



## **Women With Disabilities ACT**

Submission to

**TOWARDS A NEW HOUSING STRATEGY: AN ACT COMMUNITY CONVERSATION**

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*Women With Disabilities ACT acknowledges and pays respect to the Ngunnawal peoples, the traditional custodians of the ACT Region on whose land our office is located. We pay our respects to their Elders past, present and emerging. We acknowledge their spiritual, social, historical and ongoing connection to these lands and the contribution they make to the life of the Australian Capital Territory.*



ABN: 74 908 530 982

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### About WWDACT:

Women With Disabilities ACT (WWDACT). WWDACT is a systemic advocacy and peer support organisation for women and girls with disabilities in the ACT. WWDACT follows a human rights philosophy, based on the Convention on the Rights of Persons with Disabilities (CRPD) and the Convention on the Elimination of Discrimination against Women (CEDAW). WWDACT is a Disabled People’s Organisation (DPO), governed by women with disabilities, and its proposals and recommendations to government are consistent with Article 4(3), and Article 29 of CRPD which outline the imperative for consultation with disabled peoples.

## Profile of women with disabilities ACT

The WWDACT constituency is of significant size. In the ACT, there are 32,600 women with a disability, who make up 52.5% of the population of people with disabilities, and 8.5% of the total population of the ACT.<sup>1</sup> The 2015 Survey of Disability Ageing and Carers (SDAC) shows that women with disabilities have higher levels of both full time and part time employment than their counterparts Australia wide, but that relative to non-disabled women and men with disabilities in the ACT they are significantly more disadvantaged. This means that their level of economic security is lower compared to each of these other groups, and in consequence their tendency to housing stress is more frequent and more severe.

Sex disaggregated detailed SDAC data is not publicly available for Income Levels, source of income, or housing tenure. However the survey for the ACT does show that 26% of people with disabilities, living in households are in the lowest two income quintiles. Wages are the main source of income for 32.9% of all ACT people with disabilities, whilst welfare payments are the main source of income for a further 32.6%. Numbers dependent on welfare payments in the ACT are significantly lower than for the whole of Australia (32.6% compared to 55%). Similarly, there is a higher percentage of waged individuals with disabilities in the ACT (32.9%) compared to the rest of Australia (22.4%). This starts to build a picture of a population with disabilities which has the potential to be in the private market. There needs to be further research to determine the precise distribution and circumstances of people with disabilities in the ACT.

**RECOMMENDATION 1:** ACT Government undertake further research to gain better understanding of the economic standing of people with disabilities in the ACT related to their housing tenure, and that data collected is sex disaggregated and made publicly available.

The SDAC also gives us a clearer picture of the nature of the housing market for people with disabilities in the ACT. Twenty-three percent of people with disabilities, living in households, aged 15-64, own their own homes, unencumbered. This rises to 69% of those in the 65+ age bracket. Home owners, with mortgage constitute a further 36% in the younger age bracket of people with disabilities. Logically a much smaller percentage (12%) still has a mortgage in the 65+ age group.

Those in public housing, across both age groups comprise 10% of the population of people with disabilities. and a further 14% are in private rental accommodation. There are also considerable numbers of people with disabilities (5.6%) still living rent-free at home. Just over 1% of those with disabilities live in supported accommodation, such as group houses.

Housing Tenure configurations are summarized in Table 1. The Australian percentages are shown for comparison. The Housing Strategy needs to gather data from people with disabilities in the 'Other Landlord' category, so as to better understand the barriers to obtaining rented accommodation, sustainability of their tenancies, the suitability of the property to meet their physical requirements, and any other stresses that affect them as tenants.

