

SUBMISSION

Friday, 20 October 2023

AMA submission –National Housing and Homelessness Plan Public Consultation

Submitted to Housingandhomelessnessplan@dss.gov.au

The Australian Medical Association (AMA) recognises that housing and health are intricately connected and welcomes the chance to make a submission into the Department of Social Services' consultation on the *National Housing and Homelessness Plan (the plan)*. The AMA supports the Australian Government's goal of developing a plan to help more Australians access safe and affordable housing, with a view to collaborating with state and territory governments. The AMA understand the *National Housing and Homelessness Plan* will be a 10-year strategy, which will aim to set out a shared vision to inform future housing and homelessness policy in Australia. The AMA is pleased to see the plan looking to incorporate recommendations from the Productivity Commission on the *National Housing and Homelessness Agreement* review, of which the AMA made a submission.¹

The AMA suggests that the *National Housing and Homelessness Plan* should consider broader social, and community needs, and focus on equity and access issues of appropriate housing for communities with diverse needs, including Aboriginal and Torres Strait Islander people, children, and young people, and those dealing with the impacts of the Covid-19 pandemic and climate change.

1. How can governments and community service providers reduce homelessness and/or support people who may be at risk of becoming homeless in Australia?

The ongoing impacts of the Covid-19 pandemic, along with the devastating effects of fires and floods in Australia over the past few years have highlighted that housing is a fundamental pillar for public health. The AMA suggests that the clear linkages between housing and health should be strongly reflected in the *National Housing and Homelessness Plan*, with a view to improving housing for populations most in need such as lower socio-economic groups, Aboriginal and Torres Strait Islander peoples and communities living in higher-risk areas for natural disasters.

The impacts of Covid-19 on housing, health, and homelessness

The restrictions and isolation that arose from the Covid-19 response highlighted the immense value of stable housing as work and schooling moved to remote settings for much of the population. However, these settings also highlighted the additional risks and hardships faced by people who were in insecure housing or overcrowded households such as:

- Inability to isolate safety from other people in the household infected with Covid-19.
- Inability to isolate or quarantine in accordance with public health orders.
- Increased risk of domestic violence.
- Negative impacts on mental health and wellbeing
- Prolonged exposure to unsafe environments for at-risk children.

- Reduced access to housing supports and other community services for people experiencing homelessness and rough sleepers.

The AMA suggests that the *National Housing and Homelessness Plan* should also consider broader social, and community needs by developing strategies enable governments to respond to additional pressures on social and community housing as was seen during the pandemic. This could include:

- Mobilising primary health care services to people most in need, such as those at risk of, or already experiencing, homelessness.
- Flexible, responsive, and targeted community outreach services attached to housing providers.
- Prioritising vaccine access to populations in insecure or unstable housing.

2. How can governments, across all levels, best work with communities to support better housing outcomes for Aboriginal and Torres Strait Islander peoples?

Australian Institute of Health and Welfare (AIHW) data indicates that in 2018-19, one in five (or 20 per cent) of Aboriginal and Torres Strait Islander households were living in dwellings that did not meet an acceptable standard. This includes houses that have major structural problems or where basic household facilities were unavailable.² The AMA supports the AIHW suggestion that “*addressing infrastructure, health promotion and the policy environment simultaneously*” works as a housing development strategy designed to improve Aboriginal and Torres Strait Islander health outcomes.³ The AMA emphasises this must be done in partnership with Aboriginal and Torres Strait Islander peak organisations and communities.

The [National Agreement on Close the Gap](#) is the agreement between Australian governments and Aboriginal and Torres Strait Islander representatives on the actions that will be taken to meaningfully close the gap in health and life disparities between Indigenous and non-Indigenous Australians. Housing is prominent in this agreement and is cited in the priority reforms and specific targets. The priority reforms are intended to transform the ways in which Australian government work with Aboriginal and Torres Strait Islander peoples, emphasising partnership, self-determination and power sharing.

