



Draft National Plan to End Violence against Women and Children 2022-2032

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Introduction

Housing for the Aged Action Group (HAAG) is the only Australian organisation of its type specialised in the housing needs of older people. The organisation has over 600 members actively campaigning for housing justice. Established over 30 years ago as a grassroots movement, the organisation has established a robust service delivery arm in Victoria and has a strong presence in advocacy for older people experiencing housing and homelessness related issues across the country. During the 2020-21 financial year, HAAG supported over 150 older people into safe and secure housing and made over 600 referrals.¹

In 2016 HAAG was funded by the Wicking Trust (a philanthropic organisation) to conduct research in every state and territory to understand the depth and breadth of housing and homelessness issues of older people. In consultation and engagement with services, people with lived experience, advocates and peak advocacy bodies across Australia, the research project produced a number of reports on the housing issues of older people.²

OWN NSW is a community-based organisation that is run by older women, for older women. Established in 1987, OWN aims to promote the rights, dignity and wellbeing of older women. We encourage mutual support and friendship amongst our members and work to foster a positive attitude toward ageing. Members of our organisation are older women who have a strong interest in housing affordability, ending violence against women and ensuring economic wellbeing.

We welcome the opportunity to provide input into the Draft National Plan to End Violence Against Women and Children 2022-2032 (the Draft Plan/National Plan).

This submission is endorsed by Domestic Violence NSW (DVNSW). DVNSW is the peak body for specialist domestic and family violence services in New South Wales.

Recommendations

1. Identify access to social and affordable housing as a focus area under each pillar of the National Plan and include immediate and significant investments by federal, state and territory governments, accompanied by clear targets and outcome measures, to deliver an adequate supply of new social and affordable housing as a preventative measure and to ensure victim-survivors fleeing violence can recover and thrive.
2. Address the housing needs of older women across each pillar of the National Plan, noting that experiences of family and domestic violence may be current or in the past with associated implications.
3. Incorporate clear measures in relation to elder abuse of older women in different housing settings, including the direct links between their abuse and homelessness.

¹ Housing for the Aged Action Group, Annual report 2020-21, 2021, accessible at: <https://www.olderrenters.org.au/publications/annual-report-2020-21>

² See further: Housing for the Aged Action Group, Ageing on the Edge National Action Project, accessible at: <https://www.olderrenters.org.au/ageing-edge-national-action-project>

4. Address the disproportionate negative impacts of social welfare regulations and policies including increasing social security payments and scrapping policies, such as, the Cashless Debit Card (CDC).

1. Older women and increased risk of homelessness

Recommendations

1. Identify access to social and affordable housing as a focus area under each pillar of the National Plan and include immediate and significant investments by federal, state and territory governments, accompanied by clear targets and outcome measures, to deliver an adequate supply of new social and affordable housing as a preventative measure and to ensure victim-survivors fleeing violence can recover and thrive.
2. Address the housing needs of older women across each pillar of the National Plan, noting that experiences of family and domestic violence may be current or in the past with associated implications.

Older women are the fastest growing cohort of people experiencing homelessness in Australia and unlikely to seek support from homelessness services.³ Single older women are amongst the most marginalised groups in terms of their access to safe, affordable housing that is well located and suitable for their needs.⁴

Due to the hidden nature of women's homelessness and the statistical methods used to count homelessness, existing data sets understate the true extent of the issue, particularly for older women experiencing family or domestic violence.⁵ The *At Risk: Understanding the population size and demographics of older women at risk of homelessness in Australia* report estimates that over 405,000 women over 45 years were at risk of homelessness in Australia.⁶

Risk factors for older women to experience homelessness, in addition to family and domestic violence, include being single, renting, living alone, decades of economic disadvantage, experiencing a crisis such as loss of a relationship and other systemic and structural issues such as lack of social and affordable housing. As a result, older women are likely to remain in untenable, abusive relationships to avoid experiencing or being at risk of homelessness. We also know via our conversations with women around the country, that many women still feel the financial impacts of

³ Australian Human Rights Commission, *Older Women's Risk of Homelessness: Background Paper*, 2019, accessible at:

https://humanrights.gov.au/sites/default/files/document/publication/ahrc_ow_homelessness2019.pdf

