

Domestic Violence NSW Submission to the NSW Domestic and Family Violence Shared Equity Taskforce



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D O M E S T I C
V I O L E N C E
N S W

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Acknowledgement

This report was written on the stolen and unceded lands of the Gadigal People of the Eora Nation. We pay respects to the Elders past, present and emerging.

Domestic Violence NSW acknowledges Aboriginal and Torres Strait Islander peoples as the first sovereign nations across the breadth and depth of Australia. We recognise that Aboriginal and Torres Strait Islander people have lived and cared for Country for over 60,000 years and continue to do so, honouring ancestors and knowledge holders within community, and observing ancient cultural practices.

We acknowledge the damaging silence of Aboriginal and Torres Strait Islander people and hold their stories with great care.

We concede that Aboriginal and Torres Strait Islander women are at the highest risk of sexual, family and domestic violence compared with other women in Australia. We acknowledge that domestic and family violence are not part of Aboriginal culture and assert that the responsibilities of Aboriginal families and kinship systems do not align nor are reflected in current government policies. Domestic Violence NSW work to position ourselves as allies and give voice and strength to the unique position that Aboriginal and Torres Strait people hold in their own family systems and communities.



About Domestic Violence NSW

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Domestic Violence NSW (DVNSW) is the **peak body for specialist domestic and family violence (DFV) services in NSW**. We have over 150 member organisations across NSW. We work to improve policy, legislative and program responses to domestic and family violence and to eliminate DFV through advocacy, partnerships and promoting good practice.

DVNSW members represent the diversity of specialist services working in NSW to support women, families and communities impacted by domestic and family violence. They are non-government funded organisations. Our member organisations include crisis and refuge services, transitional accommodation and community housing providers, family support services, Aboriginal community controlled organisations and specialist CALD organisations, specialist homelessness service providers, men's behaviour change programs and networks, community organisations working with high-risk communities, specialist women's legal support services, women and children's support services, and Safe at Home programs.

DVNSW gives permission for this submission to be published publicly.

This submission is representative of DVNSW's 150+ member services.

Executive summary

DVNSW supports the expansion of the Shared Equity Scheme to DFV victim-survivors, however, several changes are required to ensure accessibility as outlined in the recommendations of this 165 submission. Most importantly, the NSW Government must:

1. Increase income thresholds for single participants and couples;
2. Ensure eligibility for victim survivors who have not engaged with police or the criminal justice system;
3. Ensure eligibility for victim survivors of family violence as well as intimate partner violence;
4. Allow purchase as sole owner or co-owner;
5. Reduce the frequency of periodic reviews and ensure that there is no disincentive to increase income;
6. Implement the pilot without a time limit on eligibility and use the data from the pilot and lived expertise to inform future decisions regarding a timeframe;
7. Extend the trial for an additional 12 months to provide fair and sufficient time for victim survivors to apply for the scheme and to evaluate impact; and
8. Work with the NSW Anti-Slavery Commissioner to explore possibilities to ensure accessibility for DFV victim survivors who are also survivors of modern slavery.

DVNSW supports efforts to create pathways to home ownership for victim survivors of domestic and family violence. Other initiatives that the Government could consider to support home ownership are outlined in section 6, which include low fixed interest rates and grants for establishment costs and legal fees. Significant additional investment is also required to improve housing outcomes for DFV victim survivors who are not in a financial position to pursue home ownership, including increased investment in social housing, transitional housing and temporary accommodation and initiatives that specifically address the needs of marginalised communities, as detailed in section 12.

DVNSW endorses the submission and recommendations of the Centre for Women's Economic Security.

Recommendations

Recommendation 1.1: The NSW Government undertake or commission research to examine the rates of home ownership in people that have experienced DFV compared to the general population, and the unique barriers they must overcome to inform future policy decisions.

Recommendation 1.2: Data should also be examined comparing home ownership among marginalised groups experiencing intersecting barriers to home ownership, including women, people from migrant and refugee communities and Aboriginal and Torres Strait Islander communities. This research will inform additional steps the Government can and should take to support home ownership.

Recommendation 2.1: The NSW Government extend the trial period for an additional 12 months until June 30th 2025, to give fair and sufficient time for victim-survivors to apply for the scheme and to evaluate the impact.

Recommendation 2.2: Victim-survivors who apply for and prove their eligibility for the Shared Equity Scheme prior to the end of the trial period can access the scheme, even if the purchase of their home is not yet complete by June 2024.

Recommendation 2.3: To ensure that DFV victim-survivors have access to the scheme, funding for additional places will need to be specifically set aside for people who have experienced DFV.

Recommendation 3.1: Eligibility criteria should include A) those cases where there is a domestic violence offence conviction and/or B) an Apprehended Domestic Violence Order (ADVO) or court injunction based on evidence of DFV that is current or expired in the past 2 years and/or C) a declaration of DFV by a competent person.

Recommendation 3.2: Eligibility criteria should include victim-survivors of other forms of family violence, in addition to intimate partner violence, including family violence and elder abuse.

Recommendation 4.1: Revenue NSW to be responsible for obtaining evidence, to minimise the administrative burden placed on DFV victim-survivors which could limit the accessibility of the scheme.

Recommendation 4.2: A process and agreement should be implemented between Revenue NSW, courts, and police to streamline information sharing and ensure efficient and timely processing of applications to the shared equity scheme.

Recommendation 4.3: A 'Declaration by competent person' template form to be adapted for the Shared Equity scheme.

Recommendation 5.1: The Shared Equity Scheme adopts the definition of 'competent person' as per Schedule 3 of the Residential Tenancies Act 2010 and expands the definition to also include independent advocates from disability services, disability support workers, community access workers, homelessness workers, workers from Aboriginal corporations, and tenancy advocates.

Recommendation 6.1: The NSW Government to review the Shared Equity Schemes operating across Australia to inform the expansion of the NSW scheme to DFV victim survivors.

Recommendation 6.2: Consideration be given to establishing new initiatives to support home ownership for DFV victim survivors that include supports similar to the IBA, including concessional home loans, with low and flexible interest rates and deposit requirements, to low-income DFV victim survivors who are unable to access mainstream financing, and grants for establishment and legal fees, repairs, maintenance and minor renovations.

Recommendation 7.1: The Shared Equity Scheme be accessible to DFV victim-survivors, regardless of their relationship status.

Recommendation 7.2: The Shared Equity Scheme be accessible to DFV victim-survivors who wish to purchase a home as co-owners with family members or other support persons.

