Consultation on the draft New South Wales Homelessness Strategy 2025-2035

February 2025

About The Salvation Army

The Salvation Army is an international Christian movement with a presence in more than 130 countries. Operating in Australia since 1880, The Salvation Army is one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion.

The Salvation Army Australia provides more than 1,000 social programs and activities through networks of social support services, community centres and churches across the country. Programs include:

- Financial counselling, financial literacy and microfinance
- Emergency relief and related services
- Homelessness services
- Youth services
- Family and domestic violence services
- Alcohol, drugs and other addictions
- Chaplaincy
- Emergency and disaster response
- Aged care
- Employment services

As a mission-driven organisation, The Salvation Army seeks to reduce social disadvantage and create a fair and harmonious society through holistic and person-centred approaches that reflect our mission to share the love of Jesus by:

- Caring for people
- Creating faith pathways
- Building healthy communities
- Working for justice

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

Further information about The Salvation Army can be accessed at:
<https://www.salvationarmy.org.au/>

Table of contents

About The Salvation Army ..... **ii**

Our commitment to inclusion ..... **iv**

Executive summary ..... **v**

Summary of recommendations ..... **vi**

1 The Strategy **14**

An integrated approach *14*

2 Tailoring of approaches for high-risk groups **18**

Young people *18*

Aboriginal and Torres Strait Islander people *19*

Family and domestic violence *20*

3 Risks and opportunities **23**

Opportunities *23*

Risks *25*

4 Evaluation and outcomes measures **29**

Homelessness is rare *30*

Homelessness is brief *31*

Homelessness is not repeated *33*

5 Conclusion **35**

Our commitment to inclusion

The Salvation Army Australia acknowledges the Traditional Owners of the land on which we meet and work and pay our respect to Elders, past, present and future.

We value and include people of all cultures, languages, abilities, sexual orientations, gender identities, gender expressions and intersex status. We are committed to providing programs that are fully inclusive. We are committed to the safety and wellbeing of people of all ages, particularly children. Our values are:

- Integrity
- Compassion
- Respect
- Diversity
- Collaboration

The Salvation Army is a worldwide movement known for its acceptance and unconditional love for all people. We love unconditionally, because God first loved us. The Bible says, “God so loves the world” (John 3:16, RGT). As both a church and charity, we believe all people are loved by God and are worthy of having their needs met. Everyone is welcome to find love, hope, and acceptance at The Salvation Army.

The Salvation Army Australia Territory wishes to acknowledge that members of the LGBTIQA+ community have experienced hurt and exclusion because of mixed comments and responses made in the past. The Salvation Army is committed to inclusive practice that recognises and values diversity. We are ensuring our services affirm the right to equality, fairness, and decency for all LGBTIQA+ people, rectifying all forms of discriminatory practice throughout the organisation.

We seek to partner with LGBTIQA+ people and allies to work with us to build an inclusive, accessible, and culturally safe environment in every aspect of Salvation Army organisation and services. Everyone has a right to feel safe and respected.

Learn more about our commitment to inclusion: <**salvationarmy.org.au/about-us**>

Executive summary

The Salvation Army welcomes the opportunity to provide this submission to the New South Wales (NSW) Government's Homes NSW in relation to the Consultation on the draft NSW Homelessness Strategy 2025-2035 (the Strategy).

For over 140 years, The Salvation Army's services have supported individuals, families and communities experiencing hardship and disadvantage. These experiences include, but are not limited to, responding to poverty and financial hardship, homelessness, family and domestic violence, and alcohol and other drug use.

Our service delivery has highlighted that, to be effective, the way responses are provided must consider the unique experiences and needs of different groups and individuals in the community. This includes ensuring that the resources are available when and where they are needed to respond to identified needs.

Within a context of record investment by the NSW Government in new social and affordable housing, The Salvation Army maintains that the increased rolling investment in this critical infrastructure should be the overwhelming priority of the Strategy and other efforts by the NSW Government. The availability of accessible, affordable housing must serve as a precursor to initiatives that work towards ensuring homelessness in NSW is rare, brief and not repeated.

In this submission, The Salvation Army focuses on:

- Key directions of the Strategy;
- Tailoring of approaches for young people, people who have experienced family and domestic violence and Aboriginal and Torres Strait Islander people as high-risk groups;
- Risks and opportunities that may determine the ultimate success of failure of the Strategy; and
- Identification of possible evaluation and outcome measures.

The Salvation Army has made **32** recommendations for Homes NSW to consider. A summary of these recommendations follows.

Summary of recommendations

Recommendation 1

1.10 The Salvation Army recommends that the NSW Government supports and strengthens the following key advocacy asks of the Commonwealth:

- *Develop a National Strategy that responds to the structural drivers of housing affordability, poverty and homelessness. It should drive efforts that address income adequacy including increases to income support payments and supplements to ensure all Australians can live with dignity.*
- *Drive a review of Commonwealth Rent Assistance that assesses all aspects of the design of the payment with the aim of improving the adequacy, fairness, and effectiveness of the measure.*
- *The National Plan provides the context to deliver deep and comprehensive investment in social housing to arrest the current housing affordability and homelessness trajectory. The delivery of social housing should be commensurate with identified need (including waitlists) with ambitious state and territory targets identified in the National Plan (or its work plans).*

Recommendation 2

1.12 The Salvation Army recommends that the NSW Government develops a joined-up system that is person-centred and elevates prevention to make responding to homelessness everybody's business.

Recommendation 3

1.17 The Salvation Army recommends that the NSW Government work towards a homelessness service system that prioritises a model where appropriate investment will enhance the provision of effective preventative measures. Such a service system should:

- *Ensure the ready availability of a commensurate range of quality, accessible and appropriate housing types across NSW.*
- *Expand the availability of social and affordable housing.*
- *Deliver wrap-around support that ensures tenancies are maintained and community members are diverted from homelessness.*

Recommendation 4

1.21 The Salvation Army recommends that the NSW Government use each guiding principle as a lens through which every action, reform and service delivery activity under the Strategy is informed.