Of particular relevance to the *National Housing and Homelessness Plan* is Priority Reform 1 – Formal Partnerships and Shared Decision making. Housing is identified as a policy priority area, requiring governments and Aboriginal and Torres Strait Islander organisations to work together to identify pathways forward to improve housing outcomes. The AMA emphasises that Aboriginal and Torres Strait Islander communities and organisations are best placed to advise how the *National Housing and Homelessness Plan* can support their diverse housing needs, but that the plan should also recognise the linkages with housing and health in this particular context. For example – the impacts of overcrowding on communicable disease and the disproportionate prevalence of other illness such as Rheumatic Heart Disease and Otitis Media in Aboriginal and Torres Strait Islander communities. There are also direct links between climate change, housing, and the impact to health outcomes of Aboriginal and Torres Strait Islander peoples which must be considered within the *National Housing and Homelessness Plan*.⁴

The AMA recommends that the Department of Social Services actively seek Aboriginal and Torres Strait Islander expertise to inform the *National Housing and Homelessness Plan*, and supports the recommendations in the NACCHO policy position paper; *Aboriginal Housing for Aboriginal Health* to guide this.⁵ The plan presents an opportunity to shape a well informed and responsive approach to Aboriginal and Torres Strait Islander housing needs that is guided by a commitment to deliver equity, better health outcomes, and significantly reducing the number of people who are living in over-crowded and unfit-for-purpose housing.

5. How could governments work better with industry, community services and other organisations to improve housing outcomes for all Australians?

The AMA believes the *National Housing and Homelessness Plan* should highlight the importance of governments, both at a national and jurisdictional level, working with community services and other organisations, who

interact with issues interlinked with housing and homelessness. This includes interaction with services that cater for communities with a diverse range of needs, especially children and young people.

Child health and housing

Reducing the number of younger children living below the poverty line in Australia must be identified as an important component of the National Housing and Homelessness plan. Access to good housing is a fundamental human right and essential for children to be able to grow up in a healthy and nurturing environment. These basic needs are central to the health of a child, and as such, rates of children experiencing poverty due to inadequate housing, must be addressed in the strategy.

In February 2022, the AMA along with other leading child health peak organisations called on all political parties to urgently prioritise child health.⁶ This call included access to good housing – a fundamental human right and essential to ensure that children are growing up in a healthy, stable, and safe environment that provides them with the best possible opportunities to grow and thrive in these critical development years. The signatories to this statement are experts in child and developmental health, recognising that evidence-based strategies made during the early years of life will have a very powerful and positive impact on the rest of that person's life.⁷

The AMA suggests that the *National Housing and Homelessness Plan* could consider linking to broader policy frameworks focused on child health and wellbeing and developing minimum standards and targets to ensure that all children in Australia have safe, stable, and appropriate housing. The AMA believes that every child has a right to a safe and healthy start to life, regardless of the social and cultural determinants they are born into.⁸

Additionally, the AMA is a member of the Raise the Age Campaign, calling on all governments to raise the age of criminal responsibility from 10 to a minimum of 14 years of age.⁹ Children do not belong in jail and deserve the best start in life to stay healthy, gain an education and be a part of their community. Current legislative settings disproportionately affect Aboriginal and Torres Strait Islander children, and the AMA regards this as a critical child health issue that must be addressed, and acknowledged in the *National Housing and Homelessness Plan*, as custodial settings are no home for children. Justice reinvestment, and ensuring safe, stable and appropriate housing, is an avenue to keep children out of custodial settings.

The AMA also recognises that children are going to face the full consequences of a heating climate. To ensure a safe future and liveable environment for our children, we need to rapidly transform our energy systems and economy to reduce the dependence on fossil fuels. We suggest that the National Housing and Homelessness plan identifies climate change as a critical factor for child health and wellbeing.

6. How can governments and the private and community sectors, help to improve sustainable housing and better prepare housing for the effects of climate change.

Recent climate related events in Australia including the 2019-20 bushfires and the 2022 floods have caused widespread housing and property loss in affected areas. People are facing multiple hardships to rebuild their lives and homes including navigating insurance processes, maintaining an income with nowhere to live, the trauma of rebuilding after a devastating event, and interruptions to building and supply chains meant it can take several-years to rebuild for those who can afford to.

The AMA suggests the plan has capacity to acknowledge the increased risks faced by communities in areas prone to extreme weather events. This could include recommendations around disaster management plans, climate adaptation and resilience, aligned with the broader priority setting already underway at Commonwealth, State and Territory levels. Further, the AMA suggests there is scope for *National Housing and Homelessness Plan* to focus on minimum standards for rental property to ensure that tenants have adequate insulation, heating, and cooling throughout the year. The National Housing and Homelessness plan should also include steps to mitigate the effects of climate change in housing planning at multiple levels, including changes to urban planning, construction, and incentives to retrofit existing housing to be more energy efficient.