Recommendation 7.3: The Shared Equity Scheme be made accessible to DFV victim-survivors, regardless of whether they have previously received government assistance to purchase a home.

Recommendation 7.4: The Shared Equity Scheme excludes superannuation from the asset test, at a minimum for over 50's cohort, but ideally for all participants accessing the scheme.

Recommendation 8.1: Increase income thresholds; align with the income thresholds in the Victorian Homebuyer Fund of \$130 485 for individuals and \$208 775 for couples.

Recommendation 8.2: The Government to contribute an equivalent portion of the Stamp Duty; e.g., if the Government is contributing 40% of the purchase price, they then also contribute 40% of the Stamp Duty.

Recommendation 8.3: Amend the Shared Equity Scheme Policy Guidelines so that participants in the Shared Equity Scheme are not penalised if their income increases above the specified thresholds. The periodic review should be undertaken after the first five years after entering the scheme, rather than the proposed two-year review.

Recommendation 8.4: Remove the requirement for the income of DFV victim survivors who are single when they apply for the scheme but subsequently re-partner, to be combined with that of their partner for the purpose of the Shared Equity Scheme income thresholds.

Recommendation 8.5: Allow DFV victim survivors to apply, on a case-by-case basis, to be absent from their principal place of residence for any length of time if safety concerns arise.

Recommendation 8.6: The NSW Government work with the NSW Anti-slavery Commissioner and his new Financial Sector Roundtable to explore possibilities for flexible application of, or additional public and/or private pathways to finance the 2% deposit criterion. This consultation, as a minimum, should examine alternatives to the requirement for a 2% deposit for DFV victim-survivors who are also survivors of modern slavery, and consider lease-to-buy arrangements, and explore public-private partnership to provide a supplementary financing, in line with obligations under the *Modern Slavery Act 2018* (Cth) and *Modern Slavery Act 2018* (NSW).

Recommendation 8.7: The application and assessment processes allow for specific adjustments to be made for DFV victim-survivors who are also survivors of modern slavery, to ensure access to the Scheme for people who escape abuse without access to key documents, and for people who trigger red flags in financial institutions' Know Your Customer and onboarding processes.

Recommendation 9.1: The Shared Equity Scheme be implemented without a time limit on eligibility. Reviews of the scheme to be undertaken that seek lived expertise input and analyse the data regarding the length of time from leaving an abusive relationship to applying for the scheme, to inform any future decisions regarding imposition of a timeframe to the scheme.

Recommendation 10.2: A funded community awareness campaign to be implemented to raise awareness of the scheme and how to access it.

Recommendation 11.1: The operational guidelines for the scheme, community awareness training and DFV training for relevant staff to be complete by no later than December 2023.

Recommendation 11.2: The Shared Equity Scheme Taskforce consults with the NSW Anti-Slavery Commissioner regarding timeframes, as victim survivors who have experienced modern slavery may experience additional barriers with rebuilding finances or establishing a financial identity.

Recommendation 12.1: Deliver a social housing target of 10% of occupied residential dwellings in NSW by 2050 to provide much needed relief to the current housing crisis and provide safe and affordable housing for women and children who have experienced DFV. DVNSW suggests allocation of 20% for victim-survivors of DFV, recognising that DFV has greater impacts on marginalised communities.

Recommendation 12.2: The NSW Government match the Commonwealth Government's contribution of \$610 million for social housing and ensure specific allocation for women and children experiencing DFV. Pending the passing legislation of the Housing Australia Future Fund (HAFF), ensure 20% allocation of properties for women and children experiencing DFV.

Recommendation 12.3: Ensure safe and affordable transitional housing for women and children exiting crisis refuges by assessing current availability across the state and fund additional capacity particularly in regions where new core and cluster refuges will be built.

Recommendation 12.4: Increase the accessibility and safety of temporary accommodation for women and children experiencing DFV by analysing local availability and auditing current providers. Allocate 20% of all temporary accommodation to women and children experiencing DFV and ensure they are not placed in the same accommodation as perpetrators.

Recommendation 12.5: Invest in social housing for specific marginalised communities including Aboriginal owned housing, people with disabilities, and specific allocation for regional, rural, and remote communities.

Recommendation 12.6: Provide access for women on temporary visas to the entire housing service system include crisis accommodation, transitional accommodation, and social and affordable housing.

Recommendation 12.7: Invest a further \$200 million in comprehensive maintenance works across the NSW social housing portfolio across the next decade, in addition to the \$300 million already committed in the 2022-23 NSW budget.

Recommendation 12.8: Introduce streamlined development approvals for Community Housing Providers to fast-track affordable housing projects and reduce planning and delivery costs.

Recommendation 12.9: Increase the accessibility of private rentals by increasing Commonwealth rent assistance by a minimum of 50%, double the Job Seeker payment and remove 'no grounds' evictions.

Recommendation 12.10: Fund a specialist older person's housing information and support service that comprises both an early intervention and crisis response, similar to the Housing for the Aged Action Group 'Home at Last' model in Victoria.

Recommendation 12.11: Lower the priority age for social housing eligibility from 80 to 55 years as a matter of urgency.

Recommendation 12.12: Review the effectiveness of the Rent Choice Start Safely program, noting that private rental subsidies are less effective due to the high demand and competition in the private rental market. Consideration of other mechanisms to control rents is required, including increasing the supply of affordable housing and caps to rent increases.

A note on terminology

Domestic violence

Interpersonal violence or abuse perpetrated by an intimate partner or ex-partner. Domestic violence can include a variety of forms of abuse including but not limited to physical, sexual, psychological, financial abuse, stalking and intimidation. Domestic violence extends beyond physical violence and frequently involves the exploitation of power imbalances and patterns of abuse.

Family violence

Violence perpetrated by a family member, carer, guardian, child or kinship carer. Family violence can include a variety of forms of abuse including but not limited to physical, sexual, psychological, financial abuse, stalking and intimidation. Family violence extends beyond physical violence and frequently involves the exploitation of power imbalances and patterns of abuse.

Gendered violence

Gendered violence or gender-based violence refers to harmful acts directed at an individual or a group of individuals because of their gender. It is rooted in gender inequality, the abuse of power and harmful norms. The term is primarily used to draw attention to the fact that structural, gender-based power differentials place women and girls at risk for multiple forms of violence. While women and girls suffer disproportionately from gendered violence, men and particularly boys can also be victims. The term is inclusive of LGBTIQ+ populations, referencing violence related to norms of masculinity/femininity and/or gender norms.