Recommendation 5

1.25 The Salvation Army recommends that the NSW Government pursue the three identified focus areas, which would see homelessness being rare, brief and not repeated. Rolling Action Plans should provide the detail for how each of the these and their associated outcomes will be achieved, by whom and by when.

Recommendation 6

2.3 The Salvation Army recommends that the NSW Government elevates responses that will better meet the needs of young people, people who have experienced family and domestic violence and Aboriginal and Torres Strait Islander people.

Recommendation 7

2.8 The Salvation Army recommends that the NSW Government develops a dedicated children and youth housing and homelessness response that would consider:

- *Programs of subsidised housing tenancies and support that meet the unique needs of each young person and are flexible enough to support longer-term tenancies and the evolving needs and circumstances of young people.*
- *A mix of housing and tenure types - from crisis through to long-term social housing. This should include addressing the gap of transitional accommodation provided with appropriate support.*
- *The provision of appropriate education and training for at-risk young people combined with tailored, coordinated, wrap-around support across housing, youth justice, out-of-home care, alcohol and other drug and mental health services. This should include better services integration and stepped models of care.*
- *Housing responses that keep families together and are responsive to the special vulnerability of children.*
- *Better data collection to capture the prevalence and experience of young people who are at risk of or experiencing homelessness.*
- *Advocacy directed to the Commonwealth Government calling for a review of income support regulations that presume that a person is dependent on their family until age 25.*

Recommendation 8

2.11 The Salvation Army recommends that the NSW Government ensure that the Strategy and other measures affecting Aboriginal and Torres Strait Islander people in NSW consider:

- *The significant overrepresentation of Aboriginal and Torres Strait Islander people experiencing homelessness, overcrowding and housing stress.*
- *Acknowledging the differing challenges and needs across metropolitan, regional, remote and very remote communities.*
- *Generational trauma and displacement arising from spiritual homelessness, discrimination and ongoing effects of the Stolen Generation.*
- *Cultural, social, and economic factors such as kinship responsibilities, extended families, health and wellbeing challenges, and economic disadvantage.*
- *The need for both broad and localised cultural awareness that considers language, traditional law and connection to land.*
- *Progress towards cultural inclusion and cultural safety at all levels of engagement.*
- *The formation, re-building and maintenance of relationships between Aboriginal and Torres Strait Islander organisations, governments and other organisations that may turn into partnerships that enhance service delivery and capacity.*
- *Building the capacity of Aboriginal and Torres Strait Islander people and organisations.*

Recommendation 9

2.16 The Salvation Army recommends that the NSW Government elevate responses to family and domestic violence and issues of gender inequality that drive family and domestic violence through:

- *Increasing investment in frontline family and domestic violence services to ensure they are able to accommodate the safety needs of victim-survivors. This should include crisis case management and housing support responses to enable safe transition from refuge into the community.*
- *Increasing the stock of crisis and transitional accommodation - particularly in regions where there are no or limited crisis options. Domestic Violence NSW suggest that transitional accommodation should be available for periods of up to 3 years.*
- *Increasing the stock of crisis and transitional accommodation - particularly in regions where there are no or limited crisis options. Domestic Violence NSW suggest that transitional accommodation should be available for periods of up to 3 years.*
- *Recognise the emerging needs of older women through provision of specialist older person's housing information and support services that comprises both an early intervention and crisis response.*
- *Addressing bottlenecks in crisis and transitional accommodation due to a lack of exit pathways.*
- *Enhancing housing products such as Rent Choice Start Safely by providing incentives and program education for real estate agents and landlords, and bolstering wrap-around supports. The review of subsidy caps and how affordability is defined should ensure they are realistic and align with the actual cost of the current rental market.*
- *Enhancing housing products such as Rent Choice Start Safely by providing incentives and program education for real estate agents and landlords, and bolstering wrap-around supports. The review of subsidy caps and how affordability is defined by programs should ensure they are realistic and align with the actual cost of the current rental market.*
- *Increasing investment in services supporting victim-survivors to remain safely in their home where appropriate.*
- *Investing in specialist family and domestic violence responses for children as victim-survivors in their own right, including funding refuges to include specialist children's workers.*
- *Focussing on prevention, early intervention and community education including education around financial literacy, financial abuse and coercive control to empower victim-survivors, particularly those in vulnerable cohorts, to seek help.*
- *Taking active measures that address gender inequality and the role it plays in family and domestic violence and homelessness.*

Recommendation 10

3.5 The Salvation Army recommends that the NSW Government addresses the significant shortfall in social and affordable housing as the greatest risk and opportunity for the success of the Strategy.

Recommendation 11

3.7 The Salvation Army recommends that the NSW Government alongside joined up, preventative measures, focus on early intervention initiatives that may see the number of people becoming homeless reduced and improve long-term housing outcomes. These outcomes would be consistent with the focus areas that would see homelessness as rare, brief and not repeated.

Recommendation 12

3.8 The Salvation Army recommends that the NSW Government grows the community housing sector to create greater leveraging opportunities and enhance sector capacity to expand its housing portfolios. In the shorter term, this should include increasing the stock of transitional housing and emergency accommodation. This could go some way to addressing the chronic shortfall in exit points, where there are bottlenecks throughout the homelessness service system.

Recommendation 13

3.9 The Salvation Army recommends that the NSW Government foster better coordination between government agencies, non-governmental organisations (NGOs), and local communities, to promote more tailored solutions for those experiencing homelessness. Collaboration and engagement in the development of Action Plans would also see the improved integration of housing with support services like healthcare, education, and employment assistance, which can support individuals to reintegrate into communities and maintain stable housing.

Recommendation 14

3.11 The Salvation Army recommends that the NSW Government address the specific needs of other homeless groups, such as older people, veterans, LGBTIQ+ people, people exiting institutions, people from culturally and diverse backgrounds people on low incomes and others at risk or experiencing homelessness. Issues of intersectionality also need to be considered.