⁴ Homelessness NSW, Mercy Foundation, *et al*, *A Plan for Change: Homes for Older Women*, 2016, accessible at: <https://homelessnessnsw.org.au/wp-content/uploads/2021/03/Feb-2016-A-Plan-For-change-homes-for-older-women.pdf>

⁵ Australian Human Rights Commission, *Older Women's Risk of Homelessness: Background Paper*, 2019, accessible at:

https://humanrights.gov.au/sites/default/files/document/publication/ahrc_ow_homelessness2019.pdf

⁶ Housing for the Aged Action Group, *At Risk: Understanding the population size and demographics of older women at risk of homelessness in Australia*, 2020, accessible at:

https://www.olderrenters.org.au/sites/default/files/at_risk_final_report_web.pdf

family violence 20 years or more after their relationships ended with associated implications for their housing.

Access to safe and affordable housing must be a key part of the next National Plan. Although the *Statement from Delegates - 2021 National Summit on Women's Safety* identifies affordable, accessible long-term housing and inclusive, culturally appropriate crisis accommodation as a priority, the Draft Plan does not adequately address this issue or outline how increased access to safe and affordable long-term housing will be delivered. This includes immediate and significant investments by federal, state and territory government to deliver an adequate supply of new social and affordable housing as a preventative measure and to ensure victim-survivors fleeing violence can recover and thrive. Emergency accommodation, transitional housing and long-term housing are all critical.⁷

There are a few brief references to older women in the Draft Plan. The issue of older women at risk of homelessness has not been meaningfully addressed over the years with clear commitments, targets and outcome measures to address these inequities. The opportunity presented with developing the next National Plan should be utilised to ensure that there are clear commitments, targets and outcome measures to address these issues that go beyond simple recognition.

The Draft Plan highlights the need to ensure women and children escaping violence have safe and secure housing across the spectrum from crisis to longer term, sustainable social housing and linkages between emergency accommodation, transitional housing and long-term housing to support women through the continuum of housing needs through to the recovery stage. These acknowledgments from the government should be followed by an increase in investment to build social and affordable housing to meet the growing demand.

In addition, the Draft Plan highlights supporting victim-survivors to find safe housing options in the private market where they have capacity to do so. It is likely that a considerable proportion of older women leaving violence are relying on social security payments. People aged 55 years and over form the largest cohort receiving the JobSeeker payment.⁸ The 2021 Rental Affordability Snapshot surveyed over 74,000 rental listings across Australia and there were only three properties affordable to single people on Jobseeker payment.⁹ Only a small proportion of older women will have capacity to transition to private market and there is a clear need for a significant increase in social and affordable housing.

It is important that *ad hoc* references to older women throughout the Draft Plan are clarified by identifying how Pillars 1-4 will respond to the specific needs of older women. This should also include a discussion, particularly under Pillar 4, in relation to the impact of historical experiences of violence women have experienced and the long-term impact as they age.

⁷ Statement from Delegates - 2021 National Summit on Women's Safety, 2021, accessible at: <https://az659834.vo.msecnd.net/eventsairaeuprod/production-regonsite-public/e626677d4b4c4a5ebfe33a68b05bdd6b>

⁸ Department of Social Services (Cth), DSS Payment Demographic Data, accessible at: <https://data.gov.au/dataset/ds-dga-cff2ae8a-55e4-47db-a66d-e177fe0ac6a0/details?q=>

⁹ Anglicare Australia, Rental Affordability Snapshot (RAS) 2021, accessible at: <https://www.anglicare.asn.au/wp-content/uploads/2021/05/rental-affordability-snapshot-national-report.pdf>

Su's story below demonstrates how older women with a history of domestic violence and abuse are at increased risk of homelessness and are often left with limited superannuation due to carer responsibilities and working in largely feminised and low paid sectors.

Case study

Su is a 67-year-old woman who is currently living in transitional housing. She was physically and sexually abused when she was a child. She was controlled by men and as a consequence became fearful of them. There were no interventions to prevent this physical and sexual abuse.

Su got married when she was 18 years old and hoped that her life would be different. As the marriage was abusive, she left with her young son. This was the first time she experienced homelessness. With no money or access to financial support, little support from her family and friends and no housing options, her only option was a women's shelter. Relationships that followed were abusive, and she confused violence and sexual assault with intimacy. The assault and abuse within her relationships were a cycle she could not get out of until recently.