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<sup>11</sup> Australian Bureau of Statistics, Survey of Disability Ageing and Carers, 2015

**Table 1: Housing Tenure ACT (taken from SDAC 2015 Table 7.3)**

	AUS (%)	ACT (%)		
		15-64	65+	ALL
<b>OWNER NO MORTGAGE</b>	22.5	23	68.8	41.1
<b>OWNER WITH MORTGAGE</b>	30.9	35.7	12.1	27.1
<b>RENT (STATE HOUSING)</b>	6.9	9.6	9.1	10
<b>OTHER LANDLORD</b>	25.9	20	5.1	13.8
<b>BOARDER</b>	5.5	3.6	0	3.4
<b>RENT FREE</b>	6.9	5.7	4.3	5.6
<b>OTHER</b>	1.4	1.2	0	0.8

**RECOMMENDATION 2:** That the Housing Strategy target people with disabilities in the private rental market to support sustainable tenancies and ensure their long term housing security.

Despite this positive data story of housing tenure in the ACT for people with disabilities compared to the rest of Australia, the figures do not allow us to understand the suitability of the rental housing for the people with disability who currently have tenure. Nor do they give us an understanding of the correlation between those in the lowest two income quintiles and those in rental accommodation. Nor does it allow us to see the people with disabilities who are suddenly plunged into housing crisis by a change in circumstances. This is when the intersection of low income, landlord prejudice against disabled tenants, and the need for an accessible house combine to plunge people with disabilities into homelessness at worst or extreme housing stress at best. A further piece of the puzzle is supplied from the Anglicare Rental Affordability Snapshot (April 2017) of rental accommodation, which identified the extreme shortage of properties affordable for a person on the Disability Support Pension (DSP). Only one property was found to be available for rental in the ACT costing 30% or less of a DSP.<sup>2</sup>

## Reducing Homelessness

Women with disabilities leaving situations of violence are at high risk of homelessness. The ACT Crisis Services Scheme is designed to meet the crisis needs of women with disabilities who require assistive equipment and/or emergency personal care hours when they seek a pathway to safety. Women with disabilities who attended a focus group on Domestic and Family Violence (DFV)<sup>3</sup> in June 2017, said that the lack of wheelchair accessible crisis accommodation was a major factor preventing them from leaving a violent domestic situation.

WWDACT therefore applauds the measures that the ACT Government has taken to support 28 dedicated homelessness support services to provide 48 homelessness programs to the community. WWDACT questions what capacity these services have to provide service for a woman wheelchair user or needing other mobility assistive equipment. It is essential that when such services are set up that consideration is given to their ability to meet the needs of women with disabilities.

<sup>2</sup> Anglicare, *Rental Affordability Snapshot*, April 2017, accessed online 8 September 2017, at: <http://www.anglicare.asn.au/docs/default-source/default-document-library/rental-affordability-snapshot-2017.pdf?sfvrsn=4>

<sup>3</sup> Canberra Focus Group, 1 June 2017 from 1300 to 1530, conducted by Didactic Enterprises for Lifeline, preparatory to inserting disability content in the DV-alert training package.

**RECOMMENDATION 3:** WWDACT recommends that an eligibility for funding of homelessness services include a requirement for a demonstrated awareness of disability (for example, through having a Disability Action Plan) and that 10% of any physical structures acquired or developed have a minimum of LHA Gold Level accessibility.

## **Strengthening Social Housing Assistance**

WWDACT applauds the ACT Government commitment to construction of 100% LHA Gold Level accessible housing in its housing renewal programme, and the inclusion of 10% or more Class C adaptable units. This requirement has a knock-on effect of creating an environment where there is expertise in the ACT building industry and these construction standards can be easily replicated in the private market.

Women with disabilities have other criteria in addition to the need for an accessible dwelling. Safety in the surrounding environs to the house through good lighting, elimination of dark corners and unlit underpasses, proximity to public transport and to public amenities are important factors for women with disabilities. The development of public housing applauds where this is being integrated with planning of the whole town environment. There is a place for medium density public housing in townhouses or high rise apartments in landscaped surroundings constructed as in-fill close to suburban shops. Inclusionary zoning incentives for developers would stimulate this type of development.

**RECOMMENDATION 4:** WWDACT recommends that inclusionary zoning incentives are developed to stimulate housing development in areas suitable for low income tenants.