Recommendation 15

3.13 The Salvation Army recommends that the NSW Government increases focus on homelessness more broadly to generate improved public awareness and support for policies aimed at reducing homelessness.

Recommendation 16

3.17 The Salvation Army recommends that the NSW Government ensure adequate and commensurate funding and resources are deployed to implement the Strategy.

Recommendation 17

3.18 The Salvation Army recommends that the NSW Government ensure supply of social and affordable housing meets demand for those at risk or experiencing homelessness, including reducing the number of people experiencing housing stress and eviction.

Recommendation 18

3.20 The Salvation Army recommends that the NSW Government consider strategy implementation from the differing starting points and stakeholder capacities to engage. Different communities may need approaches that acknowledge their unique circumstances.

Recommendation 19

3.23 The Salvation Army recommends that the NSW Government seeks to engage bipartisan and cross-party support to better ensure:

- *Continuity through election cycles of the priority accorded to the Strategy and the resources required to end homelessness.*
- *Shared responsibility and buy-in across government, where all parties are invested in the outcomes.*
- *Political consensus that will build community awareness and trust in government.*

Recommendation 20

3.24 The Salvation Army recommends that the NSW Government, alongside increasing availability of social and affordable housing, ensures and improves availability of wrap-around services to support people to meet their needs and retain tenancies. This includes addressing the service gap that often leads to individuals being unable to maintain their home ownership or rental housing because they are considered ineligible for support due to income limits. Improved community education about where to get support and income limits would also go some way addressing the needs of this group.

Recommendation 21

3.27 The Salvation Army recommends that the NSW Government take account of housing and population modelling, research on housing trajectories and transparent housing and homelessness responses to population growth. The changing demographic composition over time should also be considered.

Recommendation 22

3.29 The Salvation Army recommends that the NSW Government consider the following development and design issues when planning new crisis refuges, transitional housing or new social housing:

- *Climate and environmental appropriateness, including energy efficiency and natural disaster resilience.*
- *Housing and system design that acknowledges that while it may be individuals that first enter the system, that these people often go on to become couples and families over time.*
- *Older people should be able to age in-place*
- *Housing must be tailored to local conditions and be future focused to ensure the longevity of housing solutions*
- *Access to green spaces that takes account of the large proportion of community members that have pets.*

Recommendation 23

4.5 The Salvation Army recommends that the NSW Government consult with experts to determine the most appropriate targets that are transparent and reportable across each of the actions and initiatives that the Strategy seeks to implement. These should be detailed in rolling Action Plans.

Recommendation 24

4.6 The Salvation Army recommends that the NSW Government consider the following indicators for preventing homelessness and making it rare:

- *Percentage and number of people first becoming homeless, where a reduction indicates the prevention strategy is working.*
- *Number of quality, affordable housing units.*
- *Number of complaints about building quality.*
- *Ratio of median house price to household income in NSW.*
- *Percentage of households in housing stress (paying 30 per cent or more of their household income on housing).*
- *Percentage of people in private rentals (or receiving Centrelink support) that receive rental subsidies or products.*
- *Percentage of people being evicted as a proportion of the overall proportion, private rental market, and due to mortgage default.*
- *Percentage of people leaving government services exiting into appropriate housing.*

Recommendation 25

4.7 The Salvation Army recommends that the NSW Government consider the following measures for people at risk of or experiencing homelessness:

- *Monitor for any increase in the number of referrals or other requests made to homelessness and relevant service providers. This includes monitoring the diversity of referral sources.*
- *Percentage of people being turned away from relevant service providers.*
- *Average wait list numbers and duration at homelessness services and other services that support those at risk of or experiencing homelessness.*

Recommendation 26

4.8 The Salvation Army recommends that the NSW Government increase public awareness of where to seek housing-related advice and support for people experiencing hardship or at risk of homelessness. This should be coupled with a reduction of stigma regarding those experiencing homelessness and financial hardship. Possible measures could include:

- *Sentiment analysis of NSW people's perceptions about homelessness and their actions if they or someone they know are at risk or have become homeless.*
- *Number of people accessing information and service hubs (virtual and in-person), and feedback from users.*
- *Measuring any changes in the circumstances and presenting issues of new clients and those at risk or experiencing homelessness.*
- *Monitoring diversity of referral sources, such as referrals being made by the public, family and friends, self-referrals, or untypical sources.*

Recommendation 27

4.9 The Salvation Army recommends that the NSW Government develop indicators to monitor progress on how and to what extent people's needs are quickly identified when they are facing homelessness, and whether they are referred to the appropriate support. Possible indicators include:

- *Percentage of people accessing Specialist Homelessness Services relative to the estimated number of people experiencing homelessness in NSW.*
- *Satisfaction monitoring measuring how satisfied clients are with the referral process and the services they receive.*
- *Staff feedback on the availability of appropriate referrals and supports at the local level.*

Recommendation 28

4.10 The Salvation Army recommends that the NSW Government introduce indicators to determine whether people are able to access safe crisis accommodation with appropriate support when they need it. Indicators include:

- *Occupancy rates measuring the capacity of crisis accommodation facilities at any given time.*
- *The average time it takes for a person to be placed in crisis accommodation after requesting it.*
- *Reporting mechanisms that measure the frequency of safety or security incidents within crisis accommodations.*
- *Client satisfaction and feedback, which collects data from clients about their experience and satisfaction with the crisis accommodation and support received.*

Recommendation 29

4.11 The Salvation Army recommends that the NSW Government introduce indicators to determine whether people are supported out of homelessness into longer-term housing with tailored support. These include:

- *Rate of exit to stable housing, where the proportion of people who successfully move from crisis accommodation to stable, permanent housing is measured.*
- *Client satisfaction and feedback data about their experiences and satisfaction with their long-term housing and wrap-around supports.*

Recommendation 30

4.12 The Salvation Army recommends that the NSW Government introduce indicators that help determine whether people with complex needs can access comprehensive, longer-term support so they do not experience repeat homelessness. These may include:

- *The percentage of individuals who successfully transition from homelessness to stable housing with continued support services.*
- *The percentage of individuals with complex needs who achieve personal goals related to housing stability, education, employment, and health.*
- *Measures for the development and implementation of tailored support plans for individuals, accounting for trauma, poor health, mental illness, and substance use.*
- *Duration for which individuals, especially children and young people, maintain stable housing after receiving tailored support.*

Recommendation 31

4.13 The Salvation Army recommends that the NSW Government introduce indicators to determine whether people have strong connections to their community that protect against repeat homelessness. These may include:

- *Participation rates in community activities.*
- *Client self-reported increases in the number of meaningful connections with family, friends, and community members after participating in community development initiatives.*
- *The percentage of individuals who experience a reduction in repeat homelessness due to strengthened community ties.*

Recommendation 32

4.15 The Salvation Army recommends that the NSW Government introduce indicators to determine whether people have access to housing that meets their changing needs across their lifespan. Indicators may include:

- *Number of joint initiatives that lead to integrated support.*
- *Number of mainstream service providers receiving cultural safety training aimed at supporting Aboriginal and Torres Strait Islander people and people form culturally and linguistically diverse backgrounds.*
- *Aboriginal and Torres Strait Islander and culturally and linguistically diverse client perceptions and feelings of cultural safety and satisfaction when accessing mainstream services.*
- *Quality assurance audits to ensure homes meet established safety and quality benchmarks.*

1 The Strategy

1.1 As outlined in the introduction to the Strategy, homelessness in NSW has significantly worsened in the last 10 years and continues to do so. This has led to the devastated lives of community members, and a service system stretched well beyond its capacity to effectively respond.

1.2 This crisis has been in the making for several decades, with housing affordability being raised by people using our services and cited by our frontline staff as being the main factor for increasing homelessness in NSW.

1.3 Unfortunately, securing affordable housing is not just an imperative for people already experiencing homelessness or at risk of homelessness, but is a serious challenge facing individuals, families and communities across the housing continuum. The unaffordability and unavailability of housing necessarily impacts people more as their level of income adequacy declines. This is well ventilated in reports such as those prepared by Anglicare on rental affordability.[1]

1.4 We are very pleased that the NSW Government itself now acknowledges the breadth and depth of the crisis, and is directly engaging in the language, research findings, service delivery experience and lived experience to develop this strategy and to work towards ending homelessness.

1.5 With the right investment (that is commensurate with identified need), system reform, and supporting plans that give detail and accountability to the aspirations and guiding principles of the Strategy, The Salvation Army agrees that homelessness is a solvable problem.

An integrated approach

1.6 An integrated approach to ending homelessness will require the following.

Shared roles of governments

1.7 From the outset, The Salvation Army acknowledges that the structural drivers of poverty and homelessness do not necessarily reside with any one level of government, but that each level will have particular levers at their disposal.

1.8 Apart from shared responsibility in developing solutions to problems in markets and society within the capacity of their respective powers, there are important advocacy, negotiation and leveraging opportunities at the hands of state governments in influencing those levers that are at the hands of the Commonwealth Government.

[1] Anglicare Australia. (2024) *Rental Affordability Snapshot. National Report. Fifteenth Edition*. https://www.anglicare.asn.au/wp-content/uploads/2024/04/Rental-Affordability-Snapshot-National-Report.pdf.

1.9 Specifically, through written submissions and meetings with Commonwealth ministers, parliamentarians and other officials, The Salvation Army has long-held positions that call on the Commonwealth to take actions within its power to respond to poverty and homelessness.

Recommendation 1

1.10 The Salvation Army recommends that the NSW Government supports and strengthens the following key advocacy asks of the Commonwealth:

- **Develop a National Strategy that responds to the structural drivers of housing affordability, poverty and homelessness. It should drive efforts that address income adequacy including increases to income support payments and supplements to ensure all Australians can live with dignity.**
- **Drive a review of Commonwealth Rent Assistance that assesses all aspects of the design of the payment with the aim of improving the adequacy, fairness, and effectiveness of the measure.**
- **The National Plan provides the context to deliver deep and comprehensive investment in social housing to arrest the current housing affordability and homelessness trajectory. The delivery of social housing should be commensurate with identified need (including waitlists) with ambitious state and territory targets identified in the National Plan (or its work plans).**

Joining the dots

1.10 The Strategy draws on a wide range of evidence and acknowledges the intersections with the many state and national priorities, policies and actions across government portfolios that connect with homelessness. It also highlights the roles of other partners including local government, non-government services, Aboriginal Regional Alliances and community.

1.11 While there is much work to do in reforming the way these strategies, services and organisations all work together, we are supportive of a joined-up system that is person-centred and elevates prevention to make responding to homelessness everybody's business.

Recommendation 2

1.12 The Salvation Army recommends that the NSW Government develops a joined-up system that is person-centred and elevates prevention to make responding to homelessness everybody's business.

Homelessness is rare, brief and not repeated

1.13 Consistent with the evidence, principles and conceptual paradigms that have informed development of the Strategy, The Salvation Army would welcome a shift away from crisis-driven homelessness models. This system currently prioritises resources and practice toward the person or family when they have already become homeless. We support moving towards a model where appropriate investment will enhance the provision of effective preventative measures.

1.14 Critical to successfully deploying this paradigm shift will be the ready availability of a commensurate range of quality, accessible and appropriate housing types across NSW.

1.15 Given the high vulnerability, deep disadvantage, poor health, mental ill-health and wellbeing, together with the extreme material poverty experienced by many of the community members that The Salvation Army supports, there is an urgent and ongoing need for the expansion of social and affordable housing.

1.16 Also consistent with the identified needs of vulnerable individuals and households is the provision of appropriate wrap-around support that ensures tenancies are maintained and community members are supported to maximise opportunities for engagement in social life education and training, and to access health care and employment opportunities.

