



NSW Ministerial Advisory Council on Ageing (MACA) An independent Advisory Council

'The purpose of MACA is to provide independent advice about ageing issues to the NSW Minister for Seniors. It is important that older people in NSW have healthy, active and better lives.'

Submission to NSW Homelessness Strategy 2025-2035

About MACA

In accordance with the [Ageing Well in NSW Strategy](#), MACA affirms that all people in NSW should be able to:

- experience the positive benefits of living longer.
- enjoy opportunities to participate in, contribute to and be included in, their spheres of interest and local communities.
- engage across generations to be connected.
- maintain healthy, active, and fulfilling lives.
- live in safe environments free of abuse and violence.
- access high quality, timely and affordable services no matter where they live.

In NSW, a senior is a person 60+ years and 50+ years for Aboriginal and Torres Strait Islanders. To be a Senior in NSW (for a NSW Seniors Card), you must be a NSW permanent resident, aged 60 or over, doing no more than an average of 20 hours of paid work a week, across a 12-month period. There is significant diversity amongst seniors based on gender, culture, and language, where people live, income and health status. In 2021 there were 1.9 million people in NSW over 60 years, and it is predicted this will increase to 2.7 million over 60 years in 2041. (2021 Census)

The Issue

MACA's aim is to focus on ending homelessness of older people living in housing stress¹. Of particular concern are older women at risk of homelessness due to family and domestic abuse or neglect.

MACA commends the government on the draft Homelessness Strategy and suggests that homelessness is not an isolated housing issue and needs to be considered in the context of the entire housing spectrum and the interconnected parts that link to the crisis component of the housing spectrum need to be acknowledged.

¹ NSW MACA Position Statement on Homelessness and Housing Stress [Homelessness and Housing Stress: A Position Paper NSW Ministerial Advisory Council on Ageing](#)



The Strategy would benefit from a better articulation of the link between homelessness and other housing policy initiatives. For example, Commonwealth investment in homelessness responses, the creation of the NSW Rental Commissioner and new rental reforms and the Homes NSW commissioning approach.

The Context

The NSW Ministerial Advisory Council on Ageing (MACA) advises the Minister for Seniors on matters affecting the needs, interests and wellbeing of older people in NSW, and on the impact of the ageing of the population. NSW MACA believes older people aged 60 years and over, and Aboriginal and Torres Strait Islander people aged 50 years and over, have the right to available, safe, affordable and accessible places to live in order to age well in NSW.

The growing number of older people who are homeless is most concerning. MACA supports the NSW Government's commitment to address homelessness through targeted strategies and rolling action plans. We support the Government's comprehensive approach that *"Listens to what people have already told us and avoid duplication; builds on what we already all know; is clear about what advice is needed and how it will be used; and is an ongoing partnership rather than a one-off consultation; provides flexible, trauma informed ways for different voices to be heard, including those of people with lived experience and Aboriginal communities; and use existing forums, rather than making additional demands on people's time"*

Also of great concern to MACA is the growing number of retired renters living in poverty. According to the Grattan Institute², more than half of retired renters are living in poverty, 75% being older women. Many are finding it difficult to buy the necessities including food, after they have paid their rent.

One of the guiding principles of the ***Ageing Well in NSW: Seniors Strategy 2021-2031***³ is enabling people to live in their home and community. This includes having the option and ability to age in place or live in an environment that is safe and suits the older person's needs. Homes and services should enable continued mobility, help retain independence and be located in a community of choice by the older person.

Actions

The following is NSW MACA's response to the questions in the consultation paper on the NSW Homelessness Strategy 2025-2035 (the Strategy):

² Renting in retirement <https://grattan.edu.au/report/renting-in-retirement-why-rent-assistance-needs-to-rise/>

³ NSW Ageing Well Strategy 2021-2031 <https://dcj.nsw.gov.au/documents/community-inclusion/seniors/ageing-well-in-nsw-seniors-strategy-2021-2031.pdf>

Section 1: Guiding principles of the Strategy

1. *What do we need to consider as we implement services and system reform guided by these principles over the next 10 years?*

MACA supports a whole of government approach to resolve housing stress and homelessness over the life of Strategy to 2035.