Intimate Partner Violence (IPV)

Abuse perpetrated by a current or former intimate partner such as a partner, husband, wife, girlfriend, boyfriend, or person who someone is dating. Forms of violence are listed under domestic violence.

People with lived expertise

People with lived expertise are people who have experience of sexual, domestic and/or family violence whose expertise as context experts due to their lived experience is noted.

Specialist sexual, domestic, and family violence sector

The specialist sexual, domestic, and family violence sector includes crisis and refuge services, transitional accommodation and community housing providers, family support services, Aboriginal community controlled organisations, specialist multicultural community organisations, specialist LGBTIQ+ organisations, counselling services, sexual violence services, specialist homelessness service providers, men's behaviour change programs and networks, community organisations working with high-risk communities, specialist women's legal and support services, women's health centres, women and children's support services, Safe at Home programs and the Women's Domestic Violence Court Advocacy Services.

Victim-survivor

Victim-survivor refers to a person who is being or has experienced violence, acknowledging that people who have been victimised are survivors and are also victims of crime. We acknowledge that people who have been victimised are survivors and are also victims of crime. This is not intended as an identity term. In the specialist domestic and family violence sector, the preferred term is victim-survivor.

DVNSW notes that the justice sector and legislation use the term victim. In this submission, although used interchangeably, the emphasis has been placed on the term victim-survivor, with victim used at times particularly when discussing the justice system or legislation.

Response to the consultation paper

1. What proportion of DFV victim-survivors seek longer term assistance in making a purchase in the private housing market? What proportion of DFV victim-survivors are in home ownership?

Securing long-term stable housing is an important goal for all DFV victim-survivors who are rebuilding their life after escaping an abusive relationship. DVNSW asserts that further investigation is required to understand the proportion of DFV victim survivors seeking long term assistance to acquire home ownership and the proportion of survivors already in home ownership.

Leaving a violent relationship can lead to a diverse range of housing pathways, including moves within or between different houses and housing types, and for indeterminate periods of time (Flanagan et al. 2019). Housing assistance provided by States and Territories to victim survivors of DFV is often focused on the private rental market and is time limited. Owning a home is preferable to other types of housing for many Australians, but particularly for DFV victim-survivors as it provides greater stability, avoiding concerns about having to find a new rental property when a lease ends or after 90 days in the case of a 'no grounds eviction'. Home ownership also provides greater freedom to make changes and improvements to a property and contributes to building dignity, confidence and a sense of accomplishment, which are vital to recovery from relationships characterised by coercive control. The stability of home ownership means that adult and child victim survivors have the freedom to remain at the same school and place of work and facilitates ongoing engagement with community and social supports that are important for recovering from trauma.

Purchasing a home is becoming increasingly difficult for many Australians, yet there are additional barriers for DFV victim-survivors that impact their credit rating, ability to save the required deposit and/or obtain secure work including but not limited to:

- Disruption to work due to violence and abuse, for example, needing to take leave from work due to abuse, seeking medical treatment, attending to the impact of abuse on children, and engaging with police or the justice system;
- Coercive control in the form of being prevented from working, having limits set on the hours a victim-survivor is able to work, or the type of work they are able to undertake, or preventing a person from accessing higher education and training to upskill and secure higher paying work,
- Financial abuse, for example, the perpetrator controlling money and assets, or a victim-survivor being forced into or unaware of debt;
- Legal costs from engaging in the family law system to protect children from further abuse and/or contact with the perpetrator; and
- Systems abuse, for example a perpetrator intentionally delaying financial settlement following separation and thus preventing a victim-survivor from accessing what were joint funds or assets.

It is important to acknowledge that some groups experience multiple and intersecting barriers that prevent home ownership. Women experience DFV at higher rates than men and experience greater harm compared to male victims (Powell & Webster, 2016). Therefore, women are impacted by the barriers to home ownership listed above to a greater extent. Women are also more likely to work in care industries

and other sectors that attract lower remuneration compared to men, compounding the challenges in purchasing a home (Low & Binns, 2018).

Home ownership is also further out-of-reach for Aboriginal and Torres Strait Islander peoples, due to racism, discrimination and the lasting impacts of colonisation, with rates at 42% compared to 66% in the general population (Australian Bureau of Statistics, 2022).

Recommendation 1.1: The NSW Government undertake or commission research to examine the rates of home ownership in people that have experienced DFV compared to the general population, and the unique barriers they must overcome to inform future policy decisions.

Recommendation 1.2: Data should also be examined comparing home ownership among marginalised groups experiencing intersecting barriers to home ownership, including women, people from migrant and refugee communities and Aboriginal and Torres Strait Islander communities. This research will inform additional steps the Government can and should take to support home ownership.

2. Will expanded access to the Shared Equity Scheme improve home ownership outcomes for DFV victim-survivors?

The NSW Shared Equity Scheme, which began in January 2023, is currently available for single parents with dependent children and single people who do not have dependent children who are over the age of 50. Therefore, some DFV victim-survivors who meet the existing criteria are already eligible for the scheme. Nevertheless, the proposed expansion of the scheme for DFV victim-survivors is important as it **will benefit an additional group of victim-survivors who do not have dependent children and are under the age of 50 years**. The availability of this scheme to DFV victim-survivors, even if they have previously owned a home, either in their own right or jointly with another partner, is an important step in reducing the barriers to leaving an abusive relationship. The risk of losing their home prevents many victim-survivors from leaving abusive relationships, and experiencing homelessness contributes to 7690 women a year returning to an abusive relationship (Equity Economics, 2021). However, some changes to the scheme as outlined in the consultation paper are required to ensure accessibility for DFV victim-survivors are required, in particular raising the income thresholds.

It is important to note that **the expanded scheme will benefit only those DFV victim-survivors who have the financial resources and stability to purchase a home**, with the support of the Government co-contribution of up to 40 per cent of the purchase price. There are many DFV victim-survivors who will be excluded from the scheme who will be unable to service the ongoing mortgage repayments, unable to secure finance from a lender and/or do not have adequate savings for a deposit.¹ In particular, people who are in part-time and/or insecure work, such as short-term or fixed contracts, will have greater difficulty securing finance and taking advantage of the scheme. It is important to note further financial

¹ The Shared Equity Scheme requires a minimum 2% deposit of the purchase price, i.e. up to \$19 000 for properties at the upper end of the price threshold of \$950, 000 (NSW Domestic and Family Violence Shared Equity Taskforce Consultation Paper, 2023)

impacts with the rise of insecure work in Australia, particularly in female-dominated industries, including health care and social services, clerical and administrative work and hospitality (ACTU, 2021). It is possible, therefore, that only a modest number of people will benefit from the proposed expansion of the scheme.