Recommendation 3

1.17 The Salvation Army recommends that the NSW Government work towards a homelessness service system that prioritises a model where appropriate investment will enhance the provision of effective preventative measures. Such a service system should:

- **Ensure the ready availability of a commensurate range of quality, accessible and appropriate housing types across NSW.**
- **Expand the availability of social and affordable housing.**
- **Deliver wrap-around support that ensures tenancies are maintained and community members are diverted from homelessness.**

Guiding principles

1.18 The Salvation Army welcomes the guiding principles that should underpin all aspects of the Strategy, commissioning, resource allocation and service delivery. These are principles for which The Salvation Army has long advocated and are either explicitly expressed or implied in our own Models of Care, which have been individually developed for each of our national homelessness, youth and family and domestic violence streams.

1.19 For the NSW Strategy, we do not believe that any one principle should be privileged over another, but each and all should act as a lens through which every action, reform and service delivery activity should be informed.

1.20 While prefaced as 'aspirational' from the outset, the proof of these will only be found in the new outputs and outcomes that are delivered through the development and implementation of rolling Action Plans.

Recommendation 4

1.21 The Salvation Army recommends that the NSW Government use each guiding principle as a lens through which every action, reform and service delivery activity under the Strategy is informed.

Strategy focus areas

1.22 Along with colleagues across the homelessness network, The Salvation Army welcomes the three identified Strategy focus areas, which would see homelessness being rare, brief and not repeated.

1.23 Attainment of the proposed outcomes associated with each of these, through the delivery of the proposed undertakings to do so, would provide very good chances of ending homelessness for good.

1.24 The development and implementation of rolling Action Plans should drive the refinement and provide the detail for how each of the focus areas and associated outcomes will be achieved, by whom and by when.

Recommendation 5

1.25 The Salvation Army recommends that the NSW Government pursue the three identified focus areas, which would see homelessness being rare, brief and not repeated. Rolling Action Plans should provide the detail for how each of the these and their associated outcomes will be achieved, by whom and by when.

2 Tailoring of approaches for high-risk groups

2.1 While perhaps a matter for consideration in developing the rolling Action Plans, The Salvation Army calls for the elevation of responses that will better meet the needs of groups that data and experience have shown to be at greater risk of homelessness. These are young people, people who have experienced family and domestic violence and Aboriginal and Torres Strait Islander people.

2.2 Noting that there are many others at-risk, the focus on solutions for the aforementioned groups should not be at the expense of diminished attention to other groups and individuals.

Recommendation 6

2.3 The Salvation Army recommends that the NSW Government elevates responses that will better meet the needs of young people, people who have experienced family and domestic violence and Aboriginal and Torres Strait Islander people.

Young people

2.4 The Salvation Army recommends that the Strategy commits to a dedicated children and youth housing and homelessness response. This is in acknowledgement of the unique and multidimensional needs of children and young people that cannot be addressed through a generic Strategy and a homelessness service system geared towards adults. A dedicated children and youth housing and homelessness response would strengthen the connection between housing and support as means to end homelessness.

2.5 We commend the NSW Government for its record expenditure on housing but observe there is no commensurate commitment for specialist homelessness and other support services. This means that the most complex will remain homeless or at great risk of losing their tenancies. For many of the most severely disadvantaged young people receiving services and support from The Salvation Army, our experience is that young people will not remain housed without tailored, ongoing support.

2.6 In many instances, including young people with severe mental ill-health, we also observe that the need for support can be long-term (years - not weeks or months). It also needs to be tailored, flexible and tapered such as the stepped care models sometimes available in alcohol and other drug and mental health services.

2.7 As with other homeless and at-risk groups, young people need a mix of housing - from crisis through to long-term social housing. Currently, most resources are directed to either very short-term crisis accommodation, or to social housing with little to no support. We still identify the need for resources to be directed ‘in the middle’, including transitional accommodation with appropriate support.

Recommendation 7

2.8 The Salvation Army recommends that the NSW Government develops a dedicated children and youth housing and homelessness response that would consider:

- **Programs of subsidised housing tenancies and support that meet the unique needs of each young person and are flexible enough to support longer-term tenancies and the evolving needs and circumstances of young people.**
- **A mix of housing and tenure types - from crisis through to long-term social housing. This should include addressing the gap of transitional accommodation provided with appropriate support.**
- **The provision of appropriate education and training for at-risk young people combined with tailored, coordinated, wrap-around support across housing, youth justice, out-of-home care, alcohol and other drug and mental health services. This should include better services integration and stepped models of care.**
- **Housing responses that keep families together and are responsive to the special vulnerability of children.**
- **Better data collection to capture the prevalence and experience of young people who are at risk of or experiencing homelessness.**
- **Advocacy directed to the Commonwealth Government calling for a review of income support regulations that presume that a person is dependent on their family until age 25.**

Aboriginal and Torres Strait Islander people

2.9 The Salvation Army acknowledges that the overrepresentation of Aboriginal and Torres Strait Islander people experiencing or at risk of homelessness is well established, and sits alongside many other indicators and experiences of disadvantage.

2.10 We strongly support the inclusion of Aboriginal and Torres Strait Islander Peoples in developing, determining, and administering housing programs. Culturally appropriate Aboriginal and Torres Strait Islander housing solutions are vital for communities to ensure their specific needs are met and unique contexts considered.

Recommendation 8

2.11 The Salvation Army recommends that the NSW Government ensure that the Strategy and other measures affecting Aboriginal and Torres Strait Islander people in NSW consider:

- **The significant overrepresentation of Aboriginal and Torres Strait Islander people experiencing homelessness, overcrowding and housing stress.**
- **Acknowledging the differing challenges and needs across metropolitan, regional, remote and very remote communities.**
- **Generational trauma and displacement arising from spiritual homelessness, discrimination and ongoing effects of the Stolen Generation.**
- **Cultural, social, and economic factors such as kinship responsibilities, extended families, health and wellbeing challenges, and economic disadvantage.**
- **The need for both broad and localised cultural awareness that considers language, traditional law and connection to land.**
- **Progress towards cultural inclusion and cultural safety at all levels of engagement.**
- **The formation, re-building and maintenance of relationships between Aboriginal and Torres Strait Islander organisations, governments and other organisations that may turn into partnerships that enhance service delivery and capacity.**
- **Building the capacity of Aboriginal and Torres Strait Islander people and organisations.**

Family and domestic violence

2.12 Nationally, over a quarter of people who received support from specialist homelessness services identified family and domestic violence as the main reason for needing help, where 75 per cent identified as female and 48 per cent were living as a single parent with one or more children.[2] Summary data outlined in the Strategy indicates rates of people experiencing family and domestic violence have increased by 42 per cent in NSW.

