



26 March 2018

Minister Mick Gentleman, MLA
Minister for Planning and Land Management
GPO Box 1020
Canberra ACT 2601

Submitted via email: Terrplan@act.gov.au

Dear Minister Gentleman,

Thank you for the opportunity to provide feedback to your Ministerial Housing Choices discussion paper on behalf of women and girls in Canberra.

YWCA Canberra has a history of providing housing support to Canberrans through our transitional housing, affordable housing and supportive tenancy services. Through our transitional housing services in 2016-17, we have supported a total of 188 clients — 119 women, 137 children (aged 0-15 years old) and 24 young people (aged 16-25 years old). In our two affordable houses for older women — Betty Searle House in Chapman and Lady Heydon House in Spence — we have supported 14 older women (aged 43-90 years old). For women who meet the income eligibility criteria under the National Rental Affordability Scheme, we also provide two affordable housing properties at the Eclipse Apartments in Bruce.¹

Our supportive tenancy service has supported 56 people in private rental dwellings and 83 clients in public housing through a consortium between Woden Community Service, Belconnen Community Service and YWCA Canberra. YWCA Canberra is committed to providing appropriate housing solutions to women, their families and the broader community to enable them to enjoy a higher quality of living.²

Appropriate, affordable and stable housing is essential to the wellbeing of both individuals and community. For women, housing insecurity and homelessness is a significant social policy issue. As noted by the Australian Women Against Violence Alliance (AWAVA) and the Equality Rights Alliance (ERA), domestic and family violence is the single largest driver for people seeking housing and homelessness support.³ In 2016-17, women were the largest group of people (at 72,000) who sought homelessness services because of family and/or domestic violence.⁴

¹ YWCA Canberra, *Annual Report 2016-17*, pp. 31, 33.

² YWCA Canberra, *Annual Report 2016-17*, p.34.

³ Australian Women Against Violence Alliance and Equality Rights Alliance, Letter to Prime Minister, Federal, State and Territory Treasurers and Ministers for Housing, Women and the Prevention of Family Violence: *A Gender Responsive National Housing and Homelessness Agreement*, October 2017, accessed at <https://www.equalityrightsalliance.org.au/a-gender-responsive-national-housing-and-homelessness-agreement/>, on 15 March 2018.

⁴ Australia's National Research Organisation for Women's Safety (ANROWS), *Fast Facts: Impacts of Family, Domestic and Sexual Violence 2018* citing Australian Institute of Health and Welfare, *Family, domestic and sexual violence in Australia 2018* (Cat. No. FDV 2), Canberra: AIHW, 2018.

There is a clear need for a gender-responsive policy approach to address housing and homelessness.⁵ In the ACT in 2016-17, women accounted for more than half of those people accessing specialist homelessness services.⁶ Further, 38 per cent of clients (compared with 21 per cent nationally) sought specialist homelessness services in the ACT due to relationship/family breakdown.⁷ For these reasons, YWCA Canberra continues to call for targeted housing and homelessness funding to ensure women can access specialised support services.

YWCA Canberra advocates for housing models which address the multiple housing needs of women. Women are not a homogenous group, and as such, housing models need to reflect the diversity of their needs throughout different stages of their lives. Several groups of women experience high rates of housing insecurity and homelessness. This submission will focus on four specific groups of women in the ACT and their needs in relation to developing best practice in housing design. These groups include older women, women with disability, Aboriginal and Torres Strait Islander women and one-parent families headed by females. Homelessness Australia have identified older women, women with disability and Aboriginal and Torres Strait Islander women as being vulnerable to significant risk of housing stress and homelessness.⁸ Whilst this submission is focused specifically on these four groups, YWCA Canberra emphasises the need for urban and housing planning to adopt a gendered lens to address the specific needs of all women, and in particular, those fleeing domestic and family violence.

In addition to this, YWCA Canberra calls for the development and implementation of innovative housing models in the ACT which leverage private investment for the provision of affordable rental housing — such as the example in Victoria, Launch Housing (formerly HomeGround Real Estate). Housing models such as Launch Housing have been recommended to governments seeking to reduce pressure on public and social housing.⁹ The model has been successful because it allows landlords to claim tax concessions, irrespective of the affordable housing rental rate.¹⁰

YWCA Canberra also calls for the ACT Government to support ACT registered community housing organisations to provide affordable rental properties. To complement existing Commonwealth taxation incentives (capital gains tax incentive and tax deduction for the gap between full market rent and affordable housing rent) YWCA Canberra recommends that landlords (who lease their properties to fellow Canberrans at 75 per cent or less of market rates through ACT registered community housing providers) should receive a reduction of ACT land tax.