## **Rental Review Cycle**

WWDACT acknowledges that the spatial needs that an individual, couple or family where at least one person has disabilities, in a dwelling may change with time. WWDACT favours the development of a culture within public housing that would enable tenants to move to more suitable housing when their spatial needs change. Providing incentives for tenants to relocate to more suitable public housing could put the necessary flexibility into the system so that the vacancies which currently exist across under-utilised dwellings could be rationalised. A 'Rental Review Cycle' could be developed through which the suitability of accommodation could be reviewed at regular intervals. Research would be needed to ascertain what the optimal review interval might be. Relocations could not be forced but could be encouraged through an incentive programme of, for example, rent concession for 1 year after moving.

In the private rental market, an incentive program for landlords that offer multi-year leases, similar in length to the Rental Review Cycle could be developed. This would give would give women with disabilities security of tenure in the private rental market.

WWDACT would like to see the continuation of the Rental Bonds Loans Program and the \$2000 assistance to establish a new tenancy under the Safer Families grants scheme. Mothers with disabilities face insurmountable barriers after leaving a violent relationship. Their disabilities may prevent them from working sufficient hours to earn sufficient money to secure alternative rental accommodation.

**RECOMMENDATION 5:** that the ACT Government develop a Rental Review Cycle and incentives for people to relocate to more suitable accommodation, in order to free up under-utilised public housing dwellings.

## **Increasing Affordable Rental**

Older women and women escaping violence are the largest group requiring emergency accommodation, and the largest group requiring affordable rental accommodation. WWDACT does not have data on the proportion of women with disabilities in these two groups. Anecdotal evidence suggests that their numbers will be lower than their representation as a percentage of the population of women in the ACT (17%) because women with disabilities have assessed that there are no appropriate places for them to go in a crisis. Their first need is for crisis accommodation. ACT refuges do not have the level of accessibility needed to successfully accommodate a woman wheelchair user. This is their initial requirement.

**RECOMMENDATION 6:** that the ACT Government resource the development of at least one ACT refuge, (either by construction of a new facility or refurbishment of an existing refuge) to Class C Adapatable level of accessibility, including visual fire alarms.

## **A Women's Property Initiative for Canberra**

In the longer term, women with disabilities need access to properties at an affordable rental. WWDACT would like to see the ACT Government support the setting up of a women's community housing provider organisation, modelled on the Women's Property Initiative of Victoria<sup>4</sup>. An ACT Women's Property Initiative would need to have charitable status, and be able to participate in crowd funding. It could be supported by the University of Canberra Innovation Centre or linked to the Canberra Innovation Centre. It would need to have operational parameters that all dwellings would be accessible, as well as be linked with the Green Business Council Australia<sup>5</sup>, or perhaps SEE-CHANGE in the ACT<sup>6</sup>, so that the operational costs of running the properties could be minimised. There would be scope to develop an accessible safe house for women escaping violence as part of a multiple apartment complex. This would be an ideal model to set up an example of housing where there was a cooperative which shared disability support for the 1 – 2 tenants with disabilities in a community of mixed aged, older women, single mothers with children and women with disabilities.

**RECOMMENDATION 7:** The ACT Government provide seed funding for 3 years to support the setting-up of a Women's Property Initiative for Canberra.

## **NDIS Housing Cooperative**

WWDACT would like to see the ACT Government support the setting up of an NDIS Housing Cooperative. This would be a one-stop-shop for NDIS Participants who have funding through the NDIS

<sup>4</sup> Women's Property Initiative of Victoria, accessed online on 8 September 2017 at: <http://www.wpi.org.au/>

<sup>5</sup> Green Building Council of Australia, accessed online on 8 September 2017 at: <http://new.gbca.org.au/>

<sup>6</sup> SEE-CHANGE, Enabling Change in our Society, Environment and Economy, accessed online on 8 September 2017 at: <http://www.see-change.org.au/>

Specialist Disability Accommodation framework, to enable them to link up with others with similar funding, and through the cooperative to link with SDA registered housing providers (developers) and investors. Ideally it would be a social venture which would provide employment positions for people with disabilities in a range of roles from professional to administrative. Such an organisation would enable this NDIS initiative to operate effectively. At present there is no mechanism for linkage between individual participants and developers. Specialised developers such as the Summer Foundation<sup>7</sup>, or Housing Choices Australia (<sup>8</sup>) could be consulted/give advice on the set-up and operation of an SDA development. The accommodation set up would be ideal for separate tenancies within a group house.