MACA encourages the Government to consider the particular needs of older people who are homeless. Specifically, MACA supports the use of appropriate and accessible design principles (Universal Design) to develop housing that enables older people to age in place. Well-designed housing should be accompanied by a well-trained and supported workforce to provide wrap around services to older people who are homeless or living in housing stress. These services will keep homeless people connected to their local communities. Design that is informed by older people with lived experience of homelessness will build trust in the Government's approach and build the evidence base to create a whole of government strategy to support older people living in housing stress.

MACA suggest the following approaches be considered:

- To fulfil the goals of the *Ageing Well in NSW; Seniors Strategy 2021-2031*, establish a mechanism so that the voice of older homeless people be heard and factored into strategic directions and implementation actions that end homelessness of older people.
- The housing needs of older people in regional and remote areas must be prioritized in all the action plans throughout the life of this Strategy. Key issues facing regional areas include:
 - **Limited Housing Options:** While housing may be more affordable compared to urban areas, regional areas often have fewer rental properties and social housing options, which can make it harder for older people to find stable housing.
 - **Fewer Support Services:** Regional areas tend to have fewer services for the homeless, including shelters, health services, and social work assistance. This can mean that older people in these areas have to travel long distances to access support, which may be difficult for those with mobility or health issues.
 - **Ageing Population:** Some regional areas have a higher proportion of older residents, which may contribute to an increase in homelessness as older people face financial hardship or deteriorating health.
 - **Isolation and Limited Mobility:** Older people in regional areas may experience higher levels of social isolation due to geographic isolation and fewer opportunities for social engagement. Lack of public transport and access to community resources can exacerbate their vulnerability.

- When older people are victims of domestic and family violence, their particular needs must be considered. Older women are the fastest growing homeless cohort in recent times and a major cause of their homeless experience is due to domestic and family violence. The availability of safe and accessible housing for older women and First Nations women should be prioritised.
- Some older people may also be the perpetrators of violence, and the priority must be early intervention and separation of victims from perpetrators by ensuring adequate housing is available.
- Increase funding to Specialist Homeless Services, targeted at reaching out to the first time at risk of homeless older women and advise on the status of Housing First in the current operation of the Department.
- Undertake a review of the eligibility criteria for the Social Housing Priority list and explore other pathways to reduce homelessness in older people and consider lowering the eligibility for Priority access to social housing from 80 years and over to 60 years and over and to 50 years and over for Aboriginal and Torres Strait Islander people.

2. Which principle should be prioritized and why?

The nine Principles underpinning the Strategy are:

- Housing is a human right.
- Aboriginal expertise and leadership are respected.
- People with lived experience inform service design.
- Person-centred principles are embedded in policy and practice.
- Prevention is prioritised.
- Housing First principles are embedded in policy and practice.
- Service planning and delivery is flexible, localised and joined-up.
- The workforce is strong and supported.
- Systems, tools and measurement are consistent and fit for purpose.

MACA supports the nine principles but would also suggest that the principles of Co-Design and Universal Design be specifically included. Co-design is a key element of the third principle that people with lived experience inform service design. Universal Design is a key component of the fourth principle of person-centred design, and ensures that housing is accessible, affordable and appropriate for older people to age in place. MACA suggests the following approach to each of the nine guiding principles in the Strategy:

1. Housing is a human right.

Australia is a signatory to the United Nations Principles for Older Persons⁴, which states that:

- Older persons should be able to live in environments that are safe and adaptable to personal preferences and changing needs and capacities.
- Older persons should be able to reside at home for as long as possible.

These rights form the basis of a future Australian Government commitment to embedding housing as a human right. This is a Third Action Plan priority 2030-2035.

2. Aboriginal expertise and leadership are respected.

To meaningfully respect Aboriginal expertise and their leadership, a self-determination approach is suggested which enables Aboriginal people to develop appropriate housing for their social and cultural needs. This is a Third Action Plan priority 2030-2035.

