



Submission to the Consultation on Establishing a 10-year Strategy for Social and Affordable Housing

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Domestic Violence Victoria and Domestic Violence Resource Centre Victoria

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Acknowledgments

Acknowledgement of Aboriginal and Torres Strait Islander peoples

Domestic Violence Victoria (DV Vic) and Domestic Violence Resource Centre Victoria (DVRCV) acknowledge Aboriginal and Torres Strait Islander peoples as Australia's First Nations and Traditional Owners of Country. We pay respects to Elders past, present and emerging. We acknowledge that sovereignty was never ceded and recognise the right to self-determination and continuing connection to land, waters and culture.

Acknowledgment of victim-survivors

DV Vic and DVRCV acknowledge the strength and resilience of adults, children and young people who have experienced family violence, and recognises that it is essential that responses to family violence are informed by their experiences and advocacy. We pay respects to those who did not survive and acknowledge friends and family members who have lost loved ones to this preventable and farreaching issue.





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About DV Vic and DVRCV

In 2021, Domestic Violence Victoria (DV Vic) and the Domestic Violence Resource Centre Victoria (DVRCV) are merging to form a new entity. The merger brings together the peak body for Victoria's specialist family violence services supporting victim survivors (DV Vic) and the state's only specialist family violence Registered Training Organisation (DVRCV). Under a new name and united vision, we are working towards a world beyond family and gender-based violence, where women, children and all marginalized communities are safe, thriving, and respected. To achieve this vision we advocate on behalf of and represent the specialist family violence sector, build the capability of current and emerging workforces to prevent and respond to family violence and drive the social and cultural change required to end all forms of family violence and violence against women.

Language and Terminology Used

Family Violence

DV Vic and DVRCV recognise family violence as any behaviour that occurs in family, domestic or intimate relationships that is physically or sexually abusive; emotionally or psychologically abusive; economically abusive; threatening or coercive; or is in any other way controlling that causes a person to live in fear for their safety or wellbeing or that of another person. This definition includes violence within a broader family context, such as extended families, kinship networks and 'family-like' relationships which can include a paid or unpaid carer for people with disabilities; families of choice for LGBTIQ people; and cultural kinship networks.¹ In relation to children, family violence is defined as behaviour by any person that causes a child to hear or witness or otherwise be exposed to the effects of the above behaviour.²

Victim-Survivor

DV Vic and DVRCV use the term victim-survivor to refer to both adults and children who experience family violence.³ The term victim-survivor includes all individuals and groups of people who are primarily targeted and affected by family violence. This gender-inclusive use of language is applied to acknowledge the disproportionate harms of family violence against people who identify as women and their children, while at the same time recognising that family violence impacts people across a diversity of gender identities, sexual identities, social and cultural contexts, and within various intimate partner and family and family-like relationships.⁴ DV Vic and DVRCV acknowledges the emerging evidence-base that is articulating the ways in which gender diverse and gender non-binary communities are targeted

¹ Domestic Violence Victoria. (2020). *Code of Practice for Specialist Family Violence Services for Victim-Survivors* (2nd ed.). Domestic Violence Victoria. http://dvvic.org.au/members/practice-development/; *Family Violence Protection Act 2008* (Vic) s.5. http://www8.austlii.edu.au/cgi-bin/viewdb/au/legis/vic/consol_act/fvpa2008283/.

² Domestic Violence Victoria. (2020). *Code of Practice for Specialist Family Violence Services for Victim-Survivors* (2nd ed.); *Family Violence Protection Act 2008* (Vic) s.5. http://www8.austlii.edu.au/cgibin/viewdb/au/legis/vic/consol/act/fvpa2008283/.

³ Domestic Violence Victoria. (2020). *Code of Practice for Specialist Family Violence Services for Victim-Survivors* (2nd ed.).

⁴ Domestic Violence Victoria. (2020). Code of Practice for Specialist Family Violence Services for Victim-Survivors (2nd ed.).





and affected by family violence, and which have been under-researched to date. DV Vic and DVRCV also acknowledges that intersecting systems of privilege and oppression translate to diversity in experiences and affects for different groups of victim-survivors.

Perpetrator/User of Violence

The terms 'perpetrator' and 'user of violence' are used interchangeably to refer to adults who use family violence. DV Vic and DVRCV acknowledges that across the spectrum of experiences and relationships in which family violence is perpetrated, family violence is most frequently and severely perpetrated by men. DV Vic and DVRCV understands this to be a manifestation of gender inequality and gender hierarchies in Australian society, and that people perpetrating violence also experience intersecting systems of both privilege and oppression.





Executive Summary

DV Vic and DVRCV welcomes the commitment of the State government and Homes Vic to ensure Victorians can access a safe, affordable and appropriate home. The *10-year strategy for Social and Affordable Housing* (the Strategy) shows a strong commitment in ensuring people in Victoria can access a safe, affordable and appropriate home. DV Vic and DVRCV believes that victim-survivors have a right to a safe, affordable and appropriate home, and that the Victorian Government has a responsibility to realise this possibility. We look forward to working with Homes Vic and the Victorian Government to extend and strengthen the Strategy's vision for victim-survivors.

Summary of recommendations

Recommendation: The Strategy increase the stock of social housing to fully realise its vision 'for all Victorians to have access to a safe, affordable and appropriate home'.

Principle: People at the centre

Recommendation: Victorian Government and Homes Vic adhere to the principles of the *Family Violence Experts by Experience Framework* to ensure victim-survivors are engaged in co-production of a social and affordable housing system, thereby aligning with RCFV Recommendation 201 to ensure the approach uses safe and constructive ways to engage with victim-survivors in informing policy development and service delivery.

Focus area one: Pathways

Recommendation: Embed a Safe at Home approach into the Strategy, that ensures ongoing funding to meet demand for the following initiatives, in recognition of their role in preventing entry into homelessness:

- Flexible Support Packages, which aligns with Recommendation 9 of the Inquiry
- Personal Safety Initiatives
- Disability and Family Violence Crisis Response Initiative
- Private Rental Assistance Program, which aligns with Recommendation 11 of the Inquiry

Recommendation: The Strategy addresses barriers faced by young people, persons experiencing family violence and other groups in relation to difficulties entering or remaining in the private rental market through continued development of the Private Rental Assistance Program, with a view to making the program more accessible for these cohorts.