⁵ Australian Women Against Violence Alliance and Equality Rights Alliance, Letter to Prime Minister, Federal, State and Territory Treasurers and Ministers for Housing, Women and the Prevention of Family Violence: *A Gender Responsive National Housing and Homelessness Agreement*, October 2017, accessed at <https://www.equalityrightsalliance.org.au/a-gender-responsive-national-housing-and-homelessness-agreement/> on 15 March 2018.

⁶ Australian Institute of Health and Welfare, *Fact Sheet: Specialist Homelessness Services 2016-17: Australian Capital Territory*, Canberra: AIHW, 2018, Table 1.

⁷ Australian Institute of Health and Welfare, *Fact Sheet: Specialist Homelessness Services 2016-17: Australian Capital Territory*, Canberra: AIHW, 2018, p. 1.

⁸ Homelessness Australia, *Factsheet: Homelessness and Women*, April 2013, pp.2-3.

⁹ Anglicare Australia, *Rental Affordability Snapshot*, 2017, p. 81.

¹⁰ R. Nissim, 'A bit of housing justice – the story of HomeGround Real Estate' *Australian Policy Online*, 15 February 2017, accessed at <http://apo.org.au/node/72475> on 19 March 2018.

YWCA Canberra recommends that the ACT government:

- provides land tax reductions to landlords who lease their properties to fellow Canberrans at 75 per cent or less of market rates through ACT registered community housing providers.

Overview of Recommendations

YWCA Canberra recommends that the ACT government:

1. provides land tax reductions to landlords who lease their investment properties to fellow Canberrans at 75 per cent or less of market rates through ACT registered community housing providers.
2. upholds and implements the Livable Housing Design Guidelines for new dwellings and links Universal Design commitments to the ACT Housing and Planning Strategies.¹¹
3. identify and address the intersectional vulnerabilities of women with disability through targeted consultation and specialist support.
4. consult with older women to develop innovative housing models that meet their unique needs.
5. work with Aboriginal and Torres Strait Islander communities to address the need for additional Indigenous-led housing support and service provision.
6. fund specialist and culturally-appropriate housing and homelessness services for Aboriginal and Torres Strait Islander women escaping domestic violence.
7. fund additional culturally-appropriate training for employees of mainstream housing and homelessness services.
8. consult with Aboriginal and Torres Strait Islander communities prior to the development of new social and community housing dwellings.
9. consult with sole-parent households headed by women regarding housing options that are most appropriate to their specific needs.
10. fund social and affordable rental properties for large families.

Women with Disability

Women with disability are one of the most invisible, excluded and neglected groups of Australian society — facing multiple forms of discrimination, structural inequality, poverty and social exclusion.¹² In the ACT, there is a shortage of accessible housing for people with disability in the private rental market, and according to the Anglicare Rental Affordability

¹¹ See also People with Disabilities ACT, *Budget Submission 2017-2018*, accessed at <https://www.pwdact.org.au/index.php/policyinfo/271-budget-submission-2017-18>, on 19 March 2018.

¹² Women with Disabilities Australia (WWDA), *Shut out, hung out, left out, missing out: Response to Australian Government's Green Paper 'Which way Home? A New Approach to Homelessness'*, June 2008, p. 6; United Nations Population Fund, *State of the World Population 2005: The Promise of Equality – Gender Equity, Reproductive Health and the Millennium Development Goals*, New York: UNFPA, 2005 cited in Women with Disabilities Australia (WWDA), *Shut out, hung out, left out, missing out: Response to Australian Government's Green Paper 'Which way Home? A New Approach to Homelessness'*, June 2008, p. 6.