Standalone plans for Aboriginal people, children and young people need to address the over-representation of these groups amongst the homeless.

3. People with lived experience inform service design.

People with lived experience informing service design, by applying co-design methodology, is seen as a short-term priority within the First Action Plan 2025-2026 and ongoing.

4. Person-centred principles are embedded in policy and practice.

Person-centred principles should be embedded in policy and practice by applying a Universal Design approach⁵. Universal design is understood internationally as a means of achieving an inclusive society. It includes designing for the greatest number of people who can use a product, place, building, service or website. MACA supports additional budget enhancement to fulfill the goals of the Rare, Brief, and Not Repeated Strategy for addressing homelessness. This is an immediate high priority within the first Action Plan 2025-2026.

5. Prevention is prioritised.

MACA supports the prioritisation of prevention strategies which can break the cycle of homelessness across generations and build skills and resilience within families facing housing stress. MACA sees this as a high priority for immediate service focus within the first Action Plan 2025-2026.

⁴ [United Nations Principles for Older Persons | OHCHR](#)

⁵ [What is universal design? - Centre for Universal Design Australia Home Page](#)

6. Housing First principles are embedded in policy and practice.

Housing First principles embedded in policy and practice are acknowledged as important, but MACA suggests that investment in building the capacity of specialist support services must be the first step. The particular needs of older people in terms of specialist support need to be considered. This is a medium priority in the Second Action Plan 2027-2030.

7. Service planning and delivery is flexible, localized and joined-up.

Co-ordination of service delivery is crucial to ensuring people stay in suitable housing and do not return to homelessness. The particular characteristics of each local area need to be considered to address gaps in services and infrastructure.

- Urban areas typically have more resources and services, though these can be overstretched. In contrast, regional areas may lack the infrastructure to adequately support older people facing homelessness.
- While housing in regional areas is generally cheaper, the supply of affordable and appropriate housing for older people is often limited. In urban areas, housing may be more expensive but also more diverse in terms of types of accommodation available.
- Both urban and regional areas see high levels of social isolation among older people, but the impacts can be more severe in regional areas due to geographic isolation.

MACA encourages the government to look at how Local Government Planning Policies impact the supply of suitable housing for older people. For example, current occupation permissions for relocatable homes (on private land) are often time limited forcing increased stress and cost onto people with limited financial resources.

MACA acknowledges the development of a joined-up system is a long-term project which requires an understanding of the needs of all the population groups facing homelessness. Older people require a service system that enables them to get support to remain at home, to maintain engagement with their local community and to feel safe. This is a long-term priority in the Third Action plan 2030-2035.

8. The workforce is strong and supported.

A strong and capable workforce is fundamental to respond to the changing needs of the population. Older people will need a support workforce that can assist them to find services to help them stay at home and continue to participate in their local community as they age. This is a high priority and ongoing within the First Action Plan 2025-2026.

9. Systems, tools and measurement are consistent and fit for purpose.

Systems must reflect the needs of people in housing stress, which will differ depending on age, ability, culture and location. Older people must be part of any system design to ensure their needs are considered and addressed appropriately. A Universal Design approach should be embedded in all system design, including customer service and asset management. This is a long-term priority which requires extensive thinking and trials within the Third Action Plan 2030-2035.

Section 2: Strategy focus areas:

Outcome 1: Where possible, homelessness is prevented from happening in the first place, making it rare.

1. To make homelessness rare, what should NSW prioritise for action and why?

MACA is very concerned about the growing number of older people in NSW who are homeless. The 2021 Census estimated that nearly 35,000 people were homeless, of whom 6,000 were over the age of 55 years⁶. Older women are disproportionately affected by the housing crisis and financial insecurity and were the fastest growing group of people experiencing homelessness and or at risk of homelessness, increasing by 31% since 2011⁷.

MACA's focus is addressing homelessness in older people to alleviate stress and improve wellness. The longer older people are homeless or living in unsafe, inaccessible and unaffordable housing, the higher the risk of premature death, hospitalisation or incarceration which impose unnecessary costs on government services.