Recommendation: The Strategy commits to increasing the provision of social housing in Victoria to the national average of 4.5 % of total housing stock.

Recommendation: The Strategy enables an increase in crisis and long-term accommodation and support options for perpetrators of family violence.





Recommendation: The Strategy includes advocacy to the Commonwealth Government to:

- Permanently increase the rate of JobSeeker payments.
- Reconsider the indexation of this payment to the Consumer Price Index.
- Urgently consider the barriers to income support accessibility.

Focus area two: Communities

Recommendation: The Strategy include principles of women safety initiatives, driven by the goal to improve the safety of victim-survivors and support their recovery through urban and building design.

Recommendation: The Strategy uses co-design principles and an intersectional lens, thereby aligning with the Victorian Government's *Everybody Matters: Inclusion and Equity Statement*.

Focus area three: Growth

Recommendation: The Strategy includes action on comprehensive demand modelling for social and affordable housing across the state to determine how much additional social and affordable housing stock is truly needed to respond to family violence.

Recommendation: The Strategy clearly outlines how homes will be allocated to victim-survivors through the Big Housing Build, and pathways and options for accessing safe, secure long-term affordable housing for victim-survivors once allocations are exhausted.

Recommendation: The Strategy embeds an intersectional approach to ensure people who experience discrimination have access to specific support and housing needs.

Focus area four: Partnerships

Recommendation: The Strategy include partnerships and provisions that address economic abuse to support victim-survivors to remain in their homes, access social housing or other forms of safe and affordable housing.

Recommendation: The Strategy includes the development of strengthened referral pathways and education and training for professionals working in specialist homelessness services and real estate sector to identify family violence, refer to appropriate services, and support victim-survivors in accessing and/or sustaining safe and secure tenancies.

Recommendation: Collaborate with DV Vic and DVRCV to work towards a future where every person in Victoria has access to a safe, affordable and appropriate home.





Introduction

Domestic Violence Victoria (DV Vic) and Domestic Violence Resource Centre Victoria (DVRCV) welcome the opportunity to provide feedback on the *10-Year Strategy for Social and Affordable Housing* sector consultation paper (the Strategy).

DV Vic and DVRCV strongly believes that the vision of the Strategy can be fully realised if there is sufficient social housing in Victoria. The lack of social housing in Victoria is a significant barrier to ending homelessness. As the Inquiry found, 'the provision of adequate social housing is a protective factor against homelessness, particularly for people with complex needs'. This is because 'housing costs are linked to income, rather than market prices,' thereby protecting individuals from income reductions or unexpected shocks. As a result, the overarching recommendation underpinning DV Vic and DVRCV's submission is that the Strategy increase the stock of social housing to fully realise its vision 'for all Victorians to have access to a safe, affordable and appropriate home'.

As the recent Parliamentary Inquiry into Homelessness into Victoria (the Inquiry) found, family violence is 'the main reason individuals accessing homelessness services seek assistance in Victoria'. Victim-survivors are often forced to leave their homes, communities and lives to find safety away from perpetrators. The impact of this relocation is significant on adult and child victim-survivors and has long-term impacts, often lasting beyond the end of a violent relationship. Accordingly, the Strategy must have responding to family violence at its heart.

Many of the recommendations from the Inquiry pertaining to family violence reflect DV Vic's submissions. The Strategy is an opportunity to implement the findings, and our submission to the Strategy will reiterate many of the Inquiry's recommendations. Further, we submit that the Strategy should take into account the recommendations of the Royal Commission into Family Violence (RCFV). In making this submission, DV Vic and DVRCV also endorses the submissions of the Council to Homeless Persons and No To Violence. Finally, this submission should also be read alongside the Make Social Housing Work Framework, which DV Vic and DVRCV are signatory to.

This submission is structured to respond to the questions posed around the principle 'people at the centre' and focus areas of the Strategy, specifically as they relate to victim-survivors of family violence. We look forward to working with Homes Vic and the Victorian Government to see the Strategy's vision 'for all Victorians to have access to a safe, affordable and appropriate home' become a reality.

⁵ Parliament of Victoria. (2021). *Inquiry into homelessness in Victoria: Final report*, p.169.

⁶ Parliament of Victoria. (2021). *Inquiry into homelessness in Victoria: Final report*, p.169.

⁷ Parliament of Victoria. (2021). *Inquiry into homelessness in Victoria: Final report.* Victorian Government, p.69.

⁸ Victorian Government. (2021). *Establishing a 10-Year Strategy for Social and Affordable Housing: Sector Consultation Paper.* Victorian Government, p.11.





Principle: People at the Centre

DV Vic and DVRCV welcome the opportunity to input into actions the Government should take to seek, hear and respond to people who need and use social and affordable housing. The RCFV Recommendation 201 stated that the 'Victorian Government and agencies that respond to family violence identify and develop safe and constructive ways to ensure that the voices of victims are heard and inform policy development and service delivery'. It is DV Vic and DVRCV's position that this should be embedded in the Strategy. The *Family Violence Experts by Experience Framework* (the Framework) provides a useful starting point for the Government to consider best practice in embedding the voices of victim-survivors into a future safe and affordable housing system.

Family Violence Experts by Experience Framework

The Family Violence Experts by Experience Framework has been developed by DV Vic and the University of Melbourne, with the aim to enhance the ability of specialist family violence services to provide opportunities for victim-survivor advocates to influence policy change, service planning and practice. The Framework is based on the belief that 'responses to family violence will be most effective and safe if they are informed and developed in partnership with victim-survivors'. This is aligned with the position taken in the 10-Year Strategy for Social and Affordable Housing sector consultation paper that embedding the voice of survivor advocates at all levels of decision making will lead to improvements in the lives of the people who require social and affordable housing.

The Framework has been developed in consultation with victim-survivors and key organisations and it aligns with the *Code of Practice: Principles and Standards for Specialist Family Violence Services for Victim-Survivors* (the Code), which recognises lived experience as a fundamental element that underpins all work undertaken by the sector. ¹² The Framework is based on ten principles, including transparency, value, reciprocity, support, accountability, inclusion, and sustainability.