2.13 Women are overrepresented in almost all the services that The Salvation Army provides. For example, recent research conducted by The Salvation Army has shown that 75 per cent of respondents who had sought support through our Doorways (emergency relief) services were women, in comparison to 25 per cent of respondents who were men.[3]

[2]Australian Institute of Health and Welfare (AIHW). (2024). *Specialist homelessness services annual report 2023-24*. https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-annual-report/contents/clients-services-and-outcomes.

[3] The Salvation Army. (2023). *At Breaking Point: The Red Shield Report June 2023.* https://www.salvationarmy.org.au/scribe/sites/auesalvos/files/RSA2023/RSA23_RSA_Research_Report_At_breaking_point_FINAL_(1).pdf.

2.14 We believe that failure to achieve gender equity has contributed to significant short- and long-term disadvantages for women across Australia. These disadvantages include, but are not limited to, increased risk of experiencing family and domestic violence, decreased ability to participate in the workforce, and increased risk of homelessness. These disadvantages further produce outcomes such as the superannuation gap, and older women becoming the fastest growing homelessness cohort in Australia.

2.15 In elevating responses to family and domestic violence, the recommendations that follow reflect the experience of The Salvation Army and align with priorities identified by Domestic Violence NSW in their submission to this inquiry.

Recommendation 9

2.16 The Salvation Army recommends that the NSW Government elevate responses to family and domestic violence and issues of gender inequality that drive family and domestic violence through:

- **Increasing investment in frontline family and domestic violence services to ensure they are able to accommodate the safety needs of victim-survivors. This should include crisis case management and housing support responses to enable safe transition from refuge into the community.**
- **Increasing the stock of crisis and transitional accommodation - particularly in regions where there are no or limited crisis options. Domestic Violence NSW suggest that transitional accommodation should be available for periods of up to 3 years.**
- **Increasing the stock of crisis and transitional accommodation - particularly in regions where there are no or limited crisis options. Domestic Violence NSW suggest that transitional accommodation should be available for periods of up to 3 years.**
- **Recognise the emerging needs of older women through provision of specialist older person's housing information and support services that comprises both an early intervention and crisis response.**
- **Addressing bottlenecks in crisis and transitional accommodation due to a lack of exit pathways.**
- **Enhancing housing products such as Rent Choice Start Safely by providing incentives and program education for real estate agents and landlords, and bolstering wrap-around supports. The review of subsidy caps and how affordability is defined should ensure they are realistic and align with the actual cost of the current rental market.**
- **Enhancing housing products such as Rent Choice Start Safely by providing incentives and program education for real estate agents and landlords, and bolstering wrap-around supports. The review of subsidy caps and how affordability is defined by programs should ensure they are realistic and align with the actual cost of the current rental market.**
- **Increasing investment in services supporting victim-survivors to remain safely in their home where appropriate.**

- **Investing in specialist family and domestic violence responses for children as victim-survivors in their own right, including funding refuges to include specialist children's workers.**
- **Focussing on prevention, early intervention and community education including education around financial literacy, financial abuse and coercive control to empower victim-survivors, particularly those in vulnerable cohorts, to seek help.**
- **Taking active measures that address gender inequality and the role it plays in family and domestic violence and homelessness.**

3 Risks and opportunities

3.1 The Strategy presents a range of risks and opportunities, which could impact its effectiveness and outcomes.

3.2 As outlined throughout this submission, The Salvation Army holds that the overwhelming issue at stake for NSW and the rest of Australia in ending homeless, is the availability of affordable housing. For the most part, housing ends homelessness.

3.3 The great and urgent need for more social housing, both in the immediate and long-term, represents the largest risk to the success of the Strategy should supply remain inadequate.

3.4 Together with the proposed systems reforms, focus areas, and guided by the principles outlined in the Strategy, the delivery of social and affordable housing that is commensurate with identified and projected need would represent the opportunity to lead the country in ending homelessness and the housing crisis at-large.

Recommendation 10

3.5 The Salvation Army recommends that the NSW Government addresses the significant shortfall in social and affordable housing as the greatest risk and opportunity for the success of the Strategy.

Opportunities

3.6 Notwithstanding the central challenge of building sufficient social and affordable housing, The Salvation Army has identified other opportunities that are foreshadowed by the Strategy. These are outlined as recommendations for consideration below.

Prevention and early intervention

Recommendation 11

3.7 The Salvation Army recommends that the NSW Government alongside joined up, preventative measures, focus on early intervention initiatives that may see the number of people becoming homeless reduced and improve long-term housing outcomes. These outcomes would be consistent with the focus areas that would see homelessness as rare, brief and not repeated.

Housing supply

Recommendation 12

3.8 The Salvation Army recommends that the NSW Government grows the community housing sector to create greater leveraging opportunities and enhance sector capacity to expand its housing portfolios. In the shorter term, this should include increasing the stock of transitional housing and emergency accommodation. This could go some way to addressing the chronic shortfall in exit points, where there are bottlenecks throughout the homelessness service system.

Collaboration

Recommendation 13

3.9 The Salvation Army recommends that the NSW Government foster better coordination between government agencies, non-governmental organisations (NGOs), and local communities, to promote more tailored solutions for those experiencing homelessness. Collaboration and engagement in the development of Action Plans would also see the improved integration of housing with support services like healthcare, education, and employment assistance, which can support individuals to reintegrate into communities and maintain stable housing.