MACA suggests immediate actions to provide housing for:

- Older single women aged 80 years and over and Aboriginal and Torres Strait Islander women aged 50 years and over who are experiencing domestic and family violence and abuse and at risk of homelessness
- Older people aged 55 to 65 years who are on Job Search Allowance, living under the poverty line, who are at risk of homelessness

MACA suggests the eligibility criteria for the Social Housing Priority list requires urgent review and other pathways to reduce homelessness in older people be considered. Lowering the eligibility for Priority access to social housing from 80

⁶ Australian Bureau of Statistics, 20490DO002_2021 Estimating homelessness: Census, 2021

⁷ Australian Human Rights Commission, Older Women's Risk of Homelessness Background Paper 2019 states that there was a 55% increase in the last decade women aged 55-74 years seeking support from homelessness services, Older Women's Risk of Homelessness: Background Paper (2019) | Australian Human Rights Commission

years and over to 60 years and over and to 50 years and over for Aboriginal and Torres Strait Islander peoples is an important first step.

A further step could be increasing attention on those who are leaving prison, especially given that older people in prison are growing at a faster rate than younger people⁸. Older adults who experience homelessness are at high risk of incarceration, and incarceration is a risk factor for homelessness. This can create a cycle of homelessness and incarceration. A paper prepared for the Australian Association of Gerontology⁹ on older people leaving prison cited that this group faced significant societal stigma and preconceptions about people who have been in prison. People who have been homeless and/or incarcerated struggle to find employment and rarely gain access to residential aged care places. Evidence indicates that people who are ageing in prison experience higher levels of physical illness, particularly chronic diseases, than both younger people in prison and their older counterparts in the community. The UN-enshrined principle of the 'equivalence of care' means that older people in prison should be afforded the same supports to keep them as healthy as their counterparts in community. Instead of being released to homelessness, this group needs specific safe housing that meets their complex needs.

2. What opportunities and risks are there for implementing actions under this outcome?

MACA considers that one of the greatest risks facing older people in housing stress is that of being housed in accommodation that is inaccessible and inappropriately designed to enable them to age well and in place. Temporary accommodation (such as motels) can exacerbate an older person's disabilities and vulnerabilities, hastening a return to homelessness.

The number of older people who are homeless is not high (est. 6,000), and if they are housed quickly in stable and well-designed housing, some of them can contribute their knowledge and skills by volunteering in their local communities, and some may be able to return to the workforce.

3. What types of target(s) would be most useful to measure our impact and why?

Measuring the impact of services is challenging, but important in program evaluation on a continuous improvement basis. Tenants' surveys or customer surveys should continue and be reported and published for policy makers, funders, and consumers. Case studies about how housing is life changing for older people are crucial to demonstrating the effectiveness of the Strategy.

⁸ <https://www.abs.gov.au/statistics/people/crime-and-justice/prisoners-australia/2021>

⁹ <https://aag.asn.au/libraryviewer?ResourceID=74>

MACA suggests that a net reduction in the number of older people on the Social Housing Waiting List is an appropriate measure of the effectiveness of the Strategy.

Extending the co-design principle in the delivery of the Homelessness Strategy to include co-evaluation with stakeholders would improve the effectiveness of the Strategy. MACA suggests Co-Design, Co-Evaluation and Co-Delivery be considered.

Outcome: 2: When homelessness does occur, people are quickly connected to housing and the supports they need.

4. To make homelessness brief, what should NSW priorities for action and why?

MACA believes homelessness solutions tailored to the needs of older people including wrap around support services, which are linked to mainstream services, are key to ensuring older people can stay in their homes. The support services workforce, of both staff and volunteers, must be well trained in diversity and inclusion competencies. With a well-trained workforce to support them, older people who are placed in temporary accommodation can permanently exit into stable housing solutions.

If older people are housed in dwellings that are accessible and designed to allow ageing in place, then the risk of older people returning to homelessness is lowered.