DFV victim survivors may also be excluded from the scheme due to financial abuse perpetrated against them. The perpetrator may force the victim survivor into securing loans or debt in their name or have a default on their credit score for unpaid debts incurred in the relationship. Credit reports can be used as a tool of abuse to harm or coerce a victim survivor. Currently, financial institutions do not distinguish what the cause of existing debt or a poor credit score is, so this will likely further exclude DFV victim-survivors from accessing the scheme.

A range of other responses and interventions are, therefore, required and outlined in section 12 noting the limitations of existing NSW Government funded housing initiatives to support DFV victim survivors. These limitations include:

- Insufficient crisis accommodation: investment in new core and cluster will go some way towards addressing this problem, though it is unlikely that DCJ's target for the number of Aboriginal operated refuges to be commissioned will be met;
- A lack of safe and fit-for-purpose temporary accommodation: while the recent increase from 2 to 5 days temporary accommodation and up to 7 days over a weekend was welcomed by the DFV sector, this change will put further pressure on the demand for safe and accessible temporary accommodation which was already in short-supply, particularly in regional and rural areas;
- A lack of transitional, medium and long-term accommodation for victim-survivors who are transitioning out of crisis accommodation, causing a bottle neck that leaves people in crisis accommodation for longer than the preferred 12 weeks, and up to two years in some cases; and
- Rent increases and the lack of affordable properties in the private rental market prevents the Rent Choice Start Safely program from operating as intended, limiting the capacity of DFV victim-survivors to take advantage of this support.

Subsequently, expansion of the Shared Equity Scheme and making home ownership more accessible to DFV victim-survivors may ease pressure on these over-stretched housing initiatives.

It is important to note that the trial period for the Shared Equity Scheme ends in June 2024. Assuming a period of implementation and awareness raising, it is likely that **the expanded criteria will only be in operation for approximately 6 months. It will be difficult to assess the benefits of the expanded criteria for victim-survivors in such a short period of time.**

Recommendation 2.1: The NSW Government extend the trial period for an additional 12 months until June 30th 2025, to give fair and sufficient time for victim-survivors to apply for the scheme and to evaluate the impact.

The process of purchasing a home often takes several months, due to the need to apply for finance with one or multiple lenders, inspect properties, obtain building and strata reports, negotiate with real estate agents and seek legal advice. It may not be possible for some DFV victim-survivors to move through all stages of this process prior to June 2024.

Recommendation 2.2: Victim-survivors who apply for and prove their eligibility for the Shared Equity Scheme prior to the end of the trial period can access the scheme, even if the purchase of their home is not yet complete by June 2024.

The NSW Domestic and Family Violence Shared Equity Taskforce Consultation Paper (hereafter referred to as Consultation Paper) indicates that a total of 3000 places per financial year are available.

Recommendation 2.3: To ensure that DFV victim-survivors have access to the scheme, funding for additional places will need to be specifically set aside for people who have experienced DFV.

3. What are the pros and cons of using each of the presented eligibility options?

DVNSW suggest that options A and B, outlined in the Consultation Paper, are too narrow and will unfairly prevent a substantial number of DFV victim-survivors from accessing the Shared Equity Scheme.

Of those perpetrators who are charged with breaching an ADVO, 50 to 60% are not served with a conviction if it is their first DFV offence (JIRS,2023). Given the low rates of conviction, this is not an appropriate threshold for eligibility. It is useful to note that access to other supports such as the NSW Government Victims Support Scheme are granted without requiring a conviction and instead decided 'on the balance of probability'. A declaration of DFV by a competent person is a more appropriate form of evidence as many DFV victim-survivors do not contact Police and choose not to engage with the justice system (Evans et al., 2016). DFV victim survivors, may access other support services which would be well placed to provide a declaration to support an application to the Shared Equity Scheme.

DVNSW note that there are many barriers that prevent DFV victim-survivors from engaging with Police and/or the Justice system to obtain a conviction, ADVO or court injunction, including but not limited to:

1. Victim-survivors not identifying their experience as domestic and family violence due to a lack of community awareness and education;
2. Reluctance to engage with or report to police due to fears and or threats of retaliatory violence and escalation of risk;
3. Reluctance to report to Police due to previous negative experiences or concern that Police won't respond appropriately; these concerns are valid given the findings of the 2022 NSW Auditor General's Report into Police responses to domestic and family violence and 2023 Law Enforcement Conduct Commission (LECC) report²;
4. Reluctance to report to Police due to outstanding warrants for the victim-survivor on other unrelated matters;
5. Fear that engaging with the criminal justice system might have negative consequences for current or future family court proceedings; in many cases DFV victim survivors are accused of fabricating allegations of domestic and family violence to achieve favourable outcomes in the family court despite evidence to the contrary (Laing, 2013);

² Both the NSW Auditor General's report (2022) and the LECC report (2022) found issues with police training, the misidentification of the predominancy aggressor, transparency and accountability, managing complaints, and reporting when a police officer is the perpetrator.

6. Victim-survivors being misidentified by police as the primary aggressor or fear of being misidentified; and
7. Fear and/or threats of child protective services involvement that could result in the removal of children from the protective parent's care.

Barriers engaging with Police and the justice system are even greater for Aboriginal and Torres Strait Islander people due to racism, discrimination, high rates of incarceration and child removal.

Other marginalised groups who experience barriers in engaging with police and justice systems include people from migrant and refugee communities, LGBTIQ+ people, and people with disability.

The experiences of migrant and refugee women are often compounded by factors such as a lack of familial and social support networks, communication or language difficulties, limited access to services, and consequences (or fear of consequences) on their migration status. These factors, combined with the lack of knowledge about the Australian legal system, make it difficult for migrant women to recognise or report domestic and family violence (MWA, 2021). Migrant women also face substantial barriers to accessing services due to lack of awareness of legal rights and fear of police and/or government authorities (DV Death Review, 2019).

Restricting eligibility to the Shared Equity Scheme to only those people where there is conviction, ADVO or court injunction will limit access to and therefore discriminate against the above-mentioned marginalised groups.