**RECOMMENDATION 8:** The ACT Government provide office accommodation and one FTE staff person to set up an NDIS Housing Cooperative.

## Increasing Affordable Home Ownership

WWDACT believes that the dearth of accessible houses available for purchase in the ACT is a disincentive for professionals with disabilities to take up employment in the Territory. This then affects the ability of our businesses, community organisations and tertiary institutes to employ people with disabilities, and this in turn means that there are few role models for the community. This is particularly important for young students, including students with disabilities.

WWDACT acknowledges the leadership role that the ACT has taken at the Building Ministers Forum to support inclusion of minimum accessibility requirements into the Building Code. This is a long term objective and needs ongoing government support. Until there is regulation for minimum accessibility features in all new dwellings in the ACT, we will continue to have a dearth of accessible accommodation.

**RECOMMENDATION 9:** that the ACT Government continue its support at the national level for amendment of the Building Code of Australia to include minimum accessibility requirements

## Register of Accessible Accommodation

In the interim, the ACT Government could provide a small rates relief incentive for owners of houses with accessibility features to list their houses on a register administered by the Real Estate Institute (REI) of the ACT, irrespective of whether the current owner requires the accessibility features. This would discourage owners from removing accessibility features when they purchase a house and do not need them. Similarly when the house is on the market, it could be advertised showing the International Symbol of Access (ISA). In this way, existing accessible dwellings could be retained, tracked and mapped across Canberra. The scheme could be extended to rental properties.

**RECOMMENDATION 10:** The ACT government liaise with the Real Estate Institute of the ACT to set up and maintain a register of accessible homes in the territory.

<sup>7</sup> Summer Foundation, accessed online on 8 September 2017 at: <https://www.summerfoundation.org.au/>

<sup>8</sup> Housing Choices Australia, accessed online on 8 September 2017 at: <http://www.housingchoices.org.au/>

## Additional considerations

It is to be hoped that in all housing initiatives, the ACT Government will commit to maintaining the salt-and-pepper approach to having a range of low, medium and high cost development and housing in all suburbs, and to commit to this salt-and-pepper approach being extended to disability accommodation, so that we do not create enclaves of people with disabilities in particular areas, but that they are included in housing developments near to shops and transport.

Equally important is to embargo the development of any dwelling configuration which would put more than 5 people with disabilities in the same multi-bedroom house.

**RECOMMENDATION 11:** that the ACT Housing strategy actively promote inclusion of people with disabilities through their housing and town planning policies.

## Conclusion

The new housing strategy must have accessibility consideration incorporated in all facets of the policy, that the relative disadvantage of women with disabilities compared to non-disabled women and men with disabilities be considered, and that a major object of the policy be to maximise the housing choices for all people in the lowest two income quintiles in the ACT.

## Recommendations

**RECOMMENDATION 1:** ACT Government undertake further research to gain better understanding of the economic standing of people with disabilities in the ACT related to their housing tenure, and that data collected is sex disaggregated and made publicly available.

**RECOMMENDATION 2:** That the Housing Strategy target people with disabilities in the private rental market to support sustainable tenancies and ensure their long term housing security.

**RECOMMENDATION 3:** WWDACT recommends that an eligibility for funding of homelessness services include a requirement for a demonstrated awareness of disability (for example, through having a Disability Action Plan) and that 10% of any physical structures acquired or developed have a minimum of LHA Gold Level accessibility.

**RECOMMENDATION 4:** WWDACT recommends that inclusionary zoning incentives are developed to stimulate housing development in areas suitable for low income tenants.

**RECOMMENDATION 5:** that the ACT Government develop a Rental Review Cycle and incentives for people to relocate to more suitable accommodation, in order to free up under-utilised public housing dwellings.

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