Focus on at-risk groups

3.10 Alongside the elevation of responses for young people, people who have experienced family and domestic violence and Aboriginal and Torres Strait Islander people, the Strategy may address the specific needs of other homeless groups, such as older people, veterans, LGBTIQA+ people, people exiting institutions, people from culturally and diverse backgrounds, people on low incomes and others at risk or experiencing homelessness.

Recommendation 14

3.11 The Salvation Army recommends that the NSW Government address the specific needs of other homeless groups, such as older people, veterans, LGBTIQ+ people, people exiting institutions, people from culturally and diverse backgrounds people on low incomes and others at risk or experiencing homelessness. Issues of intersectionality also need to be considered.

Public Awareness

3.12 The increased focus on homelessness in general can generate improved public awareness and support for policies aimed at reducing homelessness. This could lead to better community engagement, support and stronger advocacy for systemic changes.

Recommendation 15

3.13 The Salvation Army recommends that the NSW Government increases focus on homelessness more broadly to generate improved public awareness and support for policies aimed at reducing homelessness.

Risks

Funding and resources

3.14 We acknowledge that the Strategy has been informed by extensive research, data, service delivery and lived experience, resulting in a very welcome, if not ambitious, approach to ending homelessness. Just as the funding and resources made available for more social and affordable housing will determine just how broadly and deeply homelessness can be addressed, so too will they determine how extensively and effectively the non-housing elements of the Strategy are deployed.

3.15 At the very heart of most all efforts to reduce and end homelessness, the NSW Government needs to work with stakeholders and ensure the supply of social and affordable housing meets demand for those at risk or experiencing homelessness. This includes reducing the number of people experiencing housing stress and eviction.

3.16 The effectiveness of the Strategy will be heavily dependent on adequate funding, where budget constraints could lead to delays, limitations in the scope of the Strategy, and ultimately the failure of the Strategy.

Recommendation 16

3.17 The Salvation Army recommends that the NSW Government ensure adequate and commensurate funding and resources are deployed to implement the Strategy.

Recommendation 17

3.18 The Salvation Army recommends that the NSW Government ensure supply of social and affordable housing meets demand for those at risk or experiencing homelessness, including reducing the number of people experiencing housing stress and eviction.

Implementation challenges

3.19 Measures as large and complex as the Strategy could face challenges in coordination and implementation, not only due to its scale, but the necessary involvement of the many stakeholders implicated in the Strategy.

Recommendation 18

3.20 The Salvation Army recommends that the NSW Government consider strategy implementation from the differing starting points and stakeholder capacities to engage. Different communities may need approaches that acknowledge their unique circumstances.

Long-term sustainability

3.21 While immediate responses are important, the Strategy must also focus on long-term sustainability.

3.22 As outlined previously in identifying the structural drivers of homelessness and the role of the Commonwealth, simply providing temporary housing solutions without addressing broader systemic issues such as poverty and income adequacy, discrimination, and unemployment, would likely result in the ongoing revolving door of homelessness.

Recommendation 19

3.23 The Salvation Army recommends that the NSW Government seeks to engage bipartisan and cross-party support to better ensure:

- **Continuity through election cycles of the priority accorded to the Strategy and the resources required to end homelessness.**
- **Shared responsibility and buy-in across government, where all parties are invested in the outcomes.**
- **Political consensus that will build community awareness and trust in government.**

Lack of adequate support services

Recommendation 20

3.24 The Salvation Army recommends that the NSW Government, alongside increasing availability of social and affordable housing, ensures and improves availability of wrap-around services to support people to meet their needs and retain tenancies. This includes addressing the service gap that often leads to individuals being unable to maintain their home ownership or rental housing because they are considered ineligible for support due to income limits. Improved community education about where to get support and income limits would also go some way addressing the needs of this group.

Population planning

3.25 It is unclear if the Strategy has considered anticipated population growth in NSW and how this may be distributed across the housing and homelessness continuum.

3.26 Data from the NSW Government shows that NSW's population is projected to reach 10.07 million people by 2041, which represents an average annual population growth rate of 1.1 per cent per year. In Greater Sydney alone, the population is projected to increase by 1.4 million people in 2041 and approximately a further 600,000 across the rest of NSW.[4]

Recommendation 21

3.27 The Salvation Army recommends that the NSW Government take account of housing and population modelling, research on housing trajectories and transparent housing and homelessness responses to population growth. The changing demographic composition over time should also be considered.

Development and design

3.28 Whether planning new crisis refuges, transitional housing or new social housing, and alongside the specialist services required to support community members, there are several development and design issues that should be considered in their execution.

[4] New South Wales Government Planning (Undated). *Key Findings: Population Projections*. https://www.planning.nsw.gov.au/data-and-insights/population-projections/key-findings.

Recommendation 22

3.29 The Salvation Army recommends that the NSW Government consider the following development and design issues when planning new crisis refuges, transitional housing or new social housing:

- **Climate and environmental appropriateness, including energy efficiency and natural disaster resilience.**
- **Housing and system design that acknowledges that while it may be individuals that first enter the system, that these people often go on to become couples and families over time.**
- **Older people should be able to age in-place**
- **Housing must be tailored to local conditions and be future focused to ensure the longevity of housing solutions**
- **Access to green spaces that takes account of the large proportion of community members that have pets.**

4 Evaluation and outcomes measures

4.1 The NSW Government's outcomes and impact framework, systems and tools should be agile to support innovation, continuous improvement and continuous learning.

4.2 Service providers need the ability to adjust their impact measurement and evaluation frameworks (including service feedback and outcomes indicators and tools) as they innovate and improve their services and models of care based on insights from these frameworks. This will ensure their outcomes and evaluation frameworks remain fit-for-purpose and evolve with their service delivery models.

4.3 We are currently not in a position to recommend specific targets. Instead, we offer suggestions for suitable indicators is a constructive first step, and we recommend that the NSW Government consult with experts to determine the most appropriate targets.

4.4 In the following recommendations, possible indicators are identified for the outcomes outlined in each of the three focus areas.

Recommendation 23

4.5 The Salvation Army recommends that the NSW Government consult with experts to determine the most appropriate targets that are transparent and reportable across each of the actions and initiatives that the Strategy seeks to implement. These should be detailed in rolling Action Plans.

