

National Housing Infrastructure Facility Submission

Prepared by Aboriginal and Torres Strait Islander Housing Queensland

6 September 2024



Aboriginal and Torres Strait Islander
Housing Queensland

About Our Organisation

Aboriginal and Torres Strait Islander Housing Queensland (ATSIHQ) is the peak body for First Nations housing in Queensland. Established in 2021, we are more than an advocacy organisation. We are a leading Australian domestic think tank. A policy creator. An advisor. A strategist. A collaborator and partner. We are content experts on matters that impact First Nations housing, accommodation and homelessness.

Background

The government is making subordinate legislative amendments to increase funding for the National Housing Infrastructure Facility (NHIF), administered by Housing Australia. These amendments deliver a 2024–25 Budget announcement to target a \$1 billion increase to the NHIF towards crisis and transitional accommodation for women and children experiencing family and domestic violence, and youth.

Treasury is seeking stakeholder views on:

- draft amendments to the *Housing Australia Investment Mandate Direction 2018*
- draft Explanatory Statement
- specific policy parameters.

This ATSIHQ Submission

This ATSIHQ submission identifies challenges in the current *Housing Australia Investment Mandate Direction 2018* and provides recommendations for Treasury.

When preparing this submission, ATSIHQ recognises that:

- the additional \$1 billion increase to the NHIF is targeted towards crisis and transitional accommodation for women and children experiencing family and domestic violence and youth.
- there are no plans to set-aside or prioritise any of this additional \$1 billion increase for Aboriginal and Torres Strait Islander targeted projects.

Our Recommendations

ATSIHQ believes that the *Housing Australia Investment Mandate Direction 2018* could achieve crisis and transitional accommodation for women and children experiencing family and domestic violence, and youth AND significant crisis and transitional housing outcomes for Aboriginal and Torres Strait Islander people.

The following are our recommendations to Treasury:

Consultation Questions

1. What are the merits of targeting additional funding towards crisis and transitional accommodation as part of the broader mix of acute and social housing?

Policy Question	
Challenges	ATSIHQ Recommendations
<p>Narrow focus. These funds are earmarked for safe and accessible accommodation for women and children experiencing family and domestic violence and youth.</p> <p>The \$1billion increase contains no ring fencing for Aboriginal and Torres Strait Islander cohorts who are disproportionately experiencing family and domestic violence and who are at risk of homelessness. They need urgent prioritisation.</p>	<ol style="list-style-type: none">1. ATSIHQ recommends that <i>Housing Australia Investment Mandate Direction 2018</i> be amended to name and prioritise Aboriginal and Torres Strait Islander cohorts.2. ATSIHQ recommends that <i>Housing Australia Investment Mandate Direction 2018</i> be amended to quarantine 30% of the \$1billion increase to target dedicated Aboriginal and Torres Strait Islander family and domestic violence and youth housing projects / bids – which are led by First Nations organisations.3. ATSIHQ recommends that <i>Housing Australia Investment Mandate Direction 2018</i> be

Any housing related investment mandate must support Aboriginal and Torres Strait Islander cohorts that rely on these investment mandates and associated measures to drive real change.	supported by a program funding guide that outlines eligibility requirements, application assessment, decision process, written agreements and any associated grant policies including monitoring and enforcement mechanisms.
--	--

2. Are the definitions for crisis and transitional accommodation in the draft Investment Mandate amendments appropriate, and separately, are the definitions of the cohorts of women and children, and youth appropriate?

Definition Question	
Challenges	ATSIHQ Recommendations
<p>Poor definitions. The draft currently defines both crisis and transitional accommodation as short-term.</p> <p>A distinction between both categories is important. However, transitional housing should not be seen as short-term because it is an important housing tenure between crisis accommodation and long-term housing and must be viewed as 'medium-term' housing.</p> <p>The age of 'youth' needs be redefined to capture younger people in Aboriginal and Torres Strait Islander community who are at risk of homelessness.</p> <p>No specific provisions are mentioned for projects / bids that benefit Aboriginal and Torres Strait Islander women and their families. This is a significant limitation in the draft.</p>	<ol style="list-style-type: none"> 4. ATSIHQ recommends that <i>Housing Australia Investment Mandate Direction 2018</i> be amended to redefine transitional accommodation as 'medium-term' accommodation. 5. ATSIHQ recommends that <i>Housing Australia Investment Mandate Direction 2018</i> be amended to redefine and lower the age of youth definition to include 15-years. 6. ATSIHQ recommends that <i>Housing Australia Investment Mandate Direction 2018</i> be amended to include targets to attract First Nations led housing projects / bids that deliver meaningful outcomes for Aboriginal and Torres Strait Islander women, children and youth.