Furthermore, it is important to note that some forms of abuse are not criminalised in NSW restricting the ability for victim-survivors to obtain an ADVO or conviction. The NSW Government has committed to criminalising coercive control. This legislation will not come into effect until February 2024 at the earliest. Many DFV victim-survivors advocated for this legislation, as Police and Justice Systems were not able to respond to the abuse they experienced, including but not limited to financial abuse, reproductive coercion, verbal and emotional abuse, and sexual abuse or coercion. **Restricting eligibility to the Shared Equity Scheme to only those people where there is a conviction ADVO or Court Injunction will prevent DFV victim-survivors of other types of abuse from accessing the scheme.**

Recommendation 3.1: Eligibility criteria should include A) those cases where there is a domestic violence offence conviction and/or B) an Apprehended Domestic Violence Order (ADVO) or court injunction based on evidence of DFV that is current or expired in the past 2 years and/or C) a declaration of DFV by a competent person.

The Shared Equity Scheme should not be restricted only to people who have experienced intimate partner violence, i.e., abuse perpetrated by a current or former intimate partner such as a partner, husband, wife, girlfriend, boyfriend, or person who someone is dating. **The scheme should be accessible to people who have experienced family violence, i.e., violence perpetrated by a family member, carer, guardian, child or kinship carer.** Family violence extends beyond physical violence and frequently involves the exploitation of power imbalances and patterns of abuse.

Family violence, referring to violence that occurs in extended family and kinship relationships occurs at higher rates in Aboriginal and Torres Strait Islander communities than in the general population (AIHW, 2019).

Similar to Aboriginal and Torres Strait Islander communities, violence from extended family members occurs at higher rates in many migrant and refugee communities. Women from migrant and refugee

backgrounds also uniquely experience additional forms of abuse, including dowry and other abuse from their in-laws and other extended family, and multi-perpetrator abuse when residing with multiple family members (Immigration Advice and Rights Centre, 2021; Settlement Services International, 2021).

Elder violence and violence against people with a disability are often hidden forms of violence due to their insidious nature. Victims are often physically vulnerable, whether due to age, disability, or both, and the dependence they have on their carer for daily needs. Elder abuse is most commonly reported as being perpetrated by an adult child on their parent (AIHW, 2019), and can be further complicated by cognitive impairments such as dementia and other disabilities. People with a disability can also face unique forms of abuse, such as reproductive control, forced or withheld medical treatment, and forced isolation or restraint (AIHW, 2019).

LGBTIQA+ communities can also be subject to abuse from people beyond their intimate partners, particularly due to their increased likelihood to 'choose their family' due to rejection from their biological family (Hill et al., 2021). The forms of abuse unique to LGBTIQA+ communities are primarily based around identity-based abuse, such as 'outing' a person's gender, sexuality, HIV status, occupation as a sex worker and/or illicit drug use or threatening to do so, misgendering, corrective rape, or pressuring the person to conform to gender norms or undergo surgery they do not want (ACON, 2021). People in the LGBTIQA+ community experience higher occurrences of family violence than intimate partner violence (Hill et al, 2021).

It is also important to note the intersections between modern slavery, human trafficking and DFV. According to Koegler et al. (2020), DFV can occur through a coordinated effort of the intimate partner and/or immediate family members.

Restricting the Shared Equity Scheme only to DFV victim survivors of intimate partner violence is therefore discriminatory and culturally insensitive and will limit accessibility of the scheme to marginalised groups.

Recommendation 3.2: Eligibility criteria should include victim-survivors of other forms of family violence, in addition to intimate partner violence, including family violence and elder abuse.

4. What evidence would a DFV victim-survivor need to have to demonstrate eligibility under each of the identified criteria and is this a reasonable requirement for a prospective applicant?

The consultation paper proposes three different eligibility criteria and the evidence a DFV victim-survivor may be able to provide for each criterion is outlined below:

- A) Evidence of a conviction could be sought from the local court by providing the names of the victim and offender. Alternatively, evidence may be sought from police by providing the Police event number from when the matter was reported to Police.
- B) Evidence of an in-force or recently expired ADVO or court injunction granted based on evidence of DFV may be provided by DFV victim-survivors who receive a copy following court proceedings. In situations where the DFV victim-survivor doesn't have a copy of relevant paperwork, this can be sought from the Police, court, or Women's Domestic Violence Court Advocacy Service.

- C) A template form could be developed by the NSW Government for stakeholders to use when making a declaration that a person is a victim-survivor of DFV. Pages 3 and 4 of the Declaration by competent person form as per Schedule 3 of the Residential Tenancies Act 2010 could be adapted for the Shared Equity Scheme. Guidelines accompanying the form should outline:
- a. Competent persons must have consulted (in their professional capacity) with the person seeking to access the Shared Equity Scheme;
 - b. By signing a declaration, the person is providing evidence that the applicant is a victim of domestic violence, based on their professional assessment;
 - c. The competent person does not have to prove domestic violence has taken place;
 - d. A competent person should not, under any circumstances, contact or seek information from the relevant domestic violence offender;
 - e. If the competent person is not satisfied that the tenant who is seeking to end their tenancy, or the tenant's dependent child, is a victim of domestic violence, then they should not make a declaration;
 - f. It is an offence for a person to knowingly provide false or misleading information in connection with a declaration. It is also an offence for a person to sign the declaration knowing that it is false or misleading;
 - g. It is not an offence for a competent person to make a declaration based on information that they believed to be true at the time of making the declaration;
 - h. For example, if the information the competent person based their declaration on is later found to be false or misleading, but the person did not know this was the case at the time of making the declaration, then it is not an offence; and
 - i. A competent person must keep the information in a declaration, and any copy of a declaration in their possession, confidential and secure.

Recommendation 4.1: Revenue NSW to be responsible for obtaining evidence, to minimise the administrative burden placed on DFV victim-survivors which could limit the accessibility of the scheme.

Recommendation 4.2: A process and agreement should be implemented between Revenue NSW, courts and police to streamline information sharing and ensure efficient and timely processing of applications to the shared equity scheme.

Recommendation 4.3: A 'Declaration by competent person' template form to be adapted for the Shared Equity scheme.

5. Does the use of a competent person as per Schedule 3 of the Residential Tenancies Act 2010, which is currently used for short term DFV victim-survivor support, such as ending a tenancy agreement, create risks for the Shared Equity Scheme, which is a longer-term home ownership policy tool that provides substantial financial assistance (up to 40 per cent equity) to eligible participants?