Su worked in the care sector, where salaries were low, and as a result, her superannuation was low. After working for nearly 50 years, Su did not have sufficient savings to support herself and manage her expenses. In December 2020, Su drew on her superannuation and savings to pay rent and manage other expenses. Sydney housing prices exceeded her pension. Her current pension is \$1,091 per fortnight, and she could not afford to live in the same area.

She was ready to live in her car when she found transitional housing. Su felt that it was the first time that she was able to step out of survival mode and work through the trauma she had survived.

Su is still waiting for a permanent housing option to become available to her.

2. Elder abuse of older women

Recommendation

- Incorporate clear measures in relation to elder abuse of older women in different housing settings including the direct links between their abuse and homelessness.

Unfortunately, gender-based violence and abuse amongst older women can be overlooked in policy and practice. When women become older, their gender seems to be forgotten or becomes hidden.¹⁰ Gender-based violence and abuse of older people remain separated in research and practice, making the problem of violence against older women invisible on the policy front with few specific interventions.¹¹ It is critical that the National Plan addresses elder abuse of older women as

¹⁰ See: B Penhale, Understanding Gender-Based Violence, 2021, accessible at: <https://www.researchgate.net/publication/349444045>

¹¹ Older Women's Network, Abuse of Older People a Serious Public Health & Societal Problem, accessible at: <https://ownnsw.org.au/our-work/elder-abuse/>

some of the policy, practice and legislative interventions are different to those in relation to domestic and family violence.

Elder abuse of older women impacts on their housing security in a number of ways. Older women are also at risk experiencing family, domestic and sexual violence, and for some this abuse is a continuation of a lifelong pattern of family violence, including sexual assault.¹²

Financial abuse of older women can occur where an adult child decides to take a parent's assets in order to pay off their own debts, invest in their own business venture or otherwise spend money that they expect to inherit but does not belong to them yet. It can also occur when adult children stay at home or return home and use their parent's money or assets to finance their own lifestyle using coercive or fraudulent means.¹³

For older women who own their own home, we know from research that adult children can have 'inheritance impatience' therefore financially abuse them in order to obtain the house. This can result in older women falling out of home ownership into homelessness. Older women may sell their house and move into with their adult children, or into a granny flat, often built with the proceeds of the sale. This may lead to homelessness, if the relationship breaks down and there is no legal arrangement to protect them.

National Ageing Research Institute (NARI) research into the outcomes of interventions into elder abuse of older people recommended a review of affordable housing options for older people and adult children to address the need for accommodation options to escape abuse.¹⁴ The types of abuse included psychological abuse (63%) and financial abuse (62%) physical abuse (16%) and social abuse (11%), with many clients experiencing more than one type of abuse.¹⁵

Case study

Beryl*now aged 76 is a cancer survivor. After recovering from a cancer diagnosis, she knew it was time to separate from her husband. She transferred ownership of the family home to her son and made arrangements to move in with her daughter. Unfortunately, those plans fell through. Beryl wanted to move back to the family home but found her son increasingly hostile.

Beryl then received devastating news that her ex-husband had passed away. Both her son and daughter blamed Beryl for his death. She found she had nowhere to go as one-by-one, options with friends and family dried up.

Not knowing where else to turn for help, Beryl walked into Centrelink and explained her situation. Instead of taking her into a cubicle. She stated that "the man behind the counter boomed back all

¹² Australian Human Rights Commission, Statement on the National Summit on Women's Safety, 2021, accessible at: <https://humanrights.gov.au/about/news/statement-national-summit-womens-safety>

¹³ Seniors Rights Victoria, Summary of submission to the Royal Commission into Family Violence – June 2015, accessible at: <https://seniorsrights.org.au/wp-content/uploads/2021/03/2015June1PolicyFamilyViolenceRCSummary.pdf>

¹⁴ National Ageing Research Institute (NARI), Elder Abuse in Victoria: An Analysis Of 7 Years Of Data, 2020, accessible at: <https://www.nari.net.au/Handlers/Download.ashx?IDMF=1d415420-bc6f-465e-bf66-d41a80e37835>

¹⁵ Ibid

her personal information so that others could hear. He slipped her a piece of paper with details for a soup kitchen. The whole experience left her feeling humiliated”.