One of the key principles that underlies the Framework is 'co-production'. Co-production is about engaging survivor advocates at the strategic level in the decision-making process. The Framework defines co-production as a mechanism which allows 'services and those with lived experience to come together to design policies and services that achieve better outcomes.' The underlying justification for the use of co-production is that the needs of service users are better met when

⁹ Victorian Government. (2021). *Ensure voices of victims are heard and inform policy development and service delivery.* https://www.vic.gov.au/family-violence-recommendations/ensure-voices-victims-are-heard-and-inform-policy-development-and.

¹⁰ Hegarty, K., Lamb, K. & Parker, R. (2020). *The Family Violence Experts by Experience Framework: Research Report & Framework 2020*, University of Melbourne & Domestic Violence Victoria. http://dvvic.org.au/wp-content/uploads/2020/08/DVV_EBE-Framework-Report.pdf

¹¹ Domestic Violence Victoria. (2020). *The Family Violence Experts by Experience Framework: Research Report and Framework.*

¹² Domestic Violence Victoria. (2020). *Code of Practice: Principles and Standards for Specialist Family Violence Services for Victim-Survivors*, p. 38.

¹³ Domestic Violence Victoria. (2020). *Code of Practice: Principles and Standards for Specialist Family Violence Services for Victim-Survivors*, p. 22.





people with lived experience are involved in designing and evaluating policies and services. ¹⁴ Consultation processes alone are not adequate and consumer engagement based on a co-production model can provide survivor advocates with a varied degree of agency and influence. ¹⁵ In order to provide targeted and tailored responses to people requiring specialist support and housing, including people experiencing family violence with specific and rapidly changing circumstances and needs, it is important not just to hear and respond to people's voices but to include them in the strategic level planning. The Framework provides a great example of what actions can be taken to ensure victim-survivors who need and use social and affordable housing are at the centre of the social and affordable housing system through co-production.

While the Framework has been developed to guide collaborative processes for engaging survivor advocates by specialist family violence services, it can provide a useful starting point to consider actions to take to ensure that victim-survivors are at the centre of a future social and affordable housing system. The following section highlights some examples from the sector that align with the best practice principles of engaging victim-survivors of family violence. ¹⁶

Below are three examples of lived experience groups who can be engaged in co-production of the Strategy to ensure the voices of survivors of family violence are incorporated in its development:

WEAVERS

The WEAVERs (Women and children who have Experienced Abuse and Violence: Advisors and Researchers) is a survivor-led research and advocacy group hosted by the University of Melbourne's Research Alliance to End Violence against women and their children (MAEVe). It aims to undertake research informed by the experiences and priorities of survivors of violence and abuse, and for survivor advocates to be partners in the production and dissemination of knowledge.¹⁷ The WEAVERs framework is based on the principle of 'co-production of knowledge'¹⁸. WEAVERs undertake research in collaboration with MAEVEs academic team and advise MAEVe on areas of research and research design, which may include co-design and input into methodologies.

inTouch Inspire for Change

Inspire for Change: Multicultural Voices of Lived Experience is a lived experience advisory group established by InTouch Multicultural Centre Against Family Violence. The group includes past clients from different cultural backgrounds who are at least one-year post-family violence crisis. The purpose

¹⁴ Boyle, D., Coote, A., Sherwood, C., & Slay, J.. (2013). *Right Here Right Now: Taking Coproduction into the mainstream*. https://www.nesta.org.uk/report/co-production-right-here-right-now/

¹⁵ Domestic Violence Victoria. (2020). *The Family Violence Experts by Experience Framework: Research Report and Framework.*

¹⁶ DV Vic and DVRCV recognise the expertise of lived experience groups in the homelessness sector, including: the Council to Homeless Persons' Peer Education Support Program; Launch Housing's Lived Experience Advisory Group; and Flat Out's Living Expertise Group.

¹⁷ Safer Families Centre of Research Excellence. (nd). WEAVERS: Women and children who have Experienced Abuse and Violence. https://www.saferfamilies.org.au/weavers

¹⁸ Safer Families Centre of Research Excellence. (nd). WEAVERS: Women and children who have Experienced Abuse and Violence.





of this advisory group is to inform the current family violence reforms and advise various stakeholders on different issues relating to family violence. The group members provide expert advice from their lived experiences, informing inTouch projects and programs as well as advocating for systemic change. ¹⁹

Victim Survivors' Advisory Council

Following the RCFV's recommendations, the Victim Survivors' Advisory Council (VSAC) was developed by the Victorian government 'to give people with lived experience of family violence a voice and ensure they are consulted in the family violence reform program'. VSAC's role is to place people with lived experience at the centre of family violence reform and include the diversity of the family violence experience in the advice to the government.

The survivor advisory groups mentioned above can be consulted for input into the Strategy, as they include victim-survivors of family violence who have had experience with the housing and homelessness system. These groups provide models for co-production that can be utilised by the government to ensure that people are at the centre of the Social and Affordable Housing Strategy and that it responds to their diverse needs. It is also important to engage people who have been evicted from the social housing. This can help improve social housing outcomes for people who were failed by the system and respond to their specific support needs to help them sustain tenancy.

Recommendation: Victorian Government and Homes Vic adhere to the principles of the *Family Violence Experts by Experience Framework* to ensure victim-survivors are engaged in co-production of a social and affordable housing system, thereby aligning with RCFV Recommendation 201 to ensure the approach uses safe and constructive ways to engage with victim-survivors in informing policy development and service delivery.

Focus area 1: Pathways

Question for public consultation: What actions will enable people to access social housing, sustain their tenancies, and move between different housing options as their needs change?

DV Vic and DVRCV endorse a 'Safe at Home' approach to responding to family violence, whereby victim-survivors remain in the home, while perpetrators are excluded from the home for their use of violence. We draw attention to a number of initiatives below that support this approach.

¹⁹ InTouch Multicultural Centre against Family Violence. (nd). *Inspire for change, multicultural voices of lived experience*. https://intouch.org.au/our-work/leadership/inspire-for-change-advisory-group/

²⁰ Victorian Government. (2020). *Victim Survivors' Advisory Council (VSAC)*. https://www.vic.gov.au/victim-survivors-advisory-council

²¹ Victorian Government. (2020). Victim Survivors' Advisory Council (VSAC).