Snapshot 2017, clients (not specifically those with disability) seeking any social housing support face exceptionally long wait times of over one year.¹³

While research on the housing experiences and needs of people with disability is limited, People with Disabilities ACT (PWDACT) argues that housing options for people with disability are generally more limited than for the broader population.¹⁴ PWDACT has also warned against quick-fix housing models for people with disabilities, emphasising the importance of developing independent housing options in the community.¹⁵ YWCA Canberra endorses PWDACT's key ask for the ACT government to deliver on commitments in the Parliamentary Agreement through the implementation of the Livable Housing Design Guidelines.¹⁶

According to Livable Housing Australia, a liveable home is designed to meet the changing needs of occupants across the lifespan.¹⁷ This is in line with rights-based understandings of ability as being on a continuum.¹⁸ Further, as outlined in the Livable Housing Design Guidelines, a liveable home is designed to:

- be easy to enter
- be easy to navigate in and around
- be capable of easy and cost-effective adaptation, and
- be responsive to the changing needs of home occupants.¹⁹

Key drivers and market viability for implementation of the Livable Housing Design Guidelines include Australia's ageing population, the 1 in 5 Australians with disability and those people who acquire disability in older age.²⁰ Gender difference between men and women with disability is reported to be most notable in older people, with 68.3 per cent of women over 90 years reporting a 'profound or severe limitation', compared with 51.2 per cent of males.²¹ As a result, women with disability face triple discrimination — lack of affordable housing, lack of appropriate built form and are placed at greater risk of homelessness.²² For this reason, the needs of women with disability must be separately addressed to the needs of people with disability more generally.

YWCA Canberra recommends that the ACT government:

¹³ People with Disabilities ACT, *Budget Submission 2017-2018*, accessed at <https://www.pwdact.org.au/index.php/policyinfo/271-budget-submission-2017-18>, on 19 March 2018; Anglicare Australia, *Anglicare Australia Rental Affordability Snapshot*, Canberra: 2017, p. 82.

¹⁴ People with Disabilities ACT, *Budget Submission 2017-2018*, accessed at <https://www.pwdact.org.au/index.php/policyinfo/271-budget-submission-2017-18>, on 19 March 2018.

¹⁵ People with Disabilities ACT, *Budget Submission 2017-2018*, accessed at <https://www.pwdact.org.au/index.php/policyinfo/271-budget-submission-2017-18>, on 19 March 2018.

¹⁶ See also People with Disabilities ACT, *Budget Submission 2017-2018*, accessed at <https://www.pwdact.org.au/index.php/policyinfo/271-budget-submission-2017-18>, on 19 March 2018; 9th Parliamentary Agreement between ACT Labor and ACT Greens, 2016, pp. 4-5.

¹⁷ Livable Housing Australia, *Livable Housing Design Guidelines*, Livable Housing Australia: 2017, p. 8.

¹⁸ M. A. Jackson, 'Universal Design – assisting accessibility' in *Sanctuary: Modern Green Homes*, No. 25: Earthly Textures (Summer 2013-2014) p. 85.

¹⁹ Livable Housing Australia, *Livable Housing Design Guidelines*, Livable Housing Australia: 2017, p. 8.

²⁰ Livable Housing Australia, *Livable Housing Design Guidelines*, Livable Housing Australia: 2017, p. 10; Department of Social Services, *National Dialogue on Universal Housing Design: Strategic Plan*, July 2010, pp. 8-9.

²¹ Australian Bureau of Statistics, *Survey of Disability, Ageing and Carers 2015: Summary of Findings*, Canberra: ABS, 2016, accessed at <http://www.abs.gov.au/ausstats/abs@.nsf/Latestproducts/4430.0Main%20Features202015?opendocument&tabname=Summary&prodno=4430.0&issue=2015&num=&view>, on 15 March 2018.

²² Homelessness Australia, *Factsheet: Homelessness and Women*, April 2013, pp.2-3; People with Disabilities ACT, *Budget Submission 2017-2018*, accessed at <https://www.pwdact.org.au/index.php/policyinfo/271-budget-submission-2017-18>, on 19 March 2018.

- upholds and implements the Livable Housing Design Guidelines for new dwellings and link Universal Design commitments to the ACT Housing and Planning Strategies²³
- identify and address the intersectional vulnerabilities of women with disability through targeted consultation and specialist support.