Application of the term 'competent person' as defined in Schedule 3 of the Residential Tenancies Act 2010 does not create any risks for the Shared Equity Scheme. While the Shared Equity Scheme will

provide financial assistance over longer periods of time, this is entirely appropriate given that DFV has long-term impacts on victim-survivors, including their financial recovery and security. It is also important to recognise, that in many cases, the abuse doesn't cease when a relationship ends and can continue for many months or years, particularly in circumstances where there is shared care of children and/or contact between children and the perpetrator.

Prior to December 2020, the term 'competent person' as used in the Residential Tenancies Act was restricted to medical practitioners. The definition was then expanded to include registered health practitioners (i.e., medical practitioners, dentists, psychologists, optometrists and others), registered social workers, and certain child welfare, domestic violence and refuge accommodation workers.

The definition of 'competent person' was subject to review in a 2022 Statutory Review of the domestic violence provisions in the Residential Tenancies Act 2010. The final report and outcome of the Statutory Review is yet to be released.

DVNSW prepared a submission to the Statutory Review and recommended that the definition of competent person be expanded to include independent advocates from disability services, disability support workers, community access workers, homelessness workers, workers from Aboriginal corporations, and tenancy advocates. The same expanded definition for 'competent person' should be applied to the Shared Equity Scheme. This expansion will increase accessibility for marginalised groups including Aboriginal and Torres Strait Islander people, people with disabilities, people of cultural and linguistically diverse backgrounds, LGBTIQ+ people, and people in rural and regional communities who often do not seek support from mainstream services.

Recommendation 5.1: The Shared Equity Scheme adopts the definition of 'competent person' as per Schedule 3 of the Residential Tenancies Act 2010, and expands the definition to also include independent advocates from disability services, disability support workers, community access workers, homelessness workers, workers from Aboriginal corporations, and tenancy advocates.

6. Are there any relevant models that have been considered or implemented in other programs or jurisdictions?

Shared Equity Schemes are in operation in the majority of states and territories across Australia. Victoria is most similar to NSW in relation to median house prices and cost of living. Of particular note, the Victorian Homebuyer Fund, launched in 2021, has an income cap of \$130,485 for individuals and \$208,775 for couples.

Recommendation 6.1: The NSW Government to review the Shared Equity Schemes operating across Australia to inform the expansion of the NSW scheme to DFV victim survivors.

Aboriginal and Torres Strait Islander people experience a range of barriers in the housing market, such as intergenerational trauma, discrimination, and cultural and historical pressures, such as extended family structures (Flatau, et al., May 2022).

In recognition of the additional barriers that Aboriginal and Torres Strait Islander People experience, State and Commonwealth Government Homeownership programs offer a range of products and services to assist Aboriginal and Torres Strait Islander people into homeownership, particularly in remote and rural areas. These models could be adapted to meet the needs of victim survivors of DFV.

The Indigenous Business Association (IBA) originally known as the Aboriginal and Torres Strait Islander Commercial Development Corporation (CDC), established in March 1990, oversees the Indigenous Home Ownership Program (IHOP). IHOP offers concessional home loan, with low and flexible interest rates and deposit requirements, to low-income Indigenous Australians who want to purchase their first home but are unable to access mainstream financing. IHOP has helped over **18,000 Indigenous families into home ownership, generating \$2.3 billion in wealth. Culturally appropriate advice is provided alongside support to transition to mainstream financial services. IBA does not charge loan application fees, account keeping fees or require borrowers to take out mortgage lenders insurance.**

Applicants must demonstrate they meet the following eligibility criteria:

- At least 18 years of age;
- At least one applicant must be of Aboriginal or Torres Strait Islander descent;
- Intend to reside in the home being purchased as the principal place of residence;
- Not own an investment property;
- Able to contribute the required deposit/equity;
- Not bankrupt or going through the process of bankruptcy; and
- Have capacity to comfortably meet home loan repayments.

Some challenges in accessing IHOP have been noted, including the requirement to finalise the property purchase within 6 months of approval. If this timeframe is not met, applicants are required to go through the application process again, a costly and time-consuming process that limits accessibility.

Other home ownership schemes for Aboriginal and Torres Strait Islander people that could form a useful model for future initiatives for DFV victim-survivors include:

- The NSW Government Aboriginal Housing Office (AHO) Aboriginal Home Buyer Saving Scheme which provides three grants to Aboriginal people who are social housing tenants or private tenants and have saved up to \$1000 towards a deposit:
 - Home Buyer Booster Grant offers \$2500 for legal fees, property valuations, home and contents insurance, surveying costs, pest control and transfer duty;
 - Tenancy Plus Grant rewards long-term AHO tenants with a good tenancy history with a higher rate of co-contribution up to \$20 000; and
 - Deadly Deposit Grant which matches savings towards a deposit dollar-for-dollar up to a maximum of \$10 000.
- Remote Indigenous Housing Loans which provide a 2-year fixed interest rate, a grant of up to \$13 000 for establishment costs such as legal services or financial advice, pest report, property valuation and home insurance, and a grant of up to \$20 000 for minor house renovations, repairs and maintenance.

Recommendation 6.2: Consideration be given to establishing new initiatives to support home ownership for DFV victim survivors that include supports similar to the IBA, including concessional home loans, with low and flexible interest rates and deposit requirements, to low-income DFV victim

survivors who are unable to access mainstream financing, and grants for establishment and legal fees, repairs, maintenance and minor renovations.

7. What are the most appropriate settings for the identified other eligibility criteria?

The consultation paper lists three other eligibility criteria for consideration.

1. *Whether to limit access for victim survivors who intend to purchase as sole owners or whether co-ownership will be allowed (for example, co-owners with family members or with new partners)*

The Shared Equity Scheme should provide flexibility and accessibility to all victim survivors who require government assistance to achieve home ownership. Victim survivors who have re-partnered are still likely to be experiencing the long-term impacts of abuse, including the impacts of financial abuse, and emotional and physical impacts that may limit their income and earning capacity. Therefore, it is appropriate that the scheme is open to all victim survivors regardless of their relationship status.

Recommendation 7.1: The Shared Equity Scheme be accessible to DFV victim-survivors, regardless of their relationship status.

Other victim survivors may have difficulty purchasing a home as a sole owner, even with the support of the shared equity scheme, but may have greater capacity to participate in the scheme as a co-owner with family members.

Recommendation 7.2: The Shared Equity Scheme be accessible to DFV victim-survivors who wish to purchase a home as co-owners with family members or other support persons.