Homelessness is rare

People can get and keep a safe and affordable home

Recommendation 24

4.6 The Salvation Army recommends that the NSW Government consider the following indicators for preventing homelessness and making it rare:

- **Percentage and number of people first becoming homeless, where a reduction indicates the prevention strategy is working.**
- **Number of quality, affordable housing units.**
- **Number of complaints about building quality.**
- **Ratio of median house price to household income in NSW.**
- **Percentage of households in housing stress (paying 30 per cent or more of their household income on housing).**
- **Percentage of people in private rentals (or receiving Centrelink support) that receive rental subsidies or products.**
- **Percentage of people being evicted as a proportion of the overall proportion, private rental market, and due to mortgage default.**
- **Percentage of people leaving government services exiting into appropriate housing.**

People at risk of homelessness are identified early and linked with the right supports

Recommendation 25

4.7 The Salvation Army recommends that the NSW Government consider the following measures for people at risk of or experiencing homelessness:

- **Monitor for any increase in the number of referrals or other requests made to homelessness and relevant service providers. This includes monitoring the diversity of referral sources.**
- **Percentage of people being turned away from relevant service providers.**
- **Average wait list numbers and duration at homelessness services and other services that support those at risk of or experiencing homelessness.**

People know where to get information and support to prevent homelessness

Recommendation 26

4.8 The Salvation Army recommends that the NSW Government increase public awareness of where to seek housing-related advice and support for people experiencing hardship or at risk of homelessness. This should be coupled with a reduction of stigma regarding those experiencing homelessness and financial hardship. Possible measures could include:

- **Sentiment analysis of NSW people's perceptions about homelessness and their actions if they or someone they know are at risk or have become homeless.**
- **Number of people accessing information and service hubs (virtual and in-person), and feedback from users.**
- **Measuring any changes in the circumstances and presenting issues of new clients and those at risk or experiencing homelessness.**
- **Monitoring diversity of referral sources, such as referrals being made by the public, family and friends, self-referrals, or untypical sources.**

Homelessness is brief

People's needs are quickly identified, and they are referred to the right support

Recommendation 27

4.9 The Salvation Army recommends that the NSW Government develop indicators to monitor progress on how and to what extent people's needs are quickly identified when they are facing homelessness, and whether they are referred to the appropriate support. Possible indicators include:

- **Percentage of people accessing Specialist Homelessness Services relative to the estimated number of people experiencing homelessness in NSW.**
- **Satisfaction monitoring measuring how satisfied clients are with the referral process and the services they receive.**
- **Staff feedback on the availability of appropriate referrals and supports at the local level.**

People have access to safe crisis accommodation with appropriate support when they need it

Recommendation 28

4.10 The Salvation Army recommends that the NSW Government introduce indicators to determine whether people are able to access safe crisis accommodation with appropriate support when they need it. Indicators include:

- **Occupancy rates measuring the capacity of crisis accommodation facilities at any given time.**
- **The average time it takes for a person to be placed in crisis accommodation after requesting it.**
- **Reporting mechanisms that measure the frequency of safety or security incidents within crisis accommodations.**
- **Client satisfaction and feedback, which collects data from clients about their experience and satisfaction with the crisis accommodation and support received.**

People are supported out of homelessness into longer-term housing with tailored support

Recommendation 29

4.11 **The Salvation Army recommends that the NSW Government introduce indicators to determine whether people are supported out of homelessness into longer-term housing with tailored support. These include:**

- **Rate of exit to stable housing, where the proportion of people who successfully move from crisis accommodation to stable, permanent housing is measured.**
- **Client satisfaction and feedback data about their experiences and satisfaction with their long-term housing and wrap-around supports.**

Homelessness is not repeated

People with complex needs can access comprehensive, longer-term support so they do not experience repeat homelessness

Recommendation 30

4.12 The Salvation Army recommends that the NSW Government introduce indicators that help determine whether people with complex needs can access comprehensive, longer-term support so they do not experience repeat homelessness. These may include:

- **The percentage of individuals who successfully transition from homelessness to stable housing with continued support services.**
- **The percentage of individuals with complex needs who achieve personal goals related to housing stability, education, employment, and health.**
- **Measures for the development and implementation of tailored support plans for individuals, accounting for trauma, poor health, mental illness, and substance use.**
- **Duration for which individuals, especially children and young people, maintain stable housing after receiving tailored support.**

People have strong connections to their community that protect against repeat homelessness

Recommendation 31

4.13 The Salvation Army recommends that the NSW Government introduce indicators to determine whether people have strong connections to their community that protect against repeat homelessness. These may include:

- **Participation rates in community activities.**
- **Client self-reported increases in the number of meaningful connections with family, friends, and community members after participating in community development initiatives.**
- **The percentage of individuals who experience a reduction in repeat homelessness due to strengthened community ties.**

People have access to housing that meets their changing needs across their lifespan

4.14 Indicators are required to determine whether people have access to housing that meets their changing needs across their lifespan.

Recommendation 32

4.15 The Salvation Army recommends that the NSW Government introduce indicators to determine whether people have access to housing that meets their changing needs across their lifespan. Indicators may include:

- **Number of joint initiatives that lead to integrated support.**
- **Number of mainstream service providers receiving cultural safety training aimed at supporting Aboriginal and Torres Strait Islander people and people form culturally and linguistically diverse backgrounds.**
- **Aboriginal and Torres Strait Islander and culturally and linguistically diverse client perceptions and feelings of cultural safety and satisfaction when accessing mainstream services.**
- **Quality assurance audits to ensure homes meet established safety and quality benchmarks.**

5 Conclusion

5.1 The Salvation Army thanks the New South Wales Government's Homes NSW for the opportunity to provide a written submission to the Consultation on the draft NSW Homelessness Strategy 2025-2035.

5.2 The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance. Further information can be sought from government.relations@salvationarmy.org.au.

The Salvation Army Australia Territory

February 2025