Older Women

Single older women comprise a growing segment of those experiencing housing insecurity and homelessness. The Australian Bureau of Statistics has found that the number of older Australian women who were homeless on Census night in 2016 increased by 31% from the 2011 Census.²⁴ A variety of factors have contributed to the emergence of older single women as a group at heightened risk of housing insecurity, including years of unpaid caring, wage inequities, less secure work tenure, insufficient superannuation, relationship breakdown, death of a partner and the rising cost of living.²⁵

While there has been an increased focus on older women and pathways into homelessness, there is little research available on effective housing solutions for older women.²⁶ Sharam has found that while older women live in shared accommodation on and off, this is considered a last resort and an unstable and short-term solution.²⁷ Similarly, Guo and Castillo place a high importance on the ability for older women to ‘age in place’, particularly for long-tenure and autonomous housing models.²⁸ They argue houses should be pre-designed for the changing physical requirements of older people as they age and become less mobile.²⁹

Despite limited scholarly research, when older women are consulted, there is consistency in their housing preferences.³⁰ Consultations undertaken as part of ACT Shelter’s 2014 research project exploring older women’s housing vulnerability in the ACT, found that security of tenure and independent living are of critical importance to older women.³¹ Older women identified that they preferred a secure townhouse, small house, or cottage, at ground level, with a garden, a second bedroom to care for their grandchildren, and the choice to own pets.³²

²³ See also People with Disabilities ACT, *Budget Submission 2017-2018*, accessed at <https://www.pwdact.org.au/index.php/policyinfo/271-budget-submission-2017-18>, on 19 March 2018.

²⁴ Australian Bureau of Statistics, *Census of Population and Housing: Estimating Homelessness 2016*, Canberra: ABS, 2018, accessed at <http://www.abs.gov.au/ausstats/abs@.nsf/mf/2049.0> on 21 March 2018.

²⁵ YWCA Canberra, Policy Priority three. *Essential to wellbeing: Safe and affordable housing for women*, accessed at <https://ywca-canberra.org.au/advocacy/policy-priorities/essential-to-wellbeing-safe-and-affordable-housing-for-women/> on 16 March 2018.

²⁶ C. Black and L. Ralston, *A Home of One’s Own: Shared Equity Housing for Older Single Women*, Women’s Property Initiatives, Melbourne: 2015.

²⁷ Sharam, *Going it Alone: Single, low needs women and homelessness*, 2008, accessed at: <http://apo.org.au/node/41394>, on 16 March 2018.

²⁸ Guo, K L & Castillo R J, 2012, The U.S. Long Term Care System: Development and Expansion of Naturally Occurring Retirement Communities as an Innovative Model for Aging in Place, *Aging Int*, 37, pp. 210-227.

²⁹ Guo, K L & Castillo R J, 2012, The U.S. Long Term Care System: Development and Expansion of Naturally Occurring Retirement Communities as an Innovative Model for Aging in Place, *Aging Int*, 37, pp. 210-227.

³⁰ Judd, B. et al, 2004, Australian Housing and Research Institute: *Housing Options and Independent Living: sustainable outcomes for people who are homeless*, accessed at: https://www.ahuri.edu.au/_data/assets/pdf_file/0013/2119/AHURI_Final_Report_No62_Housing_options_and_independent_living.pdf, on 16 March 2018.

³¹ ACT Shelter, *Home Truths: Older Women’s Housing Vulnerability in the ACT*, 2014, accessed at: <https://issuu.com/actshelter/docs/home-truths-older-women-housing-vul>, on 16 March 2018.

³² ACT Shelter, 2014.

A co-design project (funded by Mercy Foundation and Homelessness NSW), which saw the development of housing models by older women and the Sydney Women's Homeless Alliance, found similar preferences, and demonstrates the power of consultation with consumer groups.³³

YWCA Canberra's houses for older women provide an innovative solution to older women who fall through the cracks of traditional social and affordable housing models. As noted by Peterson and Parsell, older women often do not meet the eligibility criteria for much transitional and affordable housing models, placing them at significant risk of homelessness.³⁴ For safety reasons, many older women fear going to traditional homelessness refuges and transitional houses.³⁵ To meet this need, our houses provide older women with a safe option which meets their specific needs. As group homes, the houses also provide the women with a much needed safety net and community network, which frequently, older women have lost as a result of their homelessness. Anecdotal feedback from our housing services have informed us of the powerful impact of such community support on the safety, happiness and wellbeing of older women — a key marker of success.

In addition to the implementation of Universal Housing Design Guidelines for improved accessibility for older women, YWCA Canberra recommends that the ACT Government:

- consult with older women to develop innovative housing models that meet their unique needs.