2. *Whether to limit to DFV victim-survivors who are first-home buyers and have not received other forms of government assistance to purchase a home*

While DFV victim survivors may have accessed previous Government schemes that support home ownership as sole owners or as co-owners with a perpetrator, the emotional and financial impact of the abuse they experienced necessitates additional support from the Government to support housing stability and recovery from the abuse and trauma, as reinforced throughout this submission.

Recommendation 7.3: The Shared Equity Scheme be made accessible to DFV victim-survivors, regardless of whether they have previously received government assistance to purchase a home.

3. *Whether to adjust the asset test for DFV victim-survivors (for example, single people 50 years of age or over) to account for any unique circumstances of this cohort (an asset test may be particularly relevant to a victim-survivor leaving a relationship who is likely to acquire assets as part of a property settlement)*

The Consultation Paper stipulates the following thresholds regarding applicants' assets:

- 30% of the property price for joint applicants with an income over \$90 000;
- 45% of the property price for single applicants aged 18-49 or joint applicants with an income up to \$90 000; and
- 65% of the property price for single applicants 50 years or over.

The NSW Shared Equity Scheme Policy Guidelines 2022 indicated that superannuation is included in the asset test. This is inappropriate and will limit access to the scheme.

Recommendation 7.4: The Shared Equity Scheme excludes superannuation from the asset test for single applicants 50 years or over, but ideally for all participants accessing the scheme.

8. Are there additional eligibility criteria issues that should be considered?

The Consultation Paper stipulates for eligibility that a single person must earn no more than \$90 000 per year and a couple must have a combined income of no more than \$120 000 per year, indexed according to the NSW Wage Price Index each year. In consultation with The Centre of Economic Safety (CWES), DVNSW have confirmed that these income thresholds are too low and that it would be very difficult for victim survivors within these income thresholds to obtain finance.

Recommendation 8.1: Increase income thresholds; align with the income thresholds in the Victorian Homebuyer Fund of \$130 485 for individuals and \$208 775 for couples.

The Consultation Paper states that the NSW Government will contribute a portion of the purchase price of a property up to 40% for eligible home buyers. The Consultation Paper does not indicate whether the Government will also contribute a portion of the Stamp Duty, or if the home buyer will be required to fund the entire Stamp Duty themselves. This could present a barrier for some participants.

Recommendation 8.2: The Government to contribute an equivalent portion of the Stamp Duty; e.g., if the Government is contributing 40% of the purchase price, they then also contribute 40% of the Stamp Duty.

The Consultation Paper states that to maintain eligibility, applicants must comply with a periodic review of ongoing eligibility. The Consultation Paper does not indicate what steps will be taken if circumstances for participants change and they no longer meet the eligibility criteria. The NSW Shared Equity Scheme Policy Guidelines 2022 indicate that participants whose income exceeds the threshold in two consecutive financial years “will be required to make a payment and acquire all or part of the scheme interest if they are assessed as having the ability to do so.” This policy could act as a disincentive for people who increase their income by pursuing higher-paid work or more hours. It is important to ensure that there are no punitive consequences for DFV victim survivors who work and study to increase their earnings. It is also important to ensure that the support of the scheme is not taken away from people in a way that risks their capacity to service their mortgage and maintain home ownership.

Recommendation 8.3: Amend the Shared Equity Scheme Policy Guidelines so that participants in the Shared Equity Scheme are not penalised if their income increases above the specified thresholds. The periodic review should be undertaken after the first five years after entering the scheme, rather than the proposed two-year review.

The Guidelines also state that eligibility may change for people who re-partner if their combined income is above the joint participants’ income threshold. However, DFV victim survivors, particularly those who experienced economic abuse, may be reluctant for their finances to be combined with a new partner. It would only be appropriate for the income of a DFV victim survivor to be combined with that of a new partner if they were together applying for the scheme.

Recommendation 8.4: Remove the requirement for the income of DFV victim survivors who are single when they apply for the scheme but subsequently re-partner, to be combined with that of their partner for the purpose of the Shared Equity Scheme income thresholds.

Further, the Guidelines state that participants in the scheme may be approved to be absent from the home for up to three years provided that the participant subsequently returns to occupy the home as their principal place of residence. This requirement may need to be relaxed for DFV victim survivors if risks to their safety arise and they need to leave their home for a longer period to be safe from the perpetrator.

Recommendation 8.5: Allow DFV victim survivors to apply, on a case-by-case basis, to be absent from their principal place of residence for any length of time if safety concerns arise.

Additional considerations for DFV victim-survivors who have also experienced modern slavery.

Recent data estimates there are 16 400 people in NSW living in modern slavery (Reed, Roe, Grimshaw & Oliver, 2018; Lyneham, Dowling & Bricknell, 2019). There is growing recognition that some victims of domestic and family violence also experience modern slavery, in the form of forced marriage or servitude in domestic and intimate partner settings, and/or sexual exploitation and trafficking. This cohort experience additional barriers to home ownership and would benefit from special consideration in the application of eligibility criteria.

Victims of modern slavery who have also experienced modern slavery are often deprived of both assets and income and often escape with no access to any significant assets. DFV victim-survivors of domestic and family violence who are also survivors of modern slavery would have great difficulty meeting the minimum required 2 per cent deposit, in the absence of additional financial support.

Recommendation 8.6: The NSW Government work with the NSW Anti-slavery Commissioner and his new Financial Sector Roundtable to explore possibilities for flexible application of, or additional public and/or private pathways to finance the 2% deposit criterion. This consultation, as a minimum, should examine alternatives to the requirement for a 2% deposit for DFV victim-survivors who are also survivors of modern slavery, and consider lease-to-buy arrangements, and explore public-private partnership to provide a supplementary financing, in line with obligations under the *Modern Slavery Act 2018* (Cth) and *Modern Slavery Act 2018* (NSW).

Further adjustments to the scheme are required to ensure documentary requirements do not work to bar victims of modern slavery from the scheme. Many survivors of modern slavery who escape domestic and family violence lack access to key documentation, such as commercial documents or personal identity documents. Other victim-survivors of modern slavery may trigger red flags in financial institutions' Know Your Customer and onboarding processes, because their name is linked to judicial or law enforcement records. The financial sector has experience adjusting these arrangements to ensure they do not unintentionally deepen the financial hardship of survivors of modern slavery.

Recommendation 8.7: The application and assessment processes allow for specific adjustments to be made for DFV victim-survivors who are also survivors of modern slavery, to ensure access to the Scheme for people who escape abuse without access to key documents, and for people who trigger red flags in financial institutions' Know Your Customer and onboarding processes.

