their impact on economic recovery. PIAC strongly supports the National Low Income Energy Productivity Program (NLEPP) designed by ACOSS to upgrade existing dwellings to healthy, affordable homes. Building on the joint statement for Healthy Affordable homes that PIAC was part of,¹⁸ we strongly support the measures of the NLEPP package:

- Energy efficiency upgrades and solar PV installations for social housing, financed jointly by federal and state governments.
- Incentives for upgrades for low income home owners
- Incentives for landlords to upgrade inefficient rental properties
- Subsidies for low income households to replace inefficient appliances

Recommendation 15 – Social housing-led recovery

Develop a social housing led recovery strategy, with input from national housing and homelessness peak bodies, to deliver 30,000 social housing dwellings over the next three years.

3.2.4 Jobs to end homelessness permanently: adequate funding for specialist homelessness services (SHS)

Assertive outreach programs can provide effective support to house people who are rough sleeping, but they need to be sufficiently resourced to provide adequate long term support. It is likely that demand for specialist homelessness services will increase across the country in the following months and years, but the sector is already at or over capacity. PIAC would support additional funding to what is currently planned under the NHHA for assertive outreach services and the 'wrap-around' services component of 'housing-first' programs.

From HPLS experience, a significant number of people experiencing homelessness will need support to maintain their tenancy, sometimes for a significant amount of time after they have secured housing. Support services that assist people in maintaining their tenancies should be included in funding for specialist homelessness services.

Recommendation 16 – Fund 'wrap-around' services

Provide additional funding to SHS for 'wrap around' support services including assistance to maintain tenancy for vulnerable people, through the NHHA or another funding mechanism.

¹⁶ Australian Council of Social Services (2020) *Post Covid-19 Economic Recovery Briefing*, accessible [here](#).

¹⁷ Community Housing Industry Association, Homelessness Australia, National Shelter, Everybody's Home (2020) *'Building the Recovery: Investment in social housing will create jobs and improve social outcomes during the pandemic'*, Media release, accessible [here](#).

See also Community Housing Industry Association, Homelessness Australia, National Shelter, Everybody's Home (2020) *Social Housing Acceleration and Renovation Program (SHARP)*, full briefing note accessible [here](#).

¹⁸ ACOSS, PIAC et al. (61 community and supporting organisations) (2019) *All Australians deserve a healthy, safe, affordable home: Community organisations call for a national strategy for low energy homes*, accessible [here](#).