A Safe at Home Approach

DV Vic and DVRCV agree with and maintain the Royal Commission position that the best housing outcome for many victim-survivors is to be supported to stay in their own home. ²² Homelessness as a result of family violence often leads to a lifetime of disadvantage, discrimination and poverty. ²³ This is particularly true for children, as research demonstrates that children who experience homelessness are more likely to experience homelessness as adults. ²⁴ Enabling victim-survivors to stay in their home therefore prevents them from needing to spend prolonged periods of time in crisis accommodation and prevents them from becoming entangled in the housing and homelessness system.

DV Vic and DVRCV believes that as a principle, a Safe at Home approach should be the preferred housing response to victim-survivors of family violence. Safe at Home refers to a group of interventions that enable victim-survivors to remain in their home, while the perpetrator of the family violence leaves, often with a Family Violence Intervention Order (FVIO) that includes exclusion provisions. Safe at Home interventions are based on the principle that it is perpetrators of family violence that should be held accountable for their use of violence by having to leave the home, rather than victim-survivors being penalised and disadvantaged. As stated within the Inquiry, '[h]elping a person experiencing family violence stay in their home where it is safe to do so is a far better option to being forced into homelessness and attempting to access already overcrowded crisis and transitional accommodation.' Safe at Home approach safe at Home approach should be the preferred housing forced into homelessness and attempting to access already overcrowded crisis and transitional accommodation.' Safe at Home approach sa

While a Safe at Home response is not appropriate for everyone, particularly if the risk of family violence is high, Safe at Home responses have been successful at minimising housing insecurity for some victim-survivors. DV Vic and DVRCV recommend that Safe at Home responses are complemented by:

- Family violence Flexible Support Packages
- Personal Safety Initiatives
- Disability and Family Violence Crisis Response Initiative
- Private Rental Assistance Program

By supporting the above recommendations, victim-survivors would be able to sustain their tenancies to prevent entry into homelessness. At the same time, DV Vic and DVRCV recognise that victim-survivors may choose to leave their homes.

²² Royal Commission into Family Violence. (2016). Volume II Report and recommendations. Victorian Government. p38.

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²³ Parliament of Australia. (2014). *Domestic, family and sexual violence in Australia: an overview of the issues*. https://www.aph.gov.au/About Parliament/Parliamentary Departments/Parliamentary Library/pubs/rp/rp1415/ViolenceA ust.

²⁴ Flatau et al. (2013). *Lifetime and intergenerational experiences of homelessness in Australia*. Australian Housing and Urban Research Institute. https://www.ahuri.edu.au/ data/assets/pdf file/0028/1999/AHURI Final Report No200 Lifetime-and-intergenerational-experiences-of-homelessness-in-Australia.pdf

²⁵ McAuley Community Services for Women (McAuley) have recently conducted research and published grey literature proposing recommendations to the Safe at Home approach. For more information, contact McAuley.

²⁶ Parliament of Victoria. (2021). *Inquiry into homelessness in Victoria: Final report*, p.131.





Family Violence Flexible Support Packages

Flexible support packages (FSPs) were introduced in 2015-16 and have revolutionised the nature of specialist family violence support. Once a victim-survivor meets eligibility, they are able to access a package of up to \$10 000 (with an average package size of \$3 000) to enhance safety, wellbeing and independence. The inherently flexible nature of the packages mean that support can be tailored in a more responsive and agile way that addresses the unique risks, needs and impacts of family violence on each individual victim-survivor, including children. FSPs provide options for accessing immediate safety for clients, such as facilitating access to alternative short- and long-term accommodation. They also increase the dignity and choice of victims-survivors when they are rebuilding their lives as a result of family violence. They enable them to buy good quality material items to assist with their recovery, as well as purchase specialised counselling, training and education courses and materials, and pay off bills and debts that would have otherwise inhibited their recovery from family violence.

DV Vic and DVRCV welcome the Victorian State Budget announcement that FSPs will be funded \$87.3 million over 4 years, an equivalent of 5 700 FSPs each year. Continuing flexible, individually tailored support is essential for the wellbeing of victim-survivors and enables services ability to provide a Safe at Home response. DV Vic and DVRCV believe that FSPs prevent victim-survivors from entry into homelessness. We not only agree with Recommendation 9 of the Inquiry that the Victorian Government provide ongoing funding for FSPs, but advocate that funding is guaranteed at least at the same amount as previous investment.

Personal Safety Initiatives

An important feature of a Safe at Home approach is the Personal Safety Initiative (PSI). PSIs allow victim-survivors to remain safe at home through safety and security audits and security responses, including technology or property modifications. While PSI packages are funded through FSPs,²⁸ infrastructure around the PSI program, including the roles of PSI Coordinators, is supported by the Federal Government through the Keeping Women Safe in their Homes Initiative.²⁹

Disability and Family Violence Crisis Response Initiative

The Disability and Family Violence Crisis Response Initiative (DFVCRI) supports victim-survivors with a disability to access a family violence crisis accommodation response, or immediate disability support to remain in their own home. 30 Victim-survivors with a disability can access support for up to 12 weeks to a maximum of \$9 000 per person. DV Vic and DVRCV welcome the extension of funding for

²⁷ Victorian Government. (2020). *Victorian Budget 2020/21 Putting people first: Service delivery budget paper No.3*. Victorian Government, p. 73.

²⁸ Victorian Government. (2019). *Personal safety initiative (PSI) operational guidelines*. https://providers.dhhs.vic.gov.au/personal-safety-initiative-operational-guidelines, p.8.

²⁹ Victorian Government. (2017). *Keeping women and children safe*. https://www.premier.vic.gov.au/keeping-women-and-children-safe/; Australian Government. (2021). *Keeping women safe in their homes*. https://www.dss.gov.au/women-programs-services-reducing-violence/keeping-women-safe-in-their-homes.

³⁰ Victorian Government. (2020). *Disability and Family Violence Crisis Response*. https://providers.dhhs.vic.gov.au/disability-and-family-violence-crisis-response





DFVCRI until 30th June 2024, as they enable victim-survivors of family violence with a disability to remain safe at home, or access family violence crisis accommodation while exploring long-term options.

Private Rental Assistance Program

The Private Rental Assistance Program (PRAP) was established following the RCFV to support Safe at Home responses. While the client eligibility has expanded to include all clients accessing homelessness services, PRAP has supported victim-survivors to maintain a tenancy, prevent eviction, and find new properties promptly. Without ongoing funding for this program, a significantly larger proportion of FSP money will need to be used for housing related needs, undermining family violence services' ability to respond to other impacts related to family violence and diluting the original intent of FSPs. Continuation of the PRAP was recommended in the Inquiry, which stated 'That the Victorian Government ensure ongoing funding for the Private Rental Assistance Program in recognition of its key role in preventing entry into homelessness and that the funding grows to meet demand'.³¹

Safe at Home responses to family violence play a significant role in preventing victim-survivors of family violence including children from entering the housing and homelessness system. DV Vic and DVRCV strongly advocate that a Safe at Home approach is centrally embedded into the Strategy, given that 'early intervention is crucial in ending homelessness'.³²

Recommendation: Embed a Safe at Home approach into the Strategy, that ensures ongoing funding to meet demand for the following initiatives, in recognition of their role in preventing entry into homelessness:

- Flexible Support Packages, which aligns with Recommendation 9 of the Inquiry
- Personal Safety Initiatives
- Disability and Family Violence Crisis Response Initiative
- Private Rental Assistance Program, which aligns with Recommendation 11 of the Inquiry

The Inquiry committee also heard evidence that some cohorts of users faced barriers to accessing PRAP due to a lack of rental history, including victim-survivors and young people.³³ This is alarming, given that at least 6,000 young people are homeless in Victoria on any given night.³⁴

Family violence is the leading cause of homelessness among children and young people in Australia. In 2019–20, half of all younger clients (under 18) seeking specialist homelessness services experienced

³¹ Parliament of Victoria. (2021). *Inquiry into homelessness in Victoria: Final report*, p.139.

³² Parliament of Victoria. (2021). *Inquiry into homelessness in Victoria: Final report*, p. xx.

³³ Parliament of Victoria. (2021). *Inquiry into homelessness in Victoria: Final report*, p.137.

³⁴ Melbourne City Mission. (nd). *What is youth homelessness?* <u>https://www.mcm.org.au/homelessness/frontyard/what-is-youth-homelessness</u>





family violence.³⁵ In 2019-2020, almost 42 400 young people aged 15 to 24 years presented alone to those services and family violence was the most common reason for seeking support.

DV Vic and DVRCV therefore endorse Recommendation 12 of the Inquiry, that the Victorian Government consider the barriers faced by young people, persons experiencing family violence and other groups in relation to difficulties entering or remaining in the private rental market in continued development of the Private Rental Assistance Program, with a view to making the service more accessible for these cohorts.

Recommendation: The Strategy addresses barriers faced by young people, persons experiencing family violence and other groups in relation to difficulties entering or remaining in the private rental market through continued development of the Private Rental Assistance Program, with a view to making the program more accessible for these cohorts.

Sufficient social housing stock

The lack of exit points from crisis and transitional accommodation creates a bottleneck in family violence refuges and is resulting in victim-survivors staying in family violence refuge well past the point where their safety crisis has been stabilised. Originally intended to house victim-survivors for six to eight weeks while their family violence crisis was stabilised, some victim-survivors are staying in family violence refuges for many months. This is particularly true for victim-survivors on temporary visas, who in addition to having no access to income or income support payments, are more likely to have large families in need of a home with more than three bedrooms. Strict immigration policies are blowing out wait times for visa applications, leaving many of these families waiting in limbo indefinitely. It is especially difficult to find long-term housing for families in this situation. Data from the Victorian Government's *Support funding for victim-survivors on temporary visas in refuge* shows that 55 per cent of victim-survivors on temporary visas assisted by family violence refuges in the first three quarters of the 2018-19 financial year were in refuge for more than 26 weeks. ³⁶ Our member services report that there are some cases in which victim-survivors on temporary visas remain stuck in family violence refuges for years.

For victim-survivors with a disability, it is a similar story. While the DFVCRI can support victim-survivors with a disability to access a family violence crisis accommodation response, finding an affordable, accessible long-term housing option that meets a victim-survivor's and/or their children's unique needs continues to be extremely challenging in the current housing environment. Without long-term housing options, many victim-survivors with disabilities and their children are into homelessness, or return to an unsafe home, where the chance of serious injury, disability and death can be high.

³⁵ Australian Institute of Health and Welfare. (2020). *Specialist homelessness services annual report*. https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-annual-report/contents/clients-who-have-experienced-family-and-domestic-violence.

³⁶ Family Safety Victoria. (2019) *Q3 Acquittals report summary: Support for funding for victim survivors on temporary visas in refuge' 1 January 2019 – March 2019.*





Social housing stock is an important housing option for victim-survivors of family violence. DV Vic and DVRCV welcomes the creation of 12 000 homes in 4 years in the Big Housing Build, which is a significant investment. We urge the government to extend on these commitments and meet the evidence-based target outlined in *Make Social Housing Work* to increase growth in social housing stock to meet the national average of 4.5 per cent of all households. Raising the proportion of social housing stock to 4.5 per cent requires the construction of 6 000 new public and community housing properties every year for the next 10 years, including 300 for Indigenous housing. This commitment will be a significant step towards alleviating the bottleneck in family violence crisis accommodation and expand accommodation options to keep victim-survivors safe.

Recommendation: The Strategy commits to increasing the provision of social housing in Victoria to the national average of 4.5 % of total housing stock.

Accommodation and support services for perpetrators

While DV Vic and DVRCV firmly hold the position that accommodation options for perpetrators should complement, rather than come at the expense of, housing for victim-survivors, we also believe integrated perpetrator accommodation and support programs are an important component of the social and affordable housing landscape, and an essential element of a successful Safe at Home approach to responding to family violence. If a perpetrator is removed from the family home and becomes homeless as a result, it makes them more likely to try to return home or harass victim-survivors to take them back. It is also harder to engage perpetrators in services when they are homeless. It is much safer for victim-survivors to have perpetrators monitored and engaged in programs than them being displaced into dangerous rooming houses or sleeping in their cars. It is also common for perpetrators who are excluded from the home to stay with family members. Ensuring perpetrators have access to accommodation and support services is one way of ensuring that perpetrators are monitored while held accountable for their use of violence.

There is a lack of perpetrator accommodation and support services in Victoria, which compromises victim-survivor safety. Ngarra Jarranounith Place offers one-one-on support and group activities for Aboriginal and/or Torres Strait men who use or at risk of using family violence to take responsibility, while providing a medium-term housing response. The perpetrator accommodation and support service (PASS) program is a state-wide 12-month program to support men who use violence at home. The main components are emergency accommodation, brief interventions, wrap-around support services, and brokerage. The program will be evaluated at the end of the 12 months.

DV Vic and DVRCV welcome these programs, which complement the Safe at Home approach. However, the success of the programs can be limited by a lack of exit points into long-term housing, similar to those for victim-survivors. For a successful victim-centred systemic response to family violence that pivots towards accountability for perpetrators, there should be accommodation and support options accessible by perpetrators at short notice, attached to case management and

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³⁷ Dardi Munwurro. (nd). *Ngarra Jarranounith Place*. https://www.dardimunwurro.com.au/ngarra-jarranounith.





behavioural change programs, and sufficient housing as exit points from perpetrator crisis accommodation and to support long-term housing security for perpetrators. Evaluation of perpetrator accommodation pathways and support services is also necessary to ensure they are effective in ensuring victim-survivor safety. DV Vic and DVRCV echo No To Violence's recommendations that there must be an increase in availability for accommodation services for perpetrators, and that evaluation must be built into perpetrator accommodation services. This is also aligned with Recommendation 10 of the Inquiry, which calls for funding of research in the incidence of homelessness amongst perpetrators of family violence and increase funding for programs that focus on perpetrator interventions.³⁸

Recommendation: The Strategy enables an increase in crisis and long-term accommodation and support options for perpetrators of family violence.

Question for public consultation: What are the most important features of affordable housing? (e.g. price, location, security of tenure, access to transport or daily amenities, connection to support services etc.)

DV Vic and DVRCV will provide details on the most important features of affordable housing in our response below regarding Focus area 2: Communities.

Question for public consultation: What actions will support people to find and obtain an affordable home?

DV Vic and DVRCV recognise that the lack of accommodations options for victim-survivors and perpetrators is symptomatic of the wider housing affordability crisis in Australia, and that addressing the crisis is complex. The Australian Housing and Urban Research Institute (AHURI) found that as of 2016, there was a shortage of 173 000 rental properties that would be affordable and available for low-income households.³⁹ The same research shows that 46% of low-income households are paying unaffordable rents in metro areas, while 20% are doing so in non-metro regions. The crisis has been compounded since COVID-19, particularly in regional areas. The Housing Industry Association published a housing affordability report in December 2020 that confirmed 'Housing in Australia became less affordable in the December 2020 quarter as house prices rose and average earnings declined.... Regional areas experienced a larger deterioration in affordability within than the capital cities.'⁴⁰

³⁸ Parliament of Victoria. (2021). *Inquiry into homelessness in Victoria: Final report*, p.135.

³⁹ Australian Housing and Urban Research Institute. (2019). *Changes in affordability and availability of rental housing in Australia*. https://www.ahuri.edu.au/ data/assets/pdf file/0023/54446/PES-323-Changes-in-affordability-and-availability-of-rental-housing-in-Australia.pdf

⁴⁰ Housing Industry Association. (2021). *Affordability report: a quarterly update on the affordability of housing: December 2020 quarter.* <a href="https://hia.com.au/-/media/HIA-Website/Files/IndustryBusiness/Economic/publications/affordability-report-dec20-extract.ashx?la=en&hash=B93C4C3EBD54B39582E58B67006D72D05EEE348E, p.2.





In addition to the lack of housing affordability and availability, Commonwealth income support is a barrier for people sustaining long-term housing. ⁴¹ The majority of people accessing specialist homelessness services depend on Commonwealth income support, such as Jobseeker, as their main source of income. As the National Inquiry into Homelessness found, COVID-19 has exacerbated economic hardship for individuals and households, and potentially leading to a 'new wave' of homelessness. ⁴² Increasing the rate of Commonwealth income support, and understanding the barriers to income support accessibility are therefore crucial in support people to find and obtain an affordable home. As such, DV Vic and DVRCV echo Recommendation 47 of the Inquiry that the Victorian Government advocate to the Commonwealth Government regarding an increase to the Jobseeker rate.

Recommendation: The Strategy includes advocacy to the Commonwealth Government to:

- Permanently increase the rate of JobSeeker payments.
- Reconsider the indexation of this payment to the Consumer Price Index.
- Urgently consider the barriers to income support accessibility.

Focus area 2: Communities

What actions will strengthen social and affordable housing communities?

Gender Equality and Women's Safety Initiatives

The strategy identifies social and affordable housing communities as a key focus area and commits to achieving the goal of well-designed, sustainable and safe housing that meets their needs. Being part of a community with well-established networks and connections in the local area is an important protective factor in responding to family violence, as community networks can serve as a support system to help protect victim-survivors from family violence as well as support them recover from the impacts of family violence and live safely. This reinforces our position that a Safe at Home approach must be central to the Strategy.

Urban design and community development can also be informed by strategies to prevent and intervene early in family violence. These initiatives aim to make public and community spaces safe for women and children in general, they are particularly important for victim-survivors because of the traumatic and long-lasting impacts of family violence on a person's physical and psychological wellbeing, sense of safety, identity and worldview. ⁴³ Local governments are running different women safety and gender equity programs in several municipalities in Victoria, including Darebin and Melton.

⁴¹ Parliament of Victoria. (2021). *Inquiry into homelessness in Victoria: Final report*, p.297.

⁴² Parliament of Australia. (2020). *Shelter in the storm – COVID-19 and homelessness.*https://www.aph.gov.au/Parliamentary Business/Committees/House/Social Policy and Legal Affairs/HomelessnessinAustralia/Interim Report/section?id=committees%2freportrep%2f024523%2f73827.

⁴³ Domestic Violence Victoria. (2020). *Code of Practice: Principles and Standards for Specialist Family Violence Services for Victim-Survivors,* p. 25.





Gender Equality Map

The Victorian State Government launched two pilot gender equality maps in local government areas of Darebin and Melton in October 2018. The program invited people in these local communities to drop a pin in a map and add a comment on locations where they experienced gender inequality or equality. People provided feedback related to a number of experiences, including sexist advertising in public spaces, accessible change room facilities, and access to childcare. The aim of the pilot was to help local councils better understand experiences of the community related to gender inequality in the areas where they live. The program received a positive response from the community as there were "nearly 3000 visitors to the maps over the four months it was open"⁴⁴. Currently the Map Pilot is in evaluation phase.

Innovative Lighting Design Project

The innovative lighting design project is a Victorian government initiative to test lighting design approaches to improve women's safety in public spaces. With a funding of \$200,000, this project aims to create a better understanding of "women's perceptions and experiences of safety at night, and how these can be improved through lighting." Innovative lighting designs are being developed in consultation with women and gender diverse residents, to design upgrades to lighting infrastructure at a pilot site in Preston. Preston was selected based on the findings from the government's Gender Equality Map pilot discussed above. The Equality Map project helped to identify areas where women felt particularly unsafe and the corner of Plenty Road and Tyler Street in Preston were highlighted due to the poor street lighting. Codesign workshops were held with Darebin City Council residents in partnership with Arup lighting engineers to develop innovative lighting solutions for the area. The insights from this pilot will be used to inform the development of future infrastructure projects in partnership with local councils. The project is set to be completed this year.

Melbourne City Council Safety Assessment Tool

Melbourne City Council has developed a safety assessment tool that can be used to assess how safe, welcoming, and inclusive a public facility is, particularly for community members who may be at risk of family violence. This tool can be used by community facilities and services such as aged care centre, community hub, library and a leisure facility. The assessment tool has a checklist and a number of questions related to the overall safety of the facility and some specific questions on family violence training and capacity to deal with critical incidents. The tool is available on the council website⁴⁷ and is

⁴⁴ Victorian Government. (2020). *Case study: Gender equality maps for Darebin and Melton*. https://www.vic.gov.au/case-study-gender-equality-maps-darebin-and-melton

⁴⁵ Victorian Government. (nd). *New lighting innovation set to help women feel safer in Preston*. https://www.crimeprevention.vic.gov.au/new-lighting-innovation-set-to-help-women-feel-safer-in-preston

⁴⁶ Victorian Government. (nd). *New lighting innovation set to help women feel safer in Preston.*

⁴⁷ City of Melbourne. (nd). Safe people, safe spaces – facilities assessment tool. https://www.melbourne.vic.gov.au/community/strong-communities/Pages/safe-people-safe-spaces-facilities-assessment-tool.aspx





targeted at facility managers and owners to help them ensure their facilities and services are safe, welcoming and inclusive for all.

These collaborative and flexible women safety community initiatives help create safe and equitable spaces for victim-survivors. They also help in the prevention of violence against women by challenging the community attitude towards violence, increasing awareness, and promoting and normalising gender equality in public spaces, while also encouraging urban and building design with women's and gender-diverse peoples' safety from violence at the centre.

A key element of strong social and affordable housing communities is the inclusion of family violence perspective throughout the design and delivery of housing services. Being part of strong and inclusive community networks can serve as a support system to help victim-survivors recover from violence and live safely in inclusive housing communities. These women's safety initiatives funded by the Victorian government exemplify the actions that can be taken to strengthen communities of social and affordable housing, designing them to be inclusive and adaptable to the needs of victim-survivors.

In relation to strengthening social and affordable housing communities, DV Vic and DVRCV reiterate the importance of co-design principles with victim-survivors outlined in our response to focus area 1. In addition, we recommend the application of an intersectional lens. This would also align with the Victorian Government's commitment to inclusion and equity in ensuring inclusion, safety and accountability to victim-survivors.⁴⁸

Recommendation: The Strategy includes principles of women safety initiatives, driven by the goal to improve the safety of victim-survivors and support their recovery through urban and building design.

Recommendation: The Strategy uses co-design principles and an intersectional lens, thereby aligning the Victorian Government's *Everybody Matters: Inclusion and Equity Statement*.

Focus area 3: Growth

Question for public consultation: What actions will enable and deliver growth in social housing?

Comprehensive Demand Modelling and Planning

While the introduction of the Victorian Housing Register and segmented waitlists that give priority to social housing applicants experiencing family violence had a positive effect on access to social housing for victim-survivors, waitlists for social housing are high, with over 81,000 people on the social housing wait list, including approximately 25,000 children.⁴⁹ These long wait lists make it nearly

⁴⁸ Victorian Government. (2019). *Everybody Matters: Inclusion and Equity Statement*. https://www.vic.gov.au/everybody-matters-inclusion-and-equity-statement

⁴⁹ Department of Health and Human Services (DHHS). (2019) *Housing Assistance: Additional Service Delivery Data 2018 – 19.* <u>https://www.dhhs.vic.gov.au/housing-assistance-additional-service-delivery-data-2018-19</u>, p.8; DHHS, cited in Parliament of





impossible to access any form of social housing, even for victim-survivors on the priority housing list. Our member services tell us that many victim-survivors will wait months, and sometimes years, before being offered a social housing property.

DV Vic and DVRCV welcome the announcement that the Big Housing Build will ensure homes will be allocated to 1000 victim-survivors of family violence. DV Vic and DVRCV consider it important to ensure social housing stock reflects the actual demand from victim-survivors, and suggest the Strategy look to include comprehensive demand modelling to gauge the number of social housing stock that is required for victim-survivors who do decide to leave their homes now and into the future. The modelling would account for current unmet demand, under reporting of family violence, and the effects of the chronic lack of affordable housing that is causing a backlog in the crisis accommodation system.

DV Vic and DVRCV would also like the Strategy to clearly indicate how the Big Housing Build homes will be allocated to victim-survivors, and what the pathways and options will be for victim-survivors in need of safe, secure long-term affordable housing once that allocation is exhausted. A clear plan outlining processes and pathways can complement the modelling, as well as provide accountability to ensure the Strategy meets its vision.

Recommendation: The Strategy includes action on comprehensive demand modelling for social and affordable housing across the state to determine how much additional social and affordable housing stock is truly needed to respond to family violence.

Recommendation: The Strategy clearly outlines how homes will be allocated to victim-survivors through the Big Housing Build, and pathways and options for accessing safe, secure long-term affordable housing for victim-survivors once allocations are exhausted.

Question for public consultation: What do we need to do to ensure housing supply meets the needs of people with specific support and housing needs?

An intersectional lens

DV Vic and DVRCV believe that housing must be safe and accessible for every person, and that using an intersectional lens is important to understand the structural barriers that diverse communities face to accessing safe and secure affordable housing. People from diverse communities have fundamentally unique experiences of family violence and homelessness, due to barriers such as discriminatory structures and social attitudes, which in turn creates further structural disadvantage. Due to these unique cultural and social experiences, tailored support and housing services must be available for diverse community groups, including Aboriginal people, culturally and linguistically diverse communities, LGBTIQ+ communities, people with disability and people experiencing mental

Victoria. (2018). Inquiry into the Public Housing Renewal Program. https://www.parliament.vic.gov.au/923-lsic/inquiry-into%3F

⁵⁰ Victorian Government. (2021). *Establishing a 10-Year Strategy for Social and Affordable Housing: Sector Consultation Paper*, p. 17.





health issues. An intersectional approach embedded throughout the 10-Year Social and Affordable Housing Strategy is essential to ensure that housing system and supply does not discriminate and is inclusive of the needs of every person in Victoria.

Recommendation: The Strategy embeds an intersectional approach to ensure people who experience discrimination have access to specific support and housing needs.

Focus area 4: Partnerships

Addressing Economic Abuse

In addition to ensuring the victim-survivor co-production of the social and affordable housing system, DV Vic and DVRCV would like the Strategy to include provisions for actions that address economic abuse to support victim survivors to remain in their homes, or accessing safe and affordable homes. The RCFV dedicated a chapter to financial security (chapter 21) with 15 recommendations. A report by WEstjustice found that up to 99% of women victim-survivors presenting at specialist family violence services have experienced economic abuse. A study by the Economic Abuse Reference Group found that '[Economic abuse] makes it impossible for [victim-survivors] to navigate the day-to-day because of crushing debt, bad credit records, unpaid fines and bad tenancy records, most of which are inherited from the violent partner'. Without financial security, victim-survivors cannot sustain their housing. Addressing economic abuse is critical for victim-survivors' financial security, recovery and their ability to make genuine choices in their lives, including the ability to leave a violent relationship and find a safe and affordable home. Therefore, DV Vic and DVRCV posit that partnerships between the social housing and economic security sectors should feature in the Strategy.

Recommendation: The Strategy include partnerships and provisions that address economic abuse to support victim-survivors to remain in their homes, access social housing or other forms of safe and affordable housing.

A shared understanding of family violence

As a result of the RCFV, the implementation of key reforms such as the Multi-Agency Risk Assessment and Management Framework (MARAM), Family Violence Information Sharing Schemes (FVISS) and Child Information Sharing Scheme (CISS), have had significant implications for services, including specialist homelessness services. To ensure consistent and collaborative practice in assessing and managing family violence risk, it is crucial to have a shared understanding of family violence and clear

⁵¹ WEstjustice. (2018). *Restoring financial safety: collaborating on responses to financial abuse.* WEstjustice. https://www.westjustice.org.au/cms_uploads/docs/180831restoring_financial_security_report_final_print.pdf

⁵² Economic Abuse Reference Group. (2020). *Responding to financial abuse full report: community, business and government responses to the financial impacts of family violence in Australia*. https://apo.org.au/sites/default/files/resource-files/2020-03/apo-nid303785.pdf, p.4





pathways to housing for people who have experience family violence and who present to specialist homelessness services.

While work is underway to ensure MARAM is integrated into pre-service qualifications for professionals who work in prescribed organisations,⁵³ ensuring other professionals working in housing sector, such as real estate agents also have a shared understanding of family violence. You can refer to our letter in relation to the Review of Real Estate Education regulations. As housing providers and landlords, real estate agents may be one of the first to become aware of family violence and are well-placed to identify family violence, refer to appropriate services, and support victim-survivors accessing and/or sustaining safe and secure tenancies. Having a shared understanding of family violence enables all individuals working in the housing system to respond effectively to victim-survivors.

Recommendation: The Strategy includes the development of strengthened referral pathways and education and training for professionals working in specialist homelessness services and real estate sector to identify family violence, refer to appropriate services, and support victim-survivors in accessing and/or sustaining safe and secure tenancies.

Question for public consultation: How can we engage with you as we develop new initiatives over the course of this strategy?

Collaboration

DV Vic and DVRCV welcome further opportunities to engage with the Victorian Government and Homes Victoria on the Strategy. As the peak body for specialist family violence services for victim-survivors in Victoria, DV Vic and DVRCV have a suite of direct member engagement mechanisms which can be utilised for further consultation with senior managers, team leaders, and practitioners on the frontline of service delivery. Through collaboration and clear transparent communications, we look forward to working towards a future where every person in Victoria has access to a safe, affordable and appropriate home.

Recommendation: Collaborate with DV Vic and DVRCV to work towards a future where every person in Victoria has access to a safe, affordable and appropriate home.

Conclusion

DV Vic and DVRCV would like to thank the Victorian Government and Homes Vic on the work they have done on the Strategy to date and look forward to working with them and our partners in the

⁵³ Victorian Government. (2020). *Report on the implementation of the Family Violence Risk Assessment and Management Framework.* Victorian Government.

https://www.parliament.vic.gov.au/file uploads/Report on the implementation of the Family Violence Risk Assessmen t and Management Framework 2019-20 v2 W01zCs5H.pdf, p. 41





community sector to continue to support victim-survivors in accessing and maintain safe, affordable and appropriate homes.