Aboriginal and Torres Strait Islander Women

Aboriginal and Torres Strait Islander people, in particular women, are over-represented in national homelessness statistics — 40 per cent of Aboriginal and Torres Strait Islander people seeking homelessness are women fleeing family/domestic violence, and 21 per cent of women seeking homelessness support as a result of domestic violence are Aboriginal and Torres Strait Islander women.³⁶ The correlation between family and domestic violence and homelessness is particularly relevant for Aboriginal and Torres Strait Islander women, who are 35 times more likely to be victims of domestic violence than non-Indigenous women.³⁷ In the ACT, Aboriginal and Torres Strait Islander people are over-represented in homelessness statistics at seven times the rate of non-Indigenous people seeking support.³⁸

³³ See: Sydney Women's Homeless Alliance, Older Women's Studio Development Project: A co-design project to inform design guidelines suitable to the housing needs of single homeless older women, October 2017, accessed at: http://www.homelessnessnsw.org.au/sites/homelessnessnsw/files/2017-04/Older_Womens_Studio_Housing_Project-Web-Version.pdf, on 16 March 2018.

³⁴ M. Petersen, C. Parsell, 'Older Women's Pathways out of homelessness: Report for the Mercy Foundation' Institute for Social Science Research: University of Queensland, Feb 2014, p. 33.

³⁵ M. Petersen, C. Parsell, 'Older Women's Pathways out of homelessness: Report for the Mercy Foundation' Institute for Social Science Research: University of Queensland, Feb 2014, p. 33.

³⁶ Homelessness NSW, *Indigenous people and homelessness*, accessed at <https://www.homelessnessnsw.org.au/resources/indigenous-people-and-homelessness>, on 19 March 2018.

³⁷ Homelessness Australia, *Factsheet: Homelessness and Women*, April 2013, p.2 citing A. Spinney, *Home and Safe? Policy and Practice Innovations to prevent women and children who have experienced domestic and family violence from becoming homeless*, AHURI Final Report no. 196 Australian Housing and Urban Research Institute Limited, Melbourne: 2012.

³⁸ ACTCOSS, *ACT homelessness data – A closer look*, 16 March 2018 accessed at <https://www.actcoss.org.au/news-events/actcoss-news/act-homelessness-data-closer-look>, on 19 March 2018.

Experts in social housing and homelessness service provision emphasise the importance of culturally appropriate social housing service supply, as well as Indigenous-led housing service delivery.³⁹ An understanding of Aboriginal and Torres Strait Islander kin culture is essential in the design of housing support for Indigenous Australians, however, this is often overlooked.⁴⁰

In their research into culturally-appropriate urban social housing for Aboriginal and Torres Strait Islander people, Milligan et al. placed significant importance on two key factors. Firstly, that there is a requirement for culturally-appropriate mainstream housing services for Aboriginal and Torres Strait Islander people within the broad housing service system.⁴¹ However, Milligan et al. emphasised the key role of Indigenous-led housing organisations, Indigenous staff and communities in effectively shaping and delivering services to Aboriginal and Torres Strait Islander communities.⁴² Milligan et al. further highlight that while culturally-appropriate service is highly contextual, there is significant evidence of leading best practice in such service provision that should be implemented.⁴³

YWCA Canberra recommends that the ACT Government:

- work with Aboriginal and Torres Strait Islander communities to address the need for additional Indigenous-led housing support and service provision
- fund specialist and culturally-appropriate housing and homelessness services for Aboriginal and Torres Strait Islander women escaping domestic violence
- fund additional culturally-appropriate training for employees of mainstream housing and homelessness services
- consult with Aboriginal and Torres Strait Islander communities prior to the development of new social and community housing dwellings.

Sole-parent families headed by women

According to the Australian Bureau of Statistics, one-parent families are projected to rise exponentially (from 47% in 2011 to 70% in 2036) with women heading the majority (83%) of one-parent households in 2011.⁴⁴

³⁹ ACTCOSS, 'ACT homelessness data – A closer look', 16 March 2018, accessed at <https://www.actcoss.org.au/news-events/actcoss-news/act-homelessness-data-closer-look>, on 19 March 2018; V. Milligan et al, *Urban social housing for Aboriginal people and Torres Strait Islanders: respecting culture and adapting services*, AHURI Final Report No. 172 Australian Housing and Urban Research Institute Limited, Melbourne: 2011, p. 106.

⁴⁰ Homelessness Australia, Factsheet: Homelessness and Aboriginal and Torres Strait Islanders, January 2016, p. 4.

⁴¹ V. Milligan et al, *Urban social housing for Aboriginal people and Torres Strait Islanders: respecting culture and adapting services*, AHURI Final Report No. 172 Australian Housing and Urban Research Institute Limited, Melbourne: 2011, p. 106.