From a health perspective, maintaining public health becomes far more challenging when communities become displaced due to extreme weather events such as floods and fires. The AMA suggests that planning around

temporary crisis housing and longer-term sustainable and climate-appropriate housing should also be informed by broader community health priorities such as ability to access primary health care and continuity of care for people in climate-affected areas.¹⁰

The AMA encourages the *National Housing and Homelessness Plan* to engage with Aboriginal and Torres Strait Islander people, noting that climate change will disproportionately affect their communities. Climate change is compounding historical injustices and disrupts cultural and spiritual connections to Country that are central to health and wellbeing.¹¹

7. Is there anything else you would like to tell us?

Housing as a determinant of health

In the 2020 Position Statement *Social Determinants of Health*, the AMA observed that while there is strong evidence that health system spending contributes to better health outcomes,¹² it has also been recognised that almost half of an individual's overall health and wellbeing can be attributed to socioeconomic factors.¹³ Measuring the precise health impacts of investments outside the health domain can be difficult, but it is clear that some of the biggest improvements for people at risk of poor health outcomes derive from addressing the social determinants of health, including housing, social care, and isolation.

The AMA asserts that action on the social determinants of health is an appropriate way to address avoidable health inequalities and the *National Housing and Homelessness Plan* presents an opportunity to link adequate housing standards with improved health outcomes for communities most in need. The World Health Organization's (WHO) Commission on Social Determinants of Health made recommendations about the importance of closing the gap in health outcomes by addressing the social determinants of health.¹⁴ The WHO recommends a 'whole of government' approach that recognises the impact of policies in a range of portfolio areas, and the subsequent impacts on health.

Recommendations include:

- Give every child the best start in life.
- Enable all children, young people, and adults to maximise their capabilities and have control over their lives.
- Create fair employment and good work for all.
- Ensure a healthy standard of living for all.
- Create and develop healthy and sustainable places and communities.
- Strengthen the role and impact of ill-health prevention.¹⁵

Conclusion

The AMA welcomes the chance to submit into the Department of Social Services' consultation on *the National Housing and Homelessness Plan*. The AMA strongly encourages the department to consider the detrimental health impacts of inadequate housing and homelessness, when making recommendations to improve access to safe and affordable housing for all Australians.

Contact

president@ama.com.au

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- ⁴ Australian Indigenous HealthInfoNet (2023) *Climate change and adaption*. Retrieved 04/10/23 from: <https://healthinonet.ecu.edu.au/learn/determinants-of-health/environmental-health/climate-change/#:~:text=Aboriginal%20and%20Torres%20Strait%20Islander,impact%20their%20health%20and%20wellbeing>.
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- ⁸ Australian Medical Association (2023) *AMA Submission Commonwealth Early Years Strategy Consultation*. Retrieved 04/10/23 from: <https://www.ama.com.au/articles/ama-submission-commonwealth-early-years-strategy-consultation#:~:text=The%20AMA's%20submission%20to%20the,determinants%20they%20are%20born%20into>
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- ¹¹ HEAL Network & CRE-STRIDE (2021), *Climate Change and Aboriginal and Torres Strait Islander Health, Discussion Paper, Lowitja Institute, Melbourne, DOI: 10.48455/bthg-aj15*
- ¹² Cylus, J., Permanand, G. & Smith, P. (2018). *Policy Brief. Making the economic case for investing in health systems: What is the evidence that health systems advance economic and fiscal objectives? World Health Organization Regional Office for Europe*. Retrieved 04/10/23 from: http://www.euro.who.int/_data/assets/pdf_file/0010/380728/pb-tallinn-01-eng.pdf?ua=
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- ¹⁴ World Health Organization (2008) *Commission on the Social Determinants of Health*. Retrieved 04/10/2023 from: <https://www.who.int/initiatives/action-on-the-social-determinants-of-health-for-advancing-equity/world-report-on-social-determinants-of-health-equity/commission-on-social-determinants-of-health>
- ¹⁵ Ibid.