She had heard of government housing but had been told by a case worker she didn't “have enough reasons” to get a place. Instead, she was provided with information about options that were unfit for her, including share houses. Eventually, Beryl broke down and started listing all her health concerns to a social worker. Up until then, no-one had explained that she could put the multiple medical issues on her priority application for social housing.

Beryl was offered a home in a block for women aged 55 and over with a community housing provider. She has been living there five years now and shudders to think what would have happened, had she not found safe and secure long-term housing.

**Name has been changed for privacy and consent of the person was obtained to share the case study*

The Australian Law Reform Commission's *Elder Abuse— A National Legal Response* report found that older women are significantly more likely to be victims of elder abuse than older men, and most abuse is intergenerational (ie, involving abuse of parents by adult children), with sons being perpetrators to a greater extent than daughters.¹⁶ For some women, the experience in older age of family violence, including sexual assault, represents the continuation of a lifelong pattern of spousal abuse.¹⁷

The pandemic has had a disproportionate impact on older women. From our service and community sector experience we know that lockdowns, isolation from close networks, and the impact of economic hardship on both older women and their adult children have increased violence and abuse.

There are numerous reports detailing elder abuse taking place in aged care and related residential settings. The *Royal Commission into Aged Care Quality and Safety* report highlights that abuse is also perpetrated against people receiving aged care in the home, especially given there are no other staff members around to identify and report potential abuse.¹⁸ In addition, elder abuse experienced at the hands of close family members, friends and community is likely to be significantly underreported and needs to be addressed through tangible action, including increasing housing support.

Disappointingly, there are only two references to elder abuse in the entirety of the Draft Plan, including in the definition of domestic and family violence. There are no targets or measures specifically addressing elder abuse of older women across the four pillars or clarity around the

¹⁶ Australian Law Reform Commission, *Elder Abuse— A National Legal Response*, 2017, accessible at: https://www.alrc.gov.au/wp-content/uploads/2019/08/elder_abuse_131_final_report_31_may_2017.pdf

¹⁷ Ibid

¹⁸ Royal Commission into Aged Care Quality and Safety, *Final report: Care Dignity and Respect*, 2021, accessible at: https://agedcare.royalcommission.gov.au/sites/default/files/2021-03/final-report-volume-2_0.pdf

intersection between this Draft Plan and the *National Plan to Respond to the Abuse of Older Australians (Elder Abuse) 2019–2023*.¹⁹

It is concerning that the Draft Plan refers to some intersectional policies including *Australia's Disability Strategy 2021-2031* with no reference to current mechanisms, policies or strategies on elder abuse. There is a clear need for the National Plan to incorporate clear measures in relation to elder abuse of older women in different settings including the direct links between their abuse and homelessness.

3. Income support payments and violence against women

Recommendation

- Address the disproportionate negative impacts of social welfare regulations and policies including increasing social security payments and scrapping policies, such as, the Cashless Debit Card (CDC).

The relationship between poverty caused by social security payments below the poverty line and poor wellbeing among recipients has long been established. COVID-19 pandemic has caused an increase in the frequency and severity of domestic violence that occurs in Australia.²⁰

Pension and government allowances are the main sources of income for 56.9% of older people.²¹ People aged 55 years and over form the largest cohort receiving the JobSeeker payment. Income support payments are significantly inadequate to pay for rising rents across the country and manage other essential expenses. This is particularly the case for older women over 55 receiving the Jobseeker payment.

The Federal Treasury *Retirement Income Review Final Report* found that for many who retire involuntarily due to job-related reasons, the adequacy of their living standards before Age Pension eligibility age depends on the level of the JobSeeker Payment. Renters and involuntary retirees experience higher levels of financial stress and poverty than the working-age population.²²

Recent reports highlighted that woman were coerced into withdrawing superannuation during the pandemic. The Australian Institute of Superannuation Trustees (AIST) says if statistics on how many

¹⁹ Council of Attorneys General, *National Plan to Respond to the Abuse of Older Australians (Elder Abuse) 2019–2023*, accessible at: <https://www.ag.gov.au/sites/default/files/2020-03/National-plan-to-respond-to-the-abuse-of-older-australians-elder.pdf>