5. What opportunities and risks are there for implementing actions under this outcome?

MACA sees one of the biggest risks is that inappropriate design forces older people back into homelessness. Solutions which include a range of housing types ensure that older people can find housing that suits their needs.

Retirement Villages (RV) provide housing to around 5% of older people. Some RVs, particularly those run by not-for-profit organisations, target people on low incomes and can be an option for older people who would otherwise be homeless. MACA would like to see RV operators encouraged to innovate and co-design with the Homelessness sector to create better ways to utilise vacant units within retirement villages to provide rental housing to older homeless people.

Services to support people leaving Domestic Violence are encouraged to co-design with the specialist services for older people (e.g. COTA NSW, OWN) to develop services specific to older people, thus enabling their temporary homeless status to be as brief as possible.

6. *What types of target(s) would be most useful for measuring our impact and why?*

Measurable targets such as reducing the number of older people on Social Housing Waiting List are only part of the picture in determining the effectiveness of the Strategy. The number of older people who died while waiting for appropriate housing is an indicator of how quickly needs are being met.

MACA supports applying a person-centred approach, with reasonable and achievable timelines, for older people in temporary accommodation to move into permanent housing solutions.

Outcome 3: When homelessness does occur, people do not experience multiple episodes of homelessness.

7. *To ensure homelessness is not repeated, what should NSW prioritise for action and why?*

MACA sees the design of dwellings for older people as a key priority. Accessible and appropriate housing for older people will ensure homelessness is not repeated. This principle applies to both social and private rental housing, MACA encourages the government to adopt the National Construction Code to ensure all new dwellings meet the Livable Housing Design Standards.

The government has acknowledged that the supply of housing must be increased, and MACA supports Build-to-Rent as one of the many housing solutions. Security of tenure, in this and other types of rental housing, will provide security and stable housing.

MACA supports the Housing First Principle, so that older people's immediate needs are met and a return to homelessness prevented. Older people may need support with financial and other skills to be able to cope with the high cost of living currently being experienced. A specific service to provide this type of support would be beneficial to all people experiencing homelessness.

8. *What opportunities and risks are there in implementing actions under this outcome?*

MACA is concerned that finding appropriate housing takes too long and older people end up in hospital, in the justice system or die prematurely. There are risks to children in terms of disruption to schooling, connection with friends and teachers etc. when mothers are escaping domestic and family violence. The opportunities in successfully implementing this action will break the cycle of generational homelessness.

9. *What types of target(s) would be most useful for measuring our impact and why?*

MACA supports improved information on the accessibility features of dwellings on the social housing register. Along with a cross-government and linked homelessness support service, this information can assist in ensuring housing is targeted to meet specific needs, especially of older people with mobility or other challenges. Measuring the data collected from the register will inform the efficacy of the Strategy.

MACA encourages the government to work with key partners (outside the NSW Government) to achieve collaborative success.

References

Australian Association of Gerontology: Issues facing older people leaving prison: Background paper (2022)

<https://aag.asn.au/libraryviewer?ResourceID=74>

Australian Bureau of Statistics, 20490DO002_2021 Estimating homelessness: Census, 2021

Australian Bureau of Statistics, Prisoners in Australia (2021)

<https://www.abs.gov.au/statistics/people/crime-and-justice/prisoners-australia/2021>

Australian Human Rights Commission, Older Women's Risk of Homelessness: Background Paper (2019) | Australian Human Rights Commission

[Centre for Universal Design Australia Home Page](#)

Grattan Institute 2025: Renting in retirement – why rent assistance needs to rise:

<https://grattan.edu.au/report/renting-in-retirement-why-rent-assistance-needs-to-rise/>

NSW Ageing Well Strategy 2021-2031

<https://dcj.nsw.gov.au/documents/community-inclusion/seniors/ageing-well-in-nsw-seniors-strategy-2021-2031.pdf>

NSW MACA Position Statement on Homelessness and Housing Stress

[Homelessness and Housing Stress: A Position Paper NSW Ministerial Advisory Council on Ageing](#)

[United Nations Principles for Older Persons | OHCHR](#)

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