⁴² V. Milligan et al, *Urban social housing for Aboriginal people and Torres Strait Islanders: respecting culture and adapting services*, AHURI Final Report No. 172 Australian Housing and Urban Research Institute Limited, Melbourne: 2011, p. 106.

⁴³ V. Milligan et al, *Urban social housing for Aboriginal people and Torres Strait Islanders: respecting culture and adapting services*, AHURI Final Report No. 172 Australian Housing and Urban Research Institute Limited, Melbourne: 2011, p. 105.

⁴⁴ Australian Bureau of Statistics, Household and Family Projections, Australia, 2011 to 2036, Canberra: ABS, 2015 accessed at <http://www.abs.gov.au/ausstats/abs@.nsf/Latestproducts/3236.0Main%20Features52011%20to%202036?opendocument&tabname=Summary&prodno=3236.0&issue=2011%20to%202036&num=&view>, on 23 March 2018.

Research commissioned by ACTCOSS, *Hidden disadvantage in the ACT: Report for ACT Anti-Poverty Week*, found that 23 per cent of small areas⁴⁵ in the ACT had a higher proportion of people living in a 'sole parent family in a low income household' than the national average.⁴⁶ According to the report, this rate was higher than for people living in low-income households (10%) and children (16.1%), suggesting that sole-parent families in the ACT are 'doing it [particularly] tough'.⁴⁷

Comparing this data with national ABS statistics, it is probable that the majority of sole-parent families in the ACT are similarly headed by women. These findings align with anecdotal feedback from YWCA Canberra's housing and women's services, with staff and clients telling us that single women with children struggle to make ends meet. According to Homelessness Australia, children experiencing homelessness are 'almost always in a family group, most likely with a single mother'.⁴⁸

These findings indicate that women with children in sole-parent headed and low income households are experiencing high rates of disadvantage. Housing stress and risk of homelessness for this group is significant, necessitating policy and housing options which meet their specific needs. For this reason, YWCA Canberra recommends that the ACT government:

- consult with sole-parent households headed by women regarding housing options that are most appropriate to their specific needs.
- Fund social and affordable rental properties for large families.

Conclusion

YWCA Canberra welcomes to prioritisation of housing affordability, social housing, home ownership and universal housing initiatives as outlined in the Parliamentary Agreement for the 9th Legislative Assembly in the ACT.⁴⁹ YWCA Canberra looks forward to continuing to work with the ACT government to increase housing options for women and women with children in Canberra.

Addressing the unique needs of women and considering the additional disadvantage particular groups of at-risk women face in accessing housing and homelessness services, is central to the successful delivery of housing options. In addition to this, policy and funding must be dedicated to supporting women escaping family and domestic violence — a key driver of the overrepresentation of women who seek homelessness and housing support services.

⁴⁵ In the Report, small areas referred to the ABS Statistical Area Level 1 in the ACT. See Report for more details: Tanton, R. Miranti and Y. Vidyattama, (2017) *Hidden Disadvantage in the ACT: Report for ACT Anti-Poverty Week*, NATSEM, Institute for Governance and Policy Analysis (IGPA), University of Canberra (Report Commissioned by ACT Council of Social Service Inc).

⁴⁶ R. Tanton, R. Miranti and Y. Vidyattama, (2017) *Hidden Disadvantage in the ACT: Report for ACT Anti-Poverty Week*, NATSEM, Institute for Governance and Policy Analysis (IGPA), University of Canberra (Report Commissioned by ACT Council of Social Service Inc), p. 1.

⁴⁷ R. Tanton, R. Miranti and Y. Vidyattama, (2017) *Hidden Disadvantage in the ACT: Report for ACT Anti-Poverty Week*, NATSEM, Institute for Governance and Policy Analysis (IGPA), University of Canberra (Report Commissioned by ACT Council of Social Service Inc), p. 13.

⁴⁸ Homelessness Australia, *Homelessness and Children*, 2016, accessed at https://www.homelessnessaustralia.org.au/sites/homelessnessaus/files/2017-07/Homelessness_and_Children.pdf on 23 March 2018.

⁴⁹ 9th Parliamentary Agreement between ACT Labor and ACT Greens, 2016, pp. 4-5.

I look forward to the results of this consultation and would be pleased to answer any questions in relation to this submission or YWCA Canberra's work in this area.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'Frances Crimmins', written in black ink on a white background.

Frances Crimmins

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