9. Should a time limit be imposed on eligibility for access to the Shared Equity Scheme for DFV victim-survivors? If so, what is an appropriate time limit?

Imposing a time limit on eligibility for access to the Shared Equity Scheme based on a prescribed number of years after a conviction, ADVO or declaration by a competent person fails to recognise the ongoing and long-term impacts of DFV. In many cases, abuse continues, even after a victim survivor leaves a relationship, or after a conviction is obtained or an ADVO expires. For victim survivors with children who have ongoing contact with the perpetrator, or who have protracted proceedings in the family law system, the abuse and coercive control may continue until their children reach adulthood. Applying a time limit to ADVOS is problematic as it is possible for victim survivors to apply to the court for an ADVO to be extended if they still have concerns for their safety. If eligibility for the Shared Equity Scheme was linked to an ADVO this may influence some DFV victim survivors' decisions regarding applying for an extension, which could impact courts.

As detailed in the response to question 3, it is recommended that eligibility for the scheme be evidenced by a declaration of a competent person. Attempting to apply a time limit to this eligibility criteria is also problematic as obtaining a declaration within the last 12 months won't necessarily mean that the abuse itself occurred within that same 12-month period.

Recommendation 9.1: The Shared Equity Scheme be implemented without a time limit on eligibility. Reviews of the scheme to be undertaken that seek lived expertise input and analyse the data regarding the length of time from leaving an abusive relationship to applying for the scheme, to inform any future decisions regarding imposition of a timeframe to the scheme.

10. Are there other implementation activities required to be completed to provide DFV victim-survivors access to the Shared Equity Scheme?

The consultation refers to Revenue NSW, as the Shared Equity Scheme administrator, requiring lead time to action the system and documentation updates. **Work is required to ensure that the administrative processes are trauma-informed and streamlined to minimise the burden for DFV victim survivors who have often, already had to navigate many complex systems,** including Police, Criminal Courts, Family Court, financial and property settlement, Centrelink, Child Support Agency, as well as emotional and social supports for themselves and their children. Relevant staff will need to be appropriately trained to ensure that they are confident in responding to enquiries and applications in a trauma-informed manner. Victim survivors, where possible, should not be required to repeat the details of their experience of violence.

Recommendation 10.1: Revenue NSW review all enquiry and application processes to ensure they are trauma-informed and streamlined. Revenue NSW provide all relevant staff with training to support their understanding of DFV and how to respond in a trauma informed way.

A community awareness campaign will be required to raise awareness of the scheme and how to access it. A budget should be set aside to cover the cost of a public relations or marketing firm developing and implementing a campaign, ensuring that marginalised communities are targeted.

Recommendation 10.2: A funded community awareness campaign to be implemented to raise awareness of the scheme and how to access it.

11. What timeframes are required to complete implementation activities after a government decision?

Due to the current funding timeline and the pilot period of the scheme due to end in June 2024, it is important the timing for implementation is swift, without compromising on the accuracy and effectiveness of the proposed requirements.

Recommendation 11.1: The operational guidelines for the scheme, community awareness training and DFV training for relevant staff to be complete by no later than December 2023.

Recommendation 11.2: The Shared Equity Scheme Taskforce consults with the NSW Anti-Slavery Commissioner regarding timeframes, as victim survivors who have experienced modern slavery may experience additional barriers with rebuilding finances or establishing a financial identity.

12. Additional recommendations to improve housing outcomes for domestic and family violence victim survivors.

The expansion of the Shared Equity Scheme, though welcome, will only be accessible to a small cohort of DFV victim-survivors who are able to obtain finance to purchase a home, with the support of the NSW Government. **It is vital that State and Federal Governments significantly increase their investment in a range of additional initiatives to ensure that all DFV victim survivors have safe and secure housing, and that no one is forced to stay in an abusive relationship due to the risk of homelessness.** The following recommendations have been provided to a range of Government inquiries but are yet to be fully implemented.

Recommendation 12.1: Deliver a social housing target of 10% of occupied residential dwellings in NSW by 2050 to provide much needed relief to the current housing crisis and provide safe and affordable housing for women and children who have experienced DFV. DVNSW suggests allocation of 20% for victim-survivors of DFV, recognising that DFV has greater impacts on marginalised communities.

Recommendation 12.2: The NSW Government match the Commonwealth Government's contribution of \$610 million for social housing and ensure specific allocation for women and children experiencing DFV. Pending the passing legislation of the Housing Australia Future Fund (HAFF), ensure 20% allocation of properties for women and children experiencing DFV.

Recommendation 12.3: Ensure safe and affordable transitional housing for women and children exiting crisis refuges by assessing current availability across the state and fund additional capacity particularly in regions where new core and cluster refuges will be built.

Recommendation 12.4: Increase the accessibility and safety of temporary accommodation for women and children experiencing DFV by analysing local availability and auditing current providers. Allocate 20% of all temporary accommodation to women and children experiencing DFV and ensure they are not placed in the same accommodation as perpetrators.

Recommendation 12.5: Invest in social housing for specific marginalised communities including Aboriginal owned housing, people with disabilities, and specific allocation for regional, rural, and remote communities.

Recommendation 12.6: Provide access for women on temporary visas to the entire housing service system include crisis accommodation, transitional accommodation, and social and affordable housing.

Recommendation 12.7: Invest a further \$200 million in comprehensive maintenance works across the NSW social housing portfolio across the next decade, in addition to the \$300 million already committed in the 2022-23 NSW budget.

Recommendation 12.8: Introduce streamlined development approvals for Community Housing Providers to fast-track affordable housing projects and reduce planning and delivery costs.

Recommendation 12.9: Increase the accessibility of private rentals by increasing Commonwealth rent assistance by a minimum of 50%, double the Job Seeker payment and remove 'no grounds' evictions.

Recommendation 12.10: Fund a specialist older person's housing information and support service that comprises both an early intervention and crisis response, similar to the Housing for the Aged Action Group 'Home at Last' model in Victoria.

Recommendation 12.11: Lower the priority age for social housing eligibility from 80 to 55 years as a matter of urgency.

Recommendation 12.12: Review the effectiveness of the Rent Choice Start Safely program, noting that private rental subsidies are less effective due to the high demand and competition in the private rental market. Consideration of other mechanisms to control rents is required, including increasing the supply of affordable housing and caps to rent increases.

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