3. Is the existing list of eligible project proponents for NHIF (Critical Infrastructure) and NHIF (Social and Affordable Housing) appropriate for the expansion of the NHIF for crisis and transitional accommodation? Are there any other project proponents that should be considered?

Eligibility Questions	
Challenges	ATSIHQ Recommendation
<p>Expansion needed. The existing list of eligible project proponents for the NHIF (Critical Infrastructure) and NHIF (Social and Affordable Housing) are too restrictive.</p> <p>The majority of organisations with expertise in supporting women and children escaping domestic and family violence or in supporting youth are small organisations often incorporated associations or co-operative societies.</p> <p>Eligibility needs to include others organisations who work in crisis and transitional accommodation support roles.</p>	<ol style="list-style-type: none"> 7. ATSIHQ recommends that <i>Housing Australia Investment Mandate Direction 2018</i> be amended to include specialist non-profit organisations and charities (like Aboriginal and Torres Strait Islander community housing providers) as eligible project proponents as they often work directly with victims / survivors of domestic and family violence and at-risk youth.

4. How could project proponents use this funding mix, and how could project finance be structured to draw on both grants and concessional loans?

Funding Question	
Challenges	ATSIHQ Recommendation
<p>Greater flexibility is needed. The 'value-for-money' criteria can be problematic when applying this criteria to rural and remote housing projects / bids.</p> <p>Similarly, 'value-for-money' rarely takes into consideration the different types of housing and building costs associated with different rural or remote locations, or locations that have different sub-soil geology or significant seasonal changes.</p>	<p>8. ATSIHQ recommends that <i>Housing Australia Investment Mandate Direction 2018</i> be amended to include measurements that add greater weighting to Aboriginal and Torres Strait Islander projects / bids from rural and remote locations during the bid assessment process.</p>

5. What impacts would a time limit for state and territory funding allocations have on project proponents or projects that would come forth for the funding. What are the benefits and unintended adverse consequences?

Time Question	
Challenges	ATSIHQ Recommendations
<p>Time limits. Imposing a 12-month time limit on state and territory funding allocations has its benefits and would bring projects to fruition quickly.</p> <p>There is a potential unintended consequence, particularly for rural and remote areas. These regions often face higher operating costs and longer project timelines due to logistical challenges, workforce availability and supply constraints.</p>	<p>9. ATSIHQ recommends that <i>Housing Australia Investment Mandate Direction 2018</i> be amended to include targets for housing bids / projects from rural and remote areas.</p> <p>10. ATSIHQ recommends that <i>Housing Australia Investment Mandate Direction 2018</i> be amended to give housing projects in rural and remote areas a two-year time limit to be completed.</p>

Conclusion

Aboriginal and Torres Strait Islander Housing Queensland (ATSIHQ) welcomes the Federal Government's commitment to increasing the National Housing Infrastructure Facility (NHIF) by \$1 billion, specifically targeting crisis and transitional accommodation for women, children, and youth.

We are seeking the adoption of all 10 recommendations in this submission as we strongly feel that if incorporated into an amended *Housing Australia Investment Mandate Direction*, that it will make it a better instrument while still meeting the overall intent of the funding.

We welcome an opportunity to work with Treasury on finalising this important investment mandate so that it achieves benefits for all Australians – including First Nations people.

Yours sincerely



Neil Willmet
 Chief Executive Officer
 Aboriginal and Torres Strait Islander Housing Queensland
neil.willmett@housingqueensland.com.au

Submission Contact Details

Aboriginal and Torres Strait Islander Housing Queensland
Ground Floor, 63 George Street
Brisbane QLD 4000

www.housingqueensland.com.au

GPO Box 773, Brisbane QLD 4001