²⁰ J. Andina, M. Tanara and D. Wirahman, *The Correlation between the Covid-19 Pandemic and Domestic Abuse Against Women: A Comparative Study Between Australia, Indonesia, and India*, Vol. 1 No. 2 (2020): *COVID-19 in International Relations Perspective: Impact on Global Dynamics*, accessible at: <https://journal.unpar.ac.id/index.php/Sentris/article/view/4291>

²¹ Australian Bureau of Statistics, *4430.0 – Disability, Ageing and Carers, Australia, 2018*, accessible at: <https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release>

²² The Department of Treasury, *Retirement Income Review Final Report, 2020*, accessible at: https://treasury.gov.au/sites/default/files/2020-11/p2020-100554-00bkey-observations_0.pdf

women experienced financial abuse since the start of the pandemic are applied to the early release scheme, it suggests more than 70,000 were the victims of coercion.²³

Women who are forced into Cashless Debit Card (CDC) report that it is traumatising in the way that they felt when they were living in an abusive relationship because their income is controlled so tightly.²⁴ There is growing evidence to demonstrate the insidious nature of the regulations and operational aspects of CDC, forcing some people into homelessness as a result of the length of time it takes for approval of payments, and the delay in payments.²⁵

At the Older Women's Conference in 2018, Older Women's Network unanimously rejected the expansion and rollout of the CDC. There is no direct evidence linking a reduction in domestic and family violence to the implementation of CDC.²⁶ With 20% limit on cash transactions, concerns have been raised in relation to significantly limiting a person's ability to leave violent relationships.²⁷

The Parliamentary inquiry into *Social Security (Administration) Amendment (Income Management to Cashless Debit Card Transition) Bill 2019 [Provisions]* dissenting reports reiterated that there was a lack of evidence regarding the efficacy of the CDC and it was having adverse impacts on government commitments under the Closing the Gap targets as well as potential impacts on increasing violence against women.²⁸

We therefore recommend that the CDC be made voluntary for only those who wish to continue to be on the scheme. Every effort should be made to ensure that government policies do not contribute to housing stress and homelessness.

A holistic approach to preventing domestic and family violence should include addressing the disproportionate negative impacts of social welfare regulations and policies including increasing social security payments and scrapping policies such as the CDC.

²³ The Sydney Morning Herald, Katina Curtis, 'A perfect storm': Up to 70,000 women may have been coerced into withdrawing super, 21 February 2022, accessible at: <https://www.smh.com.au/politics/federal/a-perfect-storm-up-to-70-000-women-may-have-been-coerced-into-withdrawing-super-20220217-p59xac.html>

²⁴ Hidden Costs: An Independent Study into Income Management in Australia, February 2020, accessible at <https://static1.squarespace.com/static/5bff47d1da02bc49ad4e890b/t/5e54c6934eb2985cbbf830a5/1582614180484/Hidden+Costs+Report+-+FINAL.pdf>

²⁵ See further: No Cashless Debit Card (Facebook page), accessible at: <https://www.facebook.com/notowelfarecard/posts/this-shows-how-indue-controlling-money-can-render-anyone-homeless-in-this-case-o/2452860611618498/>

²⁶ AWAVA, Submission to the Senate Inquiry into the Social Security (Administration) Amendment (Income Management and Cashless Welfare) Bill 2019, 2019, accessible at: <https://awava.org.au/wp-content/uploads/2019/05/AWAVA-submission-on-the-Cashless-Debit-Cards-Trials.pdf>

²⁷ Ibid

²⁸ Community Affairs Legislation Committee, Social Security (Administration) Amendment (Income Management to Cashless Debit Card Transition) Bill 2019 [Provisions], 2019, accessible at: [https://parlinfo.aph.gov.au/parlInfo/download/committees/reportsen/024361/toc_pdf/SocialSecurity\(Administration\)Amendment\(IncomeManagementtoCashlessDebitCardTransition\)Bill2019\[Provisions\].pdf;fileType=application%2Fpdf](https://parlinfo.aph.gov.au/parlInfo/download/committees/reportsen/024361/toc_pdf/SocialSecurity(Administration)Amendment(IncomeManagementtoCashlessDebitCardTransition)Bill2019[Provisions].pdf;fileType=